Volume 1: Chapters 1 through 4

SOUTHERN CALIFORNIA EDISON'S PRESIDENTIAL SUBSTATION PROJECT CPUC A.08-12-023 SCH #: 2009021059

Final Environmental Impact Report (Response to Comments)

Prepared for: California Public Utilities Commission March 2013





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CHAPTER 1 Introduction

1.1 Purpose of this Document

The California Environmental Quality Act (CEQA) and its implementing regulations (the "CEQA Guidelines") require a lead agency to prepare and certify a Final Environmental Impact Report (EIR) before it may approve a project for which a Draft Environmental Impact Report has been prepared. This document and the September 2011 Presidential Substation Project Draft EIR (SCH No. 2009021059) together constitute the Final EIR for the Presidential Substation Project (the Proposed Project) proposed by Southern California Edison (Applicant).

On September 16, 2011, the California Public Utilities Commission (CPUC, the CEQA lead agency) released the Draft EIR on the Proposed Project for public review and comment. The Draft EIR was available for public review at public libraries located in the vicinity of the Project site, and online on the CPUC's website.

The Draft EIR describes the Proposed Project and its environmental setting; analyzes potential direct, indirect and cumulative environmental impacts related to the construction, operation, and maintenance of the Proposed Project; identifies impacts that could be significant; recommends mitigation measures, which, if adopted, could avoid or minimize such impacts; and identifies impacts that are expected to remain significant and unavoidable, even with the implementation of recommended mitigation measures. The Draft EIR also evaluates alternatives to the Proposed Project, including a No Project Alternative, as required by CEQA.

The public review and comment period duration for the Draft EIR began September 16, 2011, and ended October 31, 2011 and lasted for a period of 46 calendar days. The CPUC granted an extension of the review deadline, which ended on November 15, 2011. Therefore, the total duration of the Draft EIR public review period was 61 calendar days.

The CPUC held a public hearing on October 13, 2011, to accept comments on the Draft EIR from agencies, organizations, and individuals. The hearing was held at 6:30 p.m. at the Palm Garden Hotel, which is located at 495 North Ventu Park Road, Thousand Oaks, California. The CPUC provided notification of the public review period and the public hearing to: 1) public agencies; 2) adjacent property owners and occupants; and 3) organizations that had demonstrated particular interest in the Proposed Project. Oral comments were received at the October 13, 2011, public hearing and written comments were due by November 15, 2011. Some comments were received after the end of the comment period and were accepted.

This Final EIR will be used by the CPUC, in conjunction with other information developed in the CPUC's formal record, to act on the Applicant's Presidential Substation application for a Permit to Construct. Under CEQA, the CPUC will determine the adequacy of this Final EIR and, if adequate, will certify the document as complying with CEQA.

1.2 Project Overview

The purpose of the Proposed Project is to provide electrical distribution facilities to meet the forecasted electrical demands in the cities of Simi Valley and Thousand Oaks, as well as adjacent areas of Ventura County (Electrical Needs Area [ENA]). No electricity generation is proposed. The ENA is presently served by three of the 66/16 kilovolt (kV) distribution substations that are fed by the Moorpark 66 kV System. These three 66/16 kV distribution substations (Thousand Oaks Substation, Potrero Substation, and Royal Substation) (ENA substations) provide electrical service to approximately 60,000 metered customers and are presently at or near their operating capacity.

After construction of the Proposed Project, the ENA would be served by the ENA substations and the proposed Presidential Substation. The Proposed Project would construct a new 66/16 kV distribution substation (proposed Presidential Substation) and associated subtransmission lines (proposed subtransmission alignments), telecommunications connection, and 16 kV distribution getaways. The proposed Presidential Substation would be supplied by connecting to two existing 66 kV subtransmission lines, the Moorpark-Royal No. 2, and the Moorpark-Thousand Oaks No. 2 lines. The proposed subtransmission alignments would be located predominantly within 3.5 miles of existing right-of-way (ROW). The Proposed Project would be constructed and operated with two 66 kV source subtransmission lines and four 16 kV distribution getaways. The proposed Presidential Substation, an unstaffed and automated, 56 MVA, 66/16 kV low-profile distribution substation, would be constructed on a 5.4-acre site or acquired property in the City of Thousand Oaks near the eastern boundary of the City of Simi Valley.

1.3 Organization of Final EIR

As required by CEQA Guidelines Section 15132, the Final EIR consists of the following elements:

- (a) The Draft EIR or a revision of the draft;
- (b) Comments received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies that commented on the Draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the lead agency.

The Final EIR for the Proposed Project contains information in response to concerns that were raised during the public comment period (September 16, 2011 through November 15, 2011).

Responses were prepared for each comment received during the public comment period and are presented in Chapter 3.

This Response to Comments document is separated into two volumes.

Volume 1 consists of four chapters.

- **Chapter 1** is an introductory chapter that describes the purpose as well as the organization of the Final EIR, and provides a brief description of the Proposed Project.
- **Chapter 2** describes the public review process, the organization of the comment letters and lists the commenters (agencies, organizations, individuals, and the applicant).
- **Chapter 3** contains copies of all the comment letters received on the Draft EIR as well as a copy of the transcript for the public meeting held on October 12, 2011, after publication of the Draft EIR. Individual comments are identified within the comment letter or transcript using an alphanumeric code. Following each comment letter are individual responses directed specifically to each comment. This chapter also contains master responses, which provide comprehensive discussions to respond to select sets of issues that received multiple comments. Each master response includes cross references to the individual comments being addressed, using the alphanumeric code within the comment letter or transcript.
- **Chapter 4** contains all text changes to the Draft EIR which includes both (1) changes to correct errors or to clarify information presented in the Draft EIR, and (2) text changes as a result of responding to comments, as shown in Chapter 3.

Volume 2: Appendices, provides supporting documentation for information presented in the Response to Comments Document. A digital copy of the Draft EIR, published September 2011, and this Response to Comments document is included on a compact disc (CD) at the end of this document.

1.4 Environmentally Superior Alternative

The Draft EIR identified System Alternative B as the Environmentally Superior Alternative. Upon further review, this alternative was deemed technically infeasible, and not capable of meeting reliability and flexibility objectives and therefore eliminated from consideration in the Draft EIR. The Final EIR therefore identifies a new environmentally superior alternative. As is discussed in Chapter 5 of the Draft EIR and Master Response 1, *Alternatives* in Section 3.1.1, no single alternative would provide an environmentally superior alternative to both the proposed substation site and subtransmission alignment environmental impacts. Therefore, a combination of alternatives from the Draft EIR would comprise the Environmentally Superior Alternative. The combination of Alternative Substation Site B with Alternative Subtransmission Alignment 3 was identified as second to System Alternative B in the Draft EIR and thus becomes the environmentally superior alternative in the Final EIR. This combination would reduce the permanent significant unavoidable impacts on aesthetics of the Proposed Project but would still result in significant unavoidable temporary impacts related to noise and air quality. See Chapter 5 of the Draft EIR and Master Response 1, *Alternatives* in Section 3.1.1 for more details.

CHAPTER 2 Public Review Process

This chapter lists the public agencies, organizations, and individuals who provided comments on the Draft EIR, provides copies of written comments received, and responds to those comments. As required by CEQA, these responses to comments address significant environmental issues raised (Pub. Res. Code §21091(d); CEQA Guidelines §§15088(a), 15132).

2.1 Opportunities for Public Comment on the Draft EIR

2.1.1 Notification

On September 15, 2011, the CPUC published and distributed the Notice of Availability (NOA) of a Draft EIR to advise interested local, regional, and state agencies, and the public, that a Draft EIR had been prepared and published for the Proposed Project. The NOA solicited both written and oral comments on the Draft EIR during a 45-day comment period (September 15, 2011 through October 31, 2011), and provided information on a forthcoming public comment meeting. The public review and comment period duration for the Draft EIR began September 16, 2011, and ended October 31, 2011. The CPUC granted an extension of the review deadline, which ended on November 15, 2011. Therefore, the total duration of the Draft EIR public review period was 61 calendar days. Additionally, the NOA presented the background, purpose, description, and location of the Project, as well as the contact name to request additional information about the Proposed Project.

In addition to the NOA, the CPUC notified the public about the October 13, 2011 hearing to receive comments on the Draft EIR through multiple newspaper legal advertisements and the Project website. The CPUC published legal advertisements in the Ventura County Star on September 19 and 24, 2011. The Ventura Star is a daily newspaper of general circulation in Ventura County. Additionally, an electronic copy of the NOA and the Draft EIR were posted on the CPUC's website at: http://www.cpuc.ca.gov/Environment/info/esa/presidentialsubstation/index.html. The NOA, newspaper legal advertisements, and the public meeting sign in sheets are provided in Appendices A, B, and C, respectively. Notifications provided basic Project information, the date, time, and location of the public hearing, and a brief explanation of the public hearing process. The public was encouraged in the NOA, newspaper legal advertisements, and the public meeting, to submit written comments and concerns regarding the Project and the adequacy of the Draft EIR by mail, facsimile, or email to the CPUC.

2.1.2 Public Comment Meeting

The CPUC held a public meeting on October 13, 2011, to accept comments on the Draft EIR from agencies, organizations, and individuals. The meeting was held at 6:30 p.m. at the Palm Garden Hotel, which is located at 495 N. Ventu Park Road, Thousand Oaks, California. The CPUC provided notification of the public review period and the public hearing to: 1) public agencies; 2) adjacent property owners and occupants; and 3) organizations that had demonstrated particular interest in the Project, e.g. through requesting a notice or participating in the scoping process. Oral comments were received at the October 13, 2011, public meeting and written comments were due by November 15, 2011. Some comments were received after the end of the comment period and were accepted.

A presentation (Appendix D) was given at the October 13, 2011 meeting that included an overview of the CPUC's decision-making process, including the environmental review process; the regional context; Project background; Project objectives; Project description; Project alternatives; and role of the public comments. Following the presentation, public comments were taken. All attendees were encouraged to submit written comments.

2.2 Comments on the Draft EIR

2.2.1 Written Comments

Numerous comment letters were received from both agencies and individuals during and after the Draft EIR review period. A total of 17 letters were received from agencies and two from organizations. A total of 38 were received from individuals. The Applicant submitted one comment letter and a table containing additional comments. The comment letters received on the Draft EIR are listed below in Section 2.4. Each comment letter has been assigned an alphabet letter and a comment number designating order of receipt within each of the categories identified above. Agency letters (including those from agencies and organizations) are designated with the letter "A," individuals' letters are designated by the letter "I," and those from the Applicant are marked as "SCE." For example, the second letter received from an agency was from the California Department of Transportation (Caltrans), and is identified as letter A2. Individual comments within letters are marked sequentially with numbers, such as I1, I2, etc. Comments from the Applicant are marked as SCE-1, SCE-2, etc. The Applicant also provided a comment table with suggested edits to the Draft EIR. Comments on this table are identified as SCE-T-X (where X is a number). Copies of all letters received are provided below in Section 3, Comments and Responses. A number of copies of a form letter were also received. These are responded to collectively in Letter I39 – Responses to Form Letter. Appendix E provides a list of the individuals who submitted comments via the form letter prior to the close of the comment period.

2.2.2 Public Meeting Comments

As noted above, a public meeting was held on October 13, 2011, at 6:30 p.m. at the Palm Garden Hotel. A transcript of oral comments made by individuals who spoke at the public meeting is

provided in Section 3.5 below. Oral comments are designated as "PH." Comments of the first speaker are designated PH-1, the second speaker's comments are designated PH-2, and so on. Speakers were encouraged to submit follow-up written comments so that the full text and intent of their comments could be documented and addressed. Written comments, if submitted, were assigned separate letter designations as shown in the table below.

2.3 Responses to Comments

As required by CEQA, the responses to comments provided in this chapter address significant environmental issues raised during the review period (Pub. Res. Code §21091(d); CEQA Guidelines §§15088(a), 15132). They are intended to provide clarification and refinement of information presented in the Draft EIR and, in some cases, to correct or update information in the Draft EIR. In some instances, the text of the Draft EIR has been revised in response to a comment, and the revised text is included as part of the response. Where responses have resulted in changes to the text of the Draft EIR, these changes are shown within the Draft EIR text using the following conventions:

- 1) Text added to the wording in the Draft EIR is shown in <u>underline</u>,
- 2) Text deleted from the wording in the Draft EIR is shown in strikeout, and
- 3) Text changes are shown in indented paragraphs.

These text changes also appear in Chapter 4, Revisions to the Draft EIR, of this document.

Some of the comments received on the Draft EIR did not address the adequacy or accuracy of the environmental analysis or did not identify any other significant environmental issue requiring a response; rather, these comments were directed toward the perceived merits or demerits of the Project, provided information, or expressed an opinion without specifying why the Draft EIR analysis was inadequate. The CPUC, as the CEQA lead agency, acknowledges the receipt of these types of comments; however, limited responses are provided to these comments as they do not relate to the adequacy or accuracy of the Draft EIR or otherwise raise significant environmental issues.

A number of written comments submitted on the Draft EIR raised the same or similar questions. Rather than repeat responses to such comments, the CPUC is providing a comprehensive discussion of the issues and related topics as Master Responses in Section 3.1. Individual responses to each of the comments received from agencies and organizations are provided in Section 3.2 and responses to comments received from individuals are provided in Section 3.3. Responses to comments received from the Applicant are provided in Section 3.4 and the transcript from the public meeting is in Section 3.5. Refer to the Master Responses for further detailed discussion and technical information as appropriate. The Master Response topics are summarized briefly below:

- Master Response 1: Alternatives
- Master Response 2: Non-CEQA Issues
- Master Response 3: Undergrounding

2.4 List of Commenters

Table 2-1 lists all who provided written or oral comments on the Draft EIR.

Comment Letter	Commenter	Date			
Agencies, Aj	oplicant and Organization – Written Comments				
A1	Native American Heritage Commission	September 26, 2011			
A2	California Department of Transportation, Dianna Watson, IGR-CEQA Program Manager	October 7, 2011			
A3	City of Simi Valley, Robert O. Huber, Mayor	October 11, 2011			
A4	California Department of Fish and Game, Daniel S. Blankenship, Senior Environmental Scientist	October 20, 2011			
A5	City of Moorpark, David A. Bobardt, Community Development Director	October 24, 2011			
A6	Santa Monica Mountains Conservatory, Paul Edelman, Deputy Director	October 26, 2011			
A7	Ventura County Air Pollution Control District, Laura Hocking and Dawnyelle Addison, Planning	October 24, 2011			
A8	Ventura County Board of Supervisors, Linda Parks, Supervisor 2 nd District	October 31, 2011			
A9	Ventura County Public Works Agency, Ben Emami, Engineering Manager II	October 18, 2011			
A10	Ventura County Planning Division, Andrea Ozdi, Land Conservation Act Planner	September 26, 2011			
A11	Ventura County Integrated Waste Management District, Derrick Wilson, Staff Services Manager	September 30, 2011			
A12	Ventura County Watershed Protection District, Tom Wolfington, P.E., Permit Manager	October 28, 2011			
A13	City of Simi Valley, Laura Funaiole	November 14, 2011			
A14	City of Thousand Oaks, Mark A. Towne, AICP, Deputy Director	November 15, 2011			
A15	Center for Biological Diversity, Jonathan Evans, Staff Attorney	November 15, 2011			
A16	sTTop, Charles Cronin, Co-founder	November 15, 2011			
A17	U.S. Fish and Wildlife Service, Diane K. Noda, Field Supervisor	November 28, 2011			
Individuals – Written Comments					
l1	Betty Evans	September 21, 2011			
12	Matt Anaya	October 13, 2011			
13	Dennis Broersma	October 13, 2011			
14	Deborah Cassar	October 13, 2011			
15	Jennifer Crandall, DDS	October 13, 2011			
16	Charles Cronin, sTTop	October 13, 2011			
17	Alison Merkel	October 13, 2011			
18	Laura Wilson	October 13, 2011			

TABLE 2-1 COMMENTERS ON THE PRESIDENTIAL SUBSTATION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Comment Letter	Commenter	Date		
Individuals – Written Comments (cont.)				
19	Kim Halizak	October 13, 2011		
l10	Louise Meisterling	October 13, 2011		
l11	Heidi Dauwalter	October 21, 2011		
l12	Dennis Broersma	October 25, 2011		
l13	Mercedes Todesco	October 26, 2011		
l14	Jennie Crowley	October 28, 2011		
l15	Donald Harrington, Electrical Engineer	October 28, 2011		
l16	Mr. and Mrs. Arnold P. Sodergren	October 30, 2011		
l17	Charlotte Watters	October 13, 2011		
l18	Jon and Sharon Fleagane	October 31, 2011		
l19	Martin A. Josephson, M.D.	October 13, 2011		
120	Gabriel and Silvia Scally	October 13, 2011		
l21	Mercedes Todesco and Family	October 29, 2011		
122	Reich Radcliffe and Kuttler LLP	October 31, 2011		
123	Jennifer Crandall, DDS	October 13, 2011		
124	Gary Morse	October 13, 2011		
125	Ginger Brandenburg	November 3, 2011		
126	Melinda Carmichael	November 13, 2011		
127	Chris Hansing	November 13, 2011		
128	Michele Flocks	October 13, 2011		
129	Margorie Herring	November 14, 2011		
130	Gaston Monast	November 14, 2011		
l31	Richard S. and Linnea E. Brecunier	November 10, 2011		
132	Michael Flocks	October 13, 2011		
133	Mercedes Todesco and Family	November 15, 2011		
134	Lily Wu	November 16, 2011		
135	Danila Oder	October 5, 2011		
136	Janet Richards	October 22, 2011		
137	Craig Underwood	October 24, 2011		
138	Charles Cronin, sTTop	November 15, 2011		
139	Form Letter	Various dates		
Southern Ca	Southern California Edison Comments			
SCE	Southern California Edison, Christine McCloud, Project Manager	November 15, 2011		
SCE-T	Southern California Edison, Christine McCloud, Project Manager	November 15, 2011		

TABLE 2-1 (Continued) COMMENTERS ON THE PRESIDENTIAL SUBSTATION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Comment Letter	Commenter	Date			
Public Heari	Public Hearing Comments				
PH1	Mary Benton	October 13, 2011			
PH2-7	Charles Cronin, sTTop	October 13, 2011			
PH8, 9	Mark Towne, City of Thousand Oaks, Deputy Director of Community Development	October 13, 2011			
PH10	Beth Kuttler	October 13, 2011			
PH11	Mark Cassar	October 13, 2011			
PH12, 13	Kim Halizak	October 13, 2011			
PH14	Corene Hansen	October 13, 2011			
PH15, 16	Mercedes Todesco	October 13, 2011			
PH17, 18	Craig Underwood	October 13, 2011			
PH19-22	Kristi Brumle	October 13, 2011			
PH23-31	Jennifer Crandall, DDS	October 13, 2011			
PH32-38	Andy Gossar	October 13, 2011			
PH39	George Pappas	October 13, 2011			
PH40	Rebecca Voskanian	October 13, 2011			
PH41	Georgette McBreen	October 13, 2011			
PH42,43	Gaston Monast	October 13, 2011			
PH44-46	Janet Richards	October 13, 2011			
PH47	Elizabeth Groden	October 13, 2011			

TABLE 2-1 (Continued) COMMENTERS ON THE PRESIDENTIAL SUBSTATION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

2.5 Final EIR

The Lead Agency (the California Public Utilities Commission), the project Applicant (Southern California Edison), and listed parties on the CPUC service list received a hard copy of the Final EIR. Other agencies, organizations, and individuals that submitted comments on the Draft EIR received a compact disc (CD) of the Final EIR. Individuals that submitted a form comment letter received a notice of availability of the Final EIR. Appendix F lists all recipients of the Final EIR. Appendix G contains the Certificate of Service.

CHAPTER 3

Comments and Responses

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3.1 Master Responses

3.1.1 Master Response 1: Alternatives

Summary of Commenters and Comments

Commenter	Comments Addressed by Master Response 1
City of Simi Valley	A3-3, A3-5, A3-6, A13-1
California Department of Fish and Game	A4-1
City of Moorpark	A5-1, A5-2, A53, A5-6
Santa Monica Mountains Conservancy	A6-1-2
Ventura County Board of Supervisors	A8-2
City of Thousand Oaks	A14-1 to 11, A14-14 to A14-18, A14-31
Center for Biological Diversity	A15-1, A15-3, A15-24, A15-42 to A15-63
STTOP	A16-1 to A16- 3, A16-5 to A16-9, A16-14, PH2
Betty Evans	11-3
Jennifer Crandall	I5-1, I5-15 to I5-18, PH25, PH30
Chuck Cronin	I6-1 to I6-4
Alison Merkel	17-1
Kim Halizak	I9-2 to I9-4, PH13
Louise Meisterling	110-1 to 110-2, 110-4
Heidi Daulwater	111-1, 111-2
Dennis Broersma 2	112-1
Jennie Crowley	114-1, 114-3
Donald Harrington	115-1
Arnold Sodergren	116-1
Charlotte Watters	117-4 to 117-6
Jon and Sharon Fleagane	118-1, 118-2, 118-9
Martin Josephson	119-1
Mercedes Todesco 2	I21-9, PH16
Valdez Kutter	122-1, 122-5, 122-6, 122-8, 122-9
Gary Morse	124-2
Ginger Brandenburg	125-1
Melinda Carmichael	126-4
Chris Hansing	127-2, 127-3, 127-6
Marjorie Herring	129-1, 129-3
Gaston Monast	I30-1, PH42, PH43
Richard and Linnea Brecunier	131-4
Michael Flocks	132-1
Danila Oder	135-1
Janet Richards	136-1

3.1 Master Responses

Commenter	Comments Addressed by Master Response 1
SCE	SCE1 to SCE22, SCE26, SCE29
Mark Towne	PH8
Beth Kuttler	PH10
Mark Cassar	PH11
Craig Underwood	PH18
Kristi Brumle	PH19, PH22
Andy Gosser	PH32, PH35, PH36,PH38
Elizabeth Groden	PH47

Summary of Issues Addressed in Master Response 1

A. Depth of Analysis of Alternatives

Comments received expressed concerns that additional detail or analysis was needed for the alternatives considered in the Draft EIR. This response defines the CEQA legal standard for analysis of alternatives.

B. Further Consideration of Alternatives

Based on information provided by SCE and others during the Draft EIR comment period, the feasibility of some alternatives evaluated in the Draft EIR has been considered further. This response describes the results of this more detailed evaluation and presents corresponding text changes to the Draft EIR.

C. Full Consideration of Alternative Subtransmission Alignment 4

Several commenters questioned why Alternative Subtransmission Alignment 4 was rejected from complete evaluation and consideration in the Draft EIR. This response discusses the reasons why full consideration of this alternative was not performed.

D. Environmentally Superior Alternative

Upon consideration of new information regarding the feasibility of System Alternative B from the Draft EIR, the alternative was eliminated from consideration. As a result, the selection of a new Environmentally Superior Alternative is necessary. This response describes the rationale for selection of the new Environmentally Superior Alternative, presents the selected alternative, and necessary text changes to the Draft EIR text.

E. Demand-side Management Alternative

Although a demand-side management alternative was considered and rejected in the Draft EIR (Section 3.5.8), commenters expressed support for this type of alternative. This response further discusses this type of alternative in context to the circumstances of the Proposed Project.

F. Consideration of Other Alternatives

Many commenters on the Draft EIR have requested the consideration of various other alternatives, including alternatives either considered or rejected by the Draft EIR or new alternatives not previously considered. This response describes the CEQA requirements for

the choice of alternatives and discusses the screening methodology used by the preparers of the Draft EIR.

G. No Project Alternative

A number of commenters have stated that the description and analysis of the No Project Alternative is incorrectly or inadequately analyzed in the Draft EIR. This response describes the CEQA requirements for consideration and analysis of the No Project Alternative and further discusses the No Project Alternative analysis in the Draft EIR.

H. Electrical Demand

A number of commenters expressed concerns related to the electrical demand for the Proposed Project based on the forecast demand needs for the ENA. This response addresses these concerns in the light of new data from SCE.

I. Load Rolling

Comments on the Draft EIR, recent testimony, and supplemental data including revised ENA load projections provided by SCE have identified the need to define and discuss the concept of "load rolling" within the electrical grid. This response defines load rolling and explains it in context to the Proposed Project and evaluated alternatives.

