

CHAPTER 2

Background

2.1 Introduction

As discussed in Chapter 1, *Introduction*, portions of the Southern California Edison Company (SCE) Moorpark-Newbury 66 kV Subtransmission Line were constructed in 2010 and 2011, prior to the issuance of California Public Utilities Commission (CPUC, the Commission) Decision 11-11-019, which halted all construction associated with the line in November of 2011. This chapter provides an overview of past CPUC procedural activities, past construction activities associated with the Moorpark-Newbury 66 kV Subtransmission Line, and the environmental effects of past construction activities as reported by SCE in its Proponent’s Environmental Assessment (PEA) (SCE, 2013).

For clarity, the portion of the Moorpark-Newbury 66 kV Subtransmission Line that has already been constructed is referred to as “the project” or “past construction.” Portions of the Moorpark-Newbury 66 kV Subtransmission Line yet to be constructed are referred to in this Environmental Impact Report (EIR) as the “Proposed Project.”

2.2 CPUC Procedural Activities

On October 2, 2008, SCE filed Advice Letter 2272-E, notifying the CPUC of SCE’s proposed construction of the Moorpark-Newbury 66 kV Subtransmission Line (the project). Advice Letter 2272-E explained that the project would be exempt from Permit to Construct (PTC) requirements pursuant to General Order (GO) 131-D, Section III, Subsection B.1.g. (Exemption g.). In response to protests to the Advice Letter, the CPUC issued Executive Director’s Action Resolution E-4225 in February 2009, which found that the project qualified for Exemption g, and the protests were dismissed. Resolution E-4225 was then appealed. In September 2009, the CPUC held a public participation hearing where comments from the public were received. Following the hearing, Resolution E-4243 was approved by the Commission at a Business Meeting in March 2010. As approved, Resolution E-4243 affirmed the findings of the previously issued Resolution E-4225, found that the project qualified for Exemption g, and dismissed the protests.

However, in April 2010, several individuals filed an Application for a Rehearing of the Commission’s approval of Resolution E-4243. Because that Application for Rehearing did not request a stay of construction, and because the CPUC did not issue a stay of construction, SCE informed the CPUC Energy Division that it planned to start construction of the project in the fall of 2010. Construction of the project commenced in October 2010, with a planned operational date of June 2012. However, in November 2011, the Commission granted the Application for a

Rehearing and all construction activity was halted due to the issuance of CPUC Decision 11-11-019. This decision ordered SCE to cease construction activity, provide certain specified information, and file a PTC Application if it wished to complete the project.

SCE filed an application (A. 13-10-021) with the CPUC in October 2013, for a PTC the remaining portions of the project that have yet to be constructed (the Proposed Project). The application included the Proponent's Environmental Assessment (PEA), which evaluates the potential environmental impacts of the Moorpark-Newbury 66 kV Subtransmission Line, both past construction (the project) and construction to be completed (the Proposed Project).

The CPUC issued a Notice of Preparation (NOP) of an EIR for the Proposed Project on March 26, 2014. Through consultation with the CPUC Staff Council, the CPUC Energy Division staff determined that SCE's past project-related activities and their associated environmental effects would be disclosed as part of the environmental baseline conditions described in this chapter and in the environmental settings provided in Sections 5.1, *Aesthetics*, through 5.18, *Utilities and Service Systems*. This is consistent with CEQA Guidelines Section 15125(a), which states:

- (a) *An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...*

Therefore, past project activities are not analyzed in Chapter 5, *Environmental Analysis*, of this EIR, and because the components of the project completed during the past construction activities are considered to be part of the EIR baseline and will not have continuing effects that could combine with those of the Proposed Project, these components are not identified or analyzed as a "past project" in Chapter 7, *Cumulative Effects*.

Per the requirements of CPUC Decision 11-11-019, this chapter discloses the extent of construction that has occurred, and contains SCE's evaluation of the effect of that construction on the permitting process. The effects of past project construction are provided for informational purposes only, and are not assigned impact significance determinations (e.g., less than significant impact, less than significant with mitigation).

2.3 Past Construction Activities

The Moorpark-Newbury 66 kV Subtransmission Line alignment is located generally between State Route 118 (SR 118; also known as Los Angeles Avenue) to the north, U.S. Highway 101 (U.S. 101) to the south, and west of State Route 23 (SR 23), in the City of Moorpark, City of Thousand Oaks, and in portions of unincorporated Ventura County between the two cities.

To facilitate discussion of the project, the Moorpark-Newbury 66 kV Subtransmission Line components have been subdivided into four discrete geographic segments. Portions of each segment were constructed between October 2010 and November 2011, as described below. **Figure 2-1, Past**

Project Area and Index Map, provides an index for Figures 2-2 through 2-4, which provide detailed illustrations of the past project components that are associated with Segments 1 through 4.

2.3.1 Segment 1

As illustrated in **Figure 2-2, Past Activities within Segments 1 and 2**, Segment 1 is located entirely within the fenceline of the Moorpark Substation. Segment 1 begins at the 66 kV switchrack and extends west to a location near the substation fenceline, where it turns north and continues to a riser tubular steel pole (TSP) near the northwest corner of the substation. SCE constructed the following components during past activities in Segment 1:

- Installed a single TSP pole on the substation property; and
- Constructed 700 feet of duct bank consisting of six 5-inch conduits and two underground vaults. Approximately 20 feet of the duct bank was installed in 28-inch steel casing under the SCE railroad spur located within Moorpark Substation.

2.3.2 Segment 2

Segment 2 begins at the fence line of the Moorpark Substation and terminates at pole location 28 near the City of Thousand Oaks boundary (see **Figure 2-2, Past Activities within Segments 1 and 2**, and **Figure 2-3, Past Activities within Segments 2 and 3**). Project Segment 2 is located entirely within 5 miles of SCE's existing Moorpark-Ormond Beach 220 kV ROW. SCE constructed the following components during past activities in Segment 2:

- Installed 24 TSP foundations (pole locations 2-25);
- Installed 21 complete TSPs (pole locations 2-22); and
- Installed part of one TSP (only base of pole installed at pole location 23).

2.3.3 Segment 3

Segment 3 extends approximately 3 miles from the termination of Segment 2 (north of the boundary of the City of Thousand Oaks), and then south and east to the northern terminus of Segment 4, approximately 0.3 mile west of the intersection of Conejo Center Drive and Rancho Conejo Boulevard (see Figure 2-3 and **Figure 2-4, Past Activities within Segments 3 and 4**). With the exception of approximately 400 feet at its northern end, all of Segment 3 is located in open space lands managed by Conejo Open Space Conservation Agency (COSCA). SCE constructed the following components during past activities in Segment 3:

- Excavated holes for three TSP foundations and then subsequently filled them with slurry (pole locations 29-31); and
- Constructed five TSP foundations (pole locations 33-37).

2.3.4 Segment 4

Segment 4 extends approximately 1 mile from the southern terminus of Segment 3 to Newbury Substation. SCE has constructed the following components in Segment 4:

- Removed 27 wood subtransmission poles (pole locations 41 through 67);
- Installed 27 light-weight steel (LWS) subtransmission poles (pole locations 41 through 67);
- Transferred the existing Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line from wood subtransmission poles to newly-installed LWS poles;
- Installed a portion of 954 stranded aluminum conductor (SAC) for the new Moorpark-Newbury 66 kV Subtransmission Line;
- Installed a portion of the total length of fault return conductor (FRC); and
- Transferred existing distribution lines and third-party facilities to new subtransmission structures.

2.3.5 Land Disturbance

Land disturbance for the project included surface modifications to: rehabilitate existing access and spur roads including widening the existing roadbed at curves and other locations; construct one new approximately 100-foot spur road; rehabilitate and/or establish construction work areas for pole installation, pole and tower removal, and stringing locations; and install guard structures (see Figures 2-2 through 2-4).

In some locations along the access road network, more extensive rehabilitation was necessary, including: installing new, or repairing existing, drainage structures such as water bars, oversized drains, and pipe culverts to prevent road damage due to uncontrolled water flow; and repairing and stabilizing slopes to prevent future failures including installing a Hilfiker retaining wall (i.e., welded wire mesh and backing mats) adjacent to pole location 38, a soldier-pile wall between pole locations 12 and 13, and jute soil erosion control mats adjacent to pole locations 38, 39, and 40.

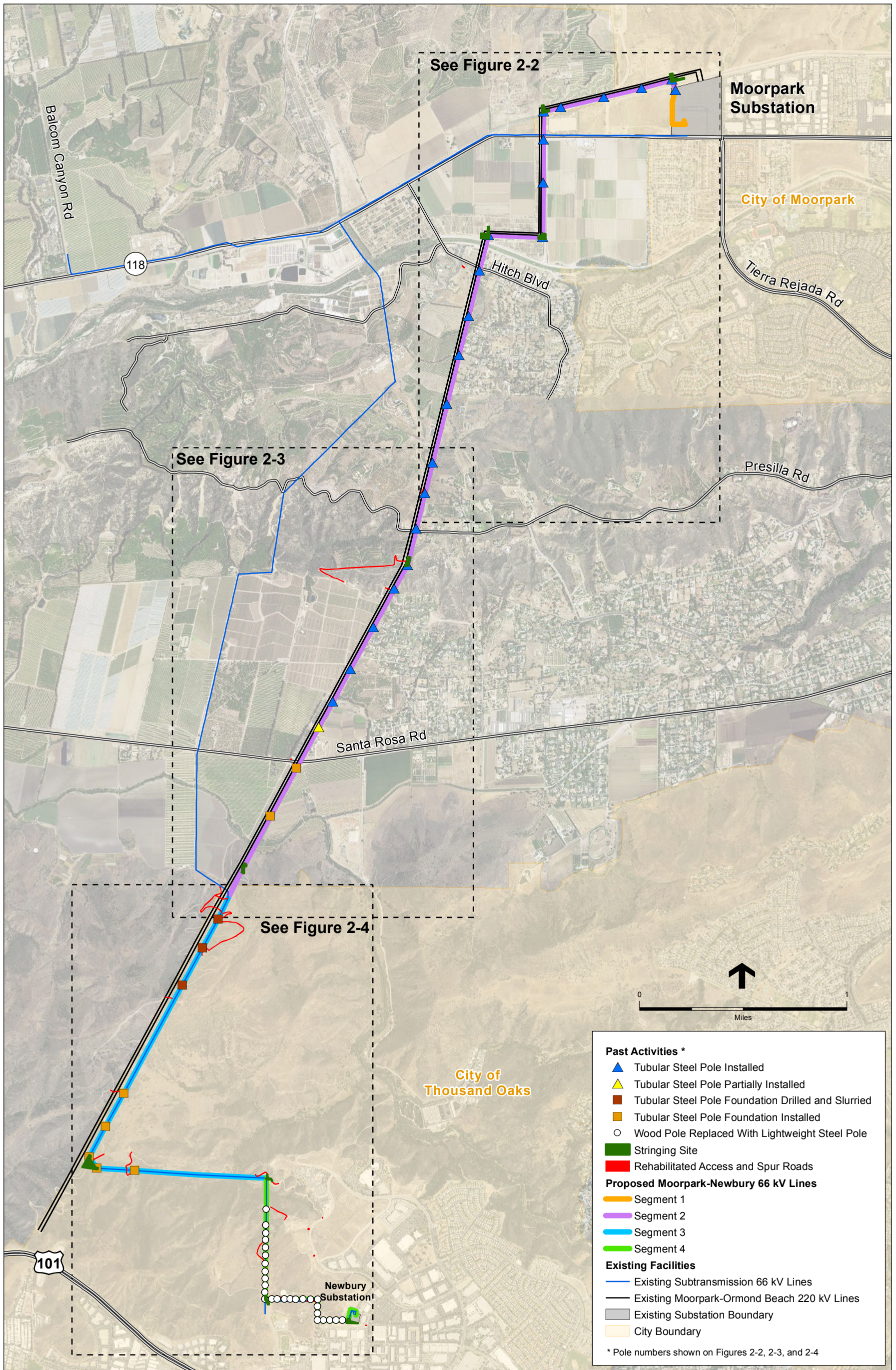
The total land disturbance that occurred during past construction activities for the project was approximately 16.68 acres, of which 11.79 acres remain disturbed (SCE, 2014). The estimated amount of land disturbance for each project component is summarized below in **Table 2-1**, *Estimated Area of Past Construction Land Disturbance*.

