

ATTACHMENT A

Attachment A – CPUC CEQA Findings of Fact

Regarding the 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) Final Environmental Impact Report (EIR), which consists of the original Draft EIR (December 2007) as revised in the original Final EIR (April 2008), the Recirculated Draft EIR (July 2008), and the Recirculated Final EIR (State Clearinghouse No. 2007071076). In accordance with CEQA Guidelines §15090, the CPUC, as California Lead Agency for the Project, certifies that:

- (1) The Final EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- (2) The Final EIR was presented to the Commission, and the Commission has received, reviewed, and considered the information contained in the Final EIR and hearing documents prior to approving the Project;
- (3) The 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. Those findings are presented below, along with the rationale behind each of the findings. Concurrent with the adoption of these findings, the Commission adopts the Mitigation Monitoring Program as presented in the Final EIR (provided as Section IX at the end of Attachment A).

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). As discussed in Section B of the original Draft EIR, the Project as proposed by SCE in its Application to the CPUC consists of construction of a new 220/115/12 kV substation (the proposed 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 electric 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 will be located within Riverside and San Bernardino Counties, California.

Specifically, the Project 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.

II.2 Project Objectives/Purpose and Need

SCE's stated objectives for the Project 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

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.

- Meet project need in a cost-effective manner.

III. Environmental Review Process and the EIR

The CEQA environmental review process for the proposed El Casco System Project started on July 16, 2007, with the CPUC's issuance of a Notice of Preparation (NOP) of an EIR. The public involvement milestones associated with the environmental review process for the proposed El Casco System Project are described below.

III.1 Originally Published Draft and Final EIR

- **Scoping Process.** As required by CEQA Guidelines §15082, the CPUC issued a NOP on July 16, 2007 that summarized the Proposed Project, stated its intention to prepare an EIR, and requested comments from interested parties. The NOP also included notice of the CPUC's Pre-Hearing Conference for the Proposed Project, and public scoping meetings that were held on August 1, 2007 in the cities of Banning and Beaumont, California. The NOP was filed with the State Clearinghouse on July 16, 2007 (SCH# 2007071076), which initiated the 30-day public scoping period. The review period for the NOP ended on August 14, 2007. Public notification of the NOP included direct agency and public notification, newspaper announcements in five newspapers, and posting on the Project website (<http://www.cpuc.ca.gov/environment/info/aspen/elcasco/elcasco.htm>).
- **Public Meetings During Scoping.** The CPUC held one Pre-Hearing Conference on August 1, 2007, at 1:00 pm at the City of Banning City Council Chambers to identify issues related to the CPUC's General Proceeding and to help determine the need to conduct hearings on the Proposed Project. Two public scoping meetings were held on August 1, 2007 at the City of Banning City Council Chambers and the Beaumont Civic Center, respectively. The public scoping meetings provided an opportunity for the public and government agencies to obtain more information on the proposed El Casco System Project, to learn more about the CEQA environmental review process, to ask questions regarding the Proposed Project, and to provide formal scoping comments. In September 2007, a comprehensive Scoping Report was issued summarizing issues and concerns received from the public and various agencies and presenting copies of all written comments received. The Scoping Report was made available for review at the five repositories and on the project website.
- **Original Draft EIR Public Review Process.** The CPUC published the Draft EIR for the El Casco System Project on December 12, 2007, commencing the 45-day public review period. The Draft EIR included a detailed project description, analysis of impacts in eleven environmental disciplines, cumulative and growth inducing impacts analysis, analysis and comparison of alternatives including the No Project Alternative, and mitigation to reduce or eliminate environmental impacts of the Proposed Project.
- **Original Draft EIR Informational Workshops and Public Participation Meetings.** Two Informational Workshops were held on January 9, 2008 at the City of Banning Council Chambers. The Informational Workshops were intended as an opportunity for the public to learn more about the content and analysis provided in the Draft EIR. The Informational Workshops were conducted in an "open house" format that allowed members of the public and government agencies to view displays, review handouts, and ask questions about the Draft EIR and the environmental review process from the Draft EIR authors. No verbal comments were accepted or recorded at the Informational Workshops; only written comments were accepted. In addition to the Informational Workshops, two Public Participation Meetings were held on January 9, 2008 at

the City of Banning Council Chambers. During the Public Participation Meetings, a short presentation was provided regarding the Proposed Project, the CEQA review process, and the conclusions of the Draft EIR. After the presentation, members of the public, organizations, and agencies had an opportunity to present verbal comments on the Draft EIR. All verbal comments presented at the Public Participation Meetings were transcribed by a court reporter and were included in the Final EIR. Written comments were also accepted at these meetings.

- **Original Final EIR.** The Final EIR was published on April 11, 2008. Per the requirements of California Public Resources Code §21092.5 and CEQA Guidelines §15089, the CPUC provided a response to each public agency, organization, and individual that commented on the Draft EIR. In addition, the Final EIR contained text revisions to the Draft EIR and a summary of the Draft EIR public review process.

III.2 Recirculated Draft and Final EIR

Subsequent to the completion of the originally published Final EIR, SCE provided new information regarding the ambient noise levels adjacent to the existing single-circuit 115 kV subtransmission line. Per CEQA Guidelines §15088.5(a), recirculation is required when significant new information changes the EIR in a way that “deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” This includes changes in the project or environmental setting as well as additional data or other information. The CPUC determined that the new information provided by SCE regarding the environmental setting required recirculation of the El Casco System Project EIR. The public involvement milestones associated with the environmental review process for the Recirculated Draft and Final EIRs are described below.

- **Recirculated Draft EIR Public Review Process.** The CPUC published the Recirculated Draft EIR for the El Casco System Project on July 9, 2008, commencing the 45-day public review period, which ended on August 22, 2008. The public was invited to submit written comment on those portion of the document that were revised and included in the Recirculated Draft EIR; i.e. the revised Executive Summary, Introduction, Noise Analysis, and Comparison of Alternatives (CEQA Guidelines §15088.5(f)(2)).
- **Recirculated Final EIR.** The Recirculated Final EIR was published on October 17, 2008. Per the requirements of California Public Resources Code §21092.5 and CEQA Guidelines §§15088 and 15088.5(f), the CPUC provided a response to each public agency, organization, and individual that commented on the Recirculated Draft EIR during the comment period (July 9, 2008 through August 22, 2008); updated responses to comments previously received during the original Draft EIR comment period (December 12, 2007 through January 25, 2008), which were revised per the new information and analysis contained in the Recirculated Draft EIR (July 2008); and any text changes resulting from comments submitted during the Recirculated Draft EIR comment period (July 9, 2008 through August 22, 2008).

IV. 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, the Commission has made one or more of these specific written findings regarding significant impacts associated with the Project. Such findings are made in Sections V.2 and V.3 below. The environmental impacts and findings presented below consist of those determinations within the originally published Draft and Final EIRs, and those changes made within the Recirculated Draft and Final EIRs. Where applicable, environmental impacts and finding determinations from the Recirculated Draft and Final EIRs are specifically identified below. Otherwise, impacts and determinations presented are from the originally published Draft and Final EIRs.

The EIR evaluation included a detailed analysis of impacts in 11 environmental disciplines, analyzing the Project and three alternatives, including the No Project Alternative. The EIR discloses the environmental impacts expected to result from the construction and operation of the El Casco System Project. Where feasible, mitigation measures were identified to avoid or minimize significant environmental effects. In addition, SCE proposed certain measures as part of the Project to reduce the direct and indirect impacts that will result from Project activities. These measures, referred to as Applicant-Proposed Measures (APMs), were identified by SCE in its PTC Application to the CPUC. Table B-14 (Applicant-Proposed Measures) in Section B.9 of the original Draft EIR provides a detailed list of the APMs. The resource/issue area analyses of the EIR assumed the APMs to be part of the Project. APMs are discussed below in the Findings for each applicable environmental impact.

IV.1 Environmental Impacts Found to be Less Than Significant

Based on the issue area assessments in the EIR (original and recirculated) , the Commission determines that the Project will have no impact or less than significant impacts for several resources/issues as summarized in the table below. The rationale for the conclusion that no significant impacts or less-than-significant impacts would occur in each of the resource/issue areas in the table is based on the detailed discussion of these impacts in the issue area analyses in Section D of the original Draft EIR, as revised by the original Final EIR, the Recirculated Draft EIR, and the Recirculated Final EIR.

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Land Use	LU-1: Conflict with applicable land use plans, policies, or regulations	The Project will not conflict with most applicable land use plans, policies, and regulations. Where a potential conflict would occur, (the proposed El Casco Substation), SCE has entered into an Agreement in Principle with the Riverside Regional Park and Open-Space District. (See original Draft EIR pp. D.3-16 to D.3-21.)
	LU-3: Operation of the Project would result in permanent preclusion of land uses it traverses or adjacent land uses	Operation of the Project in areas where the subtransmission line will be within an existing corridor or adjacent to existing towers will not permanently preclude land uses. SCE has entered into an Agreement in Principle with Riverside Regional Park and Open-Space District for operation of the El Casco Substation, which will mitigate any impacts to a less-than-significant level. (See original Draft EIR pp. D.3-24 to D.3-25.)
	LU-4: Construction or operation would convert Farmland to non-agricultural use	The only conversion of Farmland will be a maximum of 0.002 acre between Mileposts 3.9 and 4.1 in an area that is already disturbed. The remainder of the Project will not be located on Farmland. Due to the limited nature of disturbance at this location, impacts will be less than significant. (See original Draft EIR p. D.3-25.)
	LU-5: Construction or operation would interfere with agricultural operations	Interference with agriculture operations will occur between Mileposts 3.9 and 4.1 and any disturbance in this area will be limited and temporary, resulting in less-than-significant impacts. (See original Draft EIR pp. D.3-24 to D.3-25.)
	LU-6: Construction or operation would conflict with a Williamson Act contract	The Project will traverse 2.5 miles of Williamson Act contract land, but operation of the Project on this land will be consistent with the existing uses of the land. Any disturbance in this area will be limited and temporary, resulting in a less-than-significant impact. (See original Draft EIR p. D.3-25.)
	LU-7: Construction or operation would result in the physical deterioration of a recreational facility due to increased use	The Project will not result in increased use of any recreational facility and will therefore have no impact on recreational uses. (See original Draft EIR p. D.3-25.)
	Cumulatively conflict with applicable land use plans, policies, or regulations (LU-1); result in permanent preclusion of land uses it traverses or adjacent land uses (LU-3); convert Farmland to non-agricultural use (LU-4); interfere with agricultural operations (LU-5); conflict with a Williamson Act contract (LU-6); or result in the physical deterioration of a recreational facility due to increased use (LU-7).	LU-1: Because all related cumulative projects would need to conform to applicable plans, policies, and regulations to be approved, there is no significant cumulative impact to which the Project could contribute. LU-3: Because the Project will result in little permanent preclusion of land, and similar land would be preserved under the land transfer agreement between SCE and the Park District, the Project will have no cumulative contribution to this impact. LU-4: Because the Project will interfere with less than one acre of agricultural land, its contribution to the cumulative interference of agricultural operations would be less than significant. LU-5: Because the Project will convert less than an acre of Farmland to non-agricultural uses, its overall contribution to the cumulative conversion of Farmland would be less than significant. LU-6: Because the limited extent of agricultural land disturbance associated with the Project, the Project's contribution to cumulative conflicts with Williamson Act contracts would also be less than significant. LU-7: Because the Project would not result in population growth and would not result in an increased demand for recreation resources, its contribution to an increased demand of recreation facilities and resultant cumulative deterioration would be less than significant. (See original Draft EIR pp. F-34 to F-38.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Geology and Soils	Cumulative construction activities would cause slope instability (GEO-1); cumulative construction activities would accelerate erosion (GEO-2); project structures would be damaged by corrosive soils, unstable soils, landslides, earthflows, and/or debris flows (GEO-3 and GEO-4); project structures would be damaged by seismically induced groundshaking and ground failure, including liquefaction and lateral spreading (GEO-5); project structures would be damaged by surface fault rupture at crossings of active and potentially active faults (GEO-6); or project structures would be damaged by expansive, soft, loose and/or compressible soils (GEO-7).	There is no potential for impacts GEO-1 or GEO-2 to combine with similar effects of other projects because construction of the Project precludes other projects from being implemented concurrently on the same slopes or site location. Therefore, Project impacts GEO-1 and GEO-2 will not have the potential to combine with similar effects from other projects and will not be cumulatively considerable. (See original Draft EIR pp. F-58 to F-59.) Similarly, there would be no significant cumulative impacts with respect to GEO-3 through GEO-7, because these impacts describe the effect of the localized environment on Project structures, rather than the effect of the Project on the natural environment. Therefore, the effect of these impacts would not have the potential to combine with similar effects of other projects and are not cumulatively considerable. (See original Draft EIR pp. F-59 to F-60.)
Hazards and Hazardous Materials	HAZ-4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment	Three hazardous materials sites occur within a one-mile radius of the El Casco Substation site; however, all three of these sites are located at lower elevations than the proposed substation site and are at least 0.25 mile away. Four sites occur within 0.25 mile of Banning Substation, but all are closed. Therefore, the possibility that contamination associated with these sites could have migrated to the Project alignment to create a hazard to the public or environment is low and impacts will be less than significant. (See original Draft EIR pp. D.7-10 to D.7-11.)
	HAZ-5: For a project located within two miles of a public airport, would the project result in a safety hazard for people residing or working in the Project area	The Project is located within two miles of the Banning Municipal Airport, San Bernardino International Airport, and Redlands Municipal Airport; however, the Project will not result in a safety hazard for people residing or working in the Project area. (See original Draft EIR p. D.7-11.)
	HAZ-6: The project would result in a safety hazard related to a private airstrip for people residing or working in the Project area	There are no private airstrips located within at least three miles of the Project route. (See original Draft EIR p. D.7-11.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Hazards and Hazardous Materials, continued	HAZ-9: Radio and Television Interference	The Project would not result in a conductor surface electrical gradient, as this condition does not occur on subtransmission lines energized at less than 200 kV. Therefore, radio/television/equipment interference would not increase over existing conditions and impacts will be less than significant. Because this impact is less than significant, no mitigation measures are required (See Recirculated Final EIR p. 4-31)
	HAZ-11: Effects on Cardiac Pacemakers	While the subtransmission line's electric field may impact operation of some older model pacemakers, the result of the interference would be of short duration and is not considered harmful. (See original Draft EIR pp. D.7-47 to D.7-48.)
	HAZ-12: Wind, Earthquake, and Fire Hazards	SCE is required to design the transmission line in accordance with safety requirements of the CPUC's G.O.95 and other applicable requirements, so safety impacts from these causes will be less than significant. (See original Draft EIR p. D.7-48.)
	Cumulatively be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment (HAZ-4); located within two miles of a public airport, result in a safety hazard for people residing or working in the project area (HAZ -5); or result in a safety hazard related to a private airstrip for people residing or working in the project area (HAZ -6).	HAZ-4: The Project was not identified on a list of hazardous materials sites and is not at risk of being affected by any of the three adjacent sites that were identified on such lists. Therefore, impacts of the Project will not have the potential to combine with impacts of other past, present and reasonably foreseeable projects and will not result in cumulatively considerable impacts. HAZ-5: As Banning Municipal Airport Land Use Plan and Federal Aviation Administration (FAA) regulations require SCE to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager of the FAA Air Traffic Division for review and approval of the Project, so no cumulative contribution regarding aviation safety impacts will occur. HAZ-6: No private airstrips are located within two miles of the Project; therefore, cumulative impacts will not occur. (See original Draft EIR pp. F-62 to F-64.)
	Cumulatively cause radio and television interference (HAZ-9); cumulatively affect cardiac pacemakers (HAZ-11); or transmission line structures can be affected by wind and earthquakes (HAZ-12).	HAZ-9: Radio and television interference will not be cumulatively considerable because there are no other planned or reasonably foreseeable projects within close proximity to the Project that will contribute to radio and television interference and the Project is not expected to contribute to interference above existing conditions. HAZ-11: Because there are no other projects with the potential to affect cardiac pacemakers within the immediate vicinity of the Project, this impact is not cumulatively considerable. The transmission lines will comply with CPUC safety requirements under G.O.95 and will not impact the environment. Therefore, transmission lines will not combine with other projects and will not contribute to a cumulative impact. HAZ-12: Transmission line structures being affected by wind and earthquakes describes the effect of local environment on the project, rather than the project's effect on the environment. Therefore, this impact cannot combine with other projects and cannot create a cumulatively considerable impact (See Recirculated Final EIR p. 4-46)
Hydrology and Water Quality	HYD-3: Degradation of surface water or groundwater quality would result from the accidental release of potentially harmful materials during operational activities	APM HYDRO-8 will be incorporated into the Project to avoid and reduce the impact of accidentally released materials during construction. Operational activities will not have the potential to cause a significant degradation in water quality from the accidental release of hazardous materials. (See original Draft EIR pp. D.8-22 to D.8-23.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Hydrology and Water Quality, continued	HYD-5: Increased runoff from the creation of new impervious areas	The creation of new impervious areas will be minimal and is not expected to substantially increase runoff. (See original Draft EIR p. D.8-24.)
	HYD-6: Runoff introduced as a result of permanent Project features would cause the overloading of a local stormwater drainage system	The creation of new impervious areas will be minimal and is not expected to substantially increase runoff, therefore the Project will not overload any local stormwater drainage system. (See original Draft EIR pp. D.8-24 to D.8-25.)
	HYD-8: Result in damage from inundation by tsunami, seiche, or mudflow	The Project is not located near the coast or large bodies of water and is therefore not at risk for inundation by tsunami or seiche. Topography in the vicinity of the Project is not of sufficient grade to present a substantial risk of mudflow. (See original Draft EIR pp. D.8-26 to D.8-27.)
	HYD-9: Expose people or structures to flooding as a result of failure of a levee or dam	Project features will not be placed within close proximity to a levee or dam or within the inundation area of a dam. (See EIR original Draft p. D.8-27.)
	Cumulatively disturb existing groundwater resources (HYD-4); increase runoff from the creation of new impervious areas (HYD-5); introduce permanent Project features that would cause the overloading of a local stormwater drainage system (HYD-6); create flood or erosion hazards through the placement of permanent aboveground structures in a flood hazard area, a floodplain, or a watercourse (HYD-7); result in damage from inundation by tsunami, seiche, or mudflow (HYD-9); or expose people or structures to flooding as a result of failure of a levee or dam (HYD-10)	HYD-4: The Project could disturb groundwater resources at the El Casco Substation site through grading, excavation and HDD activities. However, APMs HYDRO-1, HYDRO-2a, HYDRO-2c, HYDRO-2d, HYDRO-4, and HYDRO-8 will be implemented as part of the Project and will minimize the potential for such disturbance to occur. Additionally, there are no other past or reasonably foreseeable projects in the immediate vicinity of the El Casco Substation that would have similar impacts. HYD-5: The amount of new impervious surface created by the Project is negligible in comparison to the amount of permeable surface throughout the watersheds as well as in comparison to that created by future development. HYD-6: Since the majority of cumulative projects are characterized as residential or community developments, it is reasonably assumed that ongoing and future cumulative projects will be constructed with stormwater drainage systems in place and such systems will be designed with sufficient capacity to accommodate stormwater runoff caused by those particular projects. HYD-7: Although the proposed route does span drainage areas and does have features in close proximity to San Timoteo Creek, towers will be located on nearby hillsides and other land areas, and engineered to withstand any stresses associated with their proximity to drainages. Therefore, project structures will not affect flood flows and will not have the potential to contribute to the impacts of other projects to result in a cumulative impact. HYD-9 and HYD-10: No damage to Project structures will occur from inundation by tsunami, seiche, mudflow, or by flooding associated with the rupture of a levee or dam because none of the features or facilities necessary for these events occur near the Project. Therefore, no cumulative contribution will occur. (See original Draft EIR pp. F-68 to F-71.)
Noise	N-1: Construction activities would temporarily increase local noise levels, impacting sensitive receptors and exceeding applicable noise regulations	Construction noise will not exceed that allowed by local ordinances, and APMs NOISE-1 through NOISE-3 will reduce construction-related noise impacts to a less-than-significant level. (See Recirculated Draft EIR pp. D.9-14 to D.9-17.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Noise, continued	N-2: Ground-borne vibration could cause a temporary nuisance during construction	APMs NOISE-1 through NOISE-3 would require construction to occur during hours allowed by applicable local agency policies, a noise control plan that would reduce equipment vibration through attenuation methods, and notification to nearby receptors of construction so they are aware of days to expect potential vibration impacts. These measures minimize the impact of ground-borne vibration to a less-than-significant level. (See Recirculated Draft EIR pp. D.9-17 to D.9-18.)
	N-3: Noise from operation of the overhead subtransmission line	As the Banning Substation, Zanja Substation, and the Mill Creek Communications Site are already in operation as unmanned facilities, the proposed modifications at the substations and communications site will not result in significant increases in noise generation. The permanent noise sources that would occur with operation of the 115 kV subtransmission line are limited to corona noise and routine inspection and maintenance of the line. Because the proposed double-circuit 115 kV design was calculated to produce approximately 24 dBA directly under the centerline of the equipment, compared to approximately 31 dBA generated by the existing single-circuit 115 kV design the corona noise generated by the proposed subtransmission line would be significantly less than the existing baseline ambient noise levels. Therefore, the Project will result in a decrease in corona discharge noise below existing conditions. (See Recirculated Draft EIR pp. D.9-18 through 19.)
	N-4: Noise from inspection and maintenance activities	Inspection and maintenance activities will be infrequent and will not generate noise in excess of local ordinance limits. (See Recirculated Draft EIR p. D.9-19.)
	Noise levels would cumulatively violate local standards (N-1); result in a substantial temporary or periodic increase in ambient noise levels (N-2); generate excessive groundborne vibration or groundborne noise levels (N-3); or cumulatively result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project (N-4).	With respect to cumulative impacts N-1, N-2 and N-3, SCE will implement three APMs to reduce noise impacts associated with construction. The implementation of these APMs will reduce temporary construction noise impacts associated with the Project and temporary construction groundborne noise and vibration impacts associated with the Project, thus reducing the Project's cumulative contribution to noise levels in excess of legal limits. (See Recirculated Draft EIR pp. D.9-31-D.9-32.) With respect to cumulative impact N-4, the Project will not cause permanent noise levels along the ROW to increase due to corona noise from operation of the subtransmission lines. Development of the Project will result in a decrease in corona noise along the ROW as compared to the corona discharge noise currently emitted by the existing 115 kV line. Residential receptors located directly adjacent to the Project ROW may be impacted by noise associated with additional development within 600 feet of these receptors; however, the Project will have no cumulatively considerable contribution to increasing ambient noise levels of the area. Therefore, the combined effect of operational corona noise combined with other proposed development projects located within close proximity to the proposed subtransmission line will result in an insignificant cumulative contribution. (See Recirculated Draft EIR pp. D.9-31 to D.9-32.)
Public Services and Utilities	U-2: Require the need for new or physically altered public service facilities in order to maintain acceptable service ratios, response times, or other performance objectives	The Project will not result in an increase in the local population and therefore will not require the need for new or physically altered public service facilities. (See original Draft EIR pp. D.10-5 to D.10-6.)
	U-3: Project-required utility and public service demands	Neither construction nor operation of the Project will use water or generate wastewater or solid waste in amounts exceeding the capacity of local facilities serving the area. (See original Draft EIR pp. D.10-9 to D.10-10.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Public Services and Utilities, continued	Cumulatively require the need for new or physically altered public service facilities in order to maintain acceptable service ratios, response times, or other performance objectives (U-2); require water, or generate solid waste or wastewater that cumulatively exceeds the ability of existing facilities to accommodate the new capacities, or generate a need for expansion of existing facilities (U-3).	U-2: No construction workers are expected to temporarily relocate to the area and no new workers will be required for operation of the new subtransmission line and substations. Therefore, while cumulative development will require expansion of the public services in the area, the Project's incremental contribution to the overall demand for fire and police protection services is considered less-than-significant. For a discussion of the cumulative impact that would occur to public services as a result of combined construction areas limiting emergency service access, see Section IV.2.8 (Transportation and Traffic), below. U-3: The Project's incremental contribution to the overall demand for public service and utility services is considered less than significant. (See original Draft EIR pp. F-80 to F-81.)
Transportation and Traffic	T-2: Traffic generated by construction	As the transmission line workers will be dispersed throughout the project area and will not typically be working at the same place at any one time, only minimal traffic increases will occur on the study area roadway network relative to construction workers. Similarly, the construction-related truck traffic will be dispersed throughout the project route and throughout the workday. Project-related construction traffic will result in a less than significant impact on traffic conditions in the project area. (See original Draft EIR p. D.11-8 to D.11-9.)
	T-11: Construction and operations would affect aviation activities associated with public airports	Potential conflicts with the Banning Municipal Airport from both construction and operational activities along the eastern section of the subtransmission line will occur. However, pursuant to FAA guidelines, SCE will submit FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager of the FAA Air Traffic Division for review and approval of the Project. Compliance with FAA guidelines will ensure that construction and operational impacts to aviation activities are less than significant. (See original Draft EIR pp. D.11-12 to D.11-13.)
	Cumulatively result in an increase in vehicle trips associated with construction workers or equipment that would result in an unacceptable reduction in level of service on the roadways in the geographic scope area (T-2); or cumulatively result in safety problems for public airports (T-11).	T-2: Development in the Riverside and San Bernardino County areas has contributed to congestion on area roadways that will likely be traveled by construction-related traffic associated with the Project. As all Project-related commute traffic and construction truck/equipment activity on local roadways will be dispersed over the entire Project area and dispersed over time, this traffic will only create short-term delays and account for minimal additional traffic volumes on study area roadways. Therefore, the Project's cumulative contribution to impacts related to construction traffic, reducing area roadway capacity, or level of service will be temporary and insignificant. T-11: A portion of the 115 kV subtransmission line will be located approximately 4,000 feet west of Banning's Municipal Airport runway and within the Banning Municipal Airport Land Use Plan. Many approved or pending projects are located along this segment of the Proposed Project subtransmission route and within proximity of the Banning Municipal Airport. However, these projects are all subject to the same FAA regulations as the Proposed Project. Therefore, even if construction of these projects occur at the same time as the Proposed Project, compliance with FAA guidelines ensures that cumulative impacts to airport operations will be less than significant. (See original Draft EIR pp. F-83 to F-87.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Visual Resources	V-1: Short-term visibility of construction activities, equipment, and night lighting	Construction activities along the subtransmission line, loop-ins, and fiber optic routes will be transient and of short duration as construction progresses along the routes. 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. (See original Draft EIR pp. D.12-21 to D.12-22.)
	V-5: Increased structure contrast, industrial character, view blockage and glare when viewed from Key Viewpoint 3 in the new residential development north of San Timoteo Canyon Road	The new substation will be partially screened from view by intervening terrain and vegetation, especially when viewed from the lower elevations of the residential development. The overall visual change will be moderate and in the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact would be adverse but less than significant. (See original Draft EIR p. D.12-26.)
	V-6: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 4 on eastbound SR-60	The overall visual change caused by replacement of the existing subtransmission line with the new double-circuit subtransmission line at this location will be moderate when the three equally weighted factors of visual contrast, Project dominance, and view blockage are combined. In the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact will be adverse but less than significant. (See original Draft EIR p. D.12-27.)
	V-7: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 5 on Faircliff Street	The overall visual change caused by replacement of the existing subtransmission line with the new double-circuit subtransmission line at this location will be moderate when the three equally weighted factors of visual contrast, Project dominance, and view blockage are combined. In the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact will be adverse but less than significant. (See original Draft EIR pp. D.12-27 to D.12-28.)
	V-8: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 6 on Pine Valley Road in the Sun Lakes development	The proposed TSPs will have a simpler but taller structural design compared to the H-frame structures they would replace. Also, the proposed TSPs will 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 will also result in a slight net increase in view blockage of background mountains and sky. However, because the existing subtransmission line towers and conductors have established a structural precedence with respect to form and line, the resulting visual contrast will be moderate. In the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact will be adverse but less than significant. (See original Draft EIR p. D.12-28.)
	V-9: Increased structure contrast and industrial character when viewed from Key Viewpoint 7 on East Lincoln Street in the City of Banning	The overall visual change caused by modifications to Banning Substation will be low-to-moderate in the already-industrial view of the substation. In the context of the existing landscape's moderate visual sensitivity, the resulting visual impact will be adverse but less than significant. (See original Draft EIR p. D.12-29.)
	V-10: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 8 on North Juniper Avenue in the City of Yucaipa	In the context of the existing structural complexity and substantial industrial character exhibited by the existing substation facilities, the new structures and equipment will be minimally noticeable to the casual observer. Because the existing substation facilities have established a complex structural and industrial precedence with respect to form, line, and character; the resulting incremental increase in visual contrast will be low and the new equipment will appear subordinate-to-co-dominant compared to the existing substation components. (See original Draft EIR pp. D.12-29 to D.12-30, and original Final EIR pp. 4-45 – 4-46.)

