Volume 2: Appendices

SOUTHERN CALIFORNIA EDISON'S MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

CPUC A.13-10-021
SCH NO. 2014031073

Final Environmental Impact Report
(Response to Comments)

Prepared for
California Public Utilities Commission

October 2015

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October 2015

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APPENDIX A
Notice of Availability

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STATE OF CALIFORNIA **EDMUND G. BROWN, Governor**

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

To: **State Clearinghouse, Responsible and Trustee Agencies, Property Owners & Interested Parties**

From: **Michael Rosauer, Environmental Project Manager**

Subject: **NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR) AND PUBLIC MEETING: Moorpark-Newbury 66 kV Subtransmission Line Project (A.13-10-021) SCH No. 2014031073**

Date: **June 11, 2015**

The California Public Utilities Commission (CPUC) has prepared a Draft Environmental Impact Report (Draft EIR) under the California Environmental Quality Act (CEQA) for consideration of the application filed by Southern California Edison (SCE) to construct, operate, and maintain the Moorpark-Newbury 66 kV Subtransmission Line Project (A.13-10-021, Proposed Project). The Draft EIR describes the Proposed Project; evaluates and describes the potential environmental impacts associated with the Proposed Project's construction, operation, and maintenance; identifies those impacts that could be significant; and presents mitigation measures which, if adopted by the CPUC or other responsible agencies, could avoid or minimize these impacts. The Draft EIR also considers alternatives to the Proposed Project, including two No Project Alternatives.

Description of the Proposed Project
The Proposed Project is located within approximately 9 miles of existing SCE rights-of-way (ROW) between SCE's Moorpark and Newbury substations, in the cities of Moorpark and Thousand Oaks, and in unincorporated Ventura County. SCE requests authorization to:

- Install approximately 500 feet of new underground 66 kV subtransmission line and a new line position in the 66 kilovolt (kV) switchrack entirely within Moorpark Substation.
- Install two tubular steel pole (TSP) foundations, four TSPs, the upper portion of one TSP, and approximately 5 miles of conductor on new and existing TSPs along the new Moorpark-Newbury 66 kV Subtransmission Line route on the south and east sides of SCE's existing Moorpark-Ormond Beach 220 kV ROW.
- Install eight TSP foundations, 13 double-circuit TSPs, and approximately 3 miles of conductor on the new Moorpark-Newbury 66 kV Subtransmission Line, and reconductor 3 miles of the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line. Both of these subtransmission lines would be collocated on the new double-circuit TSPs. In addition, 14 existing lattice steel towers (LSTs) would be removed along this 3-mile segment.
- Install approximately 0.5 mile of conductor for the new Moorpark-Newbury 66 kV Subtransmission Line to be collocated with the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line on previously installed lightweight steel (LWS) poles into Newbury Substation. In addition, four TSP foundations, four TSPs, two LWS poles, and a new 66 kV subtransmission line position would be installed, and six wood poles would be removed at Newbury Substation. The existing subtransmission, distribution, and telecommunications facilities would be transferred onto the new TSPs and LWS poles.

The objectives of the Proposed Project are to add capacity to meet forecasted electrical demand while providing long-term, safe, and reliable electrical service in the electrical needs area, as well as to maintain sufficient voltage in accordance with applicable requirements during normal and abnormal system conditions.

Public Comment on the Draft EIR
The Draft EIR is available for review and comment during a 45-day public comment period (June 11, 2015 through July 27, 2015). The public may present comments and concerns regarding the Proposed Project and the adequacy of the Draft EIR. Written comments on the Draft EIR must be postmarked or received by e-mail no later than July 27, 2015. Please be sure to include your name, address, and telephone number in your correspondence.

Written comments on the Draft EIR should be sent to:

Mr. Michael Rosauer
Moorpark-Newbury Project
c/o Environmental Science Associates
1425 N. McDowell Blvd, Ste 200
Petaluma, CA 94954
Phone: (707) 795-0926
Moorpark-Newbury@esassoc.com

The CPUC will also hold a public comment meeting to receive oral and written comments from interested parties. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the Proposed Project. The public meeting will be held:

Wednesday, June 24, 2015
6:00 p.m. to 8:00 p.m.
Palm Garden Hotel
495 Ventu Park Road
Thousand Oaks, CA 93120

Availability of Draft EIR
Copies of the Draft EIR will be available for public review at the Grant R. Brimhall Library, Moorpark City Library, Newbury Park Branch Library, and on the Proposed Project website at:

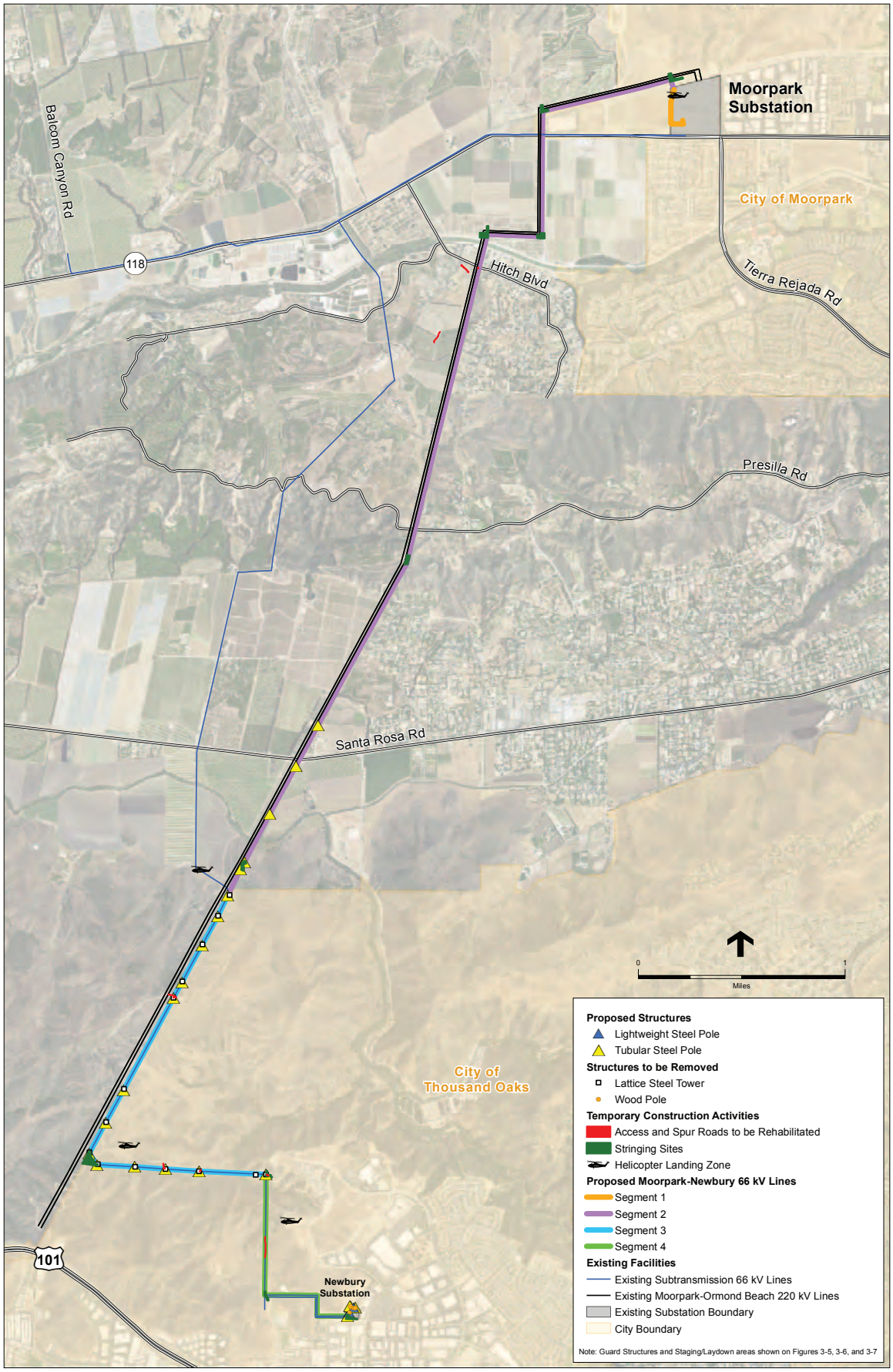
http://www.cpuc.ca.gov/Environment/info/esa/moorpark_newbury/index.html

This website will be used to post all public documents during the environmental review process and to announce any upcoming public meetings. CD copies of the Draft EIR may be requested by telephone at (707) 795-0926 or by e-mail at Moorpark-Newbury@esassoc.com.

Proposed Project information repositories include the following branches:

Grant R. Brimhall Library 1401 East Janss Road Thousand Oaks, CA 91362 Phone: (805) 449-2660	Moorpark City Library 699 Moorpark Avenue Moorpark, CA 93021 Phone: (805) 517-6370	Newbury Park Library 2331 Borchard Road Newbury Park, CA 91320 Phone: (805) 498-2139

REMINDER: Draft EIR comments will be accepted by e-mail or mail with postmark through July 27, 2015. Please be sure to include your name, address, and telephone number.



SOURCE: SCE, 2013/2014

Moorpark-Newbury 66 kV Subtransmission Line Project. 207584.15

Figure 1
Proposed Project Area

APPENDIX B
Draft EIR Newspaper Legal Advertisements

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Certificate of Publication

Ad #562320

In Matter of Publication of:

Public Notice

State of California)
))§
County of Ventura)

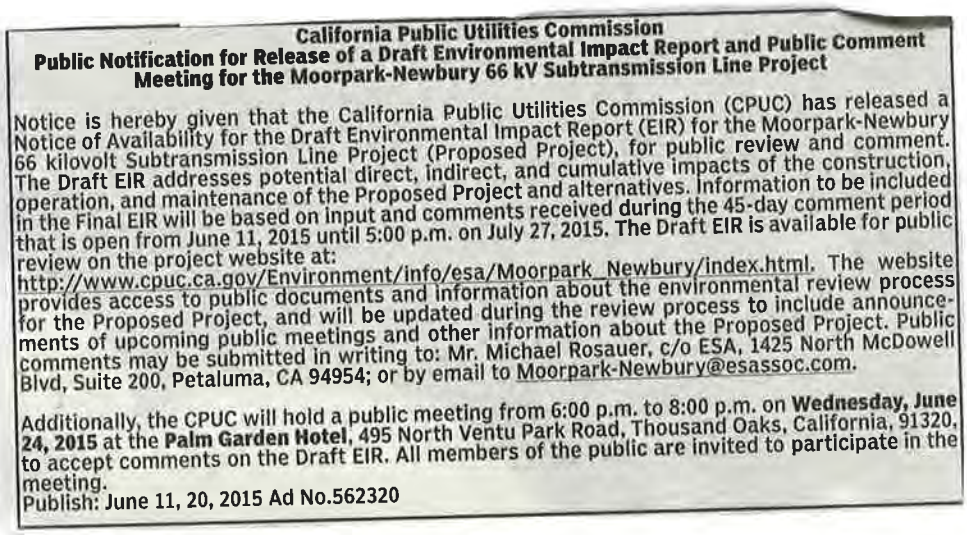
I, **Maria Rodriguez**, hereby certify that the **Ventura County Star Newspaper** has been adjudged a newspaper of general circulation by the Superior Court of California, County of Ventura within the provisions of the Government Code of the State of California, printed in the City of Camarillo, for circulation in the County of Ventura, State of California; that I am a clerk of the printer of said paper; that the annexed clipping is a true printed copy and publishing in said newspaper on the following dates to wit:

June 11, 20, 2015

I, Maria Rodriguez certify under penalty of perjury, that the foregoing is true and correct.

Dated this June 22, 2015; in Camarillo, California, County of Ventura.

Maria Rodriguez
(Signature)



California Public Utilities Commission
Public Notification for Release of a Draft Environmental Impact Report and Public Comment Meeting for the Moorpark-Newbury 66 kV Subtransmission Line Project

Notice is hereby given that the California Public Utilities Commission (CPUC) has released a Notice of Availability for the Draft Environmental Impact Report (EIR) for the Moorpark-Newbury 66 kilovolt Subtransmission Line Project (Proposed Project), for public review and comment. The Draft EIR addresses potential direct, indirect, and cumulative impacts of the construction, operation, and maintenance of the Proposed Project and alternatives. Information to be included in the Final EIR will be based on input and comments received during the 45-day comment period that is open from June 11, 2015 until 5:00 p.m. on July 27, 2015. The Draft EIR is available for public review on the project website at:
http://www.cpuc.ca.gov/Environment/info/esa/Moorpark_Newbury/index.html. The website provides access to public documents and information about the environmental review process for the Proposed Project, and will be updated during the review process to include announcements of upcoming public meetings and other information about the Proposed Project. Public comments may be submitted in writing to: Mr. Michael Rosauer, c/o ESA, 1425 North McDowell Blvd, Suite 200, Petaluma, CA 94954; or by email to Moorpark-Newbury@esassoc.com.

Additionally, the CPUC will hold a public meeting from 6:00 p.m. to 8:00 p.m. on **Wednesday, June 24, 2015** at the **Palm Garden Hotel**, 495 North Ventu Park Road, Thousand Oaks, California, 91320, to accept comments on the Draft EIR. All members of the public are invited to participate in the meeting.
Publish: June 11, 20, 2015 Ad No.562320

APPENDIX C

Public Meeting Sign-in Sheets and Speaker Cards

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Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
Alan Ludington		10300 Presilla Rd.	Alan@Ludingtonfamily Trust.com
Trevor Ludington		10300 Presilla Rd	
CATHRYN ANDRESEN		9715 SANTA ROSA RD	barn93012@yahoo.com
THIAGA IYER	RESIDENT & Parent + work in this Area	3902 Arenda Verano T.O CA	thiagaiyer@yahoo.com
Molly Pei	Resident	10530 Presilla Rd	mkpei@me.com
Penelope Burley	Res.	12328 San Sebastian Ct SRV, CA 93012	
Damon Wing	Ventura County Board of Supervisors Linda Parks' ofc.	625 N. Hillcrest Dr. Thousand Oaks	damon.wing@ventura.org
HOWARD CHOY	LA COUNTY / SoCAL REN	1100 N. Eastern Ave. L.A. 90063	HCHOY@ISD.LACOUNTY.GOV

Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
Jill Lederer	Greater Conejo Valley Chamber of Commerce	600 Hampshire Rd. #200 Thousand Oaks, CA 91361	jlederer@conejochamber.org
Douglas G. O'Brien	The Energy Coalition	7303 Wallaby Str Ventura	dobrien@energycoalition.org
JAMES T. FORTNEY	RESIDENT	P.O. Box 3419 CAMARILLO, CA 93011-3419	
Morgan Culbertson	Office of Assemblymember Jacqui Irwin	Newbury Park	morgan.culbertson@asm.ca.gov
WES SHIPWAY	Resident SRV	10486 Summer View Cir. Santa Rosa Valley, CA 93012-9319	wesship@aol.com
PATTICIA Becker	resident SRV	2999 Yucca Dr Santa Rosa Valley 93012	Patriciabecker@sbcglobal.net
Kelly Hall	Resident SRV	2669 Buggy Ln Santa Rosa Valley 93012	Kellyrshall@gmail.com

Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
Clay Eichenseer		625 Overlook Rd	clayike06@yahoo.com
Chris Peck	SCE		
Rosalie Barcinas	SCE		
Becca Whitnall	Acorn Newspaper		becca@theacorn.com
Peggy Ludington	Santa Rosa Homeowner	10300 E Presilla Rd Santa Rosa Valley 93012	peggylud@aol.com
Linda Cannon	Santa Rosa Valley homeowner	11621 Presilla Rd SRV 93012	haciendalindas@gmail.com
DOUG PRICE	SRV HOMEOWNER	10589 SANTA ROSA RD SRV 93012	MAIL @ JDOUGLASPRICE.COM
Dusty Russell	State Senator Fran Pavley	5016 N. Parkway Calabasas suite 202 Calabasas, CA 91302	dusty.russell@sen.ca.gov

Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
Barry Becker	Home Owner	2999 Yucca Drive SRV 93012	Barry@pacificwestbuilders.com
Gary Arbogast Susan Arbogast	Homeowners	2866 Los Fresnos, SRV 93012	soozngar@verizon.net
Bill Brandt Nina Brandt	Homeowners	10767 Citrona Dr. 93012	PROJDUDE@AOL.com
Ken Gordon Linda Gordon	Homeowners	2650 Buggy Lane SRV, 93012	visionall@aol.com
Terry Milligan John Milligan	homeowner	3321 Chestnut Lane Camarillo CA 93012	
cherylemPotter Herb Potter	home Owners	10567 Ternez Dr. Mpk, CA 93021	Pottercm@me.com
Barry Johnson	Home Owner	2946 Sawyer Lane S.R.V.	
Amy & John Elliott	Home Owner	2226 Barbara Dr SRV	aelliott6621@comcast.net

Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
John Prescott	City of Thousand Oaks	2100 E. Thousand Oaks Blvd. Thousand Oaks CA 91362	jprescott@toaks.org
Maria Prescott	Homeowner	282 Cherry Hills Ct. T.O. 91320	popotitas@yahoo.com

Southern California Edison's Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
Hosted by the California Public Utilities Commission (CPUC)

Meeting Location: Palm Garden Hotel, 495 Ventu Park Road, Thousand Oaks, CA 93120

Date/Time: Wednesday, June 24, 2015 from 6:00 p.m. to 8:00 p.m.

Name	Affiliation	Address	Email address
CARMEN MEDINA		12916 SUNNY LN	
BARRY JOHNSON		12916 SUNNY LN	
Cheryl Collart			cheryl.collart@gmail.com
Phoebe & Don Thomas	Home Owners	10400 Presilla Rd Santa Rosa Valley	
Kim Ranzenger	[illegible]		
Denise Elston			denny@me.com
Karen Field		11370 Wendside Ln. Santa Rosa Valley	karen@dazzleartstudios.com
Donalynn Pritz			dl.pritz@verizon.net

(1)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Jill Lederer, Pres./CEO Greater Conejo Valley Chamber of Commerce

Mailing Address: 600 Hampshire Rd. #300
Thousand Oaks, CA 91360

Organization (if applicable): Greater Conejo Valley Chamber of Commerce

Brief Comment: In support of upgrading of SCE's infrastructure to provide reliable power to our area businesses.

