

— Errata 2 —

FINAL ENVIRONMENTAL IMPACT REPORT

SOUTHERN CALIFORNIA EDISON'S SANTA BARBARA COUNTY RELIABILITY PROJECT

JULY 2015

A. 1210018

SCH NO. 2013041070



Prepared for:



State of California
Public Utilities
Commission

Prepared by:



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**Santa Barbara County Reliability Project
Final Environmental Impact Report Errata 2**

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1 **1.0 Introduction**

2 The California Public Utilities Commission (CPUC) published the Final Environmental Impact
3 Report (EIR) for the Santa Barbara County Reliability Project (herein referred to as “SBCRP” or
4 “project”) on May 19, 2015. The Final EIR will be used to support the CPUC’s decision with respect
5 to Southern California Edison Company’s (herein referred to as “SCE” or “applicant”) application
6 for a Permit to Construct as well as Santa Barbara County’s issuance of a Coastal Development
7 Permit for portions of the project that are located within the Santa Barbara Coastal Zone. The CPUC
8 subsequently published an Errata document on May 29, 2015.
9

10 This Errata document (Errata 2) summarizes minor edits to the Final EIR for the project, which
11 provide clarification that will facilitate the use of the Final EIR to support the County’s
12 consideration for issuing a Coastal Development Permit. Other minor clarifications and corrections
13 were also included. Revisions included in this Errata document are shown in double underlined
14 text or ~~double strike-out~~ text; revisions that were included in the original Final EIR are shown in
15 underlined text or ~~strike-out~~ text.
16

17 Revisions presented in this Errata document do not present significant new information that would
18 deprive the public of a meaningful opportunity to comment upon a substantial adverse
19 environmental effect of the Project or a feasible way to mitigate or avoid such an effect. In addition,
20 information clarified in this Errata document does not present a new feasible project alternative or
21 mitigation measure (MM) that is considerably different from what was previously analyzed in the
22 Final EIR. All of the information included in this Errata document clarifies, amplifies, or makes
23 insignificant modifications to the Final EIR. Because this information is not considered
24 “significant,” recirculation of the Final EIR is not required in accordance with Section 15088.5 of
25 the California Environmental Quality Act (CEQA) Guidelines.
26

27 **2.0 Changes to the Final EIR**

28
29 **2.1 Reference to Federal and State permits**

30 Language in Chapter 4.4, “Biology”; Chapter 4.15, “Traffic and Transportation”; and Chapter 7.0,
31 “Environmental Impacts of the Past Work Along Segment 3A” has been modified to reflect the fact
32 that that the applicant will be required to comply with local regulations and permits that are not
33 preempted by the CPUC in addition to required federal and state regulations and permits. This
34 change has been made for further clarification but does not represent a new MM or applicant
35 proposed measure (APM) because the applicant is already required to comply with applicable local
36 regulations, statutes, and requirements, including the requirements of local permits that are not
37 preempted by the CPUC, regardless of whether or not the following language is included.
38

39 Additions to Chapter 4.4, “Biology,” Page 4.4-49 (lines 34-43) are shown below in underlined text.
40 See also Section 2.14 of this Errata document for discussion related to additional revisions to this
41 measure.
42

43 **MM BIO-14: O&M Mitigation.** For ~~any~~ O&M activities that ~~would~~ require ground disturbance or
44 vegetation clearance, including tree trimming, in project areas that pose a risk to sensitive species
45 or their habitat, as identified in Appendix D, “Biological Technical Report for the Santa Barbara
46 County Reliability Project,” SCE shall implement SCE will conduct an environmental review prior to
47 ~~conducting work to determine potential risks to resources and to determine whether additional~~

1 ~~permitting is required. If it is determined that O&M activities pose risks to sensitive species in the~~
2 ~~project area, SCE would prepare an Environmental Clearance, which would incorporate APMs and~~
3 ~~MMs consistent with those required during the construction phase for the same activities in these~~
4 ~~same work areas. Compliance with these APMs and MMs shall be in addition to, as listed herein, as~~
5 ~~well as state, and federal, and local regulations and permit requirements that are not preempted by~~
6 ~~the CPUC. Appropriate measures would be determined based on the habitat and sensitive~~
7 ~~resources within each O&M work area and will be consistent with those required during the~~
8 ~~construction phase for these same work areas, in order to ensure that ground disturbance or~~
9 ~~vegetation clearance activities occurring during the O&M impacts remain less than significant. The~~
10 ~~applicant will submit records on an annual basis to the CPUC Energy Division documenting~~
11 ~~locations where ground disturbing and vegetation clearance activities were performed and a~~
12 ~~record of the APMs and MMs that were implemented. The applicant will also submit records on an~~
13 ~~annual basis to Santa Barbara County if such O&M activities occur in the Santa Barbara Coastal~~
14 ~~Zone during the reporting period the Environmental Clearance to the CPUC for approval. Once the~~
15 ~~Environmental Clearance is approved, SCE will issue the Environmental Clearance to O&M work~~
16 ~~crews to adhere to during preconstruction and construction for O&M activities.~~

17
18 Additions to Chapter 4.15, "Traffic and Transportation," Page 4.15-26 (lines 29-31) are shown
19 below in underlined text:

20
21 Regular tree pruning would be performed in compliance with existing state and
22 federal laws, rules, and regulations as well as local permits and regulations that are
23 not preempted by the CPUC.
24

25 Additions to Chapter 7.0, "Environmental Impacts of the Past Work Along Segment 3A," in Sections
26 7.4.5.1, "Option A: Paint Existing LWS Poles and TSP Along Segment 3A;" 7.4.5.2, "Option B: Replace
27 Existing LWS Poles with Wood Poles Along Segment 3A;" 7.4.5.3, "Option C – Relocate the Portion
28 of Segment 3A that Traverses Agricultural Land in the Shepard Mesa Community to Underground
29 Conduit;" and 7.4.5.4, "Option D – Relocate Segment 3A to Underground Conduit" are shown below
30 in underlined and ~~strikeout~~ text:

31
32 **Section 7.4.5.1, "Option A: Paint Existing LWS Poles and TSP Along Segment 3A"**

33 **Reference (Page 7-30; lines 39-46):** Short-term impacts from hazardous materials
34 may result from the application of paint during pole painting activities. Painting
35 activities would require the use, transport, and disposal of hazardous materials on
36 site similar to what is required for the proposed project; however, Option A would
37 increase the amount of hazardous materials. Compliance with applicable federal,
38 and state, and local regulations and permits that are not preempted by the CPUC
39 would minimize the potential impact from hazards by requiring the applicant to
40 prepare and implement a Hazardous Materials Business Plan (HMBP) and other
41 measures to prevent the release of hazardous materials. Implementation of APMs
42 and MMs identified for the proposed project would also reduce potential short-term
43 impacts to less than significant.

