

Appendix A

CEQA Scoping Summary Report Southern California Edison's Santa Barbara
County Reliability Project

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**CEQA SCOPING SUMMARY REPORT
SOUTHERN CALIFORNIA EDISON'S
SANTA BARBARA COUNTY RELIABILITY PROJECT**

**APPLICATION No.: A.12-10-018
SCH No.: 2013041070**

August 2013

California Public Utilities Commission
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List of Abbreviations and Acronyms

APCD	Air Pollution Control District
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
District	Ventura County Watershed Protection District
EIR	Environmental Impact Report
ENA	Electrical Needs Area
G.O.	General Order
IWMD	County of Ventura Public Works Agency Integrated Waste Management Division
kV	kilovolt
MTD	Santa Barbara Metropolitan Transit District
NOP	Notice of Preparation
PEA	Proponent's Environmental Assessment
proposed project	Santa Barbara County Reliability Project
PTC	Permit to Construct
ROW	right-of-way
Santa Barbara PDD	Santa Barbara County Planning and Development Department
SBCRP	Santa Barbara County Reliability Project
SCE	Southern California Edison
Ventura	San Buenaventura

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Overview of CEQA Scoping Process

1.1 Introduction

On October 26, 2012 Southern California Edison (SCE) filed an application for a Permit to Construct (PTC) (A.12-10-018) with the California Public Utilities Commission (CPUC) for the Santa Barbara County Reliability Project (SBCRP; or, proposed project) to rebuild and upgrade a portion of its transmission infrastructure in Santa Barbara and Ventura Counties between the City of San Buenaventura (Ventura) and the City of Carpinteria.

In accordance with the California Environmental Quality Act (CEQA), the CPUC is serving as the Lead Agency for the environmental review process and is preparing an Environmental Impact Report (EIR) to evaluate the proposed project. The EIR will describe the nature and extent of the environmental impacts expected to result from the SBCRP and project alternatives and will discuss mitigation measures for significant adverse impacts.

To help determine the scope of the impacts that will be assessed under CEQA, the CPUC has solicited input from the public and interested agencies on environmental impacts, mitigation measures, and any other potential concerns associated with the proposed project. On April 23, 2013, the CPUC formally began this public participation process (also known as “scoping”) by issuing a Notice of Preparation (NOP) for a draft environmental analysis.

1.2 Purpose of Scoping Process

The CPUC’s environmental review process invites broad public participation through public scoping meetings and comment periods to receive input on the proposed project. The scoping process provides the public with information regarding the proposed project and the CEQA and CPUC process. The purpose of the scoping process is to gather input from agencies and communities in the project vicinity to help the CPUC identify issues and the level of detail that should be included in the EIR, and to help identify a reasonable range of feasible alternatives to be evaluated in the EIR. Per CEQA Guidelines Section 15083, the CPUC may consult directly with any person or organization it believes will be concerned with the environmental effects of the SBCRP.

The scoping process does not seek to resolve differences of opinion on the proposed project, nor does it anticipate an ultimate decision. Rather, the process augments the development of a comprehensive EIR, which provides decision-makers with the information and analysis they need to thoroughly review SCE’s application.

1.3 Summary of Scoping Activities

This report summarizes the scoping activities that the CPUC has conducted for the proposed project. It also includes a summary of all written and oral comments received from agencies and members of the public during the scoping period in response to the NOP of an environmental analysis. The comments gathered from project stakeholders during the scoping process will be used to determine the scope and content of the environmental analysis.

Notice of Preparation

The CPUC circulated the NOP for the proposed project on April 23, 2013, opening a 30-day comment period on the scope and content of the environmental analysis and announcing a public scoping meeting. The comment period ended at 5:00 pm on May 23, 2013.

The NOP was sent to the State Clearinghouse (SCH No. 2013041070) and responsible and trustee agencies, including 69 representatives of federal, state, regional, and local agencies, planning groups. The NOP was also sent to members of six tribes. Additionally, the NOP was distributed to over 380 individuals, including property owners within 300 feet of the existing and proposed project right-of-way (ROW) and substations. The NOP is contained in Appendix A.

Table 1 Summary of Recipients of the NOP for the SBCRP EIR

Type	Number of Recipients
Representatives of federal, state, regional, and local agencies/ jurisdictions	69
Tribes	6
Property owners within 300 feet of project right-of-way	384
Total Number of NOPs Mailed	459

Newspaper Notices

The CPUC placed notices announcing the public scoping meetings in the following newspapers on April 23, 2013: the *Santa Barbara News Press* and *Ventura County Star*. On April 25, 2013, the CPUC placed a notice in the local weekly publication, the *Carpinteria Coastal View*.

Hotline, Email, and Public Website

The CPUC maintains a telephone hotline and an email address through which the public can comment on the proposed project. The CPUC also maintains a website with information and documents related to the proposed project. Information regarding the hotline, email, and website was included in the NOP and newspaper notices and made available at the public scoping meeting as part of project fact sheets. The project-specific email, fax, voicemail, and website are:

- **Email:** SBCRP.CEQA@ene.com
- **Fax:** 415-398-5326
- **Voicemail:** (855) 894-8054 (toll free)
- **Website:** <http://www.cpuc.ca.gov/Environment/info/ene/sbcrrp/sbcrrp.html>

Public Scoping Meetings

During the scoping period, the CPUC held a public scoping meeting on Tuesday, May 7, 2013, at the Carpinteria City Hall located at 5775 Carpinteria Avenue, Carpinteria, California. The following materials were provided at the meeting and are also included in Appendix B:

- Registration sheet;
- Example speaker card;
- Example written comment sheet
- Project fact sheets; and
- Posters

The meeting started with an open house, allowing participants time to sign in, view project maps, ask questions, and read the fact sheets prior to making a public comment. Following the open house, all meeting attendees were given an opportunity to ask questions about the proposed project and provide oral comments.

An additional tribal meeting was held on May 6, 2013, at the Carpinteria Branch Library, located at 5141 Carpinteria Avenue, Carpinteria, California, to discuss potential impacts of the proposed project on cultural resources. Representatives of tribes within the region were invited to attend the meeting. Comments received at this meeting, in addition to the contact list and registration sheet, are included in Appendix C (confidential).

Public and Agency Comments

Oral and written comments received during the comment period are summarized in Section 3 of this report. The scoping meeting registration sheets are included in Appendix B, and copies of comment letters received during the scoping meetings are included in Appendix D along with other written comments that were received during the scoping period.

Comments received will be used, as appropriate, in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR.

1.4 Alternatives Scoping and Screening

Pursuant to CEQA Guidelines Section 15127.6, the EIR will include a focused analysis of alternatives to the proposed project or alternative locations for the proposed project. Per CEQA, “An EIR need not consider every conceivable alternative to the proposed project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” Each alternative must “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.”

For each alternative identified in an EIR, CEQA requires that the EIR include sufficient information to allow for meaningful evaluation, analysis, and comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed. A “no project alternative” will also be evaluated, along with its impacts. The no project alternative assessment would describe what would reasonably be expected to occur in the foreseeable future if the project were not approved. If the no project alternative is determined to be the environmentally superior alternative, CEQA requires that the EIR identify a second environmentally superior alternative among the other alternatives.

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Overview of the Proposed Project

2.1 Background

The proponent's purpose for the project is to increase the reliability of the existing 66-kilovolt (kV) subtransmission system in northwestern Ventura County and southeastern Santa Barbara County to better meet the electrical demands of the Santa Barbara South Coast area during emergency conditions while also enhancing operational flexibility. The Santa Barbara South Coast area includes the cities of Goleta, Carpinteria, and Santa Barbara and adjacent areas of unincorporated southern Santa Barbara County.

In 1998, SCE initiated work in the project area on Segments 1, 2, and 3A. At the time, SCE believed that the proposed upgrades to subtransmission lines in the Ventura and Santa Barbara County area were exempt from permitting pursuant to CPUC General Order (G.O.) 131-D and the California Coastal Act (California Public Resources Code section 30610) because they were considered "equivalent facilities or structures." However, in 2004, residents of the Shepard Mesa area near Carpinteria raised concerns that the new structures in Segment 3A were different in appearance from the previous structures. Therefore, replacement of the poles was not consistent with Coastal Zone policies, and CEQA review was required. Upon reviewing photos of the new structures, California Coastal Commission and County of Santa Barbara Coastal Program staff determined that work within the Coastal Zone did not qualify for an Exemption from a Local Coastal Development Permit and issued a Stop Work order. However, between 1999 and 2004, SCE had already conducted the following activities prior to the Stop Work order:

- Some substation modifications were completed at the Carpinteria, Goleta, Isla Vista, Ortega, and Santa Clara Substations;
- New subtransmission structures and a 66-kV conductor were installed in Segment 1 from the Santa Clara Substation to the Casitas Substation, and the existing 66-kV conductor was removed;
- New subtransmission structures and a 66-kV conductor were installed in Segment 2 from Casitas Substation to the "Y" (the point along the corridor where Segments 2, 3B, and 4 converge) located near Casitas Pass just west of Lake Casitas in Ventura County, and the existing 66-kV conductor was removed;
- New subtransmission structures and a 66-kV conductor were installed in Segment 3A from the Carpinteria Substation to the Santa Barbara/Ventura County line, and existing wood subtransmission structures were removed or topped;
- Subtransmission structures in Segments 1 and 2 were partially removed; and
- Two footings for tubular steel poles, two lightweight steel H-frames, one lightweight steel pole, and two switches at the Getty Tap location were installed, and two wood H-frames and one wood pole were removed.

In 2012, SCE submitted an application to the CPUC for a PTC for the remaining work to be completed in the project area, the components of which are now referred to as the Santa Barbara County Reliability Project.

2.2 Project Description

The following activities are major components of the SBCRP:

- Reconstruction of existing 66-kV subtransmission facilities, primarily those located within the current utility ROWs between the “Y” in Ventura County and the Carpinteria Substation in Santa Barbara County (Segments 4 and 3B);
- Installation of marker balls on overhead wire;
- Modification of subtransmission and substation equipment within the Carpinteria Substation, Casitas Substation, and Santa Clara Substation;
- Replacement of line protection relays within existing substation equipment rooms or cabinets at the Getty Substation, Goleta Substation, Ortega Substation, and Santa Barbara Substation;
- Installation of telecommunications facilities along Segments 1, 2, and 4 and at the Carpinteria Substation, Casitas Substation, Santa Clara Substation, and Ventura Substation;
- Installation of a fault return conductor on subtransmission structures along Segment 3A; and
- Removal of subtransmission infrastructure foundations in Segments 1 and 2.

2.3 Project Location

The SBCRP would be located primarily in existing SCE ROW between the City of Ventura and the City of Carpinteria in Santa Barbara and Ventura Counties. The proposed project components have been divided into discrete geographic segments to facilitate discussion (Figure 1).

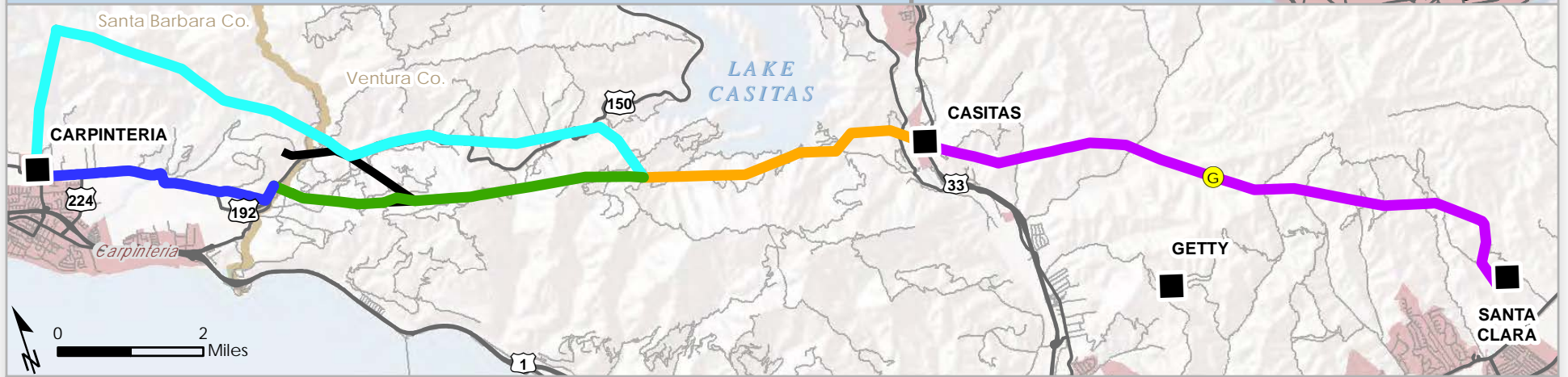
<i>Segment 1:</i>	Spans from the Santa Clara Substation in the east to Casitas Substation in the west.
<i>Segment 2:</i>	Spans from the Casitas Substation in the east to the “Y” in the west.
<i>Segment 3A:</i>	Spans from the Carpinteria Substation in the west to the Santa Barbara County/Ventura County border in the east.
<i>Segment 3B:</i>	Spans from the Santa Barbara County/Ventura County border in the west to the “Y” in the east.
<i>Segment 4:</i>	Spans from the “Y” in the east to the Carpinteria Substation in the west.
<i>Getty Tap:</i>	Located approximately in the middle of Segment 1.

2.4 Project Construction and Operations

Construction of the SBCRP is anticipated to begin in July 2014 and to take approximately two years. The EIR will provide specific information regarding activities associated with both the construction and operation of the proposed project.

2.5 Project Alternatives

Pursuant to CEQA, a reasonable range of alternatives to the proposed project will be identified and analyzed in the EIR. During the 30-day comment period following publication of the Draft EIR, agencies and the public will be given the opportunity to comment on the alternatives presented.



- | | | |
|--|-----------------------------------|-----------------|
| Existing Electrical Transmission Lines | Existing Substation Locations | Major Roads |
| Segment 1 | Getty Tap | Local road |
| Segment 2 | Los Padres National Forest (USFS) | County Boundary |
| Segment 3A | | City Limits |
| Segment 3B | | |
| Segment 4 | | |
| Existing SubTrans 66-kV To Be Removed | | |

Figure 1
Project Location

Santa Barbara County
Reliability Project
Santa Barbara and
Ventura Counties
California

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Summary of Scoping Comments

This section summarizes both written and oral comments received from members of the public and public agencies during the 30-day scoping period held for the SBCRP. Ten members of the public attended the public scoping meeting held on May 7, 2013, in Carpinteria. Two local Tribe members attended the tribal meeting held on May 6, 2013, to discuss potential impacts on cultural resources.

As shown in Table 2, the CPUC received five written comment letters from government agencies, one comment letter from a tribal member, and 10 comment letters from members of the public and a private organization. All comments were received before the end of the comment period and no extensions were requested. The CPUC also received four oral comments from members of the public and a private organization as shown in Table 3. A summary of the oral comments received from representatives of the Chumash Tribe is included in Appendix C, along with a copy of the comment letter received from the Chumash Tribe during the scoping period.

Table 2 Summary of Written Comment Letters Received During SBCRP EIR Scoping Period

Name	Affiliation	Date Received
Local and Regional Agencies		
Eric Gage	Santa Barbara Air Pollution Control District	5/17/2013
Alicia Stratton	Ventura County Air Pollution Control District	5/23/2013
Derrick Wilson	Integrated Waste Management Division	5/23/2013
Ewelina Mutowska	County of Ventura Public Works	5/23/2013
Tom Wolfington	Ventura County Watershed Protection District	5/23/2013
Chandra Wallar	County of Santa Barbara	5/23/2013
Tribal Representatives		
Patrick Tumamait	Native Chumash	5/6/2013
Individuals and Organizations		
Marc Chytilo	Law office of Mark Chytilo Santa Barbara	5/1/2013
David Fishman	None	5/2/2013

Table 2 Summary of Written Comment Letters Received During SBCRP EIR Scoping Period

Name	Affiliation	Date Received
Valerie Cavanaugh	None	5/3/2013
Fred Ali	None	5/3/2013
Lionel Neff	None	5/5/2013
David Lelande	None	5/6/2013
Kenneth Weiss	None	5/6/2013
Vera Bensen	None	5/7/2013
David Lelande	None	5/11/2013
Tom Mulroy	None	5/17/2013
Marc Chytilo	Law office of Mark Chytilo Santa Barbara	5/22/2013

Table 3 Summary of Oral Comments Received During EIR Scoping Meeting on May 7, 2013

Name	Affiliation
Individuals and Organizations	
Roxanne Lapidus	Carpinteria Valley Association
Bill Kersetter	None
Valerie Cavanaugh	None
Mark Chytilo	Law office of Mark Chytilo Santa Barbara

Concerns and requests raised during the public scoping period are summarized below.

