

February 23, 2015

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75295

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California Energy Commission  
Attention: Chris Beale, Acting Executive Director, DRECP  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**SUBJECT: SOUTHERN CALIFORNIA EDISON COMPANY COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE DESERT RENEWABLE ENERGY CONSERVATION PLAN**

To the Desert Renewable Energy Conservation Plan Committee:

## **I. INTRODUCTION**

Southern California Edison Company (“SCE”) appreciates the significant efforts of the California Energy Commission (“CEC”), the U.S. Bureau of Land Management (“BLM”), the California Department of Fish and Wildlife (“CDFW”), and U.S. Fish and Wildlife Service (“USFWS”) in developing the Desert Renewable Energy Conservation Plan (“DRECP”). SCE strongly supports the DRECP’s goals to provide a landscape level approach to development of renewable energy and associated electrical transmission facilities in California’s Mojave and Colorado/Sonoran desert regions, while ensuring effective protection and conservation of the desert’s natural resources. Building upon SCE’s comments and letter of January 23, 2013 ([Attachment 1](#)), SCE respectfully provides the following comments on the October 14, 2014 draft Environmental Impact Report /Environmental Impact Statement (“DEIR/DEIS”).

[Attachment 2](#) to this letter provides SCE’s specific comments and suggested edits of the DRECP. For ease of review, the suggestions and comments in [Attachment 2](#) provide “redline” edits showing desired text, as well as references to the specific page number and section where that edit should take place. SCE’s comments include:

- Factual and technical clarifications and corrections;
- Suggested language changes and comments on conservation and management actions, including measures presumed applicable to transmission infrastructure;
- Supplemental language and/or definitions in order to clarify meaning or intent; and,
- Additional examples and/or explanations.

Due to the sheer size of the document, it is unlikely that SCE captured every instance where language should be changed. To that end, SCE’s general comments and the specific edits implementing them are intended to provide examples of text that SCE believes should change. SCE respectfully requests the DRECP Committee incorporate these suggested changes, as well as make additional global changes for consistency throughout the DEIR/DEIS where appropriate.

## II. TRANSMISSION IS KEY TO ACHIEVING THE DRECP'S GOALS

Transmission of the renewable energy envisioned in the DRECP is of essential importance to the Plan's successful implementation. Similarly, key to the assumed benefits of the Development Focus Areas ("DFAs") is the ability to transmit the generated renewable energy to load centers for consumption.<sup>1</sup> SCE's ability to build new transmission infrastructure as well as maintain and upgrade its existing infrastructure is critical to supporting this objective. Further, the efficient processing of licensing applications supporting additional Transmission Projects is needed to fully appreciate the expected benefits of streamlined permitting from the DRECP.<sup>2</sup>

## III. CONSERVATION AND PERMITTING APPROACH

### A. SCE supports the Preferred Alternative as modified by the suggestions herein

SCE supports the DRECP's landscape level, holistic approach and regulatory framework for project permitting, approvals, and resource protection. The DRECP's fundamental objective of streamlining the permitting processes for the development of utility-scale renewable energy generation would be beneficial. SCE agrees with the DRECP that the current "project-by-project" approach (*i.e.*, the "No Action" alternative) puts an inefficient and continuous burden on regulatory agencies, local communities, resource conservationists and project proponents without providing either consistency or regulatory certainty for any of these stakeholders. SCE further agrees that among the alternatives considered, the Preferred Alternative is the best first step to achieve these goals.

### B. A description of anticipated NEPA/CEQA process in areas covered by DRECP is needed

The Preferred Alternative's programmatic approach potentially supports a consistent and streamlined project permitting process, particularly if all agencies responsible for permitting of energy development and transmission projects endorse an established set of mitigation, monitoring, and compensation measures. Under the National Environmental Protection Act (NEPA) and/or the California Environmental Quality Act (CEQA), the DRECP would be addressed like other multi-species habitat conservation programs; project applicants must take the DRECP's tenets into consideration as they plan for and develop projects within the DRECP area, and may rely upon the DRECP for take and/or habitat mitigation in support of their projects where applicable.

For example, as noted by SCE's comments # 1, 6, 8-10, 14, 116, 118, 121, 123, and 133 in

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<sup>1</sup> See DRECP at Glossary-5 (defining DFAs and noting that "Transmission projects are linear projects traversing DFAs and areas outside DFAs and are covered within and outside of DFAs.").

<sup>2</sup> See DRECP at I.1-1 ("The fundamental interagency goal of the DRECP is to provide a streamlined process for the development of utility-scale renewable energy generation and transmission consistent with federal and state renewable energy targets and policies, while simultaneously providing for the long-term conservation and management of Covered Species and natural communities as well as other physical, cultural, scenic and social resources within the Plan Area with durable and reliable regulatory assurances.").

Attachment 2, SCE suggests that the DRECP generally describe the DRECP's use within the CEQA/NEPA process, including but not limited to a description of how future CEQA/NEPA documents can tier from the DRECP to streamline the environmental review process and the expected timeframe from the DRECP Coordinating Group to complete their review.

**C. Prescribed setbacks and avoidance measures in Conservation and Management Actions (“CMAs”) are often overly conservative**

SCE concurs with the Covered Species identified in the DRECP and their value as appropriate indicator species of effective protection and conservation of native species and the habitat to support them. SCE has had favorable experiences with Habitat Conservation Plans and Natural Community Conservation Plans as a means of improving regulatory certainty while promoting regional conservation efforts.

However, several of the DRECP setbacks, avoidance and compensatory measures are more conservative than typically justified or required by resource agencies. Many of the CMA setbacks and measures are excessive (*e.g.*, riparian areas, special habitat types, species and avian avoidance, perch deterrents, structure designs, use of flight diverters, and avoidance of ridgelines) and may conflict with project siting and construction requirements.

SCE is providing specific comments about impacts, setbacks, avoidance and compensatory measures in Attachment 2, *see e.g.*, SCE comments # 29-81, 141, 145, 148, 154-167, 171-188, and 190-204, addressing this concern.

**D. An “equivalency determination” should be incorporated into DRECP’s conservation measures to accommodate unique site-specific conditions while still ensuring protection of biological resources**

The DRECP’s avoidance, setbacks and conservation measures are designed to ensure protection of resources and are important to advancing the DRECP’s goals. However, our experience with developing major infrastructure projects has helped demonstrate that flexibility can be incorporated into general mitigation measures to allow for site-specific conditions, actual resource needs, and project experience, while still ensuring the full protection of sensitive biological resources.

Consequently, SCE recommends the incorporation of an “equivalency determination” processes as one of the roles performed by the DRECP Coordinating Group to ensure that site- and project-specific issues can be fully addressed while simultaneously protecting biological resources. This equivalency determination would permit altering and/or replacing standard DRECP CMAs provided that such modifications continued to ensure equivalent protection of biological resources.

Our specific recommendation regarding this proposed equivalency determination is provided in SCE comments *see e.g.*, # 11, 109, 122, and 126 within Attachment 2.

**E. A variance process should be incorporated into the DRECP to accommodate projects that further the goals of the DRECP but may not be fully consistent with all of the DRECP's current land use designations**

SCE suggests a variance process be incorporated into the DRECP to accommodate projects that may be needed to meet the DRECP's goals but may not be fully consistent with certain DRECP land use plans or designations. To this end, SCE encourages the an additional role for the DRECP Coordinating Group to review variances for new projects, including Transmission Projects, and transmission line routes found to further the DRECP's fundamental goals but which may be inconsistent with certain DRECP land use designations. For example, such a variance process may be used in instances where transmission projects need to be partially sited in reserve or study areas.

Like the "equivalency determinations" described previously, SCE suggests the DRECP Coordinating Group review requested variances to ensure that site- and project-specific issues can be fully addressed while simultaneously protecting biological resources.

Our specific recommendation regarding this proposed variance process is provided in SCE comments *see e.g.*, #109, 127, and 134 within Attachment 2.

#### **IV. ENERGY PLANNING**

**A. The DRECP should be periodically refreshed to reflect changes in policy goals, technologies, demands for renewable power, and changing priorities of California's energy planning agencies**

SCE appreciates the work that has been done to date by the REAT and the DRECP Committee. In particular, SCE understands the challenge of forecasting the future of California's energy section in 2040. Given the evolving energy market and state goals, it is important for the DRECP to be periodically refreshed as policy goals change or new technologies become available. For example, proposals to change current renewable energy mandates and greenhouse gas ("GHG") reduction targets may impact the direction of future energy development. New technologies such as advanced energy storage and the continued electrification of the transportation sector can also affect future generation needs. Such updates are important to account for changing electricity demand as well as distributed and customer-side generation forecasts which may impact the potential need for renewable generation.

In light of these changes, SCE recognizes that the DRECP took a conservative approach in estimating the need for up to an additional 20,000 megawatts of renewable generation to support California's growth. As the DRECP is refreshed, SCE recommends that the DRECP Committee continue this conservative approach. This will provide the necessary flexibility to accommodate changes in renewable portfolio standards and/or the viability of certain renewable technologies which may drive increases in renewable energy demands. SCE believes the Transmission Technical Group's ("TTG") role as an ongoing advisory body to the DRECP Coordination Group and REAT as suggested in Section V.G will provide valuable insights in support of these DRECP updates.

While outside the immediate scope of the DRECP, SCE encourages on-going and active collaboration and communication regarding California's renewable energy goals and strategies between the State's energy planning agencies, *i.e.*, the California Public Utility Commission ("CPUC"), the CEC, the California Independent System Operator ("CAISO"), and the DRECP Coordinating Group. Specifically, the information in the DRECP should be used to inform the CEC's and CPUC's resource portfolio development under the Long Term Procurement Plan ("LTPP") process, which is then recommended for study in CAISO's Transmission Planning Process ("TPP"). For example, the CEC's currently designated Competitive Renewable Energy Zones ("CREZs") should be refined using the DRECP's DFAs. Similarly, when the DRECP is periodically refreshed, the information in the LTPP and TPP should be considered.

SCE's comments #114 and 135 in support of periodically refreshing the DRECP are provided in Attachment 2.

## V. TRANSMISSION PLANNING

### A. Attempts will be made to site new transmission projects within designated or existing transmission corridors and rights-of-way, but new rights-of-way will likely be required

A key issue that needs clarification is the concept that new transmission projects must be located with "designated utility corridors" or "existing rights-of-way or other similar language."<sup>3</sup> This language is problematic for two reasons. First, "utility corridor" is not a defined term and is not applied consistently throughout the document. Second, while SCE agrees that utilities attempt to place new transmission lines within existing ROWs or utility corridors, they cannot always do so for a variety of reasons such as available capacity in the existing ROW, reliability and redundancy concerns, location of substations/generators/load centers, changing demographics, topography and physical constraints, safety concerns, *etc.* Moreover, the DRECP should not pre-determine the location or routing of future Transmission Projects given that the new renewable generating facilities requiring inter-connection have not been sited at this time. As described in Section V.G below, additional studies focused on transmission planning are needed to provide meaningful information on potential transmission corridors in the DRECP.

The DRECP should also recognize the need to designate additional transmission corridors or expand existing corridors in coordination with regional planning efforts by the CAISO and the Western Electricity Coordinating Council ("WECC") and, as suggested in Section III.E above, should include a clear variance process. In particular, the discrete transmission elements identified by the TTG's conceptual planning effort should be taken into consideration in the CAISO's TPP. Deliberate recognition and use of the information developed in the DRECP's comprehensive approach to renewable energy development would facilitate achieving California's climate goals.

As stated earlier, the DRECP should include a clear variance process for instances when Transmission Projects need to be partially sited in reserve or study areas. SCE recognizes that additional review may be necessary in limited circumstances if a utility proposes a new

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<sup>3</sup> See *e.g.* DRECP at I.1-6 ("utility corridors"), I.2-5 ("transmission line corridor"), I.2-19 ("energy corridors") *etc.*

transmission project that is primarily located outside of a designated or existing corridor or right-of-way. In those cases, SCE recommends that the utility consult with the DRECP Coordination Group, as part of any preliminary consistency evaluation and/or variance proceeding (as suggested in Section III.E), to ensure that the new transmission project is consistent with the DRECP's goals. As suggested in Section V.G, SCE recommends that the REAT retain the TTG as a standing advisory group that would take the lead on transmission planning and advising the DRECP Coordination Group and REAT where new transmission line corridors are proposed and/or needed.

SCE suggests edits such as those described in comments # 23, 79, 90, 92, 127, 136, 144, 152, and 153 of Attachment 2 to make this clear.

### **B. No impact on operation and maintenance of existing Transmission Projects**

The DRECP and its three major planning components, the federal BLM *Land Use Plan Amendment* ("LUPA"), the *General Conservation Plan* ("GCP"), and the *Conceptual Plan-Wide Natural Community Conservation Plan* ("NCCP") recognize valid existing rights.<sup>4</sup> Thus the DRECP does not affect, in any way, the existence and/or customary use, operation, or maintenance of existing Transmission Projects or appurtenant rights-of-way. Such customary utility activities also necessarily include the use of mechanized vehicles, including helicopters and/or other aerial devices.

SCE includes specific comments about the operation and maintenance of existing facilities in comments *see e.g.*, # 12, 93-97, 101, 102, 150, and 151 of Attachment 2 so as to emphasize that the DRECP's measures and prescriptions do not affect valid existing rights and/or customary activities supporting existing Transmission Projects located within DRECP plan areas.

### **C. Procedures for the typical siting, permitting, and construction of new Transmission Projects should be described in the DRECP**

SCE suggests that the DRECP describe the generally applicable procedural efforts necessary to support the siting, permitting and construction of new Transmission Projects within the DRECP boundary. A description of this process will aid all stakeholders, including the DRECP Coordination Group, CEC, CPUC, renewable energy developers, and utilities servicing them, by establishing clear expectations for such development, including necessary coordination and time needed for permitting approvals.

SCE offers a description of these procedures for incorporation into the DRECP, including footnotes to relevant statutes and regulations, in comment # 14 of Attachment 2.

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<sup>4</sup> *See e.g.*, DRECP at I.3-2 ("The BLM land use plan and resource management plans, as amended, will recognize valid existing rights (e.g., mining claims)."), II.3-340 (allowing motorized vehicle use in wilderness if needed for valid existing rights), *etc.*; *see also* DRECP at Glossary-19 (defining "valid existing rights" as "[a] documented, legal right or interest in the land that allows a person or entity to use said land for a specific purpose. Such rights include fee title ownership, mineral rights, rights-of-way, easements, permits, licenses, etc. Such rights may have been reserved, acquired, leased, granted, permitted, or otherwise authorized over time").

**D. Coordination between renewable energy developers and utilities will be necessary to achieve benefits envisioned by the DRECP**

Given the length and linear nature of Transmission Projects supporting the DFAs, it is possible that: (1) both federal and state take authorizations may be required; and (2) the proposed Transmission Projects may be located both on and off BLM lands, necessitating coordination between the BLM and USFWS in support of any federal take authorization.<sup>5</sup> Coordination between applicants proposing to develop renewable energy projects in the DRECP with the utilities that transmit and distribute that electricity to consumers can facilitate the streamlining goals envisioned by the DRECP.<sup>6</sup>

SCE suggests the DRECP require developers proposing renewable energy projects to: (1) coordinate with the respective utility to identify the transmission infrastructure expected to be associated with the renewable energy project; and (2) include this information in the application submitted to the DRECP Coordination Group.<sup>7</sup> This coordination will help ensure that the transmission infrastructure will be fully analyzed in the relevant environmental reviews under the CEQA and NEPA. It will also help assure that the level of take required for the project includes the transmission infrastructure and allow the different take applications to be processed concurrently, so that one element of the proposed renewable energy project is not unnecessarily delayed by the processing of the take application of another element.

SCE suggests how this coordination may be encouraged through its incorporation into the procedures of the DRECP Coordination Group in comments # 14 and 121 of [Attachment 2](#).

**E. A certain amount of take should be set aside solely for transmission projects**

The take allocation approach endorsed by the DRECP assumes fixed amounts of take authorizations will be allocated geographically, within each planning component (*i.e.*, LUPA, GPA, NCCP) as appropriate, and to each permittee and/or applicant(s) as appropriate.<sup>8</sup> In contrast to this approach and apparently solely with respect to golden eagles, the DRECP also envisions a project-level cap for each region so as to ensure that no one project consumes all available golden eagle take within a given region. In either case, these “Plan-wide” take limits may not be exceeded.<sup>9</sup>

Consistent with and in addition to these principles, SCE respectfully suggests that the DRECP also set aside take amounts proportional to the needed energy transmission infrastructure in each ecoregion for all Covered Species (including the golden eagle) to be used only for energy

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<sup>5</sup> See DRECP at II.3-248 to 250 (describing federal take authorization procedures).

<sup>6</sup> See DRECP at II.3-225 to 231 (describing integrated project proposal submittal and review process)

<sup>7</sup> See DRECP at II.3-228 (project proposals may be submitted to DRECP Coordination Group for informal consistency review with the DRECP requirements)

<sup>8</sup> See DRECP at II.3-252 (describing assumptions regarding take allocation), II.3-253 (“Each DRECP component or permittee under a DRECP component will have an allocation ‘bank account’ at the ecoregion subarea level with an initial take allocation and the ability to withdraw additional take from the ecoregion subarea bank as needed until the bank account is empty”).

<sup>9</sup> DRECP at II.3-263.

Transmission Projects. Absent these reservations, the implementation of the DRECP risks stranding the new renewable energy assets if insufficient take is available for the supporting energy transmission facilities.

SCE suggests supporting text in comment # 128 of Attachment 2.

**F. The conceptual and unverified nature of the electric transmission resources and supporting the DFAs should be emphasized**

Transmission planning for the DEIR/DEIS was understandably at a broad, conceptual level given the limitations of available information. It is certain that electrical infrastructure upgrades and additions will be needed to safely and reliably integrate the proposed renewable energy generating facilities in the DFAs to the transmission grid and to transmit the energy to load centers. However, there is great uncertainty regarding the amount, timing, and specific locations of renewable energy development that will trigger such transmission system upgrades and construction.

To ensure all DRECP stakeholders and the public fully understand the preliminary nature of the transmission planning information described in the DRECP documents, the language in Appendix K (Transmission Technical Group Report) qualifying the conceptual nature of the described transmission resources supporting the DFAs should be emphasized and integrated within the body of the DEIR/DEIS. Specifically, it needs to be clear and should be repeated throughout the DEIR/DEIS and prominently restated in the Executive Summary and Volume II.3 Preferred Alternative that *the depiction of the locations for new transmission lines and land disturbance estimates are conceptual in nature*. This is important to ensuring that residents, community organizations, environmental groups, local cities and municipalities, energy developers, and other stakeholders are aware that transmission projects will not necessarily be located as depicted within Figure 6 or in the figures in Appendix K.

Accordingly, SCE suggests text edits such as those described in comments # 13, 104-106, 152-153, 205, 206, 209, 212 and 213 of Attachment 2. Such language should be integrated throughout the DRECP so as to effectively address this concern.

**G. Ongoing coordination between the DRECP Coordination Group, REAT, and TTG is warranted**

SCE strongly encourages the REAT to create a process for ongoing consultation by the DRECP Coordinating Group for utility corridors or rights-of-way and transmission routes as part of the implementation and periodic refreshing of the DRECP. Continued planning of new transmission lines and other electric infrastructure will be necessary as development occurs inside and outside the DFAs. SCE recommends the REAT establish the TTG as a standing advisory group that would take the lead on transmission planning and informing the DRECP Coordination Group and REAT as necessary. At a minimum, the TTG would also advise the DRECP Coordination Group regarding new transmission corridors, requested variances, and DRECP updates as described in Sections V.A, III.E and IV.A respectively. SCE appreciates the opportunity to have participated in the DRECP TTG and as a stakeholder in transmission planning is committed to continuing to contribute as a member of that group.

For example, SCE suggests text edits as described in comments # 13, 90, 92, 107, 152, 153, 189, 208, and 209 of Attachment 2 to further these aims.

## VI. LONG-TERM DRECP PLANNING

### A. Permits obtained under the DRECP supporting Transmission Facilities should be valid for the expected useful life of those facilities

Assuming the DRECP is finalized in 2015, the analysis and applicable term for the permits obtained under the DRECP would only be 25 years. While typical generation projects may be operational for approximately 20-25 years, transmission projects are likely to be in service for 75-100 years. As such, projects that obtain permits later in the DRECP's duration (2025-2040) would not have adequate take coverage, unless the permits are extended on a project-by-project basis.

Permits obtained under the DRECP should take into consideration operations and maintenance, including replacement, refurbishment, and expansion, of the transmission facilities and associated infrastructure over the project's full operating period, *i.e.*, 75 years or more. Means to access the Transmission Projects during their operating life are necessarily required in support of those activities.

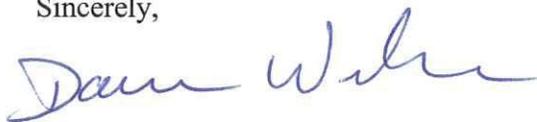
SCE suggests text in comments *see e.g.*, # 15, 16, 91, and 93 of Attachment 2 in support of this concept.

## VII. CONCLUSION

Again, SCE supports the DRECP's goal to provide a landscape-level approach to development of renewable energy and related electric transmission facilities. The Company appreciates this opportunity to provide its comments on this important effort.

Should you have any questions, please contact me directly or you may contact [Kathy.Yhip@sce.com](mailto:Kathy.Yhip@sce.com) or 626 302-1487 to set up a meeting with appropriate SCE personnel to discuss any of the comments contained herein.