44
45 **Section 7.4.5.2, "Option B: Replace Existing LWS Poles with Wood Poles Along Segment 3A"**

46
47 **Reference Page 7-34 (lines 1-5):** Ground disturbance during pole replacement would
48 increase the potential to damage a previously unknown cultural or paleontological
49 resource. However, compliance with applicable federal, ~~and state, and local~~ regulations and

1 permits that are not preempted by the CPUC as well as and implementation of APMs and
2 MMs identified for the proposed project would reduce the potential impacts associated
3 with Option B to less than significant.
4

5 **Reference Page 7-34 (lines 8-11):** Ground disturbance during pole replacement would
6 increase the potential for a geologic hazard to occur. However, compliance with applicable
7 federal, ~~and state, and local~~ regulations, including GO 95, and permits that are not
8 preempted by the CPUC, as well as implementation of APMs and MMs identified for the
9 proposed project would reduce the potential impacts associated with Option B to less than
10 significant.
11

12 **Reference Page 7-34 (lines 14-17):** Ground disturbance during pole replacement would
13 increase the potential for impacts related to drainage patterns, erosion, and other
14 hydrological or water quality impacts; however, the applicant would comply with
15 applicable federal, ~~and state, and local~~ regulations and permits not preempted by the CPUC
16 and implement APMs and MMs identified for the proposed project.
17

18 **Reference Page 7-34 (lines 28-32):** For example, disposal of the existing LWS poles would
19 be similar to what is proposed for Segments 3B and 4. In addition, the applicant would
20 comply with federal, ~~and state, and local~~ regulations and permits that are not preempted by
21 the CPUC, which would minimize the potential impact from hazards by requiring the
22 applicant to prepare and implement a SWPPP, HMBP, and other measures to prevent the
23 release of hazardous materials.
24

25 **Reference Page 7-39 (lines 5-14):** Ground disturbance during trenching and distribution
26 pole construction would be greater than required for the proposed project, which would
27 increase the likelihood of damaging a previously unknown cultural or paleontological
28 resource. Compliance with applicable federal, ~~and state, and local~~ regulations and permits
29 that are not preempted by the CPUC as well as and implementation of APMs and MMs
30 identified for the proposed project would reduce the potential impacts associated with this
31 project option to less than significant.
32

33 Operation and maintenance could require earthwork, as necessary, to locate the
34 new underground infrastructure. This could result in further impacts on buried
35 archaeological or paleontological resources in the future; however, the applicant
36 would continue to follow applicable federal, ~~and state, and local~~ regulations and
37 permits that are not preempted by the CPUC.
38

39 **Reference Page 7-39 (lines 18-21):** Ground disturbance during pole replacement
40 would increase the potential for a geologic hazard to occur. However, compliance
41 with applicable federal, ~~and state, and local~~ regulations, including GO 95, and
42 permits that are not preempted by the CPUC as well as and implementation of APMs
43 and MMs identified for the proposed project would reduce the potential impacts
44 associated with Option C to less than significant.

1
2 **Reference Page 7-39 (lines 24-27):** Ground disturbance during trenching would
3 increase the potential for impacts related to drainage patterns, erosion, and other
4 hydrological or water quality impacts; however, the applicant would comply with
5 applicable federal, ~~and state, and local~~ regulations and permits that are not
6 preempted by the CPUC as well as implement APMs and MMs identified for the
7 proposed project.

8
9 **Reference Page 7-39 (Lines 38-44):** Hazardous materials would include fuel, oil,
10 and other lubricants from construction equipment and vehicles. Compliance with
11 federal, ~~and state, and local~~ regulations and permits that are not preempted by the
12 CPUC would minimize the potential impact from hazards by requiring the applicant
13 to prepare and implement a SWPPP, HMBP, and other measures to prevent the
14 release of hazardous materials. Implementation of APMs and MMs identified for the
15 proposed project would also reduce potential short-term impacts. No long-term
16 impacts from hazards and hazardous materials would be anticipated.

17
18 **Section 7.4.5.4, “Option D – Relocate Segment 3A to Underground Conduit”**

19
20 **Reference Page 7-44 (lines 21-31):** Ground disturbance during trenching and
21 distribution pole construction would be greater than required for the proposed
22 project, which would increase the likelihood of damaging a previously unknown
23 cultural or paleontological resource. Compliance with applicable federal, ~~and state,~~
24 and local regulations and permits that are not preempted by the CPUC and
25 implementation of APMs and MMs identified for the proposed project would reduce
26 the potential impacts associated with this project option to less than significant.

27 Operation and maintenance could require earthwork, as necessary, to locate the
28 new underground infrastructure. This could result in further impacts on buried
29 archaeological or paleontological resources in the future; however, the applicant
30 would continue to follow applicable federal, ~~and state, and local~~ regulations and
31 permits that are not preempted by the CPUC, which would reduce impacts.
32 Therefore, long-term impacts related to Option D maintenance would be less than
33 significant.

34
35 **Reference Page 7-44 (lines 34-37):** Ground disturbance during pole replacement
36 would increase the potential for a geologic hazard to occur. However, compliance
37 with applicable federal, ~~and state, and local~~ regulations that are not preempted by
38 the CPUC, including GO 95 and implementation of APMs and MMs identified for the
39 proposed project would reduce the potential impacts associated with Option D to
40 less than significant.

1
2 **Reference Page 7-44 (lines 40-45):** Ground disturbance during trenching would
3 increase the potential for impacts related to drainage patterns, erosion, and other
4 hydrological or water quality impacts; however, the applicant would comply with
5 applicable federal, ~~and state,~~ and local regulations and permits that are not
6 preempted by the CPUC as well as implement APMs and MMs identified for the
7 proposed project. For example, the applicant would be required to implement a
8 SWPPP, which would include erosion measures and other measures to reduce
9 impacts on surrounding groundwater and hydrological features.

10 **Reference Page 7-45 (lines 7-12):** Hazardous materials would include fuel, oil,
11 and other lubricants from construction equipment and vehicles. Compliance with
12 federal, ~~and state,~~ and local regulations and permits that are not preempted by the
13 CPUC would minimize the potential impact from hazards by requiring the applicant
14 to prepare and implement a SWPPP, HMBP, and other measures to prevent the
15 release of hazardous materials. Implementation of APM and MM identified for the
16 proposed project would also reduce potential short-term impacts.

17 18 **2.2 County Review of Mitigation Plans**

19 Several MMs require the applicant to coordinate with Santa Barbara and Ventura Counties to
20 obtain agency review and comment on preconstruction plans prior to the CPUC's approval.
21 Language has been added to these MMs to clarify that Santa Barbara County will also have the
22 authority to approve plan language that relates to areas within their jurisdiction prior to
23 construction associated with components within the Santa Barbara Coastal Zone. Because Santa
24 Barbara County's approval will be required as part of the Coastal Development Permit process,
25 these changes have been made for further clarification but do not represent new MMs or APMs
26 because the applicant is already required to comply with applicable local regulations and the
27 requirements of local permits that are not preempted by the CPUC regardless of whether the
28 changes below are included in the Final EIR.