Resource	Impact Evaluation Category	Rationale for No Impact or Less than Significant Impacts
Visual Resources, continued	V-11: Increased structure contrast, view blockage, and skylining when viewed from Key Viewpoint 9 on Carter Street in the City of Yucaipa	At a viewing distance of approximately 1.5 to 5 miles (depending on location in the immediate Yucaipa area), the Mill Creek microwave structure on the ridgeline will be minimally noticeable to the casual observer, though it could be visible. The resulting visual contrast associated with the faint vertical structure along the generally horizontal ridgeline will be low and the new structure will appear subordinate compared to the more massive mountain landform. The resulting visual impact will be adverse but less than significant. (See original Draft EIR p. D.12-30.)
	V-12: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 10 on southbound Live Oak Canyon Road	The new fiber optic line will appear very similar to the cable that is already present on the existing utility poles, and it is unlikely that the additional cable would be noticed by travelers on Live Oak Canyon Road or casual observers along other portions of the fiber optic route. The resulting visual impact will be adverse but less than significant. (See original Draft EIR p. D.12-31.)
	Cumulative impacts to a perceived increase in structure contrast, industrialization of the landscape, view blockage, and skylining from Banning Substation (V-9).	Given the separation distance between two nearby identified cumulative projects and the slight increase in industrial character associated with the Project's required modifications to the Banning substation at Key Viewpoint 7, it is likely that few people would make a visual connection between the projects. The resulting cumulative visual impact would be less than significant. (See original Draft EIR pp. F-93 to F-94.)

IV.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 EIR. These findings are based on the discussion of impacts in the detailed issue area analyses in Section D of the original Draft EIR and the cumulative impacts discussed in Section F (Cumulative Scenario and Impacts) of the original Draft EIR, as revised in original Final EIR (April 2008) and the Recirculated Final EIR (October 2008). An explanation of the rationale for each finding is presented below.

V.2.1 Land Use

To gather information regarding the effects of the Project on local and regional land uses, the CPUC contacted representatives from each of the affected jurisdictions in addition to collecting field data. The field data identified existing and sensitive land uses along the route. Sensitive land uses are defined as land uses that are susceptible to disturbances resulting from either construction or operation of a project (e.g., noise, traffic, dust, etc.) (see Section D.3.3 of the original Draft EIR). In general, residences, educational institutions, recreational facilities, and public facilities (e.g., religious facilities, health care facilities) are considered to be sensitive land uses for purposes of the EIR. Land uses identified in the analysis include those that are located immediately adjacent to the Project, that will be affected by construction and operation activities, or that have national, regional, or local significance and are within one mile of the route (see Sections D.3.1 and D.3.5 of the original Draft EIR).

Impact LU-2: Construction would temporarily disturb the land uses it traverses or adjacent land uses

As discussed in Section D.3.3 of the original Draft EIR, the increased construction activity along the Project route will temporarily disrupt existing land uses. The construction of the Project will bring traffic and construction noise from heavy construction equipment on temporary and permanent access roads, moving building materials to the tower sites and returning to construction staging areas. The 115 kV subtransmission line replacement activities will traverse open space, agricultural, rural residential, residential, industrial, and recreational uses, including the Sun Lakes community and the Sun Lakes Country Club and golf course. Approximately 237 residential structures will be adjacent to portions of the 115 kV subtransmission line ROW where construction will occur. Access to residences or businesses could potentially be restricted during stringing activities across roads or due to the movement of material to construction sites. In addition, the El Casco Substation will be constructed in the Norton Younglove Reserve, and disturbance to recreationists in the Reserve would occur during construction.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact LU-2. Specifically, the CPUC finds that Mitigation Measures LU-2a and LU-2b will reduce land use impacts to a less-than-significant level. These measures are identified below.

LU-2a Coordinate Construction Schedule with Public and Community Facilities. SCE shall coordinate with public and community facilities and services regarding the construction schedule and duration in order to minimize impacts to these land uses. The purpose of this measure is to work with sensitive land uses that would be impacted by construction and to identify construction times/periods that would have the least impact to peak use of these public and community facilities. This coordination could result in limiting or avoiding construction during peak facility uses. Prior to construction at a particular location or construction spread, SCE shall document its

coordination efforts including contact persons, information provided, and comments received, and submit this documentation to the CPUC.

LU-2b Prepare Construction Notification Plan. Forty-five days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC for approval. The Plan shall identify the procedures that SCE will follow to inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). To ensure effective notification of construction activities, the plan shall address at a minimum the following components:

- **Public notice mailer.** Fifteen days prior to construction, a public notice mailer shall be prepared. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and reserves). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.
- **Newspaper advertisements.** Fifteen days prior to construction within a route segment, one round of newspaper advertisements shall be placed in local newspapers and bulletins. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction.
- **Public venue notices.** Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, resource management offices, and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information about the trail detour at applicable resource management offices and post the notice within two miles north and south of the detour. For recreation facilities and reserves, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.
- **Public liaison person and toll-free information hotline.** SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.

Rationale for Finding. Most construction impacts will be addressed by compliance with visual, noise, traffic, air quality, and other environmental mitigation measures as noted below. Notification regarding construction activities and a procedure for responding to construction complaints or questions will further reduce land use impacts along the Project route. Mitigation Measure LU-2b (Prepare Construction Notification Plan) is a comprehensive mitigation measure that ensures adequate notification of construction activities and requires a contact person in case residents or landowners have questions or concerns

regarding the construction activities. The measures also require coordination of the construction schedule to reduce disruptions to public and community facilities along the route to a less-than-significant level.

Reference. Original Draft EIR Section D.3.3.3 provides a complete assessment of the construction land use impacts of the Project.

Impact LU-8: Construction or operation would disrupt recreational activities such that recreational values would be reduced

As discussed in Section D.3.3.3 of the original Draft EIR, the El Casco Substation and a portion of the El Casco-Banning 115 kV subtransmission line will be constructed within the Norton Younglove Reserve, a passive recreation area. The 115 kV subtransmission line replacement will cross the Sun Lakes Country Club golf course, run along the southern border of the AC Dysart Equestrian Park, and run approximately 0.3 mile west of Lion's Recreation Park. Installation of the fiber optic cable on the existing SCE poles and within existing underground conduit will occur adjacent to or through Norton Younglove Reserve, PGA of Southern California Golf Club, Oak Valley Golf Club, Sun Lakes Country Club golf course, Pass Valley Park, City of Redlands Community Park, Yucaipa Community Park, Flag Hill Veterans Memorial Park, and the San Bernardino National Forest Mill Creek Ranger Station. Construction activities could preclude access or disrupt recreational activities, especially at the El Casco Substation and the Sun Lakes Country Club golf course.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact LU-8. Specifically, the CPUC finds that Mitigation Measures LU-2a and LU-2b (described above under Impact LU-2) will reduce land use impacts to a less-than-significant level.

Rationale for Finding. Most construction impacts will be addressed by compliance with visual, noise, traffic, air quality, and other environmental mitigation measures as noted below. Notification regarding construction activities and a procedure for responding to construction complaints or questions will further reduce land use impacts along the Project route. Mitigation Measure LU-1b (Prepare Construction Notification Plan) is a comprehensive mitigation measure that ensures adequate notification of construction activities and requires a contact person in case residents or landowners have questions or concerns regarding the construction activities. The measures also require coordination of the construction schedule to reduce disruptions to recreational facilities along the route to a less-than-significant level.

Reference. Original Draft EIR Section D.3.3.3 provides a complete assessment of the land use impacts of the Project.

Cumulative Land Use Impacts: Cumulative project activities could disturb the land uses it traverses or adjacent land uses (LU-2) and disrupt recreational activities such that recreational values would be reduced (LU-8)

As discussed in Section F.1.5.2 (Cumulative Impact Analysis – Land Use) of the original Draft EIR, it is possible that a variety of projects will occur at the same time as Project construction. Clusters of projects, including: the Trammel Crow-California Palms Business Center (B23 and B24), Watson Distribution Center (B9), Commission Review and Approval Nos. 801 and 802 (B26 and B27) in the City of Redlands; housing tract developments in the City of Yucaipa (C22, C25, and C28); the Heartland Project, Aim All Storage, Oak Valley Plaza, and Kirkwood Ranch in the City of Beaumont (F11, F14, F17, and F18); and the Charter Management/Galleher, Vicseth Construction, HLCD, Halem, TMS Homes, Citicom/William Fox Homes developments in the City of Banning (E22, E23, E24, E25, E32, E35, and E37) could all disturb adjacent land uses if the projects in these clusters were to occur simultaneously. The combined construction effects of multiple projects could be cumulatively significant at various times

during construction. However, the Project's contribution to this impact will not be cumulatively considerable because installation of the fiber optic cable is the only project activity that will be in the vicinity of these clusters of projects and such installation will result in little to no disturbance to surrounding land uses. The two areas of the Project that will result in significant impacts to surrounding land uses are in Norton Younglove Reserve and in the Sun Lakes Community. However, none of the cumulative project activities or plans listed in Table F-2 will affect either of these areas, so no impacts will combine with the Project's impacts there. Therefore, no significant cumulative impact will occur at either of these sites. Mitigation Measure LU-2a (Coordinate construction schedule with public and community facilities) and LU-2b (Prepare Construction Notification Plan), discussed in original Draft EIR Section D.3.3.3, will further minimize the Project's contribution to any cumulative impacts. Therefore, cumulative impacts will not be considerable.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate or avoid its significant effects. Specifically, Mitigation Measures LU-2a and LU-2b (listed above) will reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Rationale for Finding. The combined construction effects of multiple projects could be cumulatively significant at various times during construction. However, the Proposed Project's contribution to this impact is not cumulatively considerable because installation of the fiber optic cable is the only project activity that would be in the vicinity of these clusters of projects, and such installation will result in little to no disturbance of surrounding land uses. The two areas of the Project that will result in significant impacts to surrounding land uses are in Norton Younglove Reserve and in the Sun Lakes Community. Because no other projects will affect either of these areas, no cumulative impacts will occur in there. Mitigation Measures LU-2a and LU-2b will reduce the Project's contribution to any cumulative impacts to less than cumulatively considerable.

Reference. Section F.1.5.2 (Cumulative Impact Analysis – Land Use) of the original Draft EIR provides a complete assessment of the cumulative impact on Land Use. Section D.2 (Land Use) of the original Draft EIR provides a detailed description of the effects of the Project on Land Use.

IV.2.2 Biological Resources

As discussed in Section D.4 (Biological Resources) of the original Draft EIR, extensive literature searches were conducted consisting of a review of relevant databases, maps, technical reports, jurisdictional plans and policies, as well as relevant environmental documents to determine the federal and State listed endangered, threatened, proposed endangered or threatened, rare, and special-status plant and wildlife species that have potential to occur within the vicinity of the Project route and proposed substation site. In addition, extensive field surveys were conducted in order to verify the location of any habitat or species of wildlife that will be affected by new project development and areas of temporary construction activity. Biological reconnaissance surveys, focused surveys, and a wetland delineation were conducted during spring/summer of 2005, 2006, and 2007.

For the purposes of the analysis in the EIR and based on CEQA requirements, biological resources identified include all plant and wildlife species and habitat observed during field studies and all those included in the results of the literature review. Those identified were analyzed in order to identify portions of the ROW that are known to support listed and special-status plant and wildlife species, or are most likely to support habitat for listed and special-status plant and wildlife species.

Impact B-1: The Project would cause temporary or permanent loss of native vegetation communities

As discussed in Section D.4.5.2 (Biological Resources) of the original Draft EIR, the Project will result in both temporary and permanent impacts to a variety of regionally unique habitats. Ground-disturbing

activity, including tower pad preparation and construction, grading of new access roads and the substation site, transportation, maintenance of construction equipment and supplies, staging area and material yard preparation and use, and use or improvement of existing access roads has the potential to disturb the vegetation communities. This impact was found to be consistent for the Project and all alternative routes studied. APMs BIO-1 and BIO-4 have been incorporated into the Project to reduce impacts to native vegetation. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact B-1. The CPUC finds that the following measures will mitigate significant effects on native vegetation from Impact B-1 to a less-than-significant level. These measures are identified as B-1a and B-1b below.

B-1a Prepare and Implement a Habitat Restoration/Compensation Plan. SCE shall prepare and implement a Habitat Restoration/Compensation Plan. The Plan shall include, but not be limited to, the following:

- Restore all areas disturbed by Project construction, including temporary disturbance areas at the El Casco substation site, around structure construction sites, laydown/staging areas, temporary access and spur roads, and existing tower locations that are removed during construction of the Proposed Project.
- All grading activities at the proposed El Casco substation shall include topsoil salvage. Topsoil shall be removed, stockpiled on-site, and returned to the original site or used in habitat restoration activities elsewhere on the site.
- Where onsite restoration is planned for mitigation of temporary impacts to sensitive vegetation communities, SCE shall identify a qualified Habitat Restoration Specialist to be approved by the CPUC.
- Hydroseeding, drill seeding, or an otherwise proven restoration technique shall be utilized on all disturbed surfaces using a locally endemic native seed mix approved by the CPUC. The seed mix shall be consistent with the requirements of the MSHCP.
- The Plan shall include the applicable Best Management Practices identified in the MSHCP.
- For the permanent loss of riparian habitat, SCE shall mitigate at a minimum of 2:1 or as identified in the CDFG Streambed Alteration Agreement.
- The creation or restoration of all habitats shall be monitored for five years after initial planting, or until established success criteria are met, to assess progress and identify potential problems with the restoration site. Remedial activities (e.g., additional planting, weeding, or erosion control) shall be taken during the monitoring period if necessary to ensure the success of the restoration effort. If the mitigation fails to meet the established performance criteria after the five-year maintenance and monitoring period, monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise noted by the CPUC/CDFG.

B-1b Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance. SCE shall provide copies of all approved permits (1602, 404, 401, 402, MSHCP, MSHCP HANS Process for Criteria Cells) prior to ground disturbance in any location requiring the aforementioned permits. SCE shall provide documentation to the CPUC demonstrating compliance with the MSHCP prior to the onset of any ground disturbance.

Rationale for Finding. Implementation of the above mitigation measures will restore all areas disturbed by Project construction, including temporary disturbance areas around tower construction sites, around the El Casco Substation, laydown/staging areas, temporary access and spur roads, and existing tower locations.

Where impacts are permanent, compensation for the loss of habitats will be provided through implementation of the Habitat Restoration/Compensation Plan and compliance with the MSHCP. MSHCP and regulatory permit acquisition will also be ensured. Therefore, impacts to native vegetation will be mitigated to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-2: The Project would cause loss of foraging or breeding habitat for wildlife

Several vegetation communities present in the Project area (Section D.4.1.3.3 Sensitive Vegetation Communities) provide important foraging habitat for birds, small mammals, and reptiles. Construction of the proposed El Casco substation will result in the largest single loss of foraging habitat for the Project. Installation of new tower locations will result in minimal habitat loss as the towers are small, are replacing existing towers, and temporary impacts from grading will be restored at the completion of construction. This impact was found to result from the Project and all alternative routes studied. APMs BIO-1 and BIO-4 have been incorporated into the Project to reduce impacts to wildlife foraging or breeding habitat. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact B-2. Specifically, the CPUC finds that Mitigation Measures B-1a and B-1b (identified above under Impact B-1) will mitigate significant effects on wildlife foraging and breeding habitat from Impact B-2 to a less-than-significant level.

Rationale for Finding. Implementation of Mitigation Measures B-1a and B-1b will restore all areas disturbed by Project construction, including temporary disturbance areas around tower construction sites, around the El Casco Substation, laydown/staging areas, temporary access and spur roads, and existing tower locations. Where impacts are permanent, compensation for the loss of habitats will be provided through implementation of the Habitat Restoration/Compensation Plan and compliance with the MSHCP. MSHCP and regulatory permit acquisition will also be ensured. Therefore, impacts to wildlife foraging and breeding habitat will be mitigated to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-3: The Project would introduce non-native and invasive plant species

As discussed in Section D.4.5.2 of the original Draft EIR, the Project will temporarily remove native vegetation communities at the construction sites located adjacent to each tower and along access roads, laydown areas, and the El Casco Substation site. Introduction of non-native plant species will occur primarily during construction, but will also continue to occur during operation and maintenance phases of the Project. This impact was found to result from the Project and all alternative routes studied.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-3. Specifically, the CPUC finds that implementation of Mitigation Measures B-1a and B-1b (identified above under Impact B-1) and B-3a and B-3b below will mitigate significant effects of invasive non-native or noxious plant species from Impact B-3 to a less-than-significant level.

B-3a Implement Weed Control Measures. SCE shall ensure that all vehicles and large equipment utilized on the Project have been washed prior to commencing work on the Proposed Project. This

includes wheels, undercarriages, bumpers and all parts of the vehicle. SCE shall keep a written log documenting that vehicles have been cleaned prior to use on the project. Once equipment and vehicles have been staged on the job site no further washing would be required unless the vehicles or equipment are exposed to populations of noxious weeds present on the site.

B-3b Landscape with Native or Non-invasive Plant Species. SCE shall ensure that all landscape plants utilized at the El Casco substation are not considered invasive by the California Invasive Plant Council (CAL-IPC). Plant species shall be utilized that have a low likelihood of spreading to the adjacent riparian corridor and require minimal watering.

Rationale for Finding. Implementation of the measures outlined in B-1a, B-1b, B-3a, and B-3b will restore all areas disturbed by project construction, including temporary disturbance areas around tower construction sites, the El Casco Substation site, laydown/staging areas, and temporary access and spur roads. In addition, implementation of these mitigation measures will ensure construction control measures to prevent the spread of invasive and noxious weeds, and landscaping with native or non-invasive plant species at the El Casco Substation. Together these measures would ensure impacts to the corridor and El Casco Substation site related to invasive and noxious weeds will be mitigated and impacts to these lands will be reduced a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-4: The Project would result in a loss of nesting birds

As discussed in Section D.4.5.2 of the original Draft EIR, construction activities, including the construction of towers, the establishment of staging/laydown facilities, stringing of conductors and fiber optic communications line, construction of the El Casco Substation, and the increased presence of humans may result in direct or indirect impacts to nesting birds that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-2 has been incorporated into the Project to reduce the possibility of impacts from construction activities during the breeding season for raptors and other migratory birds. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-4. Specifically, the CPUC finds that Mitigation Measure B-1b and the following Mitigation Measure B-4 will mitigate significant effects to birds from Impact B-4 to a less-than-significant level.

B-4 Conduct Pre-Construction Surveys and Monitoring for Breeding Birds. SCE shall conduct protocol-level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds. For sections of the Project which occur within the MSHCP, protocol surveys may be waived if SCE provides evidence of compliance with the MSHCP. This approval will require written verification from the RCA that protocol surveys will not be required. SCE shall still conduct pre-construction surveys to check for nesting birds not covered by the MSHCP. These surveys shall commence two weeks prior to construction and be repeated as construction activities occupy new sections of the ROW. Documentation of these surveys shall be provided to the CPUC. Surveys shall be conducted in areas within 500 feet of tower sites, laydown/staging areas, substation sites, and access road/spur road locations. If active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the 300-foot buffer

until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The 300-foot buffer may be adjusted to accommodate environmental conditions (background noise, existing level of disturbance, nest location) with the approval of the CPUC monitor and the CDFG.

Rationale for Finding. Conducting protocol level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds, as outlined above in B-4, will mitigate impacts to the Project route related to breeding birds to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-5: The Project would result in permanent disturbance to wildlife at the proposed El Casco Substation site due to noise and increased human presence

As discussed in Section D.4.5.2 of the original Draft EIR, construction and operation of the El Casco Substation will create and maintain disturbance conditions that could degrade the function of habitat linkages associated with the San Timoteo Creek riparian corridor and existing open space within and around the Norton Younglove Reserve. This impact was found to be consistent for the Project and all alternatives studied. APMs BIO-3 and BIO-5 through BIO-7 have been incorporated into the Project to reduce impacts to wildlife at the El Casco Substation. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-5. Specifically, the CPUC finds that Mitigation Measures B-1b and B-4 described under Impacts B-1 and B-4 above, respectively, and the Mitigation Measures B-5a, B-5b, and B-5c, discussed below, will mitigate significant effects to wildlife at the El Casco Substation site from Impact B-5 to a less-than-significant level.

B-5a Reduce Noise Levels during Construction. SCE shall ensure that all heavy equipment install and maintain mufflers or other noise-reducing features when working at the substation site. SCE shall monitor and log sound levels at the edge of the riparian corridor and ensure noise levels do not result in a disruption to nesting birds. If construction noise is adversely affecting nesting birds subject to protection by the MBTA or State and federally listed species, work shall cease (unless authorized through the context of a Biological Opinion) until adequate sound barriers can be constructed to reduce noise levels at the edge of the riparian corridor. The CPUC and USFWS shall approve any sound barriers utilized at the Project site. Construction activities shall be limited to daylight hours, between 0700 and 1700 hrs.

B-5b Use Magnetic Coils at Entrance Gate. Instead of motion-activated lighting, SCE and its Contractors shall install magnetic coils, or other technology, in the entrance road to each transition station to activate low-level, directional lighting at the locked entrance gate.

B-5c Use Shielded Lighting and Schedule Daylight Maintenance. SCE shall use low-level shielded lighting at the El Casco substation site in order to illuminate equipment areas within the substations. Shielded lighting shall be installed to limit spill-over glare and nighttime sky-lighting. The brightness of station lighting shall be kept at levels consistent with health and safety requirements. SCE shall ensure that routine maintenance and repair activities are only conducted during daylight hours.

Rationale for Finding. Complying with the MSHCP, conducting protocol level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds, reducing noise during construction, controlling lighting at the Substation, and scheduling maintenance

during daylight hours as outlined above in B-1b, B-4, B-5a, B-5b, and B-5c, will mitigate impacts to wildlife at the El Casco Substation site to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-6: Construction activities would result in indirect or direct loss of listed plants

As discussed in Section D.4.5.3 of the original Draft EIR, construction activities, including the construction of towers, construction of the El Casco Substation, the establishment of staging/laydown facilities, stringing of conductors, and the increased presence of humans may result in direct or indirect impacts to listed plant species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APMs BIO-1 and BIO-4 have been incorporated into the Project to reduce impacts to listed plants. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-6. Specifically, the CPUC finds that implementation of Mitigation Measure B-6 below will mitigate significant Project effects to listed plant species from Impact B-6 to a less-than-significant level.