3.1 CEQA Process/Public Notification

Several comments were received from members of the public and local agencies requesting that an EIR be prepared for the proposed project to fully assess impacts, as opposed to an Initial Study/Mitigated Negative Declaration. One comment expressed concern about not having received the NOP. The CPUC subsequently overnighted the NOP to the commenter.

3.2 Project Description, Objectives, and Alternatives

Project Description

Several comments received from agencies and the public regarding the project description included requests that the environmental document assess changes to the segments of the proposed project that had work completed between 1999 to 2004 in addition to the proposed replacements and upgrades. In addition, comments requested that the EIR include:

1. Maps that clearly show components of the proposed project and other nearby projects;
2. Maps that have a layered graphic approach to make them easier to read; and
3. A clear project description.

Objectives

No comments were received during the scoping period related to the objectives of the proposed project.

Alternatives

Comments received from the Santa Barbara County Planning and Development Department (Santa Barbara County PDD) recommended that:

1. Undergrounding be discussed for the already constructed, but not yet permitted, segment in Santa Barbara in the Shepard Mesa area (Segment 3A);
2. A discussion be included regarding the status of existing easements for overhead electric transmission facilities within the constructed segment (3A) and indicate whether these easements allow for undergrounding or if the easements would need renegotiation with the underlying landowners;
3. Figure 3.0-1b5 in the Preliminary Environmental Assessment (PEA) distinguish between Segment 3A, Segment 4, and the 220-kV line, in addition to clarifying the distance west of the span across Gobernador at which point the two rows of towers split, one heading more west-southwest and the other heading northwest;
4. Separate the discussion of impacts along Segment 4 by those that occur in Santa Barbara County and in the Coastal Zone of Santa Barbara County.
5. Discussion of Segment 4 specifically reference the impacts within Santa Barbara County;
6. Grading for any spur roads in the Coastal Zone be included in the project description and include an estimate of grading quantities specific to Santa Barbara County and the Coastal Zone;
7. The diameter of the lightweight steel poles be stated; and
8. The staging areas, or an existing yard, that will be used for construction of Segment 4 be identified.

Additional comments received during the scoping period regarding alternatives included requests that:

1. An alternative be considered in which all or portions of the proposed transmission lines would be undergrounded;
2. Undergrounding be considered in the most scenic areas, such as the Shepard Mesa area; and
3. Alternate alignments be considered, particularly one that would avoid impacts on the coastal viewshed.

3.3 Environmental Resources

Many comments from members of the public, agencies, and local organizations addressed potential impacts of the proposed project on the environment, most often with regards to aesthetics, cultural resources, biological resources, and the cumulative impacts on these resource areas from other proposed construction projects. Comments pertaining to impacts on specific environmental resources are described below.

Aesthetics

Comments from the Santa Barbara County PDD stated that:

1. The baseline for the assessment of impacts on visual resources should be the pre-construction condition for Segment 3A;
2. Depending on the level of impact identified, mitigation measures that should be considered include replacing the gray lightweight steel poles with wood, replacing the lightweight steel poles with a brown colored steel, and consideration of brown vs. gray steel for Segment 4, especially depending on the predominant viewshed (whether poles would be viewed against the backdrop of the Santa Ynez Mountains or along a ridge against the sky);

3. A brown matte paint could be considered as mitigation for Segment 3A if it would not result in other aesthetic issues (e.g., chipping paint or maintenance problems);
4. The aesthetic impacts on the Franklin Trail should be analyzed;
5. The aesthetic impacts of grading and retaining walls should be included in the analysis;
6. Components of the County's CEQA checklist should be incorporated into the questions and analysis to provide a better document for the County's use; and
7. The impact of the new poles should be analyzed in comparison to the existing towers.

Comments received from members of the public during the scoping period regarding aesthetics requested undergrounding of power lines in scenic areas and included the following concerns about the proposed project:

1. The effects on the scenic and rural inland Carpinteria Valley;
2. The effects of the industrial steel, silver poles as well as the greater quantity and thickness of wire on the Carpinteria viewshed in comparison to the existing wood poles;
3. The unsuitability of the project with the rural landscape;
4. The effects on views of the ocean and coastal bluffs;
5. The effects on views from resident's homes;
6. Impacts on an eligible scenic highway (State Route 150);
7. Impacts on the Santa Ynez Mountains as a scenic resource;
8. Visual impacts from future upgrades; and
9. Glare from the transmission infrastructure.

Commenters also requested that:

1. Mitigation be assessed for past impacts of the construction of Segment 3A on the coastal views in the area and that undergrounding of this section be considered;
2. An independent visual simulation be prepared by the CPUC's independent consultant, as opposed to being prepared by the proponent;
3. Key Observation Points that are in alignment with the transmission structures be assessed;
4. Public and private views be assessed;
5. Views from recreational areas such as the Los Padres National Forest and Franklin Trail be assessed.

Air Quality

Comments from the Santa Barbara County Air Pollution Control District (APCD) requested that the EIR:

1. Discuss the potential air quality impacts associated with construction activities for the proposed project;
2. Include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigation and establishes a mechanism for enforcement;
3. Discuss notification and reporting requirements pursuant to APCD Rule 1001-National Emission Standards for Hazardous Air Pollutants - Asbestos if the proposed project would involve any demolition or renovation of existing structures or foundations.

The Santa Barbara County APCD further recommended that mitigation measures be enforced as conditions of approval for the proposed project and noted that Section 6 of December 2011 *Scope and Content* document can be used as a source for determining appropriate mitigation measures for fugitive dust and equipment exhaust.

Comments from the Ventura County APCD recommended that the EIR:

1. Evaluate all potential air quality impacts on Ventura County that may result from the proposed project;
2. Consider reactive organic compound, nitrogen oxide, and emissions particulate from all project-related motor vehicles and construction equipment;
3. Identify any Ventura County APCD permitting issues;
4. Include a summary of the federal general conformity rule, which action(s) related to the project may require a conformity analysis to be performed, and which agencies will likely be involved with the conformity determination(s).

A comment from the Santa Barbara County PDD recommended that the environmental document be assessed in accordance with the County's *Environmental Thresholds and Guidelines Manual* and the Santa Barbara County APCD's *Scope and Content of Air Quality Sections in Environmental Documents* and requested an analysis of greenhouse gas-related impacts. The Santa Barbara County PDD also stated that dust mitigation measures are required for all discretionary construction activities, which includes construction activities associated with the SBCRP.

A comment from the public expressed general concerns that construction could result in significant emissions affecting air quality.

Biology

Comments from the Santa Barbara County PDD requested that the environmental analysis address:

1. The potential for spreading pests (including insects, diseases, and plants considered noxious according to Section 4500 of the California Code of Regulations or considered invasive by the California Invasive Plant Council) to agricultural and natural areas (e.g., National Forest);
2. Potential impacts to terrestrial native habitats and requested surveys for sensitive plant species, including Nuttall's scrub oak, Santa Barbara honeysuckle, and any other sensitive species identified by the California Natural Diversity Database as potentially occurring within the project area;
3. Whether any native trees (e.g., coast live oak, California sycamore, and California black walnut) would be impacted by the proposed project;
4. The fact that both the west fork, Carpinteria Creek, and the east fork, Gobernador Creek (in the Coastal Zone) are identified as critical habitat for steelhead trout;
5. The restoration of riparian habitats impacted by construction activities, per Santa Barbara County requirements, especially within the Coastal Zone, as they are designated environmentally sensitive habitat areas;
6. The fact that the trimming or pruning of native trees, especially sensitive native trees, should be conducted by a certified arborist, and that a tree protection plan should be prepared by a certified arborist;
7. The replacement of oak trees at a 10:1 ratio;
8. The adequacy of flagging to protect a sensitive plant source and the impacts of flagging/fencing itself; and
9. The mitigation that will occur if biological resources cannot be avoided (including specific buffers).

The Santa Barbara County PDD also stated that all mitigation measures should be changed to say "shall" versus "would" or "may."

Comments from members of the public included concerns about:

1. The contribution of transmission poles to the diminution of bird populations;
2. The effects of the proposed project on local flora and fauna;
3. The introduction of invasive species to the native chaparral;
4. The proposed project's impact on topography and drainages;
5. The proposed project's impact on riparian habitat;
6. The effects of the proposed project on steelhead critical habitat and other threatened and endangered species; and
7. Bird strikes.

Members of the public also requested a four-season flora survey and verification of SCE's survey work by an independent biological team.

Cultural Resources

Comments received from the Santa Barbara County PDD during the scoping period recommended that the EIR:

1. Reference the County Coastal Land Use Plan archaeological and historic policies;
2. Identify which county historical sites are located within and why they do, or do not, meet the criteria for a historic resource; and
3. Consider two of the Santa Barbara County PDD's standard mitigation measures, which require that a cultural resources monitor (archeologist or Native American) be present for all ground-disturbing activity near known resources and that work stop if a resource is discovered to allow for an investigation of the nature of the resource.

Comments received from the public and in a letter from a member of the Chumash during the scoping period regarding cultural resources:

1. Expressed concerns regarding the proposed project's potential to disturb or destroy cultural resources;
2. Requested that a Memorandum of Agreement between SCE and the Chumash be signed;
3. Requested that the CPUC coordinate with the Chumash community throughout development of the EIR;
4. Recommended that SB18 consultation occur to obtain input from local Native Americans, in addition to State Historic Preservation Office and the Native American Heritage Commission searches for cultural resources in the project vicinity;
5. A recommendation that the Most-Likely Descendants for the area be identified and consulted;
6. Requested that the environmental document should evaluate if there is a cultural landscape in the vicinity of the proposed project.

In addition to the scoping meeting, the CPUC invited local tribes to attend a meeting in Carpinteria to discuss potential impacts on cultural resources within the vicinity of the Project. Two Tribe members from local Chumash Tribes attended the meeting. A summary of comments from this meeting is included in Appendix C.

Geology

Comment from the Santa Barbara County PDD stated that if grading for access roads will be cumulatively greater than 50 cubic yards, there should be an analysis of potential impacts on geological resources and that mitigation for the proposed project should require that SCE conduct additional detailed, site-specific geotechnical analyses.

A comment from a member of the public expressed concern that a proposed pole (on parcel # 008-0-200-26 of Segment 3B of the proposed project) is proposed in an area marked on U.S. Geological Survey and California Geological Survey maps as an active landslide.

Hazards and Hazardous Materials

Comments received from the County of Ventura Public Works Agency Integrated Waste Management Division (IWMD) stated that the Ventura County's Countywide Siting Element, adopted in June 2001 and updated annually, confirms that Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects and that because the County currently exceeds the minimum disposal capacity required by the California Public Resources Code, the proposed project will have less than significant impacts and will not make a cumulatively considerable contribution to significant cumulative impacts related to Ventura County's solid waste disposal capacity. The IWMD also requested that:

1. The Lead Agency (CPUC) require SCE to comply, to the extent feasible, with the general requirements of Ventura County Ordinances #4445 (solid waste handling, disposal, waste reduction, and waste diversion) and #4421 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to meet the requirements of Assembly Bill 939;
2. That recyclable construction materials (e.g., concrete, asphalt, metal, rebar, wood) generated by the proposed project, but not reused on site, be recycled at a permitted recycling facility;
3. That soil not reused on site during the construction phase of the proposed project be transported to a permitted facility for recycling or reuse;
4. Illegal disposal and landfilling of soil be prohibited;
5. Wood waste and/or vegetation removed during the construction phase of the proposed project be diverted from the landfill by on-site chipping and land-application at various areas of the project site, or by transporting the materials to a permitted greenwaste facility in Ventura County;
6. All contractors submit a summary table to the IWMD at the conclusion of their work that shows the types of recyclable materials generated during the project (e.g., metal, concrete, asphalt, rebar, wood, soil, greenwaste) and the approximate weight of recyclable materials reused, on site and/or transported to a permitted facility for recycling and/or reuse; the name, address, and phone number of the facilities where recyclable materials were transported; and receipts and/or documentation for each entry.

Comments from the County of Ventura Public Works Stormwater Program noted that the proposed project is required to obtain a Ventura Countywide Municipal Stormwater National Pollutant Discharge Elimination System Permit, which will require the implementation of best management practices to prevent erosion and sediment loss, and the discharge of construction wastes based on the project scope criteria as defined by the Permit.

Comments from the Santa Barbara County PDD stated that all land in Carpinteria north of State Routes 192 and 150 (also known in this area as Foothill Road and Casitas Pass Road, respectively) is located within a High Fire Hazard Area, which would include all of Segment 4 and portions of Segment 3A, where it follows the road along the north side of the roadway. They also noted that these zones are identified by the California Department of Forestry and Fire Protection and adopted by ordinance.

Another commenter expressed concern about wildfire potential due to construction activities that could create a new ignition source and that increased capacity of the subtransmission lines may be more likely to cause a fire. The commenter also expressed concerns regarding project-related glare from metal poles.

Hydrology and Water Quality

A comment letter received from the Ventura County Watershed Protection District (District) Planning and Regulatory Division noted that there are several District jurisdictional channels (also referred to as “redline channels”) and facilities located in the project study area (e.g., Harmony Creek, Lake Canyon, Sexton Creek, East Fork Hall Canyon, Manuel Canyon, Canada Largo and facility, Weldon Creek and facility, Ventura River, etc.) for which the District undertakes ongoing operational monitoring and maintenance activities along the channels and facilities. In addition, District staff would like the environmental analysis to mention that any new towers or other ground facilities proposed will be located away from District property, the regulatory Floodway¹, and the bed and banks of redline channels. The District also requests that the analysis include:

1. A statement that in accordance with District Ordinance WP-1 enacted January 10, 2010, no person shall impair, divert, impede or alter the characteristics of the flow of water running in a redline channel without first obtaining a written permit from the District;
2. A statement that any activity in, on, under, or across any jurisdictional redline channel, including the channel bed and banks, will require a permit from the district; and
3. An exhibit that identifies the location of all proposed infrastructure reconstructions, upgrades, and new facilities and transmission alignments in relation to the District’s jurisdictional redline channels and facilities.

The Santa Barbara County PDD commented that any discretionary project undergoing environmental review must analyze water quality according to the adopted thresholds of significance under the Surface and Storm Water Quality Significance Guidelines of the Thresholds Manual, and, at a minimum, describe and quantify the volumes and location of grading for portions of Segment 4 within the County of Santa Barbara to determine whether the proposed project exceeds one or more of the thresholds.

Land Use

Comments received from the Santa Barbara County PDD stated that Segment 3A is entirely in the Coastal Zone and does not cross lands designated as AC [Commercial Agriculture]. Santa Barbara County PDD also stated that Figures 4.10-4b and 4.10-5b in the PEA should be marked as Resource Management zoning, not Open Lands.

Comments received from members of the public expressed concerns that the proposed project, as well as previously built portions of Segment 3A, conflict with the Coastal Zoning Ordinance and Coastal Land Use Plan. One commenter requested that SCE perform an economic and feasibility analysis to underground portions, if not all, of the proposed project to be consistent with the Coastal Zoning Ordinance, which contains a policy stating that “in important scenic areas where above ground transmission line replacement would unavoidably affect views, undergrounding shall be required where it is technically and economically feasible, unless it can be shown that other alternatives are less environmentally damaging.” The commenter also stated that the project, as proposed, would have a disproportionate impact on Shepard Mesa residents.

Agriculture

Comments from the Santa Barbara County PDD and a local resident requested that the environmental analysis address the potential for spreading pests (including insects, diseases, and plants considered noxious according to Section 4500 of the California Code of Regulations or considered invasive by the California Invasive Plant Council) to agricultural and natural areas (e.g. National Forest).

¹ Regulatory floodways are delineated on the effective Federal Emergency Management Agency’s Digital Flood Insurance Rate maps.

Public Services and Utilities

No comments related to public services or utilities were received during the scoping period.

Noise

Comments received from the Santa Barbara County PDD requested that the environmental document:

1. Assess County noise thresholds;
2. Analyze the noise impacts and apply the mitigation included in the Thresholds Manual;
3. Identify any residences within 1,600 feet of any construction site; and
4. Include separate measures for each jurisdiction, as well as the specific requirement for each jurisdiction, plan requirements, and timing and monitoring requirements.

The Santa Barbara County PDD also commented that it does not process variances from the construction hour limits that apply to noise-generating construction. Construction can occur outside of the construction hour limits only if a particular activity is not noisy.