Sincerely,



Dawn Wilson  
Director of Environmental Policy & Affairs

cc. Ian Forrest  
Roger Overstreet  
Kathy Yhip



January 23, 2013

Desert Renewable Energy Conservation Plan  
California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Attention: David Harlow  
Director  
Desert Renewable Energy Conservation Plan

Subject: Southern California Edison Company comments on Description and Comparative Evaluation of Draft DRECP Alternatives

To the Desert Renewable Energy Conservation Plan Team:

Southern California Edison (SCE) appreciates the opportunity to provide comments and recommendations on the Description and Comparative Evaluation of the Draft Desert Renewable Energy Conservation Plan (DRECP) Alternatives, released by the California Energy Commission (CEC) on December 17, 2012.

SCE provides these comments as recommendations for improvements on issues of importance to our utility operations consistent with our obligation to plan, permit, construct, own and operate transmission infrastructure to meet renewable energy and reliability needs in a safe, reliable, and cost-effective manner. SCE believes that transmission planning and effective conservation mitigation are two key elements for the DRECP's successful implementation. In addition to the specific comments attached to this letter, SCE has outlined the following key principles for successful mitigation and transmission planning based on our own experiences operating under Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs). SCE offers these principles as recommendations for inclusion in the DRECP:

**Key Principles for Successful Conservation & Development Outcomes in HCP/MSHCP/NCCPs:**

SCE believes that the DRECP will, when complete, provide the regulatory framework necessary to support investment in renewable energy resources and associated electrical transmission facilities, while ensuring effective protection and conservation of native wildlife and plant species and the natural communities that support them. SCE has had favorable experiences with HCP/MSHCP/NCCP models, including reducing the amount of time to secure necessary "take" permits (from years to months), providing cost certainty (pre-determined mitigation fee schedule), reducing the risk of litigation (plan consistency versus individual projects), and providing regional benefits to conservation efforts.

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Drawing from these experiences, SCE offers the following key principles for consideration in the development of the DRECP:

- The DRECP should be practical and accessible to stakeholders in order to facilitate a clear understanding of the responsibilities entailed with participation in the plan. SCE has found that successful planning occurs when agencies and stakeholders attain mutual understanding of each party's interests. This understanding can be facilitated by denoting stakeholder roles, establishing rules of engagement, and identifying measures of success and clear timelines for stakeholder involvement throughout the duration of the plan.
- The DRECP administrative system to implement the plan should be designed for efficient centralized processing, review, and approval of projects while addressing local and regional resource and planning concerns.
- The DRECP should address clear conservation purposes and include elements of a mitigation program that are transparent, systematic, and based on sound science. A program designed in this way will provide certainty to developers about the requirements and costs of mitigation, and assurances to the conservation community that conservation priorities can be maintained as needed.
- The DRECP should ensure durable conservation through land designation, management, and funding:
  - Conservation lands should be protected from future administrative decisions that undo or undermine their designation. Conservation should have a level of durability equal to the level of impact for which it is being used to mitigate.
  - Conservation lands should be administered by agencies that possess the authority and responsibility to monitor and manage threats that may impact the baseline of target conditions of protected species and habitats.
  - Agencies should be assured adequate funding for conservation management as required in the final DRECP so as to meet biological goals and objectives for natural communities and covered species.
- Fee structure should be fair and commensurate:
  - Fees associated with the plan should be commensurate with project specific impacts to covered species and their habitats (i.e. greater impacts result in higher mitigation costs), rather than proportional to total project cost. A mitigation program based on environmental disturbance would encourage developers to avoid and minimize their impacts to species and habitats whenever possible, thus, advancing conservation goals and objectives and reducing project costs. Moreover, such a fee structure may also expedite projects by incentivizing development on previously disturbed lands that typically face less opposition from stakeholders than biologically/culturally sensitive lands.
- Mitigation measures for Biological Goals & Objectives should be clearly defined so that stakeholders have an understanding of what measures must take place

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and how those measures will be implemented to effectively accomplish DRECP objectives. Mitigation measures to be implemented for covered activities under the plan must be reasonable and feasible in order to allow for the timely and cost effective construction of projects while providing an appropriate level of protection for covered resources. Creating consistent methods for determining the required mitigation up front when developers are planning their projects will lead to more timely permitting and better designed projects while avoiding duplicative mitigation requirements.

### **Key Principles for Transmission Planning:**

Electrical infrastructure upgrades and additions will be needed to safely and reliably interconnect renewable energy resources from designated Development Focused Areas (DFAs) to population centers.

Integrating land use into the DRECP planning efforts will provide greater certainty, resulting in a more orderly, rational, timely, and cost-effective state and regional transmission planning and permitting process. Coordination of state and regional planning efforts of the California Independent System Operator (CAISO), California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and the Western Electricity Coordinating Council (WECC), including broad stakeholder participation, are essential to achieving the state's goals. The TTG has made tremendous progress in initiating these efforts, but they must be strengthened and carried forward throughout the DRECP process.

SCE recommends that the DRECP use the following transmission principles for planning and implementation purposes:

- **Facilitate Cost-Effective, Environmentally Sound Transmission Planning, Siting, and Permitting:** The DRECP should facilitate cost-effective, environmentally sound transmission planning, siting, and permitting. The DRECP should recognize the need for sufficient future transmission system upgrades and additions to integrate renewable energy resources. Moreover, the DRECP should acknowledge the need to designate additional transmission corridors or expand existing corridors in coordination with regional planning efforts by WECC and others, and should take into consideration the cumulative impact to the electrical grid of multiple downstream transmission infrastructure changes to accommodate new renewable generation projects. The DRECP should recognize the need for utilities to acquire sufficient lands to support transmission corridors, upgrades and additions, and to hold such lands for future use consistent with the DRECP planning horizon.
- **Provide flexibility in the Reserve Design to facilitate transmission corridors, upgrades and additions in the most cost-effective, environmentally sound manner.**

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- Identify potential transmission system upgrades and additions, including collector substations, network upgrades, downstream upgrades, interconnections, corridors, and related infrastructure (such as roads), sufficient to support renewable energy development in the DFAs and to maintain a reliable and safe electrical system.

Proximity of a renewable generator to existing transmission lines does not guarantee available capacity on those lines for electricity. For instance, transmission lines located in proximity to DFAs may not necessarily have sufficient capacity to accommodate the anticipated renewable generation in the DFAs.

- Encourage the use of existing roads, transmission rights-of-way, and corridors, wherever possible, consistent with all applicable reliability planning criteria required by the North American Electricity Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), and the California Independent System Operator (CAISO).
- Analyze potential transmission upgrades, additions, new or expanded corridors, and related infrastructure in sufficient detail so as to facilitate timely permitting by local, state, and federal entities when the transmission facilities are actually proposed to be developed.
- Coordinate with the CAISO's Transmission Planning Process (TPP) to ensure that transmission upgrades and additions needed to support renewable energy development in areas identified by DRECP are considered for inclusion as "policy driven projects".
- Coordinate with the WECC regional transmission planning efforts to ensure consistency and compatibility across the western region of North America. Coordination of state and regional planning efforts could lead to a fully integrated west-wide transmission system, taking advantage of generating characteristics of both variable and flexible generation to lower costs, increase reliability, and to facilitate "system balancing" across broad geographic regions to "smooth out" the variability of renewable energy resources.

DRECP should pay particular attention to transmission corridors, upgrades and additions that may be needed to safely and reliably integrate renewable energy resources, both imported and exported, in to the electrical grid consistent with the DRECP planning horizon.

- Coordinate with long term, comprehensive energy and environmental planning efforts, including the CPUC Long Term Procurement Plan (LTPP) and the BLM Solar PEIS to direct development to high renewable resource value, low conflict areas.

In addition to these planning principles, the SCE Transmission Technical Group leads have also included specific technical issues and suggestions referring to limitations of

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the transmission planning metrics and findings in the TTG Conceptual Transmission Plan, which can be found in the attached comments page.

Thank you for the opportunity to provide comments and suggestions to the DRECP. Please find attached specific comments keyed to the Draft DRECP Alternatives by chapter, section, and page. SCE looks forward to working with you to ensure that the DRECP facilitates cost-effective, environmentally sound transmission planning, siting, and permitting.

Sincerely,

A handwritten signature in black ink that reads "Roger Overstreet".

Roger Overstreet

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Monrovia, CA 91016

**Description & Comparative Evaluation of Draft DRECP Alternatives  
Comment Form**

**Comments submitted by:**  
**Contact information:**

**Southern California Edison  
Roger Overstreet  
roger.overstreet@sce.com  
1218 S. Fifth Avenue, Monrovia CA, 91016**

Commenter (Your Name)	Comment #	Comment Location:				Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph (from top)	
Southern California Edison	SCE- 01	1	2	23		<p>Additional language from the Appendix A TTG report needs to be inserted here that reminds the reader that the TTG analysis is not a siting exercise and was just meant to approximate the affected acreage necessary for the transmission requirements for each DFA Alternative. Right now, the Transmission Planning Goals and Assumptions section reads like a RETI style exercise that will likely be interpreted as: The DRECP TTG said we need these specific lines in these specific locations.</p> <p>Such caveat language is located in the following places in the Appendix A TTG Report:</p> <p>P. iii, second paragraph</p> <p>This is a conceptual transmission plan for the alternatives and is not intended to be a siting exercise. Thus, the line segments represent only the electrical connections (i.e., the end-points of line segments) and do not reflect specific siting plans or routes. However, the Garamendi principles were used when constructing these maps and thus the lines were drawn to follow existing rights-of-way wherever possible. The new transmission lines identified through this exercise have not been evaluated for their specific locations, constructability, desirability, cost, or likelihood of their successful permitting. They also have not been studied by transmission planning groups to identify reliability concerns or effects on other transmission systems.</p> <p>P. 9, first paragraph:</p> <p>The TTG was convened to identify a conceptual transmission plan and how much land could be needed to accommodate potential transmission elements in the plan. However, the TTG did not conduct a transmission siting evaluation which would normally include power flow studies and stability studies, and economic analysis to compare new transmission with “non-wires alternatives” that support the development of renewable resources at different locations. The conceptual transmission plans and associated acres of impact reported in this document are based on the professional judgment of experienced transmission planners representing major utilities across the state.</p> <p>P.19 second paragraph:</p> <p>As noted above, the purpose of the DRECP TTG exercise is to identify a conceptual transmission plan and</p>

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<p>its associated land impacts. The TTG is not conducting a comprehensive siting evaluation, so the transmission lines shown on Figures 1 through 6 should be considered as conceptual only. Due to the complexity of the information presented in the figures, no existing lines are shown, but the conceptual lines follow existing ROWs or designated utility corridors where possible.</p>	<p>For helicopter construction, the sentence reading:  <i>“The use of helicopters to install transmission lines could reduce the need for access roads but such a site-specific analysis was beyond the scope of the TTG effort.”</i>                  should be changed to:  <i>“The use of helicopters to install transmission lines may reduce the need for access roads in certain situations but such a site-specific analysis was beyond the scope of the TTG effort.”</i></p>	<p>Regarding transmission lines, the use of paint on towers and support facilities is mentioned. SCE has determined that the use of paint is not a viable alternative due to the need to repaint towers on a regular basis and the associated negative environmental impacts due to the presence of the deteriorating paint and the work involved to repaint a tower.</p>	<p>Objective GOEA2.2: Decrease relative to existing conditions mortality risks associated with flight strike hazards including: unmarked transmission lines, unmarked guy-wires, and wind turbines.                   Southern California Edison has been working with the U.S. Fish and Wildlife Service on transmission line impacts on golden eagles, background research and information provided by the Service shows that transmission lines do not present a collision hazard for golden eagles therefore marking of lines is not warranted unless there are special environmental conditions (e.g. crossing a large water body) that need to be addressed.</p>	<p>Comments below to be added in the following two sections of the report:                  (1) Under Chapter 1, Section 2 and Page 25 at the end of the last paragraph,</p>	<p>(2) Under Section 3. Assumptions for Conceptual Transmission Analysis to Support Renewable Resource Development within DFAs prior to Sub-section 3.1 on Page 9 of the Appendix A Transmission Technical Group (TTG) Report:                   Due to limited resources and time constraints, the TTG team opted for a simplified spreadsheet analysis in developing the “2040 Conceptual Transmission Plan” for five DRECP Alternatives. This analysis resulted in a “conceptual set” of transmission and substation components for each DRECP Alternative based on generically sized transmission line and substation components that would be needed to collect renewable resources from DFAs and deliver those resources to load centers. This approach helped the TTG team to assess and determine the land impacts of the conceptually planned transmission and substation infrastructure to support the primary objective of the land conservation efforts within the DRECP map boundary.                   The approach, although correct in a conceptual sense, is not the result of an in-depth transmission planning exercise which usually requires a detailed technical analysis involving the power flow, stability and short circuit programs along with ensuring and adhering to transmission reliability standards in order to develop a logical, accurate, reliable and tangible transmission system of lines, and substations to interconnect new generators. Detailed studies also examine the economics of the planned components, potential alternates, and account for additional critical power system performance parameters.                   The TTG recognizes that there are key limitations related to transmission planning metrics and findings for</p>
<p>Southern California Edison</p>	<p>SCE-02</p>	<p>1 2 25 1</p>	<p>4 4 21</p>	<p>App. K 12</p>	
<p>Southern California Edison</p>	<p>SCE-03</p>				
<p>Southern California Edison</p>	<p>SCE-04</p>				
<p>Southern California Edison</p>	<p>SCE-05</p>	<p>1 and 2 25 and 9</p>	<p>App. A 3</p>		

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<p>the California transmission grid network over the 2020 – 2040 time periods that have not been considered or assessed in the TTG Conceptual Transmission Plan. In the absence of in-depth technical studies utilized in transmission planning the following specific issues have not been considered:</p>	<ol style="list-style-type: none"> <li>1. Interaction impact of DFAs’ new renewable generation with major California transmission Paths’ transfer capabilities</li> <li>2. Accounting of the expected system load growth, new thermal and other generation resources and their locations, and new unknown long term transmission upgrades for reliability considerations leading to 2040 by utilities and CAISO</li> <li>3. Testing of transmission contingencies and constraints within California</li> <li>4. Retirement of In-Basin Generation in California under proposed State Water Resources Control Board’s Once-Through Cooling (OTC) policy by 2020 and replacement generation and its locations</li> <li>5. Detailed assessment of routing and optimal use of the existing transmission corridors and rights-of-ways in developing the most suitable locations of the conceptual delivery lines’ origination and termination substations</li> <li>6. Separation requirements that may be needed to ensure the grid is protected from severe contingencies caused by multiple adjacent circuits</li> </ol>						<p>Southern California Edison SCE-06</p>
	<p>The following statement needs to be inserted prior to the last sentence of the second paragraph: “However, it must be noted that the growth of load at various load centers in California by 2040 and its eventual service by the planned delivery lines included in the “DRECP Conceptual Transmission Plan” for the DFAs’ renewable resources MWs has not been assessed and evaluated for the unknown amount and locations of new generation resources, new transmission upgrades, and unknown load growth trajectory at various California locations outside of the DRECP plan area between 2020 and 2040 due to resource and time constraints and lack of detailed technical studies by the TTG team. This critical missing data may potentially result in a different set of termination locations of the delivery lines to various load centers in California which has not been determined in the TTG study.”</p>						

**ATTACHMENT 2**  
**SCE's Detailed Comments**

Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
1	Executive Summary	Executive Summary	2.3	Development Focus Areas and Transmission	P-17	Leading Paragraph under Section 2.3	<p>The DRECP would create Development Focus Areas where renewable energy would be streamlined for approval. Transmission would be streamlined both within and outside Development Focus Areas. However, since the intent of the DRECP is to access renewable energy from DFAs and deliver it to various urban consumption centers in California safely and reliably, this needs further clarification that the streamlining of the required transmission facilities should not stop at the DRECP boundary, but should continue to the consumption centers with a distinct declaration that the permitting for delivery transmission lines will also be streamlined by agencies to successfully achieve the DRECP renewable energy goal of an additional 20,000 MW by 2040 in California. Transmission lines are required to deliver new renewable generation to the consumer and, as such, these linear projects extend beyond the DRECP boundary. While the DRECP only covers activities within the DRECP boundary, SCE recommends that the USFWS and CDFW commit to applying the same conservation measures and approach for transmission projects located partially inside and outside the DRECP to ensure a consistent and streamlined approach. The only exception would be if the USFWS or CDFW affirmatively determines that it is necessary to apply a different conservation strategy to the portion of the transmission project located outside of the DRECP for the protection of listed species - something that SCE expects to rarely be required.</p>
2	Executive Summary	Executive Summary	4.1	California Environmental Quality Act and National Environmental Policy Act Compliance	47	Environmental Effects Outside of the Plan Area	<p>Plan implementation would create effects outside of the Plan Area for two reasons. First, transmission facilities would have to be constructed or upgraded between the renewable generation facility locations and the areas with the highest electricity demand. The regions outside of the Plan Area that could be traversed by potential new transmission lines are in central and coastal San Diego, Riverside, and Los Angeles counties, as well as in the San Joaquin Valley. The second type of impact occurring outside of the Plan Area results from the differences between the BLM's California Desert Conservation Area Plan boundary and the Plan Area boundary. The LUPA would result in planning changes outside the Plan Area but within the California Desert Conservation Area Plan boundaries because the California Desert Conservation Area Plan extends outside of the Plan Area. The effects of both</p> <p>1. The language fails to mention substation facilities which are likely to be required. As noted in comment 4 below, SCE proposes modifying the definition of "transmission project" and including, among other infrastructure, substation facilities. The modified definition would be applied to "transmission facilities" and similar language throughout.</p> <p>2. San Bernardino County is not listed as one of the regions where new transmission lines will likely be needed. Please add San Bernardino County.</p>

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
							transmission and LUPA components outside of the Plan Area are analyzed in the EIR/EIS.	
3	Executive Summary	Executive Summary	Table 2.	DRECP Covered Activities (Cont'd)	P-17	Type - Pre-Construction and Construction Activities (Cont'd)	Under Activity column, it states "Transmission collector lines"	Suggest rewording to read <ul style="list-style-type: none"> <li>• "Transmission collector lines <b>and substations</b>" or</li> <li>• "Transmission <b>Projects</b>" <b>to include transmission and associated infrastructure.</b>" Please see comment 4</li> </ul>
4	Glossary	Glossary			Glossary -18	Glossary of terms	transmission project. Covered Activities that involve the construction, operation, and maintenance of a transmission line, including step-up transformers, towers, and substations, but generally consisting of a linear type of disturbance	The DRECP makes numerous references to "transmission project," "transmission," "transmission lines," "transmission facilities" and other similar language without expressly describing the transmission-related infrastructure that would likely also be associated with the transmission development, such as substations, distribution facilities, access roads, etc. The proposed definition below describes the broader suite of components that could constitute a "transmission project." In addition, the proposed change to the definition clarifies that a transmission project can deliver electricity from both Covered Activities and non-Covered Activities. Given the interconnected nature of the electrical grid, transmission infrastructure must provide a range of services and cannot be solely dedicated to particular generation types. Any other approach to transmission planning and operation may lead to the duplicative transmission infrastructure to specifically service non "Covered Activities" and would potentially defeat or undercut the biological resource conservation goals of the DRECP. Proposed revision: "transmission project. Covered Activities that involve the construction, <b>modification</b> , operation, <b>and-or</b> maintenance of a transmission <del>line</del> <b>infrastructure and related facilities within the DRECP. The definition of "transmission project"</b> also applies to references in the DRECP to "transmission," "transmission lines," "transmission facilities" or similar language. <b>Transmission Projects include but are not limited to any facility used for the provision, storage, transmission, distribution, or transportation of electricity or natural gas, including but not limited to step-up transformers, towers, substations, substation-related facilities, electric and gas transmission and distribution facilities, telecommunications facilities, access roads, and appurtenant equipment owned and/or used by a utility company but that generally, but not necessarily, consisting of a linear type of disturbance. Transmission projects directly or indirectly support the delivery of electricity from Covered Activities but may also support the delivery of electricity from sources not considered Covered Activities."</b>