Response

A. Depth of Analysis of Alternatives

CEQA Guidelines Section 15126.6 (a)) states that:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

In order to comply with these requirements, each alternative to the Proposed Project considered in the EIR was evaluated in three ways:

- Did the alternative meet most basic project objectives?
- Was the alternative feasible (i.e. legal, regulatory, technical)?
- Did the alternative avoid or substantially lessen any significant effects of the Proposed Project, including consideration of whether the alternative itself could create significant effects potentially greater than those of the Proposed Project?

The objectives for the Proposed Project, as now modified¹ in this Final EIR, are as follows:

SCE's Proposed Project Objectives

• Meet long term electrical demand requirements in the <u>electrical needs area (ENA)</u> beginning in 2011 and extending beyond 2014 in order to meet 10 year planning

¹ See discussion of these modifications in Item B, below.

eriterion; as defined in the proponent's application, PEA, and supplemental information including revised ENA load projections;

- Improve electrical system operational flexibility and reliability by providing the ability to transfer load between 16 kV distribution circuits and distribution substations within the ENA;
- Meet project needs while minimizing environmental impacts; and
- Meet project needs in a cost-effective manner.

Basic Project Objectives – as defined by the CEQA Team

The CEQA team requested additional technical data from SCE and conducted an independent assessment to better define the basic objectives of the Proposed Project for use in the alternatives screening process. This information included data responses which are available to the public via the project website and some technical system data determined to contain critical energy infrastructure information and is therefore confidential. The basic project objectives identified by the CEQA team based on the technical data and additional analysis are:

- Meet long term electrical demand requirements in the ENA as defined in the proponent's application, and PEA, and supplemental information (SCE, 2008 and 2012a); and
- Improve electrical system operational flexibility and reliability by providing the ability to transfer load between 16 kV distribution circuits and 16k V distribution substations within the ENA.

The alternatives considered in the EIR were also intended to reduce the significant unavoidable (Class I) environmental impacts of the Proposed Project. These were:

- Aesthetics: Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views.
- Air Quality: Proposed Project construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Significant unavoidable impacts would result from the combined emissions associated with all components of the Proposed Project.
- Noise: Proposed Project construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria. Significant unavoidable impacts would result from the proposed subtransmission line, 16kV distribution line and telecommunications cable and access road construction activities.

The alternatives considered for full analysis in the Draft EIR (see Chapter 3, *Alternatives and Cumulative Projects* in the Draft EIR), met most project objectives and appeared feasible to the analysis team. They were analyzed by resource area in Draft EIR Chapter 4, and further analyzed in Draft EIR Chapter 5, *Comparison of Alternatives*, for their ability to avoid or less significant impacts of the Proposed Project.

Commenters raise concerns about the depth of the alternatives analyses contained in Chapter 4 of the Draft EIR. Per CEQA Guidelines, Section 15126.6(d):

"The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1)."

Draft EIR Chapter 3 provides a list, description, and map that identify alternatives to the Proposed Project. Each issue area section (Draft EIR Sections 4.1 through 4.16) presents both the environmental setting and the impact analysis for each alternative. As required by CEQA, in cases where an alternative would cause a significant impact, the impacts are discussed in the appropriate issue area section, but in less detail than the significant impacts of the Proposed Project (see, for example, the analysis of Alternative Subtransmission Alignment 1 in Draft EIR Section 4.1, *Aesthetics*, page 4.1-62 et seq.) Draft EIR Chapter 5 provides a summary of the collective impacts of each alternative in comparison with the impacts of the Proposed Project, including two tables that display the major characteristics and significant environmental effects of each alternative: Table 5-2, *Proposed Project vs. Alternatives, Summary of Environmental Impact Conclusions*; and Table 5-3, *Environmental Impacts Increase or Decreased by Implementing an Alternative*.

In this manner, the EIR satisfies the requirements pertaining to the evaluation of alternatives as required by CEQA.

B. Further Consideration of Alternatives

Elimination of System Alternative B from Full Analysis

Numerous commenters on the Draft EIR indicated that they preferred System Alternative B over the Proposed Project. System Alternative B was the only alternative carried forward for analysis in the Draft EIR which proposed to potentially reduce all significant unavoidable impacts (Class I) of the Proposed Project to less than significant by upgrading equipment within existing substations within the ENA. However, SCE provided comments concerning the technical feasibility of System Alternative B.

System Alternative B was developed by the CPUC and its consultants and included in the alternatives considered analysis section of the Draft EIR. The alternative called for the upgrade of

3.1 Master Responses

the three existing electrical needs area (ENA) substations with non-standard equipment, including the replacement of the existing 16.8 MVA transformers² with larger ones. These larger transformers would not be consistent with a standard SCE transformer sizing. It was understood that installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint and that additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment may need to be upgraded. The approximate size of these new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty. The Draft EIR acknowledged technical constraints and issues with System Alternative B, but carried it forward for analysis because it appeared to be capable of meeting project objectives and be potentially feasible.

Subsequent to publication of the Draft EIR, SCE provided technical comments (see Section 3.4) regarding the feasibility of a System Alternative B which used 25 to 30 MVA transformer sizing to replace the standard substation configurations. SCE commented that this alternative, as described in the Draft EIR, would not be physically feasible within the existing substation footprints. Due to space limitations at the three substations, there is not enough physical space at any of them to install a larger 30 MVA energized transformer to replace each of four 16.8 MVA energized transformers. Because the Draft EIR did not specify that four larger 30 MVA transformers, it was conceptualized that under System Alternative B, only three larger 30 MVA transformers would be installed. Under this configuration all four 16.8 MVA transformers would be removed. Regarding this potential System Alternative B configuration, SCE argued that this alternative would:

- 1. Involve additional modifications not disclosed in the Draft EIR to the Potrero, Thousand Oaks, and Royal substations, including fill and foundation work, expansion of the existing layouts, changes to switchgear and buses, new distribution circuits, and modification of 66 kV subtransmission lines within the ENA.
- 2. The non-standard design of the larger transformers proposed in the alternative would create operational safety problems for SCE in training of staff. SCE has indicated that its practice of standard transformer design at substations provides for safe operations during emergency conditions. Operationally this non-standard design would present maintenance problems for replacement and spare equipment as well as require longer lead times for replacement than standard SCE equipment.
- 3. The proposed larger transformers would require the 16 kV bank breakers short circuit duty to substantially increase, thereby requiring the replacement of the impacted breakers. SCE had additional concerns about procurement of this non-standard equipment, and estimated an additional 6 to 12 months to configure the existing substations for this design, if procurement is even is feasible
- 4. Finally, SCE stated that the alternative as proposed would not provide greater reliability or operational flexibility over the Proposed Project due to several factors including the

² Transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions.

additional time to design and manufacture these non-standard transformers, a reduced ability to shift loads within the ENA with only three substations, and a much more complicated distribution circuit switching regime when compared to standard transformers and the Proposed Presidential substation design.

SCE also provided some additional information concerning the existing transformers and further detail for their reasoning demonstrating why this alternative was not desirable (see Appendix H). Based on consideration of SCE's comments on the Draft EIR and review of the technical information provided by SCE, the CPUC has determined that the conversion to 25 to 30 MVA transformers (or other similar sized transformers) is no longer a technically feasible alternative to the Proposed Project capable of meeting reliability and flexibility project objectives. This determination was based on SCE staff safety concerns from the non-standard transformer designs and limited space; increased costs and time to implement this non-standard design as well as operational cost and concerns for maintenance and replacement of these transformers; the overall effect of the reduction to system reliability and flexibility of the alternative to the Proposed Project; and the potential for new environmental impacts from the additional distribution circuits and conductor upgrades to the 66 kV lines. As a result of the elimination of System Alternative B a new Environmentally Superior Alternative was needed for consideration in the EIR. This is discussed in greater detail in Item D below.

With the elimination of System Alternative B from further consideration, the following text changes have been made to the Draft EIR:

Page Change

ES-1 Under the heading **ES.1 Introduction / Background**, the last sentence of the third paragraph has been amended as follows:

Based on this evaluation and the documentation which follows, this Draft EIR identifies <u>a combination of Alternative Substation Site B with Alternative</u> <u>Subtransmission Alignment 3</u> System Alternative B as the Environmentally Superior Alternative.

ES-13 The discussion of System Alternative B has been removed:

System Alternative B

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16

kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment could need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.

Rationale for Full Analysis

This alternative would meet the basic project objectives. It would also meet all legal, regulatory and technical feasibility criteria. This alternative would eliminate significant impacts on noise, air quality and aesthetic resources.

ES-18 The System Alterative B row has been removed from Table ES-2 Summary of Significant Unavoidable (Class I) Environmental Impacts:

System Alternative B Aosthotics – loss than significant. Class I aesthetic impacts would be oliminated.

Air Quality – loss than significant: Construction impacts in Ventura County associated with potential violation of ozone air quality standards and cumulatively considerable levels of NOx.

Noise – loss than significant short-term construction impacts: Class I noise impacts in Ventura County would be eliminated. Unlike the Proposed Project and Alternative Substation Site B, this alternative would result in long-term operational impacts at the Thousand Oaks Substation. However, these impacts would be mitigated to less than significant.

3-4 Under the heading **Basic Project Objectives – as defined by the CEQA Team**, the last sentence of the fourth paragraph as been revised as follows:

Reliability decreases the longer the distance the two 66 kV source lines are routed within the same ROWright of way (ROW).

3-9 The following row has been deleted from **Table 3-2 Summary of Alternative Screening** Analysis:

Alternative			Feasibility Criteria	Environmental Criteria
Substation Site Subtransmission Alignment		Project Objectives Criteria		
System Alternative B Upgrading existing substation sites using non- standard transformer sizes Replaces existing transformers with larger transformers to increase the capacity of existing substations. Requires change to non- standard equipment	Additional 66 kV subtransmission lines would not be required.	Moots most project objectives	Meets feasibility criteria	Meets environmental criteria, although may result in different types of impacts than the Proposed Project.

Alternative				
Substation Site	Subtransmission Alignment	Project Objectives Criteria	Feasibility Criteria	Environmental Criteria
System Alternative B – Upgrading existing substations using non- standard transformer sizes • Replaces existing transformers with larger transformers to increase the capacity of existing substations. • Requires change to non- standard equipment • Additional 16 kV distribution circuits needed	Some possible upgrades to existing 66 kV subtransmission lines may be required.	Fails. While in theory this alternative would meet some of the project objectives, based on technical analysis data from SCE this alternative is not viable due to concerns of safety, operability, and system reliability. In addition, these upgraded substations would be non-standard designs that would present problems for emergency workers.	<u>Fails to meet</u> <u>feasibility criteria.</u>	<u>Meets</u> <u>environmental</u> <u>criteria.</u>

3-13 The following row has been added after Alternative Substation Site G in Table 3-2 Summary of Alternative Screening Analysis:

- **3-14** Under the heading **3.3.1** Alternatives Analyzed in the EIR, the last bullet point has been removed:
 - System Alternative B Upgrade existing substations by replacing existing transformers with larger units.
- **3-16** Under the heading **3.3.2** Alternatives Eliminated from EIR Consideration, the following bullet point have been revised:
 - Alternative Substation SideSite E and subtransmission alignment
 - <u>System Alternative A Increase capacity of existing substations using</u> standard transformer sizes
 - System Alternative B Upgrade existing substations by replacing existing transformers with larger non-standard units.

3-16 Under the heading **3.4 Alternatives Evaluated in this EIR**, the first and second paragraphs have been amended as follows:

Alternatives analyzed in this EIR include one alternative substation site, <u>and</u> three alternative subtransmission alignments. and one system alternative. System Alternative B and the <u>The</u> No Project Alternative are<u>is a</u> stand-alone alternatives and the evaluation of environmental effects is comprehensive.

3.1 Master Responses

Any alternative involving construction of a new substation would also require construction of two 66 kV subtransmission lines to supply the substation. In order to comprehensively consider the environmental effects of the Alternative Subtransmission Alignments (1, 2, and 3) the effects of constructing a new substation need to be considered as well. Specifically, Alternative Subtransmission Alignments 1, 2, 3 and the proposed subtransmission alignment would all be capable of supplying a new substation at either the proposed Presidential Substation site or Alternative Substation Site B with minor modifications. This results in seven six different alternative combinations, plus System Alternative B, and athe No Project Alternative for a total of nineseven alternatives analyzed.

3-16 Under the heading **3.4 Alternatives Evaluated in this EIR**, the following bullet point has been removed:

System Alternative B

3-24 Under the heading **3.4.5 System Alternative B – Upgrade Existing Substations with** Non-Standard Equipment, the following text has been removed:

3.4.5 System Alternative B – Upgrade Existing Substations with Non-Standard Equipment

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment could need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.¹

Rationale for Full Analysis

Project Objectives

This alternative would meet most of the project objectives but the operational flexibility and reliability would be less than under the Proposed Project.

Replacement of the existing transformers at one of the substations would temporarily reduce the reliability of the system as existing transformers are taken off line for replacement. If the transformer change out is accomplished during the non-summer period, reliability issues could be minimized or eliminated.

Feasibility

This alternative would meet all regulatory and technical feasibility criteria. No additional land or ROW acquisitions would be required under this alternative.

Lessen Significant Environmental Impacts

System Alternative B would not require the construction of a new substation and associated subtransmission or 16 kV distribution lines. Impacts on air quality, noise and aesthetics would be less than significant.

Potential New Impacts Created

The equipment used at these three substations may not be consistent with standard SCE substations and therefore it may not be as efficient for SCE to replace or repair equipment from existing stocks. Consequently, the time necessary to replace broken equipment or acquire parts to repair, may take longer, resulting in potential impacts on utility service (i.e. brown/black outs).

Thousand Oaks Substation is located near residences. Increasing transformer sizes would increase noise associated with the operation of the substation. However, transformers could be built to mitigate noise to less than significant levels.

Larger transformers would increase the visual profile of the substations. Because these are already industrial sites, the impact of an increased profile would be less than significant.

3-26 Under the heading **3.5** Alternatives Eliminated from Full EIR Evaluation, the text in the first paragraph has been amended as follows:

As discussed in Section 3.1, alternatives were assessed for their ability to reasonably achieve the basic project objectives and reduce the significant environmental impacts of the Proposed Project. Also, their technical, legal, and regulatory feasibility were evaluated. Based on these screening criteria, the alternatives eliminated from EIR consideration are listed above in Section 3.3.2. The rationale for <u>eliminationeliminating</u> each alternative is presented below.

- **3-36** Under the heading **Potrero Substation Upgrades**, the following has been added after the second bullet:
 - Upgrade the existing transformer breakers and leads (work internal at the substation); and

3-27 Under the heading **Rationale for Elimination**, the text has been amended as follows:

This alternative does not meet the basic project objective of meeting long-term projected electrical load requirements in the ENA (SCE, 2012c). The alternative would add 16.8 MVA of additional capacity which is not sufficient to meet need beyond 2014 <u>electrical needs of the ENA and would require significant changes to SCE electrical infrastructure beyond the ENA (SCE, 2012c)</u>. Consequently, this alternative would require construction of a new substation in the future.

3-37 The follow section has been added on page 3-37, following Section **3.5.7**:

<u>3.5.8 System Alternative B – Upgrade Existing</u> Substations

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment may need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.³

Rationale for Elimination

As originally described in the Draft EIR (September 16, 2011), System Alternative B proposed upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers with larger ones. There would not be enough physical space within any of the substations to accommodate the replacement of four 16.8 MVA transformers with four 30 MVA transformers. For this reason a System Alternative B involving installation of four 30 MVA transformers at each substation was deemed not technically feasible.

³ The ability of a piece of electrical equipment to withstand abnormally high electrical current generated as a result of a short circuit. Electrical currents in excess of the short circuit duty can damage equipment leading to wide spread electrical system failure.

Additionally, it was conceptualized that System Alternative B could involve the replacement of four 16.8 MVA transformers with three larger 30 MVA transformers to increase capacity at each substation. System Alternative B would involve replacing the existing transformers with larger ones at the Potrero, Thousand Oaks, and Royal substations, including fill and foundation work, expansion of the existing layouts, changes to switchgear and buses, new distribution circuits, and modification of 66 kV subtransmission lines within the ENA. Based on additional understanding of the technical requirements of this alternative, this version of System Alternative B was also determined to be technically infeasible and incapable of achieving reliability and flexibility objectives. As described in the Draft EIR alternative, the approximate size of the new transformers would be in the 25 to 30 MVA range depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty. Comments received from SCE on the 2011 Draft EIR resulted in a re-examination of the feasibility of System Alternative B. SCE commented that this alternative would reconfigure the existing substations and create numerous technical problems within the ENA (detailed in Section 3.4, Comments SCE-8 through SCE-16). SCE provided additional information concerning the existing transformers to demonstrate why this alternative was not feasible (see Appendix H in the Final EIR for additional information). SCE's comments and supporting information are summarized below.

- 1. <u>The larger transformers would not be consistent with a standard SCE</u> <u>transformer sizing and it was recognized that installing larger transformers</u> <u>could require the replacement of some existing 16 kV distribution equipment</u> <u>located inside and outside of the substation footprint.</u>
- <u>The non-standard design of the larger transformers proposed in the</u> <u>alternative would create operational safety problems for SCE in training of</u> <u>staff. SCE has indicated that its practice of standard transformer design at</u> <u>substations provides for safe operations during emergency conditions.</u> <u>Operationally this non-standard design would present maintenance problems</u> <u>for replacement and spare equipment as well as require longer lead times for</u> <u>replacement than standard SCE equipment.</u>
- The proposed larger transformers would require the 16 kV bank breakers short circuit duty to substantially increase, thereby requiring the replacement of the impacted breakers. SCE had additional concerns about procurement of this non-standard equipment and estimated an additional 6 to 12 months to configure the existing substations for this design, if procurement is even feasible.
- 4. <u>Finally, SCE stated that the alternative, as proposed, would not provide</u> <u>greater reliability or operational flexibility over the Proposed Project due to</u> <u>several factors, including the additional time to design and manufacture these</u> <u>non-standard transformers, a reduced ability to shift loads within the ENA</u> with only three substations, and a much more complicated distribution circuit

switching regime when compared to standard transformers and the proposed Presidential substation design.

Additional detail demonstrating why this alternative is not feasible is included in Appendix H in the Final EIR. Based on the further consideration of System Alternative B in light of clarifying technical information provided by SCE, the CPUC has determined that the conversion to 25 to 30 MVA transformers (or other similar sized transformers) is not a technically feasible alternative capable of achieving reliability and flexibility objectives of the Proposed Project.

3-37 The subheading numbers for subsections 3.5.8 and 3.5.9 have been updated as follows:

3.5.8<u>3.5.9</u> Non-Wires Alternative – Demand Management Conservation

3.5.9<u>3.5.10</u> Non-Wires Alternative – Renewable or Conventional/ Distributed Generation Energy Resources

- **3-46** Under **References-** Alternatives and Cumulative Projects, the following references have been updated or added:
 - SCE, 2011a. Southern California Edison. Comments on the Draft EIR. November 15, 2011.
 - SCE, 2011<u>b</u>. Southern California Edison, Environment: Committed to Environmental Protection, www.sce.com/PowerandEnvironment/default.htm, accessed September 6, 2011.
 - SCE, 2012a. Southern California Edison. Data Response ED-08, number 5, March 19, 2012.
 - SCE, 2012b. Southern California Edison. Data Response ED-09, July 17, 2012.
 - SCE, 2012c. Southern California Edison. Data Response ED-10, September 20, 2012.

In addition, all references to System Alternative B have been struck from the issue area analyses in Draft EIR Chapter 4. See Final EIR Chapter 4 for all corresponding text changes. Regarding text changes to Draft EIR Chapter 5 regarding the Environmentally Superior Alternative, see Item D, below.

Elimination of Revised System Alternative B from Full Analysis

As described in the section above, based on technical clarifications provided by SCE, the CPUC found System Alternative B as presented in the Draft EIR to be technically infeasible, under both four and three 30 MVA transformer scenarios (at each substation). Subsequent to that

determination, the CPUC conducted an examination of potential revisions to System Alternative B in order to explore other potentially feasible "system" alternative configurations. Specifically, the CPUC attempted to develop an alternative which would not require construction of a new substation within the ENA, through upgrades and modifications to the existing ENA substations. The result of this effort was a Revised System Alternative B which included installation of a third bank of transformers of the same size and design as the existing banks at each of the existing ENA substations. This would result in the addition of up to three transformer banks within the ENA thus potentially resulting in a significant increase in the ENA transformer capacity and would consist of one new back to back transformer bank each rated at 28 MVA per transformer or 56MVA per substation at located at the Potrero, Thousand Oaks, and Royal substations and necessary infrastructure upgrades/changes. As proposed, the revised alternative had the potential to increase existing ENA substation capacity from 336MVA to 504MVA.

The CPUC requested additional information from SCE on possible scenarios for a revised System Alternative B. SCE provided Data Responses 8 and 9 to address CPUC questions on the revised System Alternative B (see Appendix H). Based on conceptual engineering data provided by SCE (SCE, 2012a), SCE identified System Alternative B as having potential problems with: 1) safety issues in the substation's 16 kV switchrack configuration necessary to accommodate the switchrack within the existing substation footprints, 2) crew training related to the use of nonstandard substation configurations, 3) potential short circuit issues with the 16 kV circuit breakers, 4) potential load issues with the 66 kV switchrack configuration at Potrero substation in particular during summer, and 5) a nonstandard design substation that would, in SCE's estimation, cause delays during emergency power outages for emergency crews due to operation of non-standard designs. SCE also indicated that the existing property at the three ENA substations would be adequate for the substation equipment (such as the new transformer banks), but that additional property and easements for the ROW may be required to support the 66 kV subtransmission line modifications and/or 16 kV distribution circuits into and out of the substations. SCE's data also showed that there is a potential for new environmental impacts from construction activities to achieve a revised System Alternative B.

As a result of this supplemental information from SCE (see Appendix H), the CPUC has concluded that System Alternative B in either its formation in the Draft EIR or this variant discussed above are not feasible, and has eliminated them from further consideration in the EIR. The result is that a System Alternative is not a technically feasible alternative and therefore cannot be considered for approval by the CPUC.

System Alternative A Reexamination

System Alternative A was originally provided by SCE in its Proponent's Environmental Assessment (PEA), as System Alternative 2 and read as follows: "Upgrade Potrero Substation and Royal Substation by replacing existing transformers and 16 kV station capacitor banks with higher capacity equipment, and adding additional 16 kV circuits. Thousand Oaks Substation is presently at full build-out and cannot accommodate additional transformers," (SCE, 2008). The PEA went on to describe it as follows:

"System Alternative 2 would increase the capacity at two of the other Electrical Needs Area Substations.

Upgrades at Potrero Substation would include:

- The replacement of two 22.4 MVA transformers with two 28 MVA transformers. The upgrade of two 3 MVAR 16 kV station capacitor banks to two 4.8 MVAR 16 kV station capacitor banks.
- The installation of one new 16 kV circuit that would extend approximately 1 mile.

Upgrades at Royal Substation would include:

- The replacement of one 22.4 MVA transformer with a 28 MVA transformer.
- The replacement and relocation of two 16 kV capacitor banks (4.8 and 6.0 MVAR) with three new 4.8 MVAR 16 kV capacitor banks.
- The extension of the 16 kV operating and transfer buses and rack.
- The installation of two new 16 kV circuits that would extend approximately 6.5 miles in length.

System Alternative 2 would provide the following benefits:

- System Alternative 2 would add 16.8 MVA of additional capacity to the Electrical Needs Area Substations for a combined total of 112 MVA of capacity at Potrero Substation and Royal Substation. This capacity increase would meet the forecasted load through 2014. Following these upgrades, there would be no remaining options for increasing capacity at any of the Electrical Needs Area Substations.
- Improve operational flexibility and reliability by providing the ability to transfer load between 16 kV distribution circuits and other Electrical Needs Area Substations."