B-6 Conduct Surveys for Sensitive Plant Species and Flag for Avoidance. SCE shall conduct focused surveys prior to construction during the floristic period appropriate for each of the sensitive plant species identified in Table D.4-3 with the potential to occur within the Project ROW and within 100 feet of all surface-disturbing activities. For sections of the Project which occur within the MSHCP, protocol surveys for narrow endemic plants may be waived if SCE provides evidence of compliance with the MSHCP. This approval will require written verification from the RCA that protocol surveys will not be required. SCE shall still conduct pre-construction surveys for rare plants to check for species not covered by the MSHCP. Populations of sensitive plants shall be flagged and mapped prior to construction. If sensitive plants (CNPS List 1A, 1B, or 2) are located during the focused surveys, then modification of the placement of structures, access roads, laydown areas, and other ground-disturbing activities would be implemented in order to avoid the plants. If listed plant species or species requiring 90 percent avoidance by the MSHCP cannot be avoided, SCE shall avoid the plants until authorized to proceed through the context of a Biological Opinion and authorized through the MSHCP Determination of Biologically Equivalent or Superior Preservation process.

Rationale for Finding. Incorporation of all APMs and implementation of the measure outlined above as Mitigation Measure B-6 will ensure that all listed plant species potentially impacted will be flagged and avoided unless authorized to proceed by a MSHCP Determination, and impacts to listed plant species will be reduced to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-7: Construction activities would result in indirect or direct loss of Quino Checkerspot habitat

As discussed in Section D.4.5.3 of the original Draft EIR, potential habitat is present for the Quino checkerspot butterfly within the Project area. If present, direct impacts to this species could occur through removal of host plants required by this species. Potential indirect effects to the species could occur from the spread of noxious or invasive weeds that degrade habitat utilized by this species. APM BIO-4 has been incorporated into the Project to reduce impacts to Quino checkerspot butterfly and its habitat.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-7. Specifically, the CPUC finds that Mitigation Measures B-1a, B-1b, and B-3a, described under Impacts B-1 and B-3 above, respectively, will mitigate significant effects to Quino checkerspot butterfly and its habitat from Impact B-7 to a less-than-significant level.

Rationale for Finding. The measures outlined in B-1a, B-1b, and B-3a will reduce impacts to Quino checkerspot butterfly or habitat by restoring all areas disturbed by Project construction, including temporary disturbance areas around tower construction sites, around the El Casco Substation, laydown/staging areas, temporary access and spur roads, and existing tower locations. Where impacts are permanent, compensation for the loss of habitats will be provided through implementation of the Habitat Restoration/Compensation Plan and compliance with the MSHCP. MSHCP and regulatory permit acquisition will also be ensured. The spread of noxious weeds will be minimized. Therefore, impacts to Quino checkerspot butterfly and its habitat will be less-than-significant.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-8: The Project would result in habitat loss or disturbance to listed birds, including migratory birds and raptors

As discussed in Section D.4.5.3 of the original Draft EIR, the construction of towers, construction of the El Casco Substation, the establishment of staging/laydown facilities, stringing of conductors, and increased noise and presence of humans may result in disturbance to and loss of habitat for listed bird species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-2 has been incorporated into the Project to reduce significant effects to listed bird species from Impact B-8 to a less-than-significant level. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-8. Specifically, the CPUC finds that implementation of Mitigation Measures B-4, discussed under Impact B-4, will mitigate significant Project effects to listed bird species from Impact B-8 to a less-than-significant level.

Rationale for Finding. By conducting protocol level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds, as outlined in B-4, impacts to listed bird species will be mitigated to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-9: The Project would result in the electrocution of listed bird species

As discussed in Section D.4.5.3 of the original Draft EIR, large, aerial-perching birds such as hawks and eagles are susceptible to electrocution on power lines. However, electrocutions most often occur on lines energized at voltages of 69 kV or less and risk of electrocution is considered low on subtransmission lines energized at voltages of 115 kV, such as the one proposed for this Project. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-14 has been incorporated into the Project to reduce significant effects to listed bird species from Impact B-9 to a less-than-significant level. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact B-9. Specifically, the CPUC finds that implementation of Mitigation Measure B-9 will mitigate significant Project effects to bird species from Impact B-9 to a less-than-significant level.

B-9 Construct to 2006 APLIC Guidelines. SCE shall conform to the latest practices (as outlined in the 2006 APLIC document) to protect birds from electrocution. Implementation of these guidelines shall be verified by the CPUC.

Rationale for Finding. By constructing the Project to conform with 2006 APLIC guidelines, as required by Mitigation Measure B-9, impacts to bird species from electrocution will be mitigated to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-10: The Project would result in subtransmission line collisions by listed bird species

As discussed in Section D.4.5.3 of the original Draft EIR, the operation of the Project may result in mortality of listed or sensitive bird species by posing a risk of collision and is a significant impact. This impact was found to be consistent for the Project and all alternative routes studied.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact B-10. Specifically, the CPUC finds that implementation of Mitigation Measure B-10 will mitigate significant effects related to bird collisions from Impact B-10 to a less-than-significant level.

B-10 Utilize Collision-Reducing Techniques. SCE shall install the subtransmission line utilizing APLIC standards for collision-reducing techniques as outlined in “Mitigating Bird Collisions with Power Lines: The State of the Art in 2006 (APLIC, 2006).”

Rationale for Finding. By using APLIC standard collision-reducing techniques, as required by Mitigation Measure B-10, impacts to listed bird species will be reduced to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-11: The Project would result in the loss of special-status plant species

As discussed in Section D.4.5.4 of the original Draft EIR, construction activities, including the construction of towers, construction of the El Casco Substation, the establishment of staging/laydown facilities, stringing of conductors, and the increased presence of humans may result in direct or indirect impacts to special-status plant species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APMs BIO-1 and BIO-4 have been incorporated into the Project to reduce impacts to special-status plants. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-11. Specifically, the CPUC finds that implementation of Mitigation Measures B-1a, B-1b, B-3a, and B-6, described above, will mitigate significant Project effects to special-status plant species from Impact B-11 to a less-than-significant level.

Rationale for Finding. Implementation of the measures outlined in B-1a, B-1b, B-3a, and B-6 will restore all areas disturbed by project construction, including temporary disturbance areas around tower construction sites, the El Casco Substation site, laydown/staging areas, and temporary access and spur roads. In addition, implementation of these mitigation measures will ensure construction control measures to prevent the spread of invasive and noxious weeds, and all listed plant species potentially impacted will be flagged and avoided or avoided until authorized to proceed. Together these measures would ensure impacts to special-status plant species will be reduced a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-12: Construction activities would result in indirect or direct loss of individuals, or a direct loss of habitat for sensitive wildlife

As discussed in Section D.4.5.4 of the original Draft EIR, construction activities, including the construction of towers, construction of the El Casco Substation, the establishment of staging/laydown facilities, stringing of conductors, and the increased presence of humans may result in direct or indirect impacts to habitat containing sensitive wildlife species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-4 has been incorporated into the Project to reduce significant effects to sensitive wildlife habitat through compliance with the MSHCP. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-12. Specifically, the CPUC finds that the implementation of the mitigation measure identified as B-1b, described above under Impact B-1, will reduce significant effects to individuals or habitat for sensitive wildlife species from Impact B-12 to a less-than-significant level.

Rationale for Finding. The measures outlined in B-1b will ensure compliance with the MSHCP and acquisition of regulatory permits, which will reduce impacts to sensitive wildlife species and habitat to a less than significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-13: The Project would result in the loss of special-status reptile species

As described in Section D.4.5.4 of the original Draft EIR, direct effects to special-status reptiles may occur from construction activity as a result of mechanical crushing; loss of nesting, breeding, or basking sites; and human trampling. Indirect effects to these species include increased predation from night lighting, compaction of soils, degradation of water quality, and the introduction of exotic plant species. This impact was found to be consistent for the Project and all alternative routes studied. APMs BIO-8 and BIO-12 have been incorporated into the Project to reduce significant effects to special-status reptile species. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-13. Specifically, the CPUC finds that implementation of Mitigation Measures B-1a and B-3a, described above under Impacts B-1 and B-3, respectively, and B-13a and B-13b below will mitigate significant effects of invasive non-native or noxious plant species from Impact B-13 to a less-than-significant level.

- B-13a Conduct Pre-Construction Surveys and Relocate Sensitive Reptiles.** SCE shall retain a qualified CPUC-approved biologist to conduct pre-construction surveys for sensitive reptiles. The qualified biologist must have an appropriate scientific collecting permit to handle sensitive species likely to occur in the Project area. The authorized biologist will be present during all ground disturbance and construction activities immediately adjacent to or within aquatic or terrestrial habitats that support populations of sensitive reptiles. If sensitive species are detected in the work area during the surveys, the authorized biologist will capture and relocate individuals to suitable undisturbed habitat out of harm's way. All wildlife moved during project activities will be documented by SCE and documentation shall be provided to the CPUC. Any sensitive reptiles killed during construction activities shall be salvaged and deposited in the Santa Barbara Museum of Natural History, Vertebrate Zoology Division collections (contact: Paul Collins, Curator, [805] 682-4711, x-154).
- B-13b Monitor and Relocate Species during Grading of Substation.** In order to salvage sensitive reptiles from the substation site, SCE shall coordinate all initial grubbing and vegetation removal activities with the biological monitor such that biologists can watch these activities and capture and relocate any sensitive reptiles disturbed by this work. At the substation site, SCE shall clear and grub the existing vegetation prior to site grading. If populations of sensitive wildlife are identified SCE shall coordinate with the biological monitor to relocate the species to adjacent habitat. The biologist shall have the authority to halt grading activities to relocate sensitive reptiles from the Project area. SCE shall provide written documentation to the CPUC of any sensitive wildlife identified during clearing or grading, how many were relocated, if any were harmed, and if any additional measures were implemented.

Rationale for Finding. Implementation of the measures outlined in B-1a, B-1b, B-13a, and B-13b will restore all areas disturbed by project construction, including temporary disturbance areas around tower construction sites, the El Casco Substation site, laydown/staging areas, and temporary access and spur roads. In addition, implementation of these mitigation measures will ensure construction control measures to prevent the spread of invasive and noxious weeds, conduct pre-construction surveys and relocate sensitive reptiles, and monitor and relocate species during grading of the El Casco Substation. Together these measures will ensure impacts to the corridor and El Casco Substation site related to special-status reptiles will be mitigated. Therefore, impacts to these species will be reduced a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-14: The Project would result in the loss of burrowing owls

As discussed in Section D.4.5.4 of the original Draft EIR, if burrowing owls are present within a construction zone, or adjacent to such an area, disturbance could destroy occupied burrows or cause the owls to abandon their burrows. Construction during the breeding season could also result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment and would constitute a significant impact. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-4 has been incorporated into the Project to reduce significant effects to burrowing owls through MSHCP compliance. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-14. Specifically, the CPUC finds that implementation of Mitigation Measure B-1b, described above under Impact B-1, will mitigate significant Project effects to burrowing owls from Impact B-14 to a less-than-significant level.

Rationale for Finding. Implementation of Mitigation Measure B-1b will ensure compliance with the MSHCP by requiring that proof of compliance be submitted to the CPUC prior to ground-disturbing activities, which will mitigate effects to burrowing owl as this species is covered under the MSHCP. This measure will ensure impacts to burrowing owls will be reduced a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-15: The Project would result in the loss of foraging habitat or disruption of nesting for special-status raptor species

As discussed in Section D.4.5.4 of the original Draft EIR, construction activities, including the construction of towers, the establishment of staging/laydown facilities, stringing of conductors and fiber optic communications line, construction of the El Casco Substation, and the increased presence of humans may result in direct or indirect impacts to nesting special-status raptor species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-2 has been incorporated into the Project to reduce the possibility of impacts from construction activities during the breeding season for raptors and other migratory birds. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-4. Specifically, the CPUC finds that Mitigation Measure B-4, described above under Impact B-4, will mitigate significant effects to special-status raptors from Impact B-4 to a less-than-significant level.

Rationale for Finding. Conducting protocol level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds, as outlined above in Mitigation Measure B-4, will mitigate impacts to the Project route related to special-status raptors to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-16: The Project would result in the electrocution of special-status bird species

As discussed in Section D.4.5.4 of the original Draft EIR, large, aerial-perching birds such as hawks and eagles are susceptible to electrocution on power lines. However, electrocutions most often occur on lines energized at voltages of 69 kV or less, and risk of electrocution is considered low on subtransmission lines energized at voltages of 115 kV such as the one proposed in this Project. This impact was found to be consistent for the Project and all alternative routes studied. APM BIO-14 has been incorporated into the Project to reduce significant effects to special-status bird species from Impact B-16 to a less-than-significant level. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-9. Specifically, the CPUC finds that implementation of Mitigation Measure B-9, described above under Impact B-9, will mitigate significant Project effects to special-status bird species from Impact B-16 to a less-than-significant level.

Rationale for Finding. By constructing the Project to 2006 APLIC guidelines as outlined above in Mitigation Measure B-9, impacts to special-status bird species from electrocution will be mitigated to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-17: The Project would result in subtransmission line collisions by special-status bird species

As discussed in Section D.4.5.4 of the original Draft EIR, the operation of the Project may result in mortality of listed or sensitive bird species by posing a risk of collision and is a significant impact. This impact was found to be consistent for the Project and all alternative routes studied.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-17. Specifically, the CPUC finds that implementation of Mitigation Measure B-10, described above under Impact B-10, will mitigate significant effects related to bird collisions from Impact B-17 to a less-than-significant level.

Rationale for Finding. By using APLIC standard collision-reducing techniques, as required by Mitigation Measure B-10, impacts to listed bird species will be reduced to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-18: The Project would result in the loss of the American badger

As discussed in Section D.4.5.4 of the original Draft EIR, construction activities including clearing and grading of tower sites could result in impacts to badgers if they are present in the Project alignment. As this species is not covered by the MSHCP, impacts are considered significant. This impact was found to be consistent for the Project and all alternative routes studied.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-18. Specifically, the CPUC finds that implementation of Mitigation Measure B-18 below will mitigate significant effects to the American badger from Impact B-18 to a less-than-significant level.

B-18 Avoid Active Burrows or Nests and Relocate during the Non-Breeding Season. SCE shall retain a qualified biologist to survey and identify any badger dens and wood rat middens located in the Project ROW. Occupied dens/middens shall be flagged for avoidance during construction and a biological monitor shall ensure that construction activities do not disrupt the den. Work can occur within 30 feet of the den/midden outside the breeding season (February–May). If avoidance is not possible SCE shall utilize box traps or other CDFG-approved relocation techniques to relocate the animal. If this is not possible the den/midden shall be slowly excavated (either by hand or mechanized equipment under the direct supervision of the biologist, removing no more than 4” at a time) before or after the breeding season (February-May) in an effort to relocate the animal. Any relocation of badgers shall occur only after consultation with the CDFG and CPUC monitor. Wood rat middens shall be relocated to suitable habitat as close as possible to the previous location.

Rationale for Finding. Implementation of Mitigation Measure B-18 will ensure surveying for and avoiding badger dens or relocating badgers should they be present in the ROW. This measure will ensure impacts to the American badger will be reduced to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-19: The Project would result in loss of special-status rodent species.

As discussed in Section D.4.5.4 of the original Draft EIR, construction activities, including the construction of towers, the establishment of staging/laydown facilities, stringing of conductors and fiber optic communications line, construction of the El Casco Substation, and the increased presence of humans may result in direct or indirect impacts to special-status rodent species that may occur in the ROW. This impact was found to be consistent for the Project and all alternative routes studied.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-19. Specifically, the CPUC finds that implementation of Mitigation Measures B-1b, described under Impact B-1, and B-19 below will mitigate significant effects to the special-status rodent species from Impact B-19 to a less-than-significant level.

B-19 Avoid Burrow Areas. SCE shall retain a qualified biologist to survey small mammal burrow densities for Los Angeles Pocket mouse in proposed work areas. Small mammal burrow densities shall be mapped as “low”, “medium”, and “high-density” on aerial maps of the Project alignment, and areas with a “high density” of burrows shall be flagged for avoidance during construction. The biologist shall monitor construction in these areas and work with equipment operators to avoid areas of high burrow densities during access to the site. If high burrow density areas cannot be avoided, then a qualified small mammal biologist shall live-trap target species out of these specific areas and close burrows for the duration of construction activities in that immediate area. If the 90 percent avoidance threshold is met for the pocket mouse or the Determination of Biologically Equivalent or Superior Preservation is provided this mitigation would defer to the MSHCP requirements.

Rationale for Finding. Implementation of Mitigation Measures B-1b and B-18 will ensure compliance with the MSHCP and avoidance of high-density Los Angeles pocket mouse burrow areas or relocation of this species should they be present in the ROW. This measure will ensure impacts to the special-status rodent species will be reduced a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-20: The Project would result in the loss of jurisdictional waters and wetlands

As described in Section D.4.5.5 of the original Draft EIR, several waterways cross the Project area including San Timoteo Creek, Potrero Creek, Smith Creek, Montgomery Creek, and various unnamed blue-line streams and ephemeral drainages. SCE conducted a formal wetland delineation of jurisdictional waters and indicated that approximately 0.08 acre of USACE non-wetland waters and 0.04 acre of USACE wetland waters are expected to be temporarily impacted by the Project. Additionally, approximately 0.001 acre of USACE non-wetland waters would be permanently impacted within an unnamed ephemeral drainage located approximately 400 feet east of the intersection of Bobcat Road and Turtle Dove Lane in unincorporated Riverside County south of the City of Banning. No USACE wetland waters are expected to be permanently impacted by Project activities. Approximately 0.75 acre and 0.043 acre of CDFG jurisdictional waters and associated riparian habitat are expected to be temporarily and permanently impacted by the Project, respectively, in the same locations described above. APM BIO-8 has been incorporated into the Project to reduce impacts to Jurisdictional Waters and Wetlands. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-20. With implementation of Mitigation

Measures B-1a and B-1b, under Impact B-1, above, the CPUC finds that significant Project effects to Jurisdictional Waters and Wetlands from Impact B-20 will be reduced to a less than significant level.

Rationale for Finding. Preparing and implementing a Habitat Restoration/Compensation Plan, as outlined in Mitigation Measure B-1a, and ensuring compliance with the MSHCP and acquisition of all regulatory permits as outlined in Mitigation Measure B-1b will compensate all Jurisdictional Waters and Wetlands potentially impacted and will reduce impacts to Jurisdictional Waters and Wetlands to a less than significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-21: The Project would result in the loss or restriction of habitat connectivity in Constrained Linkage 22

As discussed in Section D.4.5.6 of the original Draft EIR, the construction of the El Casco Substation would result in the loss of habitat adjacent to San Timoteo Creek and could further degrade the already restricted corridors that occur in this area. APMs BIO-4, BIO-5 and BIO-7 have been incorporated into the Project to reduce impacts to wildlife movement corridors. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-21. Specifically, the CPUC finds that implementation of Mitigation Measures B-1a and B-1b, under Impact B-1, above, and B-5a, B-5b, and B-5c, under Impact B-5, above, will reduce Project impacts to less-than-significant levels.

Rationale for Finding. Restoring all areas disturbed by Project construction, complying with the MSHCP, reducing noise during construction, controlling lighting at the Substation, and scheduling maintenance during daylight hours as outlined above in B-1a, B-1b, B-5a, B-5b, and B-5c will mitigate the impacts to wildlife at the El Casco Substation site to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Impact B-22: The Project would conflict with the MSHCP

As discussed in Section D.4.5.7 of the original Draft EIR, the Project would traverse the jurisdiction of the Western Riverside County MSHCP. Section 6.3.2 of the MSHCP suggests that additional surveys may be needed for certain species in conjunction with Plan implementation in order to achieve coverage for these species. For locations with positive survey results for any species addressed in Section 6.3.2 of the MSHCP, 90 percent of those portions of the property that provide for long-term conservation value for the identified species shall be avoided until it is demonstrated that conservation goals for the particular species are met. The Project lies within areas identified as having habitat for MSHCP species of concern within the survey area boundaries. To reduce potential conflict with the MSHCP, APM BIO-4 has been incorporated into the Project. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact B-22. Specifically, the CPUC finds that Mitigation Measures B-1a, B-1b, B-5a, B-5b, and B-5c will reduce impacts related to conflict with the MSHCP to a less-than-significant level.

Rationale for Finding. By demonstrating compliance with the Western Riverside County MSHCP, as is required under Mitigation Measure B-1b, impacts would be less-than-significant. In addition, implementation of the Habitat Restoration/Compensation Plan, minimization of construction noise levels, regulation of night lighting, and scheduling maintenance during daylight hours, as outlined above in Mitigation Measures B-1a, B-5a, B-5b, and B-5c, will reduce Project conflict with the MSHCP to a less-than-significant level.

Reference. Original Draft EIR Section D.4 provides a complete assessment of the biological resources impacts of the Project.

Cumulative Biological Resources Impacts: Cumulative project activities would conflict with the MSHCP (B-22)

As discussed in Section F.1.5.3 (Cumulative Impact Analysis – Biological Resources) of the original Draft EIR, the Project will not be in conflict with the existing MSHCP provided SCE complies with the provisions identified in the EIR. However, it is not known whether or not the various projects identified in Table F-2 are in compliance with the provisions identified in the plan. As the Project will be in compliance with the MSHCP it is unlikely that it would cumulatively combine with other projects and conflict with the plan. APM BIO-4 has been incorporated into the Project to reduce the cumulative potential conflict with the MSHCP associated with the Project. A complete description of APMs applicable to Biological Resources is located in original Draft EIR Table D.4-5. When combined with impacts from past, present, or reasonable future projects, these impacts are not cumulatively significant.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant cumulative effects on the environment from Impact B-22. Specifically, the CPUC finds that Mitigation Measures B-1a, B-1b, B-5a, B-5b, and B-5c will reduce impacts related to cumulative conflict with the MSHCP to a less-than-significant level.

Rationale for Finding. The combined construction effects of multiple projects could be cumulatively significant at various times during construction. However, the Project's contribution to this impact will be less than cumulatively considerable because the Project will be in compliance with the MSHCP. Mitigation Measures B-1a, B-1b, B-5a, B-5b, and B-5c will reduce the potential for conflict with the MSHCP through implementation of the Habitat Restoration/Compensation Plan, ensuring MSHCP compliance before any ground disturbance, minimization of construction noise levels, regulation of night lighting, and scheduling maintenance during daylight hours.

Reference. Section F.1.5.3 (Biological Resources) of the original Draft EIR provides a complete assessment of the cumulative impact on biological resources. Section D.3 (Biological Resources) of the original Draft EIR provides a detailed description of the effects of the Project on biological resources.

IV.2.3 Cultural and Paleontological Resources

As discussed in Section D.5 (Cultural and Paleontological Resources) of the original Draft EIR, record searches were conducted consisting of a review of relevant historic maps, excavation and survey reports, and paleontological data. Abundant cultural and paleontological resources data for the Project were available in archival facilities and in existing reports as a result of previous studies conducted in the area. Supplemental field surveys were conducted in order to verify the location of any previously identified cultural resources and to cover previously unsurveyed lands within the project study area. For the purposes of the analysis in the EIR and based on CEQA requirements, cultural resources are defined as any object or specific location of past human activity, occupation, or use, identifiable through historical documentation, inventory, or oral evidence. These resources may include buildings and architectural remains, archaeological sites and other artifacts that provide evidence of past human activity, human

remains, or a traditional cultural property (TCP). A paleontological resource is a locality containing vertebrate, invertebrate, or plant fossils (i.e., fossil location, fossil bearing formation or a formation with the potential to bear fossils). The paleontological resources are considered a fragile and nonrenewable scientific record of the history of life on earth, and so represent an important and critical component of America's natural heritage.

Impact CR-1: Project construction has the potential to affect known archaeological resources

As discussed in Section D.5.3.3 of the original Draft EIR, any ground-disturbing activity, including tower pad preparation and construction, substation construction, grading of new access or spur roads, reconductoring activity, tower removal, transportation, storage, and maintenance of construction equipment and supplies, staging area and material yard preparation and use, and use or improvement of existing access roads has the potential to disturb known archeological resources. Inadvertent impacts may occur to known archaeological resources within and in the vicinity of the project area during construction and during activities associated with transportation, storage, and maintenance of construction equipment and supplies. Impacts could also result from inadvertent or malicious vandalism or unauthorized collection of cultural resources on the surface of sites. APMs CUL-3 and CUL-4 have been incorporated into the Project to reduce impacts to archeological resources. A complete description of APMs applicable to Cultural Resources is located in original Draft EIR Table D.5-9.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact CR-1 to a less-than-significant level. These measures, identified as CR-1a through CR-1c, are included below.

CR-1a Avoid Environmentally Sensitive Areas. SCE shall perform pre-construction surveys for any project areas not yet surveyed (e.g., new or modified staging areas or pull sites). Resources discovered during those surveys would be subject to Mitigation Measures CR-1b (Cultural Resources Treatment Plan [CRTP]) and CR-1c (Construction Monitoring). Newly discovered and previously known prehistoric and historic archaeological sites located within, or just outside, of the project Area of Potential Effect (APE) shall be designated as Environmentally Sensitive Areas (ESAs). Construction personnel shall be instructed how to avoid ESAs.

All construction personnel shall be trained regarding the recognition of possible buried cultural remains, including prehistoric and historic resources during construction, prior to the initiation of construction or ground-disturbing activities. SCE shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of archaeological materials, including Native American burials.

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so that they are aware of the potential for inadvertently exposing buried archaeological deposits.

SCE shall provide a background briefing for supervisory construction personnel describing the potential for exposing cultural resources, the location of any potential ESA, and anticipated procedures to treat unexpected discoveries.