**TABLE 2-1
ESTIMATED AREA OF PAST CONSTRUCTION LAND DISTURBANCE**

| Past Project Feature | Sites or Miles | Acres Disturbed During Construction | Acres Restored | Acres Currently Disturbed |
|------------------------------------------|----------------|-------------------------------------|----------------|---------------------------|
| Rehabilitated Existing Access/Spur Roads | 21 miles | 4.82 | 0 | 4.82 |
| Installed Tubular Steel Poles | 39 sites | 5.92 | 4.60 | 1.32 |
| Installed Lightweight Steel Poles | 27 sites | 0.44 | 0.29 | 0.15 |
| Removed Wood Poles | 27 sites | 0 | 0 | 0 |
| Stringing Sites | 10 sites | 5.42 | 0 | 5.42* |
| Guard Structures | 0 sites | 0 | 0 | 0 |
| Removed Existing Lattice Steel Towers | 14 sites | 0.08 | 0 | 0.08* |
| Total | | 16.68 | 4.89 | 11.79 |

* Denotes that acres disturbed during past construction activities have not yet been restored; however, the disturbed acres would be restored under the Proposed Project (see Chapter 3, *Project Description*). The other currently disturbed areas associated with rehabilitated existing access/spur roads, installed TSPs, and installed LWS poles are considered to be permanently disturbed.

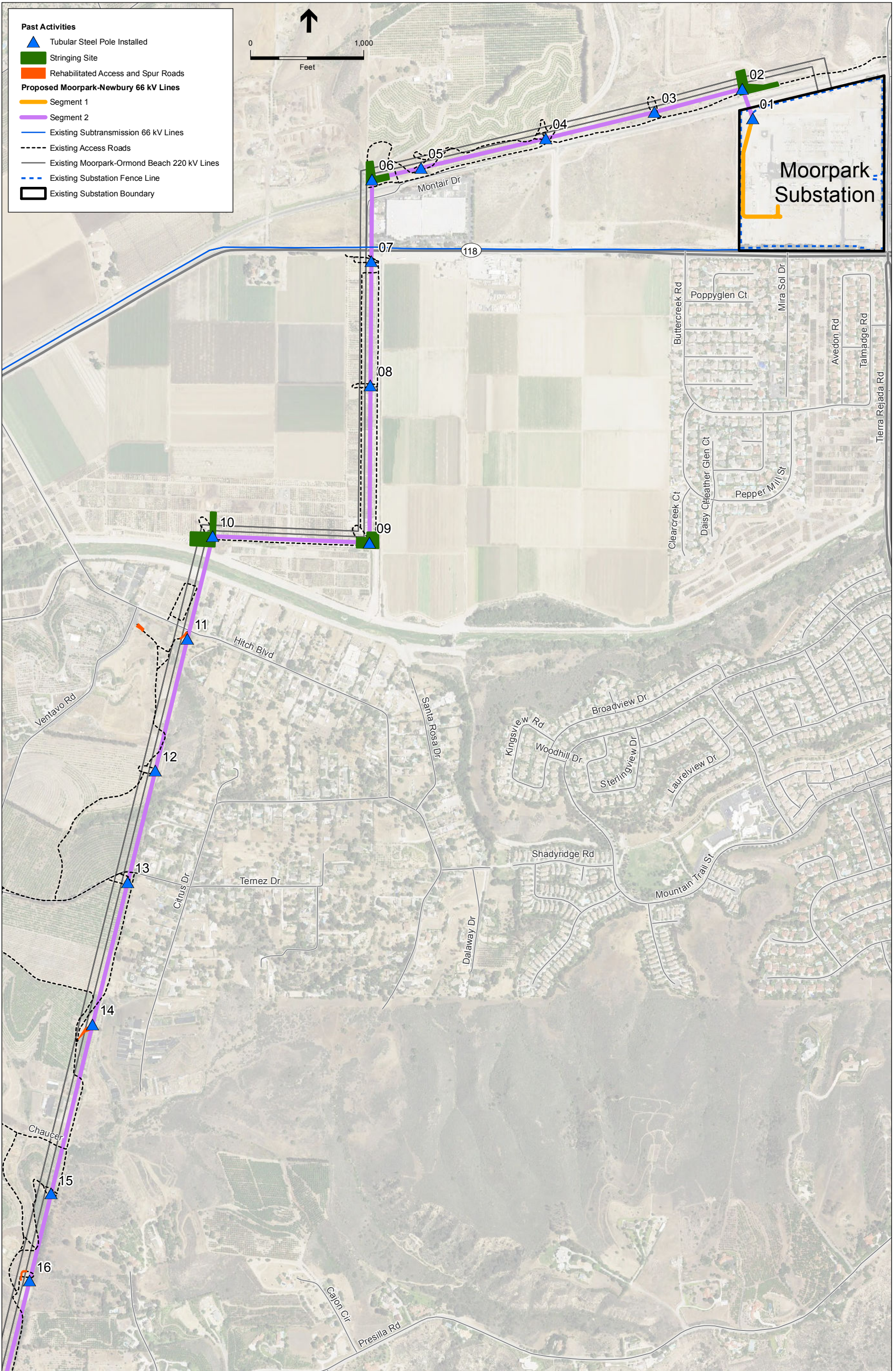
SOURCE: based on SCE, 2014.



SOURCE: SCE, 2013

Moorpark-Newbury 66 kV Subtransmission Line Project. 207584.15

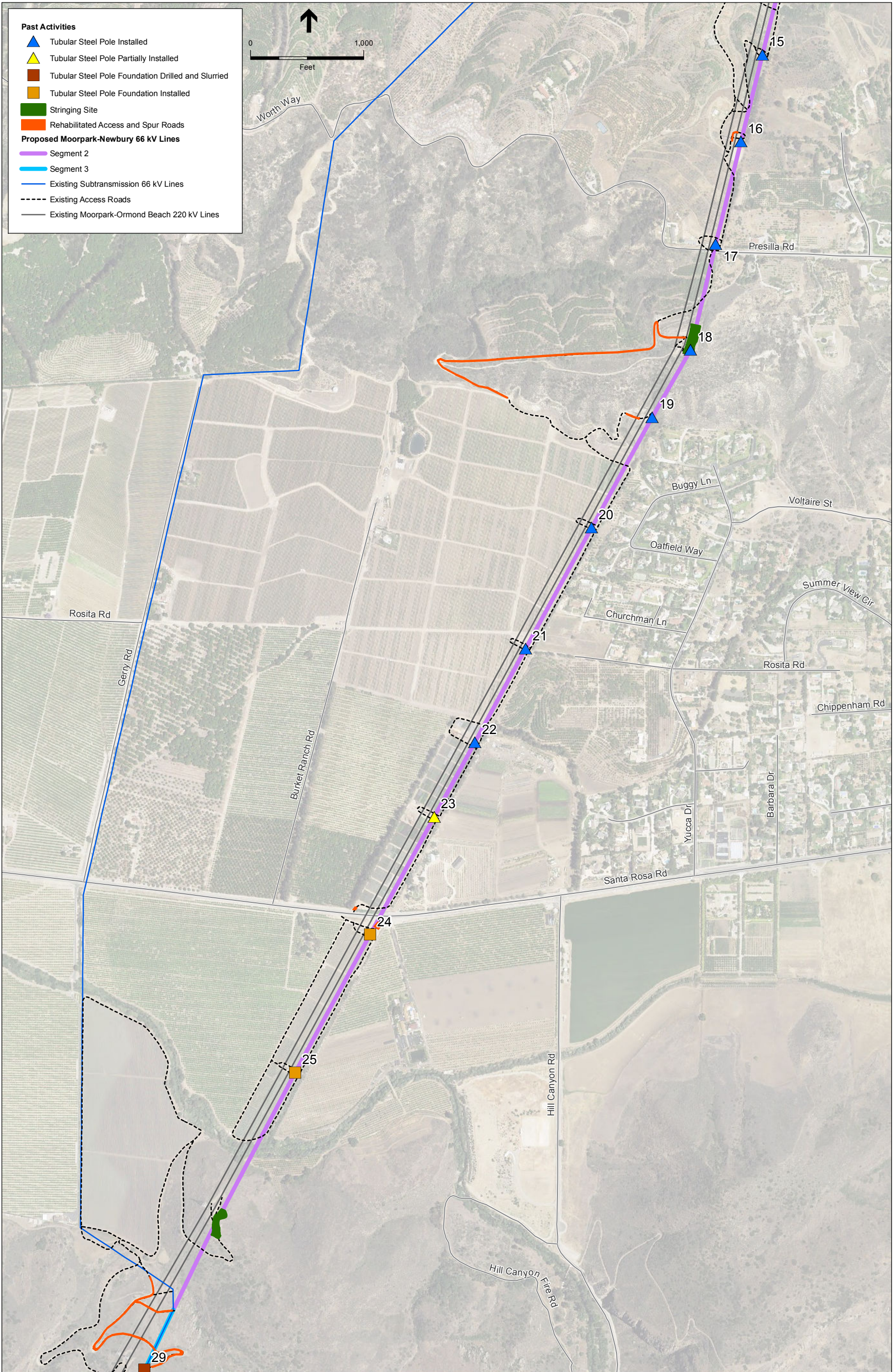
Figure 2-1
Past Project Area and Index Map