29
30 The following change in underlined text has been made to Chapter 4.13, "Public Services and
31 Utilities," Page 4.13-16 (lines 1-18) as well as Chapter 10.0, "Mitigation Monitoring Plan," Page 10-
32 68:

33
34 **MM PS-2: Solid Waste Management Plan.** The applicant will prepare and submit a
35 Solid Waste Management Plan to the CPUC ~~and the County of Santa Barbara~~ for
36 review and approval prior to the start of construction. The County of Santa Barbara
37 and the County of Ventura will also be provided the opportunity to review and
38 provide comments on the plan. Santa Barbara County must approve plan language
39 that relates to areas within its jurisdiction prior to project activities within the
40 Santa Barbara Coastal Development Zone. The Solid Waste Management Plan will
41 outline how the applicant will sort, measure, and record the disposal of solid waste
42 to ensure that no more than 350 tons of solid waste is delivered to a Santa Barbara
43 County operated solid waste disposal facility and that at least 60% (by weight) of
44 construction debris will be diverted through either reuse or recycling. Measures in
45 the plan will include, but will not be limited to:

- 46 • Provision of space and/or bins for appropriate storage of recyclable
47 materials on site;
- 48 • Establishment of a recyclable material pickup area; and

- Development of a recordation system that details the amount of solid waste created, solid waste recycled (including soil recycling), and solid waste delivered to each to a Santa Barbara County operated solid waste disposal facility.
- The plan will also detail reporting requirements to the CPUC, ~~and Santa Barbara County, and Ventura County.~~ Reporting will include biannual progress reports as well as notification to Santa Barbara County if ~~of when~~ the project's capacity at Santa Barbara County operated solid waste disposal facilities is reached.

The following change in underlined text has been made to Chapter 4.4, "Biological Resources," (refer to Page 4.4-42; lines 41-47 and Page 4.4-43; lines 1-31) as well as Chapter 10.0, "Mitigation Monitoring Plan," (refer to Page 10-17):

MM BIO-3: Noxious and Invasive Weed Control Plan. Prior to construction, the applicant will submit a Noxious and Invasive Weed Control Plan that is to be implemented before, during, and after construction and restoration of the proposed project. The final Noxious and Invasive Weed Control Plan shall be implemented, as specified, throughout construction and restoration. This plan will include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, or local weed control boards. At a minimum, this plan will include the following measures:

- Pre-construction surveys for special status plant species (APM BIO-1 and MM BIO-2) will include surveys for state- and county-designated noxious weed species. The applicant will coordinate with the appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement, or whether control or treatment of a species is feasible.
- If an invasive weed species is present at a given site, soils excavated from this location for use in construction and restoration activities (e.g., backfilling, road rehabilitation, etc.) will not be transported to a location that does not already contain the said invasive species.
- All vehicles and equipment will be cleaned off site prior to initial arrival at the project.
- Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads.
- Vehicle and equipment wash stations (mobile or built in place) will be erected at strategic locations on the right-of-way where designated weed species have been detected, and where doing so would help prevent the spread of these species.
- Straw, hay, gravel, soil, or other construction materials that could inadvertently contain unwanted plant propagules will come from state-cleared sources that are free of invasive weeds.
- All seeds to be used in revegetation and reclamation activities will come from weed-free sources.
- All temporary disturbance areas not subject to existing infestations of invasive plants, including access roads, transmission line corridors, and

towers, will be monitored for invasive species establishment on a quarterly basis for at least one year after project construction and restoration is completed. If evidence of invasive species introduction is found, the applicant will coordinate with appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement

- This plan will be developed in consultation with resource agencies (CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC six months prior to the start of construction, with the intent to produce a final draft of the plan no later than two months prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within its jurisdiction prior to project activities within the Santa Barbara Coastal Development Zone.

The following change in underlined text has been made to Chapter 4.4, "Biological Resources," (refer to Page 4.4-44; lines 6-37) as well as Chapter 10.0, "Mitigation Monitoring Plan," (refer to Page 10-18 through 10-20):

MM BIO-5: Habitat Restoration and Mitigation. Prior to construction, the applicant will submit a Habitat Restoration and Mitigation Plan to address areas of habitat loss to be restored or mitigated (for disturbances to jurisdictional features, see MM BIO-7). This plan will be developed in consultation with resource agencies (NMFS, USFWS, CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC six months prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within their jurisdiction, prior to project activities within the Coastal Development Zone.,-with the intent to produce a final draft of the plan no later than two months prior to the start of construction.

The following change in underlined text has been made to Chapter 4.4, "Biological Resources," Page 4.4-45 (lines 14-41) as well as Chapter 10.0, "Mitigation Monitoring Plan," Page 10-21 through 10-22:

MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat. Prior to project construction for all proposed project components in the vicinity of hydrologic features, the applicant will:

- Ensure that CPUC-approved biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional features during construction and restoration. If the applicant cannot maintain the 50 foot exclusionary buffer from the delineated bed/bank of a drainage feature or associated riparian habitat during project construction and restoration, the applicant will ~~obtain~~ consult with appropriate agencies about the need for all any necessary permits from appropriate agencies (e.g., USFWS, NMFS, CDFW, USACE, CPUC, County, as appropriate); will provide standard SWPPP BMP measures to prevent any solid or liquid materials from entering the drainage; and the applicant will submit proposed measures to CPUC for approval prior to construction. Measures should include information

1 on crossing streams on road beds. Vehicle or equipment travel and construction
2 or restoration of any proposed project component that requires altering,
3 removing, or filling the bed or bank of seasonal drainages or other jurisdictional
4 or potentially jurisdictional water features will be performed only when water
5 is not present in the feature, unless otherwise permitted by agencies (e.g.,
6 USFWS, NMFS, CDFW, USACE, CPUC, and County, as appropriate).