In the Draft EIR, System Alternative A was rejected based on the fact that it was projected to be capable of meeting load requirements only through 2014, which was clearly in conflict with SCE's first stated objective in the PEA and the Draft EIR: "Meet long term electrical demand requirements in the ENA beginning in 2011 and extending beyond 2014 in order to meet 10-year planning criterion." As is discussed above, with the elimination of System Alternative B from the EIR, in order to evaluate another alternative that could potentially reduce significant unavoidable (Class I) impacts of the Proposed Project, the CPUC reconsidered System Alternative A by requesting additional information from SCE which helped to further evaluate the feasibility of System Alternative A. In order to accurately reconsider System Alternative A, it was necessary to update the project objectives to address the passage of time since the 2008 PEA and revised load forecasts. This required the following staff-initiated changes to the Draft EIR:

Page Change

ES-3 Under the heading **SCE's Proposed Project Objectives**, the following reference has been revised:

The objectives of the Proposed Project are defined by SCE in its PEA and subsequent information (SCE, 2008; SCE 2012a, b and c).

- **ES-3** Under the heading SCE's Proposed Project Objectives, the first bullet point has been revised as follows:
 - Meet long term electrical demand requirements in the ENA beginning in 2011 and extending beyond 2014 in order to meet 10 year planning criterion; electrical needs area (ENA) as defined in the proponents application, PEA, and supplemental information;
- **ES-5** Under the heading **Basic Project Objectives** as defined by the CEQA Team, the first bullet point has been revised as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, <u>PEA</u>, and <u>supplemental information</u> and <u>PEA</u> (SCE, 2008 and 2012a, b and c); and
- **1-2** Under the heading **1.2 Project Objective**, the last sentence of the first paragraph has been amended as follows:

SCE identified the objectives for the Proposed Project in its PEA (SCE, 2008 and 2012a, b and c) as follows:

- **1-2** Under the heading **1.2 Project Objective**, the first bullet point has been corrected as follows:
 - Meet long term electrical demand requirements in the ENA beginning in fall of 2012 or winter of 2013 and extending beyond 2014 in order to meet the 10-year planning criterion electrical needs area (ENA) as defined in the proponents application, PEA, and supplemental information;
- **1-2** Under the heading **1.2 Project Objective**, the second to last bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, and PEA, and revised demand forecasts (SCE, 2008 and 2012a and b); and
- **3-3** Under the heading **3.2.1** Consistency with Project Objectives, the following reference has been added to the first sentence of the second paragraph:

The objectives of the Proposed Project are defined by SCE in its PEA and supplemental information (SCE, 2008 and 2012a, b and c).

- **3-3** Under the heading **SCE's Proposed Project Objectives**, the first bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the <u>electrical needs area</u> ENA) beginning in 2011 and extending beyond 2014 in order to meet 10 year planning criterion; as defined in the proponent's application, PEA, and supplemental information including revised ENA load projections;
- **3-3** Under the heading **Basic Project Objectives as defined by the CEQA Team**, the first bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, and PEA, and supplemental information (SCE, 2008 and 2012a, b and c); and

The case for re-evaluating System Alternative A was based on the fact that, since the filing of the original PEA (Dec 22, 2008) and the present time (2013), SCE area load and projected load growth has declined. The 2008 PEA projected a 458 MVA load in 2018 for the three substations that comprise the ENA. This projection assumed that various loads external to the ENA would be moved (rolled⁴) into the ENA and served from one of the area substations once the Proposed Project was placed into service. It also assumed that other loads would be rolled out of the ENA with a net result of increased load rolled into the ENA. The 2018 load forecast (from the PEA) included the result of the planned load rolling. Given the economic downturn over the past few years, the most recent load forecast provided by SCE in testimony filed in January 2012 indicates a 2018 load of 398 MVA and a 2021 load of 445 MVA. These values also reflect the result of loads being rolled into the ENA. If one were to measure just the load presently within the ENA, SCE data indicates a total 2021 forecast of 420.8 MVA. The 25 MVA differential is the result of load being rolled into the ENA over the next 9 or 10 years, and not new load growth within the present ENA boundary.

SCE standard transformer design provides for a 145.6 MVA rating at each of the three existing substations. SCE substation data indicate a substation capacity of 144.0 MVA at Thousand Oaks Substation and 142.6 MVA at Royal Substation. (Royal is projected to increase to this level as a result of planned upgrades in 2015. See Appendix H for more information.) Potrero Substation transformer capacity is presently rated at 128.9 MVA. A planned upgrade is in progress to replace the existing transformers at Potrero Substation which would result in a substation transformer capability of 145.6 MVA, however the transformer circuit breakers and transformer bank leads are not being replaced and this will result in the Potrero Substation rating remaining at approximately 128.9 MVA. Consequently, the total ENA transformer capacity without upgrading Potrero Substation is 415.5 MVA. Upgrades at Potrero Substation (including the transformer breakers and leads) would add an additional 16.7 MVA resulting in an ENA capacity of

⁴ See discussion of load rolling in Master Response 1, *Alternatives*, item I.

432.2 MVA. With a 2021 load forecast of 420.8 MVA (exclusive of load rolling), the upgrades at Potrero Substation would be sufficient to meet the load forecast. However, the capacity is not sufficient to meet a forecast that includes load rolling (445 MVA, see above). System Alternative A would, by continuing to serve the ENA from the existing three substations (assuming Potrero Substation is upgraded fully) result in a small 11.4 MVA cushion during the summer of 2021. This small cushion could be enhanced during emergencies such as loss of one of the transformers by relying on the emergency transformer ratings; however the resultant high load to transformer rating (97.4 percent) could result in operational problems by limiting options for moving loads between circuits or substations, as sometimes becomes necessary to perform maintenance or during operational problems.

From an environmental perspective, System Alternative A appeared not to have any significant environmental impacts as it appeared to involve only simple upgrades to existing substations in the ENA although it was unclear as to how long System Alternative A would meet ENA load demands. While it may meet some of the basic Proposed Project objectives, System Alternative A also would be unable to provide as much operational flexibility as the Proposed Project. In SCE Data Response 10 (see Appendix H), SCE conducted a limited investigation of the potential effects on the ENA and surrounding substations and distribution equipment external to the ENA of implementing System Alternative A. As is discussed in greater detail in SCE Data Response 10 (Appendix H), far from being without environmental impacts, System Alternative A would necessitate additional distribution lines, extensive civil work at several substations external to the ENA, reconductoring some of the existing subtransmission lines and the likely addition of a new subtransmission line within the ENA and outside the ENA. The SCE study also showed that even with these additional changes resulting in unknown and unanalyzed potential environmental impacts, the Royal substation (within the ENA) is forecasted to exceed its planned loading limits by 2021 which would still necessitate a new substation located within the ENA (see Appendix H). Consequently, the CPUC concludes that including System Alternative A in the mix of alternatives analyzed is not warranted because this alternative would ultimately not meet future electrical demand and could potentially have environmental impacts similar to the Proposed Project.

C. Full Consideration of Alternative Alignment 4

Several commenters questioned why Alternative Subtransmission Alignment 4 was rejected from complete evaluation and consideration in the Draft EIR. CEQA requires that to be fully considered in an EIR, an alternative must have the potential to "avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines Section 15126.6(f)). At the screening stage, it is neither possible, nor legally required, to evaluate all of the impacts of an alternative in comparison to the Proposed Project with absolute certainty, nor is it possible to quantify impacts. However, it is possible to identify elements of an alternative that are likely to be the sources of impact and to relate them, to the extent possible, to general conditions in the subject area.

In this regard, Alternative Subtransmission Alignment 4 was assessed to determine whether it would avoid or substantially lessen any of the significant effects of the Proposed Project. As described in Chapter 3 of the Draft EIR, Alternative Subtransmission Alignment 4 would be technically feasible and capable of meeting basic project objectives; however, it would not reduce

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environmental impacts to a greater degree than Alternative Subtransmission Alignment 3, which was carried forward for complete analysis.

In order to underground the entire subtransmission alignment, construction emission levels (air quality impacts) and noise impacts would increase compared to the Proposed Project due to the increased trenching and duct bank construction required. This alternative would result in significant, unavoidable noise and air quality impacts. While the impact classification is the same as the Proposed Project (significant unavoidable, Class I), the actual emissions and noise impacts would be greater.

Undergrounding the subtransmission lines under this alternative would reduce the visibility of the Proposed Project along Sunset Valley Road and the segment extending west from the intersection of Read Road and Sunset Valley Road. However, while visually beneficial, the impact to aesthetic resources in these locations would be reduced to a less than significant level with implementation of Mitigation Measures 4.1-2a and b. The significant, unavoidable aesthetic resource impacts created by the subtransmission lines would occur at Olsen Road, near the proposed Presidential Substation. Alternative Subtransmission Alignment 3 and Alternative Subtransmission Alignment 4 both reduce impacts to aesthetic resources. However, because Alternative Subtransmission Alignment 4 would result in increased impacts to air quality and noise resources, Alternative Subtransmission Alignment 3 would therefore be environmentally superior to Alternative Subtransmission Alignment 4, and was consequently carried forward for analysis.

In addition, preliminary analysis of environmental impacts identified cultural resources within the subtransmission alignment segment between the origination point with Moorpark-Thousand Oaks No. 2 and the intersection of Read Road and Sunset Valley Road. Alternative Subtransmission Alignment 3 is above ground in this section and avoids impacts to these cultural resources, while Alternative Subtransmission Alignment 4 would create potentially significant impacts to cultural resources in this location.

Alternative Subtransmission Alignment 4 was eliminated from consideration because impacts to air quality, noise, and cultural resources would increase compared to the Proposed Project. In addition, the impacts on aesthetic resources would not be reduced more than under Alternative Subtransmission Alignment 3, which also reduced noise and air quality impacts, and was carried forward for analysis.

D. Environmentally Superior Alternative

As is discussed in Item B, above, the elimination of System Alternative B from the Draft EIR, which had been identified as the Environmentally Superior Alternative, requires the identification of a new Environmentally Superior Alternative. As is discussed in Chapter 5 of the Draft EIR, because no single alternative would provide an Environmentally Superior Alternative to both the proposed substation site and subtransmission alignment environmental impacts, it is necessary to consider a combination of alternatives from the Draft EIR. The combination of Alternative
Substation Site B with Alternative Subtransmission Alignment 3 was identified as second to System Alternative B in the Draft EIR and thus becomes the Environmentally Superior Alternative in the Final EIR. This combination would reduce the permanent significant unavoidable impacts on aesthetics of the Proposed Project but would still result in significant unavoidable temporary impacts related to noise and air quality. The new Environmentally Superior Alternative is shown on Figure 3-1. Because of this change to the Environmentally Superior Alternative, the following text changes have been made to Chapter 5, *Comparison of Alternatives*, in the Draft EIR:

On page 5-2, under the heading, Step 1: Identification of Alternatives, the following clarifications were made:

Step 1: Identification of Alternatives. An alternatives screening process (described in Chapter 3, Alternatives and Cumulative Projects) was used to identify approximately 16 alternatives to the Proposed Project. That screening process identified eight seven alternatives (each combination of components is considered a separate alternative) for detailed EIR analysis.

On page 5-2, under Section, 5.2 *Evaluation of Project Alternatives*, the first sentence, has been amended as follows:

This section compares the potential environmental impacts for the Proposed Project and eight seven alternatives.

On page 5-3, the first sentence of the first full paragraph, has been amended as follows:

There would be significant unavoidable (Class I) air quality impacts under the Proposed Project and each alternative, except System Alternative B (Table 5-1).

On page 5-3, under Section, 5.3 *Environmentally Superior Alternative*, the second paragraph, has been revised as follows:

The selection of an Environmentally Superior Alternative is based on differences in intensity and duration of significant impacts (Table 5-2). Based on these differences the identified environmentally superior alternative is System Alternative B. This alternative would not result in any significant unavoidable impacts. System Alternative B, which does not involve the construction of a new substation, would meet most of the basic project objectives but would result in reduced operational flexibility and reliability compared to the Proposed Project, and other alternatives which involve construction of a new substation. All other alternatives would result in at least one significant unavoidable impact.

Seven With the exception of the No Project Alternative, all of the alternatives combinations are variations of alignments and/or new substation location...



Presidential Substation Project . 207584.02 Figure 3-1 Environmentally Preferred Alternative

SOURCE: SCE, 2010

		Ranking (1 = Most Environmentally Preferred Alternative and 4 = Least Environmentally Preferred Alternative)	
Alternative	Significant (Class I) Impacts	Substation Site	Sub- transmission Alignment
Proposed Project – proposed Presidential Substation	Aesthetics – significant unavoidable: The Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views. Air Quality – significant unavoidable: The Proposed Project construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Significant unavoidable impacts would result from the combined emissions associated with all components of the Proposed Project.	3 2	
Proposed Project – proposed subtransmission alignment	Aesthetics – significant unavoidable: The Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views. <i>Air Quality – significant unavoidable</i> : The Proposed Project construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Significant unavoidable impacts would result from the combined emissions associated with all components of the Proposed Project. <i>Noise – significant unavoidable</i> : The Proposed Project construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria. Significant unavoidable impacts would result from the proposed subtransmission line, 16 kV distribution line and telecommunications cable and access road construction.		<u>ә 2</u>
Significant Impact	s (Class I) Eliminated or Created by Alternatives		
Alternative Subtransmission Alignment 1	Aesthetics – significant unavoidable: Aesthetic impacts would be created on views from three equestrian centers and the Ronald Reagan Presidential Foundation and Ronald Reagan Presidential Library. <i>Air Quality – significant unavoidable</i> : Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. <i>Noise – significant unavoidable</i> : Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.		4- <u>3</u>
Alternative Subtransmission Alignment 2	Aesthetics – significant unavoidable: Aesthetic impacts due to the presence of pole structures that would substantially degrade the existing visual character of the sites and their surroundings, and Class I impacts to approximately 2.7 miles of Olsen Road (designated Scenic Highway in the City of Thousand Oaks), and approximately 2.2 miles of Madera Road (designated Scenic Roadway in the City of Simi Valley). <i>Air Quality – significant unavoidable:</i> Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable.		4- <u>3</u>

TABLE 5-1 SUMMARY OF SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES BY COMPONENT

On pages 5-4 and 5-5, Table 5-1 has been revised as follows:

TABLE 5-1 (Continued) SUMMARY OF SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES BY COMPONENT

		Ranking (1 = Most Environmentally Preferred Alternative and 4 = Least Environmentally Preferred Alternative)	
Alternative	Significant (Class I) Impacts	Substation Site	Sub- transmission Alignment
Alternative Subtransmission Alignment 2 (cont.)	Noise – less than significant: Construction activities would eliminate significant unavoidable impacts related to exceeding Ventura County construction noise threshold criteria because unincorporated Ventura County residents would not be impacted under this alternative.		
Alternative Subtransmission Alignment 3	Aesthetics – less than significant. The subtransmission crossing of Olsen Road would be installed underground reducing the visual impact to less than significant. Air Quality – significant unavoidable: Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Noise – significant unavoidable: Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.		2-1
Alternative Substation Site B	Aesthetics – less than significant: Elimination of eliminate Class I impacts related to aesthetic resources. Air Quality – significant unavoidable: Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Noise – less than significant: Construction activities would not generate noise levels in unincorporated Ventura County in excess of Ventura County construction noise threshold criteria. Construction at this site would result in noise impacts less than significant.	2 <u>1</u>	
System Alternative B	Aesthetics – loss than significant. Class I aesthetic impacts would be climinated. Air Quality – loss than significant. Construction impacts in Ventura County associated with potential violation of ozone air quality standards and cumulatively considerable levels of NOx. Noise – loss than significant short-term construction impacts: Class I noise impacts in Ventura County would be eliminated. Unlike the Proposed Project and Alternative Substation Site B, this alternative would result in long term operational impacts at the Thousand Oaks Substation. However, these impacts would be mitigated to less than significant.		1

On page 5-5, under Section, 5.3 *Environmentally Superior Alternative*, the last paragraph has been changed to read:

As described above, System Alternative B is the only alternative which would not result in significant unavoidable impacts on any resource and is therefore ranked as the environmentally superior alternative. No single alternative would provide an environmentally superior alternative to both site and subtransmission environmental impacts; rather, a A combination of Alternative Substation Site B with Alternative Subtransmission Alignment 3 would follow as the next be the environmentally superior preferred alternative. This

combination would <u>still</u> result in significant unavoidable temporary impacts related to noise and air quality, but neither the substation nor the subtransmission alignment would result in permanent significant unavoidable impacts on aesthetics.

On pages 5-7 and 5-8, the System Alternative B column has been removed from Table 5-2:

Resource Area	System Alternative B
Aesthetics	Impacts would be less than the Proposed Project. Overall impacts would be less than significant. Preferred Least Impacts
Agriculture and Forestry Resources	Impacts would be less than the Proposed Project. No Preference
Air Quality	Impacts would be less than the Proposed Project. Overall, impacts would be mitigated to less than significant. Most Preferred Least Impact
Biological Resources	Impacts would be less than the Proposed Project. No Preference Least Impacts
Cultural Resources	Impacts would be less than the Proposed Project. No Preference Least Impacts
Geology, Soils, Seismicity and Mineral Resources	Impacts would be similar to the Proposed Project. No Preference
Greenhouse Gas Emissions	Impacts would be less than the Proposed Project. Most Preferred Least Impacts
Hazards and Hazardous Materials	Impacts would be less than the Proposed Project. No Preference Least Impacts
Hydrology/Water Quality	Impacts would be similar to Proposed Project but to a lesser degree. Most Preferred
Land Use/Planning	Impacts would be similar to the Proposed Project. No Preference
Noise	Construction impacts would less than significant. Operational impacts would be greater than the Proposed Project but mitigable to less than significant. Preferred Least Impacts
Population/Housing	Impacts would be similar to the Proposed Project. No Preference
Public Services	Impacts would be similar to Proposed Project but to a lesser degree. Preferred
Recreation	Impacts would be similar to Proposed Project but to a lesser degree. No Preference
Transportation/Traffic	Impacts would be less than the proposed project. No Preference Least Impacts
Utilities/Service Systems	Impacts would be similar to Proposed Project but to a lesser degree. No Preference Least Impacts

TABLE 5-2 PROPOSED PROJECT VS. ALTERNATIVES SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

On page 5-10, the System Alternative B row has been removed from Table 5-3:

TABLE 5-3 ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE

System Alternative B	Alternative would eliminate the significant unavoidable impacts associated with the substation site and Olsen Road crossing. Overall, impacts would be reduced to less than significant.	Alternative would not require construction of a new substation or subtransmission lines, resulting in less than significant impacts on air quality.	Short term construction impacts would be less than significant. Long term noise impacts are expected to increase due to larger transformers in the existing substations but would be mitigated to less than significant.
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Starting on page 5-10, Section 5.4 has been revised to reflect revisions to the alternative analysis incorporating changes to the revised Environmentally Superior Alternative:

5.4 No Project Alternative vs. the Environmentally Superior Alternative

5.4.1 Summary of the No Project Alternative and Its Impacts

The No Project Alternative is described in Section 3.4.<u>56</u>. Under the No Project alternative <u>Alternative</u>, the Proposed Project would not be built and would therefore have no environmental impacts related to project construction and maintenance...

5.4.2 Summary of the Environmentally Superior Alternative and Its Impacts

The Environmentally Superior Alternative is defined in Section 5.3 as <u>a combination of</u> <u>Alternative Substation Site B with Alternative Subtransmission Alignment 3</u> System <u>Alternative B</u>. Impacts of <u>the Environmentally Superior Alternative</u> System Alternative B are defined in each resource area's impact analysis in Sections 4.1, *Aesthetics*, through 4.16, *Utilities and Service Systems*, and are also summarized in Table 5-2, above. The Environmentally Superior Alternative would <u>meet most basic project objectives but</u> would still result in significant unavoidable (Class I) temporary impacts related to air <u>quality and noise; however, neither the substation nor the subtransmission alignment would</u> <u>result in permanent significant unavoidable impacts on aesthetics</u> have no significant <u>unavoidable impacts. However, although System Alternative B would meet most basic</u> project objectives, it would result in reduced operational flexibility compared to the Proposed Project, and the seven alternatives involving construction of a new substation.

5.4.3 Conclusion: Comparison of the Environmentally Superior Alternative with the No Project Alternative

The Environmentally Superior Alternative (<u>Alternative Substation Site B with Alternative</u> <u>Subtransmission Alignment 3</u>System Alternative B) would result in less-than-significant impacts on aesthetics <u>but would still result in significant unavoidable (Class I) temporary</u> <u>impacts related to air quality and noise</u>, noise and air quality resources and would have with minimal long-term impacts on residences. The most significant impact of the No Project Alternative is that SCE's ability to provide safe and reliable electric service to customers within the ENA would be jeopardized, creating the potential for increased incidence of brown-outs and black-outs in the future which could in turn result in indirect impacts to the provision of public services. Overall, the Environmentally Superior Alternative is preferred over the No Project Alternative, as the No Project Alternative would not meet the basic project objectives.

E. Demand Management Alternative

As discussed in Section 3.5.8 of the Draft EIR, an alternative evaluating Demand Management Conservation programs was considered and rejected because such programs are voluntary and cannot provide either the capacity or reliability needs of SCE in the ENA, as stated in the objectives for the Proposed Project. Demand Management Conservation programs are designed to reduce customer energy consumption. CPUC regulatory requirements dictate that supply-side and demand-side resource options should be considered on an equal basis in a utility's plan to acquire lowest cost resources. These programs are designed to either reduce the overall use of energy or to shift the consumption of energy to off-peak times.

SCE currently offers a number of energy efficiency programs in California, under the umbrella of its Rebate and Savings program. The specific programs are divided into residential, business, builders and buyers, and energy management assistance programs. Reductions in demand through energy conservation programs are part of SCE's future operations and are incorporated into its long-term peak load forecasts. Existing Demand Management Conservation programs run by SCE include rebates on energy-efficient appliances, incentives for customer-owned solar generation, a metering system that allows SCE customers with smart thermostats and appliances to automatically respond during critical peak pricing and reliability events, and more (SCE, 2011). However, these programs require voluntary participation. As separate and stand alone programs, SCE could not guarantee that such voluntary programs would provide either the capacity or reliability needs of SCE in the ENA, as stated in the objectives for the Proposed Project. Because this alternative would not meet any of the basic project objectives and was not considered feasible to replace the Proposed Project in a reasonable period of time, it was eliminated from further consideration.

F. Consideration of Other Alternatives

Many commenters on the Draft EIR have requested the consideration of various other alternatives, including alternatives either considered and rejected by the Draft EIR or new alternatives not previously considered. Section 3.2 of the Draft EIR describes the screening methodology used by the Draft EIR and references CEQA Section 15126.6(a) which states:

"An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation...The lead agency is responsible for selecting a range of project alternatives for examination and must publically disclose its reasoning for selecting those alternatives."

CEQA Section 15126.6(a) further states:

"An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."

Draft EIR, Chapter 3, *Alternatives and Cumulative Projects*, provides a description of sixteen potential alternatives for the Proposed Project, including an explanation of the approach and methods used to screen the feasibility of alternatives according to guidelines established under CEQA. "Feasible" is defined for purposes of CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (Cal. Code Regs. §15364). A determination of infeasibility may be based on specific technological, social, economic, environmental, or legal considerations.⁵

The range of alternatives screened for feasibility included alternatives presented by SCE in its PEA and alternatives developed by the CEQA team, which took into consideration suggestions presented during the scoping period (February 17, 2009 – March 19, 2009) and during the supplemental scoping period (August 26, 2010 – September 25, 2010). Given that the Draft EIR considered 16 alternatives in the screening process and carried forward nine alternatives for the full analysis and examination, the CPUC believes that the alternatives analysis clearly meets the intentions of CEQA and comprises a reasonable range of alternatives.

Many of the commenter-requested alternatives featured alternative energy such as solar and distributed generation. As discussed in Sections 3.5.8 and 3.5.9 of the Draft EIR, alternatives using renewable energy and distributed generation were considered and rejected because increasing the production of energy generated from renewable sources would not alleviate substation capacity in the ENA, as the electricity would still use the existing distribution system. Solar programs require voluntary participation, and as was stated in Section 3.5.8 of the Draft EIR, "SCE cannot guarantee that such voluntary programs would provide either the capacity or reliability needs of SCE in the ENA, as stated in the objectives for the Proposed Project." A distributed generation alternative would involve deployment of distributed generation in the form of many small projects within the

⁵ In addition to an alternative being potentially feasible, broader considerations come into play when a decisionmaking body is considering actual feasibility. For example, in *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000, the court held that the City was legally justified in rejecting environmentally superior alternatives identified in a Draft EIR as infeasible based on its determination that they were undesirable from a policy perspective. Other considerations, such as practicality, policy, or the provision of employment opportunities for highly trained workers, also may provide a basis to find that an alternative is infeasible (Pub. Res. Code §21081(a)(3); 14 Cal. Code Regs. §15091(a)(3)). Further, the courts have explained that the CEQA concept of feasibility encompasses "'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998).