(1.5.)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Kelly Hall

Mailing Address: 2669 Buggy Lane
Santa Rosa Valley

Organization (if applicable): Santa Rosa Valley Estates

Brief Comment: NOTES

(2)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Loi NGUYEN

Mailing Address: INPHI CORPORATION
112 S. LAKEVIEW CANYON RD, Suite 100, WESTLAKE VILLAGE, CA 91362

Organization (if applicable): INPHI CORPORATION

Brief Comment: UNINTERRUPTED POWER IS CRITICAL TO OUR successful design center in Westlake Village | Thousand Oaks, We support the SCE's proposal

(3)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: CATHRYN ANDRESEN

Mailing Address: 9715 SANTA ROSA
CAMARILLO, CA 93012

Organization (if applicable):

Brief Comment: OPPOSED TO project plan

(4)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Molly Peri

Mailing Address: 10530 Presilla Rd
Santa Rosa Valley CA 93012

Organization (if applicable):

Brief Comment:

(5)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Douglas O'Brien

Mailing Address: 7303 Wallaby St
Ventura

Organization (if applicable): The Energy Coalition

Brief Comment: There significant projects Identified (EE, DR, PV, Storage) that can be deployed. Many projects are moving forward and the analysis for the Subtransmission line do not account for them.

(6)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: MARK BURLEY

Mailing Address: 12328 SAN SEBASTIAN CT,
SANTA ROSA VALLEY, CA 93012

Organization (if applicable): SRV MUNICIPAL ADVISORY COUNCIL

Brief Comment: _____

(7)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Alan Lushington

Mailing Address: 10300 Presilla Rd
Camarillo, CA

Organization (if applicable): _____

Brief Comment: CM Needs —

(8)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Penelope Burley

Mailing Address: 12328 San Sebastian Ct
SRV, CA 93012

Organization (if applicable): Res.

Brief Comment: No to power lines. Fire hazard
+ EMFs – not acceptable.

(9)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Damon Wing

Mailing Address: 625 W. Hillcrest Dr.
Thousand Oaks, CA

Organization (if applicable): Ventura County Supervisor Linda Parks' office

Brief Comment:

(10)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: HOWARD CHOY

Mailing Address: 1100 N. EASTERN AVE
L.A., 90063

Organization (if applicable): LA COUNTY / So. CA Regional Energy Network

Brief Comment: Emphasize availability of Preferred Resources in this region.

(11)

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Peggy Ludington

Mailing Address: 10300 E. Presilla Rd
Camarillo CA 93012

Organization (if applicable):

Brief Comment:

12

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: William L. Brandt

Mailing Address: 10767 Citrus Dr.
Moorpark CA

Organization (if applicable): _____

Brief Comment: Oppose passage/completion of Power Lines

13

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Herb Potter

Mailing Address: 10567 Ternez Dr
Mpk, CA 93021

Organization (if applicable): Home Acres

Brief Comment: Maybe

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Davalynn Pritz

Mailing Address: 2993 Yucca Dr.
Santa Rosa Valley

Organization (if applicable): _____

Brief Comment: _____

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 P.M.

Name: Kim Ramseyer

Mailing Address: Ternez Dr Horse Acres

Organization (if applicable): _____

Brief Comment: 3 or 4 questions

Speaker Card

Moorpark-Newbury 66 kV Subtransmission Line Project
Public Meeting
June 24, 2015 at 6:00 p.m.

Name: Ken Gordon

Mailing Address: 2650 Buggy Lane
Santa Rosa Valley, Ca 93012

Organization (if applicable): _____

Brief Comment: About Business having enough
Power + Fear of not having power doesn't
(False sense)
give Edison the power to do what they want

APPENDIX D
Public Meeting Presentation

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California Public Utilities Commission
CEQA Public Comment Meeting

Southern California Edison
Moorpark-Newbury 66 kV Subtransmission Line Project

June 24, 2015
Palm Garden Hotel
495 Ventu Park Road, Thousand Oaks

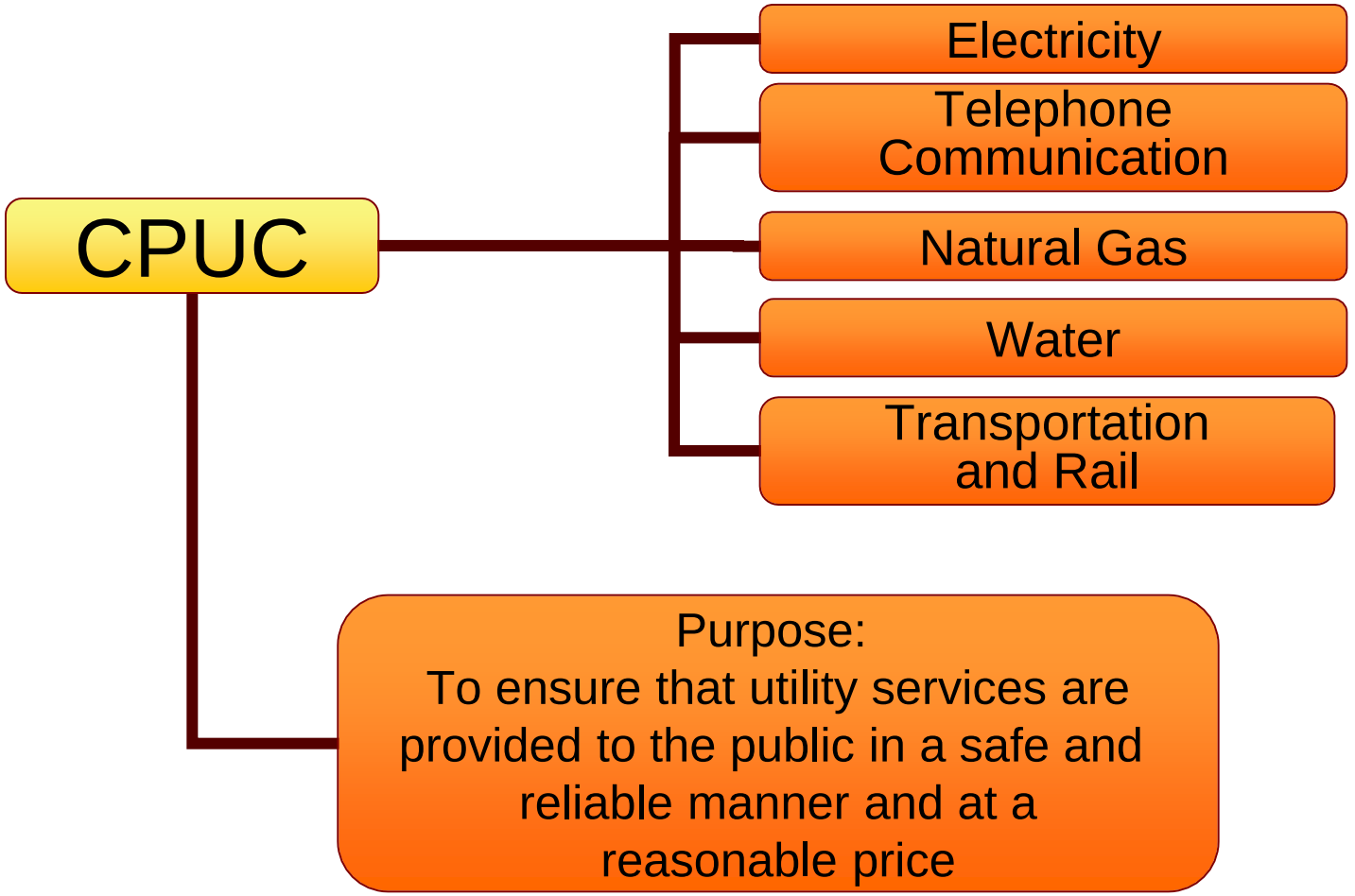
Participants and their Roles

- Mike Rosauer, California Public Utilities Commission (CPUC, the Commission) Project Manager
  - Lead Agency under the California Environmental Quality Act (CEQA)
- Matt Fagundes and Claire Myers, ESA Project Management Team
  - Environmental Consultant for the CPUC
- Southern California Edison
  - Project Applicant
- Public Agencies
- Members of the Public

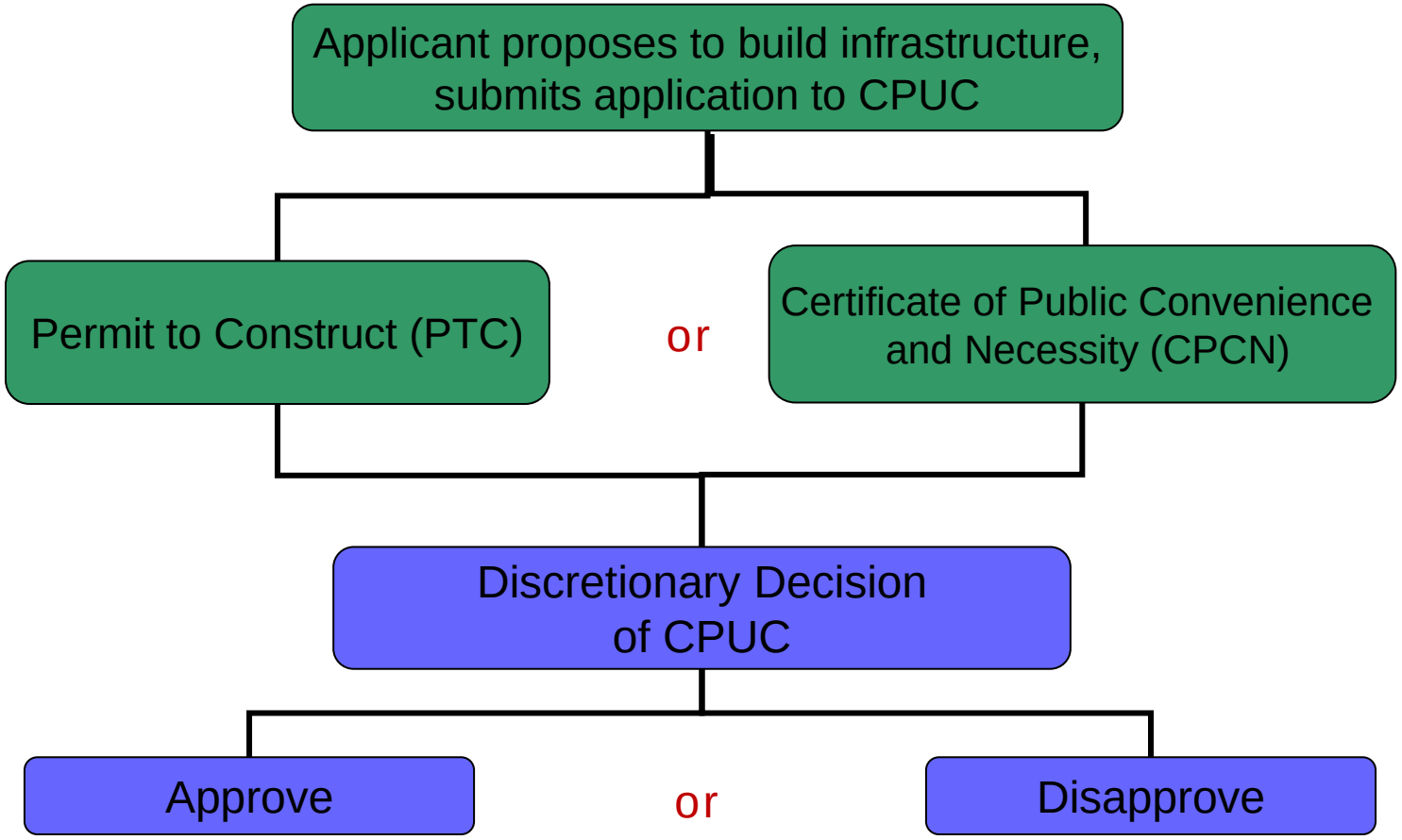
Meeting Agenda

- Overview of the CPUC's Decision and Review Processes
- Overview of the Draft Environmental Impact Report (EIR)
  - Description of the Proposed Project and Alternatives
  - Summary of Potential Environmental Impacts
  - Initial Identification of the Environmentally Superior Alternative
- Public Comments

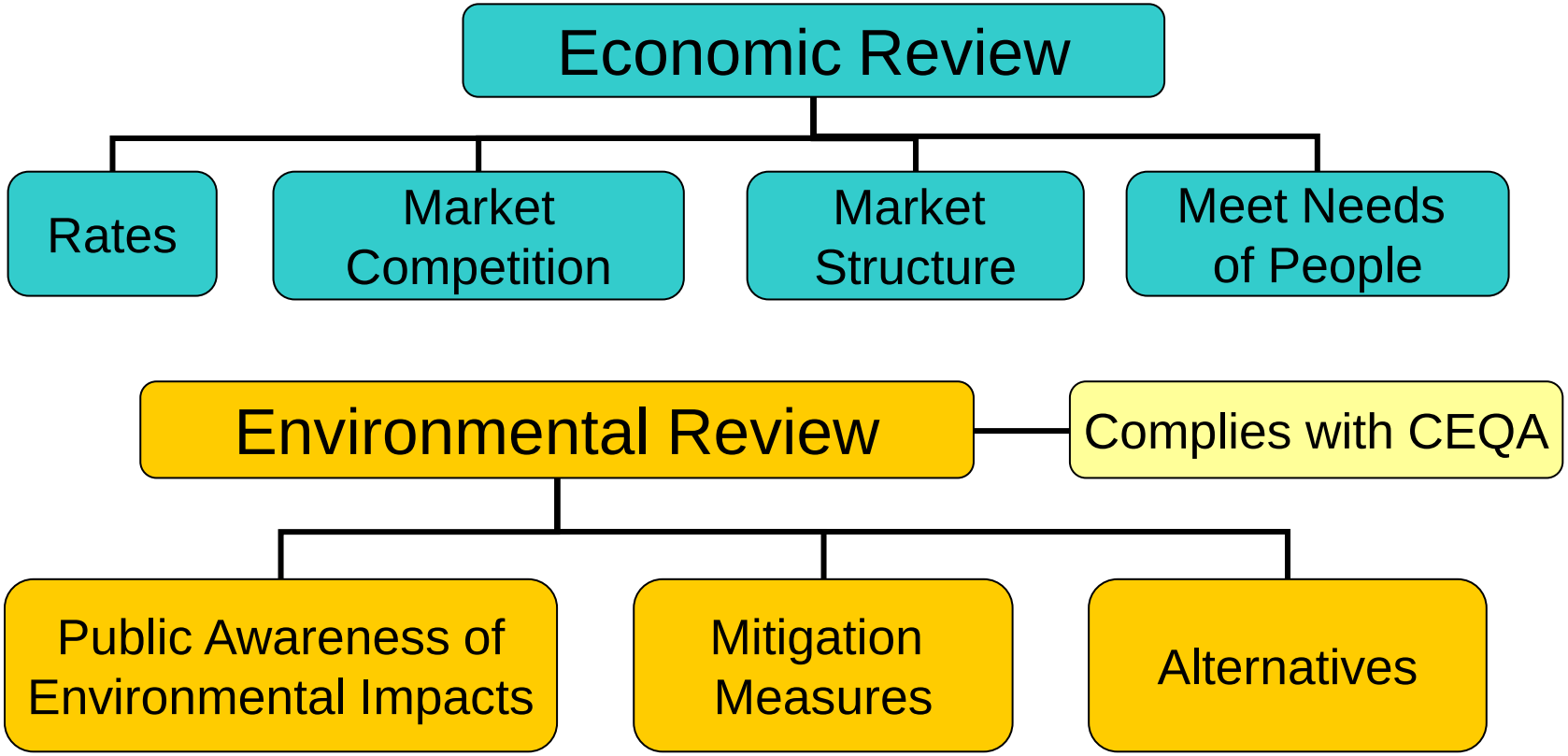
Who does the CPUC regulate?