- 7 • Prior to construction, the applicant will submit a Hydrologic Features Mitigation
8 Monitoring Plan for affected hydrologic features in consultation with resource
9 agencies (USFWS, NMFS, CDFW, USACE, Santa Barbara County, CPUC, as
10 appropriate) and will provide to these agencies for review and comment. The
11 plan must be finalized and approved by the CPUC four months prior to the start
12 of construction. Santa Barbara County must approve plan language that relates
13 to areas within their jurisdiction, prior to project activities within the Coastal
14 Development Zone, with the intent to produce a final draft of the plan no later
15 than one month prior to the start of construction.
- 16 • The plan will provide measures to accomplish restoration, criteria for
17 restoration success, a post-construction monitoring schedule, and
18 compensation ratios for impacted jurisdictional areas.
19

20 2.3 Strike Text Inadvertently Omitted from Impact AE-SB-C

21 Response to Comment 1-38 discussed text revisions to Impact AE-SB-C regarding private views of
22 the project area; however, strikeout of this text was inadvertently omitted from Section 7.0, "Past
23 Work Along Segment 3A," of the Final EIR. Text changes to Impact AE-SB-C on Page 7-5, lines 34-43
24 of the Final EIR are shown below in ~~strike~~ text. Because the removal of this text was discussed in
25 response to comments on the Final EIR, this change does not constitute new information.

26 **Impact AE-SB-C: Substantially degrade the existing visual character or quality** 27 **of the site and its surroundings.**

28 SIGNIFICANT

29
30
31 Activities associated with construction of the existing subtransmission line along
32 Segment 3A were visible to the public. However, these impacts were short term and
33 less than significant.

34
35 Figure 7-2 compares Segment 3A (SR 192/Casitas Pass Road) conditions as they
36 existed prior to construction of the existing subtransmission line to the existing
37 conditions along SR 192/Casitas Pass Road. Prior to the past work along Segment
38 3A, wood poles lined SR 192/Casitas Pass Road. This portion of the roadway and
39 surrounding area was characterized by near views of orchards, trees, and
40 agricultural operations and background views of coastal hills and ridges. The
41 combination of rural and natural character provided views of high scenic quality,
42 intactness, vividness, and unity in this area. Similar to the discussion provided for
43 Impact AE-SB-B, the vertical forms and lines of the wood poles with horizontal
44 cross members and conductors contrasted with the dominant forms and lines in the
45 rural/natural landscape; however, their dark reddish-brown color helped blend
46 them with their surroundings. They appeared generally in scale and character with
47 other rural elements and the landscape as a whole. Moreover, wood power poles
48 often appear as common elements within rural landscapes. The taller galvanized

1 metal poles introduced into the landscape in this area appear as encroaching
2 elements that are out of scale and character with the rural/natural scene. Although
3 their forms and lines are similar to those of the wood structures, they are taller, and
4 their color and finish texture contrast with their surroundings and cause them to be
5 more noticeable. Although the introduction of the taller metal poles slightly reduced
6 the unity of views within the area, they substantially reduced intactness, vividness,
7 and the overall scenic quality of these views.
8

9 Viewer sensitivity along this segment ranges from moderately high to high due to
10 the large number of motorists that frequently travel along SR 192/Casitas Pass
11 Road and from the long duration views of surrounding residents. Additionally, the
12 City of Carpinteria has identified SR 192/Casitas Pass Road as a potential future
13 scenic highway (City of Carpinteria 2003). Therefore, the aesthetic impact of
14 introducing the metal subtransmission poles along and in the vicinity of SR
15 192/Casitas Pass Road is considered a significant long-term impact.
16

~~17 Similar to the poles along SR 192/Casitas Pass Road, wood poles were located on
18 private property between Shepard Mesa Road and SR 192 prior to the past work
19 along Segment 3A. Residents' views within this portion of Segment 3A include
20 orchards, trees, and agricultural operations and background views of coastal hills
21 and ocean. The high intactness, vividness, and unity of the combination of rural and
22 natural character provided high scenic quality. For the same reasons discussed for
23 SR 192/Casitas Pass Road, the taller galvanized metal poles appear as encroaching
24 elements that are out of scale and character with the rural/natural scene compared
25 to the previous wood poles. Viewer sensitivity along this segment is very high due
26 to the several residents with permanent views of the area. Therefore, the aesthetic
27 impact of the metal subtransmission poles within the Shepard Mesa area is
28 considered long term and significant.
29~~

30 **2.4 Chapter 7.0 Clarifications Regarding Previous Consultation**

31 Chapter 7, "Environmental Impacts of the Past Work on Segment 3A," has been revised to reflect
32 that no consultation occurred with wildlife agencies or with Native American tribes or tribal
33 individuals prior to construction of the portions of the project that have already been built. These
34 changes amplify the information included in this chapter regarding impacts that occurred as a
35 result of past work, but do not change the significance determinations for impacts to biological or
36 cultural resources, which remain undeterminable. Revisions to Section 7.3.5, "Cultural Resources,"
37 and Section 7.3.4, "Biological Resources," are shown below in underlined text.
38

39 **Reference Page 7-11 (lines 23-25):** The applicant did not complete cultural surveys along
40 Segment 3A prior to the start of construction of the existing subtransmission line and no
41 Native American outreach to tribes or tribal individuals took place preceding construction.
42

43
44 **Reference Page 7-10 (lines 20-24):** The applicant did not complete biological surveys
45 along Segment 3A prior to the start of the past work and no consultation with USFWS or
46 NMFS occurred prior to construction. Without baseline data related to the presence of
47 biological resources prior to construction, it is unknown to what extent the construction of
48 the existing subtransmission line along Segment 3A could have impacted biological

1 resources. Therefore, short- and long-term impacts that may have resulted due to
2 construction activities are undeterminable.

3 4 **2.5 Oak Tree Mitigation**

5 MM BIO-4 has been revised to clarify that compliance with the Santa Barbara County Coastal Land
6 Use Plan oak tree policies is required. Additions to MM BIO-4 on Page 4.4, "Biology" Page 4.4-43
7 and 4.4-44 (lines 33-43; 1-4) as well as Chapter 10, "Mitigation Monitoring Plan," Pages 10-40 and
8 10-41 of the Final EIR are shown below in underlined text. This change has been made for further
9 clarification but does not represent a new MM or APM because the applicant is already required to
10 comply with applicable local regulations, statutes, and requirements, including the requirements of
11 local permits that are not preempted by the CPUC. Compliance with Policy 9-35 and Policy 9-36 of
12 the Santa Barbara County Coastal Land Use Plan is a standard requirement of the Coastal
13 Development Permit.

14 15 **MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.**

- 16 • Temporary construction areas will be impacted in such a way that facilitates
17 post-construction restoration. For example, drive-and-crush methods in areas
18 with native vegetation will be employed where possible.
- 19 • The applicant will consult with a qualified arborist for the trimming and
20 removal of all native vegetation. The applicant will work with the qualified
21 arborist to determine the minimum amount of vegetation removal required to
22 accommodate project construction and restoration, as well as the correct
23 trimming procedures to employ. Additionally, the applicant will work with the
24 qualified arborist to preserve root zone aeration and the stability of native trees
25 where possible.
- 26 • The applicant will consult with the appropriate agency, including the CPUC, and
27 will adhere to any regulations, policies, and permit conditions for the following
28 impacts:
 - 29 ▪ Impacts on Critical Habitat.
 - 30 ▪ Impacts on ESHAs in the Coastal Zone.
 - 31 ▪ Impacts on special status natural communities, including riparian
32 communities, southern California black walnut woodland, southern
33 coast live oak riparian forest, and southern sycamore alder riparian
34 woodland.
 - 35 ▪ Impacts on coast live oak trees in the Coastal Zone (specifically,
36 consistency with Policy 9-35 and Policy 9-36 of the Santa Barbara
37 County Coastal Land Use Plan is required).