CR-1b Cultural Resources Treatment Plan (CRTP). SCE shall develop a Cultural Resources Treatment Plan (CRTP) for all known and newly discovered cultural resources within areas of direct impact of project activities, including:

- Procedures for protection and avoidance of ESAs, evaluation and treatment of the unexpected discovery of cultural resources including Native American burials;
- Provisions and procedures for Native American consultation--specifically with Morongo Band of Mission Indians;

- Detailed reporting requirements by the project Archaeologist;
- Notification of the Morongo Band of Mission Indians upon discovery of human remains;
- Consultation with Morongo Band of Mission Indians to determine disposition of any cultural materials collected during the project; and
- Requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California Office of Historic Preservation (OHP).

Implementation of the CRTP shall ensure that known and recorded cultural resources will be avoided during construction and operation and maintenance. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any presently undetected cultural resources to less-than-significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 30 days before the start of construction.

The CRTP shall define construction procedures for areas near known/recorded cultural sites. Wherever a tower, access road, equipment, etc., must be placed or accessed within 100 feet of a recorded, reported, or known archaeological site eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an ESA (without disclosure of the exact nature of the environmental sensitivity [i.e., the ESA is not identified as an archaeological site]). Construction equipment shall then be directed away from the ESA, and construction personnel shall be directed not to enter the ESA. Archaeological monitoring of project construction shall be focused in the immediate vicinity of the designated ESAs.

CR-1c Construction Monitoring. Archaeological monitoring shall be conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could be encountered along the subtransmission line corridor. Monitoring shall occur in all areas of ground disturbing activity that occur within 100 feet of a cultural resource ESA, and during removal of all sediments above bedrock at the El Casco Substation site. The qualifications of the principal archaeologist shall be approved by the CPUC. Intermittent monitoring may occur in areas of moderate archaeological sensitivity after consultation and approval from the CPUC Lead Environmental Monitor. A Native American monitor is required at all culturally sensitive locations, as specified in the CRTP.

Rationale for Finding. Project effects will be reduced to a less-than-significant level by the avoidance and protection activities listed in the mitigation measures above; this is the preferred treatment for all cultural resources. Once final design is completed and APE locations have been determined, additional surveys and evaluations will occur as discussed in Mitigation Measure CR-1a (Inventory and evaluate cultural resources in Final APE). If cultural resources are identified through additional surveys or construction activities, then SCE will implement Mitigation Measure C-1b (Cultural Resources Treatment Plan) to ensure discovery, evaluation, and treatment of unknown buried prehistoric and historical archaeological sites. CR-1c will ensure that construction monitoring for cultural resources will occur in all areas of ground disturbance that occur within 100 feet of a cultural resource ESA, and during grading at the El Casco Substation site.

Reference. Section D.5 (Cultural and Paleontological Resources) of the original Draft EIR provides a complete assessment of the construction-related impacts of the Project on cultural resources.

Impact CR-2: *Unanticipated archaeological discoveries may be damaged or destroyed during Project construction*

As discussed in Section D.5.3.3 of the original Draft EIR, any ground-disturbing activity, including tower pad preparation and construction, construction of the El Casco Substation, grading of new access or spur

roads, reconductoring activity, tower removal, transportation, storage, and maintenance of construction equipment and supplies, staging area and material yard preparation and use, and use or improvement of existing access roads has the potential to disturb previously unknown archaeological resources. Impacts could also result from inadvertent trespass out of designated work areas or roads. APM CUL-3 has been incorporated into the Project to reduce impacts to unanticipated archeological resources. A complete description of APMs applicable to Cultural Resources is located in original Draft EIR Table D.5-9.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact CR-2. Specifically, Mitigation Measures CR-1a, CR-1c (identified above) and CR-2 below will reduce Impact CR-2 to a less-than-significant level.

CR-2 Treatment of New Discoveries. Upon discovery of potential buried cultural materials, work in the immediate area of the find shall be halted and SCE's archaeologist notified. Once the find has been identified, SCE's archaeologist will make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the finds are found to be historically significant according to CEQA (CEQA Guidelines Section 15064.5 [a]).

Rationale for Finding. Mitigation Measure CR-2 ensures that unanticipated cultural materials discovered during construction will be identified and treated appropriately as determined by SCE's archaeologist. Mitigation Measure CR-1a requires avoidance of environmentally sensitive areas and ensures that there are no inadvertent impacts to known or newly discovered cultural resources. Mitigation Measure CR-1c ensures construction monitoring for archeological resources throughout construction. Thus, impacts to unanticipated archeological discoveries will be less than significant.

Reference. Section D.5 (Cultural and Paleontological Resources) of the original Draft EIR provides a complete assessment of the Project impacts on unanticipated archaeological discoveries.

Impact CR-3: Project construction would affect significant paleontological resources

As discussed in Section D.5.3.3 (Cultural and Paleontological Resources) of the original Draft EIR, impacts will occur to paleontological resources within portions of the Project where construction activities excavate sensitive sedimentary units. Excavation of tower pads and footings and excavation and grading at the El Casco Substation site will be a significant impact. APMs PALEO-1 through PALEO-6 have been incorporated into the Project to reduce impacts to paleontological resources. A complete description of APMs applicable to Cultural and Paleontological Resources is located in original Draft EIR Table D.5-9.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project, which mitigate significant effects on the environment from Impact CR-3. These measures, identified as CR-3a, CR-3b, CR-3c, CR-3d, and CR-3e included below will reduce Impact CR-3 to a less-than-significant level.

CR-3a Inventory Paleontological Resources in Final APE. Prior to construction, SCE shall conduct and submit for approval to the CPUC an inventory of potentially significant paleontological resources, based, in part, on field inspection of areas of high or undetermined paleontological sensitivity that would be affected by the project.

CR-3b Develop Paleontological Monitoring and Treatment Plan. SCE shall, upon approval of the paleontological inventory report by the CPUC, prepare and submit for approval a plan to mitigate identified impacts. The Paleontological Monitoring and Treatment Plan shall identify construction impact areas with high potential for encountering significant resources and the depths at which those resources are likely to be discovered. The Plan shall outline a coordination strategy to ensure that all construction disturbance in high sensitivity sediments would be monitored full-time by qualified professionals. The Plan shall also detail methods of recovery; post-excavation preparation

and analysis of specimens; final curation of specimens at a recognized, accredited facility; data analysis; and reporting. The Plan shall also specify a program of sample collection prior to construction, including water washing to recover small vertebrate fossils (as defined by the Society of Vertebrate Paleontologists).

CR-3c Monitor Construction for Paleontology. Based on the paleontological sensitivity assessment and Monitoring and Treatment Plan consistent with Mitigation Measure CR-3b (Develop Paleontological Monitoring and Treatment Plan), SCE shall conduct full-time construction monitoring in areas where and when sediments of high paleontological sensitivity would be disturbed. Construction activities shall be diverted when data recovery of significant fossils is warranted.

CR-3d Conduct Paleontological Data Recovery. If avoidance of significant paleontological resources is not feasible or appropriate, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) shall be carried out by SCE, in accordance with the approved Treatment Plan per Mitigation Measure CR-3b (Develop Paleontological Monitoring and Treatment Plan).

CR-3e Train Construction Personnel. All construction personnel shall be trained regarding the recognition of possible buried paleontological resources and protection of all paleontological resources during construction, prior to the initiation of construction or ground-disturbing activities. SCE shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials.

Upon discovery of potential buried paleontological materials by paleontologists or construction personnel, work in the immediate area of the find shall be diverted and SCE's paleontologist notified. Once the find has been inspected and a preliminary assessment made, SCE's assigned paleontologist or paleontological representative shall notify the CPUC and proceed with data recovery in accordance with the approved Treatment Plan consistent with Mitigation Measure CR-3b (Develop Paleontological Monitoring and Treatment Plan).

Rationale for Finding. Mitigation Measure CR-3a requires inventory of paleontological resources once a final APE has been established to ensure that paleontological resources are avoided to the greatest extent feasible. Mitigation Measures CR-3b through CR-3e provide for the discovery and treatment of significant fossil remains in the event that they are encountered during construction and provide training so that construction personnel can recognize potential paleontological finds. Together, these measures reduce Project effects to paleontological resources to a less-than-significant level.

Reference. Section D.5 (Cultural and Paleontological Resources) of the original Draft EIR provides a complete assessment of Project impacts on paleontological resources.

Cumulative Cultural and Paleontological Resources Impacts: Cumulative project activities would cause impacts to known or unknown archaeological (CR-1 and CR-2) or paleontological resources (CR-3)

There are approximately 180 projects in the planning or construction phases within a two-mile-wide corridor surrounding the Project that have the potential to adversely affect cultural resources. As discussed in original Draft EIR Section D.5, inadvertent impacts may occur to archaeological (CR-1 and CR-2) and paleontological (CR-3) resources within and in the vicinity of the project area during construction. This impact is significant, but is mitigable to less than significant levels with implementation of APMs CUL-1 through CUL-4 and PALEO-1 through PALEO-6, and Mitigation Measures CR-1b, CR-1c, and CR-2, and CR-3a through CR-3e. Therefore, the Project's cumulative contribution to impacts to cultural resources within the geographic scope area will be less than significant.

Finding. The CPUC finds changes or alterations have been incorporated into the Project which mitigate or avoid its significant effects. Specifically, Mitigation Measures CR-1a, 1b, 1c, 2, and 3a-e, listed above, will reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Rationale for Finding. There is a possibility that a variety of projects will occur at the same time as construction of the Project. Cultural Resources impacts from construction of these projects could result in an increase to adjacent land disturbance that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could further exacerbate the significant project-related Cultural Resources impacts. However, implementation of required APMs (CUL-1 through CUL-4 and PALEO-1 through PALEO-6) and Mitigation Measures CR-1a, 1b, 1c, 2, and 3a-e listed above, will ensure that the Project's contribution to any significant cumulative impacts to cultural resources will be less than cumulatively considerable.

Reference. Section F.1.5.4 (Cumulative Impact Analysis – Cultural Resources) of the original Draft EIR provides a complete assessment of the cumulative impact on cultural resources. Section D.5 (Cultural Resources) of the original Draft EIR provides a detailed description of the effects of the Project on Cultural Resources.

IV.2.4 Geology and Soils

The CPUC examined the regional topography, geology, seismicity, and soils in the Project area, by collecting baseline geologic information from published and unpublished geologic, seismic, and geotechnical literature. The literature review was supplemented by a field reconnaissance of the routes studied in the EIR. The literature review and field reconnaissance focused on the identification of specific geologic hazards.

Impact GEO-1: Construction activities would cause slope instability

As discussed in Section D.6.3.3 of the original Draft EIR, destabilization of natural or constructed slopes could occur as a result of construction activities due to excavation and/or grading operations. The proposed 115 kV subtransmission route crosses terrain that ranges from flat to 25 percent slopes. The proposed El Casco Substation site and much of the subtransmission line route are underlain by the San Timoteo Formation, which has been subject to numerous landslides. Preparation of the proposed El Casco Substation site would include excavation that intercepts landslide failure surface, thus increasing the possibility of slope failures. Therefore, proposed cut slopes could result in slope failures during construction. Unmapped landslides and areas of localized slope instability may also be encountered along other portions of the subtransmission line that cross the hills and slopes between the proposed El Casco Substation and MP-4.

Excavation operations associated with tower foundation construction and grading operations for temporary and permanent access roads and construction activities in areas of hilly or sloping terrain could result in increased slope instability, landslides, soil creep, or debris flows during construction. APM GEO-1 has been incorporated into the Project to reduce impacts to geology and soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-1 to a less-than-significant level. This mitigation measure, identified as GEO-1, is included below.

GEO-1 Protect Against Slope Instability. Appropriate support and protection measures shall be implemented to maintain the stability of excavations and protect surrounding structures and utilities to limit ground deformation. Design-level geotechnical investigations shall be performed

to evaluate subsurface conditions, identify potential hazards, and provide information for development of excavation plans and procedures. Based on the results of the geotechnical investigations, appropriate support and protection measures shall be designed and implemented to maintain the stability of slopes adjacent to newly graded or re-graded access roads and work areas during and after construction. These measures shall include, but are not limited to, retaining walls, visqueen, removal of unstable materials, and avoidance of highly unstable areas. SCE shall document compliance with this measure prior to the start of construction by submitting a report to the CPUC for review and approval. The report shall document the investigations and detail the specific support and protection measures that will be implemented.

Rationale for Finding. Mitigation Measure GEO-1 will ensure that appropriate geotechnical investigations are performed and that appropriate support and protection measures are implemented to maintain slope stability where necessary. This measure will reduce slope instability impacts to less than significant.

Reference. Section D.6 (Geology and Soils) of the original Draft EIR provides a complete assessment of the Geology and Soils impacts of the Project.

Impact GEO-2: Construction activities would accelerate erosion

As discussed in D.6.3.3 of the original Draft EIR, excavation and grading for tower and substation foundations, work areas, and access roads could loosen soil or remove stabilizing vegetation and expose areas of loose soil. These areas, if not properly stabilized during construction, could be subject to increased soil loss and erosion by wind and stormwater runoff. Newly constructed and compacted engineered slopes can also undergo substantial erosion through dispersed sheet flow runoff. More concentrated runoff can result in the formation of small erosional channels and larger gullies, each compromising the integrity of the slope and resulting in significant soil loss. The Maraschino Loop West and South, as well as approximately 40 percent of the proposed 115 kV subtransmission line route, are underlain by soils with a moderate potential for erosion.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-2 to a less-than-significant level. This mitigation measure, identified as GEO-2, is included below.

GEO-2 Minimize Soil Erosion. The Construction SWPPP for the Project shall include BMPs designed to minimize soil erosion along access roads and at work areas. Appropriate BMPs may include construction of water bars, grading road surfaces to direct flow away from natural slopes, use of soil stabilizers, and consistent maintenance of roads and culverts to maintain appropriate flow paths. Silt fences and straw bales installed during construction shall be removed to restore natural drainage during the cleanup and restoration phase of the Proposed Project. Where access roads cross streams or drainages, they shall be built at or close to right angles to the streambeds and washes and culverts or rock crossings shall be used to cross streambeds and washes. Design of appropriate BMPs should be conducted by or under the direction of a qualified geologist or engineer.

Rationale for Finding. Implementation of a Stormwater Pollution Prevention Plan (SWPPP) will generally limit erosion from construction activities. However, the inclusion of BMPs as identified in Mitigation Measure GEO-2, such as use of soil stabilizers and building access roads at right angles to streambeds and washes, would reduce erosion effects to less than significant through a reduction in soil movement.

Reference. Section D.6 (Geology and Soils) of the original Draft EIR provides a complete assessment of the Geology and Soils impacts of the Project.

Impact GEO-3: Project structures would be damaged by corrosive soils

Soils with moderate to high potential for corrosion exist along the proposed route. Corrosive soils could have a detrimental effect on concrete and metals. Depending on the degree of corrosivity of subsurface soils, concrete, reinforcing steel in concrete structures, and bare-metal structures exposed to these soils could deteriorate, eventually leading to structural failures. APM GEO-1 has been incorporated into the Project to reduce impacts to geology and soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-3 to a less-than-significant level. This mitigation measure, identified as GEO-3, is included below.

GEO-3 Geotechnical Studies for Corrosive Soils. In areas underlain by potentially corrosive soils, the design-level geotechnical studies performed by SCE shall identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates, and soil parameters, such as pH and electrical resistivity. Appropriate design measures for protection of reinforcement, concrete, and metal-structural components against corrosion shall be utilized, such as use of corrosion-resistant materials and coatings, increased thickness of Project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems.

Rationale for Finding. Implementation of Mitigation Measure GEO-3 will ensure detailed geotechnical studies are performed and appropriate Project design measures are utilized. This will reduce impacts related to corrosive soils to a less-than-significant level.

Reference. Section D.6 (Geology and Soils) of the original Draft EIR provides a complete assessment of the Geology and Soils impacts of the Project.

Impact GEO-4: Project structures would be damaged by unstable soils, landslides, earthflows, and/or debris flows

As discussed in D.6.3.3 of the original Draft EIR, the El Casco Substation site, the Mill Creek Communications site, and portions of the proposed 115 kV subtransmission route are located on or cross sloping areas that are underlain by geologic formations prone to landslides (San Timoteo Formation and Potato Sandstone). These same areas also traverse existing landslides or are situated near existing landslides. Slope instability including landslides, earth flows, and debris flows, has the potential to undermine foundations, cause distortion and distress to overlying structures, and displace or destroy Project components. APM GEO-1 has been incorporated into the Project to reduce impacts to geology and soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-4 to a less-than-significant level. This mitigation measure, identified as GEO-4, is included below.

GEO-4 Geotechnical Surveys for Landslides. The design-level geologic/geotechnical investigation performed by SCE shall include detailed surveys to evaluate the potential for unstable slopes, landslides, earth flows, and debris flows along the approved subtransmission line route and in the vicinity of other Project facilities. Based on these surveys, approved Project facilities shall be located away from known landslides, very steep hillsides, debris-flow source areas, the mouths of

steep sidehill drainages, and the mouths of canyons that drain steep terrain. Where these landslide hazard areas cannot be avoided, appropriate engineering design and construction measures shall be incorporated into the Project designs to minimize potential for damage to Project facilities.

Rationale for Finding. Implementation of Mitigation Measure GEO-4 will ensure detailed geotechnical studies are performed and appropriate Project design measures are utilized. This will reduce impacts related to unstable soils, landslides, earth flows, and debris flows to a less-than-significant level.

Reference. Original Draft EIR Section D.6 (Geology and Soils) of the EIR provides a complete assessment of the Geology and Soils impacts of the Project.

Impact GEO-5: Project structures would be damaged by seismically induced groundshaking and ground failure, including liquefaction and lateral spreading

As discussed in D.6.3.3 of the original Draft EIR, Seismically induced ground failure caused by groundshaking, which includes liquefaction and lateral spreading, could potentially cause damage to project facilities. It is likely that the Project facilities would be subjected to at least one moderate or larger earthquake occurring close enough to produce strong groundshaking in the Project area. Although SCE plans to perform geotechnical studies to identify site-specific geologic conditions prior to final design of substation facilities and subtransmission line tower foundations (APM GEO-2), this impact would be significant without mitigation.

Liquefaction occurs in low-lying areas where saturated non-cohesive sediments are found. The soils beneath the El Casco Substation and Banning Substation sites have moderate potential for liquefaction, as do portions of the subtransmission line route between MP-3.5 to MP-5.5 and between MP-12 to MP-13.9, and both Maraschino Loop routes. Lateral spreading occurs along waterfronts or canals where non-cohesive soils could move out along a free-face. APM GEO-2 has been incorporated into the Project to reduce impacts to geology and soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-5 to a less-than-significant level. These measures, identified as GEO-5a and GEO-5b, are included below.

GEO-5a Reduce Effects of Groundshaking. The design-level geotechnical investigations performed by SCE shall include site-specific seismic analyses to evaluate the peak ground accelerations for design of Project components. The Applicant shall follow the Institute of Electrical and Electronics Engineers (IEEE) 693 “Recommended Practices for Seismic Design of Substations,” which has specific requirements to mitigate the types of damage that equipment at substations have had in the past from such seismic activity. These design guidelines shall be implemented during construction of substation modifications.

GEO-5b Protect Against Liquefaction and Lateral Spreading. Since seismically induced ground failure has the potential to damage or destroy Project components, SCE shall perform design-level geotechnical investigations to assess the potential for liquefaction and lateral spreading hazards to affect the approved Project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the Project designs. Appropriate measures include construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in underground cables to allow ground deformations without damage to structures. SCE shall submit a report of the required investigations to the CPUC for review and approval at least 60 days before construction.

Rationale for Finding. Implementation of Mitigation Measures GEO-5a and GEO-5b will ensure detailed geotechnical studies are performed and appropriate Project design measures are utilized. This will reduce impacts related to seismically induced ground shaking and failure to a less-than-significant level.

Reference. Original Draft EIR Section D.6 (Geology and Soils) of the EIR provides a complete assessment of the Geology and Soils impacts of the Project. See also original Final EIR response to comment E3-21.

Impact GEO-6: Project structures would be damaged by surface fault rupture at crossings of active and potentially active faults

As discussed in D.6.3.3 of the original Draft EIR, the proposed 115 kV subtransmission line route crosses two traces of the Beaumont Plain Fault Zone at MP-6.58 and MP-7.9. The proposed Maraschino Loop West and Maraschino Loop South cross a trace of the same fault zone at MP-0.76 and MP-0.23, respectively, as shown in Figures D.6-2a and D.6-2b of the Draft EIR. This fault is considered active but is not within a mapped Alquist-Priolo zone. A portion of the fiber optic cable route would be located within the Alquist-Priolo fault zone of the San Andreas Fault just east of the Zanja Substation. This portion of the route would also cross the Crafton Hills Fault. Both faults are considered active. APMs GEO-2 and GEO-3 have been incorporated into the Project to reduce impacts to geology and soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-6 to a less-than-significant level. This mitigation measure, identified as GEO-6, is included below.

GEO-6 Minimize Project Structures within Active Fault Zones. Perform a geologic study to confirm location of active and potentially mapped traces of the Beaumont Plain, San Andreas, and Crafton Hills faults where crossed by the Project alignment. Tower locations shall be adjusted as necessary to avoid placing tower footings on or across mapped fault traces. Towers on either side of a fault shall be designed to provide a significant amount of slack to allow for potential fault movement and ground surface displacement.

Rationale for Finding. Implementation of Mitigation Measure GEO-6 will ensure detailed geotechnical studies are performed and Project structures are placed outside of active fault traces. This will reduce impacts related to surface fault ruptures to a less-than-significant level.

Reference. Original Draft EIR Section D.6 (Geology and Soils) of the EIR provides a complete assessment of the Geology and Soils impacts of the Project.

Impact GEO-7: Expansive, soft, loose and/or compressible soils would damage Project structures

As discussed in D.6.3.3 of the original Draft EIR, problematic soils can cause construction and maintenance hazards. Expansive-soil, or shrink-swell behavior is a condition in which clay-rich soils react to changes in moisture content by expanding or contracting. Most of the soils beneath the proposed subtransmission line route and substation sites have low potential for expansion (shrink-swell); however, three soils types found along the subtransmission line route have moderate potential for expansion. Expansive soils may cause differential and cyclical foundation movements that can cause damage and/or distress to structures and equipment. Potential operation impacts from loose sands, soft clays, and other potentially compressible soils include excessive settlement, low foundation-bearing capacity, and limitation of year-round access to Project facilities. APM GEO-1 has been incorporated into the Project to reduce impacts to geology and

soils. A complete description of APMs applicable to Geology and Soils is located in original Draft EIR Table D.6-6.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact GEO-7 to a less-than-significant level. This mitigation measure, identified as GEO-7, is included below.

GEO-7 Implement Standard Engineering Methods for Problematic Soils. SCE shall perform design-level geotechnical studies to identify areas with potentially problematic soils and develop appropriate design features, including excavation of potentially problematic soils during construction and replacement with engineered backfill, ground-treatment processes, redirection of surface water, and drainage away from expansive foundation soils. Study results and proposed solutions shall be provided to the CPUC for review and approval at least 60 days prior to commencement of construction.

Rationale for Finding. Implementation of Mitigation Measure GEO-7 will ensure detailed geotechnical studies are performed and Project structures are engineered to withstand stresses caused by problematic soils. This will reduce impacts related to expansive, soft, loose, and/or compressible soils to a less-than-significant level.

Reference. Original Draft EIR Section D.6 (Geology and Soils) of the EIR provides a complete assessment of the Geology and Soils impacts of the Project.

IV.2.5 Hazards and Hazardous Materials

The Hazards and Hazardous Materials section of the original Draft EIR analyzed the effects of the Project for two issues. Sections D.7.3 through D.7.6 examined the potential for environmental contamination and hazardous materials as a result of the Project in Impacts HAZ-1 through HAZ-8, while Section D.7.8 addresses concerns about electric and magnetic fields and other electrical field issues in Impacts HAZ-9 through HAZ-12. To evaluate the effects of environmental contamination and hazardous materials, the CPUC examined the existing and past land uses traversed by the Project and reviewed environmental databases listing known active hazardous waste sites. The examination of electric and magnetic fields and other electrical field issues was based on magnetic field computer modeling results for the length of the Project.

Impact HAZ-1: The project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

As discussed in Section D.7.3.3 of the original Draft EIR, hazardous or flammable materials used during construction of the Project would consist primarily of vehicle fuel and oil for construction equipment. A release or spill of these materials during construction could create a hazard to the public or the environment through contamination of soil or groundwater, toxic emissions, or increased risk of fire ignition. APM HAZ-1 has been incorporated into the Project to reduce impacts related to hazards and hazardous materials. A complete description of the APM applicable to Hazards and Hazardous Materials is located in original Draft EIR Table D.7-1.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-1. These mitigation measures are identified as HAZ-1a, HAZ-1b, and HAZ-1c, and are included below.

HAZ-1a Environmental Training and Monitoring Program. An environmental training program shall be established to communicate environmental concerns and appropriate work practices, including spill prevention, emergency response measures, and proper Best Management Practice

implementation to all construction and maintenance personnel. The training program will emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of potentially hazardous substances) and will include a review of all site-specific plans, including but not limited to, the Proposed Project's Stormwater Pollution Prevention Plan (SWPPP); and Spill Prevention, Control, and Countermeasures Plan (SPCC).

A monitoring program shall also be implemented to ensure that the plans are followed throughout the period of construction. Best Management Practices, as identified in the Proposed Project SWPPP, shall also be implemented during the construction of the Proposed Project to minimize the risk of an accidental release and provide the necessary information for emergency response.

HAZ-1b Proper Disposal of Construction Waste. All construction and demolition waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials.