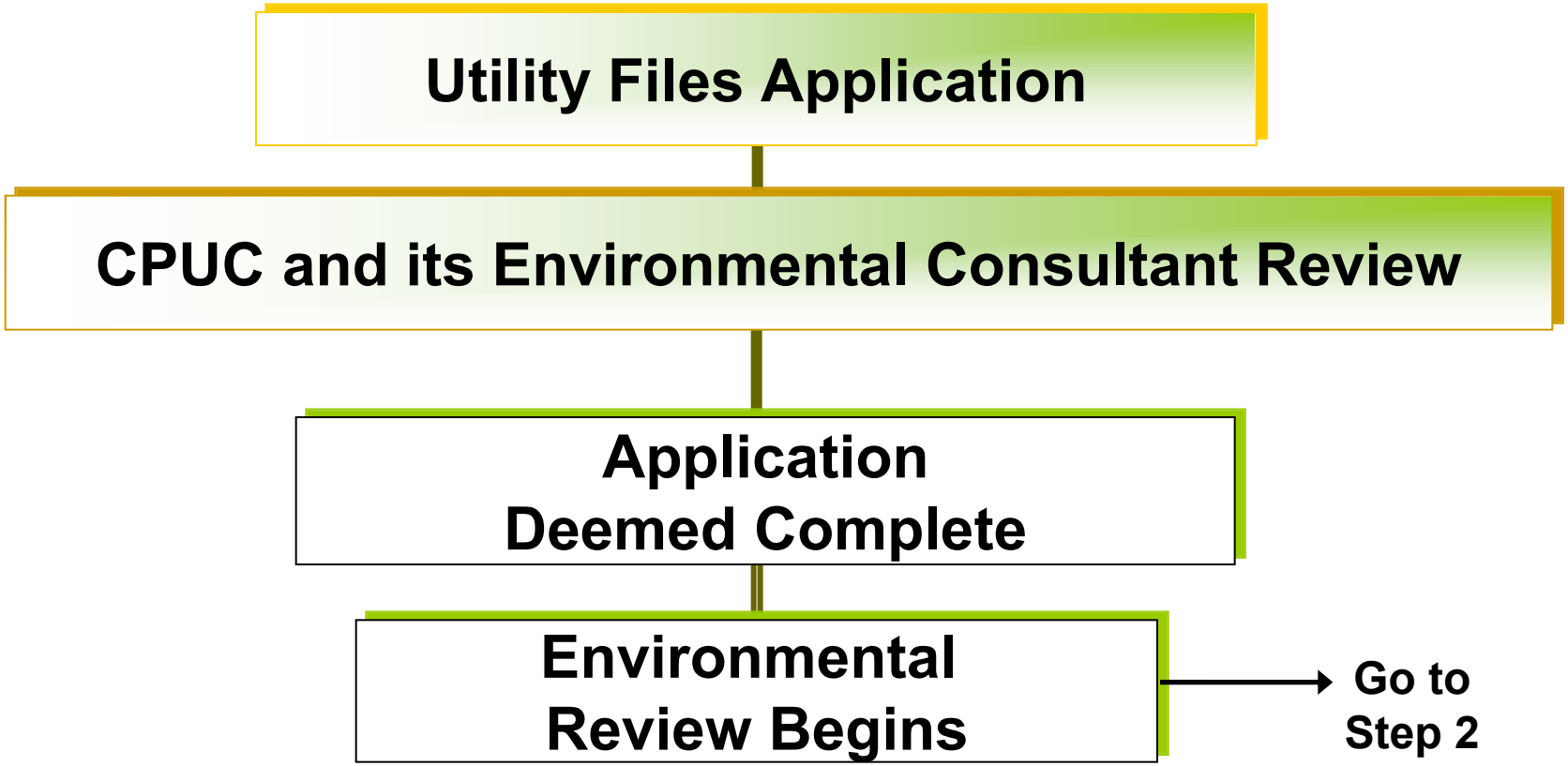
Permit to Construct



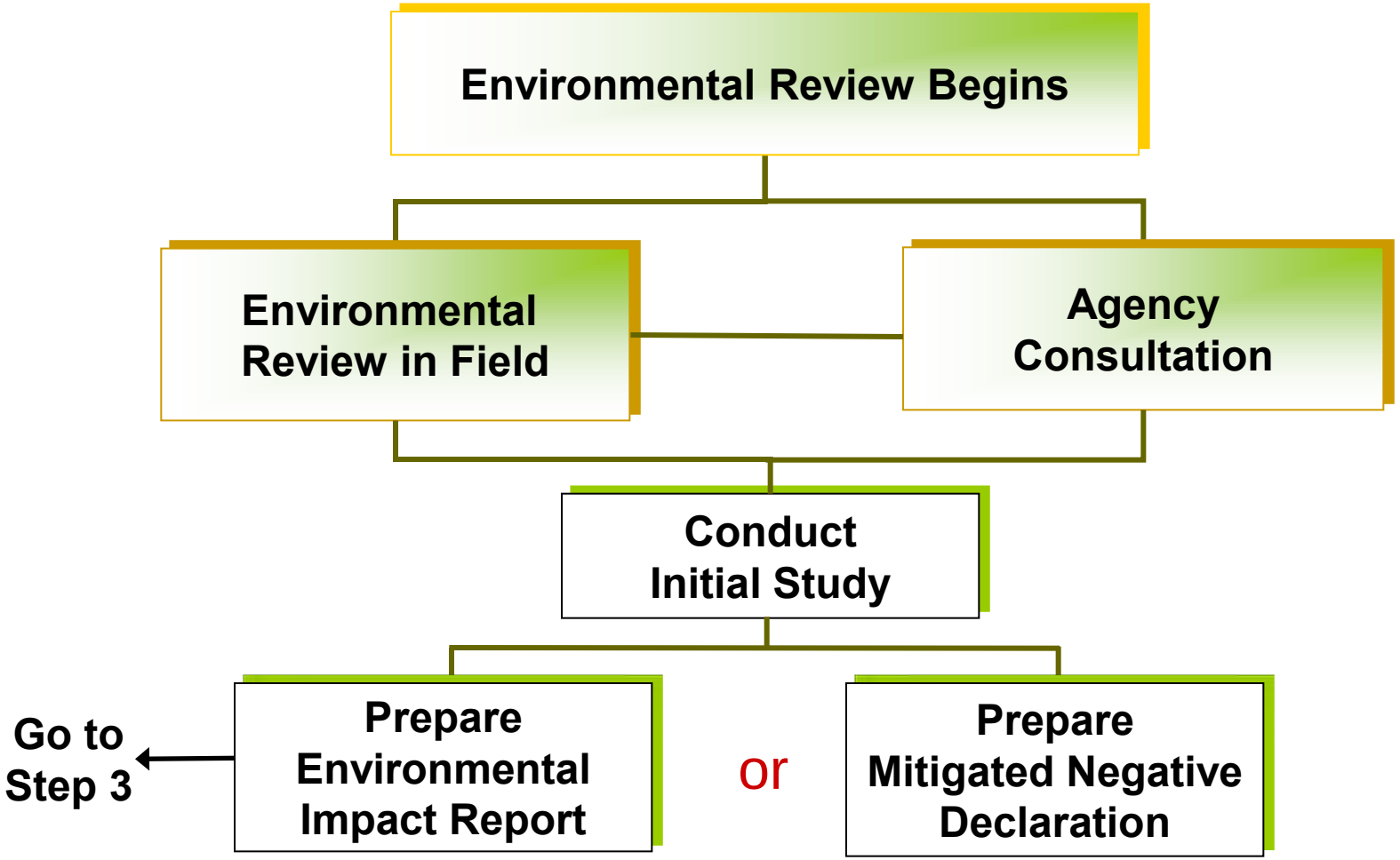
CPUC Review Process



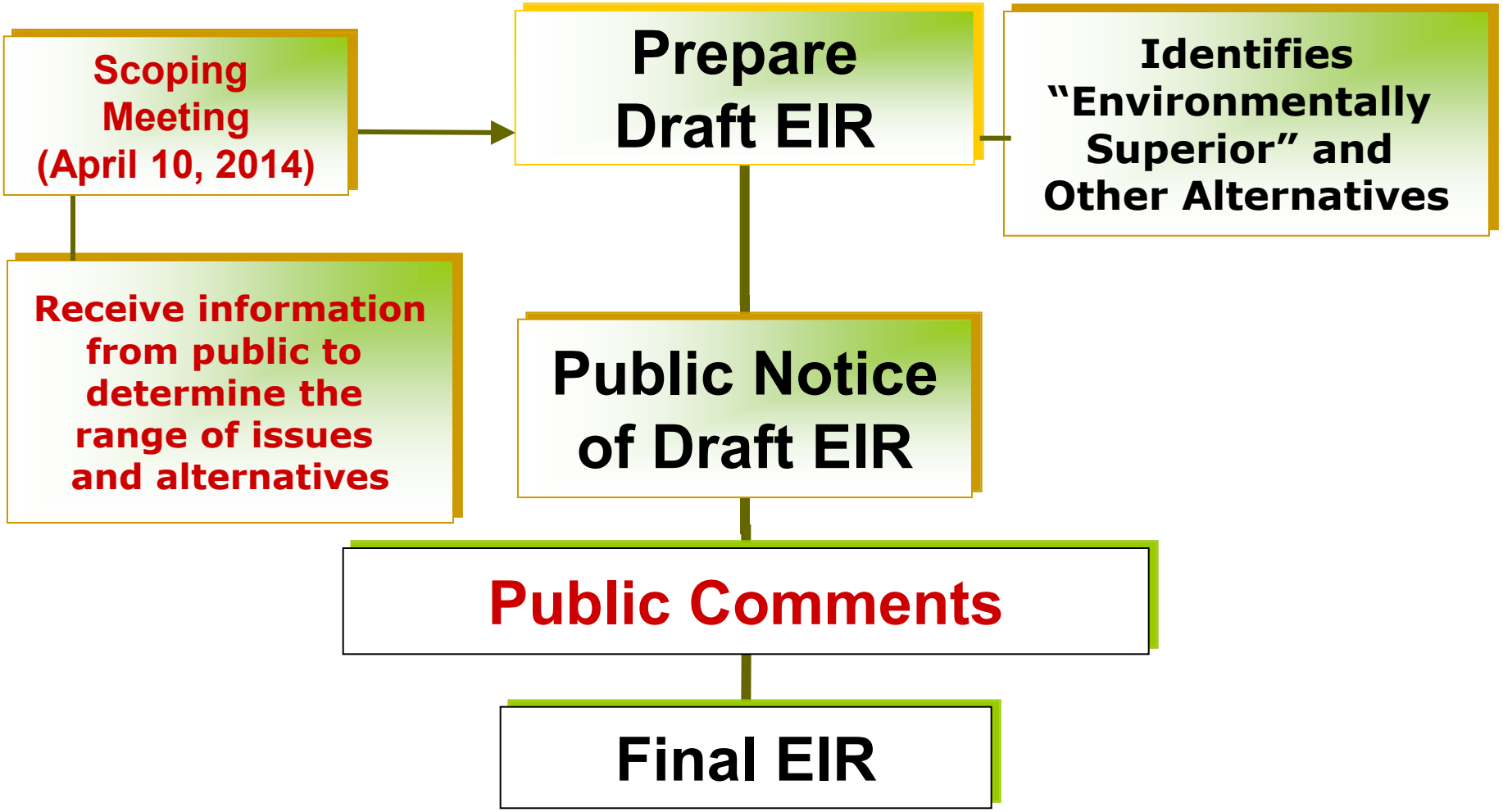
Application & Environmental Review Process (Step 1)



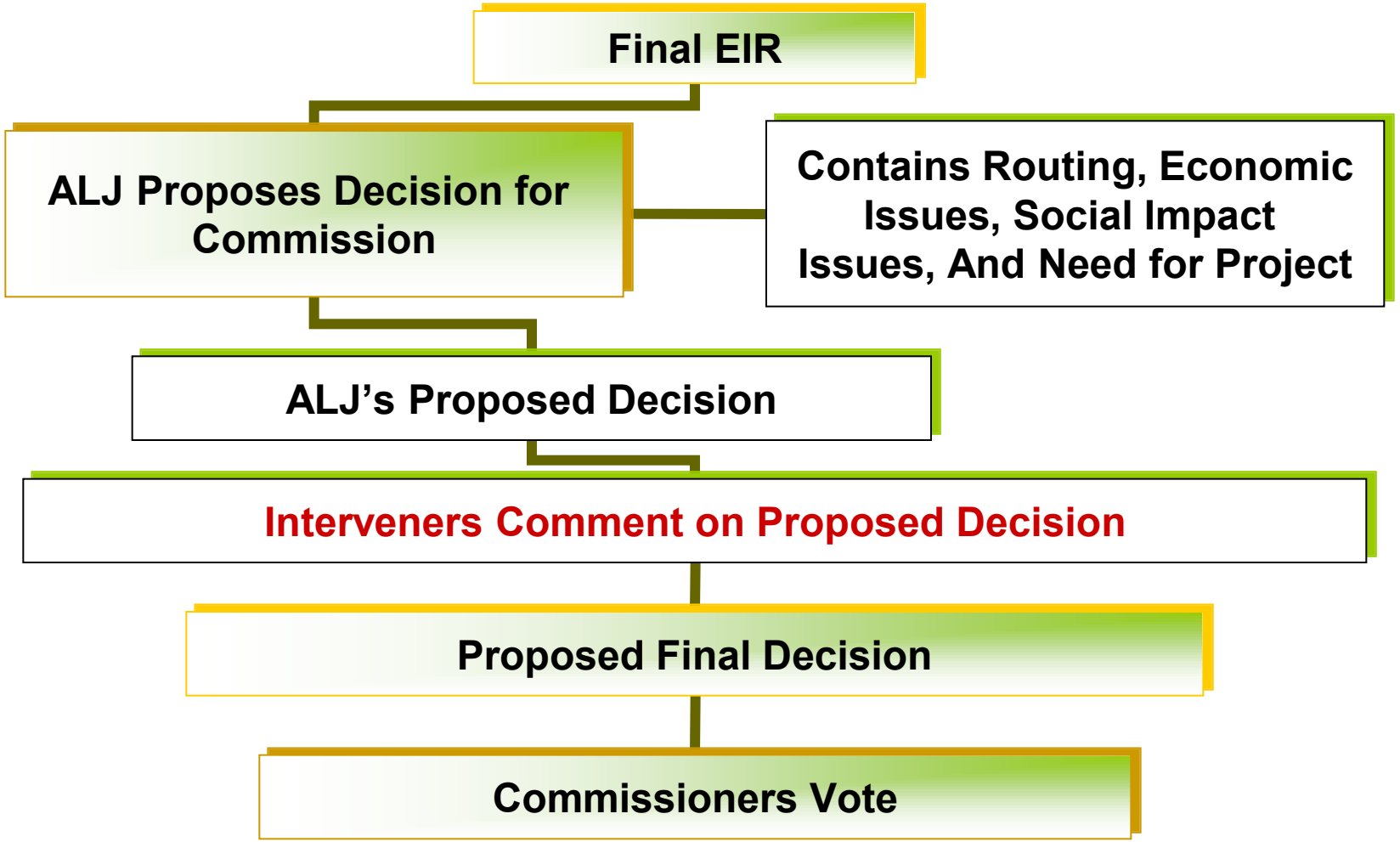
Application & Environmental Review Process (Step 2)



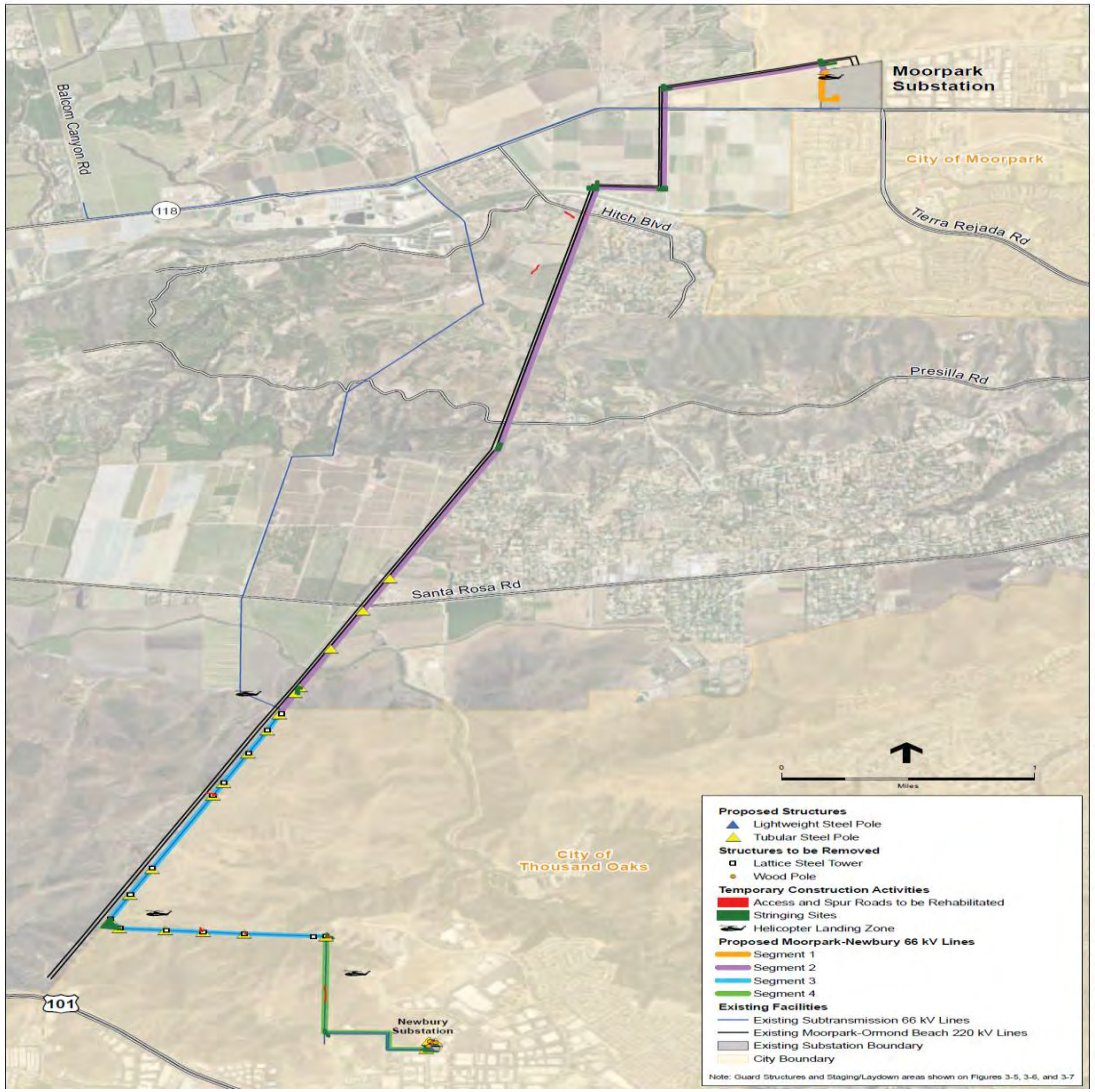
Application & Environmental Review Process (Step 3)



Application & Environmental Review Process (Step 4)



Moorpark-Newbury 66 kV Subtransmission Line Project



Project Background

- 2008: SCE filed Advice Letter 2272-E, requesting that the project be exempt from PTC requirements pursuant to General Order (GO) 131-D, Section III, Subsection B.1.g

- 2010: Following an appeal, CPUC found the project qualified for Exemption g, and SCE began construction of the project.

- 2011: The CPUC granted an Application for a Rehearing brought by several members of the public and ordered all construction activity to be halted. To continue work on the project, SCE would have to file a PTC Application.

- 2013: SCE submitted its PTC Application and Proponent's Environmental Assessment for the Proposed Project, which started the CEQA review process.

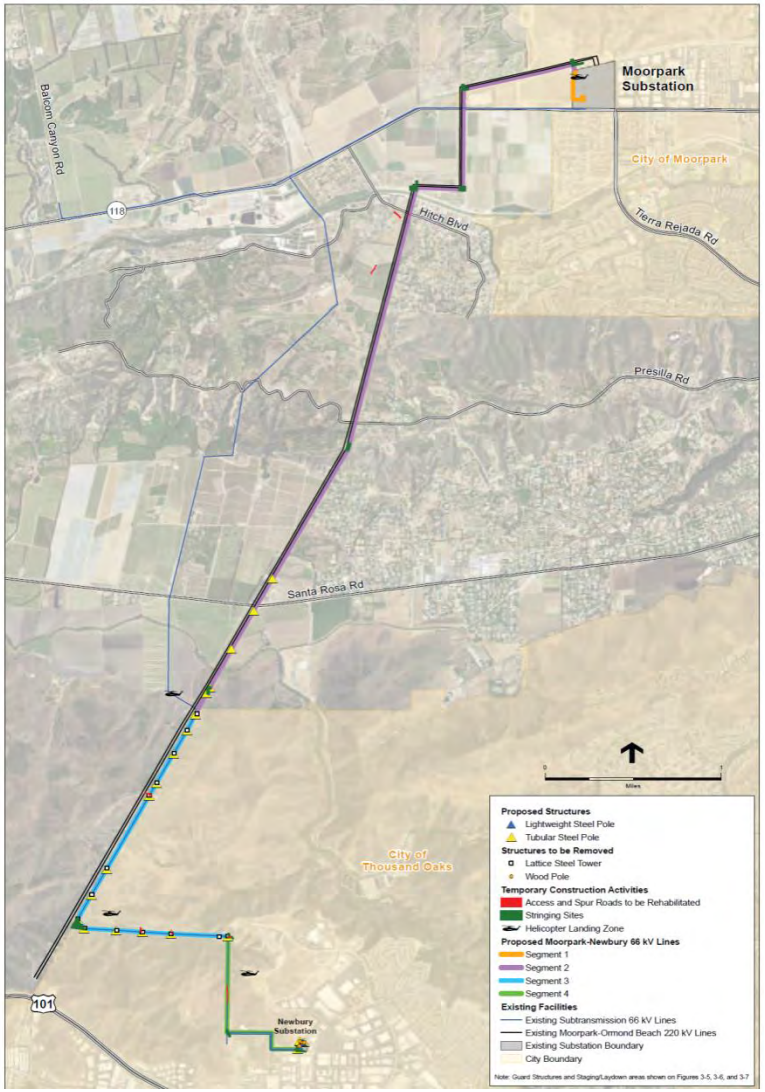
Past Project Activities

- Several components of the project have already been constructed.
- Pursuant to CEQA, the components of the project already constructed at the time the NOP was released are considered to be part of the environmental baseline; and not part of the Proposed Project evaluated in this EIR.
- All of the past construction activities and SCE's evaluation of the associated effects are documented in EIR Chapter 2 (Background).
- The effects of the past construction activities are identified for informational purposes only.