SOURCE: SCE, 2013

Moorpark-Newbury 66 kV Subtransmission Line Project. 207584.15

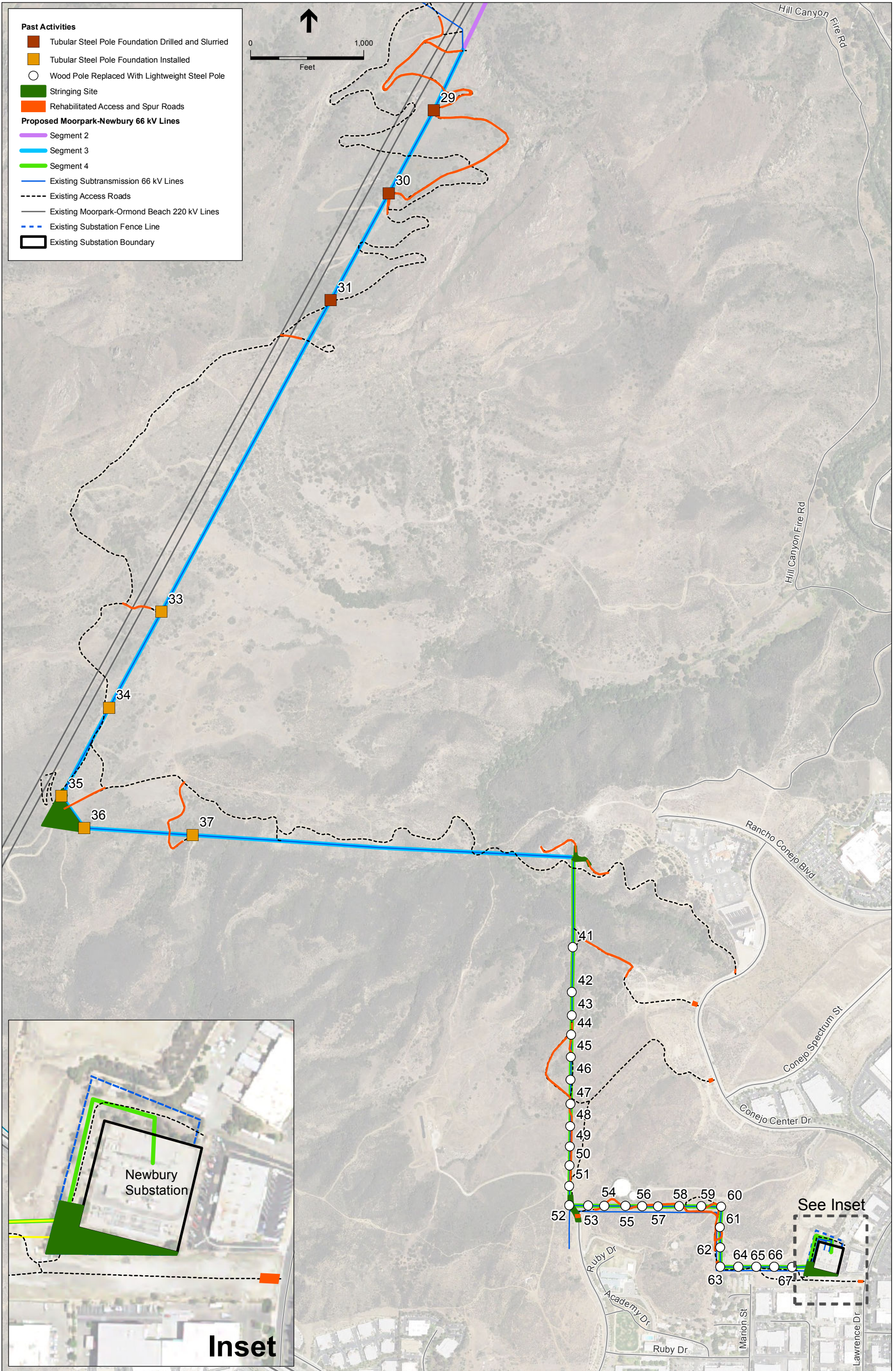
Figure 2-2
Past Activities within Segments 1 and 2



SOURCE: SCE, 2013

Moorpark-Newbury 66 kV Subtransmission Line Project. 207584.15

Figure 2-3
Past Activities within Segments 2 and 3



SOURCE: SCE, 2013

Figure 2-4
Past Activities within Segments 3 and 4

2.4 Effects of Past Construction Activities

The descriptions of effects of past construction activities are summarized below from SCE's PEA (SCE, 2013). It should be noted that SCE's descriptions of the effects of past construction activities do not reflect the CPUC's independent judgment; as stated in Section 2.2, *CPUC Procedural Activities*, the effects of past project construction are provided for informational purposes only, and are therefore, not assigned CEQA impact significance determinations.

2.4.1 Aesthetics

Past construction activities were not visible from designated scenic vistas because there are no defined scenic vistas in the vicinity of the project, and the project was not visible from the Lake Sherwood Scenic Resource Area. Project components are visible from some trails on COSCA-managed lands, including trails with panoramic views. Named trails within this area are located approximately 1 mile away from the project alignment, and unnamed trails near the project alignment often coincide with utility access roads. SCE maintains that the light-colored LWS poles blend into the background more readily than the darker wood poles, and become hard to distinguish at distance from the viewer.

There are no Officially Designated State Scenic Highways as defined in California Streets and Highways Code Sections 260-263 that were crossed by, or adjacent to, any components of the project. The nearest Officially Designated State Scenic Highway is a portion of State Route 33 (SR 33) located approximately 30 miles northwest of the project; no component of the project is visible from this road. Because the past construction activities were not located within view of an Officially Designated State Scenic Highway, they did not substantially affect scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within an Officially Designated State Scenic Highway.

Construction related visual impacts resulted from the presence of equipment, materials, and work crews along the route and at the substations. To varying degrees, construction activity may have been seen by local residents, motorists, and recreationists, and was likely most noticeable from the residential areas located in close proximity to the project and by users of trails on COSCA-managed lands that also serve as SCE access roads.

Past construction activities included rehabilitating access and spur roads and establishing temporary staging yards for vehicle and equipment parking and material storage. In addition, past construction activities included grading of areas that may have been noticeable to the public. Restoration of some temporary work areas and graded slopes has already occurred, thus reducing potential visual contrast with the surrounding landscape setting.

Project elements installed during past construction activities, including TSPs and LWS poles, are presented in **Table 2-2, Summary of Past Project-Related Visual Changes**. These TSPs and LWS poles were installed within SCE's existing ROW, which contained existing portal-type transmission towers and subtransmission, LSTs, and wood poles. TSPs along some portions of the project segments were installed adjacent to existing portal-type towers, and are either shorter than, or

**TABLE 2-2
SUMMARY OF PAST PROJECT-RELATED VISUAL CHANGES**

| Project Component, Primary Viewers, and Representative Photographs/Visual Simulations in PEA | Past Project Construction and Visual Change |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Segment 1 Motorists, Residents PEA Photograph Viewpoint 1</p> | <ul style="list-style-type: none"> Installed one new TSP riser pole and made minor modifications at Moorpark Substation. <p>Minor visual change within the context of an established substation with numerous transmission and subtransmission towers, poles, and lines present.</p> |
| <p>Segment 2 Motorists, Residents, bicyclists PEA Photograph Viewpoints 1 through 9; Simulation Photograph Viewpoint 2 (PEA Figure 4.1-5f); Simulation Photograph Viewpoint 6 (PEA Figures 4.1-4a and 4.1-5a); Simulation Photograph Viewpoint 7 (PEA Figure 4.1-5b); Simulation Photograph Viewpoint 8 (PEA Figure 4.1-5c)</p> | <ul style="list-style-type: none"> Installed 21 new TSPs; Installed the foundation and base portion of one TSP; and Installed two TSP foundations. <p>Minor visual change to the established SCE ROW that has numerous transmission and subtransmission towers, poles, and lines present.</p> |
| <p>Segment 3 Motorists, Recreationists, Residents PEA Photograph Viewpoints 8, 10 through 13; Simulation Photograph Viewpoint 8 (PEA Figure 4.1-5c); and Simulation Photograph Viewpoint 10 (PEA Figures 4.1-4c and 4.1-5e)</p> | <ul style="list-style-type: none"> Excavated holes for three TSP foundations and filled them with slurry; and Installed five TSP foundations. <p>Minor visual change; almost imperceptible.</p> |
| <p>Segment 4 Motorists, Residents, Recreationists PEA Photograph Viewpoints 10, and 14 through 16; Simulation Photograph Viewpoint 10 (PEA Figures 4.1-4c and 4.1-5e)</p> | <ul style="list-style-type: none"> Replaced 27 wood poles with 27 LWS poles, most of which were 5 feet taller than the removed wood poles; and Installed new 66 kV 954 SAC conductor and a portion of the total length of new 4/0 ACSR fault return conductor (FRC). <p>Minor incremental visual change within established SCE ROW with numerous subtransmission poles and lines present.</p> |

SOURCE: SCE, 2013.

roughly equivalent in height to, the existing portal-type transmission towers and subtransmission LSTs and wood poles. In the PEA, Figures 4.1-4a, 4.1-4b, and 4.1-4c present a set of views as seen from key observation points (KOPs) in the area where past construction activities occurred. These figures show the visual change created by past construction activities. The pre-construction view (the top picture in PEA Figures 4.1-4a, 4.1-4b, and 4.1-4c) is actually a simulation that portrays landscape conditions prior to the commencement of past construction activities.

PEA Figure 4.1-4a, a view from Yucca Drive near the entrance to the Santa Rosa Valley Estates gated residential development, represents a view experienced by motorists on this local road as well as residents in this area. The entry gate and residences are visible in the foreground. The 220 kV transmission lines supported by portal-type towers, visible on the undeveloped, scrub-covered hillside above the houses, are seen against a combination of sky and muted green landscape backdrop. Project TSPs were constructed alongside existing portal-type towers; the new TSPs, although noticeable, are grouped closely with these portal-type towers and are lower in height than the adjacent portal-type towers.

