# 5.18 Utilities and Service Systems

This section addresses the potential impacts on water, wastewater, solid waste disposal systems, and energy systems that could result from construction, operation, and maintenance of the Proposed Project and alternatives.

# 5.18.1 Setting

### Water Services

The following three domestic water service providers, both public and private, service the Proposed Project area: Ventura County Waterworks District No. 1 (District No. 1), California American Water Company (CalAm), and Camrosa Water District.

District No. 1 provides potable water to the City of Moorpark and contiguous unincorporated areas to the north and west. District No. 1 sources of water include five groundwater wells and water provided from the State Water Project. District No. 1 serves approximately 37,580 customers through 10,540 service connections, and maintains 138 miles of water pipelines, 10 pumping stations, 20 pressure reducing stations, and 18 reservoirs. In 2012, District No. 1 supplied approximately 11,320 acre-feet (af) of water, 25 percent of it from local sources and 75 percent of it imported. Domestic, commercial, industrial, and fire protection customers consume approximately 77 percent of the total water supplied while the remaining 23 percent is consumed by agricultural customers (District No. 1, 2014).

The CalAm Ventura County service district provides water service to approximately one-half of the City of Thousand Oaks and portions of unincorporated Ventura County. In 2010, CalAm supplied 14,852 af of water to customers in the Ventura County service district (CalAm, 2011). All water provided to customers in the Ventura County service district is imported through the State Water Project and purchased from the Calleguas Municipal Water District. The Ventura County service district water distribution system includes 21 storage tanks, 18 boosters, and more than 269 miles of pipeline (CalAm, 2014).

The Camrosa Water District provides potable water to the cities of Camarillo and Thousand Oaks, and portions of unincorporated Ventura County. The 30-square mile district consists of 150 miles of buried pipeline, 10 reservoirs (total storage capacity of 14.3 million gallons or approximately 44 af), and five pumping stations. The Camrosa Water District serves approximately 7,990 residential, municipal, and industrial water connections and about 90 potable agricultural connections. In 2010, the Camrosa Water District supplied 15,025 af of water to their customers. Roughly 79 percent of that water was for residential, commercial, and industrial uses while the remaining amount served agricultural and other irrigation needs (Camrosa Water District, 2011).

### Wastewater Services

District No. 1 also provides wastewater services, including collection and treatment of wastewater at the Moorpark Wastewater Treatment Plant (MWTP) located at 9550 Los Angeles Avenue in the City of Moorpark. The MWTP on average treats 2.21 million gallons a day (mgd) with a capacity to treat 5 mgd. The MWTP also has the capacity to treat wastewater to a tertiary standard, for distribution to uses for landscape and agricultural irrigation (District No. 1, 2011).

The City of Thousand Oaks Public Works Department, Wastewater Division, provides sanitation services to the city of Thousand Oaks and is responsible for the planning, administration, operation, and maintenance of the wastewater collection and interceptor systems, as well as operation of the Hill Canyon Wastewater Treatment Plant (HCTP). The HCTP treats incoming wastewater to tertiary standards. On average the 14-mgd capacity HCTP treats 10.5 mgd of wastewater generated from domestic, commercial, and industrial customers (City of Thousand Oaks, 2014a).

### Solid Waste and Recycling Service

Solid waste from the Proposed Project, including excavated materials, would be delivered to one of the following waste facilities: Toland Road Landfill, Simi Valley Landfill and Recycling Center (SVLRC), Bradley East Processing/Transfer Station, or Antelope Valley Public Landfill. **Table 5.18-1**, *Solid Waste and Recycling Facilities That Serve the Proposed Project Area,* provides the permitted receiving capacity, remaining capacity, and the permitted capacity year for each of these solid waste and recycling facilities.