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
5	Volume I	DRECP Program Development	5	Develop Conservation and Management Actions	19	na	Project proponents will be able to fulfill most or all compensation requirements by payment of an implementation fee	SCE strongly supports this approach for compensation since it facilitates additive compensation that can be used to address most vulnerable species/habitat and is more sustainable over time
6	Volume I	Exec Summary Planning Process	2.3 1.3.5.7	Development Focus Areas & Transmission Planning Process	17 1.3-58	na	"A programmatic environmental analysis that may simplify project-specific environmental reviews."  "Planning for transmission within the DRECP and between the DRECP and load centers requires building upon previous transmission planning efforts."	The EIR/EIS should clearly describe how the programmatic EA will simplify the environmental reviews since the DEIR/DEIS does not include specific analysis of siting or routing of transmission lines. SCE agrees with second statement and strongly encourages the REAT to establish the TTG as a standing support group for the DCG. Additional study and planning will be needed to site and route transmission lines, substations, and other infrastructure (see "Transmission Project") needed to support new renewable generation.
7	Volume I.0	Background and Planning Process	I.0.3	Plan Area	I.0.3.1	na	na	Will the Apple Valley MSHCP area be excluded from the DRECP (as CVMSHCP has) if it is approved before the FEIR/FEIS is issued? It would be preferable to have a single MSHCP and avoid overlapping HCPs because of the potential for inconsistency and confusion.
8	Volume I.2	Background and Planning Process	I.1.2.1.2	Federal Endangered Species Act	I.1-4	Paragraph 1	"...The BLM will use the DRECP as a basis for consultation with the U.S. Fish and Wildlife Service (USFWS)..."	Will the BLM conduct Section 7 consultation with USFWS on a project-by-project basis to obtain project specific take authorization or will take authorization be granted through a DRECP administrative process? SCE encourages the REAT to establish a DRECP administrative process for take authorization that will address both USFWS and CDFW needs for Covered Activities, particularly within the DRECP boundary. This will provide better regulatory certainty, minimize duplicative and potentially inconsistent requirements, and ensure conservation and protection while at the same time providing a more efficient, streamlined permitting process. Consistent with the DRECP's landscape planning approach, SCE recommends the BLM rely on the DRECP's measures for covered species and only consult with USFWS for the those aspects of a project that are outside the programmatic EA.
9	Volume I.2	Background and Planning Process	I.1.3	US Fish and Wildlife Service Purpose and Need	I.1-6	Paragraph 1	"...The USFWS's proposed action is to consider the issuance of Section 10(a)(1)(B) permits under the federal ESA for the incidental take of Covered Species on <b>nonfederal lands</b> ..."	Will the BLM conduct Section 7 consultation with USFWS on a project-by-project basis to obtain project specific take authorization on federal lands or will take authorization be granted through a DRECP administrative process? As stated in comments 8 and 10, SCE encourages the REAT to establish a DRECP administrative process for take authorization that will address both USFWS and CDFW needs for Covered Activities, particularly within the DRECP boundary. This will provide better regulatory certainty, minimize duplicative and potentially inconsistent requirements, and ensure conservation and protection while at the same time providing a more efficient, streamlined permitting process.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
10	Volume I.2	Background and Planning Process	I.1.4.2.1	California Department of Fish and Wildlife Roles and Responsibilities	I.1-12	Paragraph 2	"...While a renewable energy project proponent may seek a permit from CDFW under the NCCP for activities on federal public lands, all such activities on federal public lands must not conflict with federal law."	Will project proponents apply directly to CDFW for an incidental take permit or will there be a DRECP administrative organization that will be responsible for issuing take agreements? As stated in comments 8 and 9, SCE encourages the DRECP Committee to establish an administrative process for take authorization that will address both USFWS and CDFW needs for Covered Activities, particularly within the DRECP boundary. This will provide better regulatory certainty, minimize duplicative and potentially inconsistent requirements, and ensure conservation and protection while at the same time providing a more efficient, streamlined permitting process.
11	Volume I.3	Background and Planning Process	1.3.4.5	Develop Conservation and Management Actions	1.3-29	na	Add new section describing "equivalency determination"	SCE recommends the incorporation of an "equivalency determination" processes into the DRECP through the Coordinating Group to ensure that site- and project-specific issues can be fully addressed while simultaneously protecting biological resources. This equivalency determination would permit altering and/or replacing standard DRECP CMAs provided that such modifications continued to ensure equivalent protection of biological resources. Suggested insertion: <b>"Upon review, the DRECP Coordination Group and/or take permitting agency may determine that certain CMAs are infeasible, impractical, or otherwise unwarranted. In those circumstances, the DRECP Coordination Group may recommend, and/or the take permitting agency may agree, to delete those CMAs and substitute for them other measures that the permitting agency finds are equivalent or more effective in mitigating the impacts of the project."</b>
12	Volume I.3	Background and Planning Process	1.3.5.7	Transmission Planning Goals and Assumptions	1.3-58	na	Insert new paragraph in Section 1.3.5.7 recognizing activities needed to support existing utility facilities	The DRECP should be revised as necessary to make clear that its prescriptions do not affect customary activities supporting existing utility facilities located within DRECP plan areas. New paragraph affirming Transmission Planning for DRECP assumed ability to maintain current electric transmission and distribution facilities: <b>Section 1.3.5.7 "DRECP and its three major planning components, the federal BLM Land Use Plan Amendment ("LUPA"), the General Conservation Plan ("GCP"), and the Conceptual Plan-Wide Natural Community Conservation Plan ("NCCP"), recognize valid existing rights. Transmission planning in support of the DRECP assumed that the Plan does not affect, in any way, the existence and/or customary use, operation, or maintenance of existing utility facilities or appurtenant rights-of-way. Such customary utility activities also necessarily include the use of mechanized vehicles, including helicopters and/or other aerial devices."</b>

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
13	Volume L3	Background and Planning Process	I.3.5.7	Transmission Planning Goals and Assumptions	I.3-58-60	na	na	The estimate of land disturbance based on the TTG's efforts should be viewed as a very rough estimate and should not be used as the basis for establishing limits on disturbed acreage for transmission lines. Additional, more detailed transmission planning studies are needed.
14	Volume 1.3	Background and Planning Process	1.3.5.7	Transmission Planning Goals and Assumptions	1.3-58 to 60	na	Insert new paragraph in Section 1.3.5.7 clarifying transmission project process in support of Covered Activities. Alternatively, this section may be included as an appendix within the DRECP.	<p><b><u>"1.3.5.7.1 Anticipated Procedural Efforts To Be Taken In Support Of The Siting, Permitting, And Construction Of New Utility Facilities"</u></b></p> <p>Transmission planning assumed the DRECP to be applicable to "Covered Activities" occurring within the DRECP, including "transmission." While the referenced covered DRECP "transmission" would necessarily support, in some way, a "Covered Activity," the covered transmission infrastructure need not be constructed solely in support of the "Covered Activities."</p> <p>Generally, there are two anticipated ways in which new utility facilities for transmission will be proposed, permitted, and constructed in support of renewable energy projects proposed within areas addressed by the DRECP: (1) Utility facilities undertaken as "connected actions" under the National Environmental Policy Act (NEPA) or part of the "whole of the action" under the California Environmental Quality Act (CEQA), i.e., utility facilities included as necessary and/or reasonably foreseeable components of environmental documents supporting proposed power generation projects within areas of the DRECP; or (2) California Public Utility Commission (CPUC) jurisdictional actions, i.e., utility facilities constructed as the subject of a utility's proponent's environmental assessments ("PEAs") and applications for Permits to Construct (PTCs) and Certificates of Public Convenience and Necessity (CPCNs) filed at the CPUC. (See CPUC General Order ("GO") 131-D). These application and entitlement scenarios are described in greater detail below:</p> <p><b><i>1.3.5.7.1.1 Utility facilities undertaken as "connected actions" under the NEPA or part of the "whole of the action" under the CEQA.</i></b></p> <p>Utility facilities required in support of proposed renewable energy projects within the DRECP should typically be captured as part of the underlying renewable energy project's scope. This is consistent with the mandates that proposed projects consider the "whole of the action" under CEQA and all "connected actions" under NEPA. (See CEQA Guidelines §§ 15003(h) (requiring consideration of "whole of the action"), 15378(a) (defining "Project" to include "whole of an action"); 40 C.F.R. 1508.25(a)(scope of proposed action including "connected actions"))."</p>

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							<p><b>I.3.5.7.1.1.1 <i>Needed utility facilities would be described in the underlying CEQA and/or NEPA document</i></b>  For example, for a proposed renewable energy project in the DRECP plan area under the jurisdiction of the California Energy Commission (“CEC”) or local permitting authority as lead agency, all necessary utility facilities, upgrades, and activities in support of the renewable energy project would be described in the project’s underlying CEQA and/or NEPA document. (See Cal. Pub. Res. Code § 25500, et seq.). That document would:</p> <ul style="list-style-type: none"> <li>• Include the full description of any needed utility facilities, including any necessary transmission lines, system upgrades, needed telecommunications and/or fiber optic cable routes, etc. to the extent they are not speculative;</li> <li>• Include a full and complete environmental analysis of the utility facilities and scope of work, including but not limited to the acquisition of any real property required for the project;</li> <li>• Describe with particularity the anticipated environmental impacts expected to result from the utility facilities, distinct from the renewable energy project as a whole. For example, if the utility facilities alone are expected to result in no significant, unavoidable environmental impacts, the underlying CEQA/NEPA document should affirmatively and explicitly state as much. If the utility facilities are expected to result in significant impacts, the project’s CEQA/NEPA document should specifically enumerate which transmission utility facility impacts were found to be significant and unavoidable despite the implementation of mitigation; and</li> <li>• Specifically identify any mitigation measures (and/or applicant proposed measures (APMs)) and permits which the underlying CEQA/NEPA document presumes to be applicable to the utility facilities and scope of work.</li> </ul> <p>It is advised that the renewable energy project’s sponsor and lead agency(ies) consult with all relevant utilities regarding any mitigation measures required by the project environmental document ahead of time so as to ensure their feasibility and efficient implementation.</p> <p><b>I.3.5.7.1.1.2 <i>The complexity and time required for CPUC licensing of utility facilities captured within the underlying CEQA and/or NEPA document depend on the character of the utility facilities and their likely environmental impacts</i></b>  Once the renewable energy project is approved by the lead agency(ies), the supporting electric utility would then seek a license, if necessary, for the construction of utility facilities</p>

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							<p>under the jurisdiction of the CPUC. Whether or not such electric utilities would be required to file a license with the CPUC in support of the renewable energy project would depend on: (1) the character of the utility facilities proposed; and (2) the conclusions of the renewable energy project's EIR and/or EIS regarding those utility facilities. Generally, if the proposed project required "major electric transmission line facilities...at 200 kV or more," the electric utility would be required to apply for a CPCN in support of the construction of such utility facilities. The electric utility would likely use the approved renewable energy project EIR and/or EIS in lieu of a PEA in support of its CPCN application. (See GO 131-D(III)(A), GO 131-D(IX)(A)(1)(h)).</p> <p>If the proposed renewable energy project required "power line facilities or substations...between 50 kV or 200 kV or new or upgraded substations with high side voltage exceeding 50 kV" then a PTC may be required. If significant unavoidable environmental impacts are expected as the result of the construction of the transmission lines and/or substation facilities, then an application for a PTC would likely be required. As in the case of the CPCN, the electric utility would likely use the approved renewable energy project's EIR and/or EIS in lieu of a PEA in support of that PTC application. (See GO 131-D(III)(B)).</p> <p>In contrast, a PTC may not be required for such facilities if the transmission lines and substation have undergone environmental review and there are no significant unavoidable environmental impacts caused by their construction and/or operation. In such cases, no application would be filed but the electric utility would still provide notice regarding the construction of the required utility facilities. (See GO 131-D(III)(B), GO 131-D(XI))</p> <p>If the proposed utility facilities do not require a CPCN or PTC as described in G.O. 131-D, typically no further discretionary permits would be required for the project. The electric utility would however, communicate with and obtain the input of local authorities regarding land use matters and obtain any non-discretionary permits. (See GO 131-D(III)(C)).</p> <p>In any of the scenarios described above, the electric utility should endeavor to work with the CPUC to facilitate the approval of such proposed projects within 180 days. (See Ca. Gov't Code § 65952).</p> <p><b>I.3.5.7.1.2 CPUC jurisdictional facilities</b>  <b>If additional utility facilities are needed but are not part of any specific underlying renewable energy project, then such</b></p>

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								<p>utility facilities and appurtenant rights-of-way may be the subject of the utility's independent PTC or CPCN application filed with the CPUC. Under this scenario, the need for the project will have been independently identified by the electric utility, or potentially the California Independent System Operator ("CAISO"). The electric utility's application to construct a project to address this identified need will be supported by, among other things, the renewable energy project applicant's PEA, which is used to aid the CPUC in its development of documents in compliance with CEQA and/or NEPA. (See California Public Utilities Commission website, Transmission Siting and Environmental Permitting, available at <a href="http://www.cpuc.ca.gov/PUC/energy/Environment/">http://www.cpuc.ca.gov/PUC/energy/Environment/</a> (last checked Feb. 2, 2015) (referencing "CPUC guidance on the Permitting Process" including "General Guidance for Filing a CPCN/PTC application with the CPUC Docket Office," "General Information on Permitting Electric Transmission Projects," "Certificate of Public Convenience and Necessity (CPCN) Process: A Step-by-Step Guide," and "Overview of Electric Transmission Siting at the California Public Utilities Commission").</p> <p>The electric utility should endeavor to work with the CPUC to facilitate the approval of such proposed projects in a timely fashion, but the planning, permitting and construction of such facilities can take several years to complete. (See California Public Utilities Commission presentation, Processes for Planning and Permitting electric Transmission Projects in California (Oct. 2011), available at <a href="http://www.cpuc.ca.gov/NR/rdonlyres/6D4D8AA9-CF49-4194-A4C6-DF394317EA6B/0/CPUCSidesFresnoAssmbyComTransmis sionOct242011.pdf">http://www.cpuc.ca.gov/NR/rdonlyres/6D4D8AA9-CF49-4194-A4C6-DF394317EA6B/0/CPUCSidesFresnoAssmbyComTransmis sionOct242011.pdf</a> (last checked Feb. 2, 2015))."</p>
15	Volume I.3	Background and Planning Process	I.3.7.2	Endangered Species Act Incidental Take Permit Duration	I.3-64	na	"The proposed term for any Section 10(a)(1)(B) incidental take permits issued under the GCP component of the DRECP would extend through 2040."	<p>The duration of permits for transmission projects covered under the DRECP should be increased to 75 to 100 years. Assuming the Plan is finalized in 2015, the analysis and applicable term for the permits is only 25 years. Generation projects may be operated for 25+ years, while transmission projects are likely to be in service for 75-100 years. Transmission projects, and especially those that obtain permits later in the period currently covered in the Plan (2025-2040), would not have adequate coverage for operations and maintenance, unless the permits are extended on a project-by-project basis</p>

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16	Volume I.3	Background and Planning Process	I.3.7.3	Natural Community Conservation Plan Duration	I.3-64	na	"The NCCP portion of the DRECP would be effective through 2040. CDFW and, where it has jurisdiction, CEC would be able to issue incidental take authorization throughout the term of the NCCP."	The duration of permits for transmission projects covered under the DRECP should be increased to 75 to 100 years. Assuming the Plan is finalized in 2015, the analysis and applicable term for the permits is only 25 years. Generation projects may be operated for 25+ years, while transmission projects are likely to be in service for 75-100 years. Transmission projects, and especially those that obtain permits later in the period currently covered in the Plan (2025-2040), would not have adequate coverage for operations and maintenance, unless the permits are extended on a project-by-project basis.
17	Volume II.1	Approach to Developing Alternatives	II.1.1	Alternatives Carried Forward for Detailed Analysis	II.1-4-5		"...The No Action Alternative assumes that renewable energy and transmission development and mitigation for such projects in the Plan Area would occur on a project-by-project basis in a pattern consistent with past and ongoing renewable energy and transmission projects on federal and non-federal lands within the Plan Area..."	The No Action alternative does not address the complex permitting and mitigation processes that project proponents currently must navigate to develop a project, nor does it address the need for a regional, comprehensive approach to mitigating impacts to resources. The DRECP Action Alternatives are needed in order to address these critical issues holistically. Development will continue without the DRECP, but will not be informed by an overall regional strategy for development and conservation.
18	Volume II.2	No Action Alternative	II.2.1.1	Overview of the No Action Alternative	II.2-1 on	na	na	The DRECP and the landscape-wide approach to project licensing and permitting is more likely to result in improved conservation and protection of the Desert's resources while providing a systematic approach to development of new renewable energy facilities. The continuation of the status quo puts a burden on agencies and project proponents. The DRECP's programmatic approach should improve both process efficiency and effectiveness. The NAA would allow for CDFW to create the NCCP, so there would be some streamlining of permits. USFWS would not be able to create the GCP, however.
19	Volume II.2	No Action Alternative	II.2.1.1	Overview of the No Action Alternative	II.2-2	Paragraph 2	"Under the No Action Alternative, the California Department of Fish and Wildlife (CDFW) <b>would approve</b> a Natural Community Conservation Plan (NCCP) to provide for the conservation of Covered Species and to streamline future permitting of incidental take of California Endangered Species Act (CESA) listed species resulting from renewable energy projects and associated transmission in the California deserts..."	Clarification: this should read "...would <b>NOT</b> approve...", as stated in II.2.3.
20	Volume II.2	No Action Alternative	II.2.1.3.4	Transmission	II.2-22-23	II.2-22	Estimated Long-Term Ground Disturbance - Estimated total acreage affected by Covered Activities such as vegetation clearance, grading, and construction. This is effectively a summation of transmission impacts. This estimate also includes impacts that occur as a consequence of construction activities, including construction areas, laydown yards, and storage facilities. Due to the difficulty of restoration in a desert environment, all activities that result in vegetation	SCE's experience performing vegetation restoration has shown good success within a 1-3 year period. Suggest providing sufficient flexibility in establishing restoration measures to adapt requirements based on demonstrated success.

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							removal or disturbance were considered long term for the purpose of analysis.	
21	Volume II.2	No Action Alternative	II.2.1.3.4.1	Transmission Outside the Plan Area	II.2-24	II.2.1.3.4.1	Table II.2-10 provides the acreage of effects for transmission and substations outside of the DRECP boundary.	1. The DRECP should clearly state that the values for ground disturbance for transmission and substation projects provided in the table are <u>estimates</u> only based on very high-level conceptual transmission planning. Suggest: "Table II.2-10 provides the <b>estimated</b> acreage of effects for transmission and substations outside of the DRECP boundary <b>based on conceptual planning by the TTG.</b> " 2. Add San Bernardino to the Table
22	Volume II.3	Preferred Alternative	II.3.1.1	Overview of the Preferred Alternative	II.3-1	Paragraph 2	"...and a BLM LUPA providing Conservation and Management Actions (CMAs) for resources throughout the Plan Area on BLM-administered lands..."	Clarify sentence - CMAs apply throughout the plan area and not just BLM lands.
23	Volume II.3	Preferred Alternative	II.3.1.1	Overview of the Preferred Alternative	II.3-1	Paragraph 3	"...Transmission development and operation would occur in previously designated corridors and <b>other identified areas</b> , both inside and outside the DFAs..."	Clarify - what is meant by "other identified areas". Transmission projects may need to be sited outside of designated corridors depending on the location of generation sources and existing lines.
24	Volume II.3	Preferred Alternative	II.3.1.1	Overview of the Preferred Alternative	II.3-4	Paragraph 3	"The Plan Area also includes other areas where renewable energy and transmission development and conservation <b>would not be covered occur under the DRECP</b> , including impervious and urban built-up lands, military lands, BLM Open Off-Highway Vehicle (OHV) Areas, the Johnson Valley OHV Shared Use Area, and tribal lands..."	The meaning of sentence is not clear - please clarify. Strikeout "occur"
25	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-27-28	AM-PW-1, 3rd bullet under "covered species"	"Implement current survey protocols for applicable Covered Species <b>that have been approved by the DRECP Coordination Group</b> at the time the surveys are required (see Appendix H).  Presence/absence survey (see Glossary of Terms) protocols <b>will be submitted to the DRECP Coordination Group for review, comment, and approval prior to implementation.</b> "	Survey protocols should only require DCG approval when deviating from approved DRECP survey protocols. The approval process for surveys may not allow for enough time between survey planning and conducting surveys. This will also place a burden on the DCG who should be focusing on higher level issues. Standard survey protocols should be defined and approved up front for use by project proponents.
26	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-28	Survey Requirements and Standards	"Comply with the most recent and applicable assessment protocols and guidance documents...."	These documents and sources should be mentioned or links provided as applicable.
27	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-28	Biological Monitoring/AM-PW-2	"Designated Biologists, approved by DRECP Coordinating Group, will conduct...."	The requirement for all monitoring biologists to be approved by the DRECP Coordinating Group will be time consuming and will most likely not keep up with the demand for monitors on projects within DRECP boundaries. Recommend USFWS/CDFW establish a process for multi-year approval of biologists that approves them to perform certain duties commensurate with their experience/qualifications for <b>any</b> renewable energy or transmission project within the DRECP boundary. Also, please see comment 28 for suggested language for AM-PW-2

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28	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-28	AM-PW-2	<p>"AM-PW-2: <b>Designated Biologists</b> (see Glossary of Terms), approved by the DRECP Coordinating Group, <b>will conduct daily biological monitoring</b> during pre-construction, construction, and decommissioning Covered Activities for all work areas associated with Covered Activities to ensure that avoidance and minimization measures are implemented and are effective."</p> <p>Glossary: "designated biologist. A biologist who is approved as qualified by the DRECP Coordination Group, including Wildlife Agency representatives as appropriate. <b>A designated biologist is the person responsible for overseeing compliance with applicable CMAs for a Covered Activity, including measures to avoid and minimize biological impacts. The responsibilities of a designated biologist include organizing survey and monitoring efforts and being responsible for the content of compliance reports provided to the DRECP Coordination Group.</b> "</p>	<p>The CMA description for the role of Designated Biologists is not consistent with the definition in the glossary. Are all biological monitors going to be designated biologists? Or is the designated biologist, the lead biologist managing monitoring efforts and overseeing the biological monitors? On a large project with potentially hundreds of monitors, it may be logistically problematic for all monitors to be reviewed and approved by DCG.</p> <p>Recommend including several levels of biologists to support covered activities equivalent to authorized (lead or designated), approved (specialist) biologist, or qualified biologists. DCG should only approve designated biologists who are responsible for ensuring the proper implementation and reporting for CMA compliance or approved specialist biologist for particular species or resources (e.g., desert tortoise, Mohave ground squirrel, avian). The designated biologist would be responsible for approving qualified biologist for projects.</p> <p>Suggested language:  <del>"AM-PW-2: Designated Biologists (see Glossary of Terms), approved by the DRECP Coordinating Group, qualified biologists under the direction of a designated biologist, will conduct daily biological monitoring during pre-construction, construction, and decommissioning Covered Activities for all work areas associated with Covered Activities to ensure that avoidance and minimization measures are implemented and are effective."</del></p>
29	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-29	Resource Setback Standards/AM-PW-3	Resource setbacks have been identified to avoid certain resources from adverse effects."	Buffers for specific resources must be identified case by case by a biologist in the field. Since habitats change abruptly in desert systems from riparian to upland, general buffer distances would be too conservative and prohibitive for many activities. A field inspection by a biologist would lead to a more realistic buffer from a known resource.
30	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-29	AM-PW-3	<p>The edge of each of the DRECP natural communities, including but not limited to those in the riparian or wetland natural community groups (as defined by alliances within the natural community descriptions and mapped based on the natural community habitat assessments described in AM-PW-1).</p> <p>The edge of the vegetation extent for plant Covered Species.</p> <p>The edge of suitable habitat or active nest substrates for the appropriate Covered Species. "</p>	<p>The resource setbacks as described present significant challenges to implementation in the field. Natural community edges are not always clear, especially where community types overlap. Given the patchy nature of the extent of plant covered species and suitable habitat for wildlife species, setbacks may be too extensive and create a patchwork of areas that would be difficult if not impossible to manage during construction. For discrete resources (e.g., localized plant population, burrows or burrow complexes, eagle nests) setbacks make sense and are implementable, however, for many biological resources this is not the case.</p> <p>Recommend removing or revising bullets 1, 4, and 5.</p>