Proposed Project Summary

- SEGMENT 1: Install 500 feet of new underground 66 kV subtransmission line and a new line position in the 66 kV switchrack entirely within Moorpark Substation.

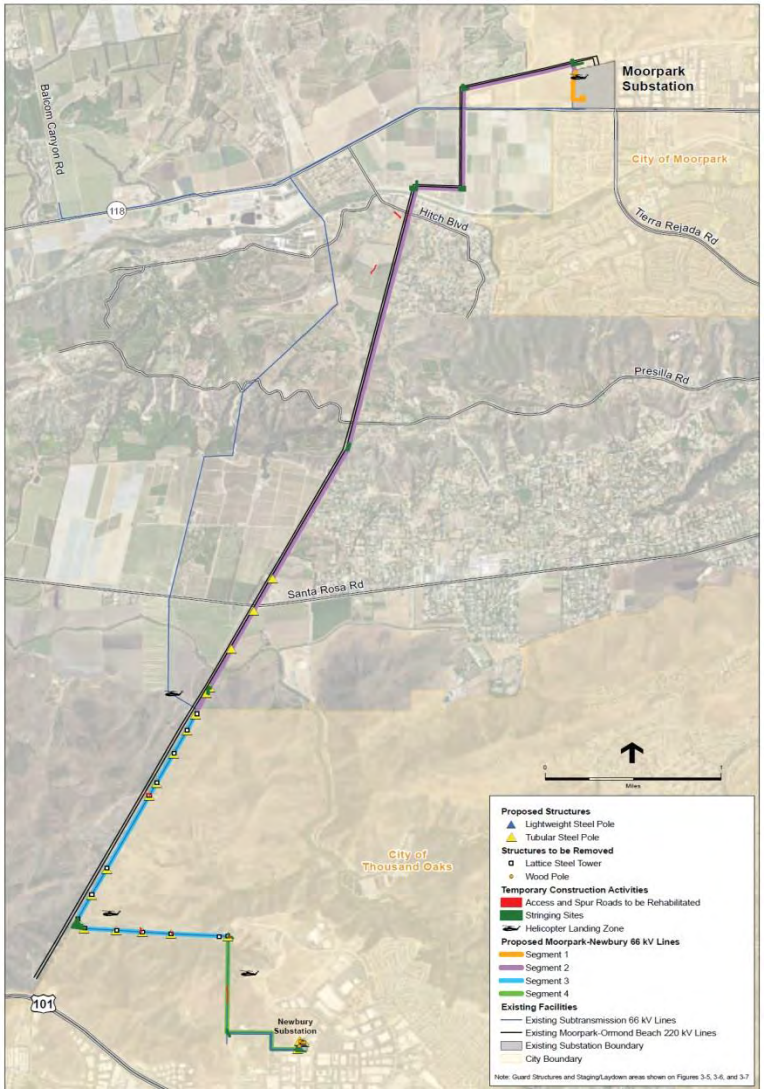
- SEGMENT 2:Install two Tubular Steel Pole (TSP) foundations, four TSPs, a partial TSP, and 5 miles of conductor on the south and east sides of SCE's existing 220 kV right-of-way.



Proposed Project Summary (cont.)

- SEGMENT 3: Install eight TSP foundations, 13 double-circuit TSPs, and 3 miles of conductor for two circuits. Remove 14 existing lightweight steel towers.

- SEGMENT 4: Install 0.5 mile of conductor on previously installed LWS poles into Newbury Substation. Install four TSP foundations, four TSPs, two LWS poles, and a new 66 kV subtransmission line position. Remove six wood poles at Newbury Substation.



Proposed Project Objectives

- **Add capacity to meet forecasted electrical demand.**
- **Maintain sufficient voltage during normal and abnormal system conditions.**
- Maintain system reliability within the Electrical Needs Area.
- Utilize existing ROW and manage existing ROW in a prudent manner in expectation of possible future needs.
- Maintain consistency with the Garamendi Principles passed in Senate Bill (SB) 2431 (Stats. 1988, Ch. 1457) by: (1) using existing ROW by upgrading existing transmission facilities, where technically and economically justifiable; and (2) encouraging the expansion of existing ROW when construction of new transmission lines is required, where technically and economically feasible (CEC, 2007).
- Design and construct the Proposed Project in conformance with SCE's applicable engineering, design, and construction standards.
- Maintain consistency with CPUC GO 95.

Alternatives Screening

Develop a range of alternatives based on input received from the public during scoping. Six alternatives to the Proposed Project were identified. The screening of the six alternatives was completed using the following methodology:

Step 1: Clarify the description of each alternative.

Step 2: Evaluate each alternative using CEQA criteria:

- Does it meet most of the Project objectives?
- Is it feasible economically, environmentally, legally, socially, and technically?
- Does it avoid or substantially lessen any significant effects of the Proposed Project; would it create any greater environmental effects than the Proposed Project?

Step 3: Determine suitability of each alternative for full analysis in the EIR.

Alternatives Screening (cont.)

None of the six alternatives passed screening; therefore, they were eliminated from further analysis in the Draft EIR.

- Alternative 1 – Reconductoring: voltage violations at Newbury Substation
- Alternative 2 – West Side of 220 kV ROW: greater environmental impacts
- Alternative 3 – New 66 kV Line Collocated with the Existing Moorpark-Newbury-Pharmacy 66 kV Line: greater environmental impacts
- Alternative 4 – Reconnect the Camgen Generator to the Moorpark System: voltage violations at Newbury Substation
- Alternative 5 – Demand Side Management: issues meeting demand and reliability objectives; and feasibility on needed scale.
- Alternative 6 – Renewable and Distributed Generation: issues meeting demand and reliability objectives; would still require transmission facilities; and would result in adverse impacts.

Draft EIR Alternatives

Two "No Project" alternative scenarios were selected for full analysis in the Draft EIR:

- No Project Alternative 1
  - Proposed Project not constructed. All infrastructure previously installed for the project would remain in place.
- No Project Alternative 2
  - Proposed Project not constructed. All infrastructure previously installed for the project would be removed.

Summary of Impacts

Following is a summary of the impact levels that would be associated with the Proposed Project and No Project Alternative 2. There would be no environmental impacts associated with No Project Alternative 1.

No Impact	Land Use and Planning, Mineral Resources, and Public Services.
Less than Significant Impact or Less than Significant Impact with Mitigation	Aesthetics, Agriculture and Forestry Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Population and Housing, Recreation, Transportation and Traffic, Utilities and Service Systems
Significant Unavoidable Impact	Air Quality and Noise

- To approve the Proposed Project or No Project Alternative 2, the CPUC would be required to prepare a Statement of Overriding Considerations.

Initial Indication of Environmentally Superior Alternative

- Environmentally Superior Alternative:
  - No Project Alternative 1 would result in the least environmental effects; however, per CEQA Guidelines Section 15126(e)(2), if the Environmentally Superior Alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative among the other alternatives.
  - Because there are no suitable alternatives that are not "no project" alternatives, the Proposed Project preliminarily has been identified as the Environmentally Superior Alternative.

Next Steps

- Notice of Availability was circulated on June 11, 2015, to solicit input on the Draft EIR from agencies and the public
- This meeting is part of the comment process
- All oral and written comments will be considered and addressed in the Final EIR
- CPUC will consider the EIR and other factors, and issue a draft decision for the Proposed Project
- CPUC will consider comments on draft and alternate decisions and will vote on the Project

Public Participation

- Environmental Review
  - Scoping
  - Draft EIR
- General Proceeding
  - The Administrative Law Judge (ALJ) assigned to the proceeding (ALJ Yacknin) will schedule a prehearing conference as soon as practicable.
  - On June 11, 2015, the ALJ ruled that parties who wish to present evidence on the identification of significant environmental impacts, mitigation measures, and the environmentally superior alternative must do so through public comment on the Draft EIR.

How to Comment on the Draft EIR

Mr. Michael Rosauer
Moorpark-Newbury Project
c/o Environmental Science Associates
1425 N. McDowell Blvd, Suite 200
Petaluma, CA 94954
Phone: (707) 795-0926
E-mail: Moorpark-Newbury@esassoc.com

Website:
http://www.cpuc.ca.gov/Environment/info/esa/moorpark_newbury/index.html

Deadline: July 27, 2015

Public Comments

Comment Guidelines

- One person to speak at a time
- Be concise
- Stay on topic
- Support everyone's participation
- Respect others' opinions
- Comments will be recorded
- Written comments are encouraged

APPENDIX E

Mailing List and Certificate of Service

TABLE 1
MASTER MAILING LIST:
AGENCIES, ORGANIZATIONS, AND INDIVIDUALS
SENT A HARD COPY OF FINAL EIR VIA OVERNIGHT DELIVERY SERVICE

AGENCY/ORGANIZATION	TITLE OR DIVISION	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Lead Agency/Applicant							
California Public Utilities Commission	Project Manager	Mike	Rosauer	505 Van Ness Avenue Area 4-a	San Francisco	CA	94102
California Public Utilities Commission	Legal Division	Jack M.	Mulligan	770 L Street, Suite 1250	Sacramento	CA	95812
California Public Utilities Commission	Administrative Law Judge	Hallie	Yacknin	505 Van Ness Avenue, Room 5108	San Francisco	CA	94102-3214
California Public Utilities Commission, Legal Division		Rashid A.	Rashid	505 Van Ness Avenue, Room 5131	San Francisco	CA	94102-3214
Southern California Edison Company	Principal Advisor - Regulatory Affairs Department (Project Manager)	Tom	Burhenn	2244 Walnut Grove Avenue Quad 3D, 388L	Rosemead	CA	91770
Southern California Edison Company	Senior Attorney	Tammy	Jones	2244 Walnut Grove Avenue, PO Box 800	Rosemead	CA	91770
State Agency							
California State Clearinghouse				1400 Tenth Street	Sacramento	CA	95814
Library							
Grant R. Brimhall Library				1401 East Janss Road	Thousand Oaks	CA	91362
Moorpark City Library				699 Moorpark Avenue	Moorpark	CA	93021
Newbury Park Branch Library				2331 Borchard Road	Newbury Park	CA	91320
Organizations and Individuals							
		Alan and Peggy	Ludington	10300 E. Presilla Road	Santa Rosa Valley	CA	93012
		Krista and Phil	Pederson	10767 Citrus Drive	Moorpark	CA	93021
		David	Tanner	223 62nd Street	Newport Beach	CA	92663
		Cheryle M. and Herb	Potter	10567 Ternez Drive	Moorpark	CA	93012
		Danalynn	Pritz	3625 East Thousand Oaks Boulevard, Suite 182	Westlake Village	CA	91362
		James	Porter	4305 Hitch Boulevard	Moorpark	CA	93021
		Therese and Donald	Walker	10761 Citrus Drive	Moorpark	CA	93021
Center for Biological Diversity	Staff Attorney	April Rose	Sommer	1212 Broadway Street, #800	Oakland	CA	94612

TABLE 2
MASTER MAILING LIST:
AGENCIES, ORGANIZATIONS, AND INDIVIDUALS
SENT A COMPACT DISC (CD) OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY/ORGANIZATION/ INDIVIDUAL	TITLE	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Agencies							
Ventura County Air Pollution Control District		Alicia	Stratton	669 County Square Drive	Ventura	CA	93003
Ventura County Board of Supervisors		Damon	Wing	625 W. Hillcrest Drive	Thousand Oaks	CA	91360
County of Ventura Resource Management Agency		Laura	Hocking	800 South Victoria Avenue, L #140	Ventura	CA	93009
County of Ventura Resource Management Agency		Whitney	Wilkinson	800 South Victoria Avenue, L #140	Ventura	CA	93009
County of Ventura Resource Management Agency		Aaron	Engstrom	800 South Victoria Avenue, L #140	Ventura	CA	93009
County of Ventura Resource Management Agency	Manager	Tricia	Maier	800 South Victoria Avenue, L #140	Ventura	CA	93009
County of Ventura, Public Works Agency, Transportation Department	Engineering Manager	Ben	Emami	800 S. Victoria Avenue, L #1600	Ventura	CA	93009
County of Ventura, Public Works Agency, Integrated Waste Management Division	Staff Services Manager	Derrick	Wilson	800 S. Victoria Avenue, L #1600	Ventura	CA	93009
County of Ventura, Public Works Agency, Integrated Waste Management Division		Pandee	Leachman	800 S. Victoria Avenue, L #1600	Ventura	CA	93009
Ventura County Watershed Protection Agency	Manager	Zia	Hosseinpour	800 S. Victoria avenue	Ventura	CA	93009
Conejo Open Space Conservation Agency	Manager	Shelly	Mason	City Hall/ Civic Arts Plaza 2100 Thousand Oaks Boulevard	Thousand Oaks	CA	91362
County of Ventura Board of Supervisors	Supervisor	Kathy I.	Long	800 S. Victoria Avenue	Ventura	CA	93009
City of Thousand Oaks Community Development Department	Senior Planner	Richard A.	Burgess	2100 Thousand Oaks Boulevard	Thousand Oaks	CA	91362

TABLE 2 (Continued)
MASTER MAILING LIST:
AGENCIES, ORGANIZATIONS, AND INDIVIDUALS
SENT A COMPACT DISC (CD) OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY / ORGANIZATION	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Organizations						
Santa Rosa Valley Estates	Kelly	Hall	2669 Buggy Lane	Santa Rosa Valley	CA	93012
Hidden Meadows Estates Homeowners Association	Cheryl	Crandall	1534 N. Moorpark Road #404	Thousand Oaks	CA	91360
Greater Conejo Valley Chamber of Commerce	Jill	Lederer	600 Hampshire Road #200	Thousand Oaks	CA	91361
The Energy Coalition	Douglas	O'Brien	7303 Wallaby Street	Ventura	CA	93003
Center for Biological Diversity	Ileene	Anderson	8033 Sunset Boulevard, #477	Los Angeles	CA	90046
Santa Rosa Valley Municipal Advisory Council	Rosemary	Allison	11521 Sumac Lane	Camarillo	CA	93012
Wildwood Ranch Homeowner's Association	Rosemary	Allison	883 Westlake Boulevard	Westlake Village	CA	91361
Rancho Santa Rosa Property Owners' Association Club House	Mark	Burley	11701 East Las Posas Road	Camarillo	CA	93012
Case Administration, Southern California Edison Company			2244 Walnut Grove Ave, PO Box 800	Rosemead	CA	91770
Southern California Edison Company	Robert D.	Pontelle	2244 Walnut Grove Ave, PO Box 800	Rosemead	CA	91770
Douglass and Liddell	Don C.	Liddell	2928 2nd Avenue	San Diego	CA	92103
California Energy Markets			425 Divisadero Street, Suite 303	San Francisco	CA	94117
Office of Assembly Member Jacqui Irwin	Morgan	Culbertson	2301 E Daily Drive	Camarillo	CA	93010
Southern California Edison Company	Chris	Peck	2244 Walnut Grove Avenue Quad 3D, 388L	Rosemead	CA	91770
Southern California Edison Company	Rosalie	Bareinas	2244 Walnut Grove Avenue Quad 3D, 388L	Rosemead	CA	91770
Acorn Newspaper	Becca	Witnall	30423 Canwood St., Ste. 108	Agoura Hills	CA	91301
City of Thousand Oaks	John	Prescott	2100 E. Thousand Oaks Boulevard	Thousand Oaks	CA	91362
Office of State Senator Fran Pavley	Dusty	Russell	5016 N. Parkway Calabasas STE 222	Calabasas	CA	91384
Individuals						
	Marnie and Lou	Volpe	2391 Rose Lane	Santa Rosa Valley	CA	93102
	Will	Westerling	10275 Presilla Road	Santa Rosa Valley	CA	93102
	Brooks and Tom	Bonvenuto	2431 Glenside Lane	Santa Rosa Valley	CA	93012
	Brendan	Fitzpatrick	11998 Pradera Road	Santa Rosa Valley	CA	93021

TABLE 2 (Continued)
MASTER MAILING LIST:
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SENT A COMPACT DISC (CD) OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY / ORGANIZATION	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Individuals (cont.)						
	Pamela	Johnson	2431 Glenside Lane	Santa Rosa Valley	CA	93012
	Tammy	Gunther	10231 Principe Place	Santa Rosa Valley	CA	93012
	Denise	Elston	13253 Butterfield Road	Santa Rosa Valley	CA	93012
	Linda and Kevin	Cannon	11621 Presilla Road	Santa Rosa Valley	CA	93012
	John and Amy	Elliot	2226 Barbara Drive	Santa Rosa Valley	CA	93012
	Barbara L.	Moore	2493 Roxy Street	Simi Valley	CA	
	Patricia	Becker	2999 Yucca Drive	Santa Rosa Valley	CA	93012
	Merrill	Berge	11 Natalie Way	Camarillo	CA	93010
	Nina	Brandt	381 Pepperwood Court	Thousand Oaks	CA	91360
	Nicole	Hauth	10767 Citrus Drive	Moorpark	CA	93021
	Jimmie	Johnson	2351 Applewood Lane	Santa Rosa Valley	CA	93012
	Marie and Houchyar	Zolfagheri	3039 Redondo Avenue	Santa Rosa Valley	CA	93012
	Kristine	Supple	2985 Yucca Drive	Santa Rosa Valley	CA	93012
	Hillary	Wilkinson	2309 Yucca Way	Camarillo	CA	93012
	Kimme	Black	12486 Saddleridge Court	Santa Rosa Valley	CA	93012
	Cathryn	Andresen	9715 Santa Rosa Road	Camarillo	CA	93012
	Johanne	Zell	2884 Redondo Avenue	Santa Rosa Valley	CA	93012
	Ralph and Marvella	Carmichael	11848 Presilla Road	Santa Rosa Valley	CA	93012
	Nancy	Harris	11969 Presilla Road	Santa Rosa Valley	CA	93012
	Carole	Hunter	11799 Pradera Road	Santa Rosa Valley	CA	93012
	L.	Vanoni	12549 Andalusia Drive	Santa Rosa Valley	CA	93012
	Arline	Young	2896 Las Brisas Drive	Santa Rosa Valley	CA	93012
	Lidia	Bailey	12216 Alison Drive	Santa Rosa Valley	CA	93012
	Barry	Becker	2999 Yucca Drive	Santa Rosa Valley	CA	93012
	Barry	Brown	11874 Pradera Drive	Santa Rosa Valley	CA	93012