Waste Facility	Operated or Managed By	Location	Permitted Receiving Capacity (tons of waste / day)	Remaining Capacity (cubic yards)	Year Permitted Capacity would be Reached
Toland Road Landfill	Ventura Regional Sanitation District	3500 North Toland Road, Santa Paula	1,500	21,983,000	2027
Simi Valley Landfill and Recycling Center	Waste Management of California, Inc.	2801 Madera Road, Simi Valley	9,250	119,600,000	2052
Bradley East Processing/ Transfer Station	Waste Management Recycling and Disposal Services of California	9227 Tujunga Avenue, Sun Valley	1,532	n/a	n/a
Antelope Public Valley Landfill	Antelope Valley Recycling and Disposal	1200 W. City Ranch Road, Palmdale	3,564	20,400,000	2042

 TABLE 5.18-1

 SOLID WASTE AND RECYCLING FACILITIES THAT SERVE THE PROPOSED PROJECT AREA

NOTES: n/a = information not available.

SOURCES: CalRecycle, 2014a, b, c, d.

### **Electricity and Natural Gas**

Southern California Edison (SCE) is the primary provider of electrical services and natural gas throughout Ventura County (Ventura County, various dates).

### **Regulatory Setting**

### Federal

No federal regulations pertaining to utilities and service systems apply to the Proposed Project or alternatives.

### State

### Assembly Bill 939

Assembly Bill (AB) 939, enacted in 1989 and known as the Integrated Waste Management Act, requires each city and/or county in California to prepare a Source Reduction and Recycling Element (SRRE) to demonstrate reduction in the amount of waste being disposed to landfills, with diversion goals of 50 percent by the year 2000. Senate Bill (SB) 2202 made a number of changes to the municipal solid waste diversion requirements under the Integrated Waste Management Act. These changes included revision of the statutory requirements to state that local governments shall divert 50 percent of all solid waste on and after January 1, 2000. Diversion includes waste prevention, reuse, and recycling. Other related bills have addressed particular aspects of diversion, requiring programs or methodologies to address such issues as bottle recycling, re-chargeable battery recycling, plastic bag disposal, and others.

**Table 5.18-2**, *Diversion Rates (As a Percent of the Total Waste Stream)*, provides the 2005 and 2006 diversion rates (the most recent available data) for the cities within the study area, as well as for the unincorporated areas of Ventura County (CalRecycle, 2014e).

TABLE 5.18-2 DIVERSION RATES

05	2006
0	58
6	56
8	52
	6 8

SOURCE: CalRecycle, 2014e

More recent data is available as per capita disposal rates. The per capita disposal rate is a jurisdiction-specific index used as one of several factors in determining a jurisdiction's compliance with AB 939. The per capita disposal rate allows jurisdictions, as well as the California Department of Resources Recycling and Recovery (CalRecycle), to set their primary focus on successful

implementation of diversion programs (CalRecycle, 2014e). **Table 5.18-3** provides the 2012 per capita disposal rates in pounds per day for population and employment disposal.

	Population Disposal (PPD)		Employment Disposal (PPD)	
Jurisdiction	Target	Annual	Target	Annual
Moorpark	6.0	3.5	17.9	11.6
Thousand Oaks	7.5	4.5	14.8	9.1
Ventura County (Unincorporated	7.7	6.4	23.0	19.9

 TABLE 5.18-3

 2012 JURISDICTIONAL PER CAPITA DISPOSAL RATES

NOTES: PPD = pounds per day.

SOURCE: CalRecycle, 2014e

### 22 California Code of Regulations Division 4.5

Title 22 of the California Code of Regulations (CCR) discusses an array of requirements with respect to the disposal and recycling of hazardous and universal wastes. Specific standards and requirements are included for the identification, collection, transport, disposal, and recycling of hazardous wastes. Additional standards are included for the collection, transport, disposal and recycling of universal wastes, where universal wastes are defined as those wastes identified in Section 66273.9 of Title 22 of the CCR, including batteries, electronic devices, mercury containing equipment, lamps, cathode ray tubes, and aerosol cans. Requirements include recycling, recovery, returning spent items to the manufacturer, or disposal at an appropriately permitted facility. Division 4.5 of Title 22 also provides restrictions and standards relevant to waste destination facilities, and provides authorization requirements for various waste handlers. Title 22 includes California's Universal Waste Rule, as well as other additional waste handling and disposal requirements.