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31	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-29	AM-PW-4	"For Covered Species implement all species-specific seasonal restrictions on pre-construction, construction, operations, and decommissioning related Covered Activities."	<p>Projects with long construction times will have significant challenges working with seasonal restrictions for multiple species. This in turn increases the length of time that a project is in construction and consequently the overall impacts to resources. Recommend developing a process to determine appropriate seasonal restrictions depending on species and project requirements, rather than having blanket seasonal restrictions.</p> <p>Suggested language:  <del>"For Covered Species implement all species-specific</del>  Appropriate seasonal restrictions for <del>on</del> pre-construction, construction, operations, and decommissioning related Covered Activities will be implemented depending on Covered Species present and project requirements. Project-specific seasonal restrictions will require review and approval by the DCG"</p>
32	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAS	II.3-30	AM-PW-6	Common Raven management actions will be implemented for all projects to address food and water subsidies and roosting and nesting sites specific to the Common Raven. These include identification of monitoring reporting procedures and requirements; strategies for refuse management; as well as design strategies and passive repellent methods to avoid providing perches, nesting sites, and roosting sites for Common Ravens.	There are no proven designs or repellants to prevent perching, nesting or roosting by ravens in relation to electric utility infrastructure. Preventing ravens from perching, nesting, and roosting on transmission structures is not possible given the persistence of ravens and their potential use of almost any structure for these purposes. Recommend the DRECP establish a DRECP-wide raven control program to remove raven nests and ravens that prey on covered species.
33	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-31	Restoration of Areas Disturbed by Construction Activities But Not Converted by Long-Term Covered Activities	General Comment	Restoration standards and criteria need to be clearly defined.
34	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-31	AM-PW-6	"Covered Activities will take actions to not introduce, dispose of, or release any non-native species into areas of native habitat, suitable habitat, and natural or artificial waterways/water bodies. "	<p>Invasive plant management should focus on areas that do not have invasive plants established and preventing the spread outside those areas where they are established. Some non-native species are well-established in certain areas are cannot be controlled by project proponents.</p> <p>Suggested language:  "Covered Activities will take actions to not introduce, dispose of, or release any non-native species into areas of native habitat, suitable habitat, and natural or artificial waterways/water bodies <b>where non-native species are not already present.</b>"</p>

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35	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAS	II.3-37	AM-PW-16	"...Immediately notify the Designated Biologist, <b>who will take the injured animal</b> to a pre-approved wildlife care center or veterinary facility...."	It may not be practical for the Designated Biologist to take an injured animal to a wildlife rehabilitation facility.  Suggest language change: "...Immediately notify the Designated Biologist, who will take <b>or arrange for a qualified biologist to take</b> the injured animal to a pre-approved wildlife care center or veterinary facility...."
36	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAS	II.3-38	AM-PW-17	"All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, exclusion fencing will be installed around the trench or excavation. Open trenches or other excavations will be inspected by a Designated Biologist immediately before backfilling, excavation, or other earthwork. "	Covering of all trenches and excavations is not always practicable or effective given that gaps may remain that wildlife can get into. Suggest adding the use of earth or artificial escape ramps for wildlife.  Suggested language: "All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, <b>escape ramps will be placed in the excavation</b> or exclusion fencing will be installed around the trench or excavation. Open trenches or other excavations will be inspected by a Designated Biologist immediately before backfilling, excavation, or other earthwork. "
37	Volume II.3	Preferred Alternative	II.3.1.2.5.3	Landscape-Level Avoidance and Minimization CMAS	II.3-42	AM-LL-4	Utilizing unguayed monopole towers or tubular towers to reduce Common Raven perches as well as bird and bat collisions.	Monopole/tubular structures for transmission do not reduce perching of ravens. Preventing ravens from perching, nesting, and roosting on transmission structures is not possible given the persistence of ravens and their potential use of almost any structure for these purposes. Recommend the DRECP establish a DRECP-wide raven control program to remove raven nests and ravens that prey on covered species.
38	Volume II.3	Preferred Alternative	II.3.1.2.5.3	Plan-Wide Avoidance and Minimization CMAS	II.3-43	Project-Specific Bird and Bat Operational Actions for Covered Species/AM-LL-4	Installing flight diverters on transmission lines according to the most current Wildlife Agency guidelines.	Use of flight diverters on transmission lines should be limited to those areas with a high concentration of bird movement, such as near large water bodies that attract birds, and where collision risk is moderate to high. The language needs to be more specific as to where diverters will be used. Suggest: "Installing flight diverters on transmission lines <b>in areas of water crossings and known flyways for birds</b> according to <b>the most current existing</b> Wildlife Agency guidelines."
39	Volume II.3	Preferred Alternative	II.3.1.2.5.3	Landscape-Level Avoidance and Minimization CMAS	II.3-43	AM-LL-4 bullet 9	"Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring. This monitoring program will ensure that the information collected during operations is reported to the DRECP Coordination Group in a way that is compatible for use in the MAMP."	Bird and bat mortality studies should be addressed as an adaptive management issue. If mortality studies demonstrate there is minimal risk to birds and bats, then the studies should be discontinued. Likewise, if there is a higher level of mortalities, then additional measures may need to be implemented.

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40	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-48	AM-DFA-RIPWET-1 and Table II.3-6	"The riparian and wetland natural communities and other features listed in Table II.3-6 will be avoided to the maximum extent practicable (see "unavoidable impacts to resources" in the Glossary of Terms) with the specified setback in DFAs. "	Setback distances (0.25 miles) are greater than necessary for the protection of wetland resources which typically have buffers of 25 to 50 feet, depending on the circumstance. The setbacks may not be feasible for a transmission line crossing these communities or features depending on the size and extent of riparian habitat. Given the patchy distribution of riparian resources, large setbacks may preclude siting in areas that are less sensitive. Suggest using smaller setbacks.
41	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-48	Common to Riparian and Wetland Natural Community CMAs	Table II.3-6	Setbacks should be case by case as determined by a biologist in the field and reflect site-specific conditions. The proposed setbacks are not scientifically based and do not reflect setbacks that have been established for similar transmission projects within the DRECP boundary.
42	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-50	Riparian and Wetland Bird Covered Species	Based on the results of the pre-construction nesting bird survey for Covered Activities within 0.25 miles of any riparian or wetland natural communities.."	Buffers for nesting birds should conform to species-specific standards developed in conjunction with feedback from the CDFW when applicable.
43	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-50	AM-DFA-RIPWET-3	For pre-construction, construction, and decommissioning Covered Activities within 0.25 mile of any riparian or wetland natural communities, conduct a pre-construction nesting bird survey for riparian and wetland bird Covered Species according to DRECP-approved protocols.	This buffer is excessive. 300 ft buffers are more standard for riparian bird species and have proven sufficient to avoid disturbance on SCE projects.
44	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-50	AM-DFA-RIPWET-3	"For pre-construction, construction, and decommissioning Covered Activities within 0.25 mile of any riparian or wetland natural communities, conduct a pre-construction nesting bird survey for riparian and wetland bird Covered Species according to DRECP-approved protocols. Based on the results of the pre-construction nesting bird survey for Covered Activities within 0.25 mile of any riparian or wetland natural communities, setback pre-construction, construction and decommissioning Covered Activities 0.25 mile from active nests of riparian and wetland bird Covered Species during the breedingseason (February 1 through August 31)."	0.25 mile setbacks are excessive and do not follow general guidelines for the protection of nesting birds. 300 to 500 foot buffers around listed and sensitive nesting birds is the typical distance required by agencies and incidental take permits.
45	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-50	AM-DFA-RIPWET-5	Setback pre-construction, construction, and decommissioning Covered Activities 0.25 mile from occupied habitat during the breeding season (March 1 through September 1).	0.25 mile setbacks are excessive and do not follow general guidelines for the protection of nesting birds. 300 to 500 foot buffers around listed and sensitive nesting birds is the typical distance required by agencies and incidental take permits. 300 ft buffers have proven sufficient to avoid disturbance on SCE projects. Same comment as AM-DFA-RIPWET-3 (comments 43 and 44)
46	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species	II.3-51	AM-DFA-RIPWET-6		Same comment as AM-DFA-RIPWET-3 (comments 43, 44)

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				Avoidance and Minimization CMAs in DFAs				
47	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-51	AM-DFA-RIPWET-8	Tehachapi Slender Salamander "Avoid pre-construction, construction, and decommissioning Covered Activities within 0.25 mile of existing or newly discovered occurrences or suitable habitat."	0.25 mile buffer for Tehachapi slender salamander or habitat is excessive and ineffective given the patchy distribution of the species, the narrow width of riparian habitat areas, and locations near roads and other developed areas. Suggest using 50 foot buffer.
48	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-57	AM-DFA-AG-3	A Designated Biologist (see Glossary of Terms) will conduct biological monitoring (see Glossary of Terms) to ensure avoidance of occupied burrows and establishment of the 200 meter setback to sufficiently minimize disturbance during the nesting period on all project sites.	This buffer is excessive. 250 ft buffers are more standard for active burrowing owl burrows and have proven sufficient to avoid disturbance on SCE projects.
49	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-57	AM-DFA-AG-2	Swainson's hawk footnote 3: "Other Covered Activities, besides solar, geothermal, and wind projects (such as road construction and road maintenance) can occur within 0.5 mile of an active nest during the non-breeding season or after an active nest is no longer in use for that season. <b>A nest will be considered active if it was used one or more times within the last five years.</b> Determination of the status of a Swainson's hawk nests will happen in collaboration with the appropriate DRECP Coordination Group."	Suggest revised footnote language regarding active Swainson' hawk nest. "A nest should only be considered active if there is breeding activity or eggs or young in the nest <del>A nest will be considered potentially occupied if it was used one or more times in the last five years,</del> impacts to nest will be avoided at all times."
50	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-60	AM-DFA-PLANT-2	"Implement an avoidance setback of 0.25 mile for all plant Covered Species occurrences. Setbacks will be placed strategically adjacent to occurrences to protect ecological processes necessary to support the plant Covered Species (see Appendix Q, Baseline Biology Report)."	0.25 mile setback is not feasible given the patchy distribution of many plant species. Suggest revising language to refer to populations or population centers with a setback of 100 feet.
51	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-60	AM-DFA-PLANT-3		0% disturbance to habitat of triple-ribbed milkvetch and Bakersfield cactus is not practical given the potentially scattered distribution of individuals of these species. Suggest focusing on protection of individuals or populations.
52	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-62	Table II.3-11	Setback pre-construction, construction, and decommissioning Covered Activities 500 feet from active nests.	The setback is overly conservative. 300 ft should be sufficient.
53	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization	II.3-62	Table II.3-11	Setback wind and transmission projects 5 miles from nest sites.	Condors are not known to collide with transmission lines, so this setback is overly conservative.

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				CMA in DFAs				
54	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-62	Table II.3-11	Setback pre-construction, construction, and decommissioning Covered Activities 0.25 mile from suitable habitat during the breeding season (April 1 through July 31).	The setback is overly conservative - please provide justification. 300 ft should be sufficient.
55	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-62	Table II.3-11	Setback Covered Activities 1 mile from active or alternative nests within an active territory as described in AM-DFA-ICS-26.	To be consistent with USFWS recommendations, the setback should only be for active nests, not alternative nests. Suggest: "Setback Covered Activities 1 mile or <b>0.5 miles if no line of sight</b> from active <del>or alternative</del> nests within an active territory as described in AM-DFA-ICS-26."
56	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-62	AM-DFA-ICS-2	Gila woodpecker: "Setback pre-construction, construction, and decommissioning Covered Activities 0.25 mile from suitable habitat during the breeding season (April 1 through July 31). California condor: "Setback wind and transmission projects 5 miles from nest sites."	Gila woodpecker - 0.25 mile setback from suitable habitat is excessive. Suggest 500 foot buffer. California condor - 5 miles setback is excessive for transmission projects. Suggest using 1 mile buffer.
57	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-63	AM-DFA-ICS-5	"Covered Activities, except for transmission projects in existing transmission corridors, will avoid the desert tortoise conservation areas (TCAs) and the desert tortoise linkages identified in Appendix H, except the portion of the TCA in the northern Fremont Valley converted to intensive agriculture prior to 2013."	As discussed in comment 69 below, SCE will attempt to avoid desert tortoise conservation areas and utilize existing ROW corridors but this is not always achievable. Suggest rewording to: "Covered Activities, except for transmission projects in existing transmission corridors, will avoid <b>to the extent practicable</b> the desert tortoise conservation areas (TCAs) and the desert tortoise linkages identified in Appendix H, except the portion of the TCA in the northern Fremont Valley converted to intensive agriculture prior to 2013."
58	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-64	AM-DFA-ICS-10	"Additionally, short-term desert tortoise exclusion fencing will be installed around short-term construction areas (e.g., staging areas, storage yards, excavations, and linear facilities) per the Desert Tortoise Field Manual (USFWS 2009) or most up-to-date USFWS protocol."	Decisions regarding the use of exclusion fencing for small construction areas and linear facilities should be made on a case-by-case basis by the authorized tortoise biologist in consultation with the DRECP CG. Installation and maintenance of fencing presents hazards to tortoise and impedes their movement. Fencing should only be used where the benefit outweighs the impacts.
59	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-64	AM-DFA-ICS-10	"Covered Activities will construct desert tortoise exclusion fences between November 1 and March 14 to minimize impacts to tortoises and to accommodate subsequent desert tortoise surveys."	Fencing should be allowed to be installed at all times of the year if the appropriate clearance surveys and avoidance measures are employed. Delaying installation of fencing may scheduling implications for other project work that may increase level of risk to tortoises.
60	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMA in DFAs	II.3-67	AM-DFA-ICS-20	Structures supported by guy wires will be marked with recommended bird deterrent devices at the appropriate spacing intervals.	Guy wire marking should only be needed for structures over 200 feet in height, such as communication or meteorological towers. Distribution pole guy wires do not present a collision hazard that would justify marking. These recommendations are consistent with USFWS guidance.

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61	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-68	AM-DFA-ICS-25	A Condor Operations Strategy (COS) will be developed and implemented on a project-specific basis with the goal of avoiding mortality from operations of Covered Activities. No take of condor will be permitted in the form of kill or injury from operation of Covered Activities.	Should only be developed for projects where condors are likely to be impacted. Transmission line projects should not need a COS.
62	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-68	AM-DFA-ICS-26	Covered Activities will not be sited or constructed within 1-mile of any active or alternative golden eagle nest within an active golden eagle territory (see Appendix H).	The buffer should be 0.5 miles for nests that are not within the line of sight for project activities. Consistent with USFWS recommendations, the setback should only be for active nests, not alternative nests. USFWS has never required this buffer for alternative nests that are not active that season. A 0.5 mile buffer should be used for active nests that are not within line of sight of activities. Suggest: "Covered Activities will not be sited or constructed within 1 mile of any active golden eagle nest within an active golden eagle territory. <b>A 0.5-mile buffer will be used for active nests that are not within line of sight of project activities</b> (see Appendix H)."
63	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-69	AM-DFA-ICS-30	Project proponents of Covered Activities will conduct a risk assessment per the USFWS Eagle Conservation Plan Guidance using available information as well as the data collected in the pre-project golden eagle surveys in AM-DFA-ICS-28 and pre-construction risk assessment surveys in AM-DFA-ICS-29, if applicable.	This guidance is specific to wind energy and is not directly applicable to transmission projects. Suggest: " <b>Wind</b> Project proponents of <del>Covered Activities</del> will conduct a risk assessment per the USFWS Eagle Conservation Plan Guidance using available information as well as the data collected in the pre-project golden eagle surveys in AM-DFA-ICS-28 and pre-construction risk assessment surveys in AM-DFA-ICS-29, if applicable."
64	Volume II.3	Preferred Alternative	II.3.1.2.5.4	Natural Communities and Covered Species Avoidance and Minimization CMAs in DFAs	II.3-69	AM-DFA-ICS-31	Implement site-specific golden eagle mortality monitoring in support of the pre-construction risk assessment surveys described in AM-DFA-ICS-29.	Mortality monitoring may not be warranted for electric infrastructure if it's built in accordance with APLIC.
65	Volume II.3	Preferred Alternative	II.3.1.2.5.2	Plan-Wide Avoidance and Minimization CMAs	II.3-70	Mammal Covered Species	"Detected occurrences of Mohave ground squirrel will be flagged and avoided with a minimum of 50 ft."	Due to the shy/sensitive natural of this species, buffers should be increased to a minimum of 100 ft.
66	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-71	AM-RES-BLM-DUNE-1	"Non-Covered Activities will be prohibited within Aeolian transport corridors, except as needed to maintain existing development or improve land management capabilities."	Depending on the width or extent of the aeolian sand corridor, it may not be practical to completely avoid siting within the corridor, especially for linear facilities that need to span these areas. Transmission lines do not impede sand movement and access roads can be used within sand transport processes. Protection of sand transport corridors should focus on facilities that block sand movement. Suggest: " <b>Facilities with the potential to block or alter sand transport processes will comply with the following: Setback 0.25 miles from aeolian corridors and Mojave fringe-toed lizard suitable habitat.</b> "

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67	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-72	AM-RES-BLM-DUNE-2	"Non-Covered Activities, and any newly constructed roads and/or routes, will comply with the following: Setback 0.25 mile from Aeolian corridors and Mojave fringe-toed lizard suitable habitat.	Depending on the width or extent of the aeolian sand corridor, it may not be practical to completed avoid siting within the corridor, especially for linear facilities that need to span these areas. Suggest: "Setback 0.25 mile from Aeolian corridors and Mojave fringe-toed lizard suitable habitat <b>where feasible.</b> "
68	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-74	AM-RES-BLM-PLANT-1	"For all land allocations, substations will be sited in such a way as to avoid suitable habitat for all plant Covered Species."	Suitable habitat is a broad term that may encompass areas that are not occupied by covered plant species. Suggest revising to include only <b>occupied</b> habitat.
69	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-74	AM-RES-BLM-ICS-4	"All activities will not exceed the long-term ground disturbance cap (see "BLM disturbance cap" in the Glossary of Terms) shown below in Table II.3-12 for portions of the BLM LUPA conservation designations that are required for desert tortoise conservation."	SCE will attempt to avoid desert tortoise conservation areas and linkages when siting a Transmission Project but that is not always feasible due to myriad factors. The Plan should establish a defined process for transmission projects to obtain agency approval to exceed ground disturbance of 0.1/0.5% of the ACECs in Table II.3-12
70	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-79	AM-RES-RL-PLANT-1	"Impacts to suitable habitat for all plant Covered Species within lands added to the reserve will be limited to 1% of their suitable habitat in the Plan Area (see "DRECP disturbance cap" in the Glossary of Terms)."	Depending on the description of suitable habitat in the plan area, this measure may be overly limiting.
71	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-79	AM-RES-RL-PLANT-2	"All Covered Activities will require an avoidance setback of 0.25 mile from plant Covered Species occurrences. Setbacks will be placed strategically to protect ecological processes."	0.25 mile setback may not be feasible given the patchy distribution of plant species.
72	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the Reserve	II.3-79	AM-RES-RL-PLANT-3	"Substations will be sited in such a way as to avoid all suitable habitat."	Avoiding ALL suitable habitat may not be feasible in some areas. Suggest revising to avoid <b>occupied</b> habitat or reduce setback.
73	Volume II.3	Preferred Alternative	II.3.1.2.5.5	Natural Communities and Covered Species Avoidance and Minimization CMAs in the	II.3-80	AM-RES-RL-ICS-8	"Covered Activities will not be located in Flat-tailed horned lizard Management Areas."	Transmission projects may not be incompatible with flat-tailed horned lizard management strategies and should not necessarily be excluded from the Management Areas. Suggest: "Covered Activities <b>that are incompatible with flat-tailed horned lizard management objectives</b> will not be located in flat-tailed horned lizard Management Areas."

