

The following table provides technical non-substantive corrections to the Service’s Draft Environmental Assessment (draft EA) for the Cross Valley Loop Transmission Line Habitat Conservation Plan (HCP). These corrections are being incorporated into the Service’s Final EA for the HCP (strikethrough elements are deletions and underlined elements are additions).

	<b>Page</b>	<b>Revision</b>
1	2-15, second paragraph, fourth sentence	Recommend the following revision for consistency with the HCP: “[T]he existing Big Creek Rebuild Transmission Line is located within the proposed HCP Permit Area. <u>The HCP Covered Activities include SCE’s future transmission-line O&amp;M activities within the HCP Permit Area, including those associated with the existing Big Creek Rebuild Transmission Line.</u> ”
2	2-21, third paragraph	This paragraph, which addresses drainage systems, appears to be out of place and is repeated on the following page under the correct section heading. Recommend deleting this paragraph where it appears on page 2-21.
3	2-19, last paragraph	This section discusses LST replacement, not conductor repair. Recommend the following revisions for clarity: “LST replacement activities would primarily use most of the structure work area. Based on <del>their</del> <u>its</u> experience with new LSTs on other transmission lines, SCE estimates that <del>up to two 1,200-footlong segments of conductor would be repaired</del> <u>one LST would require replacement</u> during the proposed permit term, and <del>SCE will assume that the LST replacement occurs to an LST which may be</del> <u>located east of the Friant–Kern Canal.</u>
4	2-20, third paragraph	This section should include the information about conductor repair that was discussed above on page 2-19. Recommend adding the following sentence to the end of the paragraph: “A major conductor repair would remove and replace a damaged conductor. . . <u>SCE estimates that up to two 1,200 footlong segments of conductor would be repaired in the HCP Permit Area during the permit term.</u> ”
5	2-53, second paragraph	This statement refers to two technical papers, System Strength and Short Circuit Duty (SCD)/Short Circuit Ratio (SCR) Analysis and San Joaquin Cross Valley Loop Project Supplemental Routing Analysis, which the EA states are presented in Appendix B of the EA. These papers are not currently included in Appendix B. Appendix B is “Biological Resources – Species Potential to Occur Tables.” SCE has enclosed these technical papers with this letter.
6	6-23, fourth paragraph	We recommend the following revisions to clarify the significance finding for Impact HYD-5: “Therefore, the habitat functions of vernal pools in graded work areas, even if restored to natural vegetation, would be considered permanently lost, resulting in an <del>significant</del> <u>adverse</u> impact to 0.28 acre of vernal pool/swale features. <u>However, these impacts will be less than significant and not adverse with the mitigation measures and AMMs described in this EA and the HCP.</u> ”
7	7-29, last paragraph, second	This sentence inadvertently omits the word “not.” The sentence should be revised to read: “With incorporation of the conservation strategy, the Service determines that these effects would <u>not</u> have a substantial adverse effect . . .”