ENA at a pace more aggressive than SCE anticipates, or is projected in the Clean Energy Jobs Plan, which identified 2020 as the target date for developing 12,000 MW of distributed energy. However, even if distributed generation energy supply sources in the ENA were built, substation capacity would continue to be a limiting factor requiring additional infrastructure. Because the potential for, and timing of, distributed generation within the ENA is uncertain and would require additional substation capacity, this alternative was not carried forward for analysis. See Sections 3.5.8 and 3.5.9 of the Draft EIR for further information on these other alternatives.

G. No Project Alternative

A number of commenters have stated that the description and analysis of the No Project Alternative is incorrectly or inadequately analyzed in the Draft EIR. As described in Section 3.4.6 of the Draft EIR, the No Project Alternative is described simply and correctly in that it represents the scenario under which the Proposed Project would not be implemented. This infers that electrical infrastructure within the ENA would remain essentially as it existed on the date that the Notice of Preparation (NOP) for the Proposed Project was published (Friday, February 17, 2009). The NOP date is the normal date for establishing baseline conditions for a CEQA project and, as per CEOA Section 15126.6(e)(2), the conditions present in formation of No Project Alternative is linked to the NOP date. Analysis of the No Project Alternative with respect to each environmental criteria considered was provided in the alternatives analyses in Draft EIR Sections 4.1 (Aesthetics) through 4.16 (Utilities and Service Systems). A summary and discussion of conclusions about the No Project Alternative was provided in Draft EIR Section 5.4.1 and the No Project Alternative was considered with respect to the Environmentally Superior Alternative in Draft EIR Section 5.4.3. Thus, the Draft EIR provides adequate disclosure and analysis of the No Project Alternative. In fact, the Draft EIR does not dismiss the No Project Alternative as suggested by one commenter, but instead discloses the significant impacts of the No Project Alternative and finds the Environmentally Superior Alternative preferred over the No Project Alternative (see Draft EIR Section 5.4.3, revised under Item E, above).

Several commenters expressed concerns about the demand projections used for the Draft EIR and the analysis of the No Project Alternative. The commenters correctly note that SCE's demand projects considered by the Draft EIR were based on projections for 2008 from SCE's Proponent's Environmental Assessment (PEA), and the commenters also correctly note that in subsequent data provided by SCE, electrical demand has declined somewhat in the ensuing years (SCE, 2012b). As is discussed above in this Master Response under Item B, SCE's latest demand projections (for 2011) still show that while the demand declined between 2008 and 2011, demand is projected to increase, resulting in the need for the Proposed Project at or near the end of 2021. As such, the conclusions about the potential impacts of the No Project Alternative provided in Draft EIR Sections 5.4.1 and 5.4.3 are still applicable. As described in Draft EIR page 5-10, conditions under the No Project Alternative:

"...would jeopardize SCE's ability to provide safe and reliable electric service to customers within the ENA, creating the potential for increased incidence of brown-outs and black-outs in the future."

One commenter stated that a review of demand and the No Project Alternative was promised by a previous CPUC administrative law judge. The authors are unable to verify this statement in the EIR scoping records for the Proposed Project. The commenter is correct that the analysis provided for the No Project Alternative in the Draft EIR did not specifically discuss electrical demand. However, meeting long term demand and increasing system operational reliability and flexibility are inherent project objectives, and in this respect the No Project Alternative was evaluated against these project objectives. In Section 5.4.3 the Draft EIR concludes that the No Project Alternative fails to meet those basic project objectives.

H. Electrical Demand

A number of commenters have expressed concerns related to the electrical demands for the ENA and about the projected or forecast demand needs for the Proposed Project. As is discussed in Item A, above under General Order 131-D, for an application for a Permit to Construct to the CPUC, an EIR need only focus on environmental review issues, and does not address project need (see Master Response 2, *Non-CEQA Issues*, Item A, below, for a full discussion).

Several comments have questioned the electric demand forecasting used for the ENA as described in the Draft EIR, which was based on 2008 data from SCE's Permit to Construct Application. They also note that more recent data from SCE for 2010 and 2011 show that within the ENA, electric demand has declined somewhat below forecasts bringing into question the forecasted demand described in the Draft EIR and considered as a the basis for justification of the Proposed Project and considered alternatives (see Appendix H). Given that CEQA §15144 recognizes that EIRs involve "some degree of forecasting" and that "while foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose what it reasonably can," the CPUC has relied on SCE forecast data for its environmental review of the Proposed Project. As is discussed in detail in Item B, above, these noted changes between the original demand forecast in 2008 by SCE and revised data from 2010 and 2011 have been considered in revisions to the analyses of the Proposed Project and alternatives, and slight revisions have been made to the project objectives. What is also clear from the most recent SCE demand forecasts (see Appendix H) is that in adjusting the project objectives to account for the passage of time since 2008 and re-evaluating both System Alternatives A and B (see the discussion of this presented in Item B, above), the Proposed Project is still necessary within SCE's 10-year planning cycle ending in 2021. Thus, while the commenters correctly point out that since 2008 electric demand within the ENA has declined, pushing the need for the Proposed Project out further than envisioned in the Draft EIR, more recent SCE data still show the need for the Proposed Project within the updated 10-year SCE planning period ending in 2021.

I. Load Rolling

Comments on the Draft EIR, recent testimony, and data provided by SCE have identified the need to define and discuss the concept of "load rolling" within the electrical grid. Load rolling is transferring load from one distribution circuit to an adjacent circuit. The topography of distribution circuits is generally such that each circuit interconnects to other circuits at a number of locations via normally open switches. By closing a switch at one point and opening one at

another point the load carried between the two switch points can be transferred or "rolled" from one circuit to the other. These types of switching operations are fairly routine and are a current practice within the ENA for the Proposed Project. The reason this type of switching has come into focus for the Proposed Project is the potential impact future load rolling has on the load forecast for the substations within the ENA.

Given the economic downturn over the past four years, the most recent load forecast provided by SCE in testimony filed in January 2012 indicates a 2018 load of 398 MVA and a 2021 load of 445 MVA. These values also reflect the result of loads being rolled into the ENA. If one were to measure just the load presently within the ENA, SCE data indicates a total 2021 forecast of 420.8 MVA, with the 25 MVA differential being the result of load being rolled into the ENA over the next 9 or 10 years and not new load growth within the present ENA boundary. Of significance to the Proposed Project is the fact that the 420 MVA load appeared to the authors to able to be meet SCE projected load forecasts with present equipment augmented by minor substation enhancements within the Potrero Substation. As is discussed in Master Response 1, Alternatives above, it was for this reason that System Alternative A (eliminated from consideration in the Draft EIR) was reexamined by the CPUC. Based on data provided by SCE in Data Response 10 (see Appendix H), allowing for load rolling and only upgrading the three ENA substations, substantial changes would be required to several substations including upgrades to breakers, transfer buses, and racks, and infrastructure external to the ENA including new distribution and subtransmission lines. These changes would also have the potential to have significant environmental effects similar to the Proposed Project including potential visual impacts from new overhead lines, impacts to air quality and noise from construction activities. The CPUC concluded that System Alternative A remains infeasible and that load rolling was and is a part of the Proposed Project.

3.1.2 Master Response 2: Non-CEQA Issues

Commenter	Comments Addressed by Master Response 2
City of Thousand Oaks	A14-3, A14-14
Center for Biological Diversity	A15-3, A15-5 to A15-7, A15-27, A15-42
STTOP	A16-3 to A16-4, PH2
Betty Evans	11-2
Matt Anaya	12-3
Dennis Broersma	13-1, 112-2
Deborah Cassar	14-1
Jennifer Crandall	I5-1 to I5-4, I5-7, I5-11, I23-1, PH25, PH29 to PH31
Chuck Cronin	16-2, 16-5
Kim Halizak	19-4
Louise Meisterling	110-2
Jennie Crowley	114-1-2
Charlotte Watters	117-2, 117-4 to 117-5

Summary of Commenters and Comments

Commenter	Comments Addressed by Master Response 2
Jon and Sharon Fleagane	118-4, 118-6
Martin Josephson	119-1
Silvia Scally	120-1
Mercedes Todesco and Family	121-6, 133-2
Valdez Kutter	122-9, 122-12
Gary Morse	124-1
Ginger Brandenburg	125-1
Chris Hansing	127-1, 127-5, 127-6
Michael Flocks	132-1
Lily Wu	134-2
Janet Richards	136-1
Craig Underwood	137-2, 137-4
Form Letter	139-4
Kristi Brumle	PH20
Andy Gosser	PH33, PH38

Summary of Issues Addressed in Master Response 2

A. General Order No. 131-D

Per General Order No. 131-D, the CPUC has exclusive jurisdiction over Proposed Project siting and design. Because the Proposed Project is approval of a Permit to Construct, it is regulated by this General Order, and is exempt from local land use and zoning regulations and discretionary permitting. Although General Order No. 131-D was discussed in numerous sections of the Draft EIR including Section 1.3.2, *Other Agencies*, Section 2.5, *Proposed Project Components*, and in particular, Subsection 4.10.4 of Section 4.10, *Land Use and Planning*, comments received on the Draft EIR have indicated the need to further explain General Order No. 131-D and to augment text in the Draft EIR accordingly.

B. Choice of the Electrical Needs Area

In response to numerous comments received on the Draft EIR about SCE's selection of the ENA for the Proposed Project, the CPUC requested that SCE provide an explanation of their choice for the ENA.

C. Economic Impacts

Many commenter expressed concerns about the Proposed Project's effects on property values, SCE rate increases, and other economic impacts. This response explains how a project's social or economic effects relate to CEQA.

D. Electric and Magnetic Fields (EMF)

Numerous commenters expressed concerns about effects associated with EMFs. This response discusses the CPUC policy for evaluation of EMF.

Response

A. General Order 131-D

CPUC Jurisdiction

As discussed in numerous sections of the Draft EIR including Section 1.3.2, *Other Agencies*, 2.5, *Proposed Project Components*, and in particular, Section 4.10.4 of Section 4.10, *Land Use and Planning*, per CPUC General Order No. 131-D the CPUC has exclusive jurisdiction over Proposed Project siting and design. Because the Proposed Project is approval of a Permit to Construct, it is regulated by this General Order, and is exempt from local land use and zoning regulations and discretionary permitting.

For clarification purposes, the following text has been added to the Draft EIR as a footnote on page ES-8:

"The Proposed Project is subject to <u>CPUC General Order No. 131-D</u>, <u>Section XIV.B</u>, which preempts local jurisdictions from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. See Chapter 4, *Introduction to Environmental Analysis*. for a discussion of General Order 131-D."

Similarly, the following text has been added to Draft EIR Section 4.0, *Introduction to Environmental Analysis*, page 4-2, under the subheading Environmental Assessment Methodology:

Scope of the Environmental Assessment

General Order No. 131-D Section XIV. Complaints and Preemption of Local Authority, Subsection B states that local jurisdictions are preempted from regulating electrical power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to CPUC jurisdiction. Public utilities, such as SCE, are required to consult with local agencies regarding land use matters; however, local policies do not apply to such projects. This preemption would include the Proposed Project. As a result, any analysis on local policies and issues provided in this EIR is for informational purposes only. The Proposed Project is not required to comply with local policies and therefore a conflict with a local policy is not considered a significant impact.

Need for Detailed Analysis of Purpose, Need, or Cost

General Order No. 131-D, Section IX.B.1.f. also states, "an application for a permit to construct need not include either a detailed analysis of purpose or necessity, a detailed estimate of the cost and analysis...beyond that required for CEQA compliance."

As noted in the April 2009 and November 2010 Scoping Reports issued for the Proposed Project: "The EIR also will not consider comments that pertain to SCE's determination of project need. The CEQA process does not require the EIR to assess project need as established by the project applicant. In addition, General Order 131-D establishes the distinction in the review levels a

project receives based on the voltage level proposed. The Proposed Project does not meet the threshold of 200 kV to qualify for a project needs assessment. Additionally, the application submitted by SCE was for a Permit to Construct [PTC] which does not require an electrical needs assessment." This reasoning is supported by CPUC Decision 94-06-014, which adopted General Order No. 131-D:

"The process we adopt for lines between 50 and 200 kV differs from the review that results in the issuance of a Certificate of Public Convenience and Necessity (CPCN) for lines over 200 kV. The process will result in a 'permit to construct' and our review will focus solely on environmental concerns, unlike the CPCN process which considers the need for and the economic cost of a proposed facility."

"Because the Permit to Construct (PTC) review focuses solely on environmental issues, the Commission, on the advice of Commission staff, shall issue or deny a permit as soon as it may legally do so following completion of the requisite CEQA review."

"The Energy Division of the CPUC in conjunction with other parties developed a (PTC) procedure for power lines designed to operate between 50 and 200 kV. The (PTC) review is meant strictly for environmental review, not economic or 'needs' review."

B. Choice of the Electrical Needs Area (ENA)

In response to numerous comments received on the Draft EIR about SCE's selection of the ENA for the Proposed Project, the CPUC requested that SCE provide an explanation of their choice for the ENA. In their response, SCE explained that ENA for the Proposed Project was defined by the outer limits of the distribution circuits emanating from the Thousand Oaks, Royal, and Potrero substations. This is discussed in greater detail in Response to Question 4 of Data Request 8 (March 19, 2012, see Appendix H), where SCE provided the following full explanation:

"To understand how SCE defined the Electrical Needs Area (ENA), one must first understand what circumstances drive the need for a project. An action plan is typically identified when a constraint on the electrical distribution system is identified. In the case of this project, it was originally observed that the last transformer bank capacity increase project at Thousand Oaks Substation in 2008 built the substation out to its capacity limit. Future growth needs within the sphere of influence of Thousand Oaks Substation would need to be served from the surrounding substations. During this review, it was noticed that while Royal Substation and Potrero Substation are not yet completely built-out, they are both within one small capacity increase project of being completely built-out. Thus, an area was identified where three contiguous substations were either at or near their ultimate capacity. The location where customers are no longer being served from Thousand Oaks Substation, Royal Substation, and Potrero Substation was defined as the outer boundary of the ENA. That is, the ENA is defined by the outer limits of the distribution circuits emanating from Thousand Oaks Substation, Royal Substation, and Potrero Substation.

In regards as to why the neighboring Newbury Substation, Oak Park Substation, and Santa Susana Substation were not included in the ENA, Newbury Substation has the potential

capability of having an additional 11.2 megavolt-amperes (MVA)⁶ of nameplate capacity added before it will reach its ultimate build-out of 112 MVA of nameplate capacity. However, upgrading Newbury Substation would not provide any direct capacity relief to the ENA. Oak Park Substation and Santa Susana Substation are substations where future capacity upgrades are impractical due to the existing limited footprint of each substation. While Oak Park could provide some capacity relief to Thousand Oaks and Potrero Substations, it is too far away to provide effective capacity relief to Royal Substation. Santa Susana Substation has the potential capability of having an additional 8 MVA of nameplate capacity before it reaches its ultimate build-out of 112 MVA of nameplate capacity. Likewise, Santa Susana Substation could also provide some limited capacity relief to Royal Substation, but it is too far away from Thousand Oaks Substation and Potrero Substation. By placing the new capacity in a central location within the ENA, the new capacity can be effectively tapped into and significant load relief provided to all of these substations so that SCE can continue to provide safe and reliable electrical service to its customers.

As discussed in PEA Section 2.1.3, although the upgrade of Royal Substation and Potrero Substation would provide direct capacity relief to the ENA, following these upgrades, there would be no remaining options for increasing capacity at any of the ENA Substations. Therefore, as also discussed within PEA Section 2.13, these substations upgrades would only delay, but not eliminate, the need for a new substation in the ENA. Including the upgrades of Santa Susana Substation and Newbury Substation to their ultimate 112 MVA in addition to building Royal Substation and Potrero Substation to their ultimate 112 MVA nameplate capacity would provide sufficient capacity in the ENA to meet the 10 year Peak Demand Forecast, but would unfortunately result in a situation where five adjacent substations (Santa Susana Substation, Royal Substation, Thousand Oaks Substation, Potrero Substation, and Newbury Substation) would all be operating at their 112 MVA ultimate build-out capacity.

SCE is concerned with the potential reduced reliability and operational flexibility associated with building-out multiple adjacent substations with high utilization rates in a localized area during peak conditions. In addition, because SCE is obligated to serve all existing and new customers within its service territory, SCE is concerned that if a new large 5-10 MVA customer were to apply for service in this area that SCE may not be able to serve the customer in a timely manner because of the lack of available capacity.

The SCE grid is interconnected and benefits of a proposed project are not necessarily constrained by the ENA boundary. Trying to analyze a large regional ENA with multiple substations is significantly more difficult than analyzing a single substation ENA. Problems associated with a large regional ENA with multiple substations would potentially show such an ENA as a whole having sufficient capacity. However, this approach would lose sight of the more localized constraints, such as when the first substation reaches it Maximum Operating Limit, which could be years before the entire reserve capacity of a larger regional ENA reached its capacity. Therefore, SCE proposes an ENA to address the more localized need and system constraints which would otherwise be "lost in the shuffle" in a broader more generic ENA."

⁶ Megavolt ampere (MVA) is a measure of electrical capacity equal to the product of the voltage times the current. Electrical equipment capacities are sometimes stated in MVA.

Based on this reasoning, comments requesting expansion of the chosen ENA and inclusion of analysis of additional substations external to the ENA are not further addressed in this EIR.

C. Economic Impacts

According to the CEQA Guidelines (§15358 [b]), impacts to be analyzed in an EIR must be "related to physical changes" in the environment. CEQA Guidelines (§15131 [a]) do not directly require an analysis of a project's social or economic effects because such impacts are not, in and of themselves, considered significant effects on the environment. The guidelines state:

"Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes caused in turn by economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

The CEQA Guidelines also provide that physical effects on the environment related to changes in land use, population and growth rate induced by a project may be indirect or secondary impacts of the project and should be analyzed in an EIR if the physical effects would be significant (see Guidelines §15358[a][2]).

Consequently, under CEQA, economic impacts to land owners and businesses are generally only relevant if the magnitude and severity of the losses would result in adverse physical changes (such as irreparable damage to land conditions or elimination of agricultural productivity). Thus, concerns about SCE rate increases are beyond the scope of CEQA analysis and such concerns are addressed by the CPUC external to the EIR process, as part of the rate making process.

Numerous commenters expressed concern about potential adverse effects on property values from the Proposed Project. Property value is an economic concern and therefore not a CEQA issue. Projecting the magnitude of any decrease in property values, which are affected by multiple factors, requires extensive real estate market analysis and is beyond the scope of environmental review under CEQA.

D. EMF

Although the presence of electric and magnetic fields (EMF) are generally not recognized as a CEQA issue, the potential relevance and effects of EMFs are discussed in the Draft EIR, Section 4.8, *Hazards and Hazardous Materials*. As described in Section 4 of the Presidential Substation Project Scoping Report published in April 2009 (page 33), "The EIR will not consider electric and magnetic fields (EMF) in the context of the CEQA analysis of potential environmental impacts because [1] there is no agreement among scientists that EMF creates a potential health risk, and [2] there are no defined or adopted CEQA standards for defining health risk from EMF. Presently, there are no applicable federal, state or local regulations related to EMF levels from power lines or related facilities, such as substations. However, under CPUC

decision, D.06-01-042, utilities must incorporate low-cost or no-cost measures for managing EMF⁷ from power lines up to approximately four percent of total project cost."

Draft EIR Section 2.10 (page 2-55 et seq.) describes the CPUC's approach to analysis of EMF, which is to consider it outside the scope of the EIR in the absence of regulations or standards that would inform significance determinations. Appendix B to the Draft EIR, *SCE's EMF Field Management Plan* (page B-1 et seq.), quantitatively estimates EMFs that would be generated by the Project and describes the measures SCE would implement, in compliance with CPUC requirements, to reduce EMFs from this Project.

3.1.3 Master Response 3: Undergrounding

Commenter	Comments Addressed by Master Response 3
Ventura County Board of Supervisors	A8-2
Matt Anaya	12-4
Jennifer Crandall 1	15-14
Louise Meisterling	110-3, 110-4
Jennie Crowley	114 -3
Arnold Sodergren	116-1
Charlotte Watters	117-1, 117-6
Jon and Sharon Fleagane	118-2, 118-9
Martin Josephson	119-1
Mercedes Todesco 2	121-8, 121-9
Valdez Kutter	122-3, 122-5, 122-6
Chris Hansing	127-2
Michele Flocks	128-1
Marjorie Herring	129-3
Richard and Linnea Brecunier	131-4
Janet Richards	I36-1, PH45
Beth Kuttler	PH10
Mark Cassar	PH11
Kirsti Brumle	PH22

Summary of Commenters and Comments

Summary of Issues Addressed in Master Response 3

A. Undergrounding versus Overhead Power Lines

Commenters have expressed a desire for all new utility lines related to the Proposed Project to be installed underground. This response discusses issues associated with undergrounding of utility lines compared to the installation of overhead power lines.

⁷ Managing EMF here means ways to reduce the amount or area influenced by EMF.

Response

A. Undergrounding versus Overhead Power Lines

A number of comments express a desire for all new utility lines related to the Proposed Project to be installed underground. This response discusses issues associated with undergrounding of utility lines. Master Response 3.1.1, *Alternatives*, discusses Alternative Subtransmission Alignment 4, an alternative to the Proposed Project in which all new 66 kV subtransmission lines would be undergrounded.

As discussed in numerous sections of the Draft EIR including Section 1.3.2, *Other Agencies*, Section 2.5, *Proposed Project Components*, and in particular, Section 4.10.4 of Section 4.10, *Land Use and Planning*, the CPUC has exclusive jurisdiction under CPUC General Order No. 131-D over project siting and design. Because the Proposed Project is regulated by this General Order, it is exempt from local land use and zoning regulations and discretionary permitting. Therefore, the Project is not subject to local regulations regarding the undergrounding of the proposed subtransmission or telecommunication lines, or existing distribution lines. CPUC General Order No. 131-D is discussed in greater detail in Master Response 2, *Non-CEQA Issues*, above in Section 3.1.2.

As discussed in Master Response 3.1.1, *Alternatives*, the Draft EIR considered the scenario desired by these commenters in Section 3.5.1, *Alternative Subtransmission Alignment 4*, which discussed an alternative to the Proposed Project in which all new 66 kV subtransmission lines would be undergrounded. The Draft EIR concludes the following on page 3-27:

"Impacts on aesthetic resources would be reduced to a level of less than significant in the same manner as Alternative Subtransmission Alignment 3.

In addition, preliminary analysis of environmental impacts identified potential significant impacts on cultural resources for the segment between the origination point with Moorpark-Thousand Oaks No. 2 and the intersection of Read Road and Sunset Valley Road.

Alternative Subtransmission Alignment 4 was eliminated from consideration because impacts to air quality and noise resources would increase and an additional potentially significant cultural resources impact would occur. In addition, the impacts on aesthetic resources would not be reduced more than under Alternative Subtransmission Alignment 3 which also reduced noise and air quality impacts and was carried forward for analysis."

Note that in the Draft EIR Alternative Subtransmission Alignment 3, which considered partial undergrounding of power lines, was retained for full analysis in the Draft EIR and has now been determined to be in this Final EIR a part of the new Environmental Superior Alternative (see Section 3.1.1, Master Response 1, *Alternatives*). This alternative would reduce the significant visual impacts and while still having significant air quality and noise impacts, would result in lesser impacts than Alternative Subtransmission Alignment 4.

As discussed in the Draft EIR, although there may be aesthetic benefits to placing a subtransmission alignment underground, the installation underground of all or portions of the

subtransmission source lines would result in greater environmental impacts to other resource areas, compared to overhead construction. Underground construction of the subtransmission source lines would require extensive trenching to install the duct banks that would carry the subtransmission conductor and related infrastructure. The additional mechanized equipment, related fuel use and exhaust, surface and subsurface disturbance, and time required to complete the trenching work would consequently result in greater construction emission levels (air quality impacts), and greater impacts pertaining to erosion, biological resources, cultural resources, and noise, compared to an aboveground alternative (see Draft EIR, page 3-27).