PEA Figure 4.1-4b shows a view from Santa Rosa Valley Park, a public open space area located on Hill Canyon Road. The view in PEA Figure 4.1-4b is looking northwest toward the project alignment as it crosses Santa Rosa Valley. This pre-construction view simulates that of recreational users of the park including hikers and equestrians, as well as that of a limited number of rural residents in the area. A picnic bench, rustic fence, and unpaved trail appear in the foreground and an agricultural building with a reddish colored roof located near a residence can also be seen on the left. The existing 220 kV transmission lines are supported by three pairs of light colored portal-type towers located approximately 2,000 feet away that appear against the darker green orchard backdrop. These towers are less noticeable in areas where they are seen against the muted-colors of scrub vegetation and bare soil of the Las Posas Hills. As shown in the current view photograph, a single TSP has been constructed alongside the portal-type towers. From this viewing distance, the TSP installed during past construction activities (located on the far right of the current view) represents a very minor change given the number of pre-existing utility elements seen within this existing ROW.

PEA Figure 4.1-4c portrays a simulated pre-construction view and a current view of the project as seen from a trail located within the Conejo Canyons area, approximately 1,000 feet north of the terminus of North Wendy Drive. This view is representative of those experienced by recreationists including hikers, bicyclists, and equestrians. Some trails in the Conejo Canyons area afford panoramic views toward undeveloped rugged landscape and mountains beyond. The pre-construction simulation in PEA Figure 4.1-4c was modified from a picture of the current state of the area to portray the condition of the area prior to the start of the past construction activities. In this area, the project route travels north (away from the viewpoint) for approximately 0.4 mile. In the pre-construction view, five wood poles are visible in the foreground. LSTs are barely visible on the hillside against the rough texture and muted colors of the background landscape. In the distance on the ridge and against the hillside backdrop, LSTs are visible alongside a radio tower. Comparing the pre-construction and current views in PEA Figure 4.1-4c, the replacement LWS poles are visible in the foreground. Although slightly taller, the replacement LWS poles in the foreground are similar in form to the previously-installed wood subtransmission poles, though different in color.

Past construction activity did not involve installation of permanent lighting along the route. Past activities occurred primarily during daytime hours. On occasion, construction activities were performed at night; lighting used during nighttime work was directed and focused away from potentially sensitive receptors to the extent feasible.

With respect to potential glare effects, the majority of the conductor installed in project Segment 4 as part of the past construction activities is non-specular. In addition, the TSPs and LWS poles are galvanized steel and the TSPs have a dulled finish; all poles will dull further over time minimizing light or glare that would adversely affect day or nighttime views in the area.

2.4.2 Agriculture and Forestry Resources

Past construction activities in project Segments 2 and 3, including the establishment of construction work sites for the installation of TSPs, the rehabilitation of access and spur roads, and the establishment of three stringing sites, permanently disturbed approximately 3.23 acres of

Important Farmland, including 0.21 acre of *Prime Farmland*, 0.15 acre of *Farmland of Statewide Importance*, and 2.31 acres of *Unique Farmland*. These conversions represent a loss of approximately 0.003 percent of the approximately 104,695 acres of Important Farmland identified in Ventura County. Since the conclusion of the past construction activities, all disturbed areas have been, and will remain, maintained (i.e., graded and/or kept free of vegetation) subject to agreements between SCE and landowners.

In unincorporated Ventura County, past construction activities occurred in existing ROWs on lands zoned for agricultural use. The project traverses lands zoned *Agricultural Exclusive (AE)*, Section 8105-4, *Permitted Uses in Open Space, Agricultural, Residential and Special Purpose Zones*, of the Ventura County Non-Coastal Zoning Ordinance states that overhead transmission lines are a permitted use subject to receipt of a “Planning Director-approved Conditional Use Permit.” However, pursuant to GO 131-D, Section XIV.B, the project did not require a conditional use permit. Past construction activities were conducted on lands under Williamson Act contracts. Electrical transmission facilities are recognized in the California Government Code as a compatible use on Williamson Act lands. For these reasons, past project construction activities did not conflict with applicable zoning regulations regarding agricultural use, and did not conflict with any applicable Williamson Act contract.

Some past construction activities occurred on lands defined as forest lands; these activities permanently disturbed approximately 4.47 acres. However, neither the temporary nor permanent disturbances associated with past construction activities impacted the lands’ ability to support 10 percent native tree cover of any species, and thus no forest lands were reclassified as non-forest lands under Public Resources Code Section 12220(g). No timberland or lands zoned Timberland Production as defined above are crossed by the project.

Past construction activities of the project did not involve any other changes in the existing environment that resulted in the conversion of Farmland to non-agricultural use or forest land to non-forest use. In addition, staging yards were sited to avoid conversion of Farmland or forest land to other uses.

2.4.3 Air Quality

During past construction activities, emissions were generated from operation of heavy equipment and support vehicles over a period of approximately 14 months. **Table 2-3** summarizes the emissions SCE has estimated to be associated with past construction activities.

**TABLE 2-3
SUMMARY OF ESTIMATED CONSTRUCTION EMISSIONS FROM PAST ACTIVITIES**

| Source | Estimated Project Emissions (lbs/day) | | | |
|-------------------------------------------------------------|---------------------------------------|-----------------|------------------|-------------------|
| | ROG | NO _x | PM ₁₀ | PM _{2.5} |
| Subtransmission Line and Substation Construction Activities | 78.91 | 726.64 | 52.28 | 38.20 |

SOURCE: SCE, 2013.

The Ventura County Air Pollution Control District (VCAPCD) Guidelines set forth a process for assessing a project's consistency with the Ventura County Air Quality Management Plan (AQMP); this process includes assessing a project's conformity with the applicable General Plan and comparing the population growth associated with the project with that forecasted in the AQMP. Projects that do not conform to the applicable General Plans and that result in an increase in population above that which is forecasted in the AQMP are inconsistent with the AQMP. Past construction activities involved the installation of upgraded and new electrical subtransmission infrastructure, which did not induce, directly or indirectly, population growth in the area in a manner inconsistent with any applicable General Plan.

Past activities potentially exceeded VCAPCD Guideline thresholds for levels of reactive organic gases (ROG) and nitrogen oxides (NO_x). SCE practices, including minimizing equipment idling time and maintaining equipment engines in good condition and in proper tune as per manufacturers' specifications, reduced emissions of ROG and NO_x. These measures are also listed as mitigation measures in the VCAPCD Guidelines. In addition, construction activities were delayed and or stopped between the months of March and September due to the need to avoid impacts to nesting birds; this resulted in a lengthening of the construction schedule, therefore reducing emissions during VCAPCD's identified smog season (May through October). SCE also implemented practices from the VCAPCD Model Fugitive Dust Mitigation Plan during past construction activities.

Residences are located approximately 50 to 75 feet from some project components, and the nearest school is located approximately 850 feet from the subtransmission line. Pollutant emissions were distributed over the construction period (14 months), and were not concentrated in any one area. Pollutant emissions during construction were reduced through implementation of SCE practices, including minimizing equipment idling time, maintaining equipment engines in good condition and in proper tune as per manufacturers' specifications, and employing measures to reduce fugitive dust emissions as discussed above.

Potential odor sources associated with the past construction activities included equipment exhaust during construction activities. The emission of these odors was temporary, short-term and intermittent in nature, and ceased upon completion of construction.

2.4.4 Biological Resources

2.4.4.1 Construction Impacts, Plant Species

Two listed plant species were documented to occur in the project area: Conejo dudleya and Lyon's pentachaeta. One California Rare Plant Ranks (CRPR, formerly known as the California Native Plant Society [CNPS] List) watch list species—the Catalina mariposa lily (CRPR 4.2)—has been observed in the study area.

Potential impacts to special status plant species and individuals were avoided and minimized by implementing, among others, measures contained in an August 30, 2010 letter from SCE to Ms.

Diane K. Noda, Field Supervisor, Ventura Fish and Wildlife Office (see PEA Appendix F). During past construction activities, SCE implemented the following:

- Focused surveys for Lyon's pentachaeta and Conejo dudleya were conducted no more than 30 days prior to start of construction in areas with potentially suitable habitat.
- Areas supporting Lyon's pentachaeta were flagged prior to project activities by a qualified biologist and avoided during construction. In addition, a biological monitor was present during project activities occurring within the vicinity of these resources to ensure that no sensitive species were impacted.
- Areas supporting Conejo dudleya were flagged prior to project activities by a qualified biologist and avoided during construction. In addition, a biological monitor was present during project activities occurring within the vicinity of these resources to ensure that no sensitive species were impacted.
- When digging holes for pole replacements within Lyon's pentachaeta critical habitat the upper 6 inches of topsoil were salvaged/stockpiled within Lyon's pentachaeta critical habitat in order to maintain the native seed bank. The topsoil was 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.
- Where applicable, disturbed areas within Lyon's pentachaeta habitat were restored in accordance with the California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement (SAA) requirements.
- Project Worker Environmental Awareness Training, which included:
 - Instruction to keep vehicles on existing roads and pads;
 - Instruction to avoid impacts to drainages;
 - Instruction to minimize clearing of vegetation; and
 - Information regarding protected plant species that may be found in the project area, where they have been identified during past surveys, and protection measures that may be implemented.

Past construction activities included ground disturbing activities in an area designated by U.S. Fish and Wildlife Service (USFWS) as critical habitat for Lyon's pentachaeta (Unit 2: Montclef Ridge Unit, Subunit 2A); these activities included the grading of construction work sites adjacent to structure replacement/installation locations and the rehabilitation of already existing access and spur roads. During past project related grading activities, native soils were deposited by SCE on a sloped surface adjacent to pole locations 39 and 40. This resulted in a disturbance of approximately 0.16 acre of coastal sage scrub; although this disturbance occurred within an area designated by USFWS as critical habitat for Lyon's pentachaeta, no Lyon's pentachaeta individuals were detected in the disturbed area during focused surveys, pre-construction surveys, or during construction monitoring. The 0.16 acre of disturbance was restored at the direction of CDFW, at that time the California Department of Fish and Game (CDFG).

Focused surveys for Conejo dudleya were conducted prior to ground disturbing activities. Areas supporting Conejo dudleya were flagged for avoidance and a monitor was present to ensure avoidance during construction activities.

In addition, the replacement of 21 wood subtransmission poles with 21 LWS poles permanently disturbed approximately 0.15 acre within the area designated as critical habitat. Rehabilitation of existing dirt access roads resulted in a permanent disturbance of approximately 1.35 acres within the area designated as critical habitat. The development of stringing sites temporarily disturbed approximately 0.41 acre within the area designated as critical habitat. The permanent disturbance area associated with these activities (1.5 acres) represents less than 1 percent of the 862 acres of critical habitat contained within Subunit 2A.