Recreation

Comments received from the Santa Barbara County PDD and members of the community expressed concern for:

1. The increased risk to bicyclists, hang gliders, and other recreational users;
2. Impacts on bird watching activities; and
3. The potential for impaired views for hikers and equestrians, particularly from Franklin Trail, as access roads may coincide with portions of the trail when it opens to the public.

Traffic

Comments from the Santa Barbara County PDD received during the scoping period stated that:

1. The Santa Barbara Metropolitan Transit District (MTD) operates a route from Santa Barbara to Carpinteria (Route 20). According to the map on MTD's website, Route 36 (Seaside Shuttle) does not operate along any portion of Segment 3A;
2. The traffic analysis should describe the work necessary to complete the proposed project and the expected impacts of that work on transportation and traffic;
3. Santa Barbara County's traffic thresholds of significance should be referenced, and the project should be analyzed using these thresholds. Additional traffic information for roadways with poor level of service ratings may be needed.

Comments from members of the public submitted during the scoping period included requests that:

1. If Foothill Road is expected to be closed or partially closed to traffic during construction, SCE should coordinate with the City of Carpinteria to allow residents to come and go through the emergency gate and park service road in El Carro Park to reach El Carro Lane;
2. Effective traffic control measures be applied to prevent drivers from attempting to use Seacoast Village Streets as a bypass around project-related construction; and
3. A complete traffic plan be included for public review and comment in the environmental document and that the project's traffic plan consider the proposed project's potential impacts on local residences, a private elementary school, a girl's club near Foothill Road, and the city high school, which is accessed through Foothill Road.

Growth Inducing Impacts

Comments received from the public stated that the environmental document should analyze induced population growth from upgrades to the electrical infrastructure, noting that electrical needs have been a limiting factor to population growth in the past.

Cumulative

Comments received from local residents requested a robust cumulative analysis and expressed concerns that maintenance activities proposed by SCE may be part of the proposed project.

Comments Not Addressed in the CEQA Document

Some comments received during the scoping period will not be addressed within the context of the EIR, because they do not relate to a physical impact the proposed project may have on the environment. Such comments include:

1. Concerns related to the effects of the proposed project on property values; and
2. Several comments stating general opposition to the proposed project.

A

Notice of Preparation (NOP)

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**NOTICE OF PREPARATION
ENVIRONMENTAL IMPACT REPORT OR INITIAL STUDY/MITIGATED
NEGATIVE DECLARATION FOR THE
SANTA BARBARA COUNTY RELIABILITY PROJECT PROPOSED BY
SOUTHERN CALIFORNIA EDISON**

APPLICATION NO. A.12-10-018

To: All Interested Parties
From: Lon Payne, CEQA Project Manager, CPUC Energy Division
Date: April 23, 2013

Si usted necesita más información o una copia de este documento en español, por favor, llame al (855) 894-8054.

A. INTRODUCTION

Southern California Edison (SCE) filed an application for a Permit to Construct (PTC) with the California Public Utilities Commission (CPUC) for the Santa Barbara County Reliability Project (SBCRP) to rebuild and upgrade a portion of its transmission infrastructure in Santa Barbara and Ventura Counties between the City of San Buena Ventura (Ventura) and the City of Carpinteria. In accordance with the California Environmental Quality Act (CEQA), the CPUC is the Lead Agency and is preparing an environmental review document to evaluate the proposed project.

This Notice of Preparation (NOP) indicates the CPUC's intent to prepare an Environmental Impact Report (EIR) or Initial Study (IS)/Mitigated Negative Declaration (MND) in accordance with CEQA. The EIR would describe the nature and extent of the environmental impacts of the SBCRP and project alternatives, and would discuss mitigation measures for adverse impacts. Depending on the initial assessment of potential impacts related to the construction or operation of the project, the CPUC may instead issue an IS and draft MND, if appropriate.

With this NOP, the CPUC provides information about the SBCRP project description, location, and potential environmental impacts, and requests comments from interested persons, organizations, and agencies regarding the scope and content of the environmental information.

This NOP will be circulated for a public review and comment period beginning April 23, 2013 and ending at 5:00 pm on May 23, 2013. A scoping meeting will be held to receive comments, as described in Section D.

B. SUMMARY OF THE SBCRP

Background

In 1998, SCE initiated the SBCRP to increase reliability by reinforcing its existing 66 kilovolt (kV) subtransmission system in northwestern Ventura County and southeastern Santa Barbara County to meet the electrical demands of the Santa Barbara South Coast area during emergency conditions while also enhancing operational flexibility. The Santa Barbara South Coast area includes the cities of Goleta, Carpinteria, and Santa Barbara, and adjacent areas of unincorporated southern Santa Barbara County (Electrical Needs Area or ENA). Customers in northwest Ventura County would also benefit from the modernized facilities.

SCE commenced construction of the SBCRP in 1999 under the assumption that the Project was exempt from permitting pursuant to CPUC General Order (G.O.) 131-D and the California Coastal Act (California Public Resources Code section 30000 et seq). Between 1999 and 2004, the following portions of the Project were constructed:

- Some substation modifications were completed at the Carpinteria, Goleta, Isla Vista, Ortega, and Santa Clara Substations;
- New subtransmission structures and 66 kV conductor were installed in Segment 1 from Santa Clara Substation to Casitas Substation, and the existing 66 kV conductor was removed;
- New subtransmission structures and 66 kV conductor were installed in Segment 2 from Casitas Substation to the ‘Y’ (the point along the corridor where Segments 2, 3B, and 4 converge) located near Casitas Pass just west of Lake Casitas in Ventura County, and the existing 66 kV conductor was removed;
- New subtransmission structures and 66 kV conductor were installed in Segment 3A from Carpinteria Substation to the Santa Barbara/Ventura County line, and existing wood subtransmission structures were removed or topped;
- Subtransmission structures in Segments 1 and 2 were partially removed; and
- Two footings for tubular steel poles (TSPs), two lightweight steel (LWS) H-frames, one LWS pole, and two switches at the Getty Tap location were installed, and two wood H-frames and one wood pole were removed.

In 2004, Coastal Commission staff determined that the Project did not qualify for an Exemption from a Local Coastal Development Permit (CDP) and construction ceased. In 2012, SCE submitted an application to the CPUC for a permit to construct the components of the project not yet constructed, and those portions of the project that would require a CDP.

Project Description

Major components of the SBCRP include the following:

- Reconstruction of existing 66 kilovolt (kV) subtransmission facilities primarily within existing utility rights-of-way (ROW) between the existing Santa Clara Substation in Ventura County and the existing Carpinteria Substation in Santa Barbara County (Segments 4 and 3B);
- Installation of marker balls on overhead wire;
- Modification of subtransmission and substation equipment within the existing Carpinteria Substation, Casitas Substation, and Santa Clara Substation;

- Replacement of line protection relays within existing substation equipment rooms or cabinets at Getty Substation, Goleta Substation, Ortega Substation, and Santa Barbara Substation;
- Installation of telecommunications facilities along Segments 1, 2, and 4 and at Carpinteria Substation, Casitas Substation, Santa Clara Substation, and Ventura Substation;
- Installation of fault return conductor on subtransmission structures along Segment 3A;
- Removal of subtransmission infrastructure foundations in Segments 1 and 2;

Construction of the SBCRP is anticipated to begin in July 2014 and would take approximately 2 years.

Project Location

The components of the SBCRP would be primarily located in existing SCE ROW between the City of Ventura and the City of Carpinteria in Santa Barbara and Ventura Counties. The proposed project components have been divided into discrete geographic segments to facilitate discussions (Figure 1).

- Segment 1:* Spans from Santa Clara Substation in the east to Casitas Substation in the west.
Segment 2: Spans from Casitas Substation in the east to the 'Y' in the west.
Segment 3A: Spans from Carpinteria Substation in the west to the Santa Barbara County/Ventura County border in the east.
Segment 3B: Spans from the Santa Barbara County/Ventura County border in the west to the 'Y' in the east.
Segment 4: Spans from the 'Y' in the east to Carpinteria Substation in the west.
Getty Tap: The 'Getty Tap' is located approximately in the middle of Segment 1.

Operations and Maintenance

The subtransmission lines would be maintained in a manner consistent with CPUC G.O. 95 and G.O. 128, as applicable, and may include activities such as repairs, pole brushing in accordance with fire break clearance requirements, herbicide applications, and tree trimming to maintain a clear working space area around all poles. Typical activities would also include routine aerial and ground inspections, patrols, and preventive maintenance to ensure service reliability, as well as emergency work to maintain and restore service continuity. Activities associated with maintenance of the telecommunications line could include replacing defective circuit boards, damaged radio antennas, or feedlines and testing of the equipment. Telecommunication equipment would also be subject to routine inspection and preventative maintenance such as filter change-outs or software and hardware upgrades. Most regular operations and maintenance activities of telecommunication equipment would be performed at substations and would be accessed from existing access roads. All substations associated with the proposed project are, and would continue to function as, remotely controlled substations. Workers would routinely visit each substation, as needed, for standard operations and equipment maintenance.

Project Alternatives

If an EIR is confirmed to be the appropriate CEQA document for environmental review of the project, reasonable project alternatives will be identified and analyzed in the Draft EIR. Agencies and the public will be given the opportunity to comment on the project alternatives considered following publication of the Draft EIR during the 30-day comment period. A Notice of Availability (NOA) will be issued at the time of the publication of the Draft EIR to inform the public and agencies that the 30-day comment period for the Draft EIR has been initiated.

If an MND is confirmed to be the appropriate CEQA document for environmental review of the project, the public will be given the opportunity to comment following publication of the Draft MND during the 30-day comment period. A Notice of Availability (NOA) will be issued at the time of the publication of

the Draft MND to inform the public and agencies that the 30-day comment period for the Draft MND has been initiated.

C. SCOPE OF THE EIR AND DISCUSSION OF POTENTIAL IMPACTS

CEQA requires agencies to consider environmental impacts that may result from a proposed project, to inform the public of potential impacts and alternatives, and to facilitate public involvement in the assessment process. The CEQA document prepared for the project will describe in detail the nature and extent of the environmental impacts of the project, and will discuss appropriate mitigation measures for any adverse impacts. The EIR will include, among other matters, discussions of the project objectives, a description of the affected environment, an evaluation of the environmental impacts of the proposed project, and proposed mitigation to reduce environmental impacts to a less-than-significant level. If it is found that all environmental impacts can be mitigated to a less-than-significant level, an MND will be prepared.

An initial review of the Proponent’s Environmental Assessment (PEA), prepared by SCE for the project, has identified the following potential environmental impacts.

Table 1: Potential Project Issues or Impacts

Environmental Issue Area	Potential Issues or Impact
<i>Aesthetics</i>	<ul style="list-style-type: none"> Construction of the project components could result in impacts on aesthetics.
<i>Air Quality</i>	<ul style="list-style-type: none"> Construction could result in an exceedance of criteria air pollutants above established thresholds.
<i>Biological Resources</i>	<ul style="list-style-type: none"> Construction of the project could result in impacts on steelhead designated critical habitat, arroyo chub, and avian species.
<i>Cultural Resources</i>	<ul style="list-style-type: none"> Construction of some project elements could result in impacts on cultural resources.
<i>Traffic</i>	<ul style="list-style-type: none"> Temporary lane closures along Highway 33 and other streets in the project area could result in impacts related to traffic and transportation.

D. PROJECT SCOPING PROCESS AND MEETINGS

Circulation of this NOP opens a public review and comment period on the scope of the CEQA document that begins on April 23, 2013 and ends on May 23, 2013 at 5:00 p.m. All interested parties, including the public, responsible agencies, and trustee agencies, are invited to learn more about the project, ask questions, and present comments about the SBCRP at the public scoping meeting:

Tuesday, May 7, 2013

Carpinteria City Hall Council Chambers
 5775 Carpinteria Avenue
 Carpinteria, CA 93013

Open House: 6:30 p.m. to 7:00 p.m.
 Public Comment Session: 7:00 p.m. to 8:00 p.m.

Written scoping comments may also be mailed, faxed, or emailed to the CPUC during the NOP comment period specified above. Please include a name, address, and telephone number of a person who can receive future correspondence regarding the EIR. Please send your comments to:

Lon Payne
California Public Utilities Commission
RE: Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Emailed comments may be sent to: SBCRP.CEQA@ene.com. Faxed comments may be sent to (415) 398-5326. Voice messages may be left at: (855) 894-8054. For mailed, faxed, and emailed comments, please include your name and mailing address in your comment, and include the words “Santa Barbara County Reliability Project.”

Comments received during the scoping period will be considered during preparation of the SBCRP environmental document.

Agency Comments

This NOP was sent to responsible and trustee agencies, cooperating federal agencies, and the State Clearinghouse. Each responsible agency receiving this NOP is invited to respond by providing the CPUC with specific details about the scope, environmental issues, alternatives, and mitigation measures related to each responsible agency’s area of statutory responsibility that must be explored in the environmental analysis. In accordance with CEQA Guidelines Section 15082(b)(1)(B), responsible and trustee agencies should also indicate their respective level of responsibility for the SBCRP in their response. Please send responses to the address noted above.

G. ADDITIONAL INFORMATION

Information about the SBCRP and the CEQA process is available on the CPUC’s project website: <http://www.cpuc.ca.gov/Environment/info/ene/sbcpr/sbcpr.html>.

The website will be used to post all public documents related to the CEQA document. No public comments will be accepted on this website; however, the website will provide a sign-up option for interested parties to be placed on the project mailing list and a printable comment form.

The CEQA Guidelines are available at the following website:
http://www.ceres.ca.gov/topic/env_law/ceqa/guidelines

Appendix G of the CEQA Guidelines, which serves as an environmental checklist for all CPUC CEQA documents, is available at the following website: http://www.ceres.ca.gov/ceqa/guidelines/pdf/appendix_g-3.pdf

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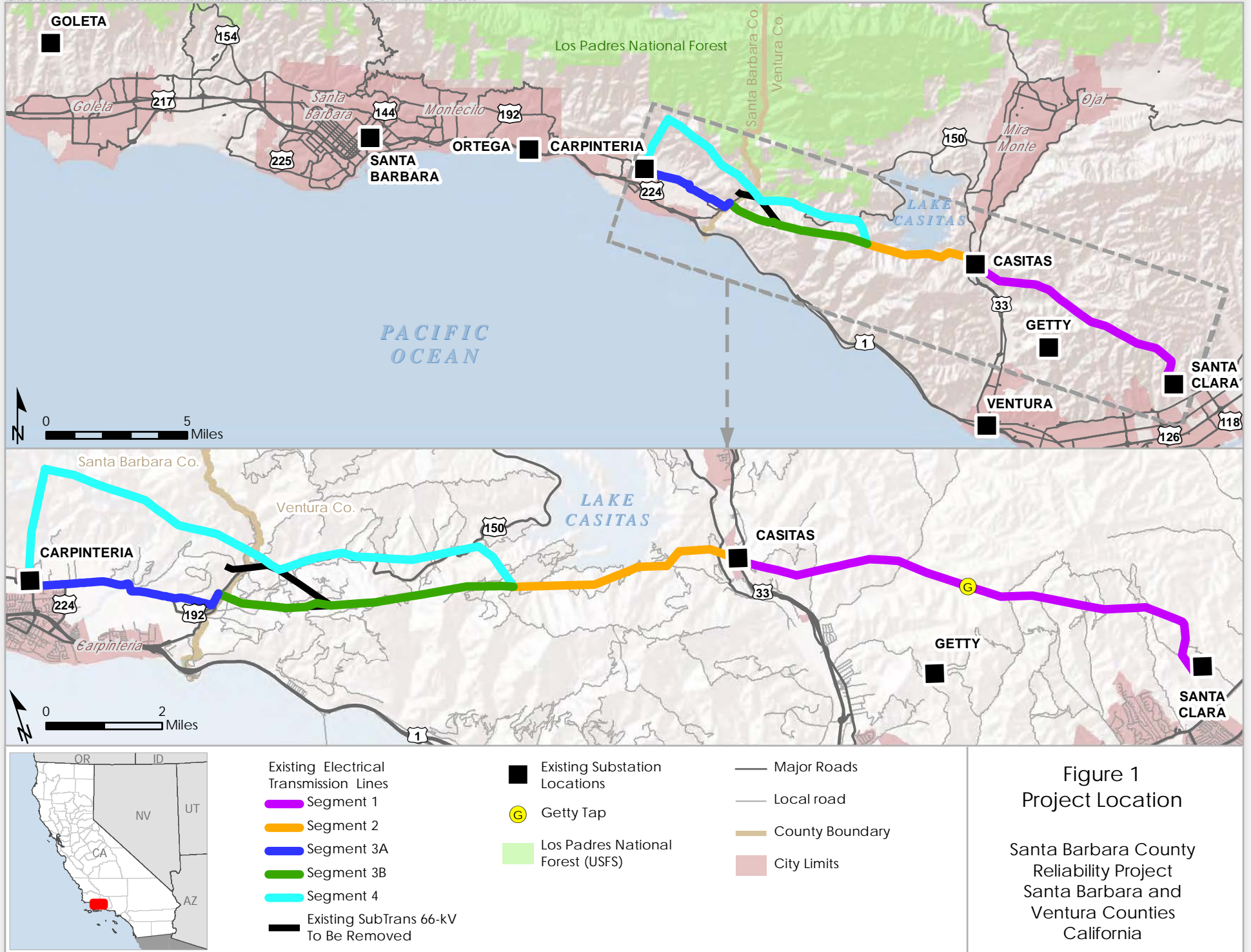


Figure 1
Project Location

Santa Barbara County
Reliability Project
Santa Barbara and
Ventura Counties
California

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B

Scoping Meeting Materials

- B.1** **Registration Sheets**
- B.2** **Example Speaker Card**
- B.3** **Example Written Comment Sheet**
- B.4** **Project Fact Sheets**

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B.1 Registration Sheets

**California Public Utilities Commission
Comisión de Servicios Públicos de California**

Public Scoping Meeting For the Proposed Santa Barbara County Reliability Project (SBCRP)
Carpinteria, May 7, 2013

Reunión Pública del Proyecto Propuesto SBCRP, Carpinteria, 7 de mayo de 2013.