### Local

### Ventura County General Plan

California Public Utilities Commission (CPUC) General Order No. 131-D explains that local land use regulations would not apply to the Proposed Project or alternatives. However, for information purposes, the following goals and policies identified in the Ventura County General Plan (2007) would otherwise be relevant to the Proposed Project and alternatives:

*Goal 4.1.1.1:* Plan for public facilities and services which will adequately serve the existing and future residents of the County.

*Policy 4.4.2.6:* Applicants for discretionary development shall be encouraged to employ practices that reduce the quantities of wastes generated and shall be requested to engage in recycling activities to further reduce the volume of waste disposed of in landfills.

*Goal 4.5.1:* Promote the efficient distribution of public utility facilities and transmission lines to assure that public utilities are adequate to service existing and projected land uses, avoid hazards and are compatible with the natural and human resources.

*Policy 4.5.2.1:* New gas, electric, cable television and telephone utility transmission lines shall use or parallel existing utility ROWs where feasible and avoid scenic areas when not in conflict with the rules and regulations of the California Public Utilities Commission. When such areas cannot be avoided, transmission lines should be designed and located in a manner to minimize their visual impact.

*Policy 4.5.2.2:* All transmission lines should be located and constructed in a manner which minimizes disruption of natural vegetation and agricultural activities and avoids unnecessary grading of slopes when not in conflict with the rules and regulations of the California Public Utilities Commission.

*Policy 4.5.2.3:* Discretionary development shall be conditioned to place utility service lines underground wherever feasible.

#### Ventura County Construction and Demolition Debris Ordinance

Ventura County Ordinance 4421 establishes regulations for the recycling and diversion of construction and demolition (C&D) waste within Ventura County. This ordinance requires permit applicants working C&D projects within unincorporated areas of the county to practice waste prevention; reuse, recycle, or salvage; and, least preferred, landfilling solid wastes (VCPWA, 2014).

### City of Moorpark General Plan

The Moorpark General Plan does not include goals, objectives, and/or policies related to utilities and service systems that would apply to the Proposed Project or alternatives (City of Moorpark, various dates).

### City of Moorpark Construction and Demolition Debris Ordinance

Regulations for the recycling and diversion of C&D debris are provided in the City of Moorpark Ordinance Code 394. According to the ordinance, all demolition and city-sponsored projects, regardless of cost, and all new construction projects valued over \$500,000, are required to recycle a minimum of 65 percent of all materials generated during a project (City of Moorpark, 2014).

### City of Thousand Oaks General Plan

The Thousand Oaks General Plan does not include goals, objectives, or policies related to utilities and service systems that would apply to the Proposed Project or alternatives (City of Thousand Oaks, various dates).

### City of Thousand Oaks Construction and Demolition Debris Ordinance

The City of Thousand Oaks C&D Recycling Ordinance No. 1544-NS, adopted in 2010, establishes regulation for the recycling and diversion of C&D debris within the City of Thousand Oaks. According to the ordinance, certain C&D projects must divert at least 60 percent of the project generated waste either through recycling or reuse. A project that exceeds one or more of

the following would be subject to the C&D Ordinance: 1) 1,000 square foot (sq. ft.) or more for residential addition or remodel; 2) 1,000 sq. ft. or more for new structures (residential & commercial); 3) 2,000 sq. ft. or more for commercial improvements; 4) demolition of any structure requiring a permit; 5) permitted grading work generating 5 tons or more of inert waste material; or 6) City sponsored projects generating 5 tons or more of waste debris (City of Thousand Oaks, 2014b).

# 5.18.2 Significance Criteria

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would result in significant utilities and service systems effects on the environment if it would:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects;
- d) Not have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- f) Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- g) Not comply with federal, state, and local statutes and regulations related to solid waste.

# 5.18.3 Applicant Proposed Measures

No applicant proposed measures have been identified by SCE to reduce Proposed Project impacts on utilities and service systems.

# 5.18.4 Impacts and Mitigation Measures

## Approach to Analysis

This section presents an analysis of the potential impacts to utilities and service systems that would be associated with the construction, operation, and maintenance of the Proposed Project.