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				Reserve				
74	Volume II.3	Preferred Alternative	II.3.1.2.5.6	Transmission Avoidance and Minimization CMAs	II.3-82	AM-TRANS-1	Bury electrical collector lines along roads or other previously disturbed paths to minimize new surface disturbance, restrict perching opportunities for the Common Raven, and reduce collision risks, where feasible.	There are no proven designs or repellants to prevent or restrict perching, nesting or roosting by ravens in relation to electric utility infrastructure. Preventing ravens from perching, nesting, and roosting on transmission structures is not possible given the persistence of ravens and their potential use of almost any structure for these purposes. Recommend the DRECP establish a DRECP-wide raven control program to remove raven nests and ravens that prey on covered species.
75	Volume II.3	Preferred Alternative	II.3.1.2.5.6	Transmission Avoidance and Minimization CMAs	II.3-82	AM-TRANS-1	"Bury electrical collector lines along roads or other previously disturbed paths to minimize new surface disturbance, restrict perching opportunities for the Common Raven, and reduce collision risks, where feasible."	Please clarify what is meant by electrical collector lines. Depending on the voltage, burying collector lines above 66kV will be problematic and may introduce additional ground disturbance during O&M activities, in addition to having greater ground disturbance than poles or lattice steel structures.
76	Volume II.3	Preferred Alternative	II.3.1.2.5.6	Transmission Avoidance and Minimization CMAs	II.3-83	AM-TRANS-2	"Flight diverters will be installed on all transmission projects spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The type of flight diverter selected will be subject to approval by the DRECP Coordination Group, and will be based on the best available scientific and commercial data regarding the prevention of bird collisions with transmission projects and guy wires.	Flight diverters should only be used near large water bodies with a high probability of bird activity. In the desert stream and wash channels may be small, dry, or have minimal bird activity. An assessment should be conducted to determine on a case-by-case basis whether flight diverters are necessary or would be effective.  Suggested language change: " <b>An assessment will be conducted to determine locations that flight diverters would be utilized on transmission lines. Areas to be assessed would include flight diverters will be installed on all transmission</b> projects spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The <b>location and</b> type of flight diverter selected will be subject to approval by the DRECP CG..."
77	Volume II	Description of Alternatives	II.3	Preferred Alternative	II.3-83	AM-TRANS-3	"AM-TRANS-3: Avoid siting transmission projects that span canyons or are located on ridgelines. Site and design sufficient distance between transmission lines to prevent electrocution of condors."	"AM-TRANS-3: Avoid siting transmission projects that span canyons or are located on ridgelines <b>where feasible</b> . Site and design sufficient distance between transmission lines to <b>prevent reduce risk of</b> electrocution of condors."

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78	Volume II.3	Preferred Alternative	II.3.1.2.5.6	Transmission Avoidance and Minimization CMAs	II.3-83	AM-TRANS-3	"Avoid siting transmission projects that span canyons or are located on ridgelines. Site and design sufficient distance between transmission lines to prevent electrocution of condors."	Transmission line siting is dependent upon a number of topographic and engineering requirements and it may not be possible to avoid all canyons or ridgelines.  Clarify second sentence -- there is no electrocution hazard between transmission lines, based on the intent of the sentence the reference should be to the distance between conductors (or phases) of a single transmission line. However, distances between conductors should be sufficient to avoid electrical contact by condors.
79	Volume II.3	Preferred Alternative	II.3.1.2.5.6	Transmission Avoidance and Minimization CMAs	II.3-83	AM-TRANS-4	"Restrict transmission projects to be within designated utility corridors and to be sited and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare natural community alliances, and Covered Species. Transmission substations will be sited to avoid Aeolian corridors, rare natural community alliances, and sand-dependent Covered Species habitats."	This measure assumes there will be designated utility corridors <b>or rights-of-way</b> in the locations that transmission lines will need to be sited. There should be an approval process for lines that need to be located outside a designated corridor. Suggested language: "Restrict transmission projects to be within designated utility corridors <b>or rights-of-way unless the locations are needed to interconnect to renewable generation facilities in the DFAs and are approved by the DRECP CG. Where feasible</b> , transmission projects shall be sited and designed to avoid, <del>where possible</del> , and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare natural community alliances, and Covered Species. Transmission substations will be sited to avoid Aeolian corridors, rare natural community alliances, and sand-dependent Covered Species' habitats <b>where feasible.</b> "
80	Volume II	Preferred Alternative	II.3.1.2.5.7	Compensation CMAs	II-3.87	Table II-3.13 and II-3.14		Please provide the justification for requiring transmission projects to compensate 5:1 for desert tortoise in the Reserve but for all other Covered Activities, the compensation ratio is 2:1. (All other comp. ratios are the same). The Plan should allow for adjustment of mitigation ratios based on the quality of the affected habitat and the values provided in the Table should represent the maximum ratio that could be required.
81	Volume II.3	Preferred Alternative	II.3.1.2.5.7	Compensation CMAs	II.3-88	Comp-3	"COMP-3: The compensation for impacts to bird and bat Covered Species from operational Covered Activities will be based on the monitored impacts to bird and bat Covered Species during operations. Each project will include a monitoring program to provide project-specific information on annual operational effects on bird and bat Covered Species. The bird and bat mortality for each project will dictate the amount and type of compensation required to offset the effects of the project.."	Transmission projects have low potential impacts to covered bird and bat species and should be exempt from monitoring requirements. If monitoring is required it should be done on an adaptive management basis, i.e., if 2 years (for example) of surveys are completed and impacts fall below a certain threshold, then no further monitoring would be required.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
82	Volume II	Preferred Alternative	II.3.1.3.5.1	Adaptive Management Framework Plan	II.3-148	Climate Change Model	Managing resources in the Plan Area in the future will require that managers consider a range of environmental changes as possible futures that could substantially alter our current understanding of management needs for the desert ecosystem.	Climate change models are still in relatively early development stages and measures developed to address potential environmental changes should be flexible and should be commensurate with likely impacts from renewable generation and associated transmission projects. Climate change is the cumulative result of multiple anthropogenic activities and is projected to decrease as a result of transitioning from fossil fuels to non-greenhouse gas emitting generation. It would be helpful to provide specifics on the agencies' expectations.
83	Volume II	Preferred Alternative	II.3.1.2.7.2	Cultural Resources	II.3-156	Monitoring	The CMAs include a management fee to be paid to the BLM as partial mitigation for cumulative effects that could be used to develop regional research designs and other forms of off-site and compensatory mitigation	Is there an estimate available for the (cultural resources) management fee? Will a checklist of the monitoring parameters and the determination criteria be developed and allow for stakeholder input? The fee should not be based solely on the amount of ground disturbance or the expected operating life of the project; the significance of the impact and the extent to which the area has been previously affected should be considered.
84	Volume II	Preferred Alternative	II.3.1.2.7.3	Recreation	II.3-159	Avoiding and Minimizing Visual Impacts	· Managing all DFAs as VRM Class IV · Managing all Variance Lands as VRM Class III · Managing all NSHT Corridors, and Lands managed for Wilderness Characteristics as VRM Class II · Managing all Wilderness and Wilderness Study Areas (WSAs) as VRM Class I (as per current BLM Policy.) Importantly, the CMAs for Visual Resource Management require all development, whether within or outside of DFAs, to abide by the BMPs addressed in the BLM's Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands.	Please insert the following sentence to clarify the applicability of the BMPs : " The fact that an activity or use on land outside National Conservation Lands that can be seen or heard within National Conservation Lands shall not preclude or restrict the activity or use outside the boundary of the National Conservation Lands."
85	Volume II	Preferred Alternative	II.3.1.3.7.4	Visual Resources	II.3-158	Visual Resources	The DRECP EIR/EIS identifies a comprehensive suite of required CMAs developed to avoid, minimize, and/or mitigate adverse impacts on visual resources, see Section II.3.2.3.10.	Section II.3.2.3.10 is titled 'Special Vegetation Features.' Instead, Section II.3.2.3.12 Visual Resource Management is the correct reference.
86	Volume II	Preferred Alternative	II.3.1.3.7.4	Visual Resources	II.3-160	monitoring	One critically important element of the BMPs is the requirement for development and implementation of a Visual Resource Impact Monitoring and Mitigation Compliance Plan. This plan is a detailed, project-specific document that would be prepared and submitted for approval <b>at the onset of the project planning process, prior to project approval</b> , to serve as a guide to siting and design. This allows the BLM to review and respond to the plan prior to approving the project and to establish a baseline from which to monitor. (Bold-type added for emphasis)	Completion of a Visual Resource Impact Monitoring and Mitigation Compliance Plan prior to the project planning process and project approval may be infeasible due to uncertainty regarding project design. Without a complete project design identification of mitigation measures to avoid or minimize impacts may not be possible and can change, since impacts would be unknown at this time. Suggest that the Visual Resource Impact Monitoring and Mitigation Compliance Plan be completed and submitted with the overall project application, rather than completed and reviewed by the DCG during the initial planning stages of a project.

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87	Volume II	Preferred Alternative	II.3.1.4.1 II.3.1.4.2 II.3.1.4.3	Table II-3-21, 3-23, 3-24 etc	II-3-173, 174; II-3-182	Description of Activities Associated with various Energy Generation		The FEIR/FEIS should include an evaluation of potential water use associated with new development and the availability of water to ensure that appropriate conservation and protection measures are established.
88	Volume II	Preferred Alternative	II.3.1.4.1 II.3.1.4.2 II.3.1.4.3	Table II-3-21, 3-23, 3-24 etc	II-3-173, 174; II-3-182; II-3-191	Description of Activities Associated with various Energy Generation	Table II.3-21 and Table II.3-23 Generator tie lines (gen-ties) "...Higher voltages can be installed on either monopole or lattice steel structure of up to 160 feet tall...."	Structures can be up to 200 feet tall for double-circuit 220/500 kV transmission lines. Modify language to: "...Higher voltages can be installed on either monopole or lattice steel structure of <b>200 feet or more</b> tall...."
89	Volume II	Preferred Alternative	II.3.1.4.1	Table II.3.21, 3-23, 3-25	II.3-191	Description of Activities Associated with various Energy Generation	Table II.3-25 Generator tie lines (gen-ties). "Generator tie line ROW requirements are described as part of transmission impacts because of the possibility that impacts may occur outside DFAs"	This language should be added to the tables for wind and solar also. See also the subtitle on page II.3-195 "Transmission Lines ( <u>including Generator Tie Lines</u> )" (underline added)
90	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-195	Transmission lines (including generator tie-in lines)	Extending or expanding a transmission line may require acquisition and/or expansion of ROW. Covered transmission line activities would generally occur within an existing ROW,	Utilities will often attempt to place new transmission lines within existing ROWs but that is not always possible for a variety of reasons e.g. location of substations/generators/load centers, available capacity in the existing ROW, changing demographics, etc. Given the locations of the DFAs, the DRECP should re-engage the TTG to advise the Coordinating Committee to perform additional studies for transmission planning purposes -, particularly of the need for new ROWs. Suggest: "Extending or expanding a transmission line may require acquisition and/or expansion of a ROW. Covered transmission line activities would generally <b>but not always</b> occur within an existing ROW..."
91	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-196	Transmission lines (including generator tie-in lines)	The use of helicopters to install transmission lines may reduce the need for access roads in certain situations.	Helicopter use may reduce the need for access roads but will then require helicopter landing/take off locations that should be accounted for in the estimate of ground disturbance in Table II.3-29
92	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II-3-195	Transmission Lines, including gen-tie	Covered transmission line activities would generally occur within an existing ROW,	Putting new transmission lines within existing ROW will not always be an option - either DFAs are located away from existing transmission lines and/or safety-required spacing between lines cannot be accommodated. Additional studies are needed to evaluate the feasibility, location, reliability, and siting of new transmission lines necessary to support and connect new renewable generation to the grid. Suggest: "Covered transmission line activities would generally <b>but not always</b> occur within an existing ROW..."
93	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-196	Transmission Lines, including gen-tie.	"Each 230 kV and 500 kV line is assumed to require a permanent access road"	All transmission lines require access roads for routine O&M activities. The DEIR/DEIS does not appear to adequately address O&M needs for transmission projects and needs to be expanded to cover the expected operational period (75-100 years) for Utility Facilities (see proposed definition). Suggest: " <del>Each 230 kV and 500 kV line is</del> <b>All transmission lines are</b> assumed to require a permanent access road."

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94	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-196	Table II.3-27 Typical ROW Widths and Linear Impacts of Bulk Transmission	Double Circuit Tower Line 34.5 and 66 kV. Access road width N/A. Impact Extent for 1 Linear Mile (Acres): 3.6	Need to add acreage for access roads to perform on-going O&M. Suggest Access Road Width (feet): 24, and Impact Extent for 1 Linear Mile (Acres) 6.6 - assuming ~3 acres for access roads
95	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II-3-197	Substations and switchyards	A new or expanded substation may require ground disturbance to accommodate additional transformers, new distribution line outlets, and possibly new fencing for safety and security.	New or expanded substations almost always require ground disturbance
96	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II-3-197 to 201	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	33 kV to 69 kV Power Lines - no permanent road is assumed to be constructed adjacent to the transmission ROW. 220-500 kV Transmission Lines -Construction of a permanent road within the ROW would allow access for construction and subsequently maintenance inspections and repair. Roads would typically run along the ROW, and consist of compacted gravel surface assumed to be no more than 24 feet wide"	All transmission lines require access roads for routine O&M activities. Suggest: "33 kV to 69 kV Power Lines— <del>no permanent road is assumed to be constructed adjacent to the transmission ROW.</del> <b>and</b> 220-500 kV Transmission Lines -Construction of a permanent road within the ROW would allow access for construction and subsequently maintenance inspections and repair. Roads would typically run along the ROW, and <del>consist of compacted gravel surface</del> assumed to be no more than 24 feet wide"
97	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II-3-197 to 201	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	220-500kV Transmission Lines - Construction of a permanent road within the ROW would allow access for construction and subsequently maintenance inspections and repair. Roads would typically run along the ROW, and consist of compacted gravel surface assumed to be no more than 24 feet wide	SCE's roads for O&M of 220 to 500 kV transmission lines typically do not use compacted gravel. "220-500kV Transmission Lines - Construction of a permanent road within the ROW would allow access for construction and subsequently maintenance inspections and repair. Roads would typically run along the ROW, and <del>consist of compacted gravel surface</del> assumed to be no more than 24 feet wide"
98	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-198	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	Ground-disturbance activities (including grading and clearing vegetation).	Installation of poles will also result in ground disturbance. Suggest: "Grades within <b>pole and/or</b> tower construction/erection areas would be made level to facilitate lifting-equipment placement and operation...."
99	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-198	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	Site preparation (e.g. excavation for foundations) "Foundations would likely utilize steel-reinforced annular concrete rings of nominal widths of 4 feet and nominal thicknesses of 8 inches, the centers of which would be backfilled with indigenous soils."	SCE uses concrete for tower foundations. What is the source for the steel-reinforced annual rings etc described in the table?

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100	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-199	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	Tower Construction (220 kV and 500 kV lines) Tower construction/erection activities include tower construction and cable stringing and pulling. Typically, each tower would require an assembly area of at least 100 feet by 200 feet, resulting in approximately 0.23 acre/mile of short term impacts. Lattice towers would require at least 80,000 square feet per tower for construction. For cable pulling activities two cable-pulling sites of 37,500 square feet each (150 feet by 250 feet) would be needed for each section under construction. The affected acreage associated with these activities are included within the overall ROW estimates and disturbance assumed by the TTG.	Suggest: 1. <b>Pole and/or</b> Tower Construction (220 kV and 66kV to 500 kV lines) 2. Tower construction/erection activities include tower construction, <b>pole, and/or</b> and cable stringing and pulling.... 3. Lattice towers would require <del>at least 80,000</del> <b>a maximum of 48,400</b> square feet per tower for construction.
101	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II.3-199	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	Cleaning and maintenance of transmission line	Inspections and insulator cleanings can occur more frequently than biannually. Suggest: "Biannual <b>or as necessary</b> transmission line inspection and insulator cleaning would take place either via vehicle or helicopter.
102	Volume II	Preferred Alternative	II.3.1.4.4	Transmission	II-3-197 to 201	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Ins	Helicopters could be used for construction reducing the need for access roads	Amend to read "Helicopters <b>and other aerial devices</b> ..."
103	Volume II	Preferred Alternative	II.3.1.4.4.1	Transmission	II.3-202	Table II.3-30 ROW requirements for Transmission Associated with the Renewable Energy Development by Ecoregion Subarea - Preferred Alternative		The DRECP should emphasize more clearly that the estimates are rough. Suggest amending the footnote: "All transmission disturbance data reflect intermediate disturbance values used for comparative purposes in the analysis. Disturbance area estimates reflecting the most recent TTG Report are provided in Appendix K and are based on conceptual planning only and do not indicate detailed analysis."

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104	Volume II	Preferred Alternative	II.3.1.4.4.1	Transmission	II.3-202	Transmission Impacts outside the Plan Area	The TTG Report presents locations of transmission lines on maps for each alternative (see Appendix K), but only to allow general descriptions of environmental impacts that could be expected. No specific transmission routes or upgrades outside the Plan Area have been defined at this time.	The DRECP committee should emphasize in the executive summary and the Preferred Alternative section that the conceptual transmission lines on the maps are not based on careful analysis of siting, reliability, capacity etc and that additional, more detailed studies are needed to provide the necessary landscape-wide analysis. It was clear during the public meetings that multiple stakeholders (e.g. residents, eNGOs, agencies, counties, and others) are not paying close attention to the current language and are interpreting that those conceptual lines represent the locations for new transmission lines to support new renewable energy development.
105	Volume II	Preferred Alternative	II.3.1.4.4.1	Transmission	II.3-203	Transmission outside the Plan area	"Because the load centers that would use the electricity generated by desert renewables are outside of the DRECP boundary, the TTG identified linear miles and acreages of effects associated with transmission outside of the DRECP boundary... The TTG Report presents locations of transmission lines on maps for each alternative (see Appendix K), but only to allow general descriptions of environmental impacts that could be expected. No specific transmission routes or upgrades outside the Plan Area have been defined at this time.	These estimates are based on conceptual rather than detailed transmission planning and are therefore rough. Suggest "Because the load centers that would use the electricity generated by desert renewables are outside of the DRECP boundary, the TTG <b>identified estimated</b> linear miles and acreages of effects associated with transmission outside of the DRECP boundary... The TTG Report presents <b>conceptual</b> locations of transmission lines on maps for each alternative (see Appendix K), but only to allow general descriptions of environmental impacts that could be expected. No specific transmission routes or upgrades outside the Plan Area have been defined at this time."
106	Volume II	Preferred Alternative	II.3.1.4.4.1	Transmission	II.3-203	Transmission outside the Plan area	The TTG Report presents locations of transmission lines on maps for each alternative (see Appendix K), but only to allow general descriptions of environmental impacts that could be expected. No specific transmission routes or upgrades outside the Plan Area have been defined at this time.	The caveat already in Appendix K that the new transmission lines are conceptual only and do not indicate that those routes have been analyzed for reliability, feasibility, siting, or other salient considerations should be restated prominently in the Executive Summary and Volume II.3 Preferred Alternative.
107	Volume II	Preferred Alternative	II.3.1.4.4.1	Transmission	II.3-203		However, approval of the DRECP would not result in any approval of potential future transmission lines outside the Plan Area. All future transmission lines outside of the Plan Area would require new applications by the applicant or utility, compliance with NEPA and CEQA as appropriate, and approvals from the developer (if municipal utilities or irrigation districts) or from the California Public Utilities Commission (if investor-owned utilities) prior to construction. In contrast to transmission facilities within the Plan Area, transmission projects outside the Plan Area would not derive take authorization for state or federally protected species from the DRECP, nor would the DRECP prescribe avoidance, mitigation, or conservation measures for those projects.	Given these statements and similar language elsewhere in the DEIR/DEIS, transmission line developers would not see meaningful streamlining of the permitting process without clear commitment by permitting agencies like the BLM and CPUC that their environmental reviews would rely on the programmatic assessment and measures established in the Plan and only consult with the USFWS/CDFW for aspects of the project that fall outside the analysis. The DRECP could realize greater benefit from landscape-wide planning by re-engaging the TTG to proactively study and identify potential transmission corridors between DFAs. This programmatic analysis for transmission projects would allow project proponents, land management and resource agencies, and environmental groups to focus on developing any additional measures necessary to address unique characteristics or impacts from the project and should result in a shortened permitting process.
108	Volume II	Preferred Alternative	II.3.1.4.x	Solar/Wind Energy Development	II.3-171	on Tables	Installation of utility services	In addition to distribution lines, there may be electrical supply lines to generating facilities

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109	Volume II	Preferred Alternative	II.3.1.5.2.4	DRECP Coordination Group	II.3-213 to 214	Role of the Coordination Group	Add new bullets for "equivalency determination" and "variance process"	SCE recommends including the review of "equivalency determination" and "variances" to the Coordination Group's roles. Suggest: <ul style="list-style-type: none"> <li>• "Reviewing and recommending approval of equivalence determination" and</li> <li>• "Reviewing and recommending approval of requests for variance"</li> </ul>
110	Volume II	Preferred Alternative	II.3.1.5.2.4	DRECP Coordination Group	II.3-216	Securing, Holding, and Managing Funds to Support Implementation Actions	The Coordination Group will seek to secure adequate funding to implement Plan-wide program elements from state, federal and other sources, as well as from implementation fee revenues.	More detail on funding and in particular, implementation fee revenues, is needed. Other (than developing) funding sources should also be identified to ensure that the goals of the DRECP are achieved
111	Volume II	Preferred Alternative	II.3.1.5.2.4	DRECP Coordination Group	II.3-218	Public Agency Working Group	List of governments & government agencies	Shouldn't CA Dept. of Parks & Recreation be included?
112	Volume II	Preferred Alternative	II.3.1.5.2.4	DRECP Coordination Group	II.3-219	Stakeholder Science subgroup	All Science Subgroup members must have expertise in biology or other relevant field of science, or appropriate technical expertise.	The qualification criteria should be developed and made available. For members of the Stakeholder Science Group, formal education in a relevant field should be a requirement.
113	Volume II	Preferred Alternative	II.3.1.5.2.4	DRECP Coordination Group	II.3-220	Independent Science Input		Please specify the minimum qualifications, including formal education in the relevant field for members of this subgroup
114	Volume II	Preferred Alternative	II.3.1.5.2.4 II.3.1.5.8	DRECP Coordination Group Modifications and Amendments	II.3-221 II.3-245	DRECP Modifications and Amendments	Modifications and amendments to the DRECP are expected to occur over the course of the plan term	Are there plans to refresh or update the DRECP to reflect Governor Brown's statements in January 2015 about increasing California's RPS to 50%? If so, stakeholder review and input should be included in the process
115	Volume II	Preferred Alternative	II.3.1.5.2.6	Partnership with Local Governments	II.3-222			SCE encourages the DRECP to actively engage local governments in the process since renewable energy and transmission infrastructure projects typically include both public and private lands