HAZ-1c Emergency Spill Supplies and Equipment. Hazardous material spill kits shall be maintained on site for small spills. This shall include oil-absorbent material, tarps, and storage drums to be used to contain and control any minor releases. Emergency spill supplies and equipment will be kept adjacent to all areas of work and in staging areas, and will be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials will be provided in the Proposed Project's Spill Prevention, Control, and Countermeasures Plan.

Rationale for Finding. Implementation of Mitigation Measures HAZ-1a, HAZ-1b, and HAZ-1c would ensure workers are properly trained in appropriate work practices, construction waste is disposed of properly, and emergency spill supplies and equipment are readily available during construction of the Project. Together these measures would reduce impacts from hazardous materials to a less-than-significant level.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to hazards and hazardous materials.

Impact HAZ-2: The project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

As discussed in Section D.7.3.3 of the original Draft EIR, construction of the Project would involve the use of several hazardous materials that could accidentally be released during construction activities. The types of materials that could be released include diesel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, and lubricating grease from vehicles or other motorized equipment. In addition, a release of liquid concrete during construction of the pole foundations is also possible. If soil contamination were present within a construction area, the contaminated soils disturbed or excavated during construction activities could pose a potential health risk to construction workers and/or the public through airborne or physical exposure to contaminants.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-2. These mitigation measures are identified as HAZ-1a, HAZ-1b, and HAZ-1c, and are included above under Impact HAZ-1.

Rationale for Finding. Implementation of Mitigation Measures HAZ-1a, HAZ-1b, and HAZ-1c would ensure workers are properly trained in appropriate work practices, construction waste is disposed of properly, and emergency spill supplies and equipment are readily available during construction of the

Project. Together these measures would reduce impacts from hazardous materials to a less-than-significant level.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to hazards and hazardous materials.

Impact HAZ-3: The project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

As discussed in Section D.7.3.3 of the original Draft EIR, Banning High School is located 0.25 mile from the proposed subtransmission line route. Hazardous or flammable materials used during construction of the Project would consist primarily of vehicle fuel and oil for construction equipment. A release or spill of these materials during construction could create a hazard to the school through toxic emissions or increased risk of fire ignition.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-3. These mitigation measures are identified as HAZ-1a, HAZ-1b, and HAZ-1c, and are included above under Impact HAZ-1.

Rationale for Finding. Implementation of Mitigation Measures HAZ-1a, HAZ-1b, and HAZ-1c would ensure workers are properly trained in appropriate work practices, construction waste is disposed of properly, and emergency spill supplies and equipment are readily available during construction of the Project. Together these measures would reduce impacts to Banning High School from hazardous materials to a less-than-significant level.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to hazards and hazardous materials.

Impact HAZ-7: The project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

As discussed in Section D.7.3.3 of the original Draft EIR, the proposed subtransmission line would cross several roadways, including: State Route 60 (SR 60), SR 79, San Timoteo Canyon Road, South Highland Springs Avenue, and several local roads. Construction activities associated with stringing the power line over these roads would result in temporary (approximately 10-minute) road closures. The temporary closures may impede traffic flow for short durations.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-7. This measure, identified as T-3, is included below.

T-3 Ensure Emergency Response Access. SCE and its construction contractor shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. Police departments, fire departments, ambulance services, and paramedic services shall be notified in advance by SCE of the proposed locations, nature, timing, and duration of any construction activities and shall be advised of any access restrictions that could impact their effectiveness. At locations where access to nearby property is blocked, provision shall be ready at all times to accommodate emergency vehicles, such as plating over excavations, short detours, and alternate routes in conjunction with local agencies. Traffic Control Plans (required under Mitigation Measure T-1c) shall include details regarding emergency services coordination and procedures, and copies shall be provided to all relevant service providers. Documentation of coordination with service providers shall be provided to the CPUC prior to the start of construction.

Rationale for Finding. Implementation of Mitigation Measure T-3 would ensure that movement of emergency vehicles would not be restricted during constructions, and that appropriate detours are available in the event of brief road closures. This measure would reduce impacts to emergency response plans or emergency evacuation plans to a less-than-significant level.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to hazards.

Impact HAZ-8: The project would expose people or structures to a significant risk of loss, injury or death involving wildland fires

As discussed in Section D.7.3.3 of the original Draft EIR, a notable portion of the Project lies within the high fire probability zone. Welding during construction could potentially result in the combustion of vegetation located close to the welding site. The use of internal combustion motors, lighted matches, cigarettes, cigars, or other burning objects is a fire hazard, especially within the vicinity of combustible material. During operation of the Project, power lines may pose a fire hazard if a conducting object, such as a tree limb, comes in close proximity to a line or if a live-phase conductor falls to the ground. Conductors can be fire hazards if they fall to the ground and create an electrical arc that ignites combustible material. The use of internal combustion engines (e.g., automobiles, chain saws, string trimmers) for maintenance activities also poses a potential fire hazard. Impacts resulting from the potential ignition of fires would be significant.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-8. These mitigation measures are identified as HAZ-8a, HAZ-8b, HAZ-8c, and HAZ-8d and are included below.

HAZ-8a Prepare and Implement Fire Management Plan. SCE shall develop and implement a comprehensive Fire Management Plan to reduce the risk of igniting a fire during construction and operation as well as controlling the spread of a fire should one occur. The plan shall include, but not be limited to:

- Ensuring that reasonable safeguards and BMPs have been implemented and all supervision, labor, tools, equipment, and material necessary to prevent starting any fire, control spread of fires if started, and provide assistance for extinguishing fires started as a result of transmission line construction activities are provided.
- Using every reasonable precaution against starting fires where the work is performed, in whole or in part, in an area covered with flammable dry grass, brush, and/or trees.
- Providing temporary safeguards, walks, rails, guards, construction fences, and such, as required by any ordinances, as directed by the Construction Representative, or as necessary to protect workers, SCE employees, and the public.
- Providing portable fire fighting equipment, shovels, axes, and other necessary fire fighting equipment at all sites where work is in progress, and with all crews in transit.
- Prohibiting smoking on the jobsite, and if necessary assigning a Fire Patrolperson whose responsibility would be solely to monitor the contractor's fire-prevention activities.

HAZ-8b County Fire Department Review of Construction Methods. SCE shall coordinate with the Riverside and San Bernardino County Fire Departments to review the specific construction methods and equipment, and to identify any additional requirements that will minimize the potential for wildfires, such as the following:

- Any motor, engine, welding equipment, cutting torch, grinding device or equipment from which a spark, fire, or flame may originate shall not be used without first (a) clearing away all flammable material for a distance of 10 feet, and (b) having on hand a round-point shovel with an overall length of not less than 46 inches and a fire extinguisher or water-filled backpack pump fully equipped and ready to use. This does not apply to power saws and other portable tools powered by a gasoline-fueled internal combustion engine.
- Any portable gasoline-powered tool (chainsaws, etc.) shall not be used within 25 feet of any flammable materials without providing one round-point shovel with an overall length of not less than 46 inches or a fire extinguisher having a minimum rating of 2-BC. The fire tools must be unobstructed and within 25 feet of the tool operation at all times. Motor vehicles shall not be parked or operated outside of cleared work areas except for the specific purpose of clearing vegetation.

HAZ-8c Practice Safe Welding Procedures. SCE shall select a welding site that is free of native combustible material and/or clear the site of such material to minimize the fire hazard. All welding on supporting structures shall be performed during fabrication of the poles at the fabricator's yard.

HAZ-8d Fire Preventive Construction Equipment Requirements. Construction equipment shall meet the following requirements:

- The exhausts of all equipment powered by gasoline, diesel, or other hydrocarbon fuel shall be equipped with effective spark arrestors;
- The spark arrestor shall be designed to prevent the escape from the exhaust of carbon or other flammable particles over 0.0232 inches. Motor trucks, truck tractors, buses, and passenger vehicles (except motorcycles) shall not be subject to this provision if their exhaust systems are equipped with mufflers; and
- All welding rigs shall be equipped with a minimum of one 20-pound or two 10-pound fire extinguishers, and a minimum of five gallons of water in a fire-fighting apparatus.

Rationale for Finding. Implementation of Mitigation Measures HAZ-8a, HAZ-8b, HAZ-8c, and HAZ-8d would ensure implementation of a Fire Management Plan to reduce the risk of igniting a fire during construction and operation and to reduce the spread of a fire if one should occur. In addition, the Riverside and San Bernardino County Fire Departments will review construction methods and equipment and suggest further methods for reducing potential for fire, safe welding practices will be followed, and construction equipment will meet requirements to reduce the chance of igniting a fire. Together these measures would reduce impacts from wildland fires to a less-than-significant level.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to hazards.

Impact HAZ-10: Induced Currents and Shock Hazards in Joint Use Corridors

As discussed in section D.7.8.2 of the original Draft EIR, induced currents and voltages on conducting objects near the subtransmission lines represent a potential significant impact that can be mitigated. These impacts do not pose a threat in the environment if the conducting objects are properly grounded.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HAZ-10. This mitigation measure, identified as HAZ-10, is included below.

HAZ-10 Prevent Induced Currents. As part of the siting and construction process for the Proposed Project, SCE shall identify objects (such as fences, conductors, and pipelines) that have the potential for induced voltages and work with the affected parties to determine proper grounding procedures (CPUC G095 and the NESC do not have specific requirements for grounding). SCE shall install all necessary grounding measures prior to energizing the line. Thirty days prior to energizing the line, SCE shall notify in writing, subject to the review and approval of the CPUC, all property owners within and adjacent to the Partial Underground Alternative ROW of the date the line is to be energized. The written notice shall provide a contact person and telephone number for answering questions regarding the line and guidelines on what activities should be limited or restricted within the ROW. SCE shall respond to and document all complaints received and the responsive action taken. These records shall be made available to the CPUC for review upon request. All unresolved disputes shall be deferred by SCE to the CPUC for resolution.

The written notice shall describe the nature and operation of the line, and the Applicant's responsibilities with respect to grounding all conducting objects. In addition, the notice shall describe the property owner's responsibilities with respect to notification for any new objects which may require grounding and guidelines for maintaining the safety of the ROW.

Rationale for Finding. Mitigation Measure HAZ-10 requires SCE to implement procedures to identify and properly ground objects near the Project which will prevent shock hazards to workers and the general public in the vicinity of the Project.

Reference. Original Draft EIR Section D.7 (Hazards and Hazardous Materials) of the EIR provides a complete assessment of the Project impacts related to electric power field issues.

Cumulative Hazards and Hazardous Materials Impacts: Cumulatively create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (HAZ-1); reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (HAZ-2); emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (HAZ-3); would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (HAZ-7); or transmission line operation causes induced currents and shock hazards in joint use corridors (HAZ-10).

As discussed in Section F.1.5.6 (Cumulative Impact Analysis – Hazards and Hazardous Materials) of the original Draft EIR, there is the possibility that a variety of projects will occur at the same time as Project construction. Most of the projects identified in Table F-2 (Cumulative Project List), which occur within 0.25 mile of the Project route, would also involve the use of hazardous materials and would have the potential to result in similar impacts as the Project. Furthermore, a number of these projects would occur within 0.25 mile of the Project and existing school facilities. The project would result in cumulatively considerable contributions to significant cumulative impacts HAZ-1, HAZ-2, HAZ-3, and HAZ-7. However, the Project includes BMPs and Mitigation Measures HAZ-1a, HAZ-1b, and HAZ-1c to reduce the potential for an accidental release of hazardous materials to occur and would include procedures for cleaning up hazardous materials in the unlikely event of a release. In addition, Mitigation Measure T-3 would ensure the Project maintain emergency response access throughout construction.

As discussed in the Recirculated Final EIR (Section 4.2, Revisions to the Original Draft EIR), a cumulative impact will occur if past or reasonably foreseeable projects will result in placement of objects with the potential for induced voltages within proximity of the proposed ROW. However, Mitigation Measure HAZ-10 will require grounding of nearby objects that have the potential for induced voltages.

Therefore, the Project's contribution to this potential cumulative impact would be less than significant after mitigation.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate the project's contribution to cumulatively significant effects on the environment for impacts HAZ-1, HAZ-2, HAZ-3, HAZ-7, and HAZ-10. Specifically, Mitigation Measures HAZ-1a, HAZ-1b, HAZ-1c, HAZ-10 (listed above) and T-3 (listed below) would reduce the Project's contribution to cumulative impacts HAZ-1, HAZ-2, HAZ-3, HAZ-7, and HAZ-10 to less than cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Hazards and Hazardous Materials impacts from construction of these projects could result in an increase to adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could further exacerbate the significant Project-related Hazards and Hazardous Materials impacts. Mitigation Measures HAZ-1a, HAZ-1b, HAZ-1c, and HAZ-10 as listed above and T-3, as listed below, will ensure that the Project would result in less-than-significant cumulative impacts for impacts HAZ-1 through HAZ-7 and HAZ-10 to receptors within the geographic scope area.

Reference. Section F.1.5.6 (Cumulative Impact Analysis – Hazards and Hazardous Materials) of the original Draft EIR (HAZ-1 through HAZ-7) and Section 4.2 (Revisions to the original Draft EIR) of the Recirculated Final EIR (HAZ-10) provides a complete assessment of the cumulative impacts to Hazards and Hazardous Materials. Section D.6 (Hazards and Hazardous Materials) of the original Draft EIR provides a detailed description of the effects of the Project on Hazards and Hazardous Materials.

IV.2.6 Hydrology and Water Quality

As discussed in Section D.8 (Hydrology and Water Resources) of the original Draft EIR, the hydrologic and water resources analysis prepared for the Project was based on data collected from FEMA, U.S. Geologic Survey, and State Water Resources Control Board, as well as from field visits to the Project route, review of aerial photographs, and review of topographic maps. Surface water crossings were identified using aerial photographs and available topographic maps. Water crossings identified are those that are readily identifiable by these means.

Impact HYD-1: Soil erosion and sedimentation caused by construction activities would degrade water quality

As discussed in Section D.8.3.3 of the original Draft EIR, construction activities, including grading and excavation, are expected to cause slope instability and erosion. Construction activities along the length of the proposed route would take place on a variety of gradients, from level ground to a range of slopes. Approximately 40 percent of the soils along the proposed route would have moderate erosion potential. If slope stability and erosion were to occur in connection with Project-related construction activities, sediment deposition and subsequent elevated turbidity could cause a decrease in water quality of waterways in the area of the Project.

Improvement of the substation access road could cause adverse impacts to water quality in San Timoteo Creek by accelerating soil erosion rates and sedimentation in the creek and downstream waterways. The existing road is less than five feet from the creek bank in some locations. Uncontrolled runoff during road construction could accelerate and increase sedimentation in the creek. The net effects of road improvement could include an increase in turbidity within the creek, an increase in sedimentation due to erosion of soils during construction of the road, and a corresponding reduction of the creek's carrying capacity due to sedimentation. Also, construction of the road in close proximity to the creek could accelerate erosion of already unstable creek banks. APMs HYDRO-1, HYDRO-2a, HYDRO-2c,

HYDRO-7, GEO-1 and GEO-2 have been incorporated into the Project to reduce impacts to hydrology and water quality. A complete description of APMs applicable to Hydrology and Water Quality is located in EIR Table D.8-4.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HYD-1. These mitigation measures are identified as HYD-1a, HYD-1b, HYD-1c, and HYD-1d (included below); and GEO-1 and GEO-2 (included above in Section IV.2.4, Geology and Soils).

HYD-1a Implementation of Erosion and Sediment BMPs. The following BMPs shall be implemented in order to minimize potential hydrologic and water quality impacts of erosion and sedimentation created through Project construction:

- Mechanical and vegetative measures shall be implemented to provide surface soil stability where necessary. Mechanical measures may include but are not limited to: wattles, erosion nets, terraces, side drains, blankets, mats, riprapping, mulch, tackifiers, pavement, soil seals, and windrowing construction slash at the toe of fill slopes. Vegetative measures shall be used to supplement mechanical measures, as appropriate.
- Road slope stabilization practices shall be implemented prior to the first winter rains. These practices shall include: verification of the correct slope steepness as dependent upon the dominant soil type/s present, implementation of methods to handle surface and subsurface runoff, and finalization of road surface compaction or application of appropriate surfacing material.
- Any temporary roadways which are built or used for the purpose of transporting construction equipment and materials to construction sites shall be situated to prevent undercutting of the designated final cut slope, avoid deposition of materials outside the designated roadway limits, and accommodate drainage with temporary culverts as necessary.
- Embankment methods shall be implemented to ensure adequate strength of the roadway and shoulder and to minimize potential failure of road embankments and fill areas. Acceptable stabilization methods include: sidecasting and end dumping, layer placement (roller compaction), controlled compaction, minimization of fill volumes, or strengthening of fills using retaining walls, confinement systems, plantings, or a combination of techniques. The appropriate stabilization effort shall be determined by the supervising project or crew leader prior to the onset of construction, based on site-specific conditions.
- Strictly control vehicular traffic to only that which is necessary.
- Restore temporary construction areas (e.g., temporary roads, pulling and splicing stations) to a near-natural condition and ensure that the sites are re-vegetated and stabilized, unless operation and maintenance of the Project would require the areas to remain clear.
- Establish the use of concrete washout stations to capture and contain concrete washout material and wastewater to avoid direct release of washout to surface water.
- Erosion control measures shall be completed prior to the first anticipated rains at all construction sites. An Erosion Control Plan shall be prepared as part of the Project SWPPP.

HYD-1b Timing of Construction Activities. Construction activities, particularly regarding roadway installations and improvements, should occur during the dry season (April to October) or when precipitation events are not expected.

HYD-1c Dispersion of Subsurface Drainage from Slope Construction Areas. In order to minimize sediment production from the potential failure of slope construction areas, subsurface drainage devices shall be implemented where necessary, as determined during final siting and engineering of transmission towers. Where it is determined necessary due to site-specific conditions such as slope severity, soil condition, precipitation levels, and inherent instability, subsurface drainage

will be utilized to avoid moisture saturation and potential subsequent slope failure. Subsurface dispersion methods would include underdrains or subdrains such as pipes, horizontal drains, or chimney drains.

HYD-1d Control of Side-Cast Material, Right-of-Way Debris, and Roadway Debris. Side-cast material includes any loose, unconsolidated materials that must be re-located to facilitate construction activities. This may include rocks and boulders as well as organic materials. Waste areas must be located within designated work areas and stabilized to prevent wind and water erosion. During road construction and maintenance, potential sidecast and other waste material will be utilized on the road surface. Any unused material shall be removed to designated disposal sites. Waste areas shall not be left exposed and must be transported to disposal facilities on a regular basis, which will be determined based on site-specific conditions.

Rationale for Finding. Mitigation Measures HYD-1a, HYD-1b, HYD-1c, and HYD-1d require SCE to implement appropriate BMPs to reduce erosion and sedimentation, conduct construction activities during dry weather, utilize subsurface drainage devices, and dispose of side-cast materials in an appropriate manner. Mitigation Measure GEO-1 will ensure that appropriate geotechnical investigations are performed and that appropriate support and protection measures are implemented to maintain slope stability where necessary, and the inclusion of BMPs as identified in Mitigation Measure GEO-2, such as use of soil stabilizers and building access roads at right angles to streambeds and washes, would reduce erosion effects to less than significant. Together these mitigation measures will reduce impacts to water quality to less than significant.

Reference. Section D.8 (Hydrology and Water Quality) of the original Draft EIR provides a complete assessment of the Project impacts related to water quality.

Impact HYD-2: Degradation of surface water or groundwater quality would occur from the accidental release of potentially harmful materials during construction activities

As discussed in Section D.8.3.3 of the original Draft EIR, accidental spills or disposal of potentially harmful materials used during construction could occur during refueling or due to equipment damage. Spilled liquids could wash into and pollute surface waters or groundwater resulting in a degradation of water quality. This impact could occur at pole or tower installation locations, site laydown and preparation areas, substation expansion sites, and other locations where construction activities would occur. Water Quality has the potential to be affected by construction of bore casings which would be installed using horizontal directional drilling which can result in vertical leakage of drilling fluids, also known as “frac-out.” APMs HYDRO-2a through HYDRO-2d, HYDRO-3, HYDRO-4, HYDRO-6, and HYDRO-8 have been incorporated into the Project to reduce impacts to hydrology and water quality. A complete description of APMs applicable to Hydrology and Water Quality is located in original Draft EIR Table D.8-4.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HYD-2 to a less-than-significant level. These mitigation measures are identified as HYD-2a, HYD-2b, HYD-2c, and HYD-2d, and are included below.

HYD-2a Prevent Frac-out. SCE’s HDD contractor shall take the following precautions to prevent frac-out from occurring during drilling activities:

- Ensure that HDD casings are drilled to a depth of at least eight (8) feet below the bottom of San Timoteo Creek.
- Ensure HDD machinery arrives onsite in clean condition and is free of fluid leaks.

- Wash, refuel, and service machinery and store fuel and other materials for the machinery at least 50 feet away from San Timoteo Creek to prevent any hazardous substances from entering the water.
- Keep emergency spill kits on site in case of fluid leaks or spills from machinery.
- Restore banks to original condition if any disturbance occurs.
- Ensure drilling mud, sediment-laden water, and any other deleterious substances are contained above the high water mark and do not enter San Timoteo Creek.
- Dispose of excess drilling mud, cuttings, and other waste materials at an adequately sized disposal facility located at least 50 feet away from San Timoteo Creek to prevent it from entering the watercourse.
- Monitor San Timoteo Creek to observe signs of surface migration (frac-out) of drilling mud during all phases of construction.

HYD-2b Implement HDD BMPs. SCE's HDD contractor shall implement BMPs during HDD activities to prevent water quality degradation. These measures shall include, but not be limited to:

- Perform all HDD activities outside of the rainy season (November to March). HDD activities shall be scheduled to occur only between the months of April and October.
- A re-circulation system for drilling surface fluid returns shall be employed to minimize the amount of drilling fluid used. Residual materials separated from the drilling fluid shall be disposed of in accordance with applicable regulations.
- All drilling fluid and fluid additives shall be disclosed, and Material Safety Data Sheets (MSDS) shall be maintained onsite during drilling.
- Excess drilling fluid shall be confined in a containment pit at entry and exit locations until recycled or removed from the site.
- Precautions shall be taken to ensure that drilling fluid does not enter roadways, streams, or any other drainage system or body of water.
- Unintended surfacing of drilling fluid shall be contained at the point of discharge and recycled or removed from the site.
- Drilling fluids that are not recycled and reused shall be removed from the site and disposed of at an approved disposal facility in compliance with all environmental regulations, right-of-ways and workspace agreements, and permit requirements.
- Drilling fluids shall be completely removed from the construction site prior to back filling the open conduit pits.
- Collection, transportation, and disposal of drilling fluids shall be conducted in an environmentally safe method and comply with local ordinances and government conditions. SCE and its contractor shall ensure that all drilling materials and fluids are disposed properly.

HYD-2c Prepare and Implement Frac-out Response Plan. Prior to construction SCE shall prepare a Frac-out Response Plan. The plan shall identify detailed, site-specific procedures to monitor, contain, and clean up a potential frac-out, to avoid introduction of drilling fluids into San Timoteo Creek. Procedures shall include measures to stop work, contain the drilling mud and prevent its further migration into the watercourse, notify all applicable authorities, and clean up and dispose of the drilling mud. The plan shall include, but not be limited to:

- Ensuring all material and equipment needed to contain and clean up drilling mud releases is kept on-site and readily accessible in the event of a frac-out.
- Ensuring clean-up measures do not result in greater damage to the banks and watercourse than from leaving the drilling mud in place.

- Developing a contingency crossing plan including measures to either locate a more appropriate location to re-drill or to isolate the watercourse to complete the crossing at the current location.

HYD-2d Develop and Implement a Groundwater Remediation Plan. In the event that groundwater resources are encountered, SCE shall immediately halt the ground disturbing activities and conduct appropriate water testing in compliance with State and federal regulations. If the water is determined to be contaminated, SCE shall develop and implement a site-specific remediation plan to prevent contamination of surrounding groundwater. If dewatering is necessary, SCE shall comply with state and federal regulations regarding discharge of groundwater to adjacent surface water bodies.

Rationale for Finding. Implementation of Mitigation Measures HYD-2a, HYD-2b, HYD-2c, and HYD-2d minimize the risk of frac-out and provide a plan to mitigate frac-out should it occur, ensure that HDD BMPs are followed, and provide for a Groundwater Remediation Plan in the event that groundwater is encountered during construction. Together these mitigation measures will reduce impacts related to accidental release of harmful substances during construction to less than significant.

Reference. Section D.8 (Hydrology and Water Quality) of the original Draft EIR provides a complete assessment of the Project impacts related to water quality. See also original Final EIR response to comment E3-28.

Impact HYD-4: Disturbance of existing groundwater resources

As discussed in Section D.8.3.3 of the original Draft EIR, ground disturbing activities at the El Casco Substation site have the potential to encounter groundwater. If groundwater is encountered, construction activities would have the potential to degrade water quality through introduction of contaminants such as soils, drilling fluids, and chemicals used during construction. APMs HYDRO-1, HYDRO-2a, HYDRO-2c, HYDRO-2d, HYDRO-4, and HYDRO-8 have been incorporated into the Project to reduce impacts to hydrology and water quality. A complete description of APMs applicable to Hydrology and Water Quality is located in original Draft EIR Table D.8-4. In order to ensure the potential impacts to groundwater are less than significant, Mitigation Measure HYD-2d has also been incorporated to reduce impacts associated with Impact HYD-4.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HYD-4 to a less-than-significant level. This mitigation measure, identified as HYD-2d, is included above under Impact HYD-2.

Rationale for Finding. Preparation and implementation of the Groundwater Remediation Plan required by Mitigation Measure HYD-2d formalizes the procedures necessary to limit groundwater contamination in the event that groundwater is encountered during construction, thereby protecting the health of workers and the general public and reducing impacts from disturbance of existing groundwater resources to less than significant.