38 39 **2.6 Observances of Willow Flycatcher**

40 In comment 1-98 on the Draft EIR, the applicant requested that text identifying occurrences of
41 Southwestern Willow Flycatcher be removed since those occurrences had not been identified to
42 the subspecies level. In Final EIR Response to Comment 1-98, strikeouts were included (refer to
43 Page 4.4-32 lines 8-9) to reflect this request. However, for further clarification, text has now been
44 added to reflect that willow flycatcher occurrences were observed but that these occurrences had
45 not been identified to the subspecies level. This change does not impact any significance
46 determinations in the Final EIR and has been made only for additional clarification. This addition is
47 reflected in underlined text below:

1 USFWS-designated critical habitat for the southwestern willow flycatcher would be
2 crossed by the proposed project at the Ventura River and its associated riparian
3 habitat in Segment 2 (USFWS 2013b; Figure 4.4-1). There are records of willow
4 flycatcher occurrences in the project area in Segment 3A and 3B; however, these
5 were not identified to the subspecies level (ebird 2013). ~~and there are records of~~
6 ~~this species' occurrence in the project area in Segment 3A and 3B (Appendix E).~~
7 Impacts on foraging and/or nesting southwestern willow flycatcher, including
8 removal of a delineated territory (even if removal occurs outside the breeding
9 season), would be considered a "take" according to the ESA, MBTA, and CFGC.

11 2.7 Use of Herbicides

12 In Comment 1-100 on the Draft EIR, the applicant stated that herbicides will not be used for fire
13 protection or weed control. Therefore, reference to the use of herbicides was removed from
14 Section 4.4.4.3 of the Final EIR in response to this comment. All statements made in the applicant's
15 comment letter with respect to the project are considered part of the project design. However, for
16 clarity, text has been added to Section 2.0, "Project Description," as shown in underlined text below
17 to reflect that herbicides will not be used.

18
19 The applicant's standard approach to tree pruning is to remove at least the
20 minimum required by law plus one year's growth (species dependent). In addition
21 to maintaining vegetation-free access and spur roads and clearances around
22 electrical lines, clearance of brush and weeds around poles, and as required by local
23 jurisdictions on fee-owned ROWs, is necessary for fire protection. Section 4292 of
24 the California Public Resources Code directs the owner, controller, operator, or
25 maintainer of electrical transmission lines in mountainous land, forest-covered
26 land, brush-covered land, or grass-covered land, to maintain around and adjacent to
27 any pole or tower that supports a switch, fuse, transformer, lightning arrester, line
28 junction, or dead end or corner pole, a firebreak that consists of a clearing of not
29 less than 10 feet in each direction from the outer circumference of such pole or
30 tower, and to maintain a clearance of 4 feet from any line operating at 2,400 or
31 more volts, but less than 72,000 volts. No herbicides would be applied for
32 vegetation management purposes, such as for weed control or fire protection.

34 2.8 Mitigation Measure CR-4

35 In Comment 1-128 on the Draft EIR, the applicant requested that language requiring "A list of
36 personnel to whom the plan applies," be stricken from MM CR-4, stating that this language was not
37 necessary since the plan would apply to all personnel. This strike out was included (refer to page
38 4.5-29; line 26 as well as Chapter 10, "Mitigation Monitoring Plan;" Page 10-41) in response to
39 Comment 1-128. Although this has not been explicitly stated in the project description, all
40 statements made in the applicant's comment letter with respect to the project are considered part
41 of the project design. Nevertheless, for clarification, MM CR-4 has been revised in Chapter 4.5,
42 "Cultural Resources," Page 4.5-29 and in Chapter 10, "Mitigation Monitoring Plan," Page 10-41, as
43 shown in underlined text below, to clarify that the plan applies to all personnel.

44
45 **MM CR-4: Cultural Resources Plans.** Prior to construction, the applicant will
46 submit Cultural Resources Plans for the respective project components, prepared
47 by the approved consultant(s) (MM CR-3) for review and approval by the CPUC. The
48 final Cultural Resources Plans shall be implemented, as specified, throughout

1 construction and restoration. In addition, these plans will address cultural
2 resources eligible for the CRHR that cannot be preserved by avoidance and to
3 identify areas where monitoring of earth-disturbing activities is required. The
4 monitoring plan applies to all site personnel and shall include, at a minimum:

- 5
- 6 ~~• A list of personnel to whom the plan applies.~~
- 7 • Requirements, as necessary, and plans for continued Native American
8 involvement and outreach, including participation of Native American
9 monitors during ground-disturbing activities as determined appropriate.
 - 10 • Brief identification and description of the general range of the resources
11 that may be encountered.
 - 12 • Identification of the elements of a site that will lead to it meeting the
13 definition of a cultural resource requiring protection and mitigation.
 - 14 • Identification and description of resource mitigation that will be undertaken
15 if required.
 - 16 • Description of monitoring procedures that will take place for each project
17 component area as required.
 - 18 • Description of how often monitoring will occur (e.g., full-time, part time,
19 spot checking).
 - 20 • Description of the circumstances that will result in the halting of work and a
21 statement that either the archaeological monitor or the Native American
22 Monitor is authorized to call for work to be stopped.
 - 23 • Description of the procedures for halting work and notification procedures
24 for construction crews.
- 25 ~~• Testing and evaluation procedures for resources encountered.~~
- 26 • Description of procedures for curating any collected materials.
 - 27 • Reporting procedures.
 - 28 • Contact information for those to be notified or reported to.

29

30 **2.9 Mitigation Measure CR-5**

31 To clarify the CPUC's expectation that the tribes be given a reasonable timeframe to respond to the
32 applicant and consult regarding the project design and impacts on cultural resources, MM CR-5 has
33 been revised, as shown in underlined text, in Chapter 4.4, "Cultural Resources," Page 4.5-30 (lines
34 4-44) and Chapter 10, "Mitigation Monitoring Plan," Pages 10-42 through 10-44:

35

36 **MM CR-5: Native American Consultation and Participation Planning.** Prior to
37 construction, the applicant will provide evidence to the CPUC that tribes requesting
38 consultation with the applicant regarding the project design and impacts on cultural
39 resources were consulted at least 30 days prior to construction. In addition, the applicant
40 will provide evidence to the CPUC that tribes that have expressed interest in the project
41 during any phase (i.e., project application through end of construction and restoration) are
42 given the opportunity to participate in additional cultural resources surveys (MM CR-1) and

1 cultural resources monitoring when performed by a CPUC-approved cultural resources
2 consultant (MM CR-3).