TABLE 2 (Continued)
MASTER MAILING LIST:
AGENCIES, ORGANIZATIONS, AND INDIVIDUALS
SENT A COMPACT DISC (CD) OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY / ORGANIZATION	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Individuals (cont.)						
	Suzanne	Camejo	11874 Pradera Road	Santa Rosa Valley	CA	93012
	John and Jessica	Grahm	3362 N. Cajon Circle	Santa Rosa Valley	CA	93012
	Doug and Jennifer	Price	10389 Santa Rosa Rd	Santa Rosa Valley	CA	93012
	Robert	Wyman	13512 Andalusia Drive	Santa Rosa Valley	CA	93012
	CR	Cronin	1912 Maya Pradera Land	Thousand Oaks	CA	93021
	Molly	Pei	10530 Presilla Road	Santa Rosa Valley	CA	93012
	Penelope	Burley	12328 San Sebastian Court	Santa Rosa Valley	CA	93012
	Howard	Choy	1100 N. Eastern Ave.	Los Angles	CA	90063
	Nina and Bill	Brandt	10767 Citrus Drive	Santa Rosa Valley	CA	93012
	Kim	Ramseyer	3883 Ternez Drive	Moorpark	CA	93021
	Ken and Linda	Gordon	2650 Buggy Lane	Santa Rosa Valley	CA	93012
	Jan	Levin	2768 Marvella Court	Santa Rosa Valley	CA	93012
	Kathleen and Kent	Corzine	2758 Las Posas Circle	Santa Rosa Valley	CA	93012
	David and Pamela	Hage	13025 Ripple Creek Lane	Santa Rosa Valley	CA	93012
	Vernon	Dransfeldt	11648 Barramca Road	Santa Rosa Valley	CA	93012
	Joseph and Jane	Riggio	2888 Los Fresno Circle	Santa Rosa Valley	CA	93012
	Loi	Nguyen	2953 Bunker Hill Lane, Suite 300	Santa Clara	CA	95054
	Terry and John	Milligan	3321 Chestnut Lane	Camarillo	CA	93012
	Karen	Field	11370 Glenside Lane	Santa Rosa Valley	CA	91320
	Phalba and Don	Thomas	10400 Presilla Road	Santa Rosa Valley	CA	91320
	James	Fortney	P.O. Box 3419	Camarillo	CA	93011
	Trevor	Ludington	10300 Presilla Road	Santa Rosa Valley	CA	93012
	Thrasa	Iyer	3902 Avendia Verano	Thousand Oaks	CA	91360
	Wes	Shipway	10486 Summer View Cir.	Santa Rosa Valley	CA	93012
	Clay	Eichenseer	625 Overlook Road	Santa Rosa Valley	CA	93012

TABLE 2 (Continued)
MASTER MAILING LIST:
AGENCIES, ORGANIZATIONS, AND INDIVIDUALS
SENT A COMPACT DISC (CD) OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY / ORGANIZATION	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
Individuals (cont.)						
	Susan and Gary	Arbogast	2866 Los Fresnos	Santa Rosa Valley	CA	93012
	Maria	Prescott	282 Cherry Heights Court	Thousand Oaks	CA	91320
	Carmen	Medina	12916 Sunny Lane	Thousand Oaks	CA	91320
	Barry	Johnson	12916 Sunny Lane	Thousand Oaks	CA	91320

TABLE 3
MASTER MAILING LIST:
INDIVIDUALS SENT A DIGITAL COPY OF FINAL EIR VIA EMAIL

FIRST NAME	LAST NAME
Individuals	
Jerami	Prendiville
Donna	Johanson
Dom	Thomas
Susan	Garlogest
Shirley I.	Fortney
Arken	Gordon
Janet M.	Wall
Cheryl	Callart

Certificate of Service

We, Anthony Padilla, of Environmental Science Associates, and Stan Williams, of Phoenix1 Printing, certify that we have on this date caused the following:

Publication of the Final EIR for Southern California Edison's (SCE) Application to the California Public Utilities Commission (CPUC) pursuant to General Order (GO) 131-D to construct and operate the Moorpark-Newbury 66 kilovolt Subtransmission Line Project (A.13-10-021). Hard copies of the Final EIR are to be served by overnight delivery service to the Lead Agency (the CPUC), the project Applicant (SCE), area libraries, and members of the CPUC Service List. A compact disc of the Final EIR is to be served by United States Postal Service (USPS) mail to all other agencies, organizations, and individuals that submitted comments on the Draft EIR and provided a mailing address. A comprehensive mailing list is included in Appendix E of the Final EIR.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed on October 30, 2015 in San Francisco and Concord, California.

Anthony Padilla

Stan Williams

APPENDIX F

Mitigation Monitoring, Reporting, and Compliance Program

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PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM

SOUTHERN CALIFORNIA EDISON'S
MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE
PROJECT (APPLICATION NO. A.13-10-021)

INTRODUCTION

This document describes the mitigation monitoring, reporting, and compliance program (MMRCP) for ensuring the effective implementation of the mitigation measures required for approval by the California Public Utilities Commission (CPUC, or Commission) of the application by Southern California Edison (SCE) to construct, operate, and maintain the Moorpark-Newbury 66 kV Subtransmission Line Project (Proposed Project). The MMRCP includes all measures proposed by SCE (applicant proposed measures, APMs), and all mitigation measures identified by the CPUC to reduce potentially significant impacts to less than significant.

If the Proposed Project is approved, this document would serve as a self-contained general reference for the MMRCP adopted by the Commission for the Proposed Project. If and when the Proposed Project is approved by the Commission, the CPUC will compile the Final MMRCP to assure that it includes all measures as adopted in the Final Environmental Impact Report (EIR).

California Public Utilities Commission – MMRCP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval be implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a mitigation monitoring or reporting program when it approves a project that is subject to preparation of an EIR and where the EIR for the project identifies potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of a MMRCP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMRCP as a working guide to

facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The Commission will address its responsibility under Public Resources Code Section 21081.6 when it takes action on SCE's application. If the Commission approves the application, it will also adopt this MMRCP that includes the mitigation measures as well as the Applicant Proposed Measures (APMs), implementation of which will ultimately be made a condition of approval by the Commission.

Because the CPUC must decide whether or not to approve the SCE application and because the Proposed Project may cause either direct or reasonably foreseeable indirect effects on the environment, CEQA requires the CPUC to consider the potential environmental impacts that could occur as the result of its decisions and to consider mitigation for any identified significant environmental impacts.

If the CPUC approves SCE's application for authority to construct and operate the Proposed Project, SCE would be responsible for implementation of any mitigation measures governing both construction and future operation of the Proposed Project. Though other state and local agencies would have permit and approval authority over some aspects of construction of the subtransmission line, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by this EIR. All approvals and permits obtained by SCE would be submitted to the CPUC for mitigation compliance prior to commencing the activity for which the permits and approvals were obtained.

In accordance with CEQA, the CPUC reviewed the impacts that would result from approval of the application. The activities considered include the construction, operation, and maintenance of the new Moorpark-Newbury 66 kV Subtransmission Line and upgrading the existing Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line to address forecasted overloads on a section of the existing line and to enhance reliability and operational flexibility. The CPUC review concluded that Proposed Project implementation could result in significant unmitigable impacts pertaining to air quality and noise. All other potential impacts would be less than significant or would be mitigated to less-than-significant levels. The CPUC has included the stipulated mitigation measures as well as SCE's APMs as conditions of approval of the applications and has circulated a Draft and Final EIR.

The attached EIR presents and analyzes potential environmental impacts that would result from construction, operation, and maintenance of the Proposed Project, and proposes mitigation measures as appropriate. Based on the EIR, approval of the application would have no impacts or less than significant impacts in the following areas:

- Agriculture and Forestry Resources
- Energy Conservation
- Greenhouse Gas Emissions
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

The following environmental issue areas were determined to have potentially significant impacts that would be reduced to less-than-significant levels with mitigation:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Transportation and Traffic

The EIR indicates that approval of the application would result in significant unmitigable impacts in the in the areas of:

- Air Quality
- Noise

Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMRCP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures required by the CPUC are implemented and that mitigated environmental impacts are reduced to the level identified in the Program. The CPUC has the authority to halt any activity associated with the Proposed Project if the activity is determined to be a deviation from the approved project or the adopted mitigation measures.

The CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC, along with its mitigation monitor, will ensure that any variance process, which will be designed specifically for the approved project, or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements; no project variance will be approved by the CPUC if it creates new significant environmental impacts. As defined in this MMRCP, a variance should be strictly limited to minor project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A change to the approved project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project and adopted mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the mitigation monitor assigned to the construction for their review and CPUC approval. In some cases, a variance also may require approval by a CEQA responsible agency.

Enforcement and Responsibility

The CPUC is responsible for enforcing the procedures for monitoring through the environmental monitor. The environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the approved project if the activity is determined to be a deviation from the approved project or adopted mitigation measures. The CPUC may assign its authority to their environmental monitor.

Mitigation Compliance Responsibility

SCE is responsible for successfully implementing all of the adopted APMs and mitigation measures in this MMRCP. The MMRCP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

SCE shall inform the CPUC and its mitigation monitor in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with its mitigation monitor, will assess whether alternative mitigation is appropriate and specify to SCE the subsequent actions required.

Dispute Resolution Process

This MMRCP is expected to reduce or eliminate many of the potential disputes concerning the implementation of the adopted measures. However, in the event that a dispute occurs, the following procedure will be observed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.

- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved project or adopted MMRCP.

- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMRCP or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.

- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited relief.

General Monitoring Procedures

Mitigation Monitor

Many of the monitoring procedures will be conducted during the construction phase of the approved project. The CPUC and the mitigation monitor are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SCE. To oversee the monitoring procedures and to ensure success, the mitigation monitor assigned to the construction must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The mitigation monitor is responsible for ensuring that all procedures specified in this MMRCP are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures and APMs require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in this MMRCP, will be taken:

- SCE shall require all contractors to comply with the conditions of project approval, including all applicable APMs and mitigation measures.

- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.

- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all APMs mitigation measures requiring their attention.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the mitigation monitor assigned to the construction. A monitoring record form will be submitted to the mitigation monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the mitigation monitor. A checklist will be developed and maintained by the mitigation monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The mitigation monitor will note any problems that may occur and take appropriate action to rectify the problems. SCE shall provide the CPUC with written quarterly reports of the approved project, which shall include progress of construction, resulting impacts, mitigation implemented, and all

other noteworthy elements of the approved project. Quarterly reports shall be required as long as mitigation measures are applicable.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CPUC on request. The CPUC and SCE will develop a filing and tracking system.

Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMRCP to ensure compliance during approved project implementation (Pub. Res. Code §21081.6):

- The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined above; and

- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

Mitigation Monitoring, Reporting and Compliance Program

The table attached to this MMRCP presents a compilation of APMs and mitigation measures in the EIR. The purpose of the table is to provide a single comprehensive list of impacts, APMs, mitigation measures, monitoring and reporting requirements, and timing.

TABLE F-1
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Aesthetics				
Impact 5.1-2: Use of temporary staging and laydown areas during the construction period would result in adverse impacts to visual quality.	**Mitigation Measure 5.1-2a:** SCE shall not place equipment at the laydown or conductor stringing areas any sooner than two weeks prior to the required use. **Mitigation Measure 5.1-2b:** SCE shall coordinate with the Conejo Open Space Conservation Agency (COSCA) to ensure that designated trails in the vicinity of the Proposed Project are not blocked by the laydown areas or conductor stringing areas, or otherwise provide for safe substitute means of access for recreational trail users. SCE shall coordinate with COSCA to post signage at trailheads within the Conejo Canyons Open Space area, alerting recreationalists to construction locations and dates.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
Impact 5.1-3: Use of temporary construction conductor stringing sites during the approximately 10-month construction period could result in adverse impacts to visual quality.	Implement Mitigation Measures 5.1-2a and 5.1-2b.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
Impact 5.1-6: If night lighting is required during construction, the Proposed Project could adversely affect nighttime views in the Proposed Project area.	**Mitigation Measure 5.1-6:** SCE shall design and install all new lighting at construction areas, including construction and storage yards and staging areas, such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the construction areas, vicinity, and nighttime sky is minimized. SCE shall submit a *Construction Lighting Mitigation Plan* to the CPUC for review and approval at least 90 days prior to the start of construction. SCE shall not use any exterior lighting fixtures or components until the *Construction Lighting Mitigation Plan* is approved by the CPUC. The Plan shall include but is not limited to the following measures: • Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to minimize light trespass outside the area requiring illumination.	SCE and its contractors to implement measure as defined.	A *Construction Lighting Mitigation Plan* shall be submitted to the CPUC for review and approval. CPUC mitigation monitor to monitor compliance.	At least 90 days prior to the start of construction. During all phases of the Proposed Project.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Aesthetics (cont.)				
Impact 5.1-6 (cont.)	• All lighting shall be of minimum necessary brightness consistent with worker safety. • High illumination areas not occupied on a continuous basis shall be illuminated only when occupied.			
Agriculture and Forestry Resources				
No mitigation required.				
Air Quality				
Air Quality and Fugitive Dust	**APM AQ-1: Air Quality Protection.** SCE has implemented, and would implement, a number of practices, including minimizing equipment idling time and maintaining equipment engines in good condition and in proper tune as per manufacturers' specifications, to reduce emissions. SCE's practices for the control of fugitive dust emissions, which were implemented during past construction activities and would be implemented during future construction activities, incorporate many of the recommended measures described in the Ventura County Air Pollution Control District's (VCAPCD) Model Fugitive Dust Mitigation Plan, which is reproduced verbatim below:[1] 1. The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust. 2. Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	During all phases of construction activities.

[1] This text is taken verbatim, including the parenthetical remark "(indicate by whom)", from the Ventura County Air Quality Control District's Ventura County Air Quality Assessment Guidelines.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality (cont.)				
Air Quality and Fugitive Dust **(cont.)**	3. Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities: a. All trucks shall be required to cover their loads as required by California Vehicle Code §23114. b. All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible. 4. Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.[2] 5. Signs shall be posted on-site limiting traffic to 15 miles per hour or less.[3] 6. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation			

[2] SCE did not/may not always undertake soil stabilization activities in areas that were/are inactive for more than four days due to prohibition of construction activities to protect nesting birds.
[3] SCE did/will not post speed limit signs along the access roads; the design of the roads are not conducive to travel above 15 mph by the types of vehicles used during past construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality (cont.)				
***Air Quality and Fugitive Dust* (cont.)**	operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive. 7. Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. 8. Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.			
Impact 5.3-1: Construction activities would generate exhaust emissions that could contribute substantially to a violation of an air quality standard**.**	**Mitigation Measure 5.3-1:** For diesel-fueled off-road construction equipment of more than 50 horsepower, SCE shall make a good faith effort to use available construction equipment that meets the highest USEPA-certified tiered emission standards. An Exhaust Emissions Control Plan shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the plan has been approved. Separate from the Exhaust Emissions Control Plan, an inventory of off-road diesel equipment over 50 hp that identifies each off-road unit's certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC prior to mobilization of that unit. For all pieces of equipment that would not meet Tier 3 emission standards, the inventory submittal shall include documentation from two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment.	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the Exhaust Emissions Control Plan to CPUC for review and approval. SCE shall submit off-road inventory to the CPUC for review and approval.	At least 30 days prior to commencement of construction activities. Prior to mobilization of that unit.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality (cont.)				
Impact 5.3-2: Construction activities would generate fugitive dust emissions that could contribute substantially to an existing or projected air quality violation.	**Mitigation Measure 5.3-2:** SCE shall reduce construction-related fugitive dust emissions by implementing the following VCAPCD dust control measures. SCE shall require all contractors to comply with the following requirements: 1. The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust. 2. Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities. 3. Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities: a. All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114. b. All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible. 4. Graded and/or excavated inactive areas of the construction site shall be monitored by SCE's mitigation monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over 4 days as long as there are no prohibitions of construction activities in	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality (cont.)				
Impact 5.3-2 (cont.)	the area to protect nesting birds. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust. 5. All traffic on dirt access roads shall be limited to a speed of 15 miles per hour or less. 6. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive. 7. Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. 8. Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.			
Impact 5.3-4: Construction activities would result in emissions of NO_x that would be cumulatively considerable.	Implement Mitigation Measures 5.3-1 (Construction Equipment NO_x Reductions) and 5.3-2 (Fugitive Dust Mitigation Plan).	See Mitigation Measures 5.3-1 and 5.3-2.	See Mitigation Measures 5.3-1 and 5.3-2.	See Mitigation Measures 5.3-1 and 5.3-2.
Cumulative Air Quality Impact: Construction activities would result in emissions of NO_x that would be cumulatively considerable.	Implement Mitigation Measures 5.3-1 (Construction Equipment NO_x Reductions) and 5.3-2 (Fugitive Dust Mitigation Plan).	See Mitigation Measures 5.3-1 and 5.3-2.	See Mitigation Measures 5.3-1 and 5.3-2.	See Mitigation Measures 5.3-1 and 5.3-2.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources				
Biological Resources: General	**APM BIO-1: General.** • Where wood subtransmission poles have been replaced with LWS poles during past construction activities, the previously-installed poles would be retrofitted to be avian-safe with newly available equipment and consistent with the *Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006* (Avian Power Line Interaction Committee, 2006). • During future construction activities, newly-installed LWS poles would be designed to be avian-safe with newly available equipment and consistent with the *Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006* (Avian Power Line Interaction Committee, 2006). • Clearance surveys, including avian species, will be conducted no more than 30 days prior to the start of construction in a particular area to identify potential plant and animal species that could be present during construction activities. Clearance surveys will be conducted by a qualified botanist and wildlife biologist and will be limited to areas directly impacted by construction activities. • A qualified biologist will be present during clearing and restoration activities to ensure that native habitat (coastal sage scrub) removal will be minimized. • Restoration activities in disturbed areas of native habitat (coastal sage scrub) will continue to be implemented in accordance the CDFW SAA and HRMP requirements, as applicable. • Implement Worker Environmental Awareness Training (See [PEA] Section 3.9.7). • Surveys for protected trees will be conducted by a certified arborist to identify trees meeting regulatory protection standards. When applicable, the proper permit will be obtained for trimming and/or removal of protected trees.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Special Status Plants	**APM BIO-2: Special Status Plants.** • Focused surveys for Lyon's pentachaeta and Conejo dudleya to be conducted no more than 30 days prior to start of construction in areas with potentially suitable habitat.[4] • Areas supporting Lyon's pentachaeta will be flagged prior to project activities by a qualified biologist and avoided during construction. In addition, a biological monitor will be present during project activities occurring within the vicinity of these resources to ensure that no sensitive species will be impacted.[5] • Areas supporting Conejo dudleya will be flagged prior to project activities by a qualified biologist and avoided during construction. In addition, a biological monitor will be present during project activities occurring within the vicinity of these resources to ensure that no sensitive species will be impacted.[6] • When digging holes for pole replacements within Lyon's pentachaeta critical habitat the upper six (6) inches of topsoil will be salvaged/stockpiled within Lyon's pentachaeta critical habitat in order to maintain the native seed bank. The topsoil will be stored on a protective surface (such as a tarp), piled no more than three feet high, and was replaced (within two weeks) as the top layer when ground disturbing work was completed.[7] • Where applicable, disturbed areas within Lyon's pentachaeta habitat will continue to be restored in accordance with the CDFW SAA and HRMP requirements.[8]	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