Reference. Section D.8 (Hydrology and Water Quality) of the original Draft EIR provides a complete assessment of the Project impacts related to water quality.

Impact HYD-7: Transmission towers or other above-ground project features located in a floodplain or watercourse could result in flooding, flood diversions, or erosion

As discussed in Section D.8.3.3 of the original Draft EIR, encroachment of a project structure into a water flow path could result in erosion damage to the encroaching structure. Portions of the subtransmission line route are in locations that are susceptible to flooding when heavy rains occur within steep mountainous

areas. Transmission towers placed near drainages may be susceptible to flooding during heavy rains which could cause erosion-related damage to Project structures.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact HYD-7 to a less-than-significant level. This mitigation measure, identified as HYD-7, is included below.

HYD-7 Aboveground Structures Shall be Protected Against Flood and Erosion Damage.

Aboveground Project features such as transmission line towers and substation facilities shall be designed and engineered to withstand any physical and mechanical stresses that may result from location, such as potential flooding or erosion of the surrounding area. Site-specific measures may include tower anchoring, installation of slope protection, or raising foundation levels. All Project-related facilities shall be placed outside the current and reasonably expected future flow path of watercourses. No Project-related facilities shall be positioned within a known watercourse.

Rationale for Finding. Implementation of Mitigation Measure HYD-7 will ensure that any floodplain encroachment by project structures will be designed in such manner that structures and adjacent areas are protected from erosion and flooding.

Reference. Section D.8 (Hydrology and Water Quality) of the original Draft EIR provides a complete assessment of the Project impacts related to hydrology.

IV.2.7 Public Services and Utilities

To gather information regarding public services and utilities that could be impacted by Project activities, a list of service providers and utilities was compiled for each affected jurisdiction. Service providers include fire protection, police protection, hospitals, and schools. Utilities include natural gas & electricity providers, water providers, wastewater processors, telecommunications providers, and landfills.

Impact U-1: Utility system disruptions

As discussed in Section D.10.3.3 of the original Draft EIR, co-located utilities such as natural gas or water pipelines may be within the utility easement underneath the existing 115 kV subtransmission line in the Project ROW. The El Casco System Project ROW between milepost 10.0 and 11.0 contains a 100-foot utility corridor that runs east-west through the Sun Lakes community on the east side of Highland Springs Avenue. SCE retains an easement along the northern 50 feet of the corridor, while the Southern California Gas Company retains the easement along the southern 50 feet of the corridor. Located within the Southern California Gas Company corridor is a high-pressure natural gas line. Natural gas and water pipelines are likely located within public streets and service could potentially be temporarily disrupted during planned construction of the underground fiber optic cable installation. Therefore, there could be potential for service interruptions of these utilities during construction of the Project. While any disruption in service would be expected to be temporary in nature, these disruptions would hinder activities in the surrounding area.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact U-1 to a less-than-significant level. This mitigation measure, identified as U-1a, is included below.

U-1a Notification of Utility Service Interruption. Prior to construction in which a utility service interruption is known to be unavoidable, SCE shall notify members of the public affected by the planned outage by mail of the impending interruption, and shall post flyers informing the public of the service interruption in neighborhoods affected by the planned outage. Copies of notices and dates of public notification shall be provided to the CPUC.

Rationale for Finding. Implementation of Mitigation Measure U-1a will ensure that any activities for which a service interruption is known and unavoidable will be noticed to members of the public that would be affected by the interruption.

Reference. Section D.10 (Public Services and Utilities) of the original Draft EIR provides a complete assessment of the Project impacts related to public services and utilities.

Cumulative Public Services and Utilities Impacts:

Cumulatively disrupt the existing utility systems or cause a collocation accident through the crossing or shared location with another utility line (U-1)

As discussed in Section 4.2 (Revisions to the Original Draft EIR) of the Recirculated Final EIR, during construction, should construction activities from projects identified in Table F-2 (Cumulative Project List) of the original Draft EIR occur at the same time as Project construction, cumulative impacts could occur to utility lines as a result of combined construction areas resulting in utility service disruption.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate the Project's contribution to significant cumulative effects on the environment from Cumulative Impact U-1 to less than cumulatively considerable. Specifically, Mitigation Measure U-1a, Notification of Utility Service Interruption (as listed above), will reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. As temporary disruptions in utility service could occur during construction of the Project and identified cumulative projects, potential cumulative utility disruptions could occur. This would result in a cumulatively considerable contribution to a significant cumulative impact without mitigation. Mitigation Measure U-1a, as listed above, will ensure that the Project would ensure the Project's contribution to utility systems disruption and collocation accidents would be less than cumulatively considerable.

Reference. Section 4.2 (Revisions to the original Draft EIR) of the Recirculated Final EIR provides a complete assessment of the Project's cumulative impacts related to utility service disruptions.

Cumulatively require the need for new or physically altered public service facilities in order to maintain acceptable service ratios, response times, or other performance objectives (U-2)

As discussed in Section F.1.5.9 (Cumulative Impact Analysis – Public Services and Utilities) of the original Draft EIR, if construction activities from projects identified in Table F-2 (Cumulative Project List) of the original Draft EIR occur at the same time as Project construction, cumulative impacts could occur to public services as a result of combined construction areas limiting emergency service access.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate the Project's contribution to significant cumulative effects on the environment from Cumulative Impact U-2 to less than cumulatively considerable. Specifically, Mitigation Measure T-3, Ensure Emergency Response Access (as listed below) will reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Public Services and Utilities impacts from construction of these projects could result in an increase to adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could

further exacerbate the significant Project-related Public Services and Utilities impacts. Mitigation Measure T-3, as listed below, will ensure that the Project would result in less-than-significant cumulative impacts for Impact U-2 to receptors within the geographic scope area.

Reference. Section F.1.5.9 (Cumulative Impact Analysis – Public Services and Utilities) of the original Draft EIR provides a complete assessment of the Project’s cumulative impacts related to public services and utilities.

IV.2.8 Transportation and Traffic

To gather information regarding the traffic and transportation effects of the Project, applicable traffic regulations were collected for each affected jurisdiction, including those identified in jurisdictional General Plans and those outlined by the Department of Transportation. In addition, data for the transportation network were collected and analyzed from the following sources: highway maps; route alignment maps obtained from SCE; and other maps from various reports and websites from the affected State and local agencies. Traffic volume data were obtained from agency websites and reports. Lane information was obtained from aerial photographs and field reconnaissance. A complete list of these sources is available in Section D.11, Transportation and Traffic, of the original Draft EIR.

For the purposes of the analysis in the EIR and based on CEQA requirements, subtransmission line project impacts to the ground transportation system (roads and railroads) during construction could occur during installation of towers and the stringing of conductors, as these activities would interface with the public roadway system at numerous locations along the Project route. In addition, aviation impacts could occur should a project structure, crane, or wires be positioned such that it could adversely affect aviation activities.

Impact T-1: Temporary road and lane closures

As discussed in Section D.11.3.3 of the original Draft EIR, stringing activities associated with the proposed 115 kV subtransmission line would cross a number of local roadways and a few arterial roadways. While any closures of roadways during conductor and fiber optic cable stringing activities would be temporary, these impacts could still be significant. Specifically, roadways located within the Cities of Calimesa, Banning, and Beaumont, as well as unincorporated Riverside County, will be impacted. In addition, delivery of large and heavy pieces of material (e.g., lattice steel tower and tubular steel pole parts) via truck may require temporary street closures and would likely require issuance of a permit from the agency regulating the affected roadway. Temporary closures of this nature would likely occur for only up to a few minutes at a time. As discussed in Section B (Project Description), a traffic control service would be used for oversized material delivery. However, such closures could increase traffic levels and constrain circulation in the area, resulting in significant impacts.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-1 to a less-than-significant level. These mitigation measures, identified as T-1a, T-1b, T-1c, and T-1d, are included below.

- T-1a Roadway Capacity Maintenance.** SCE and its construction contractor shall maintain the maximum possible amount of travel lane capacity on roads during non-construction periods and shall provide traffic control (using flags) at all construction sites.
- T-1b Work Zone Minimization.** During construction, SCE and its construction contractor shall limit the work zone to a width that, at a minimum, maintains alternate one-way traffic flow past the construction zone. Alternatively, SCE and its construction contractor shall post detour signs on alternate access streets, where available, in the event that complete temporary street closures are

required. Detour plans shall be submitted to the cities and Caltrans as part of the permit requirements.

T-1c Prepare Transportation Management Plans. Prior to the start of construction, SCE shall submit Traffic Management Plans (TMPs) to all agencies with jurisdiction over public roads that would be affected by overhead and underground construction activities. TMPs are required as part of the required traffic encroachment permits. TMPs shall define the locations of all roads that would need to be temporarily closed due to construction activities, including aerial hauling by helicopter, hauling of oversized loads by truck, and conductor stringing activities. Input and approval from the responsible public agencies shall be obtained; copies of approval letters from each jurisdiction must be provided to the CPUC prior to the start of construction within that jurisdiction. The TMPs shall define the use of flag persons, warning signs, lights, barricades, cones, etc. according to standard guidelines outlined in the Caltrans Traffic Manual, the Standard Specifications for Public Works Construction, and the *Work Area Traffic Control Handbook* (WATCH). Documentation of the approval of these plans and issuance of encroachment permits shall be provided to the CPUC prior to the start of construction activities that require temporary closure of a public roadway.

T-1d Restrict Lane Closures. SCE shall restrict all necessary lane closures or obstructions on major roadways associated with overhead or underground construction activities to off-peak periods in urbanized areas, or as directed in writing by the affected public agency in the encroachment permit, to mitigate traffic congestion and delays. Lane closures in urbanized areas must not occur between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., or as directed in writing by the affected public agency in the encroachment permit.

Rationale for Finding. Implementation of Mitigation Measures T-1a through T-1d will ensure that the obstruction of roadways is minimized to the extent practicable and that Transportation Management Plans are prepared and distributed to local jurisdictions prior to the start of construction. Together these measures will ensure that impacts to traffic and transportation are less-than-significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-3: Construction interference with emergency response

As discussed in Section D.11.3.3 of the original Draft EIR, temporary lane closures during Project construction would potentially interfere with emergency response by ambulance, fire, paramedic, and police vehicles. The loss of a lane and the resulting increase in congestion could lengthen the response time required for emergency vehicles passing through the construction zone. Moreover, there is a possibility that emergency services may be needed at a location where access is temporarily blocked by the construction zone.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-3 to a less-than-significant level. This includes Mitigation Measure T-3, which is provided above in Section IV.2.5 for Impact HAZ-7.

Rationale for Finding. Implementation of Mitigation Measure T-3 will ensure that SCE coordinates in advance with emergency service providers and avoids restricting emergency response access to and through Project construction areas, thereby reducing impacts to emergency access to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-4: Loss of business and residential access

As discussed in Section D.11.3.3 of the original Draft EIR, temporary lane closures during Project construction would potentially result in short-term impacts to business and residential access immediately adjacent to the construction ROW.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-4 to a less-than-significant level. This mitigation measure, identified as T-4, is included below.

T-4 Public Notification. All property owners and residents on streets where construction occurs shall be notified prior to the start of construction. Advance public notification shall include postings of duration of construction disruption and appropriate signs detailing alternate access to impacted properties and/or clearly marked detours for vehicular traffic.

Rationale for Finding. Implementation of Mitigation Measure T-4 will ensure that SCE provides advance notification of construction to adjacent property owners and details alternate access and routes. This notification will allow both business owners and residents to plan for any temporary change of access to properties, thereby reducing impacts to business and residential access to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-5: Loss of parking

As discussed in Section D.11.3.3 of the original Draft EIR, parking for workers' vehicles would be provided at the staging sites on SCE property. Therefore, construction workers would have no impact on local public parking. However, temporary lane closures during Project construction would potentially result in short-term elimination of parking spaces within roadways immediately adjacent to the construction ROW.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-5 to a less-than-significant level. This mitigation measure, identified as T-5, is included below.

T-5 Parking Impact Provisions. As part of the Traffic Control Plans (required under Mitigation Measure T-1c), SCE shall develop for residential and business areas a notification process for temporary parking impacts and appropriate sign postings. SCE shall minimize the length of any temporary parking restrictions, develop appropriate sign postings, and specify the process for communicating with affected residents.

Rationale for Finding. Implementation of Mitigation Measure T-5 will ensure that SCE provides advance notification of temporary parking impacts and minimizes the length of parking restrictions. This notification will allow both business owners and residents to plan for any temporary change to parking locations for properties, thereby reducing impacts to business and residential access to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-6: Disruption of public transit

As discussed in Section D.11.3.3 of the original Draft EIR, temporary lane closures during Project construction would potentially result in short-term disruption of public and school bus routes.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-6 to a less-than-significant level. This mitigation measure, identified as T-6, is included below.

T-6 Coordination with School Bus Routes and Transit Services. As part of the Traffic Control Plans (required under Mitigation Measure T-1c), SCE shall consult with all affected School Districts at least one month prior to construction to coordinate construction activities adjacent to school bus stops. If necessary, school bus stops shall be temporarily relocated or buses shall be temporarily detoured until construction in the vicinity is complete. SCE shall also consult with the Riverside Transit Agency (RTA) at least one month prior to construction to reduce potential interruption of transit services.

Rationale for Finding. Implementation of Mitigation Measure T-6 will ensure that SCE coordinate with all affected school districts and the Riverside Transit Agency to reduce impacts to bus routes and stops, thereby reducing impacts to public transit to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-7: Disruption of rail service

As discussed in Section D.11.3.3 of the original Draft EIR, the Union Pacific Railroad utilizes a railroad line for multiple freight train operations on a daily basis that is located adjacent to San Timoteo Canyon Road at the proposed El Casco Substation site. At the northeast corner of the proposed substation site, duct banks would be installed underground for approximately 300 feet, beneath both San Timoteo Creek and the adjacent Union Pacific Railroad tracks, and then terminate in separate vaults on the south side of San Timoteo Canyon Road. The installation of the bore casings would be accomplished using horizontal directional drilling (HDD) techniques and would be designed so that the top of the casings would be approximately eight feet below the flow line of the creek. The depth of HDD under the Union Pacific Railroad ROW is unknown at this time.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-7 to a less-than-significant level. This mitigation measure, identified as T-7, is included below.

T-7 Coordination with Union Pacific Railroad. As part of the Traffic Control Plans (required under Mitigation Measure T-1c), SCE shall consult with Union Pacific Railroad at least one month prior to construction to coordinate construction activities adjacent to any Union Pacific Railroad tracks.

Rationale for Finding. Implementation of Mitigation Measure T-7 will ensure that SCE coordinates with Union Pacific Railroad to reduce impacts to Union Pacific Railroad tracks during construction of duct banks at the El Casco Substation.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-8: Construction activities would cause temporary road closures that would impede pedestrian and/or bicycle movements

As discussed in Section D.11.3.3 of the original Draft EIR, temporary lane closures during Project construction would potentially result in short-term disruption of pedestrian and bicycle routes.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-8 to a less-than-significant level. This mitigation measure, identified as T-8, is included below.

T-8 Pedestrian and Bicycle Facility Provisions. Where construction requires temporary closures of sidewalks and other pedestrian/bicycle routes, SCE shall provide temporary access, through detours or safe areas along the construction zone. Any affected pedestrian/bicycle facilities and the alternative facilities or detours provided shall be identified in the Traffic Control Plans (required under Mitigation Measure T-1c). Where construction activity results in bike lane closures, appropriate detours and signs shall be provided. Where trenching disrupts bicycle travel on streets, for the use of plates to cover trenches shall be in accordance with the permit requirements of the local jurisdiction.

Rationale for Finding. Implementation of Mitigation Measure T-8 will ensure that SCE provides temporary access through or around road closures during Project construction, thereby reducing impacts to pedestrian and bicycle facilities to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-9: Construction activities would cause physical damage to road ROWs

As discussed in Section D.11.3.3 of the original Draft EIR, the use of heavy trucks and other equipment used during construction activities for the Project would potentially cause physical damage and/or deterioration of the surface on the roadways that will provide access to the Project alignment.

Finding. The CPUC finds that repairing any damaged roadways or roadway features as a result of construction activities will mitigate significant traffic impacts related to physical roadway damage to the environment from Impact T-9 to a less-than-significant level. This activity is incorporated into the Project as Mitigation Measure T-9 below.

T-9 Repair Damaged Road ROWs. If Project-related activities cause damage to any roads, sidewalks, and/or medians (including irrigation systems for landscaped medians), SCE shall coordinate repairs with the affected public agencies to ensure that any damage is adequately repaired. Roads disturbed by construction activities or construction vehicles shall be properly restored to ensure long-term protection of road surfaces. Care shall be taken to prevent damage to roadside drainage structures. Said measures shall be incorporated into an access agreement/easement with the applicable governing agency prior to construction.

Rationale for Finding. Most construction activities will be localized at the point of construction, however, construction vehicle use could damage existing roadways and roadway facilities, including sidewalks. During construction, CPUC Environmental Monitors will be located on-site and will report any damage requiring repair to SCE. In addition, local jurisdictions and public agencies can report any damage caused by construction-related use to SCE requiring repair. As construction activities are considered short-term and temporary in nature, by implementing the measures outlined in T-9, construction impacts related to physical damage to roadways and facilities will be reduced to a less-than-significant level.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Impact T-10: Construction activities would affect aviation activities

As discussed in Section D.11.3.3 of the original Draft EIR, helicopters may be used at SCE's existing Mill Creek Communications Site within the San Bernardino National Forest (SBNF) for erection of the microwave towers. A helicopter landing zone would not be necessary at the Mill Creek Communications Site, and would occur at an appropriate location near the staging area behind SCE's existing Mill Creek 2 & 3 Hydroelectric Power plant. While carrying the individual tower sections to the Mill Creek Site, the helicopter would be limited to a path directly between the Mill Creek 2 & 3 Hydroelectric Plant and the Mill Creek Communications Site. However, travel from a base location to the hydroelectric plant would not be along a defined flight path.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact T-10 to a less-than-significant level. This measure, identified as T-10, is included below.

T-10 Helicopter Lift Plan. A Helicopter Lift Plan shall be prepared and approved by the FAA prior to all helicopter construction activities. SCE shall provide documentation of FAA approval of the Helicopter Lift Plan to the CPUC prior to the start of any helicopter construction activities.

Rationale for Finding. Implementation of Mitigation Measure T-10 will ensure that SCE prepares and implements a Helicopter Lift Plan to be approved by the FAA prior to the commencement of construction, thereby reducing impacts related to helicopter construction to less than significant.

Reference. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a complete assessment of the Project impacts related to transportation and traffic.

Cumulative Transportation and Traffic Impacts: Cumulatively reduce the number of, or the available width of, one or more travel lanes during the peak traffic periods, resulting in a temporary disruption to traffic flow and/or increased traffic congestion (T-1); restrict the movements of emergency vehicles (police cars, fire trucks, ambulances, and paramedic units) and there would be no reasonable alternative access routes available (T-3); restrict access to or from adjacent land uses and there would be no suitable alternative access (T-4); increase the demand for and/or reduce the supply of parking spaces and there would be no provisions for accommodating the resulting parking deficiencies(T-5); disrupt public transport service and there would be no suitable alternative routes or stops (T-6); disrupt rail service (T-7); impede pedestrian movements or bike trails in the construction area and there would be no suitable alternative pedestrian/bicycle access routes(T-8); increase roadway wear resulting in noticeable deterioration of roadway surface (T-9); or result in safety problems for aviation facilities(T-10).

As discussed in Section F.1.5.10 (Cumulative Impact Analysis – Transportation and Traffic) of the original Draft EIR, continued development of the Riverside and San Bernardino County areas has contributed to congestion on area roadways that would be crossed by the Project route. Therefore, temporary roadway congestion resulting from lane closures associated with construction of the Project could combine with congestion from other construction projects along the subtransmission and fiber optic ROWs and congestion resulting from future development projects listed in Table F-2 of the original Draft EIR to create a temporary cumulative significant impact. However, Mitigation Measures T-1a through T-1d will ensure that significant impacts associated with short-term lane closures during Project construction are reduced to less-than-significant levels. In addition, Mitigation Measure T-3 will ensure that significant impacts to emergency access associated with short-term lane closures during Project construction are reduced to less-than-significant levels. Furthermore, Mitigation Measure T-4 will reduce Project impacts associated with loss of residential or business access, Mitigation Measure T-5 will reduce Project impacts associated with loss of street parking, Mitigation Measure T-6 will reduce Project impacts to public and school bus routes and stops, Mitigation Measure T-7 will reduce Project impacts associated with any temporary disruption to rail service, Mitigation Measure T-8 will reduce Project impacts to

public and school bus routes and stops, and Mitigation Measure T-9 will reduce Project impacts and ensure any damage to area road ROWs caused by construction of the Project would be repaired upon completion of construction activities. At the same time as the Project construction, potential cumulative aviation impacts may occur, and Mitigation Measure T-10 will reduce Project impacts associated with helicopter use during construction. These measures will reduce the Project's cumulative contribution to these impacts to a less-than-significant level.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate the Project's cumulatively considerable contribution to significant cumulative effects on the environment from Cumulative Impacts T-1, T-3, T-4, T-5, T-6, T-7, T-8, T-9 and T-10 to less than cumulatively considerable. Specifically, Mitigation Measures T-1a through T-1d and T-3 through T-10 (as listed above) will reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Transportation and traffic impacts from construction and operation of these projects could result in an increase in impacts to facilities and adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could further exacerbate the significant Project-related transportation and traffic impacts. Mitigation Measures T-1a through T-1d and T-3 through T-10 (as listed above), will reduce the Project's contribution to significant cumulative transportation and traffic impacts to less than considerable.

Reference. Section F.1.5.10 (Cumulative Impact Analysis – Transportation and Traffic) of the Original Draft EIR provides a complete assessment of the cumulative impact on transportation and traffic impacts. Section D.11 (Transportation and Traffic) of the original Draft EIR provides a detailed description of the effects of the Project on transportation and traffic facilities.

IV.2.9 Visual Resources

To assess impacts to Visual Resources the Visual Sensitivity–Visual Change Methodology was used. The study area for the visual resources analysis was defined by the numerous viewpoints from which the Project will be seen. The viewshed is extensive given the relative openness of much of the landscape, the height of the structures, and the availability of viewing opportunities from travel routes, recreational use areas, and nearby residential and commercial areas.

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

As discussed in Section D.12.3 of the original EIR, construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at the substations and staging areas. Construction equipment and activities would be seen by various viewers in close proximity to the substations and staging areas including nearby rural and suburban residents as well as travelers and recreationists 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, are included below.

- 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 substation construction sites and 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 D.12 (Visual Resources) of the original EIR provides a complete assessment of the Project impacts 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 D.12.3 of the original Draft EIR, land scarring from use of staging areas and construction yards, construction of new access and spur roads, and activities adjacent to construction sites and 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 scarring impacts that affect visual resources will be reduced to a less-than-significant level. These measures are identified below.

- 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. The mitigation measures 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, 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 D.12 (Visual Resources) of the original EIR provides a complete assessment of the Project impacts related to visual resources.

Impact V-3: Increased structure contrast, industrial character, view blockage, skylining, and glare when viewed from Key Viewpoint 1 on eastbound San Timoteo Canyon Road

As discussed in Section D.12.3 of the original Draft EIR, the El Casco Substation would be located immediately south of San Timoteo Canyon Road, a Southern Pacific rail line, and a riparian corridor. While many of the low-profile substation components would be screened from view by existing riparian vegetation, some of the taller subtransmission components closest to San Timoteo Canyon Road would be prominently visible, particularly where there are gaps in the intervening riparian vegetation. The new structures would introduce additional industrial character into the landscape and cause additional view blockage of background hills and sky. The structures and conductors would skyline (extend above the horizon line), which would exacerbate structure prominence. As a result, visual contrast would be moderate-to-high and the Project would appear co-dominant with the existing landscape features (primarily the horizontal forms of the background hills and foreground vegetation). View blockage of background sky and hills would be moderate. The overall visual change would be moderate and in the context of the existing landscape's moderate to high visual sensitivity, the resulting visual impact would be significant but mitigable.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact V-3 to a less-than-significant level. Specifically, the CPUC finds that by requiring Mitigation Measures V-3a and V-3b visual impacts will be reduced to a less-than-significant level. These measures are identified below.

- V-3a Reduce Visibility of the El Casco Substation Site.** SCE shall submit to CPUC an El Casco Screening Plan that reduces visibility of the proposed El Casco Substation and connecting

subtransmission line structures when viewed from San Timoteo Canyon Road, the Norton Younglove Reserve, and the new residential development on the north side of the road. Starting from the previously submitted El Casco Substation Preliminary Site Development Plan, SCE shall increase the density of native habitat plants, including but not limited to Coast Live Oak (*Quercus agrifolia*) and Black Willow (*Salix gooddingii*) along the north to east boundaries of the site. Additional understory shrubs shall also be planted to intersect lower sightlines. Also, the existing gaps in the riparian vegetation must be filled with the appropriate riparian plant species to match the maximum heights of the densest riparian vegetation along San Timoteo Canyon Road. SCE shall submit the Plan to CPUC for review and approval at least 90 days prior to installing the landscape screening. If CPUC notifies SCE that revisions to the Plan are needed before the Plan can be approved, SCE shall prepare and submit for review and approval a revised Plan within 30 days of receiving that notification. The plan shall include but not be limited to:

- 11"X17" color simulations of the proposed landscaping at 5 years when viewed from Key Viewpoints 1, 2, and 3.
- Plan view to scale depicting the Project and the location of screening elements.
- A detailed list of any plants to be used; their size and age at planting; the expected time to maturity, and the expected height at five years and at maturity.