Catalina mariposa lily, a CNPS List 4 species, occurs along the dirt access roads in Segments 2 and 3. Catalina mariposa lily often occur in large numbers on project sites and are considered relatively common within their range. No other special status species are known to occur or were observed in the project area.

2.4.4.2 Construction Impacts, Wildlife Species

Past construction activities associated with the project resulted in minor habitat loss and disturbance relative to the availability of habitat for the following species in the region. Additionally, past construction activities resulted in temporary noise and human presence, dust, and vibrations.

Special Status Reptiles

Five special status reptiles are known to occur in the vicinity of the project: silvery legless lizard, coastal whiptail, western pond turtle, coast horned lizard, and two-striped garter snake. Potentially suitable habitat exists for each of these species except western pond turtle. None of these species were observed during biological surveys. If individuals were present but unobserved in the project area, past construction activities would have resulted in limited indirect impacts such as noise and human presence, temporary dust, and periodic vibrations. No direct or indirect impacts to these species are known to have occurred.

Special Status Birds

One Federally-listed Threatened bird species, the coastal California gnatcatcher, is known to occur along the project alignment. The following avoidance and minimization measures, among others, were implemented to avoid or minimize direct and indirect impacts to the coastal California gnatcatcher:

- During the breeding season (February 15 through August 30), a protocol preconstruction survey for the coastal California gnatcatcher was conducted by a wildlife biologist possessing a valid recovery permit from the USFWS for the coastal California gnatcatcher.
- When project activities occurred during the breeding season (February 15 through August 30), a 500-foot buffer was established around the coastal California gnatcatcher nest site, and this area was 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) occurred during the breeding season (February 15 through August 30).
- Project activities that occurred within 500 feet of a mapped coastal California gnatcatcher territory were monitored by a qualified biologist who possessed a valid recovery permit for the species.
- A qualified biologist was present during clearing and replacement activities to ensure that native habitat (coastal sage scrub) removal was minimized.

Approximately 0.5 acre of potentially suitable coastal California gnatcatcher habitat along the length of the project was disturbed as a result of the project within Segment 3.

Two other Federally-Listed species, the Federally- and State-Endangered southwestern willow flycatcher (*Empidonax traillii extimus*) and least Bell's vireo are known to occur in the project area, though neither was observed during focused surveys performed in 2010 or during construction.

Three additional bird species that are considered special status, but not listed as Threatened or Endangered by state or federal resources agencies, occur along the project alignment: the coastal cactus wren, yellow warbler, and the southern California rufous-crowned sparrow.

Preconstruction surveys and surveys conducted during past construction activities did not identify these species in an active construction area, and no individuals of these species were known to be harmed during past project activities.

The project area provides potentially suitable foraging habitat for the golden eagle, a State Fully Protected Species; however, no golden eagles were observed prior to or during past construction activities. At the time of past construction activities, SCE's standard avian protection practices were employed. SCE's standard practices were developing based on available knowledge from available data and available equipment at that time. Past construction activities could have discouraged golden eagles from foraging in the immediate vicinity of an active construction area. This disruption in foraging would have been localized and temporary in nature.

Limited potentially suitable habitat for the burrowing owl occurs in the extreme northern portion of the project alignment, near Moorpark Substation. No individuals were observed during field surveys in 2010 and 2011 or by biological monitors during construction.

The project area provides potentially suitable foraging and nesting habitat for raptors, such as red-tailed hawks. Nesting bird surveys, including raptors, were conducted prior to project activities to avoid impacts to active nests. Past construction activities could have discouraged raptors from foraging in the immediate vicinity of an active construction area. This disruption in foraging would have been localized and temporary in nature.

Special Status Mammals

The San Diego desert woodrat has the potential to occur in the project area. This species is not listed or proposed to be listed as Threatened or Endangered, but is a CDFW Species of Concern.

This species was not observed during pre-construction field surveys or by biological monitors during construction in 2010 or 2011. If individuals were present but unobserved in the project area, past construction activities would have resulted in limited indirect impacts such as noise and human presence, temporary dust, and periodic vibrations. No direct or indirect impacts to this species are known to have occurred.

The project area may include foraging habitat for two bat species: western mastiff bat and pallid bat. However, neither species was observed during pre-construction field surveys or by biological monitors during construction in 2010 or 2011. Past construction activities did not affect the overall availability of prey in the project area for bats. Construction activities in the general area resulted in limited indirect impacts such as noise and human presence, periodic night lighting, temporary dust, and temporary vibrations.

2.4.4.3 Effects on Riparian Habitat or other Sensitive Natural Communities

Native Grasslands and Sage Scrub

Native grassland and sage scrub communities are found in project Segments 3 and 4. Impacts to sensitive plant communities were realized as a result of the ground disturbing activities. Temporary impacts to sensitive plant communities occurred in locations where native vegetation was removed but that was subsequently restored following the cessation of past construction activities; this includes the locations adjacent to pole locations 38, 39, and 40 where certain soils were deposited by SCE on sloped surfaces. Permanent impacts, as a result of construction, also occurred where sensitive plant communities were located on or immediately adjacent to access and spur roads that were rehabilitated and where permanent equipment pads were established.

Impacts to sensitive plant communities were avoided and minimized by incorporating recommendations provided in biological survey reports prepared for the project, among others. Impacts were avoided or minimized by:

- Conducting clearance surveys no more than 30 days prior to the start of construction in a particular area to identify potential plant and animal species that could have been impacted by construction activities. Clearance surveys included a field survey by a qualified botanist and were limited to areas that could have been directly impacted by construction activities.
- Implementing the Project Worker Environmental Awareness Training, which included:
 - Instruction to keep vehicles on existing roads and pads;
 - Instruction to avoid impacts to drainages;
 - Instruction to minimize clearing of vegetation; and
 - Information regarding protected plant species that may be found in the project area, where they have been identified during past surveys, and protection measures that may be implemented.
- A qualified biologist was present during clearing and restoration activities to ensure that native habitat (coastal sage scrub) removal was minimized.

Following the cessation of the past construction activities, the majority of disturbed areas were reclaimed, allowing for and encouraging the re-establishment of sensitive plant communities in these areas.

Riparian Habitat

Only limited project activities occurred within riparian habitat. To facilitate equipment access and protect the integrity of the access road, one existing culvert underneath an existing access road in project Segment 3 was cleaned out; during this activity, a few small willow trees were removed or trimmed.

2.4.4.4 Effects on Federally Protected Wetlands

No federally-protected wetlands were identified along the project alignment as defined by Section 404 of the Clean Water Act.

2.4.4.5 Interference with Fish Movement or Wildlife Nursery Sites

Past construction activities were temporary and affected small, geographically-dispersed areas at any one time; there is no evidence that past construction activities interfered substantially with the movement of any wildlife species, although past construction activities may have interfered with the movement of individual animals. No past construction activities occurred in any location that could have interfered with the movement of a fish species. Past construction activities did not substantially alter the physical characteristics of the project area, and did not introduce any new permanent uses that could interfere with an established wildlife corridor. There are no known native wildlife nursery sites in the project area.

2.4.4.6 Conflicts with Local Policies or Ordinances

Protected trees were trimmed and removed during the past construction activities. SCE retained a certified arborist to conduct surveys to identify trees that met regulatory protection standards. For their trimming and removal, SCE obtained two ministerial tree permits from the County of Ventura: 1) for the removal of two Eucalyptus trees and the trimming of 18 Eucalyptus trees in Segment 2, and 2) for the removal of 35 cottonwood trees in Segment 2.

2.4.4.7 Conflicts with Conservation Plans

No Habitat Conservation Plans or Natural Community Conservation Plans exist along the project alignment. Project Segments 3 and 4 traverse lands managed by COSCA; the management of these lands is guided by the Conejo Canyons Open Space Management Plan. Although the Management Plan is neither a defined Habitat Conservation Plan nor a defined Natural Community Conservation Plan, the Management Plan was prepared by COSCA in order to inventory the resources in the plan area, identify challenges and opportunities in managing these resources, and suggest actions to be taken for the long-term management and environmental sustainability of the land and resources within the Conejo Canyons. SCE has an easement through

this area that allows construction and maintenance activities associated with the existing utility corridor. The Management Plan acknowledges the presence of the utility corridor. SCE, as the easement-holder, coordinated with COSCA regarding past construction activities.

2.4.5 Cultural Resources

Regarding whether the project caused a substantial adverse change in the significance of a historical resource as defined in Section 15064.5, records searches and pedestrian survey results indicate that no historical resources are located within the area of potential impact.

Three archaeological resources were identified in locations where they could have potentially been impacted by past construction activities; one of these (P56-001797) was determined to be a potentially important archaeological resource that could meet the criteria for California Register of Historical Resources (CRHR) eligibility. Prior to the start of past construction activities, P56-001797 was physically isolated within an SCE-established Environmentally Sensitive Area (ESA) in which construction activities were prohibited, and from which construction workers were excluded. In addition to the protection provided by avoidance, the following were implemented:

- An archaeological monitor was on site during ground disturbing activity in the vicinity of the three archaeological resources.
- A preconstruction meeting to orient construction crews to sensitive areas was held prior to any ground disturbing activity within the vicinity of the three sites.
- Had cultural material that may have yielded sensitive information been uncovered during construction, then all work within a 15-meter radius of the discovery would have been halted until the find could have been evaluated by a qualified archaeologist. Had human remains been unearthed during excavation, no further disturbance would have occurred until the County Coroner had made the necessary findings as to origin and distribution pursuant to Public Resources Code Section 5097.98. However, no cultural material or human remains were uncovered during past construction activities.
- If construction was halted because of an archaeological discovery, no work would have begun within that area until written notification from a qualified archaeologist was given to the project manager or construction foreman.

In addition, SCE implemented its Project Worker Environmental Awareness Plan (WEAP), which included a discussion of cultural resources and established procedures for protecting known resources and treating previously unidentified cultural resources. No unanticipated discoveries were found during past construction activities.

The project area does not contain any known cemeteries or burial features. The potential for encountering Native American human remains exists throughout California, and it is not always possible to predict where Native American human remains might occur outside of formal cemeteries. However, no human remains were identified or disturbed during the past construction activities.

Portions of the project area are underlain by geological formations that have low to high sensitivity for paleontological resources. The past ground-disturbing construction activities included blading/grading existing access and spur roads, blading and grading construction work sites adjacent to existing structures, and drilling widely-spaced holes for TSP foundations. No paleontological resources were encountered during the past construction activities.

2.4.6 Energy Conservation

SCE did not include a description or analysis of effects of the project on energy conservation in its PEA (SCE, 2013).