4 August 30, 2010 letter from SCE to Ms. Diane K. Noda, Field Supervisor, Ventura Fish and Wildlife Office in [PEA] Appendix F.
5 *Ibid*.
6 *Op cit.* 6
7 *Op cit.* 6
8 February 16, 2010 California Department of Fish and Wildlife Streambed Alteration Agreement for the Moorpark Newbury Park 66kV Line Area Notification #1600-2011 0325-R5 Revision 2; contained in [PEA] Appendix F.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Special Status Birds	**APM BIO-3: Special Status Birds.**[9] • Focused protocol surveys to be conducted prior to construction for the coastal California gnatcatcher (Polioptila californica californica). • During the breeding season (February 15 through August 30), a protocol survey for the coastal California gnatcatcher will be conducted prior to construction by a wildlife biologist possessing a valid recovery permit from the USFWS for the coastal California gnatcatcher. • If project activities occur during the breeding season (February 15 through August 30), a 500-foot buffer will be established around coastal California gnatcatcher nest sites, and this area will be avoided until the young fledged or until the birds abandoned the nest. • No grading of habitat occupied by nesting coastal California gnatcatchers (including a 500-foot buffer area in all direction from the nest) will occur during the breeding season (February 15 through August 30). • Project activities that will occur within 500 feet of a mapped coastal California gnatcatcher territory will be monitored by a qualified biologist who possesses a valid recovery permit for the species.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.
Nesting Bird Protection	**APM BIO-4: Nesting Bird Protection.** SCE will develop and implement a project-specific nesting bird management plan (the plan) addressing nesting birds in collaboration with the CDFW and USFWS as needed. The plan would be an adaptive management plan to be updated as needed improvements are identified or conditions in the field change. Conditions typically implemented in this plan would include: nest management and avoidance, field approach (survey methodology, reporting, and monitoring), and the Project avian biologist qualifications. The avian biologist would be responsible for oversight of the avian	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

9 *Op cit.* 6

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Nesting Bird Protection **(cont.)**	protection activities including the biological monitors. In order to minimize impacts to nesting birds (common or special status), ongoing preconstruction surveys and daily sweep surveys of active construction areas by a qualified biologist would focus on breeding behavior and a search for active nests, as defined by CDFW and USFWS, within 500 feet of the Project. At a minimum, the plan would include the following: • For vegetation clearing that needs to occur during the typical nesting bird season (February 1 to August 31; as early as January 1 for raptors) qualified biologists would conduct nesting bird surveys. If an active nest were located, the appropriate avoidance and minimization measures from the management plan would be implemented. If active nest removal is required, SCE would consult with CDFW and USFWS; • During the typical nesting bird season, SCE would conduct preconstruction clearance surveys no more than 14 days prior to construction and in accordance with the adaptive management plan, to determine the location of nesting birds and territories. Preconstruction sweeps would be conducted within 3 days before construction begins at a given project location; • Nest monitoring would be conducted by Project biological monitors with knowledge of bird behavior; • Nesting deterrents (e.g., mooring balls, netting, etc.) would be used for inactive nests at the direction of the Project avian biologist in consultation with CDFW and USFWS; • A Project avian biologist would determine the appropriate buffer area around active nest(s) and provisions for buffer exclusion areas (e.g., highways, public access roads, etc.) along with construction activity limits. The Project avian biologist would determine, evaluate, and modify buffers as appropriate based on species tolerance and behavior, the potential disruptiveness of construction activities, and surrounding conditions; and,			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
***Nesting Bird Protection* (cont.)**	• The Project biological monitor would ensure implementation of appropriate buffer areas around active nest(s) during project activities. The active nest site and applicable buffer would remain in place until nesting activity concluded. Nesting bird status reports would be submitted according to the management plan.			
Biological Resources Impacts	**APM WET-1: Worker Environmental Awareness Training.** Prior to the start of past construction activities, a Worker Environmental Awareness Plan (WEAP) was developed. A presentation was prepared by SCE and used to train site personnel prior to the commencement of work. A record of all trained personnel was kept. This process would be repeated prior to and during the future construction activities. The WEAP training included a list of phone numbers of SCE environmental specialist personnel associated with the Project (archaeologist, biologist, environmental compliance coordinator, and regional spill response coordinator), and covered the following topics: • Archaeological Resources Training - An Environmentally Sensitive Area (ESA) has been physically delineated and marked to protect an archaeological resource - All work and equipment staging, storing, and placement shall remain outside the ESA - The Project has implemented procedures to follow if unanticipated archaeological resources are discovered, including: ▪ If archaeological resources are discovered during construction activities, all work in the vicinity of the find shall halt ▪ The archaeological monitor shall be informed ▪ The archaeological monitor shall notify the project foreman and SCE archaeologist immediately	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Biological Resources Impacts **(cont.)**	▪ Archaeological monitors have the authority to temporarily halt work in the area of archaeological discoveries until the resource has been evaluated by a qualified archaeologist ▪ Work in the area of the discovery shall not resume until written notification is received from the SCE archaeologist - The SCE archaeologist will provide an estimate of how long an excavation of the resource would take - The Project has established procedures to follow if human remains are encountered. If human remains are encountered during earth-disturbing activities, State Health and Safety Code Section 7050.5 states that there "shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered [has made the appropriate assessment and] the recommendations concerning the treatment and disposition of the human remains has been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code." • Biological Resources Training. Workers were informed of general and Project-specific biological impact reduction measures, including: - Keep vehicles on existing roads and pads - Avoid impacts to drainages - Minimize clearing of vegetation - Avoid trapping animals by covering trenches/holes at the end of each day - Workers informed of requirements and actions under Migratory Bird Treaty Act			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Biological Resources Impacts **(cont.)**	- Workers informed of protected plant and wildlife species that may be found in the Project Area, where they have been identified during past surveys, and protection measures that may be implemented • SWPPP Training - Background on the regulatory climate - Education on individual and corporate responsibilities under the Clean Water Act - Presentation of activities covered under the Construction General Permit, and requirements of the Construction General Permit - Develop and implement a SWPPP - Eliminate or control non-stormwater - Visual inspections - Identification of SWPPP requirements - Daily inspection checklist - Maps - BMPs - Presentation on spill prevention and control, and spill notification procedures - Identification of common stormwater violations - Education on how to identify problems and devise solutions - Instruction on the importance of maintaining the construction site. All trash must be removed from the job sites daily, and all construction debris shall be removed at the end of construction - Instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
***Biological Resources Impacts* (cont.)**	- Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the Project			
Impact 5.4-1: Construction activities could result in adverse impacts to rare plants.	**Mitigation Measure 5.4-1a:** SCE and/or its contractors shall perform preconstruction surveys for rare plants in areas of future ground disturbance. If no rare plants are encountered, no further mitigation is required. If rare plants are known to occur or new populations are found, the applicant proposed measures related to special-status plants shall be implemented for any identified CRPR Rank 1 or Rank 2 species. **Mitigation Measure 5.4-1b:** To reduce the potential for introduction or spread of invasive weeds in sensitive habitats during ground-disturbing activities, SCE shall prepare and implement a Weed Control Plan. The Weed Control Plan shall address the following: 1) A pre-construction weed inventory to be conducted by surveying all areas subject to ground-disturbing activity, including, but not limited to, pole installation sites and construction areas, tower removal sites, pulling and tensioning sites, guard structures, and areas subject to grading for new or improved access and spur roads. 2) During construction of the Project, implement measures to control the introduction and spread of noxious weeds in the Project work area. These shall include: a. washing vehicles (including wheels, undercarriages, and bumpers) at existing construction yards, commercial car washes, or similar suitable sites prior to commencing work in off-road areas; b. washing tools such as chainsaws, hand clippers, pruners, etc., prior to use in off-road areas;	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance. A Weed Control Plan will be submitted to the CPUC for approval.	During all phases of construction activities. Prior to commencement of ground disturbance activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Impact 5.4-1 (cont.)	c. ensuring that all seeds and erosion-control materials used in off-road areas are weed-free, and any imported gravel or fill material are certified weed free by the county Agriculture Commissioners' Offices before use; and d. during Proposed Project operation and maintenance activities that require clearing invasive weeds from helicopter landing areas, assembly and laydown areas, spur and access roads, staging areas, and other weed-infested areas; SCE will dispose of weeds in appropriate off-site locations.			
Impact 5.4-2: Construction activities could result in adverse impacts to special-status reptiles.	**Mitigation Measure 5.4-2:** Within areas that provide potentially suitable habitat for special-status reptiles, SCE and/or its contractors shall perform preconstruction surveys within 24 hours of initial ground disturbance to identify the potential presence of western pond turtle, coast horned lizard, silvery legless lizard, two-striped garter snake, and South Coast garter snake within work areas. If any of these species are identified during surveys of the immediate construction area footprint, individuals shall be relocated to nearby suitable habitat by an individual who is authorized by CDFW to undertake species relocation.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	Within 24 hours of initial ground disturbance activities.
Impact 5.4-5: Construction could impact native grassland and sage scrub vegetation communities.	**Mitigation Measure 5.4-5:** SCE will develop a revegetation plan to restore temporarily impacted native habitats consistent with the prescriptions identified in the 2012 revegetation plan prepared by Wildscape Restoration for the Proposed Project, included as PEA Appendix F5, Habitat Restoration and Monitoring Plan. The 2012 revegetation plan, which was subject to CDFW review and approval, proposes the use of native revegetation for temporary impacts created by the Proposed Project. Implementation of the plan in disturbed areas will ensure that the functions and values of the disturbed habitat are restored by protecting and restoring soil conditions, restoring topography and topsoil following construction, using local native plants, and controlling aggressive non-native plant species.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During revegetation activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources				
Cultural and Paleontological Resources	**APM CUL-1: Cultural and Paleontological Resources.** A cultural resources survey of the Project area was conducted prior to past construction activities. Additionally, a number of physical protection and impact avoidance measures were implemented prior to, and during, past construction activities. These activities would also be implemented prior to, and during, future construction activities: • Physically isolate within an Environmentally Sensitive Area (ESA) one cultural resource discovered during previous surveys. The ESA is an area in which construction activities are prohibited, and from which construction workers are excluded. • Utilize an archaeological monitor on site during ground disturbing activity in the vicinity of identified archaeological resources. • Conduct a preconstruction meeting to orient construction crews to sensitive areas prior to any ground disturbing activity within the vicinity of identified archaeological resources. • Should cultural material that may yield sensitive information be uncovered during construction, then all work within a 15-meter radius of the discovery will be halted until the find is evaluated by a qualified archaeologist. In the case of unearthing human remains during excavation, no further disturbance occurs until the County Coroner makes the necessary findings as to origin and distribution, pursuant to Public Resources Code Section 5097.98. (No cultural material or human remains were uncovered during past construction activities.) • If construction is halted because of an archaeological discovery, no work begins within that area until written notification from a qualified archaeologist is given to the Project Manager or construction foreman.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Unanticipated Cultural Discoveries	**APM CUL-2: Unanticipated Discoveries.** If previously unidentified cultural resources are discovered during construction, personnel would suspend work in the vicinity of the find. The resource would then be evaluated for listing in the California Register of Historical Resources (CRHR) by a qualified archaeologist, and, if the resource is determined to be eligible for listing in the CRHR, the resource would either be avoided or appropriate archaeological protective measures would be implemented. If human skeletal remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work in the immediate area, contact the applicable County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. Per Health and Safety Code Section 7050.5, upon the discovery of human remains, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. If the applicable County Coroner determines that the remains are Native American, it is anticipated that the coroner would contact the Native American Heritage Commission in accordance with Health and Safety Code Section 7050.5(c) and Public Resources Code Section 5097.98 (as amended by AB 2641). In addition, SCE shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity until SCE has discussed and conferred, as prescribed in Public Resource Code Section 5097.98, with the most likely descendants regarding their recommendations.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.
Cultural Resources Impacts	**Implement APM WET-1**: Worker Environmental Awareness Training.	See APM WET-1.	See APM WET-1.	See APM WET-1.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Paleontological Resources Protection	**APM CUL-3: Paleontological Resources Protection.** To protect paleontological resources, SCE would implement procedures including, but not limited to: preconstruction coordination; recommended monitoring methods; emergency discovery procedures; sampling and data recovery methods, if needed; museum storage coordination for any specimens and data recovered; and reporting requirements.	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.
Impact 5.5-1: Construction activities and operation could cause an adverse change in the significance of a historical resource [inclusive of archaeological resources] which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic resources	**Mitigation Measure 5.5-1a**: SCE and/or its contractors shall retain a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2014), to carry out all mitigation measures related to archaeological resources. **Mitigation Measure 5.5-1b:** Prior to the commencement of construction activities and in coordination with the qualified archaeologist, the construction zone shall be narrowed or otherwise altered to avoid impacts to resource P-56-001797. In coordination with the qualified archaeologist, avoidance shall be ensured by the delineation of an Environmentally Sensitive Area around the site. Protective fencing or other markers shall be erected around the Environmentally Sensitive Area prior to any ground disturbing activities; however, the Environmentally Sensitive Area shall not be identified specifically as an archaeological site, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts. If avoidance of site P-56-001797 is demonstrated to be infeasible, prior to the start of construction in the vicinity of site P-56-001797, a detailed Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist. The Cultural Resources Treatment Plan shall include a research design and a scope of work for data recovery of the portion(s) of the resource to be impacted by construction activities. Treatment may consist of (but would not be limited to): a sufficient avoidance buffer to protect the resource until data recovery and/or removal is completed; sample excavation; surface artifact	SCE and its contractors to implement measure as defined.	SCE to submit resume of qualified archaeologist to CPUC. CPUC mitigation monitor to inspect compliance. Submit Cultural Resources Treatment Plan shall be submitted to the CPUC for approval.	Prior to commencement of construction activities. During all phases of construction activities. Prior to the commencement of construction.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Impact 5.5-1 (cont.)	collection; site documentation; and historical research, with the aim to target the recovery of important scientific data contained in the portion of the significant resource to be impacted. The Cultural Resources Treatment Plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, and curation of artifacts and data at an approved facility. The reports documenting the implementation of the Cultural Resources Treatment Plan shall be submitted to and approved by the CPUC prior to the commencement of construction activities, and shall also be submitted to the South Central Coastal Information Center.			
	Prior to the commencement of the operation and maintenance phase, the qualified archaeologist, in coordination with SCE, shall develop a long-term cultural resources management plan for archaeological site P-56-001797 in order to minimize future impacts during project operation and maintenance.		SCE shall develop a long-term cultural resources management plan for archaeological site P-56-001797.	Prior to the commencement of the operation and maintenance phase.
	Mitigation Measure 5.5-1c: Prior to commencement of construction activities, an archaeological monitor shall be retained by SCE and/or its contractors to monitor all ground-disturbing activities, including grading, excavation, vegetation clearance and grubbing, within 50 feet of archaeological site P-56-001797. The monitor shall be, or shall work under the supervision of, a qualified archaeologist. In the event that cultural resources are unearthed during ground-disturbing activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Evaluation of resources shall follow the procedures set forth in Mitigation Measure 5.5-1d.		Archaeological monitor shall be retained by SCE and/or its contractors to monitor all ground-disturbing activities, including grading, excavation, vegetation clearance and grubbing, within 50 feet of archaeological site P-56-001797.	Prior to commencement of construction activities.
	Mitigation Measure 5.5-1d: If archaeological resources are encountered during construction, SCE and/or its contractors shall cease all activity within 100 feet of the find until the find can be evaluated by a qualified archaeologist. Per California Environmental Quality Act Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to		Qualified archaeologist shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources (if encountered).	During all construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Impact 5.5-1 (cont.)	avoid impacts to significant historical resources. Consistent with California Environmental Quality Act Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the CPUC, which may include data recovery or other appropriate measures. The qualified archaeologist shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curational facility. Work may proceed on other parts of the alignment while treatment is being carried out. The qualified archaeologist shall prepare a report documenting evaluation and/or additional treatment of the resource, which shall be submitted to the CPUC and South Central Coastal Information Center.			
Impact 5.5-2: Construction activities could adversely impact a unique archaeological resource.	Implement Mitigation Measures 5.5-1c and 5.5-1d.	See Mitigation Measures 5.5-1c and 5.5-1d.	See Mitigation Measures 5.5-1c and 5.5-1d.	See Mitigation Measures 5.5-1c and 5.5-1d.
Impact 5.5-3: Excavation could directly or indirectly destroy a unique paleontological resource.	**Mitigation Measure 5.5-3:** SCE will hire a qualified paleontologist, as defined by Society of Vertebrate Paleontology guidelines, to monitor excavation activities located in Quaternary alluvium. If the monitor or construction crews discover fossils or fossil-like material during excavation and earth-moving operations, all earthwork and other types of ground disturbance within 50 feet of the find shall stop immediately until the qualified paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and activities occurring on the site.	SCE and its contractors to implement measure as defined.	SCE to submit resume of paleontologist and copy of paleontological assessment to CPUC. CPUC mitigation monitor to inspect compliance.	Prior to commencement of and during construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Impact 5.5-3 (cont.)	If treatment and salvage is required, recommendations will be consistent with Society of Vertebrate Paleontology guidelines (SVP, 1995) and currently accepted scientific practice. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report describing the finds. SCE and/or its contractor will be responsible for ensuring that treatment is implemented. If no report is required, SCE and/or its contractor will nonetheless ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.			
Energy Conservation				
No mitigation required.				
Geology and Soils				
Geotechnical Design Considerations	**APM GEO-1: Geotechnical Design Considerations.** A geotechnical data report was prepared for the Project prior to the beginning of construction. The investigation included a total of fourteen (14) soil and rock core borings to collect samples for laboratory testing and analyses and to evaluate the subsurface soil and bedrock conditions. The results of the investigation were utilized to identify the geologic setting and engineering properties of soil and bedrock underlying the ROW, as well as to provide recommendations for the design of foundations for the subtransmission line structures. A geotechnical investigation for the installation of TSPs at the Newbury Substation property would be performed prior to future construction activities at this location. Based on the findings of the past and future geotechnical analyses, SCE did and would design Project components to minimize the potential for impacts from landslides, lateral spreading, subsidence, liquefaction, or collapse. Measures that have been, or may be, used to minimize	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Geology and Soils (cont.)				
Geotechnical Design Considerations (cont.)	impacts could include, but are not limited to avoidance of highly unstable areas and construction of pile foundations. Additionally, subtransmission poles are designed consistent with CPUC General Order 95, *Rules for Overhead Line Construction*.			
Impact 5.7-5: Construction, operation, and maintenance of the Proposed Project could result in erosion or the loss of topsoil.	Implement Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.
Greenhouse Gas Emissions				
No mitigation required.				
Hazards and Hazardous Materials				
Hazardous Materials Impacts	**Implement APM WET-1**: Worker Environmental Awareness Training.	See APM WET-1.	See APM WET-1.	See APM WET-1.
Impact 5.9-1: Construction would require the use of hazardous materials that could pose a potential hazard to the public or the environment if improperly used or inadvertently released.	**Mitigation Measure 5.9-1a:** SCE and/or its contractors shall implement construction best management practices including but not limited to the following: • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction; • Avoid overtopping construction equipment fuel gas tanks; • Use tarps and adsorbent pads under construction equipment and vehicles when refueling to contain and capture any spilled fuel; • During routine maintenance of construction equipment, properly contain and remove grease and oils; and • Properly dispose of discarded containers of fuels and other chemicals.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance. SCE to submit the following plans to the CPUC for approval: Hazardous Substance Control and Emergency Response Plan (Plan); Health and Safety Plan; Workers Environmental Awareness Plan.	During all construction activities. Prior to commencement of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials (cont.)				
Impact 5.9-1 (cont.)	**Mitigation Measure 5.9-1b:** SCE shall prepare a Hazardous Substance Control and Emergency Response Plan (Plan) and implement it during construction to ensure compliance with all applicable federal, state, and local laws and guidelines regarding the handling of hazardous materials. The Plan shall prescribe hazardous material handling procedures to reduce the potential for a spill during construction, or exposure of the workers or public to hazardous materials. The Plan shall also include a discussion of appropriate response actions in the event that hazardous materials are released or encountered during excavation activities. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. **Mitigation Measure 5.9-1c:** SCE shall prepare and implement a Health and Safety Plan to ensure the health and safety of construction workers and the public during construction. The plan shall include information on the appropriate personal protective equipment to be used during construction. **Mitigation Measure 5.9-1d:** SCE shall ensure that oil-absorbent material, tarps, and storage drums shall be used to contain and control any minor releases. Emergency spill supplies and equipment shall be kept at the project staging area and adjacent to all areas of work, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Substance Control and Emergency Response Plan (see Mitigation Measure 5.9-1b), which shall be implemented during construction. **Mitigation Measure 5.9-1e:** SCE shall ensure that the Workers Environmental Awareness Plan includes training on site-specific physical conditions to improve hazard materials release prevention and include a review of the Health and Safety Plan and the Hazardous Substance Control and Emergency Response Plan. The CPUC mitigation monitor shall attend the first program. SCE shall submit documentation to the CPUC prior to the commencement of construction activities that each worker on the project has undergone this training program.			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials (cont.)				
Impact 5.9-3: Construction activities could release previously unidentified hazardous materials in the environment.	**Mitigation Measure 5.9-3:** SCE's Hazardous Substance Control and Emergency Response Plan (Mitigation Measure 5.9-1b) shall include provisions that would be implemented if any subsurface hazardous materials are encountered during construction. Provisions outlined in the plan shall include immediately stopping work in the contaminated area and contacting appropriate resource agencies, including the CPUC designated monitor, upon discovery of subsurface hazardous materials. The plan shall include the phone numbers of county and state agencies and primary, secondary, and final cleanup procedures. The Hazardous Substance Control and Emergency Response Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.	SCE and its contractors to implement measure as defined.	SCE to submit Hazardous Substance Control and Emergency Response Plan to CPUC for review and approval. CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities. During all construction activities
Impact 5.9-5: The Proposed Project could result in a safety hazard for people working in the Proposed Project area because a nearby private helipad.	**Mitigation Measure 5.9-5:** In the event that the Federal Aviation Administration (FAA) provides SCE with recommendations other than those identified in the EIR Project Description, SCE shall implement the recommendations to the extent feasible. If SCE determines that the recommendation is not feasible, SCE must attempt to consult with FAA to identify how the intent of the recommendation, in terms of aviation safety, can be achieved in a feasible manner. If SCE and FAA cannot agree on the aviation safety measures for the project, SCE shall submit to the CPUC a detailed report identifying the specific reasons why it has determined that the recommendations are not feasible. The report shall include documentation of SCE's correspondences with FAA and offer solutions to achieve the aviation safety intent of the FAA recommendations. The report shall be submitted to the CPUC for review and approval at least 90 days prior to installation of any conductor.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance.	Prior to installation of conductor.
Impact 5.9-7: Construction-related activities could ignite dry vegetation and start a fire.	**Mitigation Measure 5.9-7:** SCE and/or its contractors shall prepare and implement a Fire Safety Plan to ensure the health and safety of construction workers and the public. The Ventura County Fire Department (VCFD) shall be consulted during plan preparation and include fire safety	SCE and its contractors to implement measure as defined.	SCE to submit Fire Safety Plan to CPUC for review and approval. CPUC mitigation monitor to inspect compliance.	Prior to construction activities. During all construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials (cont.)				
Impact 5.9-7 (cont.)	measures recommended by this agency. The plan shall list fire prevention procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations. The plan shall include, but not be limited to, the following: • SCE and/or its contractors shall have water tanks and/or water trucks sited/available in the Proposed Project area for fire protection. • All construction vehicles shall have fire suppression equipment. • All construction workers shall receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire. • As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires. • Construction personnel shall be required to park vehicles away from dry vegetation. • Prior to construction, SCE shall contact and coordinate with the VCFD to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks if water trucks are not used. SCE shall submit verification of its consultation with CalFire and the local fire department to the CPUC. • The plan shall be submitted to CPUC staff for approval prior to commencement of construction activities and shall be distributed to all construction crew members prior to construction of the Proposed Project			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hydrology and Water Quality				
Impact 5.10-1: Construction, operation, and maintenance activities could result in increased erosion and sedimentation and/or pollutant (e.g., fuels and lubricants) loading to surface waters, which could increase turbidity, suspended solids, settleable solids, or otherwise degrade water quality.	**Mitigation Measure 5.10-1:** For all improved or rehabilitated access roads that would be within 300 feet of an existing surface water channel (i.e., one that has a distinct bed and banks, including irrigation ditches where no berm/levee is currently in place) and traverse a ground slope greater than two percent, the following protective measures shall be adhered to and/or installed: • All improved or rehabilitated access roads shall match the existing in-sloped or out-sloped construction; • Cross-drains (road surface drainage, e.g., waterbars, rolling dips, or channel drains) and energy dissipation features (e.g., rock rip-rap, rock-filled containers) shall be installed at intervals based upon the finished road slope: road slope 5 percent or less, cross-drain spacing shall be 150 feet; road slope 6 to 15 percent, cross-drain spacing shall be 100 feet; 16 to 20 percent, cross-drain spacing shall be 75 feet; and 21 to 25 percent, cross-drain spacing shall be 50 feet.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During construction and rehabilitation activities.
Impact 5.10-2: Dewatering during construction activities could release previously contaminated groundwater to surface water bodies and/or increase sediment loading to local surface water channels through overland discharge and subsequent erosion, degrading water quality in receiving surface waters	**Mitigation Measure 5.10-2:** Regarding dewatering activities and discharges, the following measures shall be implemented as part of Proposed Project construction: • If degraded soil or groundwater is encountered during excavation (e.g., there is an obvious sheen, odor, or unnatural color to the soil or groundwater), SCE and/or its contractor shall excavate, segregate, test, and dispose of degraded soil or groundwater in accordance with state hazardous waste disposal requirements. • All dewatering activities shall, where feasible, discharge to the land surface in the vicinity of the particular installation or construction site. The discharges shall be contained, such that the water is allowed to infiltrate back into the soil, and eventually to the groundwater table, and the potential for inducing erosion and subsequent sediment delivery to nearby surface waterways is eliminated. Further, the holding tank or structure shall be protected from the introduction of pollutants including but not limited to oil or fuel	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During dewatering activities. Prior to the commencement of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hydrology and Water Quality (cont.)				
Impact 5.10-2 (cont.)	contamination from nearby equipment. Concerning such activities, SCE shall apply and comply with the provisions of SWRCB Order 2003-0003-DWQ, including development and submittal of a discharge monitoring plan. • If discharging to a community sewer system is feasible or necessary, SCE shall discharge to a community sewer system that flows to a wastewater treatment plant. Prior to discharging, SCE shall inform the responsible organization or municipality and present them with a description of and plan for the anticipated discharge. SCE shall comply with any specific requirements that the responsible organization or municipality may have. If discharging to surface waters, including to storm drains, would be necessary, SCE shall obtain and comply with the provisions of the LARWQCB Dewatering General Permit. SCE shall perform a reasonable analysis using a representative sample(s) of the groundwater to be discharged; this shall include analyzing the sample(s) for the constituents listed in the LARWQCB Dewatering General Permit, including TDS and nitrate. Further, the sample(s) shall be compared to the screening criteria listed in the LARWQCB Dewatering General Permit and the Basin Plan, and it shall be demonstrated that the discharge would not exceed any of the applicable water quality criteria or objectives. If necessary, SCE shall develop and submit to the LARWQCB a treatment plan and design. SCE shall provide to the CPUC proof of compliance with LARWQCB plans and permits prior to the commencement of construction activities.			
Impact 5.10-3: Construction activities could impact local drainage patterns, or the course of a given stream, resulting in substantial on- or off-site erosion or sedimentation.	Implement Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.	See Mitigation Measure 5.10-1.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Land Use				
No mitigation required.				
Mineral Resources				
No mitigation required.				
Noise				
Excessive Noise	**APM NOI-1: Noise Reduction.** Noise-generating construction activities were, and would be, conducted generally only during daytime hours (7:00 a.m. to 7:00 p.m.), Monday through Saturday. Construction activities were, and would be, conducted or staggered to ensure that the noise generated during construction would not exceed significance thresholds or durations identified by the County of Ventura noise regulations set forth in the County's Construction Noise Threshold Criteria and Control Plan (2010).	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	During all phases of construction activities.
Impact 5.13-1: Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.	**Mitigation Measure 5.13-1a:** SCE and/or its contractors shall develop a Construction Noise Reduction Plan. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The Plan shall include, but not be limited to, the following measures for daytime construction activities: • Distribute to the potentially affected community within 650 feet of the Stringing Site north-northeast of Hitch Boulevard and Ventavo Road, and the residence near the Helicopter Land Zone in unincorporated Ventura County, a "hotline" telephone number, which shall be attended during active construction working hours, for use by the public to register complaints. All complaints shall be logged noting date, time, complainants' name, nature of complaint, and any corrective action taken. • All construction equipment shall have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations. Maintain maximize physical separation, as far as practicable, between noise sources (construction equipment) and noise receptors. Separation may be	SCE and its contractors to implement measures as defined.	SCE to submit Construction Noise Reduction Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance. SCE to submit a Nighttime Noise and Nuisance Reduction Strategy plan to CPUC (if necessary).	Prior to commencement of construction activities. During all phases of construction activities. Prior to the commencement of construction activities