SCE shall complete installation of the screening prior to the start of Project operation. SCE shall notify CPUC within seven days after completing installation of the screening, that the screening components are ready for inspection.

V-3b Reduce Operation Night Lighting Impacts. SCE shall design and install all permanent lighting such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the Project facilities, vicinity, and nighttime sky is minimized. SCE shall submit a Lighting Mitigation Plan to the CPUC for review and approval at least 90 days prior to ordering any permanent exterior lighting fixtures or components. SCE shall not order any exterior lighting fixtures or components until the 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; and
- 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. Mitigation Measures V-3a and V-3b will require screening of the El Casco Substation and reduction of operational night lighting. These measures require plan approval prior to construction to ensure that the regulatory agencies agree with the approach to meeting these mitigation measures prior to the start of construction. Implementation of these mitigation measures will effectively reduce the level of impacts associated with the El Casco Substation to a less-than-significant level.

Reference. Section D.12 (Visual Resources) of the original EIR provides a complete assessment of the Project impacts related to visual resources.

Impact V-4: Increased structure contrast, industrial character, view blockage, skylining and glare when viewed from Key Viewpoint 2 in Norton Younglove Reserve

As discussed in Section D.12.3 of the original Draft EIR, El Casco Substation would introduce a highly industrial-appearing facility in a predominantly natural-appearing landscape. The new facility would

appear structurally complex and exhibit considerable industrial character. Also, the connecting subtransmission structures and conductors would skyline (extend above the horizon line), which would exacerbate structure prominence. As a result, visual contrast would be high and the proposed substation would appear co-dominant to dominant compared to the existing landscape features (primarily the horizontal forms of the background hills). View blockage of background hills and sky (connecting subtransmission line towers) would be moderate. The overall visual change would be moderate-to-high and in the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact would be significant but mitigable.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact V-4 to a less-than-significant level. The CPUC finds that by requiring Mitigation Measures V-3a and V-3b visual impacts will be reduced to a less-than-significant level. These measures are identified above under Impact V-3.

Rationale for Finding. Mitigation Measures V-3a and V-3b will require screening of the El Casco Substation and reduction of operational night lighting. These measures require plan approval prior to construction to ensure that the regulatory agencies agree with the approach to meeting these mitigation measures prior to the start of construction. Implementation of these mitigation measures will effectively reduce the level of impacts associated with the substation to a less-than-significant level.

Reference. Section D.12 (Visual Resources) of the original EIR provides a complete assessment of the Project impacts related to visual resources.

Cumulative Visual Resources Impacts: Project construction activities would cause a cumulative visual impact (V-1 and V-2)

As discussed in Section F.1.5.11 (Cumulative Impact Analysis – Visual Resources) of the original Draft EIR, to the extent that the Project during construction would be visible within the same field of view as one or more of the cumulative projects, if also under construction, adverse visual impacts would occur with the visible presence of construction equipment, vehicles, materials, and personnel. However, these visual impacts would be temporary and would not create significant cumulative effects, particularly along the linear components of the project where construction activities are transient. No additional mitigation measures are recommended beyond Measures V-1 and V-2 (as listed above). Therefore, because construction-related visual impacts are short-term and temporary, the Project cumulative contribution would be less-than-significant after mitigation.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate the Project's cumulatively considerable contribution to the significant cumulative effects on the environment from Impact V-1 to a less than cumulatively considerable level. Specifically, Mitigation Measures V-1 and V-2 (as listed above) will reduce the Project's contribution to less than cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Visual impacts from construction of these projects could result in an increase to impacts on facilities and adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could further exacerbate the significant Project-related visual impacts. Mitigation Measures V-1 and V-2 (as listed above) will reduce the Project's contribution to significant cumulative construction related visual impacts to less than cumulatively considerable.

Reference. Section F.1.5.11 (Cumulative Impact Analysis – Visual Resources) of the original EIR provides a complete assessment of the cumulative impact on visual impacts. Section D.11 (Visual Resources) of the original EIR provides a detailed description of the effects of the Project on visual resources.

IV.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 EIR, the Commission has determined that the Project will have significant impacts in the issue areas 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 impacts in the detailed issue area analyses in Section D of the EIR, and the cumulative impacts discussed in Section F (Cumulative Scenario and Impacts) of the EIR, as revised in the original Final EIR (April 2008), the Recirculated Draft EIR (July 2008), and the Recirculated Final EIR (October 2008). 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.

IV.3.1 Air Quality

Impact AQ-1: Construction emissions exceed regional significance criteria

As discussed in Section D.2 (Air Quality) of the original EIR, daily construction emissions based on the current integrated Project construction schedule would be greater than the SCAQMD regional significance criteria for NO_x and PM₁₀.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact AQ-1 to the extent feasible. Specifically, implementation of Mitigation Measures AQ-1a (Fugitive Dust Controls) and AQ-1b (Control Exhaust Emissions) would reduce NO_x and PM construction impacts to air quality in the SCAQMD to the maximum degree feasible but would not eliminate all significant impacts. The Project's NO_x and PM₁₀ emissions, even after implementation of these feasible mitigation measures, would remain above the SCAQMD daily significance threshold values. Therefore, the daily emissions from the Project would temporarily cause significant and unavoidable (Class I) regional impacts. The CPUC finds that specific economic, legal, social, technological, and other considerations make infeasible additional mitigation measures or Project alternatives.²

AQ-1a Fugitive Dust Controls. APMs AQ-1 to AQ-16 (see Table D.2-13) shall be implemented at all construction sites. Other SCAQMD Rule 403 dust control measures, not included in APMs AQ-1 to AQ-16, shall be implemented as appropriate to reduce fugitive dust emissions to the greatest extent feasible. A fugitive dust plan including these measures as well as their methods of implementation and assurance shall be submitted to the CPUC for review and approval at least 60 days before the start of construction. Additionally, a fugitive dust control plan shall be submitted to SCAQMD and grading plans shall be submitted to local jurisdictions as appropriate.

AQ-1b Control Exhaust Emissions. Emissions from offroad and onroad construction equipment shall be minimized to the extent feasible. An exhaust emission reduction plan shall be submitted to the CPUC for review and approval at least 60 days prior to the start of construction. The plan shall document the approach for ensuring carpooling, use of alternatively fueled and low emitting onroad and offroad vehicles, and shall define how and where records of equipment and equipment

² Alternatives are discussed in greater detail in Section V of these CEQA Findings.

tuning and maintenance will be kept for CPUC review during construction. The exhaust emission reduction plan shall include, but not be limited to, the following measures:

- Offroad equipment greater than 50 horsepower shall, to the extent feasible, have the highest available USEPA/CARB Tier engines, or shall be alternatively fueled construction equipment.
- Onroad heavy haul equipment used for material import or waste export trips shall meet California onroad standards and new equipment/engines shall be used/contracted to the extent feasible.
- Construction workers will carpool when possible
- Vehicle idling time will be minimized (e.g., 5-minute maximum). SCE shall ensure that all construction workers are aware of the vehicle idling restriction by including explanation of this requirement in the Worker Training Program.
- Equipment will be properly tuned and maintained.
- All material deliveries and waste haul trips to and from the Project site shall be scheduled to occur outside of peak “rush hour” traffic hours (7:00 to 10:00 a.m. and 4:00 to 7:00 p.m.) to the extent feasible

Rationale for Finding. During construction of the Project within the SCAQMD, construction emissions will create a short-term, but significant, impact by exceeding the daily NO_x and PM₁₀ thresholds within the SCAQMD jurisdiction. While the mitigation measures above will reduce this impact to the extent feasible, it is not feasible to implement any additional mitigation measures. This is because the PM₁₀ emissions estimate already assumes the use of aggressive soil and unpaved road watering dust controls (APMs AQ-1 through AQ-4, AQ-7 through AQ-10, and AQ-12 through AQ-14) and the NO_x emissions currently assume average fleet emissions for offroad and onroad equipment. There are no other feasible mitigation measures or alternatives available to reduce the significant air quality impact to a level that will be less than significant.

Reference. Section D.2 (Air Quality) of the original EIR provides a complete assessment of the air quality impacts of the Project.

Impact AQ-2: Construction emissions exceed localized significance criteria

As discussed in Section D.2.3.3 of the original EIR, selected construction activities are predicted to cause daily construction site emissions that exceed PM₁₀ and PM_{2.5} Localized Significance Thresholds (LSTs). No construction activities are predicted to exceed the NO_x LST thresholds. The construction activities that are predicted to cause emissions greater than the appropriate PM₁₀ and PM_{2.5} LSTs are those that include assumed unpaved access or earthmoving work, and only occur where sensitive receptors are very close to the work areas. For the 115 kV installation, the LST exceedances would only occur where the 115 kV subtransmission route would be accessed by an unpaved access road and where residences are also located within approximately 50 meters of the work area. Due to the predicted LST exceedances, the Project would cause significant and unavoidable (Class I) localized PM₁₀ and PM_{2.5} impacts for nearby sensitive receptors to the Banning Substation, the Zanja Substation, and selected areas of the 115 kV installation including the underground portion.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact AQ-2 to the extent feasible. Specifically, implementation of Mitigation Measures AQ-1a and AQ-1b (discussed above under Impact AQ-1) would reduce impacts to air quality during construction to the maximum degree feasible but would not reduce all significant impacts. The Project’s PM₁₀ and PM_{2.5} emissions, even after implementation of these

feasible mitigation measures, would remain above the SCAQMD LST significance threshold values for selected construction activities and locations. Therefore, the daily emissions from the Project would temporarily cause significant and unavoidable impacts to sensitive receptors (Class I). The CPUC finds that specific economic, legal, social, technological, and other considerations make infeasible additional mitigation measures or Project alternatives to reduce Impact AQ-2 to a less-than-significant level.

Rationale for Finding. During construction of the Project within the SCAQMD, construction emissions will create a short-term, but significant, impact by exceeding the daily PM_{2.5} and PM₁₀ LST significance thresholds. Even with implementation of Mitigation Measures AQ-1a and AQ-1b, this impact will remain unavoidable. There are no other feasible mitigation measures or alternatives available to reduce the significant air quality impact to a level that will be less than significant.

Reference. Section D.2 (Air Quality) of the original EIR provides a complete assessment of the air quality impacts of the Project.

Impact AQ-3: Emissions Contribute to Climate Change

As discussed in Section D.2.3.3 of the original EIR, the Project would cause greenhouse gas (GHG) emissions during the short-term duration of project construction. During operation of the Project, minor quantities of long-term greenhouse gas emissions would also occur. There would be a minimal increase in the inspection and maintenance emissions for the new subtransmission lines; however, these increases would be somewhat offset because the Project would provide greater transmission effectiveness and efficiency that could slightly reduce power generation requirements and line loss totals, which together may cause a slight indirect reduction in greenhouse gases from power plants connected to the grid during project operation. An unquantifiable direct air quality impact of subtransmission system operation would be the potential escape of SF₆, a potent greenhouse gas, used in operation of the electrical switchgear equipment and circuit breakers. Because of the high global warming potential of SF₆ even small quantities of emissions are a concern. Any increase in SF₆ emissions would result in a net increase of GHG emissions and a significant impact.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact AQ-3 to the extent feasible. Specifically, implementation of Mitigation Measure AQ-3 (listed below) would reduce impacts to air quality during construction to the maximum degree feasible but would not eliminate all significant impacts. The Project's GHG emissions, even after implementation of these feasible mitigation measures, would remain significant and unavoidable. The CPUC finds that specific economic, legal, social, technological, and other considerations make infeasible additional mitigation measures or Project alternatives to reduce Impact AQ-3 to a less-than-significant level.

AQ-3 Avoid Sulfur Hexafluoride Emissions. SCE shall ensure that Project equipment, specifically the circuit breakers at the El Casco Substation, maintain a leakage rate of 0.5 percent per year or less for sulfur hexafluoride (SF₆). To accomplish this, SCE shall include this limit as a performance specification for the circuit breakers that would be installed as part of the Project. Maintenance, repair, and replacement of all circuit breakers shall be in a manner that ensures continued compliance with this performance specification. SCE shall demonstrate compliance with this limit by submitting an annual report of SF₆ emissions for the El Casco Substation to the CPUC. This report should contain information regarding leaks that are detected at the substation and the actions that were taken to address such occurrences. The annual SF₆ emission rate is defined as total SF₆ emissions from the El Casco Substation for the most recent reporting year divided by total name-plate capacity of SF₆ at the El Casco Substation (i.e., the total quantity of SF₆ contained in electrical equipment at the end of the reporting year). The annual report of SF₆ emissions at the El Casco Substation shall be submitted to the CPUC until the California Air Resources Board

enacts a program to report and restrict SF₆ emissions from the electricity sector under the California Global Warming Solutions Act of 2006 (AB32). SCE shall report SF₆ emissions to the California Climate Action Registry (CCAR) according to CCAR methodologies or alternate methodology approved by the California Air Resources Board. This report shall include the El Casco Substation and indirect GHG emissions from energy imported and consumed to support operation of the system and indirect GHG emissions from transmission and distribution losses.

Rationale for Finding. SCE currently takes voluntary steps to address the issue of SF₆ escape by participating in the U.S. EPA SF₆ Emissions Reduction Partnership for Electric Power Systems, however, to ensure that all feasible SF₆ reduction strategies are implemented, Mitigation Measure AQ-3 would be required to minimize the impact of SF₆ escape. Although the measure would reduce SF₆ escape, it would not be possible to entirely eliminate this impact. Therefore, the direct impact of the Project on greenhouse gases would remain significant and unavoidable (Class I).

Reference. Section D.2 (Air Quality) of the original EIR provides a complete assessment of the air quality impacts of the Project. Section 4.2 (Revisions to the Original Draft EIR) of the Recirculated Final EIR contains revisions to Section D.2 (Air Quality) of the original EIR, including revisions to Mitigation Measure AQ-3.

Cumulative Air Quality Impacts: Construction emissions would cumulatively exceed regional emission thresholds (AQ-1), exceed localized emission thresholds (AQ-2), or contribute to greenhouse gases (AQ-3)

As discussed in Section F.1.5.1 (Cumulative Impact Analysis – Air Quality) of the original Draft EIR, there is the possibility that a variety of projects will occur at the same time as Project construction. A number of projects were identified in California in the SCAQMD jurisdiction listed in Table F-2 of the original Draft EIR. In the areas where Project construction may occur simultaneously with future and proposed construction projects within one mile of the Project, the combined effects of air quality pollutants generated by the Project and other development will result in cumulative impacts to receptors and exceedances of both regional (AQ-1) and local emission (AQ-2) thresholds. In addition, overall future development of the area coupled with the fact the air basin cumulative development is located within is currently in non-attainment for existing air quality criteria, all future emissions would result in significant cumulative impacts to air quality under regional (AQ-1) and local emission (AQ-2) thresholds.

A small amount of greenhouse gas emissions, as compared to statewide totals, would be emitted temporarily during the Project's construction activities (AQ-3). However, an unquantifiable direct air quality impact of transmission system operation would be the potential escape of SF₆, a potent greenhouse gas, used in operation of the electrical switchgear equipment and circuit breakers. Any increase in SF₆ emissions would result in a net increase of GHG emissions and an adverse impact to climate change. Therefore, the direct impact of the Project on greenhouse gases would be adverse and result in a significant unavoidable cumulative contribution (Class I) to climate change when combined with the cumulative development in the project area which is also generating greenhouse gases.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate its significant cumulative effects for Cumulative Impacts AQ-1, AQ-2, and AQ-3 to the extent feasible. Specifically, Mitigation Measures AQ-1a, AQ-1b, and AQ-3 (listed above) will reduce the Project's contribution to cumulative impacts to the extent feasible. However, the Project's contribution to significant cumulative impacts AQ-1, AQ-2, and AQ-3 will remain cumulatively considerable and significant. The CPUC finds that specific economic, legal, social, technological, and other considerations make infeasible additional mitigation measures or Project alternatives to reduce the project's cumulative impacts AQ-1, AQ-2, and AQ-3 to less than significant/cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Pollutants generated from construction of these projects would potentially result in an impact on ambient air quality that will overlap with those of the Project, if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects would further exacerbate the significant Project-related construction and operation impacts. Mitigation Measures AQ-1a, AQ-1b, and AQ-3 will reduce the Project's contribution to cumulative impacts to the extent feasible. However, impacts will remain significant after mitigation within SCAQMD jurisdiction. There are no other feasible mitigation measures or alternatives available to reduce the significant cumulative air quality impacts to a level that will be less than significant.

Reference. Section F.1.5.1 (Cumulative Impact Analysis – Air Quality) of the original Draft EIR provides a complete assessment of the cumulative impact on air quality. Section D.2 (Air Quality) of the original Draft EIR provides a detailed description of the effects of the Project on air quality and the SCAQMD CEQA significance determination methodologies.

IV.3.2 Biological Resources

Cumulative Biological Resources Impacts: Cumulative project activities would cause temporary or permanent loss of biological resources (B-1 through B-21)

As discussed in Section F.1.5.3 (Cumulative Impact Analysis – Biological Resources) of the original Draft EIR, there is the possibility that a variety of projects, as listed in Table F-2 of the original Draft EIR, will occur at the same time as Project construction and would disturb adjacent biological resources if the projects in these clusters were to occur simultaneously. Fragmentation of habitat and the loss of genetic variability between populations by severing linkages and movement corridors will continue to occur as development encroaches on remaining habitat assemblages. While all Project impacts would be mitigated to below the level of significance through the implementation of the MSHCP process and mitigation measures described in original Draft EIR Section D.3 (Biological Resources), the continued loss of habitat region wide will result in continued significant cumulative impacts B-1 through B-21 to sensitive biological resources.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate its significant effects to the environment from cumulative Impacts B-1 through B-21 to the extent feasible. Specifically, Mitigation Measures B-1a, B-1b, B-3a, B-3b, B-4, B-5a, B-5b, B-5c, B-6, B-9, B-10, B-13a, B-13b, B-18, and B-19 (identified above in section IV.2.2) will reduce Project impacts to the extent feasible. However, impacts will remain significant and unavoidable. The CPUC finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or Project alternatives to reduce cumulative impacts B-1 through B-21 to less than significant/cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Biological Resources impacts from construction of these projects will likely result in an increase to adjacent land disturbance that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects will further exacerbate the significant Project-related Biological Resources impacts. Mitigation measures identified for the Project, as identified above will reduce the Project's contribution to significant cumulative biological impacts B-1 through B-21 to the greatest extent feasible. However, the possibility remains that the Project's less than significant impacts will combine with the impacts of other projects to result in a significant cumulative impact. Therefore, the Project's contribution to this impact will remain cumulatively considerable. There are no additional feasible mitigation measures that would further reduce the Project's contribution to cumulative impacts B-1 through B-21.

Reference. Section F.1.5.3 (Cumulative Impact Analysis – Biological Resources) of the original EIR provides a complete assessment of the cumulative impact on biology. Section D.4 (Biological Resources) of the original EIR provides a detailed description of the effects of the Project on Biology and the associated mitigation measures.

IV.3.4 Hazards and Hazardous Materials

Cumulative Hazards and Hazardous Materials Impact: Cumulatively expose people or structures to a significant risk of loss, injury or death involving wildland fires (HAZ-8).

As discussed in Section F.1.5.6 (Cumulative Impact Analysis – Hazards and Hazardous Materials) of the original Draft EIR, a notable portion of the Project lies within the high fire probability zone. Although measures would be implemented during project construction and operation to reduce the risk of causing a wildfire, the Project would increase risk of fire ignition. The proposed development projects identified in Table F-2 (Cumulative Project List) of the original Draft EIR would also increase the potential for a fire to occur within the project area. Therefore, the Project, when combined with the effects of other past and reasonably foreseeable projects, would considerably contribute to a significant cumulative impact.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from cumulative impact HAZ-8 to the extent feasible. These measures are identified as HAZ-8a, HAZ-8b, HAZ-8c, and HAZ-8d and are listed above in Section IV.2.5. However, even with incorporation of these mitigation measures, the Project's contribution to the significant cumulative impact that would occur from exposure people or structures to a significant risk of loss, injury, or death involving wildland fires is cumulatively considerable. The CPUC finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or Project alternatives to reduce cumulative impact HAZ-8 to less than significant/cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Hazards and Hazardous Materials impacts from construction of these projects could result in an increase in risk of fire to adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of the cumulative projects could further exacerbate the significant Project-related potential wildland fire impacts. Mitigation Measures HAZ-8a, HAZ-8b, HAZ-8c, and HAZ-8d would reduce the Project's contribution to this impact to the greatest extent feasible. However, the possibility remains that the Project's less than significant impact could combine with the impacts of other projects to result in a significant cumulative impact. Therefore, the Project's contribution to this impact will remain cumulatively considerable, and there are no additional feasible mitigation measures that would further reduce the Project's contribution.

Reference. Section F.1.5.6 (Cumulative Impact Analysis – Hazards and Hazardous Materials) of the original Draft EIR provides a complete assessment of the cumulative impact on fire impacts. Section D.7 (Hazards and Hazardous Materials) of the original Draft EIR provides a detailed description of the effects of the Project on Hazards and Hazardous Materials.

IV.3.5 Hydrology and Water Quality

Cumulative Hydrology and Water Quality Impacts: Cause cumulative soil erosion and sedimentation through construction activities that would degrade water quality (HYD-1), or degradation of surface water or groundwater quality from the accidental release of potentially harmful materials during construction (HYD-2) and operational activities (HYD-3).

As discussed in Section F.1.5.7 (Cumulative Impact Analysis – Hydrology and Water Quality) of the original Draft EIR, surface waters throughout the project area have experienced varying amounts of sedimentation as a result of erosion from past projects and are likely to experience similar impacts from other projects that would require substantial grading, as listed in Table F-2 in the original Draft EIR. Water Quality APMs HYDRO-1, HYDRO-2a, HYDRO-2c, HYDRO-7, and GEO-1 would be implemented as part of the Project to decrease the potential for soil erosion and sedimentation. Construction projects that involve ground disturbance are also required to comply with various permits and regulatory requirements that require implementation of specific measures to prevent soil erosion and sedimentation from entering local waterways. Although these measures would reduce the impact of individual projects to less-than-significant levels, it is likely that minor amounts of sedimentation would occur. Over time, sediment from multiple projects would be expected to eventually accumulate in downstream water bodies such as San Timoteo Creek, the Santa Ana River, Potrero Creek, the San Jacinto River, Canyon Lake, Lake Elsinore, the San Gorgonio River, Whitewater River, and the Salton Sea. Therefore, the Project, when combined with the effects of other past and reasonably foreseeable projects, would result in a cumulatively considerable contribution to significant cumulative impact HYD-1.

Water Quality APMs HYDRO-2a through HYDRO-2d, HYDRO-3, HYDRO-6, and HYDRO-8 would be implemented as part of the Project to decrease the potential for accidental releases of hazardous materials used during construction to occur and to clean up potentially harmful materials in the event of a release. However, Horizontal Directional Drilling (HDD) activities would still have the potential to impact surface and groundwater quality during construction. Many of the cumulative development projects identified, including the Seneca Springs, Jack Rabbit Trail, and Shadow Creek developments, would be implemented in close proximity to San Timoteo Creek. An accidental release of pollutants at any of these future projects located near San Timoteo Creek and as a result of HDD activities of the Project would potentially combine to result in a significant cumulative impact HYD-2 to surface water or groundwater quality. Mitigation Measures HYD-2a through HYD-2d, GEO-1, GEO-2a, and GEO-2b, described above in Sections IV.2.4 and IV.2.6, included as part of the Project would minimize the Project's contribution to this cumulative impact, but it would remain at a significant level.

Cumulative development projects, including the Seneca Springs Jack Rabbit Trail, and Shadow Creek developments, would be implemented within close proximity of San Timoteo Creek. An accidental release of pollutants at any of these future projects located near San Timoteo Creek and as a result of operation and maintenance activities of the Project would combine to result in a significant unavoidable cumulative impact to surface water quality (HYD-3).

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from cumulative Impacts HYD-1, HYD-2 and HYD-3 to the extent feasible. Mitigation Measures HYD-1a through HYD-1d, HYD-2a through HYD-2d, (included above in Section IV.2.6, Hydrology and Water Quality); and GEO-1 and GEO-2 (included above in Section IV.2.4, Geology and Soils) will reduce the Project's contribution to these impacts to the greatest extent feasible. However, even with incorporation of these mitigation measures, the Project's contribution to the significant cumulative impacts that would occur from Impacts HYD-1, HYD-2 and HYD-3 is cumulatively considerable. The CPUC finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or Project alternatives to reduce cumulative impacts HYD-1, HYD-2, and HYD-3 to less than significant/cumulatively considerable.

Rationale for Finding. There is the possibility that a variety of projects will occur at the same time as construction of the Project. Hydrology and Water Quality impacts from construction and operation of these projects could result in an increase in impacts to adjacent land uses that will overlap with those of the Project if the construction work occurs in close proximity as well as at the same time. Construction of

the cumulative projects would further exacerbate the significant Project-related water quality impacts. Implementation of mitigation measures identified for the Project will remain applicable, including APMs HYDRO-1, HYDRO-2a through HYDRO-2d, HYDRO-3, HYDRO-6, HYDRO-7, HYDRO-8, GEO-1, and Mitigation Measures HYD-1a through HYD-1d, HYD-2a through HYD-2d, (included above in Section IV.2.6, Hydrology and Water Quality); and GEO-1 and GEO-2 (included above in Section IV.2.4, Geology and Soils) will reduce the Project's contribution to these impacts to the greatest extent feasible. However, the possibility remains that the Project's less than significant impacts will combine with the impacts of other projects to result in a significant cumulative impact. Therefore, the Project's contribution to this impact will remain cumulatively considerable, and there are no additional feasible mitigation measures that would further reduce the Project's contribution to significant cumulative Hydrology and Water Quality impacts HYD-1, HYD-2, and HYD-3.