2.4.7 Geology and Soils

The project crosses, and has the potential to be directly impacted by, surface rupture of the Simi-Santa Rosa Alquist-Priolo Earthquake Fault Zone (A-P Zone). Portions of the project were constructed within the A-P Zone. However, the subtransmission infrastructure was placed at locations on opposite sides of the mapped fault traces. There is a risk of very strong seismic ground shaking to occur in the project area due to nearby active fault zones. Even though the project is located in an area susceptible to earthquake forces, the subtransmission line poles installed for the project are not used for human occupancy and are designed consistent with CPUC GO 95, *Rules for Overhead Line Construction*, to withstand wind, temperature, and wire tension loads. Accounting for these factors results in a design that would be adequate to withstand expected seismic loading.

Liquefaction hazards are considered to be low in all areas of the project where past construction activities have occurred, with the exception of project Segments 1 and 2 within Little Simi Valley and project Segment 2 within Santa Rosa Valley, which are located within mapped Liquefaction Hazard Zones. SCE designed project components to minimize the potential for impacts associated with liquefaction. TSP structures located in potential liquefaction zones in the Little Simi and Santa Rosa valleys were designed with large diameter, relatively deep, single (mono) foundations. Settlements induced by dynamic (earthquake) forces are anticipated to be uniform for mono foundations, and therefore use of these foundations reduces the potential for differential settlements and other adverse effects including loss of functionality, or risk of injury or loss of life.

The potential for seismically-induced landslide hazards are a low to moderate in portions of the project area due to steep slopes (see PEA Figure 4.6-2). SCE designed and sited project components as follows to minimize the potential effects from landslides: project TSPs are not located on mapped landslides that could be subject to renewed movements during an earthquake event. Further, the hillside areas of the project are rated primarily with low susceptibility for earthquake-induced landslides instability, with a few areas with steep natural slopes rated with moderate susceptibility (see PEA Figure 4.6-2). Due to siting and design constraints, as well as access and constructability factors, TSPs are generally not located on steep slopes, and/or have deep foundations that reduce the effects of earthquake induced slope instability.

Past construction activities that were associated with the project (e.g., creating construction work sites, rehabilitating access roads, and establishing stringing sites and laydown areas) resulted in disturbance of approximately 16.68 acres of soils. Erosion control measures included in the project construction Stormwater Pollution Prevention Plan (SWPPP) were implemented to minimize soil erosion. In addition, approximately 324 cubic yards of soil were transported off-site.

Project components that were previously constructed are located in areas subject to precipitation- or seismically-induced slope instability (see PEA Figure 4.6-2). Site-specific subsurface borings and laboratory analysis were conducted prior to construction. Portions of project Segments 1 and 2 within Little Simi Valley, and project Segment 2 within Santa Rosa Valley along Coyote Creek, are mapped as liquefaction hazard zones and are anticipated to have a similar risk of lateral spreading where slopes are present.

Potential impacts associated with the risk of landslides, liquefaction, and lateral spreading were reduced through the design and siting of project components as follows:

- Project TSPs are not located on mapped landslides that could be subject to renewed movements during an earthquake event. Further, the hillside areas of the project are rated primarily with low susceptibility to earthquake induced landslide instability, with a few areas with steep natural slopes rated with moderate susceptibility (see PEA Figure 4.6-2). Due to siting and design constraints, as well as access and constructability factors, TSPs are generally not located on steep slopes, and/or have deep foundations, which reduce the effects of earthquake induced slope instability.
- Project TSPs located in potential liquefaction zones in the Little Simi and Santa Rosa valleys have been designed with large diameter, relatively deep, single (mono) foundations. Settlements induced by dynamic (earthquake) forces are anticipated to be uniform for mono foundations, and therefore use of these foundations reduces the potential for differential settlements and other adverse effects including loss of functionality, or risk of injury or loss of life.
- Lateral spreading is a secondary effect of seismically-induced liquefaction where blocks of ground move down slopes or toward an open face such as a stream bank or manufactured channel. Project TSPs sited in areas with liquefaction potential are not sited in proximity to open faces, and therefore the potential for damage due to lateral spreading is not high.

No areas of subsidence or soil collapse are known within the project area, nor are any expected to occur based on review of published soil data. SCE designed and located project components to minimize the potential effects from expansive soils. Because the effects of expansive soils are most realized at shallow depths, the deep foundations of TSPs and the burial depths of LWS poles resulted in these poles not being susceptible to the effects associated with expansive soils.

2.4.8 Greenhouse Gas Emissions

Past construction activities resulted in short-term construction emissions of greenhouse gas (GHG) emissions during the October 2010, through November 2011 period. Past activities generated exhaust emissions from vehicular traffic, as well as from construction equipment and machinery. Short-term GHG emissions from the project were estimated to be approximately

635 metric tons of carbon dioxide equivalent (MTCO₂e) over the October 2010 through November 2011 period. GHG emissions from past construction activities, amortized over 30 years, would be approximately 21 MTCO₂e per year. According to the PEA, past construction activities also did not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

2.4.9 Hazards and Hazardous Materials

No acutely hazardous materials (as defined in Title 22 California Code of Regulations (CCR) §66260.10) were used or stored on location during past construction activities. Hazardous materials that were used during past construction activities included gasoline, diesel fuel, oil, solvents, and lubricants associated with construction equipment and other vehicles and construction activities. These materials were transported, used, and disposed of in accordance with applicable laws, regulations, and SCE protocols designed to protect the environment, workers, and the public. No contaminated soil was encountered during excavation or other ground disturbing activities.

Reasonably foreseeable upset and accident conditions during past construction activities included minor spills or drips. Best management practices (BMPs) were implemented during past construction activities to reduce the potential for or exposure to accidental spills or fires involving the use of hazardous materials. The effects of such incidents were minimized by thoroughly cleaning up minor spills as soon as they occurred. A construction SWPPP was developed and implemented to ensure quick response to minor spills. The SWPPP identified the locations for storage of hazardous materials during past construction activities, as well as protective measures, notifications, and cleanup requirements for an accidental spill or other potential release of hazardous materials. Further, the SWPPP included good housekeeping BMPs and waste management BMPs that were implemented and inspected on a regular basis, as required by the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order 2009-0009-DWQ, as amended by Order 2010-0014-DWQ, to ensure BMP effectiveness at the project sites during past construction activities.

There are three schools located within 0.25 mile of components of the project. Hazardous materials used during past construction of the project consisted of limited quantities of low-toxicity materials including gasoline, diesel fuel, oil, solvents, and lubricants associated with the construction equipment and vehicles and construction activities. In addition, substation related work completed as part of the project necessitated the removal of equipment including relays and capacitors that contained hazardous materials. All hazardous materials were stored, handled, and used in accordance with applicable regulations. No acutely hazardous materials (as defined in Title 22 CCR §66260.10) were used or stored on location during past construction activities.

Based on field conditions and SCE personnel's knowledge of historical and current use of lands in the vicinity of the project sites, there were no indications that hazardous waste had been generated or stored at or along any component of the project. No past construction activities were located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

No past construction activities were located within an area covered under an airport land use plan. There were no public airports or public use airports within 2 miles of any past construction activity, nor were there private airstrips within the vicinity of any past construction activities.

Past construction activities did not considerably impact traffic circulation or increase demands on existing emergency response services, and did not impact emergency access in the area. SCE coordinated with local authorities regarding appropriate procedures to ensure that access road blockages were temporary and intermittent and that the roads remained available for use in case of emergency. There was no blockage of public roadways during past construction.

Vegetation at construction areas and along access roads were cleared and maintained to avoid the potential for ignition. During past construction activities, SCE implemented fire prevention protocols. When Red Flag Warnings were issued by the National Weather Service, SCE implemented measures to address smoking and fire rules, storage and parking areas, use of gasoline-powered tools, use of spark arresters on construction equipment, road closures, use of a fire guard, fire suppression tools, fire suppression equipment, and training requirements.

2.4.10 Hydrology and Water Quality

2.4.10.1 Violation of Water Quality Standards

Past construction activities included ground-disturbing activities in erosion-prone areas that could have increased soil erosion rates, with the potential to result in exceedances of water quality standards and impacts to beneficial uses in adjacent water bodies. Soil disturbance adjacent to streams within the project vicinity could have had adverse effects on water quality, including in Calleguas Creek, which does not currently meet water quality standards for turbidity. Rehabilitation of access roads and the development of spur roads and equipment pad/turnaround areas in erosion-prone areas could have resulted in soil loss and sedimentation.

However, to minimize soil erosion and resulting impacts on water quality, SCE complied with state stormwater regulations. Past construction activities were completed under the State Water Control Resources Board, National Pollution Discharge Elimination System Construction General Permit (Construction General Permit, SWRCB Order 2009-0009-DWQ as amended by 2010-0014-DWQ) and an approved SWPPP (WDID# 4 56C359579). BMPs identified in the SWPPP were utilized to address sediment discharge and erosion control to meet water quality standards.

Past construction activities did not involve discharges of domestic sewage. Temporary sanitary facilities were provided during past construction activities; these facilities were serviced by a licensed contractor and all wastes disposed of according to applicable regulations. With the implementation of BMPs from the SWPPPs required under the Construction General Permit, the project did not cause a violation of water quality standards.

2.4.10.2 Groundwater Depletion

Past construction activities did not involve direct extraction of groundwater. SCE used water during construction for dust control and other purposes including site rehabilitation and revegetation-related work. This water was obtained from providers who use both surface and groundwater. Given the small volume of water used during past activities (which totaled less than 1 acre-foot, including water used for rehabilitation and revegetation activities), the project did not substantially deplete groundwater supplies in the area.

Past construction activities did not substantially interfere with groundwater recharge. The past activities did not alter the course of a stream or river in any way that affected groundwater recharge. The TSP concrete foundations are impervious; each foundation is approximately 6 to 8 feet in diameter. A total of 28 TSP foundations were constructed along the length of the project during past construction activities; these foundations are widely spaced, and as such, the presence of these foundations has not resulted in an increase in impervious surface that could substantially affect groundwater recharge. New spur roads were constructed from pervious local soils, and did not substantially interfere with groundwater recharge. Therefore, past construction activities did not cause a net deficit in aquifer volume or a lowering of the local groundwater table level.

2.4.10.3 Alteration of Drainage Patterns

Past construction activities included upgrading and replacing deteriorated drainage facilities during the rehabilitation of access roads. These drainage facilities, and facilities that did not require upgrades or replacement, were used during past activities. In addition, new spur roads were constructed in a manner that did not substantially alter existing drainage patterns. The development of construction pads resulted in minor localized changes in runoff volumes and velocities. However, in compliance with state stormwater regulations, SCE developed and implemented a SWPPP and erosion and sediment control plans with BMPs to minimize soil erosion.