Maintenance and repair of underground facilities could require more time and cause greater impacts than the maintenance and repair of overhead facilities, because accessing the subsurface line could cause construction-related effects associated with isolating the issue area, excavating a work area sufficiently-sized for access and safety, and then refilling/reburying the affected area. These activities would cause greater operation and maintenance impacts related to air quality, cultural resources, erosion, biological resources, and noise compared to the proposed construction of overhead lines, as well as greater impacts to traffic. Even if repair and maintenance of a subsurface line could be accomplished without surface disturbance, (i.e., by manipulating the line via underground access points, working in vaults or other access ways), this would require underground lighting and attention to hazard considerations (confined space entry, etc.) that would not be associated with aboveground work. Further, because underground lines are encased in concrete, it generally is more difficult to locate and repair problems, which can prolong the time before power is restored after an interruption.

It is for these reasons – increased environment impacts over an overhead alternative and/or a partial undergrounding alternative - that the alternative of undergrounding all subtransmission alignments associated with the Proposed Project (Alternative Subtransmission Alignment 4) was considered and eliminated in the Draft EIR. Also see Master Response 1, *Alternatives*.

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3.2 Agencies and Organizations Responses

This section includes responses to comments received from agencies and organizations. Individual comments have been delineated and are followed by responses to each comment.

STATE OF CALIFORNIA

Comment Letter A1 Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-4082 (916) 657-5390 - Fax



A1-2

A1-3

A1-4

September 26, 2011

Juralynne Mosley California Public Utilities Commission 505 Van Ness Avenue, 4th Floor San Francisco, CA 94102

RE: SCH# 2009021059 Southern California Edison Company, Presidential Substation EIR; Ventura County

Dear Ms. Mosley:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- Contact the appropriate regional archaeological Information Center for a record search. The record search will determine: A1-1
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE. .
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. . USGS 7.5 minute guadrangle name, township, range and section required.
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached.
- Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerel Katy Janchez Katy Sanchez

Program Analyst (916) 653-4040

cc: State Clearinghouse

Native American Contact List Ventura County September 26, 2011

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Owl Clan

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Chumash Fernandeno Tataviam Kitanemuk

Chumash

Tataviam

Chumash

Fermandeño

Barbareno/Ventureno Band of Mission Indians Julie Lynn Tumamait, Chairwoman 365 North Poli Ave Chumash Ojai , CA 93023 jtumamait@sbcglobal.net (805) 646-6214

Patrick Tumamait 992 El Camino Corto Chumash Ojai , CA 93023 (805) 640-0481 (805) 216-1253 Cell

San Luis Obispo County Chumash Council Chief Mark Steven Vigil 1030 Ritchie Road Chumash Grover Beach CA 93433 cheifmvigil@fix.net (805) 481-2461 (805) 474-4729 - Fax

Santa Ynez Band of Mission Indians Vincent Armenta, Chairperson P.O. Box 517 Chumash Santa Ynez, CA 93460 varmenta@santaynezchumash.

, CA 93426

(805) 688-7997 (805) 686-9578 Fax Owl Clan Qun-tan Shup 48825 Sapaque Road Bradley , CA 93426 mupaka@gmail.com (805) 472-9536 phone/fax (805) 835-2382 - CELL

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009021059 Southern California Edison Company, Presidential Substation EIR: Ventura County.

Native American Contact List Ventura County September 26, 2011

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Chumash

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Chumash

Richard Angulo 2513 Laney Circle Denton , TX 76208

Chumash

Santa Ynez Tribal Elders Council Adelina Alva-Padilla, Chair Woman P.O. Box 365 Chumash Santa Ynez CA 93460 elders@santaynezchumash.org (805) 688-8446 (805) 693-1768 FAX

Randy Guzman - Folkes 655 Los Angeles Avenue, Unit E Moorpark , CA 93021 ndnRandy@yahoo.com (805) 905-1675 - cell

Chumash Fernandeño Tataviam Shoshone Paiute Yaqui Santa Ynez Band of Mission Indians Tribal Administrator P.O. Box 517 Chumash Santa Ynez , CA 93460 info@santaynezchumash. (805) 688-7997 (805) 686-9578 Fax

Coastal Band of the Chumash Nation Vennise Miller, Chairperson P.O. Box 4464 Chumash Santa Barbara CA 93140 805-305-5517

Carol A. Pulido 165 Mountainview Street Chumash Oak View , CA 93022 805-649-2743 (Home)

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tribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, tion 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

s list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed 1# 2009021059 Southern California Edison Company, Presidential Substation EIR: Ventura County.

Comment Letter A1



Native American Contact List Ventura County September 26, 2011

Comment Letter A1

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Frank Arredondo PO Box 161 Chumash Santa Barbara Ca 93102 ksen_sku_mu@yahoo.com 805-617-6884 ksen_sku_mu@yahoo.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009021059 Southern California Edison Company, Presidential Substation EIR: Ventura County.

3.2-5

3.2.1 Letter A1 – Responses to Comments from Native American Heritage Commission (NAHC)

- A1-1 A project-specific records search was performed for the Proposed Project and alternatives at the South Central Coastal Information Center (SCCIC). The commenter is referred to page 4.5-5 of Draft EIR Section 4.5, *Cultural Resources*, which summarizes the results of the records search.
- A1-2 Archaeological field surveys and evaluations were performed for this project; the commenter is referred to pages 4.5-7 through 4.5-9 of Draft EIR Section 4.5, *Cultural Resources.* As described in the Draft EIR, a Phase 1 archaeological survey was conducted in July and August, 2008, by PCR Services Corporation, and no new cultural resources were located within the project area. An additional Phase 1 pedestrian survey was conducted on May 29, June 16, and June 19, 2010, for additional project areas not surveyed during the July and August survey. One isolated prehistoric artifact was recorded (a granitic mano), which was not eligible for listing in the California Register of Historical Resources and is not considered a historic resource or unique archaeological resource under CEQA. In 2010, Phase II archaeological testing was conducted at the CA-VEN-744 and CA-VEN-1571 archaeological sites. Phase II archaeological testing indicated that site CA-VEN-744 is eligible for listing in the California Register of Historical Resources under Criterion 4 (i.e., it has yielded or is likely to yield information important in prehistory or history). Site CA-VEN-1571 had previously been recommended eligible for listing in the California Register of Historical Resources under Criterion 4, and remains eligible. However, the portion of the site within the project area "lacks sufficient density, diversity and integrity, and therefore does not contain data that contributes to the significance of VEN-1571' (Sander et al, 2010:32)".

As described in the first paragraph on Draft EIR page 4.5-1, three reports were prepared that summarize the results of these field efforts, and Draft EIR Section 4.5, *Cultural Resources* is based on these studies: *Phase I Cultural and Paleontological Resources Assessment, Proposed Southern California Edison Presidential Substation Project* (Rockman et al., 2009); *Supplemental Cultural Resources Survey for Southern California Edison Presidential Substation Project*, *Ventura County* (Honey, 2010); and *Testing Report and Evaluation of Archaeological Sites CA-VEN-744 and CA-VEN-1571, Southern California Edison Presidential Substation Project, Ventura County, California* (Sander et al, 2010).

A1-3 The Native American Heritage Commission (NAHC) was contacted and performed a Sacred Lands File (SLF) search for the Proposed Project. Native American contacts recommended by the NAHC were contacted to provide input on the Proposed Project. The NAHC did not indicate that there were any known Native American cultural or sacred sites within the project area. The commenter is referred to page 4.5-6 and 4.5-7 of Draft EIR Section 4.5, *Cultural Resources*, which summarizes the results of the NAHC SLF search and the Native American contact program.

 A1-4 The commenter is referred to Draft EIR Section 4.5, *Cultural Resources*, Mitigation Measures 4.5-2a, 4.5-2b, and 4.5-4. Mitigation Measure 4.5-2a requires archaeological and Native American monitors to be present during project-related ground disturbance. Mitigation Measure 4.5-2b provides contingency measures for the accidental discovery of cultural resources during project implementation. Mitigation Measure 4.5-4 provides contingency measures for the discovery of human remains during project implementation.

EDMUND G. BROWN, JR., Governor

Flex your power!

A2-2

Be energy efficient!

Comment Letter A2

DEPARTMENT OF TRANSPORTATION DISTRICT 7, OFFICE OF REGIONAL PLANNING **IGR/CEQA BRANCH** 100 MAIN STREET, MS # 16 LOS ANGELES, CA 90012-3606 PHONE: (213) 897-9140 FAX: (213) 897-1337

October 7, 2011

Ms. Juralynne Mosley California Public Utilities Commission 505 Van Ness Ave., 4th Floor San Francisco, CA 94102

> Re: Southern California Edison Company Presidential Substation DEIR IGR/CEQA No. 110938/DW Vic.: SR-23, SR-118 SCH No. 2009021059

Dear Ms. Mosley:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above mentioned project. The proposed project is to construct a new 66/16 kilovolt (kV) distribution substation and associated 66 kV transmission lines, telecommunications connection, and related distribution components in the City of Thousand Oaks and unincorporated Ventura County.

Please note that any work to be performed within the State Right-of-Way will require a Caltrans A2-1 Encroachment Permit. A construction traffic management plan will be necessary for any lane closures or street detours that would impact the flow of traffic on SR-23 and SR-118.

Please limit construction related truck trips on State highways to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will require a Caltrans Transportation Permit.

A Stormwater Management Plan may be necessary to control the discharge of stormwater A2-3 runoff from the project, as diversion of flow onto State facilities is generally not acceptable.

If you have any questions regarding these comments, you may contact me at (213) 897-9140 and refer to IGR/CEQA No. 110938DW.

Sincerely,

Cenno later

DIANNA WATSON IGR/CEQA Program Manager Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

3.2.2 Letter A2 – Responses to Comments from California Department of Transportation (Caltrans)

- A2-1 The Draft EIR discloses required permits and approvals in Table 2-10, *Summary of Permit Requirements*, including encroachment permits necessary from Caltrans, the City of Thousand Oaks, the City of Simi Valley, and Ventura County. The Applicant would obtain permits from Caltrans as needed, for work performed in the Highway 23 roadway. In addition, the Draft EIR's Mitigation Measure 4.15-1b requires that SCE prepare and implement a Traffic Management Plan subject to approval of the appropriate state agency and/or local government(s).
- A2-2 As stated on page 4.15-10 of the Draft EIR, the increased traffic generated by Proposed Project construction would fall within the daily fluctuations of traffic volumes for the highway and arterial roadways in the area. Therefore, this shortterm increase in vehicle trips would not significantly affect level of service and traffic flow on roadways. However, it is acknowledged that truck traffic during peak commute hours on State highways could affect traffic flow. The following bullet has been added to Mitigation Measure 4.15-1b (Draft EIR page 4.15-12):
 - <u>Limit construction-related truck traffic on State highways to off-peak</u> <u>traffic hours to the extent feasible.</u>

The requirement to obtain a Transportation Permit from Caltrans for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles is described on page 4.15-6 of the Draft EIR.

A2-3 The Proposed Project does not propose to discharge storm water, or otherwise divert flow, onto State facilities. As discussed on Draft EIR pages 4.9-12 and 4.9-25 through 4.9-27, the Proposed Project would need to implement storm water management measures per the requirements and standards set forth in the Ventura County MS4 Permit and the subsequent guidance provided by the *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures* (Ventura County TGM).

Comment Letter A3



October 11, 2011

Ms. Juralynne Mosley Presidential Substation Project c/o Environmental Science Associates 1425 N. McDowell Blvd, Suite 200 Petaluma, CA 94954

SUBJECT: DRAFT EIR FOR THE PRESIDENTIAL 66/16 KILOVOLT SUBSTATION PROJECT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Mosley:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Presidential Substation project. It is our understanding that the project continues to propose a new substation on the south side of Olsen Road in the City of Thousand Oaks just west of the City of Simi Valley city limits. Subtransmission lines are proposed to follow Sunset Valley Road and Read Road and proceed east, crossing under State Highway 23, to the proposed substation site. The lines would run parallel to Olsen Road (and cross it along that corridor) for approximately one-quarter mile from the water tank on the Day Ranch property to the proposed substation.

The City of Simi Valley has previously provided comments on the project and its potential to impact our community. We expressed concerns regarding the potential visual impacts of the substation facility and the above ground subtransmission lines. We requested that mitigation be provided to screen the substation entirely from the adjacent roadway and properties using screening methods that include extensive landscaping including large trees, and a berm and wall that are tall enough to block the view of the equipment from Olsen Road. The landscaping should include trees along the entire street frontage that are at least 48"-box in size and spaced 20' on center when planted. In order to mitigate the visual impacts of the subtransmission lines, we requested that the project underground the portion of the subtransmission lines that would parallel and cross Olsen Road. In addition, we requested that Alternate Substation Site B be excluded from consideration because the City is the property owner and would not consider allowing such a use on the property.

The City Council discussed the Draft EIR at its meeting of October 10, 2011 and determined that some of the City's concerns have not been addressed adequately in the document. The following comments are provided for inclusion in the Final EIR and consideration of the California Public Utilities Commission (CPUC).

Proposed Substation

The analysis of the aesthetic impacts of the substation concludes that the facility would "substantially alter the intrinsic character and composition of the existing view..." In addition the same analysis concludes that "the resulting visual impact would be adverse and potentially significant." However,

A3-4

A3-1

A3-2

A3-3

Bob Huber, Mayor Steven T. Sojka, Mayor Pro Tem Barbra Williamson, Council Member Glen T. Becerra, Council Member Mike Judge, Council Member

P 49a/9-11 (klk)

) 2929 Tapo Canyon Road, Simi Valley, CA 93063-2199 805.583.6700 www.simivalley.org

Comment Letter A3

A3-5

A3-6

A3-7

Environmental Science Associates Attn: Ms. Juralynne Mosley Page 2 of 2

the analysis fails to provide the mitigation that the City previously requested to address the potential impact including the large trees, berm and wall. There is no discussion as to why the mitigation measures suggested by the City are not feasible. Because the DEIR fails to mitigate potentially significant impacts with feasible mitigation it does not comply with the requirements of the California Environmental Quality Act. Any Statement of Overriding Considerations that might be considered by the CPUC for aesthetic impacts would be unsupportable due to this flaw in the DEIR.

System Alternative B

This Alternative is identified as the environmentally superior alternative in the DEIR. Under this alternative, no new facilities would be constructed, and all changes would take place on and around existing facilities at the Royal, Thousand Oaks, and Potrero Substations. Existing transformers would be replaced with larger ones. The DEIR states that operation of this alternative would not affect scenic vistas, scenic resources, or the existing visual character of the surrounding area, and would not create any additional source of light or glare. The screening analysis in the DEIR indicates that this alternative meets most project objectives, feasibility criteria, and environmental criteria. The City urges that this alternative be approved by the CPUC. We understand that the equipment involved would not be standard Edison equipment, but the substantial reduction in air quality, noise, and aesthetic impacts justifies its implementation.

Alternative Subtransmission Alignment 3

This alternative would underground the transmission lines from the substation site to the intersection of Read Road and Sunset Valley Road. This alternative implements the City's previous request for undergrounding of the transmission lines to eliminate significant aesthetic impacts along Olsen Road. If System Alternative B is not selected, the City urges that Alignment 3 be required by the CPUC instead of the proposed project.

Alternative Substation Site B

The document does not acknowledge the concerns raised by the City regarding Alternative Substation Site B at the former Sheriff station. This site is proposed for a hotel/resort in the Simi Valley General Plan Update currently being prepared. It is currently used for overflow parking for events at the Ronald Reagan Presidential Library. Placement of an electrical substation at this site would restrict current and future uses. The discussion of the feasibility of this alternative on pages 3-24 should disclose that the City has already stated its opposition to use of the site for a substation.

Thank you for the opportunity to comment on the Draft EIR. If you have any questions regarding these comments, please do not hesitate to contact me at (805) 583-6701 or Peter Lyons, Director of Environmental Services, at (805) 583-6875.

Sincerely, Haldher

Robert O. Huber Mayor

> cc: City Council City Manager City Attorney Director of Environmental Services

3.2.3 Letter A3 – Responses to Comments from City of Simi Valley

- A3-1 The comment summarizes the City of Simi Valley's understanding of the Proposed Project. This comment is noted.
- A3-2 The comment expresses concerns regarding the potential visual impacts of the proposed Presidential Substation facility and the above ground subtransmission lines, and suggests mitigation to screen the substation entirely from the adjacent roadway and properties such as through extensive landscaping including large trees, and a berm and wall that are tall enough to block the view of the equipment from Olsen Road. The commenter suggests that landscaping include trees along the entire street frontage that are at least 48-inch box in size and spaced 20 feet on center when planted. The commenter's suggestions were considered during analysis of aesthetic impacts in the Draft EIR, as similar suggestions were contained in the commenter's letter submitted during the scoping period, dated September 23, 2010.

The proposed Presidential Substation site is within the jurisdiction of the City of Thousand Oaks. As such, specific plans for landscaping, including final wall design and tree species, are based on guidelines from the City of Thousand Oaks, and would be subject to approval by the City of Thousand Oaks in connection with approval of the grading permit. As stated in Draft EIR, Chapter 2, Project Description (page 2-15), "Plants would be installed and maintained only outside the north and east perimeter walls, as the south and west walls are generally not visible from local roadways...The preliminary landscaping plan includes a mixture of groundcover, shrubs, and trees based on the City of Thousand Oaks guidelines and standards for landscape plantings... Prior to the start of the proposed Presidential Substation construction, SCE would consult with the City of Thousand Oaks to develop an appropriate landscaping plan and perimeter wall design that would be submitted with the grading permit application for the Proposed Project." Table 2-3 contains a list of proposed landscape plantings, including the type of plant, height at installation, and height at maturity. Draft EIR Figures 4.1-7a, 4.1-7b, and 4.1-7c show simulations of the view from Olsen Road looking south toward the proposed Presidential Substation site one to two years following construction, five to ten years following construction, and at full growth.

Because of the location of the proposed Presidential Substation site, the City of Thousand Oaks is the appropriate agency to provide design guidance and standards during development of the substation's landscaping plan, and the Final EIR will not be amended to include the specific planting suggestions provided by the commenter. However, to ensure that the proposed Presidential Substation is screened to the maximum extent feasible the following language has been added under Impact 4.1-8 (Draft EIR page 4.1-56 and 4.1-57):

...Ultimately, the visual contrast would be moderate, as the Substation would attract attention, but would not demand the viewer's attention. In addition, the project would co-dominate the landscape with the surrounding hillsides. Overall visual change would consequently be moderate. However, in consideration of as indicated by the site's scenic zoning designation, the site is a visually sensitive location, and the resulting visual impact would be adverse and potentially significant.

As described in Chapter 2, Project Description, prior to the start of the proposed Presidential Substation construction, SCE would submit a landscaping plan and perimeter wall design to the City of Thousand Oaks for review and approval as part of the grading permit application for the Proposed Project. Mitigation Measure 4.1-8a would ensure that this design development and review process considers the need to maximize screening of the Substation using trees, shrubs, other landscaping, and appropriate wall design. In addition, Mitigation Measures 4.1-8ab would require measures to reduce pole visibility (i.e., self-weatherizing steel or appropriate colors, finishes, textures, as well as non-specular and non-reflective materials), to lessen views of the Proposed Project from sensitive viewers. However, even with implementation of Mitigation Measures 4.1-8a and 4.1-8b, the Proposed Project would substantially alter the intrinsic character of the existing roadway view in terms of its composition and the general scale of landscape elements. As shown in Figures 4.1-7a and 4.1-7b, the poles reaching above the Substation would be viewed from a low vantage point by motorist, and could be against a backdrop of the sky. Implementation of this these mitigation measures would not reduce this impact below a significant level; therefore the impact would remain significant and unavoidable.

Mitigation Measure 4.1-8a: SCE will submit to the City of Thousand Oaks a landscaping plan and perimeter wall design that maximizes screening of the Presidential Substation using trees, shrubs, other landscaping, and appropriate wall design, as part of the grading permit application for the Project.

Mitigation Measure 4.1-8ab: Implement Mitigation Measure 4.1-2b and Mitigation Measure 4.1-3b.

Significant <u>Significance</u> After Mitigation: Significant Unavoidable.

In addition, the Draft EIR proposes mitigation measures that would further lessen impacts from construction and operation of the proposed Presidential Substation site. For example, Mitigation Measures 4.1-3b would ensure that all pole structures that are visible from Olsen Road would be treated with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape. (Mitigation Measure 4.1-3b has been revised; see Response SCE-T-107 and Response SCE-T-112 for the revised language.) Mitigation

Measure 4.1-5 would ensure that the temporary fencing used during construction at the site would incorporate aesthetic treatment. Mitigation Measure 4.1-9a, 4.1-9b, and 4.1-9c would reduce impacts from lighting at the substation.

A3-3 The commenter expresses support for an alternative that would underground the portion of the subtransmission lines that would parallel and cross Olsen Road. Comment noted. For additional information on the alternatives analyzed in the Draft EIR, including undergrounding options, see Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 3, *Undergrounding*, in Section 3.1.3.

The comment further requests that Alternative Substation Site B be excluded from consideration because the City is the property owner and would not consider allowing such a use on the property. Commented noted. See Response A3-7.

- A3-4 For a discussion on proposed landscaping and mitigation to screen the proposed Presidential Substation, see Response A3-2.
- A3-5 The comment expresses support for System Alternative B. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1.
- A3-6 The comment expresses support for Alternative Subtransmission Alignment 3, in the event that System Alternative B is not selected. Comment noted. See Master Response 1, *Alternatives* in Section 3.1.1.
- A3-7 The commenter notes that the City of Simi Valley has stated its opposition to Alternative Substation Site B, because it would be located on a site proposed for a hotel/resort in the Simi Valley General Plan Update that was being prepared at the time the comment letter was written, and because the site is currently used for overflow parking for events at the Ronald Reagan Presidential Library. The commenter states that placement of an electrical substation at the proposed site would restrict current and future uses.

The comment letter was submitted in October of 2011. Since this time, the City of Simi Valley published its Simi Valley 2030 General Plan Update in June of 2012 (City of Simi Valley, 2012a). The 2030 General Plan Update does propose new uses at the Alternative Substation Site B location. This response discusses the effects of the 2030 General Plan Update on the Draft EIR analysis of land use issues, and addresses the commenter's concern about restriction of current and future land uses.

As described on Draft EIR page 4.10-3, the CPUC "has sole and exclusive jurisdiction over the siting and design of the Proposed Project and alternatives because it authorizes the construction, operation, and maintenance of investor-owned public utility facilities." Although the Proposed Project and alternatives would be exempt from local land use and zoning regulations and discretionary permitting, General Order No. 131-D, Section XIV.B requires that in locating a project "the public utility shall consult with local agencies regarding land use matters."

Draft EIR Section 4.10, Land Use and Planning, provides a land use consistency analysis for informational purposes. This analysis considers the existing physical setting (baseline conditions as determined pursuant to §15125(a) of the State CEQA Guidelines) that may be affected by the Proposed Project and alternatives. As discussed on Draft EIR pages 4-2 and 4-3, "pursuant to CEQA Guidelines (§15125[a]), the environmental setting used to determine the impacts associated with the Proposed Project and alternatives is based on the environmental conditions that existed in the study area in February 2009 at the time the Notice of Preparation was published." As such, the Draft EIR analyzes the potential impacts of Alternative Substation Site B in relation to the City of Simi Valley General Plan current in February 2009, which was the version adopted in 1988 (City of Simi Valley, 1988). The analysis also relies on information in the Simi Valley General Plan Update, Final Technical Background Report, published in October 2007 (City of Simi Valley, 2007); the City Municipal Code, adopted in January 2006 (City of Simi Valley, 2006); and the Wood Ranch Specific Plan, adopted in August 1980 and reformatted and published in July 2003 (City of Simi Valley, 2003).

Because the analysis of each issue area is based on a comparison to baseline conditions (i.e., February 2009), the 1988 Simi Valley General Plan is the appropriate local plan for analysis of the Alternative Substation Site B. As such, the impact conclusions in Draft EIR Section 4.10, *Land Use and Planning*, do not change (Draft EIR page 4.10-18): "Alternative Substation Site B would not physically divide an established community; no local land use plans, policies and regulations, including discretionary permit requirements, would apply; and no HCPs or NCCPs cover lands within the Alternative Substation Site B (No Impact)."