Reference. Section F.1.5.7 (Cumulative Impact Analysis – Hydrology and Water Quality) of the original EIR provides a complete assessment of the cumulative impact on water quality impacts. Section D.8 (Hydrology and Water Quality) of the original Draft EIR provides a detailed description of the effects of the Project on Hydrology and Water Quality.

IV.3.6 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 and V-10 through V-12)

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 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 the Project would be adverse but less than significant. However, 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 three 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 three projects include:

- Devers-Palo Verde No. 2 (DPV2) Transmission Line Project (No. A2)
- Liberty XXIII Renewable Energy Biomass Project (No. E1)
- Sunset Substation and Transmission and Distribution Project (No. E2)

The Project 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 cumulative impact V-3 to less than significant/cumulatively considerable. Implementation of mitigation measures identified for the

Project will remain applicable (Mitigation Measures V-3a and V-3b as listed above in Section IV.2.9) and will reduce the Project's contribution to these impacts to the greatest extent feasible. However, the possibility remains that the Project's less than significant (Class III) and less than significant with mitigation (Class II) impacts at key viewpoints 1, 4, 5, and 6 (Impacts V-3, V-6 through V-8), with regards to overhead transmission line, and at key viewpoint 10 (Impact V-12), for overhead fiber optic infrastructure, will combine with the visual impacts of other projects to result in a significant cumulative visual impact. In addition, at key viewpoints 2 and 3 (Impacts V-4 and V-5) for the El Casco Substation at key viewpoint 8 (Impact V-10) for the Zanja Substation, and at key viewpoint 9 (Impact V-11) for the Mill Creek Communications Site, the Project will combine with the visual impacts of other projects to result in a significant cumulative visual impact at these locations. Therefore, the Project's contribution will be cumulatively considerable, and there are no additional feasible mitigation measures that will further reduce the Project's contribution to significant cumulative visual impacts V-3 through V-8 and V-10 through V-12 with regard to transmission and fiber optic line, tower infrastructure, communications infrastructure (Mill Creek), and El Casco and Zanja Substation infrastructure.

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 F.1.5.11 (Cumulative Impact Analysis – Visual Resources) of the original Draft EIR provides a complete assessment of the cumulative impact on visual resources. Section D.12 (Visual Resources) of the original EIR provides a detailed description of the effects of the Project on visual resources.

V. Findings on Rejected Mitigation Measures

The CPUC finds that specific economic, legal, social, technological, and other considerations make infeasible Mitigation Measures HAZ-9a and Haz-9b, and V-10 identified in the original Draft EIR. Specifically, these measures are not legally feasible because the Project would not have a significant effect on radio and television interference (Impact HAZ-9), or increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 8 (Impact V-10). A lead agency may not impose mitigation unless there is an essential nexus between such mitigation and an impact of the project. (See CEQA Guidelines § 15126.4(a)(4).) The Final Recirculated EIR concludes that the Project would not result in a conductor surface electrical gradient, as this condition does not occur on subtransmission lines energized at less than 200 kV. Therefore, radio/television/equipment interference would not increase over existing conditions and impacts will be less than significant. Because this impact is less than significant, no mitigation measures may be imposed to reduce it (see Recirculated Final EIR p. 4-31). The original Final EIR concludes that Impact V-10 would be less than significant and therefore no mitigation measures may be imposed to reduce it (see original Final EIR p. 4-45).

In addition, the CPUC finds that any modifications made to mitigation measures since they were originally presented in the original Draft EIR (December 2007) merely clarify and amplify such measures and do not decrease their effectiveness or increase the severity of the impact which they are designed to reduce. Accordingly, none of these minor modifications and clarifications trigger recirculation per CEQA Guidelines § 15088.5.

VI. Alternatives to the Project

Eight potential alternatives were evaluated at a preliminary level during the alternatives screening process. These alternatives range from minor routing adjustments to SCE's Proposed Project route, to entirely different subtransmission line routes, to alternate substation sites. Demand-side management was also considered. Six of these alternatives were eliminated either because they did not meet project objectives, did not meet legal, regulatory, and technical feasibility criteria, and/or did not avoid or reduce environmental effects of the Project, as explained in detail in the Alternatives Screening Report found in Appendix 1 of the original Draft EIR. The CPUC hereby finds that all of the alternatives eliminated from further consideration in the original Draft EIR are infeasible, would not meet most Project objectives and/or would not reduce or avoid any of the significant effects of the Proposed Project, as summarized in Table Ap-2 in Appendix 1 of the original Draft EIR.

Two alternatives to the Proposed Project were carried forward and analyzed in detail in the EIR: the "Northerly Route Alternative Option 3" and the "Partial Underground Alternative". These alternatives were designed to potentially minimize the effects of the proposed subtransmission line on sensitive receptors (in particular residences located between the Maraschino and Banning Substations) adjacent to the Proposed Project route. The EIR also analyzed a "No Project" alternative. Findings on each alternative are presented below.

VI.1 Northerly Route Alternative Option 3

This 21.8-mile route was recommended by CPUC and refined by SCE. Route Alternative Option 3 would consist of: (1) rebuilding the entire El Casco-Maraschino 115 kV subtransmission line; (2) rebuilding a portion of the Banning-Maraschino 115 kV subtransmission line; and (3) creating the El Casco-Banning and El Casco-Zanja 115 kV subtransmission lines from a combination of new construction and rebuilding of a portion of the existing Devers-Banning-Windpark-Zanja 115 kV subtransmission line. 9.5 miles of this route would be new 115 kV subtransmission line located in an existing SCE transmission line corridor that currently consists of the Devers-San Bernardino No. 1 and No. 2 220 kV transmission lines, and the Devers-Vista double-circuit 220 kV transmission line. 5.8 miles of upgrades would occur between El Casco and Maraschino Substations in the same ROW as the Proposed Project. This alternative would avoid the Proposed Project construction activities between Maraschino and Banning Substations. SCE's existing single-circuit 115 kV subtransmission line in this area is currently energized only during emergency situations. With this alternative, this existing line would be energized at all times. The remaining 6.5 miles of this route would occur between Banning Substation and the "Zanja Break-off" and would consist of replacing existing wood single-circuit subtransmission structures with new steel single-circuit structures.

Finding/Rationale. The CPUC finds that specific economic, legal, social, technological, and other considerations, including those considerations set forth in the EIR, make the Route Alternative Option 3 infeasible. Specifically, this alternative is environmentally less desirable than the adopted Project because the environmental impacts it would cause would be more severe, as it would impact a greater number of residential structures when compared to the Proposed Project. Specifically, this alternative would impact approximately 303 residential structures as compared to the approximately 237 residential structures that the Proposed Project would impact. Additionally, the siting of new steel poles for the 115 kV subtransmission line associated with this alternative would result in a significant unavoidable impact resulting from the removal of, or damage to, elements (i.e., street lights and existing mature trees) that could contribute to the integrity of a potential historic district (Impact CR-4). Further, the existing view to the west from Summit Drive, just east of North Alessandro Street in the City of Banning, would be impacted significantly (Impact V-13), which would not occur under the Proposed Project. Therefore, the

Northerly Route Alternative Option 3 is found to be environmentally less desirable than the Proposed Project because of the added significant impacts and the increase in the level of severity of impacts.

Reference. Section E (Comparison of Alternatives) of the Recirculated Draft EIR provides a comparison of impact assessment of the CPUC's Northerly Route Alternative Option 3 as compared to SCE's Proposed Project.

VI.2 Partial Underground Alternative

The Partial Underground Alternative was developed as a partial overhead/underground alternative due to comments raised during the scoping process. This alternative would contain the same elements as the proposed El Casco System Project, except for the approximately one-mile portion of the alignment through the Sun Lakes community. With this alternative, the existing H-frame wood poles for SCE's existing overhead single-circuit 115 kV subtransmission line through the Sun Lakes community would be removed, and a new double-circuit 115 kV subtransmission line would be installed underground within the existing SCE ROW between approximately Mile 9.0 and 10.0, beginning just east of Highland Springs Avenue and ending just east of S. Riviera Avenue and west of S. Highland Home Road. Once through the Sun Lakes community, at approximately Mile 9.9, the new double-circuit 115 kV subtransmission line would transition back to overhead construction as described for the Proposed Project. This alternative would require approximately 10 fewer new steel poles (assuming one pole every 400 to 800 feet, which is the same as the current spacing), as the subtransmission lines would be placed underground rather than on overhead infrastructure.

Finding/Rationale. The CPUC finds that specific economic, legal, social, technological, and other considerations, including those considerations set forth in the EIR, make this alternative infeasible and less desirable than the adopted Project and rejects this alternative because it will have greater environmental impacts. As discussed in Section E.2.1.2 of the Recirculated Draft EIR, this alternative would increase air quality emissions due to an increase in overall construction activities and intensity. In addition, due to the longer schedule required for construction of the underground portion (10 months versus 2 months to construct the overhead subtransmission line in the same one-mile area), the duration of exposure to air quality impacts would also be longer with this alternative than that experienced with the Proposed Project. This alternative would also result in significant and unavoidable temporary disruptions to the Sun Lakes Community and Sun Lakes Country Club golf course (Impacts LU-2) and temporary disruptions of recreational activities such that recreational values would be reduced at the Sun Lakes Country Club golf course (Impact LU-8) as discussed in Section D.3.5.2 of the original Draft EIR.

While this alternative would eliminate existing visual impacts from adjacent viewpoints along the undergrounded portion and improve the long-term use of the Sun Lakes Country Club golf course, none of these existing impacts are connected to, or would come about because of, the Proposed Project. The Partial Underground Alternative would only be "environmentally superior" to the Proposed Project under CEQA if it reduced significant impacts that would be caused by the Proposed Project. This is consistent with the constitutional requirements set forth in CEQA Guidelines §15126.4(a)(4), which require a "rough proportionality" between the impacts of the project and the measures identified to reduce or avoid those impacts (*Dolan v. City of Tigard* (1994) 512 U.S. 374) and that there be an essential nexus (i.e., connection) between a legitimate governmental interest and the measures identified to further that interest (*Nollan v. California Coastal Commission* (1987) 483 U.S. 825). This principle is further supported by the California Supreme Court's recent decision, *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (June 5, 2008) 43 Cal.4th 1143 ("*In re Bay-Delta*"). In *In re Bay-Delta*, the Supreme Court found that an alternative could not be determined "environmentally superior" just because it would more effectively address existing environmental problems than the proposed project. It explained that "those problems would continue to exist even if there were no [project], and thus under

CEQA they are part of the baseline conditions rather than program-generated environmental impacts that determine the required range of program alternatives.” The same situation occurs here (i.e., the visual and land use impacts that currently affect that Sun Lakes Community would continue to exist if the Proposed Project were not adopted). Therefore, they are part of the baseline conditions and are not generated by the Project.

Further, the Partial Underground Alternative would result in the same long-term environmental impacts as the adopted Project, and would result in greater short-term construction impacts in all resource areas analyzed in the EIR over a longer period of time due to the intense construction activities that would occur during the 10-month construction period required to construct this alternative. In addition, short-term construction impacts for the Partial Underground Alternative would be significant and unavoidable with respect to land use.

Reference. Section E (Comparison of Alternatives) of the Recirculated Draft EIR provides a comparison of impact assessment of the Partial Underground Alternative as compared to SCE’s Proposed Project.

VI.3 No Project Alternative

Under the No Project Alternative, construction and operation of the El Casco System Project would not occur. The baseline environmental conditions for the No Project Alternative are the same as for the Project. The baseline conditions would continue to occur into the future, undisturbed, in the absence of project-related construction activities.

The objectives of the Project would remain unfulfilled under the No Project Alternative. SCE’s existing 15.4 miles of single-circuit 115 kV subtransmission line within existing SCE ROWs in the Cities of Banning, Beaumont, and Yucaipa, and within unincorporated Riverside County, would remain in place and would not be replaced with a double-circuit 115 kV subtransmission line. Existing 115 kV switchracks within Zanja and Banning Substations also would not be replaced, and improved system reliability and operating flexibility associated with the Project would not occur.

The absence of the Project may lead SCE or other developers to pursue other actions to achieve the objectives of the Project. The events or actions that are reasonably expected to occur in the foreseeable future without the El Casco System Project include the following:

- Overload of existing capacities would occur at five distribution substations that are currently served by the Vista and Devers 115 kV Systems (Crafton Hills, Maraschino, Mentone, Zanja, and Banning Substations).
- As new facilities are added, the system would experience system-wide power flow and reliability problems due to overloading of the existing system, such as curtailed generation, thermal overload, and blackouts.
- The existing single-circuit 115 kV line between Maraschino and Banning Substations would have to carry load at all times and would not be available for emergency overload events, thereby compromising the reliability of the system.
- To address the overload conditions in the Maraschino Substation service area, SCE added a third 28 MVA transformer and two 12 kV distribution lines (each approximately 9 miles in length) at Maraschino Substation in 2007.
- Switchrack rebuilds at Banning and Zanja Substations would need to be completed.
- SCE would be required to implement demand-side management (DSM) programs to reduce customer energy consumption and overall electricity use.

- SCE would ultimately be required to either upgrade existing subtransmission infrastructure, or build new subtransmission facilities along a different and unspecified alignment at some point in the immediate future.

Finding/Rationale. The CPUC finds that specific economic, legal, social, technological, and other considerations, including those considerations set forth in the EIR, make this alternative infeasible and less desirable than the adopted Project and therefore rejects this alternative. Specifically, the No Project Alternative is environmentally less desirable than the adopted Project and it would not meet the Project objectives. As discussed in Section E.3 of the Recirculated Draft EIR, the environmental impacts of the No Project Alternative would primarily result from construction of new subtransmission infrastructure. These impacts include substantial air emissions as well as visual impacts of the new subtransmission lines depending on their locations. Therefore, because the No Project Alternative would also require construction of subtransmission lines with impacts similar to those described for the Project, the CPUC finds that the No Project Alternative is infeasible and less desirable than the Project.

The No Project Alternative would compromise system reliability and would lead to overloads, and would therefore not obtain the Project objective of providing enhanced system reliability. This alternative would also require the 115 kV line between Maraschino and Banning Substations to carry load at all times and would not be available for emergency overload events. This would interfere with the Project objective to provide greater operational flexibility to transfer load between lines and substations. Additionally, the No Project Alternative would result in the construction of 12 kV lines approximately nine miles in length, which significantly exceeds the maximum preferred distribution line length of approximately four miles. This would not attain the Project objective of providing safe and reliable electrical service consistent with SCE's planning guidelines and Subtransmission Guidelines.

Reference. Section C.6 (No Project Alternative) of the original Draft EIR provides a complete description of the No Project Alternative. Section E (Comparison of Alternatives) of the Recirculated Draft EIR provides a comparison of impact assessment of the No Project Alternative as compared to SCE's Proposed Project.

VII. Findings Regarding Other CEQA Considerations

VII.1 Growth Inducing Impacts

The growth-inducing potential of a project will be significant if it fosters growth or a concentration of population above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth impacts could also occur if a project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies.

Finding/Rationale. Both locally and regionally, the project area is experiencing substantial population growth, which is reflected in a large number of proposed and planned future residential development projects. The Project is not intended to supply power related to growth for any particular development, either directly or indirectly. The subtransmission line will be built to ensure that safe and reliable electric service is available to meet customer electrical demand without overloading the existing electrical facilities that supply northern Riverside County. The Project will increase power reliability by providing load relief to the Vista and Devers Systems through the transfer of load from the Banning, Maraschino, Mentone, Crafton Hills, and Zanja Substations to the newly created El Casco System; and by allowing load transfers between the Devers, Vista, and the new El Casco Systems under both normal and abnormal conditions. The Project would accommodate the anticipated future load growth in a timely manner and would be consistent with local planning documents and policies regarding population growth. Any

growth that occurs with the availability of the additional power provided by the Project would need to conform to the local planning documents and policies. Although the Project would not directly result in growth in the area, its implementation would remove future obstacles to population growth by facilitating the transmission of future projected power generation in the Project area (Section F.1.3.2 of the original Draft EIR).

VII.2 Significant Irreversible Environmental Changes

Irreversible and irretrievable environmental changes caused by a project include uses of nonrenewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from project-related accidents.

Finding/Rationale. The subtransmission line construction phase would require an irretrievable commitment of natural resources from direct consumption of fossil fuels, construction materials, the manufacture of new equipment that largely cannot be recycled at the end of the Project's useful lifetime, and energy required for the production of materials. Additionally, construction would require the manufacture of new materials, some of which would not be recyclable at the end of the Project's lifetime, and the energy required for the production of these materials, which would also result in an irretrievable commitment of natural resources (Section F.1.2 of the original Draft EIR).

The construction of the proposed El Casco Substation would result in permanent loss of open space land. Impacts to biological species from this permanent conversion of land use are presented in original Draft EIR Section D.4, Biological Resources. With the implementation of mitigation presented in Section D.4, permanent impacts to these resources would be less than significant. As discussed in original Draft EIR Section D.3, Land Use, the permanent conversion of this land to a substation facility was found to be less than significant with the incorporation of mitigation measures.

VII.3 Responses to Comments on the Draft EIR and Revisions to the Final EIR

The originally published Final EIR (April 2008) includes the comments received on the originally published Draft EIR (December 2007) and responses to those comments. The Recirculated Final EIR includes responses to comments received during the Recirculated Draft EIR comment period (July 9, 2008 through August 22, 2008); updated responses to comments previously received during the original Draft EIR comment period (December 12, 2007 through January 25, 2008) that were revised in light of the new information and analysis contained in the Recirculated Draft EIR (July 2008); and any text changes resulting from the comments submitted during the Recirculated Draft EIR comment period (July 9, 2008 through August 22, 2008) and further analysis of the feasibility of mitigation measures. 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. With the exception of the new information that triggered recirculation of the analysis of noise and the comparison of alternatives in the original Final EIR, responses to comments made on both the originally published and recirculated Draft EIRs and revisions made to those documents merely clarify and amplify the analysis presented in the documents and do not trigger recirculation per CEQA Guidelines §15088.5(f)(2).

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

Public Resources Code §21081.6 requires this Commission to adopt a monitoring or reporting program regarding the changes in the project and mitigation measures imposed to lessen or avoid significant effects on the environment. The Mitigation Monitoring and Reporting Program is adopted because it fulfills the CEQA mitigation monitoring requirements:

- The Mitigation Monitoring and Reporting Program is designed to ensure compliance with the changes in the project and mitigation measures imposed on the project during project implementation.
- Measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.

The El Casco System Project Mitigation Monitoring and Reporting Program is included as Section G of the original Final EIR.

IX. Mitigation Monitoring and Reporting

The following is from the original Final EIR, Section G, Mitigation Monitoring and Reporting.

This EIR includes a proposed Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) for the mitigation measures proposed herein for the El Casco System Project (Project). An MMCRP table for the Project and the alternatives is provided at the end of each issue area's environmental analysis in Section D (D.2 through D.12). This section provides the recommended framework for the implementation of the MMCRP by the CEQA Lead Agency, the California Public Utilities Commission (CPUC), and describes the roles and responsibilities of government agencies in implementing and enforcing adopted mitigation.

IX.1 Authority for the Mitigation Monitoring, Compliance, and Reporting Program

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval be implemented properly, monitored, and reported. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a MMCRP when it approves a project that is subject to preparation of an EIR, and where the EIR for the project identifies significant adverse environmental effects. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The purpose of a MMCRP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMCRP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The CPUC hereby adopts the MMCRP as part of EIR certification and issuance of Permit to Construct (PTC) application approval process. The MMCRP contains the mitigation measures ultimately made a condition of approval by the Commission.

IX.2 Organization of the Final Mitigation Monitoring Implementation Plan

The MMCRP serves as a self-contained general reference for the mitigation monitoring activities that will be conducted by the CPUC for the El Casco System Project. To accomplish this, a Final Mitigation Monitoring Implementation Plan will be prepared using the CPUC's adopted MMCRP and containing the

four major components listed and described below. The elements of the Mitigation Monitoring Implementation Plan are as follows:

MMCRP Introduction

- Authority and Purpose of the Program
- Program Adoption Process
- Organization of the MMCRP

Roles and Responsibilities

- Monitoring Responsibility
- Enforcement Responsibility
- Mitigation Compliance Responsibility
- Dispute Resolution

General Monitoring Procedures

- Environmental Monitor
- Construction Personnel
- General Reporting Requirements
- Public Access to Records

IX.2.1 MMCRP Introduction

This section of the Final Mitigation Monitoring Implementation Plan will contain a concise overview and reference description of the approved MMCRP for the El Casco System Project that clearly outlines the physical location and timetable for the Project, including construction phases and spreads. This section will also specify the “master” reference(s) which the CPUC environmental monitors and the Applicant will use in carrying out the Program, e.g., the Final EIR, but also more detailed working maps and plans. The Applicant-Proposed Measures, to which SCE has committed to reduce potential impacts, will also be listed in this section.

This section will include the list of agencies with jurisdiction over the Project (from EIR Table A-1), and a description of where their respective jurisdictions exist. For example, for a given construction spread, this section will state what region of the California Department of Fish and Game has jurisdiction, and it will provide the name of the regional manager, the address, telephone, and fax numbers. This section will also provide a guide to the organization of the document.

IX.2.2 Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor the El Casco System Project to ensure that the required mitigation measures and Applicant-Proposed Measures are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of the MMCRP and has primary responsibility for its implementation. The purpose of the MMCRP is to document that the mitigation measures required and adopted by the CPUC are implemented, and that mitigated environmental impacts are reduced to the level identified in the certified EIR.

The CPUC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities. The number of construction monitors assigned to the Project will depend on the number of concurrent construction activities and their locations. The CPUC, however, will ensure that each person with delegated duties or responsibilities is qualified to monitor compliance.

Any study or plan required by a mitigation measure also requires the approval of the CPUC and must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation action or program be developed during the design phase of the Project, the Applicant (SCE) must submit the final program to the CPUC for review and approval at least 60 days before the start of construction, and/or implementation of that program, whichever comes first. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor assigned to the Project to ensure that appropriate agency reviews and approvals are obtained.

The CPUC along with its environmental monitors will also ensure that any variance process or deviation from the procedures identified under the MMCRP is consistent with CEQA requirements; no project variance will be approved by the CPUC if it creates new significant impacts. As defined in this section, a variance should be strictly limited to minor project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved Project, adopted mitigation measures, and Applicant-Proposed Measures, and correction of such deviation, shall be reported immediately to the CPUC and the environmental monitor assigned to the construction spread for their review and approval. In some cases, a variance may also require approval by a CEQA responsible agency.

Enforcement Responsibility

The CPUC is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction phase or spread. The environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CPUC.

The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the El Casco System Project if the activity is determined to be a deviation from the approved Project or adopted mitigation measures. The CPUC may assign this authority to the environmental monitor for each construction phase or spread.

Mitigation Compliance Responsibility

The Applicant, SCE, is responsible for successfully implementing all adopted mitigation measures in the MMCRP. The MMCRP will contain criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include success criteria that are listed in a table at the end of each issue area section in Section D of this EIR. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

The Applicant shall inform the CPUC and its monitors in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its monitors will assess whether alternative mitigation is appropriate and specify to SCE the subsequent actions required.

Dispute Resolution

It is expected that the adopted MMCRP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such event, the following procedure will be observed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Project or adopted MMCRP.
- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMCRP or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

IX.2.3 General Monitoring Procedures

Environmental Monitor

Many of the monitoring procedures will be conducted during the construction phase of the Project. The CPUC and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SCE. To oversee the monitoring procedures and to ensure success, the environmental monitor assigned to each construction phase or spread must be onsite during any Project-related activity that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, which will be detailed in the Final Mitigation Monitoring Implementation Plan, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between SCE and any construction contractors. Procedures to be followed by construction crews

will be written into a separate agreement that all construction personnel will be asked to sign, denoting consent to the procedures.

- One or more pre-construction meetings will be held to inform and train all construction personnel about the requirements of the adopted MMRP (as detailed in the Final Mitigation Monitoring Implementation Plan).
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitor assigned to the relevant construction phase or spread. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure adherence to the timing specified for the procedures. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems. The Applicant shall provide the CPUC with written quarterly reports of the Project, which shall include progress of any Project-related activity, resulting impacts, mitigation implemented, and all other noteworthy elements of the Project. Quarterly reports shall be required as long as mitigation measures are applicable.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CPUC upon request. The CPUC and the Applicant will develop a filing and tracking system. For additional information on mitigation monitoring and reporting for the El Casco System Project, the Energy Division of the CPUC will maintain an Internet website at the following address:

<http://www.cpuc.ca.gov/environment/info/aspen/elcasco/elcasco.htm>

In order to facilitate the public's awareness, the CPUC will make weekly reports available on the website.

IX.3 Condition Effectiveness Review

As required by CEQA, the CPUC must evaluate the effectiveness of the mitigation measures that are implemented. In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a mitigation monitoring program to ensure compliance during Project implementation (CEQA §21081.6):

- The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section G.2.2 of the original Draft EIR and above in Section VII.2.2; and
- If in either review, the Commission determines that any conditions are not adequately mitigating significant environmental impacts caused by the Project, or that recent proven technological advances could provide more effective mitigation, then the Commission may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the Commission's rules and practices.

IX.4 Mitigation Monitoring Program Tables

Mitigation Monitoring Program tables are presented at the end of each issue area section (Sections D.2 through D.12). These tables, along with the full text of the mitigation measures themselves, form the El Casco System Project MMCRP. The MMCRP is hereby adopted by the CPUC. The CPUC will prepare the Mitigation Monitoring Implementation Plan prior to the start of Project-related activities in order to implement the adopted MMCRP.

(END OF ATTACHMENT A)