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)				
Impact 5.13-1 (cont.)	achieved by providing enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the construction sites, and by locating stationary equipment to minimize noise impacts on the community. Use construction noise barriers such as paneled noise shields, barriers, or enclosures adjacent to or around noisy equipment associated with conductor stringing north-northeast of Hitch Boulevard and Ventavo Road. Noise control shields shall be made featuring a solid panel and a weather-protected, sound-absorptive material on the construction-activity side of the noise shield. **Mitigation Measure 5.13-1b:** SCE and/or its contractors shall develop a Nighttime Noise and Nuisance Reduction Strategy plan in the event that nighttime construction activity is determined to be necessary within 1,000 feet of sensitive receptors. The plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The strategy shall include a set of site-specific noise attenuation measures that apply state-of-the-art noise reduction technology to ensure that nighttime construction noise levels and associated nuisances are reduced to the extent feasible. The attenuation measures may include, but not be limited to, the control strategies and methods for implementation that are listed below. If any of the following strategies are determined by SCE to not be feasible, an explanation as to why the specific strategy is not feasible shall be included in the plan. • Plan construction activities to minimize the amount of nighttime construction. • Offer temporary relocation of residents within 200 feet of nighttime construction activities. • Temporary noise barriers, such as shields and blankets, shall be installed immediately adjacent to all nighttime stationary noise sources (e.g., auger rigs, generators, compressors, etc.).			

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)				
Impact 5.13-1 (cont.)	• Install temporary noise barriers that block the line of sight between nighttime activities and the closest residences within 1,000 feet. The notification requirements identified in Mitigation Measure 5.13-1a shall be extended to include residences within 1,000 feet of pending nighttime construction activities.			
Impact 5.13-3: Construction-related nighttime noise levels would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.	Implement Mitigation Measure 5.13-1b.	See Mitigation Measure 5.13-1b.	See Mitigation Measure 5.13-1b.	See Mitigation Measure 5.13-1b.
Population and Housing				
No mitigation required.				
Public Services				
No mitigation required.				
Recreation				
No mitigation required.				
Transportation and Traffic				
Traffic Impacts	**APM TRA-1: Traffic Control.** Construction activities completed within public street ROWs may require the use of a traffic control service, and lane closures conducted in accordance with local ordinances and city permit conditions. Traffic control measures used are consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee, 2010) or local jurisdictional requirements. As discussed in Section 4.16, during the past activities, traffic control measures were not needed due to the location and type of work conducted. During future	SCE and its contractors to implement measures as defined.	CPUC mitigation monitor to inspect compliance.	Prior to commencement of construction activities, and during all phases of construction activities.

TABLE F-1 (Continued)
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT

Environmental Impact	Applicant Proposed Measures and Mitigation Measures Identified in the EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation and Traffic (cont.)				
Traffic Impacts (cont.)	construction activities, SCE would implement recommendations contained in the CJUTCM, including consulting and coordinating with local jurisdictions, to ensure the safe and efficient transit of vehicles, bicyclists, and pedestrians through laydown/work areas.			
Impact 5.17-6: Alternative modes of transportation (public transit, bicycle or pedestrian) could be adversely affected	Implement Mitigation Measures 5.1-2a and 5.1-52b.	See Mitigation Measures 5.1-2a and 5.1-52b.	See Mitigation Measures 5.1-2a and 5.1-52b.	See Mitigation Measures 5.1-2a and 5.1-52b.
Utilities and Service Systems				
No mitigation required.				

APPENDIX G

Memorandum on Late Comments on the Draft EIR

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ESA Energy

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memorandum

date October 26, 2015

to Michael Rosauer, CPUC Project Manager
Jack Mulligan, CPUC Staff Council

from Matt Fagundes, Project Manager
Paul Scheuerman, Project Transmission Engineer

subject Moorpark-Newbury 66 kV Subtransmission Line Project – Late Comments on the Draft EIR

The 45-day comment period for the Moorpark-Newbury Project Draft EIR concluded on July 27, 2015. Comments that were received within a few days of the end of the comment period were accepted and are included in the Final EIR. Additional comment letters were received from Peggy Ludington or Alan and Peggy Ludington on September 2, 9, and 24, and October 12, 16, and 18, 2015. In order to publish the Final EIR on a reasonable schedule, these comments were not included in the Final EIR, but were evaluated by the Energy Division and its consultants to determine whether the late comments identify new issues that would change any of the EIR findings. This memorandum documents that evaluation.

Comments Received September 2, 2015

The comments suggest that the SCE power flow projections should be based on emergency equipment, the emergency line rating, and "likely" case growth. These comments have been addressed. Refer to Responses I50-5 and I50-13.

Comments Received September 9, 2015

This comment set included Ludington's 11th and 12th Data Requests to SCE as well as a comment letter on the Draft EIR. The comment letter identifies six new alternatives. Where the alternative or issue is not addressed in the Final EIR, an assessment of the alternatives relative to the screening criteria identified in the Draft EIR is provided below. The comment letter also includes a request that all SCE projections be based on (1) emergency equipment and emergency line rating and (2) what was previously termed "likely case." This comment has been addressed. Refer to Responses I50-5 and I50-13.

1. "Operational Excellence" methodology that aligns distribution circuits to meet load growth needs

SCE began implementing this methodology in 2012, and in its testimony provided with the comment letter, SCE states that the program has "transformed our load growth planning methods …" and "This resulted in fewer major

load growth projects and more miscellaneous work on distribution circuits," which indicates that SCE is already accounting for this program in its latest 10-year projections.

SCE has reported that the amount of electrical demand in 2015 that would be required to be shifted from Newbury Substation to satisfy the voltage violations at Newbury and Pharmacy Substations during an unplanned N-1 of the Moorpark-Newbury-Pharmacy 66 kV Line (under peak conditions and upon re-energizing Pharmacy Substation) would be approximately 1,530 amps or 45 MVA; this is nearly half of the electrical demand served by Newbury Substation (SCE, 2015a). The feasibility and logistics required to transfer this amount of electrical load away from Newbury Substation is unknown; however, the 2015 voltage was approximately 0.96 per unit or 96 percent of the nominal voltage, which SCE considers to be only marginally acceptable (SCE, 2015a). This means that the forecasted additional demand in the future would also have to be transferred away because it could cause the voltage to fall below 0.95 per unit or drop greater than 5 percent during N-1 conditions.