3
4 To outline the expected duties and responsibilities of all parties involved, the applicant and
5 a CPUC-approved cultural resources consultant will submit a Native American Participation
6 Plan prior to construction. The final Native American Participation Plan shall be
7 implemented, as specified, throughout construction and restoration. Tribes that have
8 expressed interest in the project prior to construction will be given the opportunity to
9 participate in development of the plan. At minimum, the plan will specify that:

- 10
11 • Native American monitors, if approved by a tribe, are expected to participate in
12 worker environmental awareness and health and safety training and follow all
13 health and safety protocols.
- 14
15 • Attendance by Native American monitors during construction and restoration of the
16 project is at the discretion of the tribe, and the absence of a Native American
17 monitor, should the tribes choose to forgo monitoring for some reason, will not
18 delay work.
- 19
20 • The Native American monitors will have the ability to notify a CPUC-approved
21 cultural resources consultant who has the authority to temporarily stop work (MM
22 CR-7) if they find a cultural resource that may require recordation and evaluation.
- 23
24 • ~~Interpretation of a find will be requested from~~ Native American monitors will have
25 the opportunity to provide interpretation of involved with the discovery,
26 evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural
27 Resources Report (MM CR-10).
- 28
29 • The tribes involved with preparation of the Native American Participation Plan will
30 be given the opportunity to participate in the development of Testing and
31 Evaluation Plans (MM CR-8) and Data Recovery Plans (MM CR-9) if the
32 development of these plans is required.
- 33
34 • Native American monitors approved by a tribe for monitoring work on the project
35 will be notified 30 days prior to start of construction of the various project
36 components.
- 37
38 • The Native American monitors will be compensated for their time. If more than one
39 tribal group wishes to participate in the monitoring, SCE, in coordination with the
40 CPUC, will help facilitate a mutually agreeable plan for participation. ~~will work out~~
41 ~~an agreement for sharing of monitoring compensation.~~
- 42
43 • Define a process to inform tribes of completed cultural surveys and to provide a
44 copy of the survey to interested tribes.

39 **2.10 Land Use Development Code**

40 Text in Section 4.10, "Land Use," of the Final EIR (refer to Page 4.10-13, lines 15-32) has been
41 revised as shown in underlined text below to clarify that the Santa Barbara County Land Use and
42 Development Code applies to projects within the inland portions of Santa Barbara County (non-
43 Coastal Zone areas), whereas the Santa Barbara County Article II Coastal Zoning Ordinance applies
44 to projects within the Coastal Zone portions of the County. These changes have been made for

1 clarification but do not represent a new MM or APM. Further, these changes have no bearing on
2 impact determinations in the Final EIR.

3
4 **Santa Barbara County Land Use and Development Code**

5 Table 4.10-2 summarizes the zones that would be crossed by the proposed project
6 in Santa Barbara County. The Santa Barbara County Land Use and Development
7 Code applies to inland portions (i.e., non-Coastal Zone) portions of the proposed
8 project in Santa Barbara County. Section 35 of the Santa Barbara County Land Use
9 and Development Code states that transmission lines are permitted as a conditional
10 use in all zones crossed by the proposed project with the approval of a Conditional
11 Use Permit. However, the CPUC has preemptive jurisdiction over the construction,
12 maintenance, and operation of public utilities in the State of California; therefore, no
13 local discretionary permits would be required (Santa Barbara County 2011b,
14 Subsection 4.10.2.2, "State").
15

16 **Santa Barbara County Article II Coastal Zoning Ordinance**

17 Table 4.10-2 summarizes the zones that would be crossed by the proposed project
18 in Santa Barbara County. The Santa Barbara County Article II Coastal Zoning
19 Ordinance applies to portions of the proposed project in the Coastal Zone of Santa
20 Barbara County. Section 35-147 of the Santa Barbara County Article II Coastal
21 Zoning Ordinance states that transmission lines are subject to a Major Conditional
22 Use Permit and Coastal Development Permit (Santa Barbara County 2012). The
23 CPUC has preemptive jurisdiction over the construction, maintenance, and
24 operation of public utilities in the State of California; therefore, no local
25 discretionary permits would be required (Subsection 4.10.2.2, "State"). However,
26 because the Coastal Development Permit would be issued by the County on behalf
27 of the California Coastal Commission, this discretionary permit is required prior to
28 construction within the Coastal Zone.
29

30 **2.11 Coastal Land Use Plan Consistency**

31 In accordance with Santa Barbara County regulations, a project is not considered to be consistent
32 with the Coastal Land Use Plan and Coastal Zoning Ordinance until Santa Barbara County has
33 reviewed the applicant's final plans, which incorporate the final MMs, and determines consistency.
34 If the project is determined to be consistent, the County would issue a related Coastal Development
35 Permit. Therefore, the text in Chapter 4.10, "Land Use," (refer to Page 4.10-17; lines 20-37) has
36 been revised to reflect that the project is potentially consistent with the Coastal Land Use Plan and
37 Coastal Zoning Ordinance as shown in underlined and ~~strikeout~~ text below. This is consistent with
38 text included in Appendix G of the Final EIR.
39

40 Portions of Segment 3A and Segment 4 would be located in the Santa Barbara
41 County Coastal Zone. The coastal land use plan requires that projects crossing fault
42 lines within the coastal zone include additional safety standards. The proposed
43 project would be designed based on the results of the geotechnical studies
44 conducted by the applicant, which would identify fault lines and areas of
45 liquefaction. Depending on the results of the geotechnical studies, the applicant may
46 implement additional safety features into the design of the project prior to final
47 engineering, if applicable. The proposed project would minimize impacts to
48 sensitive viewsheds in the coastal zone by being located adjacent to existing

1 transmission lines. In addition, disturbed areas would be restored after
2 construction (Section 4.1, "Aesthetics" addresses impacts on the viewshed in the
3 coastal zone). Therefore, the proposed project would be potentially consistent with
4 the Santa Barbara County Coastal Land Use Plan and Coastal Zoning Ordinance.
5 However, Santa Barbara County will make a final determination on the project's
6 consistency with applicable CLUP policies and Coastal Zoning Ordinance standards
7 when the County reviews SCE's final plans prior to issuance of a Coastal
8 Development Permit. See the attached Appendix G, California Coastal Zone Land Use
9 Compatibility, for more information.

10
11 The proposed project would not conflict with the Santa Barbara County Land Use
12 and Development Code ~~and Coastal Zoning Ordinance~~ because transmission lines
13 are considered an allowable use in all zones crossed by the proposed project. In
14 addition, the applicant would acquire the necessary construction permits required
15 by the county, including permits required by the county's grading code.