Note: Before including your address, telephone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

Nota: Antes de añadir su dirección de postal, número de teléfono, dirección del correo electrónico, u otra información personal en su comentario, usted debe tomar en cuenta que su comentario entero, incluyendo identificación personal, pudiera estar disponible al público en cualquier momento. Aun cuando usted puede solicitarnos en su comentario que se mantenga su información de identificación personal como confidencial para la revisión pública, no podemos garantizar que estaremos en capacidad de hacerlo. Todos los comentarios de individuos que se identifiquen como representantes o funcionarios de organizaciones o empresas estarán completamente disponibles para inspección del público.

Name/Nombre	Affiliation/Organización	Address/Dirección	Email/Correo electrónico	Request CD of Draft EIR?/Petición para CD del Documento Preliminar de EIR
VERA BENSEN	CVA	1202 LOMITA WANE	v2.bensen@yahoo.com	✓
BILL KERSTETTER	Citizen	6957 Shepard Mesa Rd Carpinteria CA	williamkerstetter@cox.net	Yes
Valerie Caravanagh	Citizen	6957 Shepard Mesa		
Roxanne Lapidus	Citizen	1975 Craven Ln. Carpinteria	rlapidus@cox.net	Yes
Marc Chytilo	Citizen	POB 92233 SB CA 93190	Marc@COWCSB.ca	Yes

Note: Before including your address, telephone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

Nota: Antes de añadir su dirección de postal, número de teléfono, dirección del correo electrónico, u otra información personal en su comentario, usted debe tomar en cuenta que su comentario entero, incluyendo identificación personal, pudiera estar disponible al público en cualquier momento. Aun cuando usted puede solicitarnos en su comentario que se mantenga su información de identificación personal como confidencial para la revisión pública, no podemos garantizar que estaremos en capacidad de hacerlo. Todos los comentarios de individuos que se identifiquen como representantes o funcionarios de organizaciones o empresas estarán completamente disponibles para inspección del público.

Name/Nombre	Affiliation/Organización	Address/Dirección	Email/Correo electrónico	Request CD of Draft EIR?/Petición para CD del Documento Preliminar de EIR
Julie Harris	County of SB PET			
Lionel Neff	President Carpinteria			
Jackie Campbell	City of Carpinteria	5775 Carpinteria Ave. Carpinteria, CA 93013	jackiecc@ci.carpinteria.ca.us	✓

B.2 Example Speaker Card

NAME/NOMBRE:

AFFILIATION/ORGANIZACIÓN:

**California Public Utilities Commission
Comisión de Servicios Públicos de California**

Public Scoping meeting for the Proposed Santa Barbara County
Reliability Project (SBCRP)
Carpinteria, May 7, 2013

Reunión pública del proyecto propuesto SBCRP
Carpinteria, 7 de mayo de 2013

**REQUEST TO SPEAK
PETICIÓN PARA HABLAR**

NAME/NOMBRE:

AFFILIATION/ORGANIZACIÓN:

**California Public Utilities Commission
Comisión de Servicios Públicos de California**

Public Scoping meeting for the Proposed Santa Barbara County
Reliability Project (SBCRP)
Carpinteria, May 7, 2013

Reunión pública del proyecto propuesto SBCRP
Carpinteria, 7 de mayo de 2013

**REQUEST TO SPEAK
PETICIÓN PARA HABLAR**

B.3 Example Written Comment Sheet

**California Public Utilities Commission
Comisión de Servicios Públicos de California**

Public Scoping for the Proposed Santa Barbara County Reliability Project (SBCRP)
Carpinteria, May 7, 2013
Reunión Pública del Proyecto Propuesto SBCRP, Carpinteria, 7 de mayo de 2013.

Thank you for participating in tonight's public scoping. We would like to hear your comments.
Gracias por su participación en la reunión pública esta noche. Queremos oír sus comentarios.

Note: Before including your address, telephone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

Nota: Antes de añadir su dirección de postal, número de teléfono, dirección del correo electrónico, u otra información personal en su comentario, usted debe tomar en cuenta que su comentario entero, incluyendo identificación personal, pudiera estar disponible al público en cualquier momento. Aun cuando usted puede solicitarnos en su comentario que se mantenga su información de identificación personal como confidencial para la revisión pública, no podemos garantizar que estaremos en capacidad de hacerlo. Todos los comentarios de individuos que se identifiquen como representantes o funcionarios de organizaciones o empresas estarán completamente disponibles para inspección del público.

Name/Nombre: _____

Affiliation/Organización: _____

Phone/Teléfono: _____ Email/Correo electrónico: _____

Address/Dirección: _____

COMMENTS/COMENTARIOS

**Comments must be received by May 23, 2013
Los comentarios serán recibidos hasta el 23 de mayo de 2013**

Send comments to/ Envíe sus comentarios a: Lon Payne, California Public Utilities Commission
Re: SBCRP, c/o Ecology and Environment, Inc.,
505 Sansome Street, Suite 300, San Francisco, CA 94111
Fax: (415) 398-5326 Project Voicemail/Línea de atención al usuario: 855-894-8054 email/ Correo electrónico:
SBCRP.CEQA@ene.com

B.4 Project Fact Sheets



Santa Barbara County Reliability Project

Project Overview

Southern California Edison (SCE) is seeking to improve the reliability of the electrical system in Santa Barbara County during emergency conditions. To meet this goal, SCE proposes to construct the Santa Barbara County Reliability Project (SBCRP). Construction on major Project components includes:

- Segment 1** Removal of the existing tower foundations, installation of a telecommunication line, and installation of marker balls as needed
- Segment 2** Removal of the existing tower foundations, installation of a telecommunication line, and installation of marker balls as needed
- Segment 3A** Removal of wooden poles and installation of fault return conductor on existing lightweight steel poles
- Segment 3B** Replacement of the existing 66-kv subtransmission structures with single-circuit tubular steel poles, primarily within existing utility rights-of-way, and installation of marker balls as needed.
- Segment 4** Replacement of existing 66-kv subtransmission structures with double-circuit tubular steel poles within existing utility rights-of-way, installation of a telecommunications line, and installation of marker balls as needed.
- Getty Tap** The Getty Tap would connect the Getty Substation, which is currently connected to an adjacent 66-kV line, to the Segment 1 66-kV line. The adjacent line would be idled upon project completion.

In addition, the proposed project would require modification of subtransmission and substation equipment within the Carpinteria, Casitas, and Santa Clara substations; replacement of line protection relays within substation equipment rooms or cabinets at Getty,

Goleta, Ortega, and Santa Barbara substations; and installation of telecommunications facilities at Carpinteria, Casitas, Santa Clara, and Ventura substations.

SCE has submitted an application for a project permit to the California Public Utilities Commission (CPUC). If the project is approved, construction is anticipated to begin in July 2013 and would take place over a two year period. Maps on the other side of this fact sheet show where the elements of the project would be constructed.

Environmental Impact Assessment

The CPUC will review SCE's project application and consider whether the project is needed and is in the public interest. Under the California Environmental Quality Act (CEQA), the CPUC is also required to evaluate the project's potential impacts to the environment. At the same time the CPUC is reviewing the project application, the CPUC will also prepare an environmental analysis for the project consistent with CEQA. The CPUC would prepare either an Environmental Impact Report (EIR) or Initial Study (IS)/Mitigated Negative Declaration (MND). The EIR would describe the nature and extent of the environmental impacts of the SBCRP and project alternatives, and would discuss mitigation measures.

For more information...

Email: SBCRP.CEQA@ene.com

Mail: Attn: Lon Payne

California Public Utilities Commission

Re: SBCRP, c/o Ecology and Environment, Inc.,

505 Sansome Street #300, San Francisco, CA 94111

Fax: (415) 398-5326

Hotline: (855) 398-5326



C

Summary of Comments from Tribal Representatives

- C.1 Registration Sheet
- C.2 Summary of Comments

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**Appendix C is confidential and is on file
with the Lead Agency**

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D

Comment Letters

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From: Marc Chytilo [mailto:marc@lomcsb.com]
Sent: Tuesday, April 30, 2013 5:15 PM
To: Hodgkins, Claire
Cc: Ana Citrin; William Kerstetter
Subject: SBC Reliability Project

Mr. Payne – we did not receive notice of the NOP, despite this office being deeply involved in this project, having intervened as a party in the PUC proceedings, and having been in regular communication with PUC staff and counsel over aspects of this project. I received a forwarded copy of the notice today, dated 4/23/13 re: NOP, from the Santa Barbara County Planning and Development Department as a courtesy.

I'm not sure how we are not on the list, but please place myself, Ana Citrin and William Kerstetter – each copied on this email – on the public notification list for all proceedings pertaining to the SCE SBC reliability project. We will submit our scoping comments by the May 23 deadline

Please confirm receipt of this email and placement on your CEQA processing and project notification lists.

Thank you

Marc

* * * * *

If you believe you have received this message in error, please notify sender immediately.

* * * * *

Marc Chytilo
Law Office of Marc Chytilo
Post Office Box 92233
Santa Barbara, California 93190
Phone: (805) 682-0585 · Fax: (805) 682-2379
Email: Marc@lomcsb.com

Message scanned by the Symantec Email Security service. If you suspect that this email is actually spam, please send it as an ATTACHMENT to spamsample@messagelabs.com

From: david fishman [mailto:dfishman.carp@gmail.com]
Sent: Thursday, May 02, 2013 1:47 PM
To: Hodgkins, Claire
Subject: Edison Poles

In regard to CPUC'S inquiry into Edison's poles and wires, there should be a EIR to address these project impacts...

1. Visual and aesthetic impacts to the scenic and rural inland Carpinteria Valley
2. The need to consider undergrounding in the most scenic areas
3. Destruction and disturbance of cultural resources

Sincerely

David and Monica Fishman

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-----Original Message-----

From: Valerie Cavanaugh [mailto:valeriecavanaugh@cox.net]

Sent: Friday, May 03, 2013 11:19 AM

To: Hodgkins, Claire

Cc: William Kerstetter

Subject: Southern California Edison Powerline Project Comment

Dear CPUC,

I would like to provide my vehement opposition to both the illegally installed SCE power poles and lines in Carpinteria as well as the proposed expansion. SCE went ahead with this project with the high-handedness of a behemoth which felt immune from any governmental, community or civic involvement and felt free to flout all regulatory oversight.

In my view, quite literally, there is a drastic degradation of the beautiful Carpinteria view shed by the addition of these industrial type steel poles and heavy gauge wires. This project is utterly unsuitable to be slashed across our bucolic, rural landscape, which is within the protected Coastal Zone. SCE knowingly chose to proceed without seeking a permit in order to present the matter as a fait accompli which it would cost too much to correct. It would be craven for the CPUC to permit them to benefit from this behavior. The utility should be required to do an environmental impact assessment which, I should hope, will lead to the requirement that they underground the poles.

Very truly yours,

Valerie Cavanaugh

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-----Original Message-----

From: Fred Ali [mailto:fredjohnali@gmail.com]

Sent: Friday, May 03, 2013 6:49 PM

To: Hodgkins, Claire

Subject: SCE Powerline Project

As a frequent visitor to the Carpinteria area, I am writing to:

A. Express my concern with the SCE Power line Project, which I understand was begun without proper regulatory approval; B. Express my strong support for a complete and transparent EIR to address all potential project impacts.

Of particular concern are the following potential impacts and considerations which deserve thorough review:

A. The visual and aesthetic impacts of the project; B. Increased risk to bicyclists and other recreational users; C. Consideration of underground placement of wires, etc. to protect the natural resources and appeal of the area.

For many years my family and I have enjoyed and come to treasure the beauty of the Carpinteria area, and in particular, Shepard Mesa around Highway 192. I am an avid bicyclist, and this is one of my favorite areas to enjoy my sport. I am also the President of a private Foundation that has made many grant related investments in Santa Barbara County, all with the purpose of enhancing and safeguarding the health and well being of the people in this area. Given the potential of serious impact to this area, an EIR should be prepared as required by law.

Sincerely,

Fred Ali

President and CEO
Weingart Foundation
Los Angeles California

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From: Lionel Neff [mailto:zuma13@msn.com]
Sent: Sunday, May 05, 2013 3:55 PM
To: Hodgkins, Claire
Cc: Bill Kerstetter
Subject: IN SUPPORT OF EIR FOR SCE POLES

To Concerned Parties,

I reside at 6953 Shepard Mesa Rd in Carpinteria, California. I am quite familiar with the metal poles installed by Southern California Edison. The unsightly, bright silver, metal poles, replaced shorter wooden poles that were unobtrusive and blended in with the surrounding flora and natural vistas. The original wooden poles were only used for distribution of electricity to local residents. The newly installed metal poles obviously expanded upon the original poles permitted us by virtue of the fact the new poles are substantially taller, have considerably more and thicker wires (replaced distribution lines with transmission lines), and have drastically impacted the view corridor of what was once a pristine agricultural reserve at the base of the beautiful Carpinteria foothills. Not only do these new poles pose a dire impact to the visual aesthetics of the area, these poles conflict with the County Local Coastal Plan and zoning ordinances that favor placing transmission lines underground. The poles also contribute to the destruction of cultural resources. The poles have a negative impact and increase the risks to the safety of bicyclists, impair the views for hikers and equestrians, contribute to the diminution of bird populations, and increase risks to hang gliders. For the above stated reasons I support the requirement that SCE be compelled to submit an Environmental Impact Report.

In advance I thank you for reviewing this submission.

Lionel B. Neff

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From: avoranchr@aol.com [mailto:avoranchr@aol.com]
Sent: Monday, May 06, 2013 5:36 PM
To: SB CRP.CEQA@ene.com.
Subject: Santa Barbara county reliability project Lon Payne

Dear Mr. Payne, My name is David Lelande and my address is P.O. box 1202 Carpinteria, Ca. my phone number is 805-680-6345. I farm a piece of land at 6730 Casitas pass rd. in Ventura co. This parcel will be impacted by the segment 4 of said project, aside from the devastating effects that this project will have on my views, my main concern is with the fact that Edison is replacing one segment of this transmission system because of landslides and placing a new transmission pole in my access road in an area that is clearly marked on all geological survey maps as an active landslide. I have pointed this out to Edison many times for many years but generally feel I'm wasting my breath. I feel that I must make this fact known to someone else [other than Edison] to try to limit my liability if something should happen. Thank you for listening to my concerns, David Lelande.

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From: Kenneth Weiss [mailto:kennethr.weiss@gmail.com]

Sent: Monday, May 06, 2013 11:27 PM

To: Hodgkins, Claire

Cc: Nancy Baron

Subject: Re: EIR needed for SCE Powerline Project through the hills near Carpinteria, CA

To Concerned Parties,

How is it possible that Southern California Edison could erect giant steel poles and string thick power lines through a rural residential neighborhood without obtaining a permit from either Santa Barbara County, or the California Public Utilities Commission? Why wasn't such a project flagged by the California Coastal Commission, given how these backup transition lines bisect the coastal zone's scenic Carpinteria Valley with something that would typically be located in remote back-country areas or industrial zones?

Legal experts who have studied the matter tell us that the transmission lines conflict with the Local Coastal Plan and zoning ordinances. The neighbors of these transmissions lines are understandably upset by the significant aesthetic impacts of the view-disrupting towers and transmission lines.