During past project related grading activities, certain soils were inadvertently deposited by SCE on slopes below pole locations 38, 39, and 40. These activities altered the existing drainage patterns on and in the immediate vicinity of the slopes; however, substantial erosion or siltation did not occur either on- or off-site, and the areas were rehabilitated at the direction of CDFW. In addition, SCE obtained permits and complied with Ventura County flood control requirements for encroachments on ROWs of channels regulated by the Ventura County Watershed Protection District and for new structures in floodplains.

The project incorporated design features to control runoff rates, which minimized the chances of flooding receiving waters or causing sedimentation that would reduce their capacity. Through drainage design and implementation of stormwater BMPs during and after construction as required by existing regulatory programs, the project minimized the potential for flooding area streams and rivers.

2.4.10.4 Site Runoff and Other Water Quality Degradation

Site runoff was addressed through stormwater BMPs implemented in compliance with the Construction General Permit. This included the installation and/or upgrading of stormwater drainage systems along the project alignment. The capacity of these systems was designed to accommodate the maximum expected stormwater drainage from the project's sites. As such, the project did not create or contribute to runoff water which exceeded the capacity of existing or planned stormwater drainage systems or provided substantial additional sources of polluted runoff. During past construction activities, no additional sources of potential water degradation were identified beyond those previously discussed.

2.4.10.5 Flooding

Construction of the subtransmission line occurred within a Federal Emergency Management Agency (FEMA) designated 100-year flood hazard zone associated with Calleguas Creek (Conejo Creek, and Arroyo Los Posas and Arroyo Simi), but not within the active channel. However, the subtransmission structures did not alter drainage patterns and do not have a large cross section that would substantially impede flood flows. During construction, no dams or other temporary structures that could impede or redirect flow were required.

Project Segment 1 and the northern portion of project Segment 2 are located in the Wood Ranch Reservoir (Bard Lake) failure inundation path. However, these project segments are located at the far end of the inundation path, and past construction work did not expose workers to a substantial risk of loss, injury, or death involving flooding from the failure of the reservoir's dam.

Construction work adjacent to tributaries to Calleguas Creek was conducted in identified flood zones. However, past construction activities were conducted during the dry season to the extent feasible, and were halted on account of weather when necessary, and thus did not expose people or structures to a risk of loss, injury, or death involving flooding.

2.4.10.6 Exposure to Inundation by Seiche, Tsunami, or Mudflow

According to the California Emergency Management Agency, all components of the project were located outside of a mapped tsunami hazard zone. The nearest water body in which a seiche could occur is the Wood Ranch Reservoir (Bard Lake) in Simi Valley. The past construction activities occurred more than 4 miles from the reservoir, and thus was not susceptible to a seiche.

Therefore, due to the location of past construction activities, and because these activities did not involve construction of residences or other land uses involving human occupancy, there was no risk of loss, injury, or death from tsunamis or seiches.

The project was routed through areas that may have been susceptible to mudflows. However, past construction activities did not involve the development of residences or other structures or facilities designed for human occupation. Additionally, construction work was halted on account of weather when necessary, and no mudflows in the project area occurred during past construction activities.

2.4.11 Land Use and Planning

Past construction activities occurred within substation boundaries or within existing utility ROWs that have been in existence for several decades. Areas designated and zoned for residential uses are located to the south of the Moorpark Substation, to the east of portions of project Segment 2, and in the vicinity of Newbury Substation; no construction occurred on these lands. Past construction activities at any given site were of short duration and intermittent. The entire past construction period lasted only 14 months. Construction of the subtransmission structures, installation of overhead conductor, and substation modifications did not physically divide an established community.

Past construction activities occurred within existing SCE utility ROWs within the City of Moorpark, City of Thousand Oaks, and unincorporated Ventura County. Electric transmission lines are recognized as exempt from the zoning ordinance in the City of Thousand Oaks, are a permitted use in the City of Moorpark, and are a permitted use in Open Space, Agricultural, and Residential zones in Ventura County. Therefore, past construction activities were consistent with these plans and associated policies. For COSCA-managed lands, the Conejo Canyons Open Space Management Plan identifies the current location and easements for SCE's transmission lines. Because the past construction activities associated with the project took place within existing ROWs within the Management Plan area, the past construction activities were consistent with the Management Plan.

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans applicable to the lands crossed by the project. Project Segments 3 and 4 traverse lands managed by COSCA; the management of these lands are guided by the Management Plan. Although the Management Plan is neither a defined Habitat Conservation Plan nor a defined Natural Community Conservation Plan, the Management Plan was prepared by COSCA in order to inventory the resources in the plan area, identify challenges and opportunities in managing these resources, and suggest actions to be taken for the long-term management and environmental sustainability of the land and resources within the Conejo Canyons area. SCE has an easement through this area that allows construction and maintenance activities associated with the existing utility corridor. The Management Plan acknowledges the presence of the utility corridor. SCE, as the easement-holder, coordinated with COSCA regarding past construction activities.

2.4.12 Mineral Resources

As indicated by previous oil and gas exploration in the vicinity of the project area, these resources may be present in the subsurface of the project area. Portions of the project area are categorized as MRZ-3, for the presence of mineral resources and aggregate of undetermined significance. Past ground-disturbing construction activities involved drilling holes for TSP foundations and the rehabilitation of some existing access roads and laydown areas, which resulted in relocation of soils and rock within the project area. Project activities were not located in an area known to contain or that is mined for rare or unique rocks or minerals. The past construction activities did not permanently preclude access or change the availability of any mineral resources. The past

construction activities did not result in the loss of availability of a known mineral resource that is locally important or of value to the region and the residents of the state.

2.4.13 Noise

Past construction activities included, among other activities, boring to obtain soil and rock cores, removing existing wood poles and replacing them with LWS poles, installing TSPs and foundations, installing conductor, relocating existing distribution and telecommunications facilities, and associated site preparation activities (e.g., road grading and work pad construction). Noise-generating construction activities generally occurred during daytime hours, Monday through Saturday. Some limited night work occurred in the vicinity of Newbury Substation, and SCE obtained a permit for this work from the City of Thousand Oaks. Construction noise A-weighted decibel (dBA) equivalent sound level (L_{eq}) contour distances SCE estimated for these activities are summarized in **Table 2-4** below.

**TABLE 2-4
POLE REMOVAL AND INSTALLATION NOISE CONTOUR DISTANCES**

| Construction Operations | Contour Distance (feet) | | | | |
|------------------------------------------|-------------------------------------------|-----------------|-----------------|-----------------|-----------------|
| | 75 dBA ¹ L_{eq} ² | 70 dBA L_{eq} | 65 dBA L_{eq} | 60 dBA L_{eq} | 55 dBA L_{eq} |
| Conductor Removal | 183 | 327 | 572 | 975 | 1,610 |
| Wood Pole Removal | 171 | 307 | 537 | 916 | 1,517 |
| TSP ³ Foundation Installation | 173 | 309 | 539 | 924 | 1,534 |
| TSP Assembly | 134 | 243 | 428 | 739 | 1,240 |
| TSP Erection | 132 | 239 | 420 | 726 | 1,219 |
| Conductor Installation | 204 | 364 | 630 | 1,067 | 1,757 |

NOTES:

- ¹ The A-weighted decibel (dBA) scale corresponds to the sensitivity range for human hearing. Noise levels capable of being heard by humans are measured in dBA.
- ² L_{eq} : The equivalent sound level, or the time-integrated continuous sound level, that represents the same sound energy as the varying sound levels, logarithmically averaged over a specified monitoring period.
- ³ The installation of TSPs generated more noise than installation of LWS poles or removal of LSTs. Therefore, because these noise contours are based on TSP installation related noise, they represent a conservative estimate of noise generated during past activities, including LWS pole installation.

SOURCE: SCE, 2013.

Construction activities conducted Monday through Saturday between the daytime hours of 7:00 a.m. and 7:00 p.m. are exempted from the noise limits established in the City of Moorpark municipal code. The City of Thousand Oaks municipal code limits construction to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. The completed construction operations generally occurred within this time period, and work conducted outside this time period was covered under a permit from the City of Thousand Oaks.

The County of Ventura limits temporary construction noise to 75 dBA L_{eq} for durations of up to 3 days. Under the construction scenarios analyzed in the PEA, the modeled 75 dBA L_{eq} noise contour distances range from 132 to 204 feet. No residential structures in Ventura County were

located within the 75 dBA L_{eq} noise contour. In addition, the construction activities at each location were conducted and staggered to ensure that the noise generated during construction did not exceed the 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.

A helicopter was used to install a single LWS pole in project Segment 4 in the City of Thousand Oaks. This activity occurred during the day, lasted less than 4 hours, and took place in an area characterized as open space. The type of light-duty helicopter used to install the LWS pole generated a sound exposure level (SEL) of 80 dBA to 85 dBA for an overflight at 1,000 feet elevation, which corresponds to an hourly L_{eq} of 44 dBA to 49 dBA at a 1,000-foot distance.

The existing ambient 1-hour L_{eq} noise levels in the project area were measured to range from 42 dBA to 74 dBA, and for purposes of this analysis it is assumed that the ambient noise levels at the time past activities commenced were consistent with these noise levels. The noise associated with past construction activities exceeded these ambient noise levels in the vicinity of project activities, and thus resulted in a temporary increase in ambient noise levels. Construction activities at any given site were short term, and thus did not represent a periodic increase in ambient noise levels. Due to the short-term and temporary nature of construction activities, and the limited number of noise sensitive receptors in the area, the increase in ambient noise levels was not substantial.

Past construction activities did not occur in an area within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, past construction activities did not expose workers to excessive noise levels attributable to a public airport or public use airport. There are no private airstrips located in the vicinity of the project. Therefore, the project did not expose workers to excessive noise levels attributable to a private airstrip.

2.4.14 Population and Housing

The number of workers that were employed to complete the past activities did not directly or indirectly induce population growth in the area. Construction activities were short-term and temporary, and occurred for approximately 14 months. During peak construction times, SCE had approximately 70 workers per day on-site. The labor demands of the past activities were met by existing SCE employees and contractors. The small number of positions required during the short construction phase did not directly or indirectly induce any population growth in the area.

The past activities did not indirectly induce an increase in population. The electrical subtransmission infrastructure that was constructed is needed to increase the reliability of existing service. It is not designed to facilitate or induce additional electrical consumption or population growth. In addition, the past activities did not include construction of any new infrastructure such as publicly-accessible roads that could induce population growth.

The past activities did not displace any existing housing or people. Project infrastructure was constructed within existing public ROWs, both across public ROWs and within existing SCE ROWs. There were no residences or housing located within these ROWs. Although residences

were and are located near portions of the project, the past activities did not displace housing or people, and did not necessitate the relocation or construction of replacement housing elsewhere.