16 2.12 Environmentally Sensitive Habitat Areas

17
18 The County of Santa Barbara has identified Environmentally Sensitive Habitats (ESHs) in ESH
19 overlay zones on County maps, as discussed throughout Chapter 4.4, "Biology," of the Final EIR.
20 However, Final EIR MMs address protection of the sensitive species and their habitat regardless of
21 whether they are located in previously identified ESH areas. A footnote has been added in Chapter
22 4.4, "Biology," Page 4.4-35 to further clarify this; as shown in underlined text below:

23
24 The Santa Barbara County CLUP identifies Native Plants as one of 13 ESHAs.¹

25
26 ¹ Consistent with local, federal, and state regulations, sensitive biological species
27 and their habitat are afforded protection in all areas of the project site. Accordingly,
28 Final EIR MMs address protection of sensitive biological resources and habitats
29 regardless of whether they are identified within previously identified ESH overlays
30 on County maps.

31 2.13 Clarification of Retaining Wall Information in Table 2-5 and Figure 2-4

32
33 In Comment 1-66 on the Draft EIR, the applicant submitted revised information regarding the
34 number and type of retaining walls as well as the proposed locations. However, the table submitted
35 in the comments was inadvertently cut off, and nine retaining wall locations were therefore
36 erroneously removed from Table 2-5, "Proposed Location for Retaining Walls," in response to this
37 comment. In addition, these retaining wall locations were not included in Figure 2-4, "Retaining
38 Wall Construction Sites," of the Final EIR, consistent with the table.

39
40 These retaining wall locations were originally included and fully analyzed in the Draft EIR. Their
41 removal from the Final EIR did not result in a change to significance determinations in any of the
42 resource areas; therefore, re-addition to the Final EIR would not result in any new or more
43 significant impacts than previously analyzed.

44
45 Table 2-5, "Proposed Location for Retaining Walls," on Page 2-23 of the Final EIR has been modified
46 accordingly and revisions are shown below in ~~strike-out~~ and underlined text. Additionally, Figure
47 2-4, "Retaining Wall Construction Sites," has been revised to reflect the following 10 retaining wall
48 locations that were inadvertently omitted in the Final EIR:

- 1
- 2 • Construction Site 74
- 3 • Construction Site 76
- 4 • Construction Site 97
- 5 • Construction Site 98
- 6 • Construction Site 99
- 7 • Access road between Construction sites 115-116
- 8 • Access road between Construction sites 116-117
- 9 • Access road between Construction sites 125-126
- 10 • Access road between Construction sites 125-126
- 11 • Access road between Construction sites 131-133
- 12
- 13

~~Table 2-5 Proposed Locations for Retaining Walls~~

Construction Site	Retaining Wall-Type Structure	Construction Site	Retaining Wall-Type Structure
62	MSE	104	MSE
64	MSE	105	MSE
64	Soldier Pile	107	MSE
67	MSE	109	MSE
74	MSE	118	MSE
76	MSE	120	MSE
76	Soldier Pile	Access road between Construction Sites 73-74	MSE
76	Gabion	Access road between Construction Sites 111-112	MSE
85	MSE		

14 ~~Source: SCE documentation submitted 2012-2014~~

15 ~~Key:~~

16 ~~MSE — mechanically stabilized embankment~~

17

Table 2-5 Proposed Locations for Retaining Walls

<u>Construction Site</u>	<u>Retaining Wall-Type Structure</u>	<u>Construction Site</u>	<u>Retaining Wall-Type Structure</u>
<u>62</u>	<u>Soldier Pile</u> <u>MSE</u>	<u>104</u>	<u>MSE</u>
<u>64</u>	<u>MSE</u>	<u>105</u>	<u>MSE</u>
<u>64</u>	<u>Soldier Pile</u>	<u>107</u>	<u>MSE</u>
<u>67</u>	<u>MSE</u>	<u>109</u>	<u>MSE</u>
<u>74</u>	<u>MSE</u>	<u>118</u>	<u>MSE</u>
<u>76</u>	<u>MSE</u>	<u>120</u>	<u>MSE</u>
<u>76</u>	<u>Soldier Pile</u>	<u>125</u>	<u>MSE</u>
<u>76</u>	<u>Gabion</u>	<u>Access road between Construction Sites 73-74</u>	<u>MSE</u>

Table 2-5 Proposed Locations for Retaining Walls

<u>Construction Site</u>	<u>Retaining Wall-Type Structure</u>	<u>Construction Site</u>	<u>Retaining Wall-Type Structure</u>
<u>85</u>	<u>MSE</u>	<u>Access road between Construction Sites 87-88</u>	<u>MSE</u>
<u>86</u>	<u>MSE</u>	<u>Access road between Construction Sites 89-90</u>	<u>MSE</u>
<u>90</u>	<u>MSE</u>	<u>Access road between Construction Sites 111-112</u>	<u>MSE or Soldier Pile</u>
<u>93</u>	<u>MSE</u>	<u>Access road between Construction Sites 115-116</u>	<u>MSE Gabion</u>
<u>96</u>	<u>MSE</u>	<u>Access road between Construction Sites 116-117</u>	<u>MSE Gabion</u>
<u>97</u>	<u>Soldier Pile MSE</u>	<u>Access road between Construction Sites 125-126</u>	<u>MSE Gabion</u>
<u>98</u>	<u>MSE</u>	<u>Access road between Construction Sites 125-126</u>	<u>MSE Gabion</u>
<u>99</u>	<u>MSE</u>	<u>Access road between Construction Sites 131-133</u>	<u>MSE Gabion</u>
<u>99</u>	<u>Soldier Pile</u>		
<u>100</u>	<u>MSE</u>		

1 Key:
 2 MSE _____ mechanically stabilized embankment earth
 3 Gabion _____ gabion basket retaining wall
 4

5 **2.14 Mitigation Measure BIO-14**

6 In response to Comment 1-101 on the Draft EIR, MM BIO-14 was included in the Final EIR to clarify
 7 that APMs and MMs that reduced impacts that could occur as a result of grading or habitat removal,
 8 including tree trimming, were also appropriate during the operations phase if these same activities
 9 occurred. To further clarify implementation of MM BIO-14, additions to Chapter 4.4, "Biology," Page
 10 4.4-33 (lines 19-24) are shown below in underlined text. These revisions clarify that APMs and
 11 MMs that would apply during the construction phase are also required to reduce impacts during
 12 operation if the same activities are occurring during that phase of the project. Although the EIR
 13 concluded that impacts are less likely to occur during operation, any impacts that did occur would
 14 be significant without the incorporation of appropriate APMs and MMs. Incorporation of these
 15 MMs reduces the impact to less than significant.