As Santa Barbara County residents, living on Shepard Mesa Road, we see the lines every day and drive or bicycle by the imposing poles planted perilously close to the twisting, narrow country roads connecting our home to the city of Carpinteria. We don't know if these lines pose significant impacts on local flora and fauna. We believe as a rule, that the foundation of the best public policy is to collect the relevant information. So as local residents, taxpayers and SCE ratepayers, we urge that an environmental impact report be prepared so that appropriate authorities have the right information to form the best decision.

Thank you for your consideration.

Ken Weiss & Nancy Baron

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California Public Utilities Commission
Comisión de Servicios Públicos de California

Public Scoping for the Proposed Santa Barbara County Reliability Project (SBCRP)
Carpinteria, May 7, 2013
Reunión Pública del Proyecto Propuesto SBCRP, Carpinteria, 7 de mayo de 2013.

Thank you for participating in tonight's public scoping. We would like to hear your comments.
Gracias por su participación en la reunión pública esta noche. Queremos oír sus comentarios.

Note: Before including your address, telephone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

Nota: Antes de añadir su dirección de postal, número de teléfono, dirección del correo electrónico, u otra información personal en su comentario, usted debe tomar en cuenta que su comentario entero, incluyendo identificación personal, pudiera estar disponible al público en cualquier momento. Aun cuando usted puede solicitarnos en su comentario que se mantenga su información de identificación personal como confidencial para la revisión pública, no podemos garantizar que estaremos en capacidad de hacerlo. Todos los comentarios de individuos que se identifiquen como representantes o funcionarios de organizaciones o empresas estarán completamente disponibles para inspección del público.

Name/Nombre: VERA BENSEN

Affiliation/Organización: CVA Carpinteria Valley Association

Phone/Teléfono: 805 684 5215 Email/Correo electrónico: v2bensen

Address/Dirección: 1202 LOMITA LANE

COMMENTS/COMENTARIOS

I BELIEVE THAE EDISON NEED A COUNTY PERMIT TO CONSTRUCT OR BUILD ANY PROJECT. AND, SINCE THEY DID NOT GET A PERMIT TO CONSTRUCT THE VERY HIGH ELECTRICAL POLES ON HWY 192 GOING UP TO SHEPARDS MESA, THEN IN ORDER TO GET A PERMIT FOR THEIR NEW PROJECT ON OUR FOOTHILLS, I THINK THEY SHOULD

Comments must be received by May 23, 2013

Los comentarios serán recibidos hasta el 23 de mayo de 2013

HAVE TO BURY THE HIGH POLES ON HWY 192.

Send comments to/ Envíe sus comentarios a: Lon Payne, California Public Utilities Commission

Re: SBCRP, c/o Ecology and Environment, Inc.,

505 Sansome Street, Suite 300, San Francisco, CA 94111

Fax: (415) 398-5326 Project Voicemail/Línea de atención al usuario: 855-894-8054 email/ Correo electrónico:

SBCRP.CEQA@ene.com

4-30-13

Patrick Tumamait
Native Chumash Consultant
992 EL Camino Corto
Ojai, CA. 93023
(805) 216-1253

RE: To the (CPUC)(LON Payne) and the applicant (SCE) for the (SBCRP)

In response to your letter, I would like to see an (IS) Independent Study done to prove or disprove to the general public and the Native Chumash Community whether or not a (MND) is appropriate. I recommend that the Native Chumash Community and the (CPUC) work hand in hand to achieve an (E.I.R.) that everyone is satisfied with so we can move forward. I also would like to see a (MOA) between the applicant (SCE) and a Native Chumash representative take place before a (PTC) is issued. This would protect all parties involved.

If you have any questions, please don't hesitate to call.

Thank you,

Patrick Tumamait 4-30-13

Patrick Tumamait

From: avoranchr@aol.com [mailto:avoranchr@aol.com]
Sent: Saturday, May 11, 2013 4:04 PM
To: Hodgkins, Claire
Cc: tortola111@aol.com
Subject: Concerns related to .s.b.c.r.p

Dear Mr. Payne,

My name is David Lelande I reside in Carpinteria and farm property I own in Ventura co. This land will be impacted by the SCE Santa barbara co, reliability project. My phone # is 805-680-6345. You and I meet last Tues. nite 5-7-13 at the Carpinteria City Hall. we discussed Edisons plans for enlarging their transmission line that runs across my property. You asked if I would send you a more detailed list of my concerns. My concern is with the location of the pole on parcel# 008-0-200-26 of segment 3B of the project, or if you have Edisons details bore hole # b-12 on the notification of geotechnical test. Since our meeting I have had many ongoing and new concerns, those of which I would like to list for you review.

1. The devastating effect on mine and my neighbors property in relation to views and property value.
2. The fact that the pole relocation is in a spot clearly marked as an active landslide by the U.S.G.S and C.G.S. maps, and this fact is know by all geologists and soil engineers.
3. Edison's choosen location for said pole is on a curve of my daily ingress and egress road which ofcourse is the easiest and cheapest spot. However this location aside being in a landslide could interfere with my daily use. In the many years leading up to this time Edison representatives have assured me that they would relocate this pole to a more desirable location, but never in writing. I have asked them if they would move the easement to the north 30 or 40 feet, helping with my view corridor and situating the pole on more stable ground, their response has been totally negative. They have told me it would be impossible to obtain the easement and the line needed to be straight. However after our meeting I noticed that one of my neighbors, Mr. Randolf Siple a retired attorney, had gotten Edison to make a large curve around his property. This being the pink line listed as the "proposed new easement " on your map. Very interesting to say the least!
4. I also have great concern after closer examination of the "removal of existing sub trans 66KV line" The way it looks to me, Edison is planning to link back to the rest of those remaining lines when things calm, divide and conquer is their usual MO. This would make the line running thru my property a 6 wire rather than the proposed 3 wire. Edison claims this is all they want but will not put that in writing either. If indeed it is a major 6 wire transmission line it would clearly burden the existing 50 ft. easement.
5. As you said, you are aware that I have had problems with Edison burdening a separate easement I have for ingress and egress thru my lower neighbors (3) properties. These neighbors do not want Edison to access this project thru their properties and would be in their rights to have my easement revoked if Edison continues to burden this easement. Edison as of late has honored their wishes and has been accessing my property thru the easement they hold to access those transmission lines. If you would ever like to review those easements please let me know.

Mr. Payne I am sorry to burden you with all these problems but being a dumb farmer I have no idea how I can remedy these issues and would greatly appreciate your help. Edison's PR people have been very polite but you can see they really have no interest in my concerns,

Thank you, David Lelande
P.O box 1202
Carpinteria Calif. 93014
E-mail avoranchr@aol.com

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From: Roberta & George Lehtinen [mailto:lehtinen1@verizon.net]
Sent: Wednesday, May 15, 2013 9:46 PM
To: Hodgkins, Claire
Subject: CEQA Document Scope Comments on Segment 3A

Friends,

A notice of a 66 kV power line project was posted near the entry to my housing development in Carpinteria. I believe that Segment 3A of that project involves replacing some of the pole line work along Foothill Road between Casitas Pass Road and Linden Avenue, also in Carpinteria. My housing development named Seacoast Village, has its only non-emergency entrance (Seacoast Way) in that same segment of Foothill Road. We have an emergency gate that would require the City of Carpinteria to remove some bollards from their park service road in order for automobiles to access the city street (El Carro Lane.)

Comment 1: If Foothill Road expected to be closed or partially closed to traffic during that pole line work, it is necessary that the utility coordinate with the City of Carpinteria to allow our residents to come and go through the emergency gate and park service road in El Carro Park to reach El Carro Lane..

Comment 2: In addition, it is necessary that effective traffic control measures be applied to prevent drivers from attempting to use our Seacoast Village Streets as a bypass around the construction. Our private streets are narrow, lightly constructed and frequently have children playing on them. They are not suitable for heavy traffic especially the considerable heavy truck traffic from the many plant nurseries and growers along Foothill Road.

Comment 3: There are also occasional residences, a private elementary school and a girl's club in that segment of Foothill Road that must be considered in a traffic plan. Foothill Road is also a major access route to the city high school located on Foothill Road just west of the intersection of Linden Avenue and Foothill Road for which traffic planning is required.

Comment 4: A complete traffic plan needs to be included for public review and comment in the next document.

Please keep me apprised of subsequent document issuance and review periods.

George Lehtinen
1574 Seacoast Way
Carpinteria, CA 93013
(805) 684-0072

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From: Roberta & George Lehtinen [mailto:lehtinen1@verizon.net]
Sent: Friday, May 17, 2013 2:56 PM
To: Hodgkins, Claire; mulroy@cox.net; Ana Blair; Gary Carroll; Gabe Saglie
Subject: Re: CEQA Document Scope Comments on Segment 3A

Folks,

You probably noticed the sign to the west of our entrance road. It announces some power line work along Foothill that might involve closure or partial closure of our way in and out of SV. I sent some comments on the EIR earlier but they were too early for the comment window so the message below is a restatement of that prior message. Any other comments on the aesthetics, air quality, biological resources, cultural resources and traffic need to be sent in before May 23.

George

From: Roberta & George Lehtinen <lehtinen1@verizon.net>
To: "SBCRP.CEQA@ENE.COM" <SBCRP.CEQA@ENE.COM>
Sent: Wednesday, May 15, 2013 9:46 PM
Subject: CEQA Document Scope Comments on Segment 3A

Friends,

A notice of a 66 kV power line project was posted near the entry to my housing development in Carpinteria. I believe that Segment 3A of that project involves replacing some of the pole line work along Foothill Road between Casitas Pass Road and Linden Avenue, also in Carpinteria. My housing development named Seacoast Village, has its only non-emergency entrance (Seacoast Way) in that same segment of Foothill Road. We have an emergency gate that would require the City of Carpinteria to remove some bollards from their park service road in order for automobiles to access the city street (El Carro Lane.)

Comment 1: If Foothill Road expected to be closed or partially closed to traffic during that pole line work, it is necessary that the utility coordinate with the City of Carpinteria to allow our residents to come and go through the emergency gate and park service road in El Carro Park to reach El Carro Lane..

Comment 2: In addition, it is necessary that effective traffic control measures be applied to prevent drivers from attempting to use our Seacoast Village Streets as a bypass around the construction. Our private streets are narrow, lightly constructed and frequently have children playing on them. They are not suitable for heavy traffic especially the considerable heavy truck traffic from the many plant nurseries and growers along Foothill Road.

Comment 3: There are also occasional residences, a private elementary school and a girl's club in that segment of Foothill Road that must be considered in a traffic plan. Foothill Road is also a major access route to the city high school located on Foothill Road just west of the intersection of Linden Avenue and Foothill Road for which traffic planning is required.

Comment 4: A complete traffic plan needs to be included for public review and comment in the next document.

Please keep me apprised of subsequent document issuance and review periods.

George Lehtinen
1574 Seacoast Way
Carpinteria, CA 93013
(805) 684-0072

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From: Tom Mulroy [mailto:mulroy@cox.net]

Sent: Friday, May 17, 2013 6:44 PM

To: 'Roberta & George Lehtinen'; Hodgkins, Claire; 'Ana Blair'; 'Gary Carroll'; 'Gabe Saglie'

Subject: RE: CEQA Document Scope Comments on Segment 3A

Thanks George. Those are important comments. Best wishes, Tom



Santa Barbara County
Air Pollution Control District

May 17, 2013

Lon Payne
California Public Utilities Commission
RE: Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Re: APCD Response to Notice of Preparation of a Draft Environmental Impact Report for the Southern California Edison Santa Barbara County Reliability Project

Dear Mr. Payne:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) or Mitigated Negative Declaration for the Southern California Edison Santa Barbara County Reliability Project. The proposed project consists of the following major components:

- Reconstruct existing 66 kV subtransmission facilities within existing and new utility rights-of-way (ROW) between the existing Santa Clara Substation in Ventura County and the existing Carpinteria Substation located in the City of Carpinteria in Santa Barbara County.
- Modify subtransmission, substation, and/or telecommunications equipment within the existing Carpinteria Substation, Casitas Substation, Getty Substation, Goleta Substation, Ortega Substation, Santa Barbara Substation, Santa Clara Substation, and Ventura Substation.
- Replacement of line protection relays within existing substation equipment rooms at some substations.
- Install fiber optic telecommunications equipment for the protection, monitoring and control of subtransmission and substation equipment.
- Installation of fault return conductor along Segment 3A (Carp).
- Removal of obsolete subtransmission infrastructure along route.
- No stationary combustion devices such as generators are currently proposed.
- No increase in employee trips is anticipated for operation of the proposed project, which consists primarily of remote monitoring.

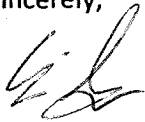
APCD's guidance document, entitled *Scope and Content of Air Quality Sections in Environmental Documents* (updated December, 2011) is available online at www.sbcapcd.org/apcd/landuse.htm. This document should be referenced for general guidance in assessing air quality impacts in the Draft EIR. The environmental document should evaluate the following potential impacts related to the Santa Barbara County Reliability Project:

1. Construction Impacts. The EIR should discuss the potential air quality impacts associated with construction activities for the proposed project. APCD's December, 2011 *Scope and Content* document, Section 6, presents recommended mitigation measures for fugitive dust and equipment exhaust emissions associated with construction projects. Construction mitigation measures should be enforced as conditions of approval for the project. The EIR should include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigations and establishes a mechanism for enforcement.

2. Asbestos Reporting Requirements. If the project will involve any demolition or renovation of existing structures or foundations, the EIR should discuss notification and reporting requirements pursuant to APCD Rule 1001 – National Emission Standards for Hazardous Air Pollutants (NESHAP) – Asbestos.

We hope you find our comments useful. We look forward to reviewing the Draft EIR. Please contact me at (805) 961-8893 or by e-mail at edg@sbcapcd.org if you have questions.

Sincerely,



Eric Gage
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Project File
TEA Chron File

LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

May 23, 2013

Mr. Lon Payne
California Public Utilities Commission
RE: Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite # 300
San Francisco, California 94111

By Email: SBCRP.CEQA@ene.com

RE: Scoping Comments to SCE Reliability Project

Mr. Payne and the California Public Utilities Commission:

This office represents Mr. William Kerstetter regarding the Santa Barbara County Reliability Project (hereafter "Project"). Mr. Kerstetter has been involved in this and related projects for over a decade, beginning when SCE began expanding its transmission and distribution facilities in the Shepard Mesa area of Carpinteria in 1998 without the benefit of permits, environmental review or community notification. Regrettably, SCE installed a considerable amount of expanded infrastructure (thicker conductors, wider and taller poles) before the CPUC, County of Santa Barbara and California Coastal Commission's jurisdiction was asserted. The effect of this unpermitted activity has been a substantial impact upon the pre-Project visual landscape.

SCE has further alleged various serial "emergencies" to justify upgrading of other existing facilities under County jurisdiction, including upgrading some poles now included as part of the Project that also carry County-regulated distribution lines, in addition to the transmission lines associated with the Project. Rather than replacing the then-existing facilities with like-kind substitutes as might have been allowable, SCE has routinely abused the maintenance and replacement permit and CEQA exemptions by expanding and upgrading the capacity, gauge, width, materials and height of these related replacement facilities, each with attendant increased environmental impacts. This practice has incrementally piecemealed portions of the Project and caused significant cumulative changes to the character, visual and scenic resources where this practice has occurred, which have been directly largely at the Shepard Mesa area. The magnitude of the impact to this particular community is disproportional when compared to other portions of the Project and cumulatively significant. The disproportional nature of this impact is reflected in the fact that these changes prompted Mr. Kerstetter and others in the Shepard Mesa area to investigate this issue and demonstrate the existence of County, Coastal Commission and the Public Utilities Commission regulatory jurisdiction over these projects, as should have been recognized in 1998.

We believe it is critically important that the CPUC consider the effects of these serial, unpermitted projects as part of the Project's environmental review process for and to use the pre-

MARC CHYTILO
P.O. Box 92233 • Santa Barbara, California 93190
Phone: (805) 682-0585 • Fax: (805) 682-2379
Email: Marc@lomcsb.com

Project conditions in 1998 as the baseline for environmental review to ensure that SCE does not benefit from their improper unpermitted activities. Further, we ask that the CPUC's environmental review document recognize the significant, adverse impacts associated with the unpermitted development during the period 1998 to 2004, and identify Project alternatives and mitigation measures to specifically address and compensate for those impacts. Finally, we implore the CPUC to consider the cumulative effects of the Project in combination SCE's other projects in the area up to the present, and identify both alternatives and mitigation measures to reduce those cumulative Project impacts.

These comments supplement our oral comments presented at the May 7 scoping hearing.