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116	Volume II	Preferred Alternative	II.3.1.5.3.1	Integrated Project Proposal Review Process	II.3-226	Agency Coordination	<p>The USFWS, BLM, CDFW, CEC, and CSLC, and any other federal, state, or local agencies that become DRECP participating agencies, will coordinate the environmental review and regulatory actions for Covered Activities by engaging the Coordination Group. Participating agencies will require proponents of Covered Activities under the agencies' authority to complete a DRECP integrated project proposal (see below)...</p> <p>Each participating agency will determine independently, and in accordance with the agency's statutory authorities and responsibilities, what regulatory action to take with regard to a proposed Covered Activities under its authority. However, each participating agency will consider the Coordination Group's input during the agency's environmental review of the proposed Covered Activity and will coordinate directly with any other participating agency with authority over the Activity to ensure that the requirements for federal and state take authorizations are consistent and are not duplicative. For example, BLM and CDFW will coordinate directly regarding Covered Activities that are proposed on BLM lands and do not fall within CEC jurisdiction, and will provide joint guidance to the proponent of the Activity about DRECP project proposal requirements and the requirements of DRECP CMAs for Covered Species.</p>	<p>The CPUC is not included in the list of participating agencies. Given that most, if not all, renewable energy projects developed in the DRECP boundary require transmission infrastructure that, if constructed by California IOUs, is subject to CPUC approval in addition to the BLM or other participating agencies, a more detailed description is needed of a clear process to ensure that the CEQA environmental review performed by the CPUC process will allow the project proponent to take advantage of the DRECP's pre-established measures and any take authorized under the Plan.</p>
117	II.3-228	Preferred Alternative	II.3.1.5.3.4	DRECP Integrated Project Proposal Submittal & Review Process	II.3-228	Project Proposal Information	<p>"To facilitate streamlining under the DRECP, applicants may submit a Project Proposal to the DRECP Coordination Group for an early, informal review for consistency with DRECP requirements."</p>	<p>SCE recommends a suggested timeframe for the informal consistency review be referenced within the DRECP. SCE suggests the insertion of the following language:          "To facilitate streamlining under the DRECP, applicants may submit a Project Proposal to the DRECP Coordination Group for an early, informal review for consistency with DRECP requirements. <b>The DRECP Coordination Group will employ reasonable efforts to complete this informal review within 4 to 6 weeks of the submission of a complete request for review.</b>"</p>
118	Volume II	Preferred Alternative	II.3.1.5.3.4	DRECP Integrated Project Proposal Submittal & Review Process	II.3-228	Project Proposal Information	<p>Where the Coordination Group has initially assessed a Project Proposal and concluded that it is consistent with DRECP requirements, an Application submitted to the appropriate permitting/approval agencies that is consistent with the Project Proposal will benefit from the specific DRECP streamlining timeframes described below.</p>	<p>Given these statements and similar language elsewhere in the DEIR/DEIS, transmission line developers would not see meaningful streamlining of the permitting process without clear commitment by permitting agencies like the BLM and CPUC that their environmental reviews would rely on the programmatic assessment and measures established in the Plan and for the NEPA/CEQA process would only undertake additional consultation with the USFWS/CDFW for aspects of the project that fall outside the programmatic assessment.</p>

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119	Volume II	Preferred Alternative	3.1.5.3.4	Integrated Project Proposal Submittal and Review Process	II.3-228, II.3-229	<p>General Setting and Existing Conditions</p> <p>The Project Proposal must include a general description of the existing project setting and physical conditions, including at least the following:</p> <ul style="list-style-type: none"> <li>• Physical setting (e.g., topography, major rivers or drainages, etc.)</li> <li>• Existing or authorized land uses</li> <li>• Known or potential biological resources in the project vicinity</li> <li>• Identification of DRECP-specific requirements and status, as shown in Exhibit II.3-9, Tables 1–8)</li> <li>• Identification of Agency-specific application requirements and status (e.g., BLM [Plan of Development], CEC specific requirements, CSLC, CDFW)</li> </ul> <p>This general information will be available on the DRECP data portal.</p>	<p>The DRECP Integrated Project Proposal Submittal and Review Process is listed as an <u>optional</u> review that with a favorable recommendation could allow for project applicants to benefit from streamlined timelines for application processing. The CPUC, SCE's lead state agency for major transmission projects, is not listed as an agency participating in the DRECP Coordination Group, as described in the plan. As a result, it does not appear the benefits of a streamlined process may be fully experienced by SCE. Additionally, if SCE elected to participate in this review process, the timing of submitting information to the Coordination Group would likely need to coincide with the timing of public outreach efforts such as open houses, given that the process as described indicates that project information would be made available on the DRECP portal. As an optional process this seems to not be a significant issue as SCE could choose to participate if a particular project schedule could accommodate this review. However if agencies were to require or self impose this optional review as mandatory, there could be consequences to typical project schedule timeframes to incorporate this new activity and potentially to delivery of the renewable generation.</p>
120	Volume II	Preferred Alternative	II.3.1.5.3.4	DRECP Integrated Project Proposal Submittal & Review Process	II.3-229	<p>General Project Information</p> <p>The Project Proposal must include at least the following components:</p> <ul style="list-style-type: none"> <li>· Project applicant information</li> <li>· Project type and brief project description</li> <li>· Project location, including county, ecoregion subarea, APNs, and/or legal description</li> <li>· Map of the project location</li> <li>· Map of the project site</li> <li>· Site ownership (e.g., private, BLM, etc.)</li> <li>· Project size, including proposed development footprint acreage</li> <li>· Project schedule</li> </ul>	<p>Since the permitting agency(ies) have not made a decision on the project at the pre-application phase, information like the location, map, site ownership, etc. will not be finalized. The routes for linear projects like transmission lines may change to reflect direction from the permitting agency(ies) which would then likely alter the environmental impacts analysis and any associated measures. If the route changes, is the expectation that the project proponent would then have to reinitiate the pre-application review by the DRECP Coordinating Committee?</p>
121	Volume II	Preferred Alternative	II.3.1.5.3.4	DRECP Integrated Project Proposal Submittal & Review Process	II.3-229 to 230	<p>Project Proposal Information</p> <p>Add new section "Project Utility Coordination"</p>	<p>To facilitate coordination through the review and permitting process, suggest adding new section:</p> <p><b>"Project Utility Coordination Renewable development project applicants should coordinate both the content and timing of applications for federal and/or state take authorizations with the entity providing interconnection to the grid, including but not limited to any preliminary project proposals to the DRECP Coordination Group. Coordination of the take authorizations of both the utility and the renewable energy project proponent will: (1) help to ensure that the DRECP reviewing agencies have all relevant information; and (2) allow the different take applications to be processed concurrently. To this end, as part of the DRECP Coordination Group review process, a description</b></p>

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							<p>of the coordination and related utility facilities necessary to support the project is recommended:</p> <ul style="list-style-type: none"> <li>• Include the full description of any needed utility facilities, including any necessary transmission lines, system upgrades, needed telecommunications and/or fiber optic cable routes, etc. to the extent they are not speculative;</li> <li>• Include a full and complete environmental analysis of the utility facilities and scope of work, including but not limited to the acquisition of any real property required for the project;</li> <li>• Describe with particularity the anticipated environmental impacts expected to result from the utility facilities, distinct from the renewable energy project as a whole. For example, if the utility facilities alone are expected to result in no significant, unavoidable environmental impacts, the underlying CEQA/NEPA document should affirmatively and explicitly state as much. If the utility facilities are expected to result in significant impacts, the project's CEQA/NEPA document should specifically enumerate which transmission utility facility impacts were found to be significant and unavoidable despite the implementation of mitigation; and</li> <li>• Specifically identify any mitigation measures (and/or applicant proposed measures (APMs)) and permits which the underlying CEQA/NEPA document presumes to be applicable to the utility facilities and scope of work."</li> </ul>
122	Volume II	Preferred Alternative	II.3.1.5.4 Summary Submittal and Review Process for Projects Seeking Streamlining Under DRECP Including Required Avoidance, Minimization, and Mitigation Requirements	II.3-232	After CMA discussion, 2nd full paragraph	Add new paragraph describing "equivalency determination"	<p>SCE recommends the incorporation of an "equivalency determination" processes into the DRECP through the Coordinating Group to ensure that site- and project-specific issues can be fully addressed while simultaneously protecting biological resources. This equivalency determination would permit altering and/or replacing standard DRECP CMAs provided that such modifications continued to ensure equivalent protection of biological resources. Suggested insertion: "Upon review, the DRECP Coordination Group and/or take permitting agency may determine that certain CMAs are infeasible, impractical, or otherwise unwarranted. In those circumstances, the DRECP Coordination Group may recommend, and/or the take permitting agency may agree, to delete those CMAs and substitute for them other measures that the permitting agency finds are equivalent or more effective in mitigating the impacts of the project."</p>
123	Volume II	Preferred Alternative	II.3.1.5.4 Summary Submittal and Review Process for Projects Seeking Streamlining	II.3-233 to -234	Exhibit II.3-9		<p>It would be helpful if there were specific examples of a renewable generation project and a transmission project going through the flowchart with time ranges for each of the milestones. This information could be provided in an appendix rather than the body of the document if appropriate</p>

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				Under DRECP Including Required Avoidance, Minimization, and Mitigation Requirements				
124	Volume II	Preferred Alternative	II.3.1.5.5	DRECP Conservation Area Assembly	II.3-235	Reserve Assembly	Only lands that will significantly contribute to the assembly of the reserve, both with regard to protection of existing important resources and the ability to manage the resources in perpetuity, will be acquired.	Is there a definition for "significantly"?
125	Volume II	Preferred Alternative	II.3.1.5.8	Modifications and Amendments	II.3-246	Modifications	The Coordination Group will maintain an appropriate record of all modifications to the DRECP and permit(s)	Will the updated information also be available on the DRECP website?
126	Volume II	Preferred Alternative	II.3.1.5.8	Modifications and Amendments	II.3-246	Modifications	Add bullet for "equivalency determination"	SCE recommends the incorporation of an "equivalency determination" processes into the DRECP through the Coordinating Group to ensure that site- and project-specific issues can be fully addressed while simultaneously protecting biological resources. This equivalency determination would permit the altering and/or replacement of standard DRECP CMAs provided that such modifications continued to ensure equivalent protection of biological resources. Suggested new bullet: <b>"Removal of CMAs not applicable to the proposed project and/or substitution of CMAs with equivalent or more effective measures to mitigate the impacts of the project."</b>
127	Volume II	Preferred Alternative	II.3.1.5.8	Modifications and Amendments	II.3-247	Modifications	Add bullet for "variance process"	SCE suggests incorporation of a variance process in support of projects needed to meet the DRECP's goals but may not be fully consistent with certain DRECP land use plans or terms. For example, such a variance process may be used in instances where transmission projects need to be partially sited in reserve or study areas. Suggested new bullet: <b>"Variances from DRECP land use elements (e.g., LUPA, GCP, NCCP) necessary due to circumstances associated with site development features, scope of the proposed project, and/or operating characteristics requiring special consideration and conditions so they may be designed, located, and operated compatibly with the DRECP's general goals."</b>

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128	Volume II	Preferred Alternative	II.3.1.6.3	Take Allocation Assumptions and Approach	II.3-252	II.3.1.6.3 and Table II.3-33		The DRECP should set aside specific take amounts proportional to the needed energy transmission infrastructure in each ecoregion for all Covered Species (including the golden eagle) to be used only for energy transmission projects. Absent these reservations, the implementation of the DRECP risks stranding the renewable energy assets if insufficient take is available in support of supporting energy transmission facilities. Setting aside take authorizations to be used only in support of transmission projects is consistent with and furthers the goals of the DRECP.
129	Volume II	Preferred Alternative	II.3.1.8.3	Cost Evaluation Assumptions and Forecasts	II.3-285	Number and timing of projects	The time value of money affects overall implementation costs. This in turn will affect the funding requirements. If land is purchased far in the future, implementation fee revenues and other funds collected now can earn interest to help fund those purchases.	The cost of land will also increase in the future, potentially at a faster rate than the interest earned
130	Volume II	Preferred Alternative	II.3.1.8.4	Summary of Estimated Costs	II.3-286	Cost Estimate for Acquiring Compensation Lands the Preferred Alternative	Table II.3-35 through II.3-41	The per acre estimates for acquisition and management are inconsistent with real estate values - for example, costs in the Table for San Bernardino are higher than those for Los Angeles or San Diego.
131	Volume II	Preferred Alternative	II.3.1.8.5.1	DRECP Implementation Fees	II.3-292	Components of DRECP Implementation Fees		Many of the cost components, particularly for habitat restoration and enhancement, should reflect costs of actual impacts from the Covered Activity; they should not be used to compensate from the as-found state of the habitat or from other uses of the area.
132	Volume II	Preferred Alternative	II.3.1.8.5.2	State and Federal Funding	II.3-295	Federal Loan Guarantees for Multiple Species Habitat Conservation Plans	Representative Ken Calvert and Senator Dianne Feinstein have introduced the Infrastructure Facilitation and Habitat Conservation Act in Congress.	This reference and any reliance on the Infrastructure & Habitat Conservation Act should be removed since it is now the 114th Congress and the bill is no longer under consideration
133	Volume II	Preferred Alternative	II.3.2.1	BLM Renewable Energy Policies	II.3-304 to -305	DRECP Incentives	Table II.3-45	Since transmission lines are necessary to deliver electricity from new renewable generation, transmission projects should also benefit from streamlined permitting (e.g. strict schedule adherence, interagency cooperation, single point of contact, etc.) just as for renewable generation technologies, not simply making staff available to process permits (which is required for any application)
134	Volume II	Preferred Alternative	II.3.2.1.2	DRECP Variance Lands Procedures	II.3-310		DRECP Variance Lands would be available for solar, wind, and/or geothermal development. However, all applications in DRECP Variance Lands will follow the variance process described in Section B.5 of Appendix B of the Solar PEIS ROD	What is the process for transmission projects on variance lands?

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135	Volume II	Preferred Alternative	II.3.2.1.4	Existing Applications on BLM-Administered Lands	II.3-311			What is the process for transmission project applications submitted before the ROD for the DRECP is issued? Both West of Devers and Coolwater-Lugo are pre-NOA (NOI was issued in 2014). This section needs to be updated and include transmission projects for which applications have been submitted prior to the FEIR/FEIS.
136	Volume II	Preferred Alternative	II.3.2.2.1.1	Management of National Conservation Lands	II.3-317	Planning Area Wide National Conservation Land Management Direction	Transmission would be allowed in existing corridors only	Utilities will attempt to place new transmission lines within existing ROWs but that is not always possible for a variety of reasons e.g. location of substations/generators/load centers, available capacity in the existing ROW, changing demographics, etc. Given the locations of the DFAs, the EIR/EIS should provide flexibility for those instances in which use of existing ROWs are not practicable. For example, similar to the language in Site Authorizations (non-renewable energy, non-linear ROWs), the following should be added to Transmission "...must include mitigation/ compensation resulting in a net benefit to the National Conservation Land unit so that the restoration intent of National Conservation Land management is met." This would also be more consistent with the language in the first bullet on page II.3-318.
137	Volume II.3	Preferred Alternative	II.3.2.3.1	Air Resources	II.3-367	Clean Air Act (CAA) of 1970	1. Section II.3.2.3.1 Air Resources states applicable sections of the CAA include: a. NAAQS b. Control of Pollution from Federal Facilities c. Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas d. Conformity Analyses and Determinations	Suggest Adding: <b>e. New Source Review (NSR) Program Permits</b>
138	Volume II.3	Preferred Alternative	II.3.2.3.1.1	Goals and Objectives	II.3-368			The Plan-wide goals and objectives should be more descriptive to provide the broad guiding principles and define the desired outcome of the air quality resource section of the conservation strategy
139	Volume II.3	Preferred Alternative	II.3.2.3.1.2	Conservation and Management Actions For the Entire Planning Area	II.3-368		Section II.3.2.3.1.2 Conservation and Management Actions for the Planning Area states that all project authorizations within the DRECP must meet the following requirements: a. Applicable National Ambient Air Quality Standards c. State Implementation Plans d. Control of Pollution from Federal Facilities including non-point source e. Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas f. Conformity Analyses and Determinations g. Apply best management practices on a case by case basis h. Applicable local Air Quality Management Jurisdictions i. Because project authorizations are a federal undertaking, air quality standards for fugitive dust	Suggest adding: <b>b. Applicable California Ambient Air Quality Standards</b>  Suggest language change: 1. A fugitive Dust Control Plan will be developed for each project that specifies how compliance with applicable air pollution control agency's best available control measures (BACMs) (i.e. SCAQMD Rule 403) shall be achieved.

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							<p>should not exceed local standards and should be applied continuously seven days a week.</p> <p>j. Documentation for each project will require a detailed discussion and analysis of Ambient Air Quality conditions (baseline or existing), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). This content is necessary to disclose the potential impacts from temporary or cumulative degradation of air quality. The discussion will include a description and estimate of air emissions from potential construction and maintenance activities, and proposed mitigation measures to minimize net PM10 emissions. The documentation will specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. A Construction Emissions Mitigation Plan will be developed.</p> <p>k. Fugitive dust is the number one source of PM10 pollution in the Mojave and Sonoran Deserts. The proponent must model the sources of PM10 that occur prior to construction from the project area and show their timing, duration and transport on and off site of each source. Modeling will also identify how the generation and movement of PM10 will change during and after construction of the project under all alternatives.</p> <p>l. A fugitive Dust Control Plan will be developed</p>	
140	Volume II	Preferred Alternative	II.3.2.3.3.1	Cultural Resources and Tribal Interests	II.3-376	Goals and Objectives	The cultural resources GIS data will be available to analyze known and predicted site sensitivity across the DRECP.	<p>It is not clear who will be able to access the data i.e. project proponent, archaeological consultant, participating tribes? Due to the sensitivity of the data this statement should be more specific. Suggested language.</p> <p>“The cultural resources GIS data will be available to <b>qualified archaeologists</b> to analyze known and predicted site sensitivity across the DRECP. The GIS data will be available to ...”</p>
141	Volume II	Preferred Alternative	II.3.2.3.3.2	Cultural Resources and Tribal Interests	II.3-377	Conservation and Management Actions	Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of archaeological sites.	<p>Requirements should be implemented on a per project basis. All projects should not be required to implement measures that may not be applicable or that may not effectively accomplish the educational intent. Suggested language.</p> <p>“Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of archaeological sites, <b>per project as appropriate.</b>”</p>

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142	Volume II	Preferred Alternative	II.3.2.3.3.2	Conservations and Management Actions	II.3-379	Conservations and Management Actions in Development Focus Areas and Study Area Lands, and Transmission Corridors	Provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints	SCE encourages REAT to establish a process for project proponents to obtain approval to perform the required surveys before an application is submitted. This will help to streamline the process.
143	Volume II	Preferred Alternative	II.3.2.3.3.2	Conservations and Management Actions	II.3-379	Conservations and Management Actions in Development Focus Areas and Study Area Lands, and Transmission Corridors	Provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	Please provide specific criteria or examples for acceptable justification
144	Volume II	Preferred Alternative	II.3.2.3.4.2	Lands and Realty - Conservation and Management Actions	II.3-383	Conservations and Management Actions in Special Recreation Management Areas	Renewable energy projects and related ancillary facilities are not allowed. Two exceptions to this management action are (1) geothermal development would be an allowable use if a geothermal-only DFA overlays the SRMA and the lease includes a no surface occupancy stipulation, and (2) if a DRECP Variance Land designation overlays the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with the specific SRMA values	Is the intent of the first sentence to prohibit transmission infrastructure to connect to a new geothermal facility? Suggest: "Two exceptions to this management action are (1) geothermal development <b>and associated Transmission Projects</b> (or transmission lines) would be an....."
145	Volume II	Preferred Alternative	II.3.2.3.12.2	Visual Resources Management	II.3-415	Conservation and Management Actions	Ensure that transmission facilities are designed and located to meet the VRM Class objectives for the area in which they are located. Transmission lines routed through approved corridors where they do not meet VRM Class Objectives will require RMP amendments to establish a conforming VRM Objective. All reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursuing RMP amendments. This includes changes in routing, using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated June, 2008 or June, 2013) (vs. galvanized) on towers and support facilities, and employing other BMPs to reduce contrast. Such efforts will be retained even if an RMP amendment is determined to be needed.	The BMPs identified in the <i>Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands</i> include several measures that may cause additional environmental impacts if implemented, such as replacing monopoles with lattice towers. Replacement of monopoles with lattice towers could increase the disturbance area of a project, resulting in additional impacts to habitat along the transmission route.  In addition, the BMP utilizing color-treated structures may require structural and electrical testing to verify the color treatment meets SCE's standards for personal protective grounding and structural integrity.
146	Volume II	Preferred Alternative	II.3.2.3.12.2	Visual Resources Management	II.3-416	Conservation and Management Actions	Link to Best Management Practices for reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands	The link to Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands does not send the user to the correct location.