16
 17 **Operations and Maintenance Impacts**

18 Operation of the proposed project would involve periodic inspection of the
 19 subtransmission structures, conductor, telecommunications cable, and substation

1 infrastructure, and maintenance of access and spur roads and areas around
2 subtransmission structures (e.g., grading, vegetation removal) to enable safe access.
3 Inspection and maintenance activities would be infrequent, confined to previously
4 disturbed areas, and of much lower intensity than the construction-related activities
5 described above. Accordingly, these activities are not generally anticipated to have a
6 any substantial adverse effect on any candidate, sensitive, or special status species;
7 however, as described above, any grading or vegetation removal activities could adversely
8 impact special status species or habitat, resulting in a significant impact. This impact would
9 occur regardless of whether these activities occur during the construction or operations
10 phase. MM BIO-14 would require the applicant to implement the same APMs and MMs
11 during operation that are identified above to reduce these impacts to less than significant
12 during construction, as well as state, federal, and local regulations and permit requirements
13 that are not preempted by the CPUC, to reduce impacts to these resources. Therefore, in
14 order to ensure that impacts remain less than significant, the applicant would comply with
15 MM BIO-14, which would require that the applicant assess whether grading and vegetation
16 removal, including tree trimming, would impact resources special status species or their
17 habitat in the project area and issue an Environmental Clearance to O&M staff outlining
18 appropriate APMs, MMs, and state and federal permit conditions.

19
20 This Errata document includes additional revisions to MM BIO-14 that clarify which activities,
21 APMs, and MMs would be implemented for O&M activities in each work area rather than requiring
22 the applicant to submit an Environmental Clearance to the CPUC on a case-by-case basis. Because
23 the same APMs and MMs that would be implemented for grading and vegetation removal during
24 construction would similarly be implemented for these activities during operations, a new plan for
25 operations is not necessary. However, to verify implementation of these measures, the MM has also
26 been revised to reflect that the applicant will be required to submit an annual report to the CPUC
27 which would document where these activities occurred and the APMs and MMs that were
28 implemented. A report will also be submitted to Santa Barbara County if such O&M activities occur
29 in the Santa Barbara Coastal Zone during the reporting period.

30
31 Revisions to Chapter 4.4, "Biology," Page 4.4-49 (lines 34-43) as well as Chapter 10.0, "Mitigation
32 Monitoring Plan," Page 10-32 are shown below in underlined and ~~strikeout~~ text. These changes do
33 not present a new MM that is considerably different from what was previously analyzed in the EIR.
34 Rather, MM BIO-14 clarifies that MMs for the construction phase would apply during operation
35 phase.

36
37 **MM BIO-14: O&M Mitigation.** ~~For any O&M activities that would require ground~~
38 disturbance or vegetation clearance, including tree trimming, in project areas that pose a
39 risk to sensitive species or their habitat, as identified in Appendix D, "Biological Technical
40 Report for the Santa Barbara County Reliability Project," SCE shall implement SCE will
41 conduct an environmental review prior to conducting work to determine potential risks to
42 resources and to determine whether additional permitting is required. If it is determined
43 that O&M activities pose risks to sensitive species in the project area, SCE would prepare an
44 Environmental Clearance, which would incorporate APMs and MMs consistent with those
45 required during the construction phase for the same activities in these same work areas.
46 Compliance with these APMs and MMs shall be in addition to, as listed herein, as well as
47 state, and federal, and local regulations and permit requirements that are not preempted by
48 the CPUC. Appropriate measures will be determined based on the habitat and sensitive
49 resources within each O&M work area and will be consistent with those required during
50 the construction phase for these same work areas, in order to ensure that ground

~~disturbance or vegetation clearance activities occurring during the O&M impacts remain less than significant. The applicant will submit records on an annual basis to the CPUC Energy Division documenting locations where ground disturbing and vegetation clearance activities were performed and a record of the APMs and MMs that were implemented. The applicant will also submit records on an annual basis to Santa Barbara County if such O&M activities occur in the Santa Barbara Coastal Zone during the reporting period the Environmental Clearance to the CPUC for approval. Once the Environmental Clearance is approved, SCE will issue the Environmental Clearance to O&M work crews to adhere to during preconstruction and construction for O&M activities.~~

2.15 Mitigation Measure GEO-1

As discussed in response to Comment 1-133 in the Final EIR, during the scoping period for the proposed project, a member of the public commented on recent SCE emergency maintenance, voicing concern that SCE may not be properly maintaining equipment and asking for better oversight over SCE's operations. Considering this comment and the fact that four towers located adjacent to the Santa Barbara project were removed as part of an emergency maintenance procedure around the time the application was submitted for this project due to landslide concerns, the Final EIR included MM GEO-1.

Although the applicant would implement APM GEO-1, which would require that the applicant design project components in a way that would minimize the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse based on a geotechnical analysis, there is still a potential for slope instability to occur over time due to natural conditions within the project area or as a result of not maintaining design features intended to stabilize the slope. By proactively identifying areas that are exhibiting slope instability that could affect project facilities, appropriate actions can be taken before emergency maintenance is required. To further clarify the impact that would be mitigated through implementation of MM GEO-1, additions to Chapter 4.6, "Geology, Soils, and Mineral Resources," Page 4.6-20 (lines 36-40) are shown below in underlined text:

The majority of the project components would be sited on naturally unstable geologic units and soils with high erosion potential. Areas where the natural slope is over-steepened by the construction of access roads, subtransmission structure foundations, or other excavated areas would have increased landslide susceptibility. However, current project designs include retaining walls and erosion control devices (e.g., water bars) to combat slope instability and erosion. The SWPPP would require additional site-specific erosion control measures. In addition, based on the results of the geotechnical investigation and as part of implementing APM GEO-1, the applicant would design the project to avoid highly unstable areas, remove unstable materials, and incorporate design features such as stabilization fills, retaining walls, and slope coverings to avoid potential adverse effects to people or structures resulting from a landslide or reduce the potential for a landslide to occur. However, even with implementation of SWPPP measures and APM GEO-1, significant impacts could still occur during operations due to natural conditions in the project area. During operations, the applicant's implementation of MM GEO-1 would minimize potential impacts resulting from landslides by pro-actively identifying areas that are exhibiting characteristics of slope instability and determining appropriate maintenance required to stabilize the slope.



Existing Electrical Transmission Lines

- Segment 2
- Segment 3A
- Segment 3B
- Segment 4

— Existing SubTrans 66-kV To Be Removed

- Existing Substation Locations
- G Getty Tap
- Construction Site
- Access Road Construction Site
- Los Padres National Forest (USFS)

- Major Roads
- Local road
- County Boundary



Figure 2-4
Retaining Wall
Construction Sites

Santa Barbara County
Reliability Project
Santa Barbara and
Ventura Counties
California