Prepare an EIR

“The foremost principle under CEQA is that the Legislature intended the act ‘to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.’” (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259.) “The EIR requirement is the heart of CEQA.” (Cal. Code Regs., tit. 14¹, § 15003 (a).) “The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.” (Pub. Res. Code § 21061.) The EIR serves to “inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made”, protecting the environment as well as informed self-government. (*Citizens for Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal. 3d 553, 564 (emphasis in original).) CEQA “creates a low threshold requirement for initial preparation of an EIR and reflects a preference for resolving doubts in favor of environmental review when the question is whether any such review is warranted.” (*League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal. App. 4th 896, 904-905; Public Resources Code § 21151.)

An agency's decision to adopt a negative declaration is reviewed under the “fair argument” test. (*Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151.) Pursuant to this test, an agency is required to prepare an EIR instead of a negative declaration if the record contains substantial evidence supporting a fair argument that the project *may* have a significant effect on the environment. (*League for Protection*, 52 Cal. App. 4th at 904.) “‘Significant effect on the environment’ means a substantial, or potentially substantial, adverse change in the environment.” (Pub. Res. Code § 21068.) The fair argument test does not require that the evidence received by the agency affirmatively prove that significant environmental impacts *will* occur, only that there is a *reasonably possibility* that they will occur. (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d 296, 309.) Moreover, “[i]f there

¹ This code section is referred to hereafter as “Guidelines” or “CEQA Guidelines”.

was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration.” (*Id.* at 310 (quoting *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002).)

“Substantial evidence . . . means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (CEQA Guidelines, § 15384 (a).) “Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” (*Id.* at subd. (b); Pub. Res. Code § 21080 (e)(1-2).) “Relevant personal observations of area residents on nontechnical subjects may qualify as substantial evidence for a fair argument.” (*Pocket Protectors*, 124 Cal. App. 4th at 928 (citing *Ocean View Estates*, 116 Cal.App.4th at 402).) “[I]f substantial evidence supports a fair argument that the proposed project conflicts with policies [adopted for the purpose of avoiding or mitigating an environmental effect] this constitutes grounds for requiring an EIR.” (*Pocket Protectors*, 124 Cal.App.4th at 930; CEQA Guidelines, App. G, § IX (b).)

Since this step of scoping in the CEQA process only addresses the preliminary question of whether to prepare an EIR and what environmental issues to evaluate, Commenters do not submit herewith substantial evidence. We seek at this point to implore the CPUC to prepare an EIR, and to prepare a wide-ranging and robust EIR for this project. SCE’s PEA acknowledges the need for an EIR by its reference to Guidelines § 15126.6 and the requirement of consideration of alternatives. PEA, page 1-5; 1-14.² We do not believe there is a question about whether an EIR must be prepared, but instead, what should be its scope and the issues considered.

Include the Entire Project

SCE has chosen to exclude parts of this project without justification. The upgraded lines in Santa Barbara County but outside of the coastal zone are part of the Project, and, if for nothing else, for cumulative impact analysis. It would appear that the PEA has sought to exclude as much of the project as possible from analysis. For example:

SCE commenced construction of the Project in 1999 under the assumption that the Project was exempt from permitting pursuant to California Public Utilities Commission (CPUC) General Order (G.O.) 131-D and the California Coastal Act

² (“CEQA and the CEQA Guidelines (Section 15126.6(a)) require that an environmental impact report describe a reasonable range of alternatives to a proposed project or the location of the proposed project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines Section 15126.6(d) requires that sufficient information about each alternative be included to allow meaningful evaluation and analysis.”)

(California Public Resources Code section 30000 et seq). Between 1999 and 2004, the following portions of the Project were constructed: (i) some substation upgrades at Carpinteria Substation, Santa Clara Substation, Goleta Substation, Ortega Substation and Isla Vista Substation; and (ii) approximately 18 miles of reconstructed 66 kV subtransmission infrastructure from Santa Clara Substation to just west of Lake Casitas in Ventura County, and from the Ventura County line west to Carpinteria Substation in Santa Barbara County.

PEA, Page 1-2.

Similarly, in the land use section of the PEA, SCE contends:

Work would also be performed at Getty Substation, Goleta Substation, Ortega Substation, Santa Barbara Substation, and Ventura Substation; all of this work would be conducted within the existing MEERs at these substations. This work would be conducted inside existing facilities on SCE-owned properties, and would have no bearing or potential impact on surrounding land uses or zoning.

Page 4-295.

CEQA mandates that the lead agency consider “the whole of an action” and not allow piecemealing, whereby a larger project is broken into a series of smaller projects. See generally Guidelines § 15165; *City of Santee v. County of San Diego* (1989) 214 Cal. App. 3d 1438, 1450-1455. SCE must not be allowed to continue to engage in piecemealing of its south coast projects.

Residents of Shepard Mesa have suffered direct and disproportionate impacts as a result of SCE’s misuse of exemptions and failure to secure proper permitting, including complying with CEQA and employing impact avoidance and mitigation strategies and consideration alternatives. SCE’s proposed exclusion of portions of the project is inexplicable and serves to improperly understate the Project’s individual and cumulative impacts to the region.

Address Temporal impacts

As the PEA admits, this project was begun in 1998, but only stopped in 2004 when the California Coastal Commission’s jurisdiction was recognized. As noted herein, the improper initiation and partial completion of the Project without the benefit of an environmental review process or CEQA compliance has substantially degraded some of the area’s visual resources and scenic character. We are hopeful that the CPUC’s process will result in a project that avoids significant impacts and includes mitigation measures, but these do not necessarily address past temporal impacts. These should be identified in the EIR as a separate impact category and addressed through compensatory mitigation.

The Proper Baseline for the Analysis of Impacts

As mentioned at the Carpinteria Scoping hearing, Commenters wish to provide their view on the question of whether the EIR should use an environmental baseline that includes the illegally constructed portions of the project. For obvious reasons, to do so would reward SCE's conduct and largely rob the CEQA process of meaning. To do so would also violate CEQA.

"To decide whether a given project's environmental effects are likely to be significant, the agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the "baseline" for environmental analysis." (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 315.) "[A]n agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review . . . for support by substantial evidence." (*Id.* at 328.) An agency abuses its discretion if it uses a baseline that "mislead[s] the public as to the reality of the impacts and subvert[s] full consideration of the actual environmental impacts". (*Id.*, at 322, quoting *Environmental Planning & Information Council v. County of El Dorado* ("EPIC") (1982) 131 Cal. App. 3d 350, 358.)

Pursuant to CEQA Guidelines § 15125, the baseline "normally" consists of "the physical environmental conditions in the vicinity of the project, as they exist at the time ... environmental analysis is commenced" Courts have upheld the agency's use of a baseline other than existing conditions at the time environmental review is commenced where that 'normal' baseline would have been misleading and illusory under the circumstances. (*See e.g. Fairview Neighbors v. County of Ventura* (1999) 70 Cal. App. 4th 238, 243 ("[d]iscussing the possible environmental effects of the project based on actual traffic counts would have been misleading and illusory under the facts here [where t]he flow of traffic for a mining operation fluctuates considerably".))

In this case, SCE began construction on the project now under review *before* environmental analysis was commenced. Accordingly, PUC cannot utilize the "normal" baseline of conditions existing at the commencement of environmental review because to do so would fail to compare the Project with the environment's state absent the project, misleading the public as to the Project's true environmental impacts. (*See Communities for a Better Environment*, 48 Cal. 4th at 315, 321.) Instead, to accurately reflect the Project's environmental impacts, PUC must use the environmental conditions existing immediately prior to commencement of Project construction.

SCE may argue that a line of authority including *Eureka Citizens v. City of Eureka* (2007) 147 Cal. App. 4th 357, *Fat v. County of Sacramento* (2002) 97 Cal. App. 4th 1270, and *Riverwatch v. County of San Diego* (1999) 76 Cal. App. 4th 1428, supports using the physical conditions at the time environmental review commenced. Generally, these cases stand for the proposition that "[p]rior code or zoning violations *unrelated to the current application* need not be considered in evaluating a new application." (*See Eureka*, 147 Cal. App. 4th at 371 and fn. 19 (emphasis added) citing *Baird v. County of Contra Costa* (1995) Cal.App.4th 1464, 1471.) The courts in *Eureka*, *Fat*, and *Riverwatch*, upheld agency decisions to include *prior* development or

activity in the EIR's environmental baseline, despite the fact that that prior development or activity was alleged to have occurred illegally (i.e. without permits). The illegal activity at issue in these cases existed at the time environmental review was commenced, but was not part of "the project" undergoing environmental review. Moreover, in each of these cases, the court deferred to the agency's choice of baseline and determined that substantial evidence supported that choice based on the particular facts of each case. As such, these cases do not authorize PUC's use of a baseline that includes some or all of the Project that is presently subject to environmental review.

Impact areas

1. Visual and aesthetic impacts to the scenic and rural coastal zone of Carpinteria Valley and the Los Padres National Forest

The Project is proposed in a highly scenic area of southern California. It includes portions of the Los Padres National Forest and the coastal zone, crosses and is visible from California State Highway 150, which is designated on the California highways master plan and Santa Barbara County Scenic Highways Element of the General Plan as eligible for scenic highway designation.

The Project's poles, conductors (wires), and support facilities will have a number of impacts to this sensitive scenic area in the following ways:

- a. Blockage of views and scenic vistas
- b. Degradation of scenic vistas
- c. Introduction of overhead Clutter
- d. Inducement of additional impacts from the addition of more wires
- e. Glare off the wires and poles
- f. Linear view impacts – looking along sets of lines and from the reorientation of vertical conductors onto horizontal planes
- g. Cumulative impacts from similar projects in the Project reach, including a possible second circuit
- h. Impacts to views up and from the Los Padres National Forest
- i. Impacts to views to the Ocean
- j. Impacts to views from Roads
- k. Impacts to views from Recreational areas

Since the Project is located in and near public lands and areas where the Project will impact visual resources, CPUC must also consider the Project's effects on private views as well. *Ocean View Estates Homeowner's Association v. Montecito Water District* (2004) 116 Cal. App. 4th 396, 403-404.

2. Air quality

The environmental review document must address the effect of new state and federal new ambient air quality standards on regional attainment and the effect of global warming on ambient air quality, the exacerbation of unusual air quality episodes, such as wildfire, leading to adverse public health effects.

3. Biological resources including native chaparral plants, terrestrial animals, birds, riparian plants and animals, rare, threatened and endangered species

As noted in the PEA, the Project will have significant impacts on biological resources. Avoidance should be the first strategy. For impacts that cannot be avoided, mitigation in the form of compensatory habitat should be identified early, and habitat restoration undertaken before the impacts to reduce temporal losses to biological resources that are expected to utilize replacement habitat.

4. Destruction and disturbance of cultural resources

The Project involves impacts to lands with cultural, historical, archaeological and cultural landscape significance. While the typical direct and cumulative impacts are expected to be recognized in the EIR, the Project landscape's status as a cultural and historical landscape should be specifically evaluated. See <http://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/> for explanation of cultural and historical landscapes and the analysis that should be employed. The Project reach has experienced thousands of years of occupation and played significant roles in the area's history and pre-history, qualifying it as a cultural and/or historical landscape that will be impacted by the Project.

5. Land use & Planning

Projects that conflict with land use policies adopted for the purpose of avoiding or mitigating environmental effects typically trigger potentially significant impacts from the policy conflict. *League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal. App. 4th 896. The Project is subject to a number of state and local policies adopted for the purpose of avoiding or mitigating environmental effects that were not identified in the PEA. CPUC must undertake a detailed and searching review of all potentially applicable policies as part of the environmental review process. Some important applicable policies are listed below, although the list is not exclusive.

- a. The Project Does Not Conform to Various forms of Santa Barbara County Authority

Section 35-172.13.4 imposes "Additional Requirements" for Electrical Transmission Lines as follows:

a. Transmission line rights-of-way shall be routed to minimize impacts on the viewshed in the coastal zone, especially in scenic rural areas, and to avoid locations which are on or near habitat, recreational, or archaeological resources, whenever feasible. Scarring, grading, or other vegetative removal shall be repaired, and the affected areas re-vegetated with plants similar to those in the area to the extent safety and economic considerations allow.

b. In important scenic areas, where above-ground transmission line placement would unavoidably affect views, undergrounding shall be required where it is technically and economically feasible unless it can be shown that other alternatives are less environmentally damaging. When above-ground facilities are necessary, design and color of the support towers shall be compatible with the surroundings to the extent safety and economic considerations allow.

The Project does not conform to this policy, and this authority was omitted in the PEA.

The Santa Barbara County Local Coastal Plan also has relevant authority governing transmission lines that was omitted from the PEA. LCP Policy 4-7 requires undergrounding for certain projects and under certain conditions, and should be part of the environmental review process.

b. The Project does not conform to state authority

Finally, the California Coastal Act requires protection of scenic and visual qualities of the Santa Barbara County coastal zone

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

Public Resources Code § 30251.

6. Recreation

The Project will impact recreational activities, including increased risks for bicyclists on roadways. These include construction equipment and activities posing increased risks, and the location of wider poles adjacent to roadways and thereby narrowing the right of way and/or bike lanes and eliminating “escape routes” for bicyclists needing to avoid oncoming traffic or other

roadway hazards. The Project will impair views for hikers, diminish bird populations for birdwatchers, increase risks for hang gliders, and similarly impact all forms of recreational use of the lands affected by the Project.

7. Transportation and Traffic – construction

The Project will have significant impacts to transportation, circulation and traffic.

8. Public Safety – high fire hazard area

The Project is located in a designated Very High Fire Hazard Zone prone to foehn winds that can convert a spark or small blaze into a vicious inferno in a matter of minutes. Construction activities increase the likelihood of ignition, as does project operation. Birds and kites can spark wildfires in conjunction with the Project.

9. Cumulative Impacts

As noted *infra*, the Project is in a location where the applicant has undertaken numerous other projects, each of which has separate impacts. Combined with the Project, cumulative impacts are significant.

10. The need to mitigate for past impacts from the unpermitted construction

The environmental review document must identify and evaluate the effects of the applicant's past projects and the incremental adverse impacts these projects have had on the community. Had the applicant applied for permits and undergone an environmental review process, alternatives and mitigation measures to reduce the significance of those impacts would have been identified and likely incorporated into each such project. See for example, the PEA, where some mitigation measures are proposed. The EIR must undertake to isolate those temporal effects from the unpermitted development and strive to mitigate for those impacts in a compensatory fashion.

11. Alternatives

Finally, the EIR must undertake a robust assessment of potential alternatives. For the Shepard Mesa Area, the alternative identified in the PEA is a start, however Highway 150 is currently overburdened with a substantial amount of overhead congestion. The EIR should evaluate alternative routings down Goberndor Canyon, where ROW exists for a revised Project alignment that would avoid impacts to the Shepard Mesa area and not affect views from residential structures.

Mr. Lon Payne

May 22, 2013

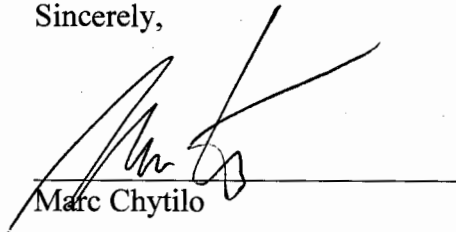
Page 10

Unquestionably, in light of applicable LCP policies and in the context of the history of this Project and related projects, the EIR must consider undergrounding of the Project in the most scenic and impacted areas, such as Shepard Mesa

Conclusion

We appreciate CPUC's involvement in this Project and the convening of a public Project Workshop and Scoping Hearing in Carpinteria. A number of individuals and community groups are concerned with the Project, and we implore CPUC to undertake a wide-ranging and robust environmental review process to ensure CEQA's goals are achieved and its requirements met to ensure the best decisionmaking and outcome for this important project.