Nevertheless, in June of 2012 the City of Simi Valley adopted the 2030 General Plan Update and Ordinance Number 1193 approving zone change Number Z-S-689, which updated the City's zoning maps (City of Simi Valley, 2012a and 2012b, respectively). For informational purposes, this response provides a land use consistency analysis with the 2030 General Plan Update and corresponding zoning changes.

The 2030 General Plan Update changed the land use designation of the parcel on which Alternative Substation Site B would be located. Formerly designated as *Institutional/Public* (City of Simi Valley, 2007), the site is now designated as *General Commercial (0.30 FAR*¹):

¹ According to the City of Simi Valley 2012 General Plan Update, "Standards of building intensity for nonresidential uses such as commercial, industrial, and mixed-use, are stated as a maximum Floor Area Ratio (FAR)... The Floor Area Ratio for a project is the ratio of gross floor area within the structure to total site area. Floor area does not include area within parking structures. Thus a single-story structure that covers 25 percent of a site has an FAR of 0.25. A two-story structure covering 25 percent of the site has an FAR of 0.5."

"General Commercial centers shall be designated to serve five purposes: (a) satisfy the daily shopping needs of a localized (1- to 2-mile radius) trade area, (b) a major center to serve the needs of the entire Simi Valley market region, (c) set aside land for a broad range of commercial offices, (d) allow the location of new automobile dealership(s) in specified overlay areas, and (e) encourage spending by travelers passing through Simi Valley on SR-118. The types of stores suited for localized shopping needs include supermarkets, drug stores, quick-stop markets, small restaurants, personal services and small specialty retail shops, the types of facilities which would serve travelers include coffee shops and restaurants, gas stations, specialty retail shops and entertainment. Projects in this category should not exceed two stories in height." (City of Simi Valley, 2012a)

The 2030 General Plan Update does not discuss the allowance or disallowance of transmission or subtransmission line facilities within this designation.

The parcel on which Alternative Substation Site B would be located is also within an area designated for *Transformation – New Growth*. This designation is for existing vacant areas expected to experience change as new development occurs over time. Specifically, the parcel is in the southwest corner of a larger area designated as the *Ronald Reagan Presidential Library Visitor-Serving Area*, shown in the figure below (City of Simi Valley, 2012a). Alternative Substation Site B would be located on the parcel in red, designated as *General Commercial (0.30 FAR)*.

RONALD REAGAN PRESIDENTIAL LIBRARY VISITOR-SERVING AREA


The 2030 General Plan Update provides the following goal and policies related to the *Ronald Reagan Presidential Library Visitor-Serving Area*:

Policy LU-1.3 Development Priorities. Prioritize future growth as infill and redevelopment of existing developed areas re-using and, where appropriate, intensifying development of vacant and underutilized properties within the CURB². Allow for growth on the immediate periphery of existing development in limited designated areas, where this is guided by standards to assure seamless integration and connectivity with adjoining areas and open spaces...

Policy LU-2.4 Visitor-Serving Uses. Provide for visitor-serving commercial uses that respect and benefit from the presence of Simi Valley's natural setting and cultural resources, including the Ronald Reagan Presidential Library and Strathearn Historical Park.

Goal LU-29 Visitor-Serving Center. Development of properties adjoining the Ronald Reagan Presidential Library as a visitor-serving center capitalizes on the Library's presence, contributes tax revenue to support City services, and provides gathering places for the Simi Valley community.

Policy LU-29.1 Specific Plan. Prepare a specific plan to promote the development of a boutique or resort hotel, with restaurants, gift shops, and conference/community event facilities to support the adjoining Ronald Reagan Presidential Library.

In addition, Ordinance Number 1193 changed the zoning designation of the parcel on which Alternative Substation Site B would be located (City of Simi Valley, 2012b). Formerly zoned as *Residential-Low Density* with *Conditional Zoning*, the site is now zoned as *Commercial Planned Development (CPD)*. The *CPD* zoning district "is intended to encourage the development of attractive, innovative, and efficient commercial sites containing a broad range of retail, office and service commercial uses" (City of Simi Valley, 2012b). Public utility facilities and utility infrastructure are permitted uses within this designation.

Ultimately, despite the changes to the land use and zoning designation of the site on which it would be located, Alternative Substation Site B would not impact land use or planning. First, Alternative Substation Site B would not physically divide an established community. Second, this alternative would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The *General Commercial (0.30 FAR)* land use designation does not preclude the construction of utility-related infrastructure, and the *CPD* zoning designation would allow for construction of Alternative Substation Site B. Finally, no HCPs or

² CURB - City Urban Restriction Boundary

NCCPs cover lands within the Alternative Substation Site B. As such, there would be no impact.

Nevertheless, the commenter is correct in asserting that construction of Alternative Substation Site B would affect current and future uses at the site. The effects of construction on current uses are addressed in Draft EIR Chapter 4, *Environmental Analysis*. Construction of Alternative Substation Site B would affect development of a portion of the *Ronald Reagan Presidential Library Visitor-Serving Area*, because the substation would use land that could otherwise be used for visitorserving purposes. The substation would not take up the entire *Ronald Reagan Presidential Library Visitor-Serving Area*, but would occupy the parcel in the southwest corner, which is less than one-tenth of the total area. The Final EIR concludes that Alternative Substation Site B is a component of the Environmentally Superior Alternative, and General Plan consistency is a factor to be considered in judging the feasibility of an alternative. Ultimately, the CPUC will weigh the effect of the updated Simi Valley General Plan policies in determining whether this alternative is feasible or infeasible.

Page 1 of 3

Comment Letter A4

From: Michael Manka

Sent: Monday, October 24, 2011 8:31 AM

To: Nisha Chauhan

Subject: FW: SCE Presidential Substation DEIR SCH 2009021059

Follow Up Flag: Follow up

Flag Status: Flagged

Please add this to the comments

Mike Manka ESA 707-795-0908

mmanka@esassoc.com

From: Mosley, Juralynne B. [mailto:juralynne.mosley@cpuc.ca.gov]
Sent: Friday, October 21, 2011 5:39 PM
To: Michael Manka
Cc: Nisha Chauhan
Subject: FW: SCE Presidential Substation DEIR SCH 2009021059

Mike,

FYI - I received this email from the Dept. of Fish/Game. Just keeping you in the loop

A4-2

Lynne

From: Daniel Blankenship [mailto:DSBlankenship@dfg.ca.gov]
Sent: Thursday, October 20, 2011 3:07 PM
To: Mosley, Juralynne B.
Subject: SCE Presidential Substation DEIR SCH 2009021059

Dear Ms. Mosley:

Thank you for the opportunity to comment on the NOP and now on the DEIR for the above referenced project related to potential biological impacts. The Department concurs with the biological mitigation measures and acknowledges that a streambed alteration agreement notification will be needed related to potential impacts to Department jurisdictional riparian areas. The Department concurs with the DEIR analysis that the Alternative Substation Site B / System Alternative B is the environmentally superior alternative due the fact that there would be less potential to impact sensitive biological resources and supports that alternative.

The Department acknowledges the botanical and wildlife surveys conducted to help evaluate potential impacts of the project. The Department acknowledges that there is a low likelihood that least Bell's vireo, a State listed endangered species, may occur within roadside riparian habitat on Alternative subtransmission alignment 2 and that focused surveys were not performed on this alignment. The Department recommends that protocol level surveys be conducted within this roadside riparian habitat if this alternative or the proposed project has any potential to directly or indirectly impact potential least Bell's vireo habitat within the project footprint or within a 500 foot buffer adjacent to the project. All information obtained from the surveys should be provided to the Department and the USFWS through a coordination process for evaluation and comment prior to project construction.

The Department acknowledges that Coastal California gnatcatcher, a federally-listed Threatened species and a California Species of Special Concern, was observed during surveys in 2010 within portions of the proposed project area. As noted in the DEIR, in California, this subspecies is an obligate resident of coastal sage scrub vegetation types. This species has been reported approximately 1 mile from the Proposed Project and alternatives. Focused surveys to determine the presence of this species were conducted 14 times during the summer and autumn of 2008 and 9 times in 2010. Moderately suitable habitat for this species occurs in the coastal sage scrub and disturbed coastal sage scrub on the proposed Presidential Substation site; however, use of this area was not detected during focused surveys. A juvenile California gnatcatcher was detected from coastal sage scrub/coastal prickly pear succulent scrub habitat located about 1,100 feet southwest of the proposed Presidential Substation site. Surveys did not detect this species on the proposed subtransmission alignment, Alternative Subtransmission Alignment 2, Alternative Subtransmission Alignment 3, or at Alternative Substation Site B. The species was observed at two separate locations within Alternative Subtransmission Alignment 1 near Esperance Road. The Department recommends that prior to construction (depending upon the alternative selected) additional protocol level coastal California gnatcatcher surveys be conducted within suitable coastal sage scrub habitat within with the project footprint, including a 500 foot buffer adjacent to the project. All information obtained from the surveys should be provided to the Department and the USFWS through a coordination process for evaluation and comment prior to project construction. Please continue to coordinate with Dan Blankenship regarding biological resources as this project moves forward.

Daniel S. Blankenship Staff Environmental Scientist CA Department of Fish and Game P.O. Box 221480 Newhall, CA 91322-1480 phone/fax (661) 259-3750 cell (661)644-8469 dsblankenship@dfg.ca.gov

3.2.4 Letter A4 – Responses to Comments from California Department of Fish and Game³ (CDFG)

- A4-1 The comment states that the California Department of Fish and Game (CDFG) concurs with the biological mitigation measures presented in the Draft EIR as they relate to mitigating project impacts, and that CDFG concurs with the Draft EIR analysis that Alternative Substation Site B / System Alternative B is the Environmentally Superior Alternative. Comment noted, but the commenter is referring to two different alternatives. In the Draft EIR, System Alternative B was recognized as the Environmentally Superior Alternative. In the Final EIR, the combination of Alternative Substation Site B and Alternative Subtransmission Alignment 3 is identified as the Environmentally Superior Alternative. See Master Response 1, *Alternatives* in Section 3.1.1 for additional information and details regarding the elimination of System Alternative B from the Final EIR, and selection of Alternative Substation Site B/Alternative Subtransmission Alignment 3 as the Environmentally Superior Alternative B from the Final EIR, and selection of Alternative Substation Site B/Alternative Subtransmission Alignment 3 as the Environmentally Superior Alternative Subtransmission Alignment 3 as the Environmentally Superior Alternative.
- A4-2 The comment notes that if Alternative Subtransmission Alignment 2 is selected and impacts to roadside riparian habitat are anticipated, CDFG recommends that protocol-level surveys be performed for least Bell's vireo. If this alternative alignment is selected, as described in the Draft EIR, no direct or indirect impacts would occur to least Bell's vireo or associated riparian habitat because project facilities would be sited greater than 50 feet from riparian corridors, or, if activities are proposed within 50 feet the Applicant shall perform a protocol-level habitat assessment and coordinate the findings with CDFG and the USFWS, as required by Mitigation Measure 4.4-10a. Construction activities near the drainage would occur outside the February 1 to August 31 least Bell's vireo breeding season, as required by Mitigation Measure 4.4-10a, so that direct impacts would not occur to nesting vireos.
- A4-3 The comment summarizes the methods and findings of protocol-level coastal California gnatcatcher surveys that were presented in the Draft EIR, and recommends that additional protocol-level surveys be conducted within suitable habitat and submitted for CDFG and U.S. Fish and Wildlife Service (USFWS) review prior to construction, depending upon the selected alternative. Draft EIR Section 4.4, *Biological Resources*, Impact 4.4-2 was updated, subsequent to receipt of 2012 survey results for coastal California gnatcatcher in the project area.

The second paragraph under the heading Coastal California Gnatcatcher, page 4.4-19, is revised as follows:

³ Effective January 1, 2013, California's Department of Fish and Game (CDFG) is now called the Department of Fish and Wildlife (CDFW). Because CDWF's comments were received prior to the name change, this document refers to the Department as CDFG.

Moderately suitable habitat for this species occurs in the coastal sage scrub and disturbed coastal sage scrub on the proposed Presidential Substation site; however, use of this area was not detected during focused surveys. A In 2010, a juvenile California gnatcatcher was detected from coastal sage scrub/coastal prickly pear succulent scrub habitat located about 1,100 feet southwest of the proposed Presidential Substation site (Bonterra, 2010a). Follow-up surveys in 2012 found two pairs of coastal California gnatcatchers on the Proposed Substation Site and one pair was observed on the proposed subtransmission alignment (Bonterra, 2012). Surveys did not detect this species on the proposed subtransmission alignment, Alternative Subtransmission Alignment 2, Alternative Subtransmission Alignment 3, or at Alternative Substation Site B.

The fourth paragraph of Impact 4.4-2 on page 4.4-36 was updated as follows:

About 3.5 acres of coastal sage scrub habitat on the proposed Presidential Substation site is suitable to support coastal California gnatcatcher and would be removed by the Proposed Project. Protocol-level surveys were performed in this area in 2008, and again in 2010 and 2012, and gnatcatchers were not observed on orand adjacent to the site. However, a juvenile California gnatcatcher was detected about 1,100 feet from the site in association with coast sage scrub/coast prickly pear succulent scrub habitat. On the basis of this finding, there is potential that Based on these findings, coastal California gnatcatchers could breed on or adjacent to the Proposed Presidential Substation site at a later date. Protocol-level surveys for coastal California gnatcatcher surveys also considered the proposed subtransmission alignment; however, this species was not detected and is considered absent from the alignment. Because the gnatcatcher was not identified on the Proposed Presidential Substation site during protocol-level surveys and the site is outside of designated critical habitat for this species, and a gnatcatcher pair was detected on this alignment as well. Based on these findings, the USFWS and CDFG may concur with survey findings and not require compensation for formal consultation for coastal California gnatcatcher impacts and coastal sage scrub habitat losses under the FESA.

Consistent with the comment, preconstruction bird surveys shall be performed prior to construction as required by Mitigation Measure 4.4-3.

Comment Letter A5



City of Moorpa

COMMUNITY DEVELOPMENT DEPARTMENT PLANNING -- BUILDING AND SAFETY -- REDEVELOPMENT AGENCY - CODE COMPLIANCE 799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

October 24, 2011

Ms. Juralynne Mosley **Presidential Substation Project** c/o Environmental Science Associates 1425 North McDowell Boulevard, Suite 200 Petaluma, CA 94954

Dear Ms. Mosley:

Re: Presidential Substation Draft EIR, September 2011

Thank you for the opportunity to provide input on the Draft EIR for the Presidential Substation project. The Moorpark City Council and staff have reviewed the Draft EIR, and continue to have the same comments as expressed in previous correspondence, including the December 22, 2009 letter from the Mayors of Moorpark, Simi Valley, and Thousand Oaks requesting that the transmission lines associated with this project be constructed underground to preserve the quality of the open space in the Tierra Rejada Valley. The following detailed comments are provided:

- A5-0
- The draft has not adequately addressed our comments raised during scoping, the T 1. City of Moorpark recommended analyzing a project alternative which includes full undergrounding of the 66kV transmission lines through the Tierra Rejada Valley. This alternative was described on pages 3-26 and 3-27, as Alternative Subtransmission Alignment 4 which was eliminated from consideration in the EIR because impacts to air quality, and noise resources would increase and an A5-1 additional potentially significant cultural resources impact would occur. In addition, the impacts on aesthetic resources would not be reduced more than under Alternative Subtransmission Alignment 3 which also reduced noise and air quality impacts and was carried forward for analysis. We request that the EIR include Alternative Subtransmission Alignment 4 as an alternative and analyze in more detail its potential for reducing long-range aesthetic impacts on the Tierra Rejada Valley. During scoping, the City also recommended a 66kV pole route location alternative, where the new lines would follow the existing north-south 66kV lines to the west of the Tierra Rejada Valley from Tierra Rejada Road to Read Road instead of creating a new path along Sunset Valley Road; from Read Road east, this alternative should have been explored as both an underground and an aboveground line. This requested alternative was not evaluated in the EIR, even though we believe it may show a significant reduction in project impacts to the Tierra Rejada Valley, thereby improving the decision-making process on this project with this being analyzed as a reasonable alternative.

KEITH F. MILLHOUSE Mayor Pro Tem

ROSEANN MIKOS, Ph.D. Councilmember

MARK VAN DAM Councilmember

October 24, 2011 Ms. Mosley Page 2

- 2. The Draft EIR does not adequately address the City's scoping comments previously submitted, because it does not provide an alternative for the full undergrounding of the new 66kV and 16kV transmission lines through the Tierra Rejada Valley. Also, The EIR alternatives do not include a 66kV pole route location alternative, where the new lines would follow the existing north-south 66kV lines to the west of the Tierra Rejada Valley from Tierra Rejada Road to Read Road instead of creating a new path along Sunset Valley Road. From Read Road east, this alternative should be explored as both an underground and an above-ground line. The City had originally requested that these alternatives be included and evaluated in the Draft EIR. These alternatives, if considered, may significantly reduce aesthetic project impacts to the Tierra Rejada Valley.
- 3. The Draft EIR indicates that wood poles are to be replaced and some of the steel poles will be between 1.5 and 2 feet in diameter and some will be between 2 and 4 feet in diameter; with the wider poles being between 60 and 100 feet high. Although A5-4 poles at either extreme in size may be found in the EIR to have significant adverse visual impacts as proposed, a 4' wide by 100' high pole would have much greater visibility than a 2' wide by 60' high pole. Since visual impacts of the poles are one of the most important issues to the public, aesthetic impacts related to proposed pole sizing should be included and detailed in the EIR analysis. Page 4.1-47 indicates that poles are to be made of self-weatherizing steel, which would oxidize to a natural-looking rust color within about one year. The EIR should provide a visual simulation of a new pole as compared with a pole that has oxidized for a year to show the reader the aesthetic characteristics of this proposed mitigation measure 4.1-2a. Please note, the size and scale of the visual simulations provided on figures 4.1-3 through Figures 4.1-8 are not adequate to demonstrate the simulated appearance of the before and after comparisons of proposed overhead utilities. Use of 11" x 17" pull-out photo simulations may improve the visual quality of comparison, because the existing photo simulations understate the visual impacts.
- 4. The Draft EIR lacked appropriate discussion about aesthetic impacts to the Tierra Rejada Greenbelt by not indicating the overall area to be highly sensitive visually; however, we concur with the overall assessment of the Draft EIR that the proposed project would have significant and unavoidable aesthetic impacts. Section 4.10, Land Use and Planning of the EIR analysis does not adequately address impacts on the Tierra Rejada Greenbelt, as can be referenced on page 4.10-5. Furthermore, Section 4.1 Aesthetics makes references to the presence of the Tierra Rejada Greenbelt but does not adequately address visual impacts on the rural character of the area, comprised of prime agricultural and other open space land uses.

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Comment Letter A5

October 24, 2011 Ms. Mosley Page 3

- 5. In light of the aesthetic impacts of the project, particularly to the Moorpark residents of the Serrenata neighborhood and to those residents traveling along Tierra Rejada road in Moorpark, the City of Moorpark supports the environmentally superior alternative: System Alternative B. While the Draft EIR indicates that this alternative A5-6 would not result in any significant unavoidable impacts as it does not involve the construction of a new substation, it would meet most of the basic project objectives compared to the Proposed Project, and other alternatives which involve construction of a new substation. The Draft EIR goes on to state that this Alternative would result These limitations need to be in reduced operational flexibility and reliability. analyzed in greater detail so that the public and decision makers have a real understanding of whether or not this alternative meets project objectives and is feasible. Should additional information on this environmentally superior alternative reveal that it is not feasible for any reason, the City of Moorpark requests that the alternatives analysis be revised and recirculated to further explore the alternatives that the City of Moorpark had originally requested, or that a new feasible alternative that avoids or greatly reduces visual impacts of the new power lines on Moorpark residents be included in the alternatives analysis.
- On page ES-6, there is a cutoff sentence, as follows: "On Tuesday, March 3, 2009 following the educational workshop"

If you have any questions, please contact Joseph R. Vacca, Principal Planner at (805) 517-6236 or by e-mail at <u>jvacca@ci.moorpark.ca.us</u>.

Respectfully,

David A. Bobardt Community Development Director

Attachments:

- 1. September 24, 2010 Scoping Letter (with attachments)
- cc: Honorable City Council Honorable Planning Commission Honorable Supervisor Peter Foy Steven Kueny, City Manager Mike Sedell, City Manager, City of Simi Valley Scott Mitnick, City Manager, City of Thousand Oaks File Chron

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Comment Letter A5



City of Moorpan

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING - BUILDING AND SAFETY - CODE COMPLIANCE 799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

September 24, 2010

Ms. Juralynne Mosley Presidential Substation Project c/o Environmental Science Associates 1425 N. McDowell Blvd, Suite 105 Petaluma, CA 94954

Dear Ms. Mosley,

Re: Supplemental Public Scoping for Presidential Substation EIR

Thank you for the opportunity to provide scoping input on the EIR for the revised Presidential Substation project. The Community Development Department has reviewed the revised and more-detailed project plans, and continues to have the same comments as expressed in its March 17, 2009 e-mail, as well as the December 22, 2009 letter from the Mayors of Moorpark, Simi Valley, and Thousand Oaks requesting that the transmission lines associated with this project be constructed underground to preserve the quality of the open space in the Tierra Rejada Valley.

In addition to the addressing the comments previously submitted, the EIR needs to fully explore two alternatives which do not appear to be in the current list of project alternatives: 1) full undergrounding of the new 66kV transmission lines through the Tierra Rejada Valley, and 2) a 66kV pole route location alternative, where the new lines would follow the existing north-south 66kV lines to the west of the Tierra Rejada Valley from Tierra Rejada Road to Read Road instead of creating a new path along Sunset Valley Road. From Read Road east, this alternative should be explored as both an underground and an above-ground line. These alternatives, once evaluated in the EIR, may show a significant reduction in project impacts to the Tierra Rejada Valley, thereby improving the decision-making process on this project with a reasonable range of alternatives.

Finally, the revised project description indicates that some of the steel poles will be between 1.5 and 2 feet in diameter and some will be between 2 and 4 feet in diameter; the wider poles would be between 60 and 100 feet high. Although poles at either extreme in size may be found in the EIR to have significant adverse visual impacts as proposed, a 4' wide by 100' high pole would have much greater visibility than a 2' wide by 60' high pole. Since visual impacts of the poles are one of the most important issues to the public, pole sizing should be as specific as possible in the project description to improve the quality of the EIR analysis.

S:\Community Development\OTHER AGENCIES\CPUC\Presidential Substation\100924 Supplemental Scoping Comments.doc JANICE S. PARVIN **ROSEANN MIKOS** KEITH F. MILLHOUSE DAVID POLLOCK Mayor Mayor Pro Tem MARK VAN DAM Councilmember Councilmember Councilmember



A5-8

Please let me know if you have any questions.