	Page	Revision
	sentence	
8	8-1, second paragraph, first sentence	This chapter is about Special Status Species. We recommend that this sentence should be revised to read: “For the purposes of this analysis, the study area for direct and indirect impacts to <del>land covers and common</del> <u>special-status</u> species comprises the HCP Permit Area.”
9	8-24, first paragraph, first sentence	Recommend the following revisions for consistency with the HCP: “Construction Covered Activities <del>would not</del> <u>could</u> result in permanent direct effects to California tiger salamanders <u>and its habitat but, with implementation of avoidance, minimization, and mitigation measures and the specific CTS measures, the proposed action is not expected to have significant adverse effects to the species.</u> <del>since</del> <u>In addition,</u> none of the occupied pools would be impacted by clearing and grubbing and grading activities related to construction of access roads and pads, footings and foundations for the transmission line.”
10	8-24, second paragraph, first and second sentences	The size of the buffer is 4.58 acres. <i>See</i> HCP at 4-29. Recommend the following revision for accuracy and consistency with the HCP: “Construction Covered Activities would also result in indirect effects to California tiger salamanders and to suitable habitat. These indirect effects include impacts to up to <del>44.58</del> <u>4.58</u> acres of buffer. . .”
11	8-32, third full paragraph, fourth sentence	The size of the foraging habitat is 1,048 acres. <i>See</i> HCP at 3-62. Recommend the following revision for accuracy and consistency with the HCP: “In total, there are <del>1,034</del> <u>1,048</u> acres of suitable breeding and foraging habitat for this species within the HCP Permit Area.
12	8-37, third paragraph; 8-40, fourth full paragraph	Recommend the EA be clarified as follows: There are 8 acres of riparian habitat <u>in the HCP Permit area, of which 5.38 acres are considered</u> <del>and 15 acres of riverine habitat</del> suitable for nesting and foraging by the southwestern willow flycatcher in the HCP Permit Area. <u>There are approximately 10 acres of riverine habitat in the HCP Permit area considered suitable for foraging.</u>
13	8-44, third paragraph	The annual grassland acreage is 1,048 acres. Recommend the following revision for accuracy and consistency with the HCP: “There are 1,857 acres of agricultural land cover types that provide foraging and movement habitat and <del>1,034</del> <u>1,048</u> acres of annual grassland that provides movement, foraging, and denning habitat for San Joaquin kit fox within the HCP Permit Area.”
14	8-52, last paragraph, second and	The EA states: There are no documented occurrences of Hoover’s spurge within the HCP Permit Area. The CNDDDB includes 29 occurrences within 7.0 miles of the project site, the nearest approximately 1.1 miles to the northwest (CDFW 2013). This language is inconsistent with the description on page 3-77 of the HCP, which indicates that the closest known occurrence is

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	third sentences	approximately 0.47 miles from the HCP Planning Area, and uses different sources for the information.
15	8-55, second paragraph, last sentence	Recommend the following revision for clarity: “All <u>temporary</u> work areas would be revegetated following construction.”
16	8-56, second full paragraph, second sentence	Because this paragraph addresses avoidance and minimization measures for O&M activities, we recommend replacing the construction AMM measures with the corresponding O&M AMM measures for accuracy: “However, the incorporation of avoidance and minimization measures, including control of the introduction and spread of invasive plants ( <del>AMM C-6 O&amp;M-14</del> ), restriction of fueling and maintenance of vehicles within 100 feet of a waterway ( <del>AMM C-8 O&amp;M-9</del> ), and erosion control measures ( <del>AMM C-9 O&amp;M-10</del> ) would reduce indirect effects to suitable and occupied habitat such that they would not result in significant adverse effect.
17	8-90, last paragraph to 8-91 first paragraph	This section addresses Swainson’s hawk. Therefore, recommend deleting the sentence, which addresses southwestern willow flycatcher only and appears to be inadvertently included in the Swainson’s hawk section: “Furthermore, should southwestern willow flycatcher occupy riparian habitat within the footprint of a foreseeable future project, the project proponent would need to apply for a permit from the Service to authorize the incidental take of a state-listed species.”
18	10-2, at end of bullet point list	Recommend adding the following sentence to clarify that “The ADI and the API constitute the Area of Potential Effect (APE) under the National Historic Preservation Act.”
19	10-12, first full paragraph	Because the term “Big Creek East and West Transmission line” is not used in the EA until page 10-12, recommend clarifying in the first sentence that the references to the “Big Creek East and West Transmission line” are synonymous with the Big Creek 1-Rector and Big Creek 3-Rector transmission lines: , “The Big Creek East and West Transmission line ( <u>also known as the Big Creek 1-Rector and Big Creek 3-Rector transmission lines</u> ) were built in ....”  These two, historic transmission line segments were removed as part of the work associated with the Big Creek Rebuild project. This removal work is completed and, therefore, there are no construction impacts due to the Cross Valley Line to these resources. Therefore, recommend deleting the last sentence of the paragraph and replacing it with a sentence that reads “Approximately 11 miles of these transmission lines were removed as a result of construction work associated with the Big Creek Rebuild. The proposed action will not affect historic facilities associated with the Big Creek East and West transmission lines.”
20	11-14, fifth paragraph; 12-10, second full	The EC stated in the text for traffic-related effects should be EC TRA-1. Recommend the following revision for accuracy and internal consistency: “E.g., These effects would be reduced through proper coordination of traffic management plans, as required under EC TRA- <del>21</del> .”