SCE has also reported that there is insufficient reserve capacity at Thousand Oaks and Potrero Substations to support the amount of electrical demand that would need to be transferred from Newbury Substation. The electrical demand in 2015 that would be required to be shifted from Newbury Substation is 45 MVA in 2015 and is projected to increase to approximately 55 MVA in 2024. In 2015, the combined available capacity of Thousand Oaks and Potrero substations is approximately 50 MVA and it decreases to approximately 40 MVA in 2024 (SCE, 2015a). This alternative is not considered to be feasible because the demand to be transferred from Newbury Substation would be more than the available capacity at Thousand Oaks and Potrero substations.

2. Addition of a second circuit on the Newbury to Thousand Oaks line and the re-conductoring Alternative 2

This alternative scenario would rely on serving the Newbury and Pharmacy loads from Thousand Oaks substation. Loss of the Moorpark-Newbury-Pharmacy line would result in the entire load at the Newbury and Pharmacy substations to be transferred to Thousand Oaks Substation. This could increase the potential to overload the existing Moorpark to Thousand Oaks lines. In addition, all of the load being served from Thousand Oaks Substation could result in low voltage issues at Thousand Oaks.

There is currently not enough information available to determine the extent that this alternative would satisfy the CEQA objectives for the Proposed Project. However, the scope of construction activities that would be required for this alternative relative to that associated with the Proposed Project do not make it a viable alternative (see below). In addition, many of the existing poles along the Newbury to Thousand Oaks line already support two circuits (e.g., along S. Reino Road in the vicinity of Lynn Road, along Potrero Road east of S. Wendy Drive, and along Hodencamp Road, north of U.S. 101); therefore, this alternative would require installation of poles designed to support three circuits, which may not be feasible in some locations with narrow rights-of-way.

Adding a new circuit to the Newbury-Thousand Oaks line as well as re-conductoring the existing circuit of that line to a larger conductor would likely require replacement of the approximately 250 existing poles with new light-weight steel (LWS) poles. Compared to the Proposed Project, which would require installation of 24 new poles, this alternative would be anticipated to result in greater air quality impacts. In addition, this alternative would be developed in rural and dense residential areas, within the City of Thousand Oaks and unincorporated Ventura County, which could result in significant construction-noise impacts to a substantially greater amount of sensitive receptors compared to the Proposed Project. Therefore, implementation of this alternative would not avoid or reduce the air quality and noise significant impacts that would occur under the Proposed Project. This alternative would also result

in greater adverse traffic-related impacts during construction along S. Reino Road, W. Potrero Road, Hodencamp Road, and U.S. 101 (associated with two overhead crossings) compared to the Proposed Project. This alternative is not considered to be a viable alternative because it would result in greater impacts then the Proposed Project.

3. Creation of a demand response agreement and infrastructure to allow extended run time for Amgen's back-up generation

This alternative scenario has been addressed in the Final EIR. See Response I50-22 for discussion of an alternative that would require back-up generators to be operated in a manner that would require Pharmacy Substation to stay off-line during an N-1 situation.

4. Same approach as #3 only with other third-party large back-up generations

This is addressed in the Final EIR. See Final EIR Response I50-22.

5. Connection of Pharmacy Substation directly to: (1) the Moorpark to Newbury segment, or (2) the Newbury to Thousand Oaks segment, or (3) the Camgen to Newbury segment

An alternative that would connect Pharmacy Substation directly to one of three other 66 kV line segments would not be feasible because there is not sufficient available space at the Pharmacy Substation property to accommodate a second 66 kV line (SCE, 2015a).

In addition, an alternative that would connect Pharmacy Substation directly to the Moorpark to Newbury line would not provide any difference in reliability or the projected overload of the Moorpark to Newbury segment compared to existing conditions. In fact, this is the existing configuration of the Moorpark-Newbury-Pharmacy line. Similarly, connecting Pharmacy Substation directly to the Newbury to Thousand Oaks line would not address the projected base case overload: under normal conditions, the preferred path of power to Pharmacy Substation would continue to be from the Moorpark-Newbury-Pharmacy line because it is shorter than the path that would deliver power to Pharmacy from Moorpark Substation by way of Thousand Oaks Substation. This results in more electrical impedance, which is the extent to which the circuit opposes the flow of electricity (SCE, 2015a). In an unplanned N-1 outage of the Moorpark-Newbury-Pharmacy 66 kV Line under this scenario, Pharmacy Substation would remain energized by the proposed new 66 kV line that would connect to Thousand Oaks and Newbury Substation would remain energized by the existing Newbury to Thousand Oaks line. Because a voltage violation at Newbury Substation would occur whenever the amount of electrical demand served on the Newbury to Thousand Oaks line is greater than approximately 80 MVA and the 2015 projected demand at Newbury is 92 MVA (SCE, 2015a), this would not be a viable alternative.

6. Inclusion of specific preferred resources for solar photovoltaic (PV), demand response, and energy efficiency

This is addressed in Final EIR Section 3.1.1, *Master Response 1: Alternatives*. Refer to the *Renewable and Distributed Energy Generation Resources Alternative* discussion in Final EIR Master Response 1B.

Comments Received September 24, 2015

The commenter requests that the CPUC ask SCE for information to confirm that California State University of Channel Islands (CSUCI) seeks to renew its Power Purchase Agreement with SCE. However, that confirmation would not change the outcome of the Draft EIR alternatives screening analysis for Alternative 4, Reconnect the

Camgen Generator to the Moorpark System. As discussed in the Draft EIR (see Section 4.5.4.2, *Rationale for Elimination*), Alternative 4 was eliminated from full consideration in the EIR because even if a successful Power Purchase Agreement is achieved, this alternative would not address the forecasted N-1 violation on the Moorpark System.

The commenter also identified three new scenarios for variations to Alternative 4. In general, each of the identified scenarios would rely on serving the Newbury and Pharmacy loads from Thousand Oaks Substation and the Camgen facility. These are addressed below.

Alternative 4 Variant – Addition of a Second Circuit on Newbury to Thousand Oaks

This alternative is the same as Draft EIR Alternative 4 (Reconnect the Camgen Generator to the Moorpark System), except that instead of taping into the existing Newbury to Thousand Oaks line, a new line (i.e., Camgen to Newbury) would be created by adding an additional circuit to the western north-south aligned segment of the Newbury to Thousand Oaks line.

Given that the majority of the electrical load at Newbury Substation would be met via energy flowing from Thousand Oaks Substation during loss of the Moorpark Newbury line (approximately 82 percent in 2015), which would increase in future years with load growth under this alternative given that the Camgen contribution would be fixed and would not grow, the majority of the voltage decay would occur over the Camgen to Thousand Oaks portion of the system, which would continue to result in voltage violations at Newbury Substation during 10-year planning period under the emergency N-1 situation. This alternative would not likely solve the long-term voltage issues. There may be a short-term benefit associated with this alternative, but it would not be expected to be of a magnitude that would constitute a long-term solution to voltage violations.

Adding a new circuit to the western end of Newbury to Thousand Oaks line from the intersection of S. Reino Road and W. Potrero Road to Newbury Substation would likely require replacement of the approximately 110 existing wood poles with new LWS poles. Combined with the estimated 23 new LWS poles that would be required to link the Camgen facility to the idled line on Potrero Road, this scenario could require approximately 133 new poles. Compared to the Proposed Project, which would require installation of 24 new poles, this alternative would result in greater air quality impacts. In addition, this alternative would be developed in rural and dense residential areas, within the City of Thousand Oaks and unincorporated Ventura County, which could result in significant construction-noise impacts to a substantially greater amount of sensitive receptors compared to the Proposed Project. Therefore, implementation of this alternative would not avoid or reduce the air quality and noise significant impacts that would occur under the Proposed Project. This alternative would also result in greater adverse traffic-related impacts during construction along S. Reino Road, and U.S. 101 (associated with an overhead crossing) compared to the Proposed Project. For these reasons, this alternative is not considered to be a viable alternative because it would likely result in greater environmental impacts then the Proposed Project.

The commenter indicates that the pole replacements associated with this alternative could be done in conjunction with pole replacements for the Newbury to Thousand Oaks line that would occur regardless of the project due to the 50-year age of the existing poles, suggesting that the associated environmental effects would be associated with the pole replacement project, and not the alternative associated with this Proceeding. SCE has not reported plans, imminent or otherwise, to the CPUC to replace any of the existing poles associated with the Thousand Oaks to Newbury line. Regardless, any pole replacements that would be associated with this alternative would have to be evaluated as part of the alternative. It would not be appropriate for the CPUC to not evaluate the effects

of those pole replacements as the whole of the alternative simply because they would have to be replaced someday regardless of this Proceeding.

The commenter also identified scenarios for this alternative that would include a tap on the new Camgen to Newbury line that would connect directly to Pharmacy Substation, or to the Moorpark-Newbury-Pharmacy line. As described above, Pharmacy Substation was not constructed in a way that would accommodate a second 66 kV line. Installation of a new 66 kV line into Pharmacy Substation would require a complete substation rebuild that would require a greater sized property than the current one on which the substation is located (SCE, 2015a). In addition, a new tap line from a Camgen to Newbury line to the Moorpark-Newbury-Pharmacy line would cause reliability issues. If there was a direct tap from the new Camgen to Newbury line to the Moorpark-Newbury-Pharmacy line under this alternative, all of the associated terminals would de-energize at the same time if there was an outage on the Moorpark-Newbury-Pharmacy line. Therefore, the Camgen to Newbury line would also be de-energized under this N-1 scenario. This alternative would also do nothing to correct the projected base case overload on the Moorpark-Newbury-Pharmacy 66 kV line under normal system conditions (see Final EIR Response O9-1 in Section 3.2). Therefore, this scenario is not considered to be a viable alternative.

Alternative 4 Variant – Add a tap on the current Newbury to Thousand Oaks line

The commenter describes this scenario as not being dependent on either reconductoring or a second line on the Newbury to Thousand Oaks poles, but would add a new tap line from the existing Newbury to Thousand Oaks line to the Moorpark to Newbury segment or the Pharmacy segment of the Moorpark-Newbury-Pharmacy line. As discussed above for the other Alternative 4 variant options, this alternative would not likely solve the long-term N-1 voltage issues given that the majority of the electrical load would be met via energy flowing from Thousand Oaks Substation and the majority of the voltage decay would occur over the Camgen-Newbury-Thousand Oaks portion of the system. There may be a short-term benefit associated with this alternative, but it would not be expected to be of a magnitude that would constitute a long-term benefit.

In addition, a new tap line from the Newbury to Thousand Oaks line to the Moorpark-Newbury-Pharmacy line would not provide any difference in reliability because the same type of outage situation that causes an outage to the existing line would impact this alternative in the same manner. If there was a direct tap from the Newbury to Thousand Oaks line to the Moorpark-Newbury-Pharmacy line under this alternative, all of the associated terminals would de-energize at the same time if there was an outage on the Moorpark-Newbury-Pharmacy line. Therefore, the Newbury to Thousand Oaks line, including the Camgen tap line, would be de-energized under this N-1 scenario. In addition, this alternative would do nothing to correct the projected base case overload on the Moorpark-Newbury-Pharmacy 66 kV line under normal system conditions (see Final EIR Response O9-1 in Section 3.2). Therefore, this scenario is not considered to be a viable alternative because it would not meet the basic CEQA objectives for the Proposed Project (Refer to Master Response 1A for a discussion of the alternatives screening process, including analysis relative to the CEQA objectives).

The commenter also referenced previous comments on the Draft EIR relative to distributed resource projects that could be implemented to avoid the projected overload on the Moorpark-Newbury-Pharmacy line. This comment was addressed in the Final EIR. Refer to Master Response IB, *Demand-Side Management and Renewable and Distributed Energy Generation Alternatives* (see Final EIR pages 3.1-6 through 3.1-8).

Comments Received October 12, 2015

The comment letter presented a summary of alternatives suggested to meet the CEQA objectives for the Proposed Project to add capacity and to maintain sufficient voltage.

Alternatives to add capacity to meet forecasted electrical demand

The comment letter listed ten alternatives that the commenters suggest would add capacity to meet the forecasted electrical demand while providing long-term, safe, and reliable electrical service in the electrical needs area. Below are discussions of where the comments are addressed.

Funding of the governmental energy efficiency and solar PV projects

Energy efficiency and solar project alternatives are addressed in the Final EIR. Refer to Response I5-6, and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and renewable and distributed energy generation alternatives.

Funding of private solar PV projects

Solar PV project alternatives are addressed in the Final EIR. Refer to Response I5-6, and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and renewable and distributed energy generation alternatives.

Transfer a small portion of a distribution circuit to Thousand Oaks Substation

This alternative is addressed above. See the first alternative discussion under *Comments Received September 9, 2015*.

Implement a portion of the 6 megawatt (MW) of energy efficiency and demand response

Energy efficiency and demand response programs as alternatives are addressed in the Final EIR. Refer to Response I5-6, and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and distributed energy generation alternatives.

Initiate a program that focuses on low income housing energy efficiency

Energy efficiency programs as alternatives are addressed in the Final EIR. Refer to Response I5-6, and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management as an alternative.

Provide funding and the interconnection to allow the City of Thousand Oaks Hill Canyon Waste Water Treatment Plant to expand solar PV and methane generation

Projects at the Hill Canyon Waste Water Treatment Plant and general renewable energy projects as alternatives are addressed in numerous places in the Final EIR. Refer to Responses I5-6 and I50-20, and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and renewable and distributed energy generation alternatives.

Provide AMGEN with an energy efficiency grant to implement thermal storage

Electricity storage as an alternative is addressed in the Final EIR. Refer to Response I50-3 and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and distributed energy generation alternatives.

Conduct a heating, ventilating, and air conditioning (HVAC) replacement program

Demand-side management programs as an alternative are addressed in the Final EIR. Refer to Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management alternatives.

Implement storage facility at Newbury Substation

Electricity storage as an alternative is addressed in the Final EIR. Refer to Response I50-3 and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management and distributed energy generation alternatives.

Demand response

Demand-side management programs as an alternative are addressed in the Final EIR. Refer to Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on demand-side management.

Alternatives to add capacity to meet forecasted electrical demand

The comment letter indicates that since the initial power flows for the Proposed Project do not include the scenario of Pharmacy Substation being re-energized during an N-1 scenario, it is unknown if the Proposed Project would meet the voltage reliability criteria. However, given that the Proposed Project would result in a new line between Moorpark Substation and Newbury Substation, there would be more than enough voltage support available at Newbury Substation to allow Pharmacy Substation to be re-energized without resulting in a voltage violation at Newbury Substation.

The commenters also listed four alternatives they suggest would result in the maintenance of sufficient voltage in accordance with applicable requirements during normal and abnormal system conditions. Below is a discussion of where those comment are addressed.

Reconnect the CAMGEN Substation

The comment acknowledges the voltage violation at Newbury Substation during the N-1 contingency and reconnection of Pharmacy Substation, but indicates that the available capacity at Thousand Oaks and Potrero substations can solve the voltage problem. Because the demand to be transferred from Newbury Substation would be more than the available capacity at Thousand Oaks and Potrero substations, this alternative is not considered to be feasible. Refer to the first alternative discussion under the responses to the late *Comments Received September 9, 2015*.

Reconnect the CAMGEN Station and reconductor a portion of Newbury to Thousand Oaks line

This is addressed in the Final EIR as a combination of Alternatives 1 and 4. A voltage violation under the N-1 contingency and the reconnection of Pharmacy Substation could occur the first year this alternative would be implemented. Refer to the *Alternatives Screening* discussion in Final EIR Master Response 1A (Final EIR Section 3.1.1).

Use of Amgen's back-up generators

This has been addressed. Refer to the third alternative discussion above, under *Comments Received September 9, 2015*.

Preferred resources

This is addressed in the Final EIR. Refer to Response I50-3 and Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on distributed energy generation alternatives.

Comments Received October 16, 2015

The commenter states that the CSUCI Site Authorization Board recently held a special meeting regarding the status of the Camgen facility, and at the meeting a board member advocated reconnection of the facility to Newbury Substation. This information does not change the outcome of the Draft EIR alternatives screening analysis for Alternative 4, Reconnect the Camgen Generator to the Moorpark System. As discussed in the Draft EIR (see Section 4.5.4.2, *Rationale for Elimination*), Alternative 4 was eliminated from full consideration in the EIR because this alternative would not address the forecasted N-1 violation on the Moorpark System.

The commenter states that the alternatives described in the late comments received September 9 and 24, and October 12, 2015, are sufficient to address the projected overload of the Moorpark-Newbury-Pharmacy line. These alternatives have been addressed. See the discussions above.

Regarding the projected voltage drop violation under the N-1 contingency, the commenter states that SCE has focused on the loss of the Newbury to Thousand Oaks line. This is incorrect. To clarify, the N-1 contingency described by SCE is the loss of the Moorpark-Newbury segment of the Moorpark-Newbury-Pharmacy line. For discussion related to the Camgen connection option, refer to the *Reconnect to the Camgen Station* discussion under *Comments Received October 18, 2015*.

Comments Received October 18, 2015

The comment letter calls into question adjustments SCE made to the peak load demand for Newbury Substation in 2014 because similar adjustments were not made for years 2009 through 2013; however, the letter offers no evidence or facts to suggest that the peak load demand adjustment for 2014 is inappropriate. The commenter also calls into question the temperature adjustment made for year 2014, and indicates that it is understated because the adjustment should be exponential instead of linear. The data provided with the comments do not appear to support this reasoning. It appears the commenter used the wrong mean peak temperature to compare the temperature adjustments. As described in SCE's response to Ludington Data Request 13, question 5, the document titled "Effective Temperature Data" includes all available temperature data and do not limit the data to the previous 10-year average data as provided in past Effective Temperature Data reports (SCE, 2015b). Therefore, the mean temperature peak used in the temperature adjustments is 98.5 F (SCE, 2015b), not 98.1 F as suggested by the commenter.

The information presented in this comment letter has not persuaded CPUC to doubt the adequacy of SCE's forecasted peak load growth estimates for Newbury Substation. For a detailed discussion of how SCE estimates its distribution substation forecasts by incorporating and considering many different types of available data and methods, refer to Final EIR Master Response 5.

References

Southern California Edison (SCE), 2015a. Responses to Data Request Set A1310021 Ludington-SCE-12, September 4, 2015.

SCE, 2015b. Responses to Data Request Set A1310021 Ludington-SCE-13, September 9, 2015.