Sincerely,



Marc Chytilo

CC: Clients
Supervisor Salud Carbajal

county of ventura

May 23, 2013

Lon Payne
California Public Utilities Commission
RE Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

E-mail: SBCRP.CEQA@ene.com

Subject: Comments on the NOP EIR or IS/MND for the Santa Barbara County Reliability Project

Dear Mr. Payne

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,


Tricia Maier, Manager
Planning Programs Section

Attachments

County RMA Reference Number 13-013



**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

Memorandum

TO: Laura Hocking, Planning DATE: May 20, 2013

FROM: Alicia Stratton

SUBJECT: Request for Review of Notice of Preparation for the Environmental Impact Report/ Mitigated Negative Declaration for the Santa Barbara & Ventura County Reliability Project (SBCRP), Southern California Edison, State of California Public Utilities Commission (Reference No. 13-013)

Air Pollution Control District staff has reviewed the subject environmental impact report/mitigated negative declaration, which addresses potential impacts from the project to rebuild and upgrade a portion of its transmissions infrastructure in Santa Barbara and Ventura Counties between the City of Ventura and the City of Carpinteria. This involves reconstruction of existing subtransmission facilities, installation of marker balls on overhead wire, modification of subtransmission and substation equipment, replacement of line protection relays within existing substation equipment rooms, installation of telecommunications facilities, installation of fault return conductor on subtransmission structures, and removal of subtransmission infrastructure foundations. The project location spans several segments; Segment 1 is from Santa Clara Substation in the east to the Casitas Substation in the west. Segment 2 spans from Casitas Substation in the east to the "Y" in the west. Segments 3 A and B span from to the Ventura County border and beyond. The remaining segments are in Santa Barbara County.

Air quality is identified as an area of potential adverse impact in Table 1 of the notice of preparation, *Potential Project Issues or Impacts*, found in Section C, *Scope of the EIR and Discussion of Potential Impacts*. This is due to construction possibly causing an exceedance of criteria pollutants above established thresholds. District staff recommends that the Draft EIR/MND evaluate all potential air quality impacts in Ventura County that may result from the project. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide and emissions particulate from all project-related motor vehicles and construction equipment. Any APCD permitting issues should be identified as well.

Although this is not a CEQA issue, this project may be subject to the requirements of the federal General Conformity regulation. Conformity is defined in the Clean Air Act as conformity to an air quality implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards, exacerbate

existing violations, or interfere with timely attainment or required interim emission reductions towards attainment. Section 176(c) of the Clean Air Act requires the EPA to develop criteria and procedures for determining the conformity of transportation and nontransportation (general) projects that require federal agency approval or funding with the applicable air quality plan. We recommend that the Draft EIR/MND includes a summary of the federal general conformity rule, which actions(s) related to the project may require a conformity analysis to be performed, and which agencies will likely be involved with the conformity determination(s).

If you have any questions, please call me at (805) 645-1426.



County of Ventura
Public Works Agency
Integrated Waste Management Division
MEMORANDUM

Date: May 16, 2013

To: Laura Hocking, Planner
Resource Management Agency, Planning Division

From: Derrick Wilson, Staff Services Manager
Integrated Waste Management Division

Subject: Notice of Preparation of EIR or an Initial Study & Mitigated Negative Declaration for Southern California Edison's *Santa Barbara County Reliability Project*. RMA Reference No: 13-013

Lead Agcy: California Public Utilities Commission
Contact: Lon Payne, 855/894-8054

Summary: Southern California Edison (SCE) has filed an application for a Permit to Construct (PTC) with the California Public Utilities Commission (CPUC) for the *Santa Barbara County Reliability Project*. The proposed project will rebuild and upgrade a portion of SCE's transmission infrastructure in Santa Barbara and Ventura Counties between the City of Ventura and the City of Carpinteria. In accordance with CEQA, the CPUC is the Lead Agency and will prepare an environmental review document to evaluate the proposed project's impacts on the environment. If necessary, the EIR will describe the nature and extent of the project's impacts along with all project alternatives, and will discuss mitigation measures for adverse impacts. Depending on the initial assessment of potential impacts related to the construction and/or operation of the project, the CPUC may instead issue an Initial Study and draft Mitigated Negated Declaration, if deemed appropriate.

Comments:

Pursuant to your request, the Integrated Waste Management Division (IWMD) has reviewed the project materials provided with your May 1, 2013, memo and appreciates this opportunity to provide our comments. As required by PRC 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Because the County currently exceeds the minimum

disposal capacity required by state PRC, the proposed project will have less than significant project-specific impacts, and will not make a cumulatively considerable contribution to significant cumulative impacts related to Ventura County's solid waste disposal capacity.

Due to proposed construction activities in Ventura County, the IWMD requests the Lead Agency to comply, to the extent feasible, with the general requirements of Ventura County Ordinances #4445 (solid waste handling, disposal, waste reduction, and waste diversion) and #4421 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to meet the requirements of Assembly Bill 939 (AB 939). AB 939 mandates all cities and counties in California to divert a minimum of 50% of their jurisdiction's solid waste from landfill disposal. Ordinances 4445 and 4421 may be reviewed in their entirety at www.wasteless.org/ord4445 and www.wasteless.org/ord4421.

Pursuant to IWMD review and responsibilities, the following contract specifications shall apply to this project:

Recyclable Construction Materials

Contract specifications for this project shall include a requirement that recyclable construction materials (e.g., concrete, asphalt, metal, rebar, wood) generated by the project, but not reused on site, be recycled at a permitted recycling facility. For a comprehensive list of permitted recyclers, haulers, and solid waste & recycling facilities in Ventura County, see: www.wasteless.org/construction&demolitionrecyclingresources.

Soil - Recycling & Reuse

Contract specifications for this project shall include a requirement that soil that is not reused on-site during the construction phase of the project be transported to a permitted facility for recycling or reuse. Illegal disposal and landfilling of soil is prohibited. For a comprehensive list of permitted recyclers, haulers, and solid waste & recycling facilities in Ventura County, see: www.wasteless.org/construction&demolitionrecyclingresources.

Green Materials - Recycling & Reuse

The Contract Specifications for this project shall include a requirement that wood waste and/or vegetation removed during the construction phase of this project be diverted from the landfill. This can be accomplished by on-site chipping and land-application at various project sites, or by transporting the materials to a permitted greenwaste facility in Ventura County. A complete list of permitted greenwaste facilities is located at: www.wasteless.org/greenwasterecyclingfacilities.

Report Quantifying Materials Diverted from Landfill Disposal by On-Site Reuse or Off-site Recycling

The contract specifications for this project shall include a requirement that all contractors working on the project submit a *Summary Table* to the IWMD at the conclusion of their work. The *Summary Table* must include the contractor's name, address, and phone number, the project's name, the types of recyclable materials generated during the project (e.g., metal, concrete, asphalt, rebar, wood, soil, greenwaste) and the *approximate* weight of recyclable materials:

- Reused on-site, and/or
- Transported to permitted facilities in for recycling and/or reuse.
- Please include the name, address, and phone number of the facilities where recyclable materials were transported for recycling or reuse in the *Summary Table*.

Receipts and/or documentation are required for each entry in the *Summary Table* to verify recycling and/or reuse occurred, and that recyclable greenwaste, wood, soil, and sediment generated by this project was not landfilled.

Should you have any questions regarding this memo, please contact Pandee Leachman at 805/658-4315.

Laura Hocking - Re: Environmental Document Review, RMA Ref. #13-013; comments due 5-21-13

From: Ewelina Mutkowska
To: Laura Hocking
Date: 05/21/2013 3:50 PM
Subject: Re: Environmental Document Review, RMA Ref. #13-013; comments due 5-21-13

Laura,

For the Santa Barbara County Reliability Project proposed by the Southern California Edison, the following is my comment:

Please note that any land disturbance activities within Ventura County (including County Unincorporated areas and within the city limits) are subject to Ventura Countywide Municipal Stormwater NPDES Permit Order No. R4-2010-0108, Part 4.F "Development Construction Program" requirements as applicable to the proposed project. The Part 4.F of the Permit requires implementation of the effective combination of erosion and sediment control Best Management Practices to prevent erosion and sediment loss, and the discharge of construction wastes based on the project scope criteria as defined by the Permit. The soil disturbance activities are defined by the Permit and include construction, demolition, clearing, grading, grubbing, or excavation or any other activity that results in a land disturbance. Additional information is provided in the NPDES Permit Order No. R4-210-0108 adopted by the Los Angeles Regional Water Quality Control Board in July 2010.

Will email submittal suffice?

Ewelina

Ewelina Mutkowska
Stormwater Program Manager
County of Ventura Public Works Agency
(805) 645-1382
Fax (805) 654-3350

ewelina.mutkowska@ventura.org

>>> Laura Hocking 05/01/2013 9:44 AM >>>

Please find attached a distribution memo and a notice for RMA Reference No. 13-013. A website address to view more information is mentioned in the Memo and the Notice.

Please contact me with any problems or questions regarding this transmission.

Laura Hocking, RMA Tech. III
Ventura County Planning Division
800 S. Victoria Avenue, Ventura, CA 93009
laura.hocking@ventura.org
(805) 654-2443



VENTURA COUNTY WATERSHED PROTECTION DISTRICT
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
Tom Wolfington, Permit Manager – (805) 654-2061

M E M O R A N D U M

DATE: May 20, 2013

TO: Laura Hocking, RMA/Planning Technician Planner
Resource Management Agency, Planning Division

FROM: Tom Wolfington, P.E. – Permit Section

SUBJECT: RMA 13-013 – Santa Barbara County Reliability Project Proposed by
Southern California Edison

Pursuant to your request, this office has reviewed the subject Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or Initial Study/ Mitigated Negative Declaration (IS/MND), prepared by Southern California Edison: California Public Utilities Commission- Energy Division.

SUBJECT LOCATION:

The project allows for the rebuilding and upgrading of a portion of the Southern California Edison transmission infrastructure in portions of Ventura and Santa Barbara Counties, between the City of Ventura and the City of Carpinteria.

PROJECT DESCRIPTION

The purpose of the proposed project is to rebuild and upgrade a portion of the Southern California Edison transmission infrastructure within northwestern Ventura County and southeastern Santa Barbara Counties between the Cities of Ventura and Carpinteria. The project would increase service reliability particularly during emergency conditions by modernizing and reinforcing the existing 66 kilovolt subtransmission system. Within Ventura County specifically, proposed components would include the following:

- Reconstruction of the existing 66 kV subtransmission facilities within existing utility rights-of-way between the Santa Clara Substation and the existing Carpinteria Substation.
- Installation of marker balls on overhead wire.
- Modification of subtransmission and substation equipment within the existing Casitas and Santa Clara Substations.
- Installation of fiber optic telecommunication equipment at the Casitas, Santa Clara and Ventura Substations.

May 20, 2013

RMA 13-013 – Santa Barbara County Reliability Project Proposed by Southern California Edison

Page 2 of 2

Project construction is anticipated to begin in July 2014 and would take approximately two years.

WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:

There are several Watershed Protection District (District) jurisdictional redline channels and facilities located in the project study area including, but not limited to Harmony Creek, Lake Canyon, Sexton Creek, East Fork Hall Canyon, Manuel Canyon, Canada Largo and facility, Weldon Creek and facility, Ventura River, Coyote Canyon, Casitas Creek, Rincon Creek, and West Fork Coyote Creek. The District undertakes ongoing operational monitoring and maintenance activities along these channels and facilities.

The project is proposing maintenance and upgrades to existing SCE infrastructure such as repairs, pole brushing, herbicide applications, tree trimming, replacing defective circuit boards, damaged radio antennas and feedlines, and equipment testing such as filter change outs and software/ hardware upgrades.

District staff would like for the Environmental Assessment document to include an exhibit that identifies the location of all proposed infrastructure reconstructions, upgrades, and new facilities and transmission alignments in relation to the District's jurisdictional redline channels and facilities. Maps of the District's channels and facilities are available upon request.

If it is determined through the Environmental Assessment process that impacts to District channels and facilities are unavoidable, the Environmental Assessment document should include a discussion stating that in accordance with District Ordinance WP-1 enacted January 10, 2010, no person shall impair, divert, impede or alter the characteristics of the flow of water running in a redline channel without first obtaining a written permit from the District. Further, any activity in, on, under or across any jurisdictional red line channel, including the channel bed and banks, will require a permit from the District. If there are any new towers or other ground facilities proposed, they should be clear of District property, clear of the Regulatory Floodway as delineated on the effective Federal Emergency Management Agency's (FEMA) Digital Flood Insurance Rate Maps (DFIRMs), as well as clear of the bed and banks of the redline channels. Also, new towers and other ground facilities should be set back far enough to minimize erosion hazard potential. Your cooperation with local efforts is appreciated.

END OF TEXT

County Of Santa Barbara



Chandra L. Wallar
County Executive Officer

105 East Anapamu Street, Room 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

May 21, 2013

Mr. Lon Payne
California Public Utilities Commission
RE: Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Email: SBCRP.CEQA@ene.com

Re: Santa Barbara County Reliability Project proposed by Southern California Edison

Dear Mr. Payne:

Thank you for the opportunity to comment on the Notice of Preparation for the Santa Barbara County Reliability Project proposed by Southern California Edison. At this time, the County submits comments from the Planning and Development Department.

The County looks forward to continued dialogue on the Santa Barbara County Reliability Project. If you have any questions, please do not hesitate to contact my office directly or Glenn Russell, Director, Planning and Development Department, at (805) 568-2085.

Sincerely,



Chandra L. Wallar
County Executive Officer

Cc: Glenn Russell, Director, Planning and Development Department

Encl: County response letter, May 21, 2013



County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director

Dianne Black, Assistant Director

May 21, 2013

Lon Payne
California Public Utilities Commission
RE: Santa Barbara County Reliability Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Email: SBCRP.CEQA@ene.com

RE: Santa Barbara County Reliability Project proposed by Southern California Edison

Dear Mr. Payne:

Thank you for the opportunity to comment on the Santa Barbara County Reliability Project proposed by Southern California Edison. The County submits the following comments from Planning & Development Department (P&D) for your consideration in preparing an environmental review document to evaluate the proposed project.

1. Pursuant to the County of Santa Barbara's certified Local Coastal Program, the California Coastal Commission has granted to the County the authority to approve and issue Coastal Development Permits for those portions of the project that are located within the County's Coastal Zone. As a Responsible Agency, the County respectfully requests the CPUC's consideration of our comments and recommendations for the completion of an environmental document that will be adequate for County decision-makers to review and decide upon the required Coastal Development Permits. In addition to the more specific comments below, the County requests that you include in your analysis an assessment of impacts for the Santa Barbara County portion of the project in accordance with the County's *Environmental Thresholds and Guidelines Manual*, available on P&D's website, www.sbcountyplanning.org and the Santa Barbara County Air Pollution Control District's *Scope and Content of Air Quality Sections in Environmental Documents* available at www.sbcapcd.org/apcd/landuse.htm. P&D planner Julie Harris (jharris@countyofsb.org) would be happy to assist you with questions that may arise.
2. Type of Environmental Document. The County recommends the preparation of an Environmental Impact Report (EIR) regardless of the outcome (i.e., even if all identified impacts can be mitigated to less than significant levels). Given the scope of the project and the controversy within Santa Barbara County, particularly in regards to the unpermitted construction, an EIR would provide the greatest opportunity to thoroughly assess environmental impacts and mitigation measures, as well as provide a robust analysis of project alternatives.

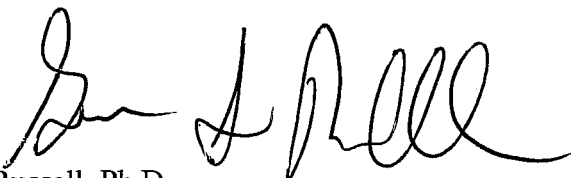
3. Alternatives to the Proposed Project. The County recommends that alternatives be analyzed including undergrounding of all or portions of the project, as well as considering alternative alignments.
4. Baseline. Although CEQA typically directs the baseline for assessment of environmental impacts to be the environmental conditions existing at the time of the Notice of Preparation, flexibility can be considered under unique circumstances. In this instance, a portion of the project (Segment 3A) was constructed without permits from the CPUC or from the County of Santa Barbara. The unpermitted construction was originally brought to the County's attention and ultimately determined to be a violation of the County's Coastal Zoning Ordinance. The unpermitted construction resulted in the enlargement of structures (5-10 feet taller) as well as an aesthetic change due to the replacement of wood poles with light weight steel. At a minimum, the County believes that the baseline for the assessment of impacts to aesthetics/visual resources for Segment 3A is the pre-construction condition.
5. Potential Project Issues or Impacts Identified by the CPUC.
 - a. Aesthetics. As mentioned above, the County believes you can rely upon the pre-construction condition of Segment 3A for the assessment of impacts to visual resources given the material change of the poles from wood to steel. Depending on the level of impact identified, mitigation measures that should be considered include replacing the gray light weight steel poles with wood (thus, returning the project to its pre-construction aesthetic condition), replacing the light weight steel poles with a brown colored steel, and consideration of brown vs. gray steel for Segment 4, especially depending upon the predominant viewshed (whether poles would be viewed against the backdrop of the Santa Ynez Mountains or along a ridge against the sky). P&D staff has observed the use of a dark brown steel by other utilities (e.g., by San Diego Gas & Electric in San Diego County and in Arizona and New Mexico in April 2013) for both light weight steel and engineered steel poles. P&D staff has observed the incorporation of brown steel poles into transmission and distribution lines that predominantly use wood for the support structures. Finally, a brown matte paint could be considered as mitigation for Segment 3A but only if it would not result in other aesthetic issues (e.g., chipping paint or maintenance problems).