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147	Volume II	Preferred Alternative	II.3.2.3.12.2	Visual Resources Management	II.3-417	Conservation and Management Actions	Figure II.3-5 Preferred Alternative- BLM Visual Resources Management Classes	Will the document figures be available in GIS? It is difficult to verify at a parcel level the specific classes assigned to land.
148	Volume II	Preferred Alternative	II.3.2.3.12.2	Visual Resources Management	II.3-420	Required Visual resource BMPs	Lattice Towers will be located a minimum of ¾ miles away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows.	BLM's Best Management Practices for reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands notes the following: "Lattice or guyed towers are less visually obtrusive on the rural landscape than monopoles, especially when placed half a mile or more from KOPs and against a landscape backdrop." (p. 179). Suggest revising this measure to be consistent with BLM guidance. In addition, other transmission siting requirements in the DRECP may conflict with the visual resources criteria; therefore, we suggest an approach to lattice tower siting that takes into consideration all applicable criteria.  Suggested language change: <b>"To the extent feasible and depending on other DRECP siting criteria,</b> Lattice Towers will be located a minimum of <b>0.5 ¾</b> -miles away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows."
149	Volume II	Preferred Alternative	II.3.2.3.14	Wilderness Characteristics	II.3-422		"Portions of existing transmission corridors were not inventoried for lands with wilderness characteristics as part of the draft DRECP process. If new development is proposed in a designated corridor, an inventory would be completed at that time. For areas where lands with wilderness characteristics occur, mitigation at a 1:1 ratio would be required (same as DFAs)." and "Conservation and Management Actions in Development Focus Areas and Approved Transmission Corridors · Allow development in areas inventoried and identified as lands with wilderness characteristics. · Require mitigation of lands with wilderness characteristics at a 1:1 mitigation. This would be accomplished through acquisition and donation to the federal government of: (a) wilderness inholdings; (b) wilderness edge holdings that have inventoried wilderness characteristics; or (c) other areas within the Planning Area that are managed to protect wilderness characteristics. Restoration of Wilderness and Wilderness Study Area impacts could be substituted for acquisition" (page II.3-424)	In the Conservation and Management for the Entire Area section on page II.3-423, the following statement is made: "Compensation will be at a 2:1 ratio for impacts from any development that impacts wilderness characteristics." And under Conservation and Management Actions for Those Lands Identified for Management to Protect Wilderness Characteristics "Exclude these areas from ROW development." These appear to be inconsistent with the last sentence quoted above.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
150	Volume II	Preferred Alternative	II.3.2.3.14	Wilderness Characteristics	II.3-426 to -427	Table II.3-50 CDCA and DRECP Preferred Alternative Crosswalk	states that transmission/distribution facilities are not allowed	SCE has existing permitted transmission and distribution facilities located in wilderness areas that it should not be required to relocate. Please add a footnote to the table recognizing the existence of those facilities and the need to maintain, operate, refurbish, retrofit, or upgrade (and access to perform those activities).
151	Volume II	Preferred Alternative	II.3.2.3.14	Wilderness Characteristics	II.3-431	Table II.3-50 CDCA and DRECP Preferred Alternative Crosswalk	states that "non-emergency aircraft landing is not allowed"	SCE has existing permitted transmission and distribution facilities located in wilderness areas that it should not be required to relocate. Please add a footnote to the table recognizing the existence of those facilities and the need to maintain, operate, refurbish, retrofit, or upgrade (and access to perform those activities).
152	Volume III	Environmental Setting	III.20.7.1.2	Visual Resources	III.20-47	Substations	Construction of entirely new substations outside the Plan Area to accommodate power deliveries from the desert is not necessary. New transmission lines carrying power from the Plan Area would tie into existing substations.	The quoted statements are not accurate due to current lack of definitive information about where new renewable generation will actually be built. Additionally, no detailed studies were performed as part of the DRECP on the transmission necessary to support the new renewable generation. These sentences should be deleted. More detailed studies by transmission planners, such as the TTG, will be needed to consider capacity, reliability, and other relevant factors before any determination can be made regarding the need for new substations and the potential locations.
153	Volume III	Visual Resources	III.20.7.1.1	Transmission Lines	III.20-42 to III.20-47	Transmission Lines & any other DRECP section that describes routing of new transmission lines	Delivery line descriptions in various areas	The routing description of new transmission lines connecting renewable energy facilities in the Plan area to load centers and customers indicates that new transmission lines would be located adjacent to or in close proximity to existing transmission lines and within existing corridors. As described in the "Note to Readers" section in the Transmission Technical Group Report on p. iv, the new transmission lines and substations noted in the report and maps "do not reflect specific siting plans or routes." Therefore any description of new possible routes is not finite and could change. In many instances it will not be possible to locate new transmission lines adjacent to or near existing transmission lines and new corridors may be necessary.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
154	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-25	AQ-1a	Control Fugitive Dust. Prepare and comply with a dust abatement plan that addresses fugitive dust emissions during project construction and operations, in cooperation with the local air quality management district. Include provisions for monitoring fugitive dust in the abatement plan. Incorporate the following practices in the plan where applicable:	Existing language could be read to mean that all applicable practices would be applied anywhere they were applicable. For example, any practice related to a paved road would be applied where a dirt road on a project meets a paved road, which would include practices e, f, i, j. This will be impractical and unnecessarily burdensome, especially since some measures achieve the same objective.  Suggest changing to read: Control Fugitive Dust. Prepare and comply with a dust abatement plan that addresses fugitive dust emissions during project construction and operations, in cooperation with the local air quality management district. Include provisions for monitoring fugitive dust in the abatement plan. Incorporate <b>selected</b> practices from the following <b>list in the dust abatement plan in order to minimize fugitive dust:</b>
155	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-26	AQ-1a	Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas at least twice daily (or less during periods of precipitation) on days when construction occurs, to prevent dirt and debris accumulation. Sweep when dirt or runoff from construction site activities is visible on public paved roadways.	This measure seems focused on SWPPP, as opposed to fugitive dust. Suggest deleting the first sentence since this measure is not directly related to the reduction of fugitive dust. Including specific requirements like the requirement to sweep twice per day, when it may not be needed, simply a compliance requirement as opposed to a measure that provides meaningful value. If this measure is maintained, suggest revising to read:  <del>"Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas at least twice daily (or less during periods of precipitation) on days when construction occurs, to prevent dirt and debris accumulation. Sweep when dirt or runoff from construction site activities is visible on public paved roadways."</del>
156	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-27	AQ-1c	Use electric-powered equipment. Use electricity to power vehicles and equipment, and use electric vehicles or vehicles fueled by biodiesel or alternative fuels with the best available emissions controls technology during construction and operation to reduce the project's criteria and greenhouse gas pollutant emissions.	There are several issues with this measure as currently worded: 1) electric equipment is not generally available for commercial/industrial applications, 2) the ability to recharge/fuel equipment can be expensive and difficult to impossible in remote areas, 3) the cost of applying this measure could be significant, resulting in higher costs to ratepayers. As written, this measure could be read to mean that all equipment needs to be either electric powered or fueled by alternative fuel. Suggest: "Use electric-powered equipment. Use electricity to power vehicles and equipment, and use electric vehicles or vehicles fueled by biodiesel or alternative fuels with the best available emissions controls technology during construction and operation to reduce the project's criteria and greenhouse gas pollutant emissions <b>when available and appropriate, without adding to the cost of the project.</b> "

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
157	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-28	AQ-1d	Obtain emission offset credits. Emissions from construction activities on federally administered lands in federal nonattainment areas shall be mitigated to levels below applicable or de minimis levels in the general conformity rule (40 CFR 93.153) through the use of emission offset credits or by providing funding to local air districts to sponsor emission reduction projects and off-site mitigation.	Add " <b>where applicable and commercially available</b> " to this measure.
158	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-28	AQ-2b	Obtain emission offset credits for operational emissions. Emission sources due to project operations shall be mitigated through the use of emission offset credits or by providing funding to local air districts to sponsor emission reduction projects and off-site mitigation.	Add " <b>where applicable and commercially available</b> " to this measure.
159	Volume IV.2	Air Quality	IV.2.3.2.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.2-28	AQ-3a	Avoid locations near sensitive land uses. New stationary air pollution point sources such as, but not limited to, combustion sources, emergency-use engines, geothermal wells or steam vents, and cooling towers shall be located away from residential areas and other air quality-sensitive land uses.	This is a very vague mitigation measure. Please provide details and some guidance on how to apply to projects. Also, request removal of emergency-use engines as the overall contribution to air quality is low due to infrequent use.
160	Volume IV.5	Flood Hazard, Hydrology and Drainage	IV.5.3.2.1.1	Plan-wide Impacts of Implementing the DRECP: Preferred Alternative	IV.5-35 through IV.5-37	FH-1a	Develop and Implement Erosion and Sedimentation Control Plan.	The elements of this plan are duplicative of the SWPPP that is required to be prepared. Replace the Erosion and Sedimentation Control Plan with a SWPPP that is reviewed and approved by the appropriate storm water control board.
161	Volume IV	Environmental Effects Analysis	IV.6	Groundwater, Water Supply, and Water Quality	IV.6-39	GW-1a	"GW-1a. Improve Groundwater Recharge. The developer shall install pervious groundcover and direct drainage from impervious surfaces to a common pervious drainage basin that maximizes groundwater basin recharge."	This measure may be problematic to implement due to the following concerns: 1) Pervious groundcover could interfere with the structural integrity of the installed equipment. 2) Projects may have limited area to construct a drainage basin, where also vector control abatement, liability issues, O&M costs would need to be considered. 3) May increase sedimentation that violate provisions under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (2009-0009-DWQ)  Suggested language change: "GW-1a. Improve Groundwater Recharge. <b>Where structurally and hydrologically feasible and consistent with regulations and project permits</b> , the developer shall install pervious groundcover and direct drainage from impervious surfaces to a common pervious drainage basin that maximizes groundwater basin recharge."

Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
162	Volume IV	Environmental Effects Analysis	IV.6	Groundwater, Water Supply, and Water Quality	IV.6-39	GW-2b	<p>"GW-2b. Develop Mitigation Action Plan for Drawdown. The Mitigation Action Plan shall specify actions if drawdown thresholds are reached in water supply wells, monitoring wells, or wetlands, surface waters, and groundwater-dependent vegetation areas. Actions for impacts on wells include compensation for increased power costs, well modifications and repair, well replacement, and actions to protect wetlands, surface waters and vegetation. These can also include pumping reduction or cessation, and providing an alternative water supply."</p> <p>This measure will be problematic to implement for the following reasons: for linear construction projects, this may be impractical as the project could transverse multiple basins; for all projects, various sources could be utilizing the same aquifer; limited information on aquifers is available in terms of monitoring wells that are in operation by the State and County. DRECP will need to coordinate aquifer monitoring with state and local water authorities to ensure accurate information is provided. Suggest:  "GW-2b. Develop Mitigation Action Plan for Drawdown. <b>The developer shall contact the Department of Water Resources to determine if any information on ground water monitoring is available on the [ground water] aquifer(s) that could be affected by the proposed project and if drawdown thresholds should be established. If DWR identifies the need for a drawdown threshold, a mitigation action plan shall be developed.</b> The Mitigation Action Plan shall specify actions if drawdown thresholds are reached in water supply wells, monitoring wells, or wetlands, surface waters, and groundwater-dependent vegetation areas. Actions for impacts on wells include <del>compensation for increased power costs</del>, well modifications and repair, well replacement, and actions to protect wetlands, surface waters and vegetation. These can also include pumping reduction or cessation, and providing an alternative water supply."</p>
163	Volume IV	Environmental Effects Analysis	IV.6	Groundwater, Water Supply, and Water Quality	IV.6-40	GW-4a	<p>"GW-4a. Develop Mitigation Action Plan to Protect Groundwater Quality. The developer shall identify actions to be taken if water quality thresholds are reached that include restrictions on project water use and compensation to adjacent landowners for impacts resulting from water quality changes."</p> <p>This measure is redundant as this mitigation measure is already covered via CEQA and NEPA. Not all of the listed mitigation measures would be appropriate for each project or landowner. Suggest:  "GW-4a. Develop Mitigation Action Plan to Protect Groundwater Quality. The developer shall identify actions to be taken if water quality thresholds are reached that include restrictions on project water use and <b>may involve</b> compensation to adjacent landowners for impacts resulting from water quality changes."</p>
164	Volume IV	Biological Resources	IV.7.1.1.1	Siting, Construction, and Decommissioning Impacts	IV.7-4	Covered Species	<p>Golden eagle: Avoidance of known golden eagle nests with a setback of 1 mile.</p> <p>This should be modified to include the 0.5 mile buffer for nests that do not have line of sight to activities. Suggest:  "Golden eagle: Avoidance of known golden eagle nests with a setback of 1 mile <b>or 0.5 miles for known golden eagle nests that are not within a direct line of sight to siting, construction, or decommissioning activities</b>".</p>
167	Volume IV	Biological Resources	IV.7.2.1.3	Impacts of Operations and Maintenance	IV.7-43	Transmission Lines	<p>Studies suggest that the majority of collisions smallest diameter wire shield wire located at the top of transmission lines (APLIC 2012; Saverno et al. 1996).</p> <p>"Studies suggest that the majority of collisions <b>occur with the</b> smallest diameter wire (<b>called the shield wire</b>) located at the top of transmission lines (APLIC 2012; Saverno et al. 1996)."</p>
166	Volume IV	Biological Resources	IV.7.2.1.3	Impacts of Operations and Maintenance	IV.7-43	Transmission Lines	<p>Larger species, such as raptors, are more susceptible to collision because they are less maneuverable and have large wing spans.</p> <p>Please provide the citation for this statement. SCE's experience is that this is actually not typically the case. Raptors are less susceptible because they can maneuver better. Large, heavy-bodied birds (waterfowl for example) are more susceptible to collisions. Page 30, APLIC 2012.</p>

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167	Volume IV	Biological Resources	IV.7.2.1.3	Impacts of Operations and Maintenance	IV.7-44	Transmission Lines	Further, because raptors and other large aerial perching birds often perch on tall structures that offer broad outlooks for potential prey, the design of transmission poles or towers can be a major factor in the risk of electrocution (APLIC 2006).	Electrocution with transmission is actually less likely because of the wider spacing (APLIC 2006) between conductors on transmission lines of 220 kV or higher. Transmission lines with voltages less than 220 kV can be designed to be consistent with APLIC guidance.
168	Volume IV	Biological Resources	IV.7.2.1.3	Impacts of Operations and Maintenance	IV.7-44	Electrocution	Electrocution can also occur when birds perched side-by-side span the distance between circuits (APLIC 2012). Current guidelines for constructing power lines have been developed to minimize the potential effects from bird strikes and electrocution (APLIC 2012).	Please use the correct citation. APLIC 2006 is the electrocution manual, APLIC 2012 addresses collisions.
169	Volume IV	Biological Resources	IV.7.3.1.1.1	Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative	IV.7-94	Transmission	Each project would require an avian protection plan that would require the implementation of avoidance, minimization, and compensation measures to offset likely collision impacts.	An Avian Protection Plan is a specific type of plan that is applied to an entity's overall program for managing avian issues and is not intended to be developed for individual projects, i.e., APPS are meant as company-wide documents (USFWS and APLIC 2005). Project-specific documents should avoid using titles that may cause confusion. Recommend referring to project-specific plans as "Avian Mitigation and Monitoring Plans or equivalent."
170	Volume IV	Biological Resources	IV.7.3.1.2	Impacts on BLM Lands of Existing BLM Land Use Plans in No Action Alternative	IV.7-144	Transmission	Development of lines would follow recommendations of APLIC, where feasible, Avian protection plan would be developed for each project on a project by project basis.	An Avian Protection Plan is a specific type of plan that is applied to an entity's overall program for managing avian issues and is not intended to be developed for individual projects, i.e., APPS are meant as company-wide documents (USFWS and APLIC 2005). Project-specific documents should avoid using titles that may cause confusion. Recommend referring to project-specific plans as "Avian Mitigation and Monitoring Plans or equivalent."
171	Volume IV	Biological Resources	IV.7.3.1.2	Impacts on BLM Lands of Existing BLM Land Use Plans in No Action Alternative	IV.7-144	Transmission	Under the No Action Alternative, projects would be analyzed on a case-by-case basis and preparation and implementation of plans that detail avoidance, minimization, and compensation measures, are expected to address and offset collision impacts to Non-covered bird and bat species.	Bat species are not known to be at risk for collisions with transmission lines. Provide a citation for peer-reviewed scientific basis.
172	Volume IV	Biological Resources	IV.7.3.1.4	Impacts of General Conservation Plan in No Action Alternative	IV.7-191	Transmission	Each project would require an avian protection plan that would require the implementation of avoidance, minimization, and compensation measures to offset likely collision impacts.	An Avian Protection Plan is a specific type of plan that is applied to an entity's overall program for managing avian issues and is not intended to be developed for individual projects, i.e., APPS are meant as company-wide documents (USFWS and APLIC 2005). Project-specific documents should avoid using titles that may cause confusion. Recommend referring to project-specific plans as Avian Mitigation and Monitoring Plans or equivalent.
173	Volume IV	Biological Resources	IV.7.3.1.6.1	Impacts of Transmission Outside of Plan Area	IV.7-208	Impact BR-6	However, fatal collisions with transmission lines could disrupt bird and bat movement or migration during operation (see Impact BR-9 for detailed discussion of collision risks).	Bat species are not known to be at risk for collisions with transmission lines. Provide a citation if known otherwise.

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174	Volume IV	Biological Resources	IV.7.3.2.1.1	Plan-Wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.7-241	Golden Eagle	Implementation of the CMAs for golden eagles (AM-DFA-ICS-2) would prohibit siting or construction of Covered Activities within 1 mile of an active golden eagle nest; therefore, impacts within 1 mile of these golden eagle territories would be avoided.	This should not include transmission lines since it is possible to design and construct transmission lines to be safe for golden eagles. Suggest "Implementation of the CMAs for golden eagles (AM-DFA-ICS-2) would prohibit siting or construction of Covered Activities within 1 mile of an active golden eagle nest within an active golden eagle territory <b>or a 0.5-mile buffer will be used for active nests that are not within line of sight of project activities (see Appendix H).</b> Therefore, impacts within the <b>identified buffers</b> would be avoided."
175	Volume IV	Biological Resources	IV.7.3.2.1.1	Plan-Wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.7-276	Transmission	These actions aim to avoid and minimize direct mortality of birds and bats from the operation of transmission projects.	Bats are unlikely to have direct mortality from collisions with transmission lines.
176	Volume IV	Biological Resources	IV.7.3.2.1.1	Plan-Wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.7-276	Transmission	A bird mortality monitoring program will be implemented during operations using current protocols and best procedures available at time of monitoring.	A risk assessment should be performed to determine whether a mortality monitoring program is necessary project by project.
177	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-43	CR-1a c)	c) Require that surface disturbances be restricted or prohibited within the viewshed of an NRHP/CRHR-eligible resource if the eligibility of that resource is based upon its visual setting.	As currently stated measure cannot be implemented because it does not allow project construction when an eligible resource is present. Mitigation of the resource is not provided as an option for project construction. Suggest language change:  c) <b>When feasible</b> , surface disturbances should be restricted or prohibited within the viewshed of an NRHP/CRHR-eligible resource if the eligibility of that resource is based upon its visual setting.
178	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-43	CR-1a e)	e) Employ the use of cultural resource monitors during ground disturbing activities when field conditions merit.	Monitoring during ground disturbing activities is a condition based on the presence and type of resource and not field conditions. Suggest language change:  e) Employ the use of cultural resource monitors during ground disturbing activities when <b>field conditions merited by the resource</b> .
179	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-44	CR-1a h)	h) Require the preservation or reuse of an eligible structure to follow the DOI's Standards and Guidelines for Archeology and Historic Preservation. If the building is considered a historical resource under CEQA, the local building inspector must grant code alternatives under the State Historic Building Code.	As currently stated measure cannot be implemented because it does not allow project construction when an eligible structure is present. Mitigation of the resource is not provided as an option for project construction. Suggest language change:  h) When the preservation or reuse of an eligible structure is feasible, the DOI's Standards and Guidelines for Archeology and Historic Preservation <b>should be followed</b> . If the building is considered a historical resource under CEQA, the local building inspector must grant code alternatives under the State Historic Building Code.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
180	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-44	CR-2a a)	c) Employ Native American and/or cultural resource monitors during ground-disturbing activities when field conditions merit.	Native American or cultural resource monitoring is a condition based on the presence and type of resource and not field conditions. Suggest language change: c) Employ Native American and/or cultural resource monitors during ground-disturbing activities when <del>field conditions merit</del> <b>merited by the resource.</b>
181	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-45	CR-2a d)	d) Require that surface disturbances be restricted or prohibited within the viewshed of an NRHP/CRHR-eligible resource if the eligibility of that resource is based upon its visual setting.	As currently stated measure cannot be implemented because it does not allow project construction when an eligible resource is present. Mitigation of the resource is not provided as an option for project construction. Suggest language change: d) <b>When feasible</b> , surface disturbances should be restricted or prohibited within the viewshed of an NRHP/CRHR-eligible resource if the eligibility of that resource is based upon its visual setting.
182	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-45	CR-2a f)	f) Conduct analyses to determine the impact of vibration from ground disturbance activities (such as geotechnical boring) on the structural integrity of built-environment resources and prehistoric resources such as rock art.	This section is related to archaeological resources only. Not built environment. Suggest language change: f) Conduct analyses to determine the impact of vibration from ground disturbance activities (such as geotechnical boring) on <del>the structural integrity of built environment resources and</del> prehistoric resources such as rock art.
183	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-45	CR-2a h)	h) Establish conservation easements where individual resources could be preserved.	Measure is not clear and it is open to interpretation. As currently stated it is not evident what will trigger this type of measure and who would be responsible for implementation. Suggest language change: h) Establish conservation easements where individual resources could be preserved <b>when feasible</b> .
184	Volume IV	Cultural Resources	IV.8	Mitigation Measures for Impacts	IV.8-46	CR-3a b)	b) Employ the use of cultural resource monitors, including Native Americans, during ground-disturbing activities when field conditions merit it.	Native American or cultural resource monitoring is a condition based on the presence and type of resource, <u>not</u> field conditions. Suggest language change: b) Employ Native American and/or cultural resource monitors during ground-disturbing activities when <del>the resource field conditions merit</del> <b>merited by the resource.</b>
185	Volume IV	Native American Interests	IV.9	Mitigation Measures for Impacts	IV.9-35	na	-Survey, identify and record new cultural resources within ACEC boundaries. -Update records for existing cultural resources within ACECs.	These statements are vague. It should specify that the analysis within the ACEC are required for areas that have the potential to be affected by the project only. Conducting studies of an entire ACEC for small projects may not be feasible.