2.4.15 Public Services

The past activities did not directly or indirectly induce any population growth, and thus did not create a population growth-triggered increase for police or fire services; an increase in school enrollment; or an increase in the use of libraries, hospitals, parks, or other public facilities that resulted in a lowering of acceptable service ratios, response times, or other performance objectives. Because service ratios, response times, and performance objectives were not reduced to an unacceptable level, past construction activities did not necessitate the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities to maintain acceptable service.

Past activities were undertaken in a high fire hazard area. Construction activities were conducted according to SCE health and safety protocols and applicable laws and regulations designed to protect workers and the public. Compliance with these protocols ensured that construction activities were conducted in a manner that minimized the risk of igniting fires, including wildland fires.

During the past activities, existing access roads (which may also function as fire roads in open space areas) were used by construction equipment to access construction sites. To minimize surface disturbances, in some instances drill pads or equipment pad/turnaround areas encompassed access roads that were within SCE's existing ROWs. Vehicle movements along, and use of, access roads were communicated to and coordinated with the appropriate agencies when applicable. Equipment placed on equipment pad/turnaround areas and drill pads were situated or attended to facilitate adequate emergency vehicle access should the need have arisen.

2.4.16 Recreation

During construction, local parks may have been used by workers during their lunch or break periods, although the short duration of construction activities and the small number of construction workers would not have resulted in a substantial increase in the use of existing parks or recreational facilities, nor would this infrequent, intermittent use have resulted in a substantial physical deterioration of the facilities.

Numerous multi-use trails and fire roads are located within the Conejo Canyons area. Some of these multi-use trails and fire roads were used by SCE as access roads and spur roads to access its subtransmission structures. Past project activities required the blading and/or grading, where appropriate, of the existing multi-use trails and fire roads used by SCE to access its facilities. During the construction period, recreational use of some segments of these trails was temporarily interrupted to ensure the safety of the public and workers. These interruptions were localized and of a short duration, lasting only as long as the construction activity, and warning signs were placed on the access roads to alert users to the presence of construction equipment. There are many other trails throughout the Conejo Canyons area that were not affected by past project

activities. These trails could have been utilized by any trail users displaced from trails affected by past construction activities. Neither the grading and/or blading of the trails utilized during past construction activities, nor the temporarily-increased use of these trails during construction, resulted in substantial or accelerated physical deterioration of the trails.

The limited increase in the use of parks and recreational facilities by workers during past construction activities did not result in either a substantial increase in the use of existing parks or recreational facilities or the occurrence or acceleration of substantial physical deterioration to existing parks and recreational facilities. Even while recreational use of existing access and spur roads was temporarily disrupted during construction, other trails were available in close proximity within the Conejo Canyons area.

Within the Conejo Canyons Open Space Management Plan area, the project includes facilities (access roads) that are also used for recreational purposes. These access and spur roads are identified as multi-purpose trails in the Management Plan. During past project activities, these existing dirt access roads were graded and bladed as needed to ensure the safe movement of construction equipment along the SCE ROW. In some cases, short spur roads were rehabilitated or reestablished to provide adequate access to structure installation or removal sites. These spur roads are short and dead-end at the subtransmission structures, and add no or little additional recreational value to the existing multipurpose trail system.

2.4.17 Transportation and Traffic

2.4.17.1 Performance Standards

Past construction activities included the movement of light, medium, and heavy-duty vehicles (including oversize vehicles such as cranes) over U.S. 101, SR 23, and SR 118, and local roads maintained by the cities of Moorpark and Thousand Oaks, and Ventura County. Some project related vehicles and equipment traveled from permanent and temporary staging yards to work sites in the morning, and returned to their points of departure in the evening. Some project equipment was left on-site overnight. Past construction activities generated a maximum of approximately 180 daily vehicle trips during construction of the project. The actual number of daily vehicle trips may have been lower depending on the daily construction schedule. The 180 daily vehicle trips was inclusive of each worker making two daily personal vehicle trips (one trip in the morning from home to a staging yards, and one trip in the reverse in the evening, for a total of 140 roundtrips per day). Due to the working hours of utility crews, the majority of these personal vehicle trips occurred outside the morning and evening peak hours.

The temporary increase in project-related traffic during construction accounted for a minimal increase over average daily volumes along the roadways and at the intersections in the vicinity of the project. Past construction activities did not require any permanent or temporary lane closures of public roads. Project related vehicle movements occurred at a number of intersections within the City of Moorpark and the City of Thousand Oaks. The small number of project-related vehicle movements, and the timing of those movements, did not result in the lowering of the existing level of service (LOS) at any intersection.

Based on the number of daily vehicle trips generated during past construction activities, and the fact that no permanent or temporary lane closures on public roads were required, the project did not create any inconsistency or conflict with an applicable plan, ordinance, or policy that establishes measures of effectiveness.

2.4.17.2 Level of Service Standards

The Ventura County Transportation Commission (VCTC) has adopted in the Ventura County Congestion Management Plan (CMP) a minimum LOS standard of E for the CMP road network. The majority of roads and intersections that were used by project-related traffic during past construction activities operated at an LOS of D or better. The exception is U.S. 101, which operated at an LOS of E or F. None of the roads or intersections used during past construction activities were identified in the CMP as experiencing unusual growth in average annual daily traffic volumes.

With the exception of U.S. 101, highways on which project related traffic traveled operated at or above the minimum acceptable level of service. Traffic counts on these roads indicate that there was excess capacity available for use that did not cause the LOS of the roadways to drop below the acceptable level. Because past construction activities of the project generated only 180 additional vehicle movements per day, it did not exceed the thresholds of significance for Ventura County.

Given the then-acceptable LOS of roads and intersections, and the small number of trips that were generated during past construction activities, the project did not alter the existing LOS or interfere with the performance standards of any applicable CMP or other standards established by the applicable jurisdiction.

2.4.17.3 Air Traffic Patterns

All past construction activities were conducted in an existing utility ROW where subtransmission and transmission structures were present. While portions of the ROW are located in an area covered by the departure procedures for Camarillo Airport, no subtransmission or other structures were constructed in a location that would require a change in the departure procedures, and thus no change in air traffic patterns occurred as a result of past construction activities.

Construction activities resulted in a short-term increase in air traffic levels, as a helicopter was used to install a single LWS pole in project Segment 4. This flight was coordinated with and subject to the regulations of the appropriate federal authorities.

2.4.17.4 Design Features or Incompatible Uses

No incompatible uses or construction or alteration of any public roads were included as part of past construction activities.

2.4.17.5 Emergency Access

Past project construction activities did not result in inadequate emergency access. All construction at substations was conducted within the fencelines of the facilities. Activities and construction vehicles did not reduce the dimensions of access roads or driveways, or block roads or driveways, and thus did not impair emergency access to substations.

Past subtransmission-related construction work did not require any permanent or temporary closure of travel lanes on public roadways, private roads, or driveways. Past construction work did involve the movement of oversize vehicles that could have affected emergency vehicle access to and through the project area. Oversize vehicle permits were obtained as applicable.

Vehicle movements along, and use of, access roads were communicated to and coordinated with the appropriate agencies. Equipment placed on equipment pad/turnaround areas and drill pads were situated to facilitate adequate emergency vehicle access.

2.4.17.6 Bicycle or Pedestrian Facilities

Past project construction activities did not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. While the past construction activities occurred over a 14-month period, construction activities in any given location occurred over a short time period. Past construction work was conducted on SCE-owned property and within existing ROWs. SCE obtained encroachment permits from the local jurisdictions and Caltrans, as appropriate, for construction activities that encroached upon any public ROW or easement.

2.4.18 Utilities and Services Systems

During the past activities, small volumes of domestic wastewater was generated during construction activity at the substations. The additional volume of wastewater generated at the substations during past activities was minimal and did not cause an exceedance of wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (RWQCB).

For subtransmission-related work along the project segments, portable toilets were provided on-site for workers during the construction phase according to California Occupational Safety and Health Act requirements. The portable toilets were serviced by a licensed contractor who disposed of the waste off-site in accordance with applicable requirements.

Past construction activities of the project did not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. This is because only small volumes of wastewater were generated by the project during past construction activities, and because only small volumes of water were required for dust control during the construction period.

Past construction activities did not require the development of large-scale impermeable surfaces that increased the amount of stormwater discharge from the site that required construction of new off-site stormwater drainage facilities or expansion of existing facilities. The only impermeable

surfaces installed as part of the past construction activities were 33 TSP foundations installed over an approximately 6-linear-mile area, and new concrete footings and conduit installed as part of the substation work. These new impermeable surfaces encompass an area of less than 1,700 square feet. Because the project disturbed a surface area greater than 1 acre, SCE obtained coverage under the Construction General Permit. As part of compliance with the Construction General Permit, SCE prepared a SWPPP and implemented BMPs. Some of these BMPs served the purpose of regulating the amount of stormwater discharged at past construction work sites.

SCE used water to support construction activities, including for minimizing emissions of fugitive dust and mixing concrete. Depending on the work location, the water used during the past construction activities was obtained from Ventura County Waterworks District No. 1, the California American Water Company, or the Camrosa Water District. Due to the small volume of water that was used, and the short duration over which water was consumed, the past construction activities did not require new or expanded entitlements.

Past project activities generated only small incremental volumes of domestic wastewater from the substations and from portable toilets that were provided on-site for workers during the construction phase. The portable toilets were serviced by a licensed contractor who retrieved wastewater and disposed of it off-site in accordance with applicable requirements.

Small volumes of construction related waste and removed infrastructure components required disposal during past project construction activities. This waste included wood power poles replaced during construction, short lengths of conductor or wire, excavated materials, and miscellaneous construction materials (e.g., pallets, strapping, packaging). SCE recycled all materials where feasible. Materials that could not be recycled were disposed of in accordance with all applicable federal, state, and local statutes and regulations. All treated wood poles removed for the project were returned to the staging yard, and either reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a RWQCB-certified municipal landfill. The existing capacity available at the landfills that served the project were adequate to accommodate the small volume of waste generated during the past construction activities. All solid waste generated by the project during past activities was handled in accordance with all applicable federal, state, and local statutes and regulations.

References – Background

Southern California Edison (SCE), 2013. *Proponent's Environmental Assessment for the Moorpark-Newbury 66 kV Subtransmission Line Project*, October 2013.

SCE, 2014. Data Request Response 2. DATA REQUEST SET A1310021 Moorpark-Newbury-ED-SCE-02, August 15, 2014, and Supplemental Responses submitted on October 7.