In addition, the analysis should consider 1) the potential for aesthetic impacts to users of the Franklin Trail, which may be constructed and open to the public prior to commencement of the SBCRP and 2) aesthetic impacts of grading and retaining walls.
 - b. Agricultural Resources and Biological Resources. The project includes grading to reestablish access to various locations where towers will be removed and new poles constructed, as well as the completion of work in the Shepard Mesa area. New access road work will occur on both agricultural lands and national forest lands. Please address the potential for spreading pests (including insects, diseases and plants considered noxious according to Section 4500 of the California Code of Regulations or considered invasive by the California Invasive Plant Council (Cal-IPC)) to agricultural and natural areas (i.e. National Forest). The Santa Barbara County Agricultural Commissioner's Office has an entomologist, plant pathologist and weed management specialist on staff and would be happy to assist you with any questions.

- c. Air Quality. Please include an analysis of greenhouse gas related impacts.
 - d. Biological Resources. Please include an analysis of potential impacts to terrestrial native habitats and survey for sensitive plant species including Nuttall's scrub oak (*Quercus dumosa*), Santa Barbara Honeysuckle (*Lonicera subspicata* var. *subspicata*), and any other sensitive species identified by the California Natural Diversity Database (CNDDDB) as potentially occurring within the project area. In addition, please identify whether any native trees (e.g. Coast live oak, California sycamore, and California black walnut) would be impacted by the project.
6. Additional Issue Areas for Consideration.
- a. Geology. If grading for access roads will cumulatively be greater than 50 cubic yards include an analysis as to how geological resources may be impacted.
 - b. Recreation. A major segment of the new Franklin Trail has recently gained approval by the County of Santa Barbara and the City of Carpinteria. Construction of the trail should begin in the near future. The alignment of this new trail will be near that portion of Segment 4 as it approaches the Carpinteria Substation, and in some locations, may coincide with the access road. The environmental document should analyze any potential impacts if the trail would be constructed and open to the public before construction begins on Segment 4.
7. In August 2012, Planning & Development reviewed an early draft of the Proponent's Environmental Assessment (PEA), prepared by Southern California Edison and subsequently submitted to the CPUC as a part of its application package. P&D prepared comments on the PEA and delivered these to the applicant and to CPUC staff. Although these comments were specifically addressed to Southern California Edison, they included comments and suggestions that, if incorporated into the environmental document, would clarify the project description, thresholds of significance, environmental impacts, and mitigation within Santa Barbara County. Please consider these comments (attached and edited) during environmental document preparation.

Thank you for providing us with the opportunity to review and provide a response.

Sincerely,



Glenn S. Russell, Ph.D.
Director

Enclosure: Attachment A - Comments on SCE Administrative Draft Proponent's Environmental Assessment

ATTACHMENT A

Comments on SCE Administrative Draft Proponent's Environmental Assessment August 22, 2012, edited May 16, 2013

General comments

1. Wherever relevant, provide a discussion of the project's specific impacts within SB County, and include the identification and use of the thresholds found in the County's *Environmental Thresholds and Guidelines Manual*. There may be circumstances when an impact is significant in SB County but not Ventura County when these thresholds are utilized.
2. Regarding mitigation measures in general. In Santa Barbara County, mitigation measures include plan requirements (if a measure must be included on plans, either printed or graphically depicted) and timing (when the measure is required), as well as monitoring.

Alternatives and Project Description

3. Page 2-1 and 2-4. Undergrounding is mentioned only for sections not yet constructed. P&D strongly recommends it be discussed for the already constructed but not yet permitted segment in SB County below Shepard Mesa. Neighbors' comments already request undergrounding of this segment. Any such discussion should mention the status of existing easements for overhead electric transmission facilities and indicate whether these easements allow for undergrounding or if the easements would need renegotiation with the underlying landowners.
4. Page 2-3 last paragraph and Hwy 192 as alternative route. The paragraph does not substantiate the conclusion to dismiss this alternative from further analysis. Either an alternative must be analyzed, or at a minimum more information must be provided to substantiate a conclusion to dismiss it from further review.
5. Figure 3.0-1b5. Figures should distinguish between Segment 3A, Segment 4 and the 220kV line. Clarification would be useful that x feet west of the span across Gobernador Creek, the two rows of towers split, one heading more west-southwest and the other heading northwest.
6. Page 3-18 and 3-23. Provide statistics for Segment 4 that occur a) in Santa Barbara County and b) within the Coastal Zone of SB County. Whenever Segment 4 is discussed there should be a part of the discussion that specifically references the impacts within SB County.
7. Page 3-20. Currently, our information for Segment 4 indicates there are several spur roads in the Coastal Zone (four if I recall correctly) that will need new grading to re-establish access to the locations of existing LSTs to be replaced. Grading must be included in the project description and include an estimate of grading quantities specific to SB County/Coastal.
8. Page 3-20 last sentence. If LWS diameter is typically the same diameter as wood poles it should be stated.
9. Page 3-31. Will there be a staging area in SB County to construct Segment 4? If not, which staging yard will be used?

Aesthetics

10. Page 4-11 Photo #2 also provide a good view of Segment 4 as it steps down the hill into the substation; a good photo to use/add for simulation with the TSP.
11. Photo 15 is also a good candidate for visual simulation. I thought we would see simulations for all KOPs we identified in SB on our visual site visit.
12. Page 4-35. County asks the CEQA questions a little differently. Components of County's initial study checklist could be incorporated into the questions and analysis to provide a better document for the County's use. The specific language the County uses is as follows (items b and c appear to have already been adequately included):
 - "Will the proposal result in:
 - a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?
 - b. Change to the visual character of an area?
 - c. Glare or night lighting which may affect adjoining areas?
 - d. Visually incompatible structures?"For example the analysis focuses on "scenic vista" while SB County looks at the visual area more broadly, as reflected in a. above.
13. Page 4-37. The analysis concludes that gray steel against the sky and lighter-colored landscape backdrops appear less prominent. But darker landscape backdrops not mentioned, where the gray color is more prominent than wood. This is especially true for Shepard Mesa residents who look down on the project. Shepard Mesa is also the area where the majority of new poles were taller. What about brown LWS poles? They are manufactured and would be a better option for the Shepard Mesa traverse.
14. Pages 4-41 to 4-44. Will the poles really blend in as much as the towers, which is what the simulations depict? Earlier versions submitted showed a noticeable difference. The new poles are taller, thicker, and "beefy" compared to the towers, which have thinner structural components that one can see through to the landscape beyond. The conductor is also going to be thicker.
15. Aesthetics in general-construction. Chapter 3 describes the construction of retaining walls in the event that grades around a new foundation need to be stabilized, and provides some alarming (from an aesthetic viewpoint) photographic examples, which if required, could result in an aesthetic impact needing mitigation. If retaining walls were to be required on a scale as provided in the project description photos, what is the mitigation for these aesthetic impacts? This is an example of where I would like to see more specific analysis for the SB County portion of the project. With a more specific analysis you can conclude:
 - a. no retaining walls needed (i.e., no impact),
 - b. small scale retaining walls needed that would have a less than significant impact, or

- c. large scale retaining walls needed that would cause an aesthetic impact requiring mitigation.

Agriculture

16. Page 5-53. The ranking you discuss does not adequately portray the highly productive agricultural resources of the Carpinteria Valley. According to definitions in the Land Use Element (similar definitions are in the Coastal Land Use Plan except for AC), the AC (Agricultural Commercial) designation applies to all commercially farmed land that is subject to a Williamson Act contract in the Inland Area. A-II applies to agricultural lands in the Rural Area. A-I is applied to prime and non-prime lands in the Urban Area, and to Inner Rural and Rural areas that are near urban centers. It should be noted that most of the farmlands in the Carpinteria Valley are highly productive and most are designated A-I, especially those on the valley floor. The AC designation does not exist in the Coastal Zone but many of the lands in the Carpinteria Valley are designated A-I, are under Williamson Act contracts, and are highly, not marginally, productive.

Air Quality

17. Page 4-79. States that SB APCD recommends construction emissions be offset. However, the adopted County Environmental Thresholds Manual for Air Quality states: "Santa Barbara County violates the state standard for PM₁₀. Therefore, dust mitigation measures are required for all discretionary construction activities." This project is a discretionary project. The SB APCD does in fact require dust control mitigation measures on all projects that include any significant quantities of grading. Discussion should be updated accordingly and carried forward to all other part of the document where air quality impacts are discussed (including Segment 3A).
18. Compare Ventura APCD mitigation measures with SB APCD. Add in any missing SB APCD measures at least for the project components that will take place in SB and note it in the mitigation measures. If the measures are required, use "shall" instead of "should".

Biological Resources

19. Page 4-95. Near bottom of page it states that Segments 3A and 4 span and cross Carpinteria Creek. This statement is correct for Segment 3A. It is incorrect for Segment 4. Two forks of Carpinteria Creek come together just north of Casitas Pass Road. The west fork is Carpinteria Creek according to the USGS quad. The east fork is named Gobernador Creek. According to your project plans, Segment 4 crosses Gobernador Creek (in the Coastal Zone); this is correct. Segment 4 does not cross Carpinteria Creek until much further upstream, just after Sutton Creek diverges west (in the Inland Area). Segment 4 then crosses Sutton Creek. An alternative description could be to state Segment 4 crosses Carpinteria Creek and several of its tributaries. You are correct these creeks are only designated ESHAs in the Coastal Zone.

20. Figure 4.4-2. According to information on file at P&D, both the west fork of Carpinteria Creek and the east fork (Gobernador Creek) are identified critical habitat for steelhead.
21. Page 4-114. Top of page. All of Segment 3A and portions of Segment 4 are within the Coastal Zone.
22. Page 4-117 and 4-125. Are there any deciduous oaks in the project area? The referenced ordinance is intended to protect valley oaks (*Quercus lobata*) and blue oaks (*Quercus douglasii*). Typically, these species do not occur on the south side of the Santa Ynez range. If none found may delete this reference.
23. Page 4-122 last paragraph. County requires restoration of riparian habitats impacted by construction activities, especially within the Coastal Zone as they are designated ESHAs. Either modify BIO-2 to require restoration plan for riparian habitat or add a new riparian habitat restoration plan mitigation.
24. Page 4-123 first paragraph. Trimming or pruning of native trees, especially sensitive native trees should be conducted by a certified arborist. Should add a new mitigation to have certified arborist prepare a tree protection plan that best addresses protection and maintenance/pruning measures.
25. Page 4-126. Oak tree trimming and removal. For trimming see comment above. For every oak tree removed and for oak trees that would be impacted planting of new oaks is required in SB County. An impact is usually determined by an arborist and based on greater than 20% of an oak's critical root zone (corresponding to overhead canopy) being impacted by grading/construction activities. In habitat areas, the typical replacement ratio is 10:1 (10 planted for every one removed or impacted) one-gallon size derived from local seed stock. Should add mitigation or incorporate with measure to address comment above.
26. Bio Resource Mitigation Measures. Overall inadequate. These mitigations "shall" occur, not should, would or may.
 - a. Bio 1, 4, 5 and 6 defer mitigation if the circumstance arises whereby avoidance cannot be achieved by stating SCE will consult with the appropriate agency. Do not defer. For mitigation to be adequate explain what you will do to mitigate if avoidance cannot be achieved. For example, regarding BIO-4, pre-construction nesting bird survey mitigation measure. In the event an active nest is found in a pole or tree that must be removed, the mitigation should be to stop work and redirect it elsewhere until the juveniles have fledged and the nest is abandoned. County typically uses standard buffers of 500 feet from an active raptor nest and 300 feet for other bird species' active nests. Please include appropriate buffers and state them in your mitigation.
 - b. Is flagging adequate to protect a sensitive plant resource? Will crews really notice it? County requires temporary fencing and does take into account site specific resources and issues to make sure the fencing doesn't cause its own impacts.

Cultural Resources

27. Page 4-144. Please also reference County Coastal Land Use Plan arch/historic policies. They are similar, if not the same (policies 10-1 through 10-5).
28. Pages 4-139-140 and 4-147. Regarding the newly identified SBCRP sites 1-3 along Segment 4. It is not clear if these sites are in SB or Ventura. It's also not clear that evidence presented supports your conclusion that 1 and 2 are not historic resources pursuant to the criteria you reference.
29. Page 4-147 last paragraph. May be helpful to state in this paragraph the reason that you found no impacts to the two known sites in SB.
30. Page 4-155 APM CUL-01. You should clearly reference the plan in Chapter 3 since it provides all of the details of the tasks you would follow to mitigate potential impacts to cultural resources. Under similar circumstances P&D would likely use two of our standard mitigation measures that would require a cultural resources monitor (archaeologist and Native American) be present for all ground disturbances near known resources and our standard stop work and investigate when a resource is discovered.

Geology and Soils

31. Page 4-172 third paragraph. Is regular maintenance of access roads part of project description?
32. Page 4-174 APM GEO-1. The mitigation should begin with the statement that SCE shall conduct additional detailed, site specific geotechnical analyses. Is there enough language in this measure as drafted to ensure that geologic impacts would be mitigated to less than significant?

Hazards and Haz Mat

33. Page 4-184. Although California Department of Forestry and Fire Protection (CALFIRE) maps of fire hazard severity zones have not yet been adopted by SB County, SB County Fire has a mapped High Fire Hazard Area, adopted by Ordinance. According to this map, all land in Carpinteria north of State Route 192 and 150 (i.e., Foothill Road/Casitas Pass Road) is located within a High Fire Hazard Area. The boundary more or less follows the centerline of the road. Thus, all of Segment 4 is within this area. Segment 3A below Shepard Mesa is within this area. Segment 3A where it follows the road would be in this area where the subtransmission line is on the north side of the roadway.
34. Figure 4.8-1 should reference this as CALFIRE's hazard severity zones. If you would like to add County Fire's to the map please contact P&D staff and we will assist you in providing the necessary information for your map.

Hydrology and Water Quality

35. Page 4-215 Significance criteria. Any discretionary project undergoing environmental review must analyze water quality according to the adopted thresholds of significance under the Surface and Storm Water Quality Significance Guidelines of the Thresholds Manual. At a minimum,

describe/quantify the portions of Segment 4 within the County (both volume of grading and areal extent) and then determine whether the project exceeds one or more of the thresholds. If so, mitigation is typically construction site BMPs.

36. Page 4-216. Are any Federal or State permits required within SB County? My understanding of the project within SB County is that there will be no disturbance to the creeks; rather only conductor will span the creeks high in the air with no physical disturbance to bed and bank.

Land Use

37. Figures 4.10-4b and 4.10-5b. RES-100 zoning is Resource Management not Open Lands.
38. Page 4-243 last paragraph. Segment 3A, which is entirely in the Coastal Zone, does not cross lands designated AC as that designation has not been certified in the Coastal Zone.

Noise

39. Page 4-274. Add County noise thresholds, analyze the impacts and apply the mitigation included in the Thresholds Manual. If there are no residences located within 1,600 feet of any construction sites then state the fact and there would be no significant impact. However, it is likely that there are some residences within 1,600 feet of some of the construction sites.
40. Page 4-283 first paragraph and 4-284 second paragraph. P&D does not process variances from construction hour limits. The limit is applied as mitigation or permit condition – the limit is not an ordinance requirement that can be granted a Variance. The limits apply to noise generating construction, if a particular activity is not noisy, it may occur outside the limitations.
41. Page 4-293. NOISE-1. Draft separate measures for each jurisdiction and include the specific requirement for each jurisdiction. As noted for mitigation measures in general, provide plan requirements, timing and monitoring requirements.
42. Remaining measures are weak – see general mitigation comments.

Transportation and Traffic

43. Page 4-330 and Figure 4.16-2a Mass Transit. The Santa Barbara Metropolitan Transit District (MTD) operates a route from Santa Barbara to Carpinteria (Route 20). According to the map on MTD's website, Route 36 (Seaside Shuttle) does not operate along any portion of Segment 3A.
44. Pages 4-342-347 Segment 3A impact analysis. In other sections of the document (and in project description) you describe the additional work necessary to complete construction of Segment 3A and analyze the impacts in doing so. The same concept should be included in the traffic analysis.
45. Page 4-341 and 4-350. Please reference SB County's traffic thresholds of significance (located in the Environmental Thresholds and Guidelines Manual) and analyze the potential impacts of the project. You may need more traffic information for the roadways in SB County than "operate at an LOS D or better."