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186	Volume IV	Native American Interests	IV.9	Mitigation Measures for Impacts	IV.9-36	TL-1a	Employ tribal monitors during cultural resource surveys and ground disturbing activities.	Native American monitoring is a condition based on the presence of prehistoric resources. Native American monitoring should not be required if no prehistoric resources are present. The presence of native American monitors during surveys should be considered only when feasible. Suggest language change:  Employ tribal monitors during cultural resource surveys and ground disturbing activities <b>when merited by the resource; and employ tribal monitors during surveys when feasible.</b>
187	Volume IV	Native American Interests	IV.9	Mitigation Measures for Impacts	IV.9-37	TL-1a	-Conduct biological or hydrologic analyses. -Avoid and buffer critical habitat areas, vegetation stands, and nesting areas. -Restrict the introduction and disposal of non-native species into areas of native habitat, suitable habitat, and natural or artificial bodies of water. -Direct nighttime lighting away from animal habitats and shield light to focus only downward. -Implement construction standards that would prevent toxic chemicals from entering waterways, minimize the chance of hazardous spills, and implement measures to prevent excessive and man-made soil deposition and erosion.	Most of these measures do not appear to be related to tribal resources. If the intent is to protect areas used by Native Americans to gather native plants, then measure should be limited to plant resources and the other bullets deleted. Suggest language change:  <b>Restrict the introduction and disposal of non-native species into areas of native habitat, suitable habitat, and natural or artificial bodies of water.</b>
188	Volume IV	Native American Interests	IV.9	Mitigation Measures for Impacts	IV.9-37, 38	TL-2	Mitigation Measures for Impact TL-2: Costs associated with the participation in environmental documents required by the Plan would be disproportionately borne by tribal governments and organizations.  TL-2a Provide Support to Tribal Governments. Project proponents shall provide support tribal participation in the CEQA and NEPA process (consultation, ethnography, document review, monitoring, repatriation, access of sacred sites) including: -Fees for ethnographic interview and consultation. -Travel costs. -NEPA, CEQA, and NHPA Section 106 training for tribal personnel. -Funds to hire and train additional environmental staff to review documents. -Equipment such as computers and relevant training for tribal personnel in their use -High-speed Internet access and relevant training for tribal personnel in its use and maintenance.	Measure does not provide specific details on what triggers the project proponent to provide this support nor does it establish a process for determining the amount of support proponent would be required to provide. As stated the measure could be cost-prohibitive and infeasible. Many tribes already have trained staff or programs in place for several of the items listed. Suggest: "TL-2a Provide Support to Tribal Governments. Project proponents <del>shall</del> <b>should</b> provide support for tribal participation in the CEQA and NEPA process (consultation, ethnography, document review, monitoring, repatriation, access of sacred sites) <b>may include including</b> : -Fees for ethnographic interview and consultation. -Travel costs. -NEPA, CEQA, and NHPA Section 106 training for tribal personnel. -Funds to hire and train additional environmental staff to review documents. -Equipment such as computers and relevant training for tribal personnel in their use -High-speed Internet access and relevant training for tribal personnel in its use and maintenance.

	Document Number	Document Title	Section	Section Title	Page	Item/Paragraph	Language	Comment
189	Volume IV		IV.11.3.1.5.1	Impacts Outside the Plan Area in No Action Alternative	IV.11-18	Transmission impacts outside the Plan Area	Transmission corridors outside the Plan Area are anticipated to be in the same ROWs as existing high-voltage transmission lines or adjacent to or near these existing lines.	Utilities will often attempt to place new transmission lines within existing ROWs but that is not always possible for a variety of reasons e.g. location of substations/generators/load centers, available capacity in the existing ROW, changing demographics, etc. Additional studies focused on transmission planning are needed to provide meaningful information on potential transmission corridors in the DRECP
190	Volume IV.12	Agricultural Land and Production	IV.12.3.2.1.1	Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.12-17	AG-1b, AG-1c	<p>AG-1b, f) Decommissioning - The ARPP shall also outline requirements for mulch and/or cover crops to be used after decommissioning. The plan shall outline performance standards for site soils after removal of structures and facilities. These performance standards shall include physical and chemical properties of the soil, which shall be tested by a soil scientist approved by the county and submitted to the county for approval before any funds (described in Mitigation Measure AG-1[b]) may be released by the county.</p> <p>AG-1c, 3rd paragraph - Prior to commencement of construction or ground-disturbing activities, the Permittee shall also provide appropriate funds (as determined by the DRECP coordination group[s]) to compensate for reasonable administrative costs incurred by the easement holder, including an endowment to cover the cost of monitoring and enforcing the easement in perpetuity.</p>	<p>1. This MM should not be applied to the transmission or substation components of the project. Typically transmission components, including substations will be in place for 100+ years. As such, the expectation that the land will return to farm land is not reasonable in the foreseeable future. The expectation should be that the land is permanently converted to non-agriculture use.</p> <p>2. The reference noted in this statement: "(described in Mitigation Measure AG-1b)" is incorrect. It should read: "(described in Mitigation Measure AG-1c)"</p> <p>3. This section refers to the release of funds by the county, "These performance standards shall include physical and chemical properties of the soil, which shall be tested by a soil scientist approved by the county and submitted to the county for approval before any funds (described in Mitigation Measure AG-1[b]) may be released by the county." However, when reviewing mitigation measure AG-1c, there is no discussion about releasing funds. Please correct.</p>
191	Volume IV.12	Agricultural Land and Production	IV.12.3.2.1.1	Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.12-17, 18	AG-1b, AG-1c	<p>AG-1b Develop an Agricultural Resources Protection Plan. The Permittee shall develop an Agricultural Resources Protection Plan (ARPP) in consultation with the appropriate county's Agricultural Advisory Committee, to be reviewed by a professional agronomist approved by the county.</p> <p>AG-1c Compensate for loss of Important Farmland. If Important Farmland is converted to nonagricultural use and no off-site habitat acquisition for agriculture-dependent Covered Species is required, the permittee shall mitigate for the loss of farmland through permanent preservation of off-site farmlands.</p>	MM AG-1b requires that an ARPP be developed for any Important Farmland that will be converted to a nonagricultural use. This measure essentially requires that the land be preserved, maintained and returned to agricultural use following decommissioning. MM AG-1c requires that Important Farmland that will be converted to nonagricultural use be compensated for through purchase of other land that is permanently preserved for agricultural purposes. This would appear to be mitigating for the same impact twice. Consider revising to require only one of these two measures.

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192	Volume IV.21	Noise and Vibration	IV.21.3.2.1.1	Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development	IV.21-28	NV-1b	Ensure all project equipment has the appropriate sound-control devices and shield-impact tools. Use battery-powered forklifts and other facility vehicles and flashing lights instead of audible backup alarms on mobile equipment.	Many companies have employed the use of backup alarms on mobile equipment, including vehicles, as a means to warn people in the area of a backing vehicle or equipment. Although strobe lights provide some level of protection, they are not considered a replacement for an audible alert. As such, it is recommended that the following be removed because personnel safety is a higher priority than the temporary noise impact: "and flashing lights instead of audible backup alarms on mobile equipment"
193	Volume VI	MMCRP	VI	MITIGATION MONITORING AND REPORTING PLAN	VI-1	1	"The information, issues, and mitigation strategies developed during the EIR/EIS process will be used, considered, evaluated, and disclosed in any subsequent environmental documents that are prepared to implement the DRECP and in the review and approve of individual projects within the Plan Area."	"The information, issues, and mitigation strategies developed during the EIR/EIS process will be used, considered, evaluated, and/or disclosed in any subsequent environmental documents that are prepared to implement the DRECP and in the review and approval of individual projects within the Plan Area."
194	Volume VI	MMCRP	VI	MITIGATION MONITORING AND REPORTING PLAN	VI-1	3	"Projects, activities, and decisions implemented under the DRECP would be overseen by the agencies having jurisdiction over affected lands and resources."	"Projects, activities, and decisions implemented under the DRECP would be overseen by the <b>lead agency, as well as any</b> agencies having jurisdiction over affected lands and resources."
195	Appendix H	Conservation and Management Actions Documentation	H.2.7	Swainson's Hawk Active Nests Setback Areas	H-15	x	x	SWHA 0.5 mile setback is larger than needed and appears to be required even outside the nesting season - a nest should only be considered active if there is breeding activity or eggs or young in the nest. Suggest: "A nest will be considered potentially occupied if it was used one or more times in the last five years, impacts to nest will be avoided at all times."
196	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-19	Introduction	The Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) are evaluating authorizing incidental take of golden eagles in the DRECP through the NCCPA, ESA, and the Bald and Golden Eagle Protection Act (Eagle Act), as appropriate.	Consider including the use of eagle nest disturbance permits that are available through USFWS, but not through CDFW. Temporarily blocking inactive nests will allow project activities to proceed while minimizing impacts to nesting eagles. Delete CDFW from the parenthetical phrase
197	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-35	Power line electrocution	Power line electrocutions are estimated to cause between 6 and 10 golden eagle mortalities in the DRECP area each year.	What is the source of these numbers? This does not reflect SCE's mortality data in the DRECP area that dates back to the 1980s. Our mortality tracking shows 6 to 10 eagles over 15 years in the plan area. Given SCE's patrolling practices and the persistence of eagle carcasses on the landscape, this number seems like a large overestimate.
198	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-36	Power line electrocution	Sources: Southern California Edison	What information did we provide? Not the estimated mortality.

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199	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-41	An Example of Compensation for Take of Golden Eagles	The USFWS's REA for retrofitting power poles incorporates the current understanding of eagle life history inputs, effectiveness of retrofitting high-risk electric power poles, the expected annual take, and the timing of both the eagle take permit and implementation of compensatory mitigation. As would be expected, the estimated number of eagle fatalities and the permit renewal period affect the overall number of poles that would need to be retrofitted to offset impacts. Delays in implementation of pole retrofitting would lead to more poles retrofits being required.	The pole retrofit mitigation option is limited by the number of unsafe poles in a given area. Ongoing utility efforts to replace old infrastructure with avian-safe poles reduce the number of unsafe poles available for future replacement. Suggest focusing golden eagle mitigation on other conservation efforts.
200	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-43	An Example of Compensation for Take of Golden Eagles	The example above is a practical application of the mitigation approach for golden eagles. Costs borne by the applicant will be assured by payment of mitigation requirements occurring before project impacts can begin.	APLIC has produced a document that should be referenced here: Developing Power Pole Modification Agreements for Compensatory Eagle Mitigation for Wind Energy Projects (2014).
201	Appendix H	Conservation and Management Actions Documentation	H.2.11	Approach to Golden Eagle Coverage	H-43	An Example of Compensation for Take of Golden Eagles	Eagle Take Authorization Process Steps:	This process should be modified to take into account temporary disturbance of a nest permit types.
202	Appendix H	Conservation and Management Actions Documentation	H.3.2	Approach to Determining Compensation	H-59	Table H-4b	X	Please justify the ratio for the transmission activities for DT of 5:1. Typically a 3:1 ratio has been required.
203	Appendix H	Conservation and Management Actions Documentation	H.3.2	Compensation Ratio Exceptions	H-70	Threat Reduction Compensation	Retrofitting or undergrounding transmission lines - Power line retrofitting following current Avian Power Line Interaction Committee (APLIC) standards in the Plan Area could reduce the risk of future electrocutions and undergrounding transmission lines would remove the threat.	They are not "standards" but rather guidance.
204	Appendix H	Conservation and Management Actions Documentation	H.4.2	Estimated Biological Compensation for each DRECP Alternative	H-71	Estimated Compensation for Siting, Construction, Decommissioning, and Terrestrial Operational Impacts	Table H-8 provides the estimated compensation (acquisition-based) for siting, construction, decommissioning, and terrestrial operational impacts for the DRECP Alternatives by ecoregion subarea using the compensation approach described in H.3.1 and H.3.2.	In the earlier phases of the project, compensation is provided for the construction and operation. Compensation for decommissioning activities should be based only on the additional/incremental area affected by those activities that has not previously been affected by either construction or operation of the facility/transmission line. Compensation for decommissioning activities should also reflect the temporary nature of the disturbance.
205	Appendix K	Transmission Technical Group Rpt	Acknowledgements	Note To Readers	iv	1	"Section 4.5 of this report identifies specific new transmission line segments that would be needed to accommodate renewable energy generation that could be developed in each DRECP alternative. ... "	"Section 4.5 of this report identifies specific <b>conceptual locations for new transmission line segments (the precise location and configuration of which would be identified in subsequently-filed specific project proposals)</b> that would be needed to accommodate renewable energy generation that could

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								be developed in each DRECP alternative. ... "
206	Appendix K	Transmission Technical Group Rpt	Acknowledgements	Note To Readers	iv	2	"...This is a conceptual transmission plan for the alternatives and is not intended to be a siting exercise. Thus, the line segments represent only the electrical connections (i.e., the end-points of line segments) and do not reflect specific siting plans or routes. However, the Garamendi principles were used when constructing these maps and thus the lines were drawn to follow existing rights-of-way wherever possible. The new transmission lines identified through this exercise have not been evaluated for their specific locations, constructability, desirability, cost, or likelihood of their successful permitting. They also have not been studied by transmission planning groups to identify reliability concerns or effects on other transmission systems. ..."	Cut and paste this edited language into various sections [TBI - ES, Vols 1-3]. Edit as follows: "...This is a conceptual transmission plan for the alternatives and is not intended to be a siting exercise. Thus, the line segments represent only the electrical connections (i.e., the end-points of line segments) and do not reflect specific siting plans or routes. However, the Garamendi principles were used when constructing these maps and thus the lines were drawn to follow existing rights-of-way wherever possible. The new transmission lines identified through this exercise have not been evaluated for their specific locations, constructability, desirability, cost, or likelihood of their successful permitting. They also have not been studied by transmission planning groups to identify reliability concerns or effects on other transmission systems. <b>It is presumed that the precise location and configuration of needed transmission infrastructure would be identified and environmentally evaluated via subsequently-filed specific project proposals which, to the extent possible, tier off of the environmental analyses performed in support of the DRECP. Thus, as a practical matter, while the identified transmission lines are presumed to be necessary in support of the DRECP, the ultimate location and configuration of these transmission lines should <i>not</i> be assumed to be as preliminarily identified herein.</b> "
207	Appendix K	Transmission Technical Group Rpt	1	Executive Summary	1	1, 2 and 3	References to "Transmission Impacts in the DRECP" (April and June 2012 versions); "Description and Comparative Evaluation of Draft DRECP Alternatives" (December 2012).	Referenced reports should be within administrative record.

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208	Appendix K	Transmission Technical Group Rpt	1	Executive Summary	3	1	<p>"This effort is not intended to identify specific new transmission lines or routes, or to replace the utilities' transmission planning processes, which would normally include power flow studies and stability studies. The conceptual transmission plan and associated acres of impact are based on the professional judgment of experienced transmission planners representing the major utilities from across the state."</p>	<p>"This effort is not intended to identify specific new transmission lines or routes, or to replace the utilities' transmission planning processes, which would normally include power flow studies and stability studies. <b>This is a conceptual transmission plan for the alternatives and is not intended to be a siting exercise. Thus, the line segments represent only the potential electrical connections (i.e., the end-points of line segments) and do not reflect specific siting plans or routes. However, the Garamendi principles were used when constructing these maps and thus the lines were drawn to follow existing rights-of-way wherever possible. The potential new transmission lines identified through this exercise have not been evaluated for their specific locations, constructability, desirability, cost, or likelihood of their successful permitting. They also have not been studied by transmission planning groups to identify reliability concerns or effects on other transmission systems. It is presumed that the precise location and configuration of needed transmission infrastructure would be identified and environmentally evaluated via subsequently-filed specific project proposals which, to the extent possible, tier off of the environmental analyses performed in support of the DRECP. Thus, as a practical matter, while the identified transmission lines are presumed to be necessary in support of the DRECP, the ultimate location and configuration of these transmission lines should not be assumed to be as preliminarily identified herein</b>" The conceptual transmission plan and associated acres of impact are based on the professional judgment of experienced transmission planners representing the major utilities from across the state."</p>

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209	Appendix K	Transmission Technical Group Rpt	2	Introduction & Background	8	4	"This effort is not intended to identify specific new transmission lines, identify specific routes, or to replace the utilities' transmission planning processes. This analysis is also neutral regarding ownership of generation projects and transmission facilities."	"This effort is not intended to identify specific new transmission lines, identify specific routes, or to replace the utilities' transmission planning processes. [This is a conceptual transmission plan for the alternatives and is not intended to be a siting exercise. Thus, the potential line segments represent only the electrical connections (i.e., the end-points of line segments) and do not reflect specific siting plans or routes. However, the Garamendi principles were used when constructing these maps and thus the lines were drawn to follow existing rights-of-way wherever possible. The potential new transmission lines identified through this exercise have not been evaluated for their specific locations, constructability, desirability, cost, or likelihood of their successful permitting. They also have not been studied by transmission planning groups to identify reliability concerns or effects on other transmission systems. It is presumed that the precise location and configuration of needed transmission infrastructure would be identified and environmentally evaluated via subsequently-filed specific project proposals which, to the extent possible, tier off of the environmental analyses performed in support of the DRECP. Thus, as a practical matter, while the identified potential transmission lines are presumed to be necessary in support of the DRECP, the ultimate location and configuration of these transmission lines should not be assumed to be as preliminarily identified herein" This analysis is also neutral regarding ownership of generation projects and transmission facilities."
210	Appendix K and elsewhere	Transmission Technical Group Rpt		Transmission and Substation Terminology	iii, 15, 16	Collector lines	¾ Collector Lines – Collector lines are used to connect generation projects to collector substations. Depending on the size of the generation project, these lines can be 34.5 kV, 66 kV, or 230 kV. Collector lines are sometimes called generator interconnection lines, or "gen-tie" lines.	Collector lines are <u>not</u> considered generator interconnection or gen-tie lines. Collector lines generally are all located on the generator's site. By comparison, connector lines provide the link between collector substations and the rest of the grid and as such, are considered generator interconnection or gen-tie lines. This should be corrected throughout the document.
211	Appendix K	Transmission Technical Group Rpt		Transmission and Substation Terminology	II-3-197 to 201	Table II.3-29 Description of Activities Associated with Transmission, Substations, and Generator Tie Lns	34.5 and 66 kV Collector Lines – 34.5 and 66 kV collector lines connect generation projects less than or equal to 100 MW to substations. All 66 kV lines are assumed to be 10 miles (52,800 feet) long and to have a ROW (width) requirement of 30 feet with no access road requirement, for standard affected acreage of 36 acres. The 30 foot ROW accommodates both single circuit and double circuit lines and assures maximum utilization of facilities within the ROW.	All transmission lines require access roads for routine O&M activities. Suggest: "34.5 and 66 kV Collector Lines – 34.5 and 66 kV collector lines connect generation projects less than or equal to 100 MW to substations. All 66 kV lines are assumed to be 10 miles (52,800 feet) long and to have a ROW (width) requirement of 30 feet with <del>no</del> access road <b>assumed to be no more than 24 feet wide requirement</b> , for standard affected acreage of <del>36</del> acres. The <del>30-54</del> foot ROW accommodates both single circuit and double circuit lines and <b>access road and</b> assures maximum utilization of facilities within the ROW."

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212	Appendix K	Conceptual Transmission Plan for DRECP Alternatives	Figure 1-5 & No action alternative figure	Figures	45	Legend	Legend for Figures 1-5 and No Action Alternative figure	For the "Transmission Lines" legend, it is not clear that the figure only includes new transmission lines. Suggest changing the legend title from "Transmission Lines" to " <b>New Potential Transmission Lines</b> ".
213	Appendix K Transmission Technical Group Report	TTG Report	Figures 1-7	Alternative Maps and Delivery Line Maps	PDF 45-51		Maps show the conceptual transmission lines that were used by the TTG to calculate the affected acreage needed to accommodate the 20,000+ MW of the DRECP's DFAs.	SCE would like the DRECP to emphasize that the transmission line and substation locations shown on the Transmission Technical Group (TTG) Report maps and other Draft DRECP maps were only used as means to approximate the acreage needed for transmission facilities to accommodate the DRECP's DFAs in each alternative. These "conceptual" lines are not "proposed" lines and all of the disclaimers in the "Note to Readers" section on p. iv in the TTG report apply.