Sincerely,

David A. Bobardt Community Development Director

Attachments:

- 1. March 17, 2009 e-mail
- 2. December 22, 2009 letter
- cc: Honorable City Council Honorable Planning Commission Steven Kueny, City Manager Mike Sedell, City Manager, City of Simi Valley Scott Mitnick, City Manager, City of Thousand Oaks File Chron

A5-8

Presidential Substation Project

From: David Bobardt [dbobardt@ci.moorpark.ca.us] Sent: Tue 3/17/2009 6:01 PM Presidential Substation Project To: A5-8 Cc: Subject: Notice of Preparation of an EIR for SCE Presidential Substation **Attachments:** Ms. Juralynne Mosley, Environmental Project Manager California Public Utilities Commission c/o Environmental Science Associates 1425 N. McDowell Blvd, Suite 105 Petaluma, CA 94954 RE: Notice of Preparation of an EIR for SCE Presidential Substation Project Dear Ms. Mosley, Please include the City of Moorpark Community Development Department on the notification list for the SCE Presidential Substation Project EIR, with notices addressed to my attention at the address and e-mail address below. The following comments are provided at this time for your consideration in the preparation of the EIR. Additional comments will be provided once the Draft EIR is reviewed by the City. 1. The new transmission lines through the Tierra Rejada Valley would be visible to residents in the Serenata neighborhood and to travelers along Tierra Rejada Road in Moorpark. The City has recently made a substantial investment in enhanced landscaping along the median of Tierra Rejada Road and at the SR-23/Tierra Rejada Road interchange to make this road more scenic. Although the new steel poles would be replacing existing wooden poles, they would be larger in diameter, taller in height, and more visible due to the higher reflectivity of steel over wood, making the new poles a more dominant feature of the landscape. This impact needs to analyzed and mitigation needs to be identified in the Draft EIR. The exact location of the substation was not clear from the exhibits on the project website. The City is requesting a 2. visual analysis to identify the areas from which the substation would be visible. Appropriate screening and landscaping should be considered as mitigation to minimize visual impacts. Please let me know if you have any questions. Respectfully,

David A. Bobardt Planning Director City of Moorpark 799 Moorpark Avenue Moorpark, CA 93021 (805) 517-6281 FAX (805) 532-2540 dbobardt@ci.moorpark.ca.us

https://exchange.esassoc.com/exchange/PresidentialSub/Inbox/Notice%20of%20Preparatio... 3/18/2009







December 22, 2009

Commissioner Grueneich California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3214

1 A5-8 🕆

RE: Request to Underground Transmission Lines Associated with Proposed Presidential Substation in the Tierra Rejada Valley Greenbelt Area (A.08-12-023)

Dear Commissioner Grueneich:

The Cities of Thousand Oaks, Simi Valley and Moorpark respectfully request that transmission lines associated with the proposed Presidential Substation (Application A.08-12-023) be located underground within the Tierra Rejada Valley Greenbelt.

The Tierra Rejada Valley is an unincorporated area located between the cities of Moorpark, Simi Valley and Thousand Oaks. The Tierra Rejada Valley Greenbelt was created by the County of Ventura and cities of Thousand Oaks and Simi Valley in 1983, to preserve the valley for open space and agricultural purposes. In 1984, the City of Moorpark became a signatory to the agreement.

The Presidential Substation, which is proposed by Southern California Edison, would replace smaller sub transmission poles in this area with approximately 3.4 miles of taller and larger transmission poles. These proposed transmission lines would cross Olsen Road and State Route 23, both of which are designated scenic highways in Thousand Oaks, and would be located near residential areas along Read Road in Thousand Oaks. The transmission lines would also traverse the Greenbelt along Sunset Valley Road, in close proximity to a working farm that attracts thousands of visitors each year. All of the proposed transmission lines are located within, at, or adjacent to the Tierra Rejada Valley Greenbelt, as shown in the attached Figure 4.1-1 from the Proponent's Environmental Assessment for the Presidential Substation Project.

This joint letter has therefore been prepared in order to underscore the importance of undergrounding any proposed transmission lines in the area of the Tierra Rejada Valley Greenbelt, and is consistent with previous requests by all three cities to underground

A5-8

Tri-City Request for Undergrounding of Transmission Lines December 22, 2009 Page 2 of 2

those portions of the transmission lines proposed near, or within, their cities. This request has been approved by our respective City Councils.

Thank you in advance for considering our request.

Sincerely,

Noan

Janice Parvin Mayor City of Moorpark Paul Miller Mayor City of Simi Valley

Dennis C. Gillette Mayor City of Thousand Oaks

Attachment

 cc: City Councils & City Managers of Moorpark, Simi Valley, and Thousand Oaks Albert Garcia, SCE Senior Attorney Janice Grau, CPUC ALJ
 Darryl Gruen, CPUC Legal Division Chloe Lukins, CPUC CEQA Unit Supervisor Christine McLeod, CPUC Project Manager- Regulatory Affairs Juralynne Mosley, CPUC Project Manager Michael Wheeler, Advisor to Commissioner Grueneich

SERVICE LIST

↑ A5-8

Juralynne Mosley Project Manager California Public Utilities Commission Energy Division, Area 4-A 505 Van Ness Avenue San Francisco, CA 94102-3214 ibm@cpuc.ca.gov

Christine McLeod Project Manager-Regulatory Affairs Regulatory Policy & Affairs Dept. Southern California Edison 2244 Walnut Grove Ave, Quad 3D, 388L Rosemead, CA 91770 christine.mcleod@sce.com

Albert J. Garcia Senior Attorney Environmental, Property and Local Governance Section, Law Department Southern California Edison 2244 Walnut Grove Avenue Rosemead, CA 91770 albert.garcia@sce.com

Chloe Lukins CEQA Unit Supervisor California Public Utilities Commission Energy Division, Area 4-A 505 Van Ness Avenue San Francisco, CA 94102-3214 olu@cpuc.ca.gov

Michael Wheeler Advisor to Commissioner Grueneich California Public Utilities Commission 505 Van Ness Avenue, 5th Floor San Francisco, CA 94102-3214 mmw@cpuc.ca.gov Darryl J. Gruen California Public Utilities Commission Legal Division, Room 4300 505 Van Ness Avenue San Francisco, CA 94102-3214 dig@cpuc.ca.gov

Janice L. Grau California Public Utilities Commission Division of Administrative Law Judges Room 5011 505 Van Ness Avenue San Francisco, CA 94102-3214 <u>ila@cpuc.ca.gov</u>

3.2.5 Letter A5 – Responses to Comments from City of Moorpark

A5-1 The commenter expresses concerns that the EIR does not contain an alternative evaluating full undergrounding of the 66 kV line through the Tierra Rejada Valley. The commenter also expresses concerns that the EIR does not contain an alternative evaluating a 66 kV route where new lines would follow the existing north-south 66 kV lines to the west of the Tierra Rejada Valley from Tierra Rejada Road to Read Road instead of creating a new path along Sunset Valley Road. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for information about alternatives analyses, and Master Response 3, *Undergrounding*, for a discussion on undergrounding in general.

Per CEQA Guidelines Section 15126.6, "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation...The lead agency is responsible for selecting a range of project alternatives for examination and must publically disclose its reasoning for selecting those alternatives."

Draft EIR, Chapter 3, Alternatives and Cumulative Projects, provides a description of sixteen potential alternatives for the Proposed Project, including an explanation of the approach and methods used to screen the feasibility of alternatives according to guidelines established under CEQA. The range of alternatives screened for feasibility included alternatives presented by SCE in its PEA and alternatives developed by the CEQA team, which took into consideration suggestions presented during the scoping period (February 17, 2009 – March 19, 2009) and during the supplemental scoping period (August 26, 2010 – September 25, 2010). Although the exact alternatives suggested by the commenter were not considered during the Draft EIR development, other alternatives were evaluated that include elements from the commenter's suggestion. Two alternative subtransmission alignments were evaluated that would minimize impacts to views from the City of Moorpark. Alternative Subtransmission Alignment 1 would eliminate the subtransmission alignment along Sunset Valley Road, and Alternative Subtransmission Alignment 2 would not be visible from the City of Moorpark at all. In addition, two alternatives were evaluated that include undergrounding all or portions of the subtransmission alignment. Alternative Subtransmission Alignment 3, which is the Environmentally Superior Alternative in this Final EIR, would underground the portion of the alignment from the intersection of Read Road and Sunset Valley Road east to the proposed Presidential Substation. Alternative Subtransmission Alignment 4 would underground the entire subtransmission alignment. The difference between Alternative Subtransmission Alignment 4 and the alternative suggested by the commenter is that, under Alternative Subtransmission Alignment 4, a portion of the underground alignment would occur along Sunset Valley Road instead of following the north-south alignment west of Moorpark Road suggested by the commenter. The above ground alternative alignment suggested by the commenter would result in the installation of larger tubular steel poles (TSPs) and a double circuit 66 kV line along Read Road between Moorpark Road and Sunset Valley Road, compared to the Proposed Project which would install light weight steel (LWS) poles and a single 66kV circuit along the same segment of Read Road.

The commenter states that the Proposed Project would create a new path along Sunset Valley Road. The Proposed Project would not create a new path along Sunset Valley Road, but rather would replace the existing poles within the current road ROW with new poles and a 66 kV line. The Draft EIR determined the impacts associated with this portion of the subtransmission alignment could be mitigated to less-than-significant levels.

- A5-2 See Response A5-1.
- A5-3 See Response A5-1.
- A5-4 The commenter requests that aesthetic impacts related to proposed pole sizing should be included and detailed in the EIR analysis. The Draft EIR provides all details that have been determined regarding proposed height and diameter of specific poles. Draft EIR Chapter 2, *Project Description*, Figures 2-9a though 2-9f portray the estimated height of each pole, as well as a height range of each type of pole type, while information on pole diameter is provided in Draft EIR Table 2-6, Typical Subtransmission Pole Metrics, and in Figure 2-8, Typical Transmission Pole Configuration. LWS poles would range from 61 to 75 feet high and 1.5 to 2 feet in diameter. No further details about the diameter or height of specific poles is available at this time, as that information is determined during final engineering.

Development of the visual simulations depicted in Draft EIR Figures 4.1-3 through 4.1-8 took into account the varying availability of data. The following updates have been made to Section 4.1, *Aesthetics*, page 4.1-36:

Of note, the heights of the LWS pole structures in the simulations are in the middle of the range of possible pole height, and not the maximum potential height. For example, LWS pole range is $\frac{65}{61}$ to 75 feet ags, whereas the poles in the simulation are 70 feet ags. The simulations $\frac{1}{60}$ represent the maximum middle range of potential TSP height of TSPs: the TSP range is $\frac{70 \text{ to } 75}{60 \text{ to } 100}$ feet ags, and the simulation poles are 75 feet ags (SCE, 2011).

The diameter of the poles portrayed in the simulations would be relative to the height of the poles being depicted. See Draft EIR Figure 2-8 for typical pole heights and diameters.

The commenter requests that the EIR provide a visual simulation of a new pole as compared with a pole that has oxidized for a year, to show the reader the aesthetic results of implementation of Mitigation Measure 4.1-2a. The commenter is referred to Response SCE-T-106. In response to information received from SCE in Comment SCE-T-106, Mitigation Measure 4.1-2a has been changed to no longer require self-weatherizing steel; rather, it now requires a surface coating with appropriate colors, finishes and textures, to blend the structures with visible backdrop landscape.

The commenter further states the opinion that the size and scale of the visual simulations provided in Draft EIR Figures 4.1-3 through 4.1-8 are not adequate to demonstrate the simulated appearance of the Proposed Project, and requests the use of 11 inch by 17 inch pull-out photo simulations. As stated on Draft EIR page 4.1-36, "Images were photographed in May and August of 2009 using a single lens reflex (SLR) camera. All the images use a 50mm lens which represents a horizontal view angle of 40 degrees, which is the normal field of view for the average human observer." As such, the simulated appearance of the Proposed Project, and will not be reprinted as a larger size in the Final EIR.

A5-5 The commenter expresses the opinion that the Draft EIR lacked appropriate discussion about the aesthetic impacts to the Tierra Rejada Greenbelt (Greenbelt) by not indicating the overall area to be highly sensitive visually. However, the visual attributes of the Greenbelt, including scenic attributes, are discussed throughout Section 4.1, Aesthetics, in both the visual setting and the discussion of impacts and mitigation measures. The Greenbelt is first described in the discussion of open space areas on Draft EIR page 4.1-3: "A significant portion of the study area falls within the Tierra Rejada Valley, an area in unincorporated Ventura County that is protected as part of the Tierra Rejada Valley Greenbelt Agreement. Greenbelt Agreements in Ventura County are created to maintain the integrity of separate, distinct cities and to prevent inappropriately placed development between city boundaries. These agreements protect agricultural lands and open space, as well as reassure property owners located within these areas that land will not be prematurely converted to uses which are incompatible with agriculture or open space uses (Ventura County, 2010a). Visual resources in the Tierra Rejada Greenbelt include open space, agricultural areas, equestrian centers, rolling hillsides, and rural residential developments."

Eight photos in the existing setting figures (Figure 4.1-2a through 4.1-2f) show views that include the Greenbelt: Photos 2, 3, 4, 5, 6, 8, 21, and 22. Additional descriptions

3.2 Agencies and Organizations Responses

of the visual resources within the Greenbelt, including visually scenic features such as open space, are provided on Draft EIR pages 4.1-11 through 4.1-13, under the descriptions of proposed subtransmission alignments along Read Road and Sunset Valley Road. As shown in Table 4.1-52, viewsheds that include the Greenbelt, consisting of Highway 23, Moorpark Road, Read Road, and Tierra Rejada Road, were determined to have representative visual quality, and visual sensitivity ranging from low to moderate-to-high, depending on view exposure conditions. Views from two of the designated scenic vistas with views of the Greenbelt have distinct visual quality, but low overall visual sensitivity because the Proposed Project would not be visible in the viewshed. Impacts to viewsheds that include the Greenbelt are analyzed under Impact 4.1-1 (scenic vistas), Impact 4.1-2 (county scenic highways), Impact 4.1-3 (city scenic highways), Impact 4.1-6 (pulling/stringing locations), Impact 4.1-8 (visual character or quality of the site), and Impact 4.1-9 (light and glare). Impacts were determined to range from less than significant, to less than significant with mitigation, to significant and unavoidable (see Draft EIR pages 4.1-45 to 4.1-62).

The commenter further states that Section 4.10, Land Use and Planning, of the Draft EIR does not adequately address impacts on the Tierra Rejada Greenbelt. The Tierra Rejada Greenbelt Agreement and SOAR Ordinance are described on Draft EIR page 4.10-5, and impacts to the regulations are adequately analyzed under significance criteria b), page 4.10-14. As discussed in the analysis, "No local land use plans, policies or regulations would apply to the Proposed Project because, pursuant to General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the Proposed Project. Consequently, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (No Impact)... [Regardless, t]he Proposed Project would not conflict with the Tierra Rejada Greenbelt Agreement or Soar Ordinance because it would be located within an established utility corridor, and would not change any Ventura County General Plan land use designation, goal, or policy." Although the Proposed Project would be exempt from the Tierra Rejada Greenbelt Agreement and SOAR Ordinance, the Draft EIR includes a comprehensive analysis of visual impacts to lands and vistas within the Greenbelt, in Draft EIR Section 4.1, Aesthetics, as discussed earlier in this response.

A5-6 The comment expresses support for System Alternative B, and requests that, should this alternative prove to be infeasible, that the alternatives analysis be revised and recirculated to further explore the alternatives that the City of Moorpark had originally requested, or that a new feasible alternative that avoids or greatly reduces visual impacts on Moorpark Residents be included in the alternatives analysis.

> Subsequent to information received from SCE regarding the feasibility of System Alternative B, this alternative has been eliminated as an alternatives candidate. See

Master Response 1, Alternatives in Section 3.1.1 for information about the elimination of System Alternative B. The Draft EIR will not be recirculated because, even with the elimination of System Alternative B, it evaluates a reasonable range of alternatives that have the potential for avoiding or minimizing the impacts of the Proposed Project. The Draft EIR identified System Alternative B as the Environmentally Superior Alternative and therefore the Final EIR identifies a new Environmentally Superior Alternative. As is discussed in Chapter 5 of the Draft EIR and Master Response 1, Alternatives in Section 3.1.1, no single alternative would provide an Environmentally Superior Alternative to both the proposed substation site and subtransmission alignment environmental impacts. Therefore, a combination of alternatives from the Draft EIR would comprise the Environmentally Superior Alternative. The combination of Alternative Substation Site B with Alternative Subtransmission Alignment 3 is identified as the Environmentally Superior Alternative in the Final EIR. The commenter is referred to Response A5-1 for a discussion of the adequacy of the alternatives screened for full evaluation in the EIR, and a discussion of alternatives evaluated in the Draft EIR that would minimize impacts to views from the City of Moorpark.

A5-7 The commenter identified an error in the text. This sentence has been deleted and Draft EIR page ES-6 is modified as follows:

On Tuesday, March 3, 2009 following the educational workshop

A5-8 The commenter provides previous correspondence on the Proposed Project, including its September 24, 2010 letter regarding the scope of the EIR; a related March 17, 2009 email regarding the notice of preparation of the Draft EIR; and a December 22, 2009 letter from the Mayors of Moorpark, Simi Valley, and Thousand Oaks.

A copy of the September 24, 2010 letter was included in Appendix G of the Presidential Substation Project Supplemental Scoping Report (November 2010). Comments contained in the City of Moorpark letter were summarized in Chapter 4 of the Supplemental Scoping Report, and were considered during development of the Draft EIR. The commenter is also referred to Responses A5-1 and A5-4.

The comments raised in the March 17, 2009 email were addressed in the Draft EIR in Section 4.1, *Aesthetics*.

The comments raised in the December 22, 2009 letter were addressed in the Draft EIR: see Chapter 3, *Alternatives and Cumulative Projects*; and Section 4.1, *Aesthetics.* The commenter is also referred to Responses A5-1, A5-4, and A5-5.

Comment Letter A6

EDMUND G. BROWN, JR., Governor

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK 5750 RAMIREZ CANYON ROAD MALIBU, CALIFORNIA 90265 PHONE (310) 589-3200 FAX (310) 589-3207 WWW.SMMC.CA.GOV



October 26, 2011

Ms. Juralynne Mosley Presidential Substation Project c/o Environmental Science Associates 1425 North McDowell Blvd, Suite 105 Petaluma, California 94954

Presidential Substation Project (CPUC A.08-12-023) Draft Environmental Impact Report Comments SCH No.2009021059

Dear Ms. Mosley:

The Santa Monica Mountains Conservancy (Conservancy) is the principle State planning agency in the project area. The Tierra Rejada Valley, and in particular the concerned portion of the valley, is a regionally significant habitat linkage area that cannot withstand many more deleterious impacts--such as the proposed project.

The Draft Environmental Impact Report (DEIR) concludes that Alternative System B is the Environmentally Superior Alternative and the only project alternative without significant environmental impacts. The DEIR provides feeble justification for this demonstrably more damaging and expensive proposed project. The data used to project future electrical demand appears speculative and with a potentially growth-inducing outcome. Likewise the DEIR makes a strong case for less damaging alternatives, other than the project, as being more than adequate to meet the project objectives of increased electrical transmission capability and flexibility.

A6-1

The Conservancy joins the considerable opposition to the proposed project including the cities of Thousand Oaks, Moorpark and Simi Valley, and urges the CPUC only to move forward with Alternative System B. With civic and citizen opposition from all sides and a scenic location riddled with designated Critical Habitat for rare species, the blunt approach of the proposed project does not work with the area's constraints. Better subroute selection as recommended by the City of Moorpark is the solution. Without better analysis of the project impacts on specific subsections of the wildlife corridor and area viewshed, the DEIR shall remain deficient.

Ms. Juralynne Mosley Presidential Substation Project (A.08-12-023) DEIR Comments October 26, 2011 Page 2

Please direct any questions and future documentation to my attention at the above letterhead address, by phone at (310) 589-3200 ext. 128, or by email at edelman@smmc.ca.gov.

Sincerely,

PAUL EDELMAN Deputy Director Natural Resources and Planning

3.2.6 Letter A6 – Responses to Comments from Santa Monica Mountains Conservancy

- A6-1 Regarding System Alternative B and electrical demand see Master Response 1, *Alternatives* in Section 3.1.1. Regarding potential impacts due to growth inducement, see Response A15-37.
- A6-2 The commenter's opposition to the Proposed Project is noted. Regarding System Alternative B, see Master Response 1, *Alternatives* in Section 3.1.1.
- A6-3 Wildlife movement corridors were discussed in the Draft EIR relative to open space areas in the regional vicinity and potential project impacts to these corridors (see *Wildlife Movement and Corridors*, Draft EIR pages 4.4-6 to 4.4-7 and Impact 4.4-7 on page 4.4-41). The Proposed Project would not result in significant impacts to wildlife movement corridors. Also, the elevated subtransmission lines proposed under all alternatives would not pose a barrier to regional wildlife movement. The Draft EIR adequately considers regional wildlife corridors and potential impacts to these resources.

Regarding visual impacts resulting from the Proposed Project, the commenter is referred to Draft EIR Section 4.1, *Aesthetics*.

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Memorandum

TO: Laura Hocking/Dawnyelle Addison, Planning

- DATE: October 24, 2011
- FROM: Alicia Stratton
- SUBJECT: Request for Review of Draft Environmental Impact Report (DEIR) for the Presidential Substation Project, A.08-12-023, Southern California Edison, California Public Utilities Commission (Reference No. 08-058-3)

Air Pollution Control District staff has reviewed DEIR for the project, which consists of construction, operation and maintenance of the Presidential Substation Project. The project, designed to meet forecasted electrical demands in the Cities of Simi Valley and Thousand Oaks, as well as adjacent areas of unincorporated Ventura County, entails construction of a new 66/16 kV distribution substation on a four-acre site, replacement of existing 16 kV distribution and subtransmission poles with new subtransmission poles and installation of 66 kV subtransmission facilities for the portion of the route crossing Highway 23, construction or relocation of related 16 kV distribution components, including four new 16 kV distribution getaways at the proposed Presidential Substation, and relocation, transfer, or upgrade of existing 16 kV distribution facilities either to new subtransmission poles or two new underground 16 kV distribution facilities. Upgrades to new 16 kV distribution would involve installation of new conductors instead of rehanging or burying the existing 16 kV conductors, and construction of facilities to connect the proposed Presidential Substation to SCE's existing telecommentations system. The project objectives are to meet long-term electrical demand and improve electrical system operational flexibility and reliability in a cost-effective manner. The subtransmission line route is 3-1/2 miles long, beginning near the intersection of Read Road and Moorpark Road. It would proceed east to Read Road and Sunset Valley Road. A second subtransmission line would begin near the intersection of Tierra Rejada Road and Sunset Valley Road.

Section 4.3 of the DEIR addresses air quality issues. We concur with the findings of this discussion that significant air quality impacts would not result from the project. Long-term operational impacts would be less than the 25 lbs/day thresholds for ROC and NOx. Short-term, construction related impacts however would exceed APCD's thresholds of significance for those pollutants. However, because they are considered temporary in nature, these construction emissions are not counted toward project impact significance.

A7-1

Section 4.3.3, *Applicant Proposed Measures*, and Section 4.3.4, *Impacts and Mitigation Measures*, address these potential temporary air impacts from the project. These discussions indicate that during the 13-20 month construction phase many steps would be taken to reduce potential air emissions during project construction. These include APM AIR-01, Mitigation Measures 4.3-1 through 4.3-7. Implementation and adherence to these measures will reduce exposure to excessive fugitive dust and ozone precursor emissions. No further air quality mitigation is needed.

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

3.2.7 Letter A7 – Responses to Comments from Ventura County Air Pollution Control District

- A7-1 The commenter expresses concurrence with the Draft EIR findings related to longterm operational impacts, however, appears to disagree with the Draft EIR findings related to short-term construction impacts, and indicates that construction emissions should not be compared to the VCAPCD's ROC and NOx emissions significance thresholds because they are short-term in nature. Although the Ventura County Air Ouality Assessment Guidelines recommend that construction-related ROC and NO_x emissions not be counted towards the two significance thresholds because those emissions are temporary, the guidelines also indicate that construction-related emissions should be mitigated if estimates of ROC and/or NOx emissions from construction activities exceed the 25 pounds per day threshold. In addition, the VCAPCD provided a comment letter on the Draft EIR for the Simi Valley Landfill and Recycling Center Expansion Project that suggests that the VCAPCD considers mitigated ROC and NOx emissions that are in excess of the 25 pounds per day to be substantial and that such emissions should not be considered less than significant. Therefore, as the Lead Agency for the review of the project, the CPUC has conservatively elected to use the VCAPCD significance thresholds to assess the significance of short-term construction equipment exhaust emissions. The associated NOx emissions were found to be significant and unavoidable. Table 4.3-3 on Draft EIR Page 4.3-12 has been updated pursuant to this and other comments received on the Draft EIR. See Final EIR Chapter 4 for edits to page 4.3-12.
- A7-2 The commenter states that implementation and adherence to APM AIR-01 and Mitigation Measures 4.3-1 through 4.3-7 will reduce exposure to excessive fugitive dust and ozone precursor emissions and no further air quality mitigation is needed. Comment noted.