#### a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. (No Impact)

The Proposed Project would not exceed any wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (RWQCB). During construction, portable toilets would be provided for crews. Construction activities would be temporary, lasting approximately 10 months, and peak construction would employ a maximum of 217 workers per day. Wastewater generated during construction would be limited and handled by a licensed provider in accordance with all applicable requirements.

Proposed Project operation and maintenance would include personnel visits for routine and emergency inspections and to repair or maintain the infrastructure at Moorpark and Newbury substations, and along the subtransmission alignment. The frequency of inspection and maintenance activities would depend upon weather effects and any unique problems that may arise due to such variables as substantial storm damage or vandalism. The operational activities along the Proposed Project alignment and Moorpark and Newbury substations would be similar in scope to the existing operational activities taking place at these locations for other infrastructure, and the volume of wastewater discharged from proposed operational activities would not increase relative to current discharge volumes. The limited amount of wastewater generated during Proposed Project construction would not exceed treatment requirements; therefore, no impact would occur (No Impact). See also discussion e), below.

#### Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (No Impact)

The Proposed Project would not require or result in the construction of new water treatment facilities or the expansion of existing water treatment facilities. No such facilities would be developed as part of the Proposed Project and no construction-, operation-, or maintenance-related activity is expected to displace or destroy existing water wells, pipelines, or other facilities that provide water or wastewater services in the Proposed Project area.

The Proposed Project would require water use during construction, primarily as a dust control measure. Water would also be used during brushing, mowing, and road and work area rehabilitation at the approaches to work areas for installation of tubular steel poles (TSPs) and lightweight steel (LWS) poles, removal of lattice steel towers (LSTs) and wood poles, and at areas for stringing conductor and helicopter landing zones (other than Moorpark Substation). These activities would require approximately 37 acre-feet of water altogether, most likely brought to the site by water trucks. However, this water use would be temporary in nature and would not generate wastewater that would require treatment or disposal, because it would mostly be ground-applied during dry weather and would be absorbed into the ground or would evaporate, creating no runoff. As described in discussion a), wastewater generated during construction would be limited and handled by a licensed provider with available capacity for the Proposed Project's wastewater needs.

Operation and maintenance of the Proposed Project would require the use of water for washing of the insulators to prevent the buildup of contaminants such as dust, salts, droppings, and condensation. During operation and maintenance, water would be available via existing connections from local municipalities. Operational water use would generally be similar to that currently generated by operation of the existing subtransmission system. Use of this water would not require the construction of a permanent water treatment facility, nor would it result in the need for expanded treatment facilities off-site. Therefore, no impact would occur (No Impact). See also discussion d) and e), below.

#### Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. (No Impact)

No stormwater drainage facilities are proposed to be constructed as part of the Proposed Project. Construction, operation, and maintenance of the Proposed Project would result in very little change to the existing drainage pattern of the area, as the Proposed Project would result in the installation of 22 TSPs, foundations for 14 TSPs, two LWS poles, and would result in the removal of 14 LSTs and 6 wood poles within the existing SCE rights-of-way (ROWs). The TSPs would be installed on a concrete base foundation 6 to 8 feet in diameter and the LWS poles would be installed on a 2- to 3-foot concrete base foundation. For the LSTs and wood poles that would be removed and not replaced in the same location, holes would be filled and compacted, and the area would be smoothed to match surrounding grade. Restoration would include grading to original contours and reseeding where appropriate. Pole installation sites, work areas, pull and tension sites, staging areas, and access roads required for the Proposed Project would not result in a net increase in impervious surfaces, as no surfaces associated with the Proposed Project would be paved.

The Proposed Project would also involve modifications at the Moorpark Substation that would consist of installing new cable and conduit. None of these modifications would substantially increase runoff.

Since the Proposed Project would not substantially increase the amount of impervious surfaces, it would not create a significant amount of additional runoff water. Therefore, the Proposed Project would not require or result in the construction of a new or expanded storm drainage facility, and no impact would occur (No Impact).