	Page	Revision						
	paragraph							
21	13-5, last paragraph, second sentence	Recommend the following revisions for clarity: “The EPA has designated the SJVAB as a nonattainment area for the federal 8-hour ozone standard ( <u>extreme</u> ), and CARB has designated the SJVAB as a nonattainment area for the state 1-hour ( <u>severe</u> ) and 8-hour ozone standards.”						
22	13-27	<p>Recommend the following revisions to Table 13-9 for accuracy:</p> <table border="1" data-bbox="396 532 1150 634"> <thead> <tr> <th data-bbox="396 532 804 565">Criteria Pollutant</th> <th data-bbox="804 532 1150 565">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="396 565 804 597">Oxides of Nitrogen (NO<sub>x</sub>)</td> <td data-bbox="804 565 1150 597"><del>Severe-Extreme</del> Nonattainment</td> </tr> <tr> <td data-bbox="396 597 804 634">Volatile Organic Compounds (VOCs)</td> <td data-bbox="804 597 1150 634"><del>Severe-Extreme</del> Nonattainment</td> </tr> </tbody> </table>	Criteria Pollutant	Status	Oxides of Nitrogen (NO <sub>x</sub> )	<del>Severe-Extreme</del> Nonattainment	Volatile Organic Compounds (VOCs)	<del>Severe-Extreme</del> Nonattainment
Criteria Pollutant	Status							
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23	13-29	<p>Recommend adding the following discussion of Valley Fever from the Final EIR, which has already been disclosed to the public:</p> <p><u>“Fugitive dust emissions may also contain dust spores that cause coccidioidomycosis (Valley Fever). This disease is highly endemic to the San Joaquin Valley and often results in flu-like symptoms that typically clear within a few weeks. Individuals residing, visiting or even passing through endemic areas may be exposed to the disease. Risk of infection is highly dependent on the amount of time spent outdoors and involvement in activities that expose individuals to dusty conditions (USGS, 2000).</u></p> <p><u>Earth disturbing activities associated with construction of the Proposed Project and alternatives would generate fugitive dust emissions that may contain dust spores associated with Valley Fever. Dust control measures are the main defense against infection (USGS, 2000). Implementation of Environmental Commitments (EC) AQ-1 and EC AQ-2 would reduce fugitive dust thereby limiting the chance of exposure to dust spores associated with Valley Fever. Furthermore, in California, Valley Fever infection rates are typically higher during the hot summer months following winter rains between November and April (USGS, 2000). The majority of receptors that would be exposed to fugitive dust emissions would be located along the existing SCE ROW. <del>Due to outage constraints,</del> Due to the existing project construction schedule, it is unlikely that intensive construction activities would occur within existing ROW during hot summer months, further limiting the chance of exposure to harmful dust spores.”</u></p> <p>Further recommend adding the following citation to the list of references at the end of Chapter 8: <u>“United States Geological Survey (USGS), 2000. Operational Guidelines (version 1.0) for Geological Fieldwork in Areas Endemic for</u></p>						

	<b>Page</b>	<b>Revision</b>
		<u>Coccidioidomycosis (Valley Fever), 2000.</u> ”
24	13-36, first full paragraph	Recommend the following edits for internal consistency: “ <u>Past, P</u> present and probably <u>e</u> future projects in the vicinity of the HCP Permit Area . . . would include the Big Creek Rebuild project...If grading and earth-moving activities associated with these projects would overlap with activities associated with construction of the transmission line, cumulative local impacts to PM <sub>10</sub> and PM <sub>2.5</sub> levels would be potentially adverse, <u>but are not expected to rise to the level of being cumulatively significant.</u> ”
25	14-18, last paragraph, first sentence	Recommend the following revisions for internal consistency: “The effects of the proposed action, when considered with other projects in the region, <del>would</del> <u>may</u> result in a cumulative impact to noise.”