# d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.

# Impact 5.18-1: Construction, operation, and maintenance would require the use of municipal water supplies. *Less than significant* (Class III)

The primary use of water during construction of the Proposed Project would be for dust suppression on access roads and active work sites. SCE estimates that approximately 37 af of water would be required altogether during the 10-month construction period, most likely trucked in from off-site. The working crew would bring in drinking water from off-site. Water used during the construction period would be available from existing municipal water sources identified in Section 5.18.1, *Settings*, and would not require local water providers to obtain additional water entitlements.

Operation and maintenance of the Proposed Project would require the use of water for washing of the insulators to prevent the buildup of contaminants such as dust, salts, droppings, and condensation, and reduce the possibility of electrical arcing that would result in circuit outages and potential fire. The frequency of insulator washing would be based on local conditions and build-up of contaminants. Operational water would likely be supplied from existing on-site connections. The volume of water necessary for these operations would slightly increase the volumes associated with current operations in SCE's ROW. These volumes of water would be small, and sufficient water supplies are available to serve the Proposed Project. Construction, operation, and maintenance of the Proposed Project would therefore not require new or expanded water supply resources or entitlements. Impacts to municipal water supplies would be less than significant.

Mitigation: None required.

#### e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (No Impact)

As described under criterion d), the primary use of water during construction of the Proposed Project would be associated with dust suppression. Water disposal would not be required because the water used during dust suppression activities would be minimal and would evaporate or be absorbed into the ground. In addition, construction crews would use portable sanitation facilities (portable toilets), generating relatively small volumes of wastewater for a limited time during the construction phase. Sanitation waste would be disposed of according to sanitation waste management practices. No other sources of wastewater are anticipated during the Proposed Project construction activities.

Operation of the Proposed Project would generate volumes of wastewater that would not increase relative to current discharge volumes. The construction and operation water usage of the Proposed Project would not affect the ability of wastewater treatment facilities to fulfill existing commitments; therefore, no impact would occur (No Impact).

# f) Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs.

# Impact 5.18-2: Construction would require the disposal of solid wastes. *Less than significant* (Class III)

Operation and maintenance of the Proposed Project would not generate solid waste and would therefore not affect existing landfill capacities (No Impact).

Construction of the Proposed Project would generate various waste materials, including wood, metal, soil, vegetation, and miscellaneous construction materials. This impact would be of short duration, lasting approximately 16 months (i.e., 10 months of construction and approximately 6 months of additional site clean-up.) As described in Chapter 3, *Project Description*, the Proposed Project would require the removal and disposal of 14 existing LSTs, six wood poles, and associated hardware. Solid waste from the Proposed Project would be separated by construction crews at the Proposed Project site into salvageable, recyclable, and non-reusable items. Items that could be recycled and salvaged (including conductor wire, steel from towers, and hardware) would be transported to staging areas. The existing wood poles removed for the Proposed Project would be returned to the staging yard, and either reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill which the RWOCB has approved for the disposal of treated wood waste. Other miscellaneous non-hazardous construction materials that cannot be reused or recycled would be disposed of at Toland Road Landfill, SVLRC, Bradley East Processing/Transfer Station, or Antelope Valley Public Landfill. Any hazardous materials would be recycled, treated, and/or disposed of in accordance with federal, state, and local laws. Impacts related to the removal and disposal of treated wood and construction materials would be less than significant (see Section 5.9, Hazards and Hazardous Materials, for additional information).

Soil and vegetative material excavated for the Proposed Project would either be used as fill, backfill, made available for use by the landowner, reused, or disposed of off-site in accordance with applicable requirements. Soils and vegetative matter unsuitable for backfill use would be disposed of at appropriate disposal sites.

As discussed in Table 5.18-1, *Solid Waste and Recycling Facilities That Serve the Proposed Project Area*, each of the possible disposal facilities that could be used by the Proposed Project has a remaining permitted capacity that far exceeds the amount of waste the Proposed Project would produce. Furthermore, each of the landfills listed in Table 5.18-1 has a permitted capacity to operate during and well past the construction period. Because the majority of waste resulting from the removal of LTSs would be included under the Ventura County and/or cities of Moorpark or Thousand Oaks C&D Debris Ordinances, and would be salvageable, and because the local landfills have sufficient capacity to accept the remainder of SCE's construction waste, this would be a less-than-significant impact.

Mitigation: None required.

# g) Comply with federal, state, and local statutes and regulations related to solid waste. (No Impact)

As discussed above, the Proposed Project would generate waste during construction and no waste during operation and maintenance. Construction waste would include disposal of a limited amount of materials that would not be recycled or reused, that would be disposed at Toland Road Landfill, SVLRC, Bradley East Processing/Transfer Station, or Antelope Valley Public Landfill. As discussed above, each of these landfills has sufficient capacity to accept anticipated Proposed Project waste.

Ventura County has an adopted the Countywide SRRE that establishes goals and methodologies for compliance with the California AB 939, which establishes 50 percent diversion of solid waste from landfills. As stated earlier, unincorporated Ventura County's diversion rate in 2005 was 48 percent and in 2006 was 52 percent; therefore, the County met the requirement of AB 939 in 2006 but not in 2005. The cities of Moorpark and Thousand Oaks met the requirement of AB 939 in 2005 and 2006. In 2013, neither unincorporated Ventura County nor the cities of Moorpark or Thousand Oaks met their population or employment disposal rates (CalRecycle, 2014e).

Nevertheless, as stated in Section 5.18.1, *Regulatory Setting*, Ventura County has a C&D ordinance that establishes diversion requirements for construction and demolition occurring within unincorporated areas. SCE would reduce construction material and treated wood pole waste through the processes described above in Impact 5.18-2 consistent with Ventura County recycling and reduction policies. Thus, the Proposed Project would not result in impacts related to conflict with statutes or regulations related to solid waste and recycling (No Impact).

# 5.18.5 Alternatives

## No Project Alternative 1

Under No Project Alternative 1, the Proposed Project would not be implemented and no impacts to utilities or service systems would occur. None of the Proposed Project objectives would be met and future demand in the electric needs area (ENA) would not be adequately met. SCE forecast indicates a projected voltage drop that would exceed the acceptable 5 percent limit on the 66 kV bus at Newbury Substation under abnormal system conditions and a projected overload on the Moorpark-Newbury tap of the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line under a normal system configuration. While these conditions would jeopardize SCE's ability to provide safe and reliable electric service to customers within the ENA, they would not result in physical impacts to utilities and service systems (No Impact).

### No Project Alternative 2

Under No Project Alternative 2, the Proposed Project would not be constructed and the infrastructure already constructed for the Moorpark-Newbury 66 kV Subtransmission line would be removed, with the exception of the previously installed LWS poles and energized conductor.

No Project Alternative 2 would require the removal of 22 TSPs, 30 TSP foundations, slurry from three foundation holes, and possibly infrastructure previously installed at Moorpark and Newbury substations. Compared to the Proposed Project, this alternative would generate proportionately more waste from removal activities. However, no part of this alternative would generate solid waste in amounts exceeding the capacity of local facilities serving the area. Impacts due to demands on water and solid waste disposal needs would be less than significant and no mitigation measures would be required. Like the Proposed Project, this alternative would not require construction or expansion of stormwater drainage facilities or wastewater treatment facilities. Additionally, No Project Alternative 2 would not exceed treatment requirements or conflict with statutes or regulations related to solid waste and recycling. Therefore, this alternative would result in no impact to utility services regarding criteria a), b), c), e), and g) (No Impact), and less-than-significant impacts regarding criteria d) and f) (Class III).

Under No Project Alternative 2, none of the Proposed Project objectives would be met and future demand in the electric needs area (ENA) would not be adequately met. SCE forecast indicates a projected voltage drop that would exceed the acceptable 5 percent limit on the 66 kV bus at Newbury Substation under abnormal system conditions and a projected overload on the Moorpark-Newbury tap of the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line under a normal system configuration. While these conditions would jeopardize SCE's ability to provide safe and reliable electric service to customers within the ENA, they would not result in physical impacts to utilities and service systems.

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