Comment Letter A8

MEMBERS OF THE BOARD LINDA PARKS Chair STEVE BENNETT KATHY I. LONG PETER C. FOY JOHN C. ZARAGOZA

LINDA PARKS

SUPERVISOR, SECOND DISTRICT (805) 214-2510 FAX: (805) 480-0585 E-mail: Linda.Parks@ventura.org

October 31, 2011

Ms. Juralynne Mosley Presidential Substaion Project c/o Environmental Science Associates 1425 North McDowell Boulevard, Suite 200 Petaluma, CA 94954 Email: presidentialsub@esassoc.com

Re: Presidential Substation Project (CPUC A.08-12-023) Draft EIR

Dear Ms. Mosley:

Thank you for the opportunity to comment on the Presidential Substation Draft EIR. The Draft EIR did not adequately address the impacts to the Tierra Rejada Valley. In particular, visual impacts to the Tierra Rejada Greenbelt were not adequately discussed. The proposed power lines would have a significant aesthetic impact, and there was a lack of discussion on avoiding or] mitigating this impact.

A superior alternative that would avoid aesthetic impacts and preserve the rural character of the Tierra Rejada Greenbelt would put the power lines underground or avoid the intrusion by upgrading existing substations. I respectfully urge you to include the alternative to underground the power lines in your analysis and to more comprehensively explore the option of upgrading existing substations.

Sincerely,

inda Parks Supervisor, 2nd District





SUPERVISORS **BOARD OF** COUNTY OF VENTURA 625 WEST HILLCREST DRIVE, THOUSAND OAKS, CA 91360

A8-1

A8-2

3.2.8 Letter A8 – Responses to Comments from Ventura County Board of Supervisors

- A8-1 Regarding impacts to the Tierra Rejada Greenbelt, the commenter is referred to Response A5-5.
- A8-2 See Master Response 1, *Alternatives* and Master Response 3, *Undergrounding* in Section 3.1.



PUBLIC WORKS AGENCY TRANSPORTATION DEPARTMENT Traffic, Advance Planning & Permits Division

MEMORANDUM

DATE: October 18, 2011

TO: PWA - Planning Division Attention: Laura Hocking

Ben Emami, Engineering Manager II FROM:

SUBJECT: REVIEW OF DOCUMENT 08-058 Draft Environmental Impact Report (DEIR) Southern California Edision (SCE) Presidential Substation Project Permit to construct, maintain, and operate electrical facility in the City of Thousand Oaks and unincorporated Ventura County. (city) Lead Agency: California Public Utilities Commission (CPUC)

Pursuant to your request, the Public Works Agency -- Transportation Department has reviewed the DEIR for the Presidential Substation Project (Project) with potential impacts to roads in the City of Moorpark, City of Simi Valley, City of Thousand Oaks, and unincorporated Ventura County.

The purpose of the Project is to meet the forecasted electrical demands in the cities of Simi Valley and Thousand Oaks, as well as adjacent areas of Ventura County (Electrical Needs) Area [ENA]). The ENA is presently served by three of the 66/16 kilovolt (kV) distribution substations that are fed by the Moorpark 66 kV System. These three distribution substations (Thousand Oaks Substation, Potrero Substation, and Royal Substation) provide electrical service to approximately 60,000 metered customers and are presently at or near their operating capacity. The Project involves the construction of a new 66/16 kV distribution substation (proposed Presidential Substation in the City of Thousand Oaks) and associated 66 kV subtransmission lines (proposed subtransmission alignments), telecommunications connection, and related distribution components.

The Project includes the following major components:

- 1) Construction of a new 66/16 kV low-profile distribution substation (proposed Presidential Substation) on an approximate four-acre site located south of the intersection of Read Road (county) and Olsen/Madera Road (Thousand Oaks);
- 2) Removal of approximately 89 16 kV distribution poles and 4 66 kV subtransmission poles;
- 3) Replacement of approximately 66 steel subtransmission poles with polymer insulators;
- Installation of the 66kV conductor subtransmission lines under State Route 23 (Caltrans);

- Installation of 2.3 miles of 66kV conductor subtransmission lines under Read Road (county, private) and 1.0 miles under Sunset Valley Road (county);
- Construction of new access roads for construction and maintenance of the underground facilities; and
- Appurtenant work under said roads, including Tierra Rejada Road (county, Thousand Oaks, Simi Valley), Moorpark Road (county, Thousand Oaks), and Esperance Road (private).

The Project ("Phase I") and Subtransmission Alignment ("Phase II") Construction work will take up to 20 months to complete. Construction will be performed by approximately 42 employees. Grading for the Substation will take approximately 5,440 truck loads to bring 40,000 CY of fill from as close as the City of Fillmore (20 miles) to as far as Inglewood (60 miles) or Monrovia (70 miles) over 90 days. Existing substations in Thousand Oaks, Moorpark, or Santa Clarita are proposed as staging areas for construction or a 3-acre commercial facility about 5 miles from the Substation. The number of employees required to maintain the facilities is unknown at this time.

Our comments are as follows:

- 1. We generally concur with the draft transportation Mitigation Measures on Pages ES-37 to ES-39 of the DEIR repeated here below:
 - a. 4.15-1a: SCE shall obtain and comply with local road encroachment permits for public roads that are crossed by the proposed subtransmission alignment. SCE shall also coordinate short-term construction activities at private road crossings with the applicable private property owners. Copies of all encroachment permits and evidence of private property coordination shall be provided to the CPUC prior to the commencement of construction activities.

A9-1

- b. 4.15-1b: SCE shall prepare and implement a Traffic Management Plan (Plan) subject to approval of the appropriate state agency and/or local government(s). The approved Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. The Plan shall:
 - i) Include a discussion of work hours, haul routes, work area delineation, traffic control and flagging;
 - ii) Identify all access and parking restriction and signage requirements;
 - iii) Require workers to park personal vehicles at the approved staging area and take only necessary Project vehicles to the work sites;
 - iv) Lay out plans for notifications and a process for communication with affected residents and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which road/lanes and access point/driveways would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or V complaints; and

- v) Include plans to coordinate all construction activities with emergency service providers in the area prior to construction to ensure that construction activities and associated lane closures would not significantly affect emergency response vehicles. Emergency service providers shall be notified of the timing, location, and duration of construction activities. All roads shall remain passable to emergency service vehicles at all times. SCE shall submit verification of its consultation with emergency service providers to the CPUC. Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow.
- c. 4.15-1c: The County and SCE shall insure that appropriate warning signs are posted alerting bicyclists to bike lane closures and instructing motorists to share the road with bicyclists. In addition, in order to remove potential roadway hazards to bicyclist in the construction areas the SCE shall ensure that all contract haul trucks are covered to prevent spillage of materials onto haul routes, and that the area adjacent to the Substation site shall be kept free of debris and dirt that may accumulate from entering and exiting trucks by conducting regular sweeping of the Project area.
- d. 4.15-1d: SCE shall coordinate with the appropriate local government departments in Thousand Oaks, Simi Valley, with county agencies such as the Ventura County Public Works Agency, with state agencies such as Caltrans, and with other utility districts and agencies as appropriate, regarding the timing of construction projects that would occur near the proposed Project. The Ventura County Public Works Agency reviews environmental documents to ensure that all individual and cumulative adverse impacts to the Regional Road Network and County-maintained local roads have been adequately evaluated and mitigated to insignificant levels. SCE shall submit verification of its coordination to the CPUC. This multiagency coordination, and implementation of Mitigation Measures 4.15-1a and 4.15-1b, would ensure that the cumulative effect of simultaneous construction activities in overlapping areas would be minimized.
- e. 4.15-3a: Implement Mitigation Measure 4.15-1a/b/c:
- f. 4.15-3b: Roads damaged by construction would be repaired to a structural condition equal to that which existed prior to construction activity. The Project partners and the local jurisdiction shall enter into an agreement prior to construction that will detail the pre-construction conditions and the postconstruction requirements of the rehabilitation program.
- 2. We would add the following comments with regard to the Mitigation Measures:
 - a. An Encroachment Permit is required for any work within the right-of-way of a County road. The County roads affected by the Project are Read Road from Sunset Valley Road to Moorpark Road, Sunset Valley Road from Read Road to Tierra Rejada Road, Tierra Rejada Road from State Route 23 to Llevarancho Road (private), and the county portion of Moorpark Road. Esperance Road is a private road. The Project proponent shall contact (805)

A9-2

A9-1

654-2055 for the requirements of this permit.

- b. The Plan or Traffic Control Plan shall be submitted to the County of Ventura Transportation Department for review and approval. The Plan shall be prepared by a traffic engineer, submitted, reviewed, and approved for any road closure, partial road closure, or detours on County Roads. The Plan must be approved a minimum of seven calendar days prior to the actual closure or detour.
- c. With regard to Mitigation Measure 4.15-3b, according to County policy, trenching shall not be permitted on any street that was rehabilitated within the last five years, unless a full width overlay is provided after trenching is completed. This policy applies to Read Road and Sunset Valley Road; therefore full width paving is required on these roads after construction is completed. The Project proponent shall contact the Encroachment Permits Division for more information.
- d. Proper precautions shall be taken to protect all road facilities. If, in the opinion of the Transportation Department, any portion of a County road or road facility is damaged by the Project's operations, then it shall be replaced in accordance with current standard construction details and/or in a manner acceptable to the Transportation Department Director and/or his designee.
- According to the DEIR on Page 4.15-10 dated September 2011, (1) construction will require up to 42 employees for up to 20 months, (2) 5,440 truck loads to transport 40,000 cubic yards of fill from as far away as Monrovia (70 miles) over a 90 day period, and (3) an unknown number of employees to maintain and operate the new facility and subtransmission/distribution system.

The cumulative impacts of this development/construction, when considered with the cumulative impact of all other approved (or anticipated) development projects in the County, will be potentially significant. To address the cumulative adverse impacts of traffic on the County Regional Road Network, the appropriate Traffic Impact Mitigation Fee should be paid to the County when the development/construction occurs. The fee due to the County should be determined by the City of Thousand Oaks and paid to the County of Ventura in accordance with the reciprocal agreement between the City of Thousand Oaks and the County of Ventura.

Our review is limited to the impacts this Project may have on the County's Regional Road Network.

Please contact me at 654-2087 if you have questions.

ec: Jeff Pratt, Public Works Agency Director

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A9-3

A9-2

3.2.9 Letter A9 – Ventura County Public Works Agency

- A9-1 The commenter concurs with the mitigation measures pertaining to transportation and traffic (Mitigation Measures 4.1-15a through 4.15-d and Mitigation Measures 4.15-3a and 4.15-3b). This comment is noted.
- A9-2 This comment details necessary permits, plans and polices regarding implementation of Mitigation Measures 4.15-1a, 4.15-1b, and 4.15-3b. Those details do not affect the accuracy or adequacy of the Draft EIR. This comment is noted.
- A9-3 Traffic impact mitigation fees apply to development of land uses that generate traffic on an on-going (permanent) basis, not construction-related (temporary) traffic, and therefore those fees are not applicable to the Proposed Project. The commenter mischaracterizes traffic generated by operation and maintenance of the project facilities. As stated on page 2-56 of the Draft EIR, the proposed Presidential Substation would be unstaffed, and as stated on page 4.15-12 of the Draft EIR, once constructed, the proposed subtransmission alignments and the proposed Presidential Substation would require routine maintenance trips, inspection, and vegetation management activities. Maintenance activities would not increase above existing levels that are employed to maintain the existing subtransmission line ROWs and therefore, project operations would not result in a substantial increase in traffic in the study area.

County of Ventura Planning Division MEMORANDUM

DATE: September 26, 2011

- TO: Laura Hocking, RMA/Planning Technician Ventura County Planning Division
- FROM: Andrea Ozdy Land Conservation Act (Williamson Act) Planner
- SUBJECT: Environmental Document Review for Non-County Project No. RMA 08-053-03 – California Public Utilities Commission (CPUC) Presidential Substation Project, Moorpark

I have reviewed the Draft Environmental Impact Report (DEIR) for the CPUC Presidential Substation Project, as it relates to the Land Conservation Act (LCA).

The transmission lines proposed as part of this project run along several properties that are subject to LCA contracts 76-1.7, 76-1.11, 76-1.8 (Assessor's Parcel Numbers 500-0-410-26, -36, -01, respectively) along Sunset Valley Road in Moorpark. As the transmission lines will be installed within the roadway, no removal of commercial agriculture within adjacent properties is expected to occur. Therefore, the project would result in a less than significant impact with respect to the LCA and the existing LCA contracts.

If you have any questions or comments, please contact me at andrea.ozdy@ventura.org or (805) 654-2453. Thank you.

A10-1

3.2.10 Letter A10 – Responses to Comments from Ventura County Planning Division

A10-1 The comment provides information pertaining to the Land Conservation Act (LCA). The commenter also concurs with the Draft EIR conclusions that the Proposed Project would have a less than significant impact on LCA (Williamson Act) contracts. The information provided by the commenter is consistent with the environmental setting and analysis in Draft EIR Section 4.2, *Agriculture and Forestry Resources*.


County of Ventura Public Works Agency Integrated Waste Management Division MEMORANDUM

Date: September 30, 2011

- To:Laura Hocking, PlannerResource Management Agency, Planning Division
- From: Derrick Wilson, Staff Services Manager Integrated Waste Management Division
- Subject: Draft Environmental Impact Report Presidential Substation Project RMA Reference No: 08-058-3
- Lead Agcy: California Public Utilities Commission Contact: Juralynne Mosley, 415/962-8409

Summary: The California Public Utilities Commission has prepared a Draft Environmental Impact Report for consideration of Southern California Edison's application to construct, operate, and maintain the Presidential Substation Project, to be located in the City of Thousand Oaks and unincorporated Ventura County. The project includes:

- 1. Construction of a new 66/16kV distribution substation on a 4 acre site.
- 2. Replacement of existing 16kV distribution and subtransmission poles with new subtransmission poles, and the installation of 66kV subtransmission conductors.
- 3. Installation of underground 66kV subtransmission facilities for the portion of the route crossing Highway 23.
- Construction and/or relocation of related 16kV distribution components, including four new 16kV distribution getaways located at the proposed Presidential Substation.
- 5. Relocation, transfer, or upgrade of distribution facilities.
- 6. Construction of facilities to connect the proposed Presidential Substation to Southern California Edison's existing telecomcommunications system.

Comments:

Pursuant to your request, the Integrated Waste Management Division (IWMD) has reviewed the project materials provided with your September 21, 2011, memo and appreciates the opportunity to provide our comments.

The IWMD requests the Lead Agency for this project to comply, to the extent feasible, with the general requirements of Ventura County Ordinances #4308 (solid waste handling,

disposal, waste reduction, and waste diversion) and #4421 (requirements for the diversion of A construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to meet the requirements of Assembly Bill 939 (AB 939). AB 939 mandates all cities and counties in California to divert a minimum of 50% of their jurisdiction's solid waste from landfill disposal. Ordinances 4308 and 4421 may be reviewed in their entirety at www.wasteless.org/ord4308 and www.wasteless.org/ord4421.

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

Recyclable Construction Materials

Contract specifications for this project shall include a requirement that recyclable construction materials (e.g., metal, concrete, asphalt, rebar, wood) generated during the Ventura County phase of the project be recycled at a permitted recycling facility. For a comprehensive list of permitted recyclers, haulers, and solid waste & recycling facilities in Ventura County, see:

www.wasteless.org/construction&demolitionrecyclingresources.

Soil - Recycling & Reuse

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

www.wasteless.org/construction&demolitionrecyclingresources.

Green Materials - Recycling & Reuse

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

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

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

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

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

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

Ec: Larry Cardozo, PWA Development and Inspection Services

3.2.11 Letter A11 – Responses to Comments from Ventura County Integrated Waste Management Division

A11-1 The comment provides information updating the Regulatory Context Section. In response to this comment, Draft EIR page 4.16-6 is modified as follows:

The Tulare Ventura County Recycling and Conversion of Construction and Demolition Debris Ordinance Ordinances (Ordinance Numbers 4421 and 43084357), adopted in 2007 2010 and 2004, establishes regulations for the recycling and diversion of Construction and Demolition (C&D) Debris within unincorporated areas in Ventura County. Both ordinances assist the County in its efforts to meet the requirements of AB 939. According to the ordinances, applicants for a Covered Project⁴ must complete and submit a C&D Debris Recycling Plan as a prerequisite for Permit issuance. The C&D Recycling Plan must be reapproved by the C&D Recycling Compliance Official, and prior to completion of the project the Applicant must submit a C&D Debris Recycling Report showing compliance with the Plan. According to the ordinance, the applicant must divert a minimum of 60 percent of the C&D debris resulting from the project (County of Ventura, 20072010). The applicant must fill out a summary table at the completion of the project, and submit it to the Ventura County Integrated Waste Management Division at the conclusion of project work. The summary table must include the contractor's name, address, and phone number, the project's name, the types of recyclable materials generated during the project (e.g., metal, concrete, asphalt, rebar, wood, soil, greenwaste) and the approximate weight of recyclable materials. Receipts and/or documentation are required for each entry in the summary table to verify recycling and/or reuse occurred, and that recyclable greenwaste, wood, soil, and sediment generated by this project was not landfilled.

A11-2 The commenter provides contract specifications regarding recycling construction materials. Draft EIR page 4.16-12 is modified as follows:

Waste resulting from the construction of the proposed Presidential Substation and the removal of the wood poles that would be included under the Ventura County C&D Debris Ordinance would be required to meet a 60 percent diversion requirement. <u>The C&D Debris Recycling Plan</u> submitted by the applicant would include specifications ensuring that the

⁴ "Covered Project" includes any project meeting one or more of the following thresholds: (1) Residential additions or remodels of 1,000 square feet or more of gross floor area; (2) Commercial or Industrial tenant improvements of 2,000 square feet or more of gross floor area; (3) New structures irrespective of gross floor area or valuation; (4) Demolition of any structure subject to a building permit, irrespective of cost or valuation; (5) Any grading work requiring a Permit, irrespective of cost, from which inert material will be removed from the project site; (6) All construction projects awarded within the County pursuant to procurement policy and the competitive bid process mandated by the California Public Contract Code (Ventura County, 2007).

<u>Proposed Project meets all Ventura County solid waste requirements,</u> <u>including details on construction material recycling, soil reuse and recycling,</u> <u>and green waste.</u> Also, because the local landfills would have sufficient capacity to accept the remainder of SCE's construction waste (i.e., a combined remaining capacity of 42.6 million cubic yards of waste), this would be a less-than-significant impact.

- A11-3 The commenter provides specifications regarding soil recycling and reuse. Language has been added to the impact analysis addressing this comment on page 4.16-12. See Response A11-2 above.
- A11-4 The commenter provides specifications regarding green materials recycling and reuse. Language has been added to the impact analysis addressing this comment on page 4.16-12. See Response A11-2 above.
- A11-5 The commenter added specifications regarding the submission of a final summary table. Language has been added to the impact analysis addressing this comment on page 4.16-12. See Response A11-1 above.



VENTURA COUNTY WATERSHED PROTECTION DISTRICT

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

MEMORANDUM

- DATE: October 28, 2011
- TO: Laura Hocking, RMA/Planning Technician Resource Management Agency, Planning Division
- FROM: Tom Wolfington, P.E., Permit Manager
- SUBJECT: RMA 08-058-3 –California Public Utilities Commission Draft Environmental Impact Report SCH #: 2009021059 Presidential Substation Project Arroyo Santa Rosa, Zone 3

Pursuant to your request, this office has reviewed the subject Draft Environmental Impact Report (DEIR) dated September 2011 for California Public Utilities Commission Case CPUC A.08-12-023.

PROJECT LOCATION

The Proposed Project is located in the City of Thousand Oaks and unincorporated Ventura County, California. The proposed Presidential Substation would be located in the northeastern portion of the City of Thousand Oaks near the jurisdictional boundary of the City of Simi Valley. The proposed subtransmission alignment traverses directly west from the proposed Presidential Substation across open space, agricultural and residential areas along Read Road to connect with the Moorpark-Thousand Oaks No. 2 subtransmission line near the intersection of Read Road and Moorpark Road. The proposed subtransmission alignment connecting with the Moorpark-Royal No. 2 subtransmission line would follow the same alignment due west from the proposed Presidential Substation until it turns roughly north adjacent to Sunset Valley Road. The proposed subtransmission alignment would then proceed north along the west side of Sunset Valley Road near residential and agricultural land uses and connect to the existing subtransmission line at the corner of Sunset Valley Road and Tierra Rejada Road. According to the location map provided, the alignment of the proposed project includes a segment originating at Moorpark Road and Read Road and proceeding east along Read Road and its projection to Madera Road, and a segment originating at the intersection of Read Road with Sunset Valley Road and proceeding northerly along Sunset Valley Road to Tierra Rejada Road.

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PROJECT DESCRIPTION

The Proposed Project includes construction, operation and maintenance of the following components, depicted in Figure 2-3 of the DEIR:

- Construction of a new 66/16 kV distribution substation (proposed Presidential Substation) on an approximately 4-acre site;
- Replacement of existing 16 kV distribution and subtransmission poles with new subtransmission poles and installation of 66 kV subtransmission conductor to supply the proposed Presidential Substation;
- Installation of underground 66 kV subtransmission facilities for the portion of the route crossing Highway 23 (Hwy 23);
- Construction or relocation of related 16 kV distribution components, including four new 16 kV distribution getaways at the proposed Presidential Substation, and relocation, transfer, or upgrade of existing 16 kV distribution facilities either to new subtransmission poles or to new underground 16 kV distribution facilities. Upgrades to new 16 kV distribution would involve installation of new conductors instead of re-hanging or burying the existing 16 kV conductor; and
- Construction of facilities to connect the proposed Presidential Substation to SCE's existing telecommunications system.

The proposed subtransmission alignment would be constructed in a combination of existing and new ROW.

WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:

According to the location map, one of the project routes will cross Arroyo Santa Rosa, a District jurisdictional red line channel, at Sunset Valley Road. This crossing will require a watercourse permit from the District prior to construction.

Any activity in, on, over, under or across any jurisdictional red line channel will require a permit from the District. In addition, a project can not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional red line channel

References to District ordinances (DEIR page 4.9-16) should be updated to include Ordinance WP-1 adopted January 12, 2010.

END OF TEXT

A12-1

3.2.12 Letter A12 – Responses to Comments from Ventura County Watershed Protection District

A12-1 The Draft EIR has been modified to incorporate the commenter's point regarding the VCWPD's jurisdictional channels and required permits.

The following row has been added to bottom of Draft EIR Table 2-10 (page 2-57):

Watercourse Permit	VCWPD	Construction or placement of any structure
		in, upon or across a watercourse.

Draft EIR pages 4.9-16 and 4.9-17 are modified as follows:

The authority of the VCWPD over its jurisdictionjurisdictional channels is established through a number of ordinances and policies. The primary ordinance established establishing the VCWPD's authority and requirements related to obtain permits for encroachments in jurisdictional waters and right of ways is Ventura County Ordinance FC-18No. WP-1 (which has been consolidated from earlier ordinances focused on flood control and watershed protection) (VCWPD, 2010). Ordinance FC-18 relates to protection and regulation of flood control facilities and watercourses. This ordinance has been amended by FC-19 through FC-23 and FC-27 (VCWPD, 1981). The ordinance prohibits the construction or placement of any structure in, upon or across a watercourse without a permit. The Proposed Project and Alternative Subtransmission Alignment 3 would cross Arroyo Santa Rosa, a VCWPD jurisdictional channel, and would subsequently require a watercourse permit from the District. In either instance, SCE would contact and acquire the necessary permits from the VCWPD. Additionally, the VCWPD implements the Flood Plain Management Ordinance 3841 on behalf of the County of Ventura to ensure compliance with FEMA regulations. This includes all proposed residential and non residential development within the 1 percent annual chance base flood area (100-year floodplain).

Draft EIR page 4.9-30 is modified as follows:

Ventura County Watershed Protection District (VCWPD), Ventura County Flood Control District 2010. Watershed Protection Ordinance No. FC-18, amended by FC-19 through FC-23 and FC-27, 1981<u>WP-1</u>, enacted January 12, 2010, available at http://portal.countyofventura.org/portal/ page/portal/PUBLIC_WORKS/Watershed_Protection_District.

From:	Lauren Funaiole [LFUNAIOL@simivalley.org]	
Sent:	Monday, November 14, 2011 10:17 AM	
To:	Presidential Substation Project	
Subject:	COMMENTS ON THE DRAFT EIR	
Follow Up Flag:	Follow up	
Flag Status:	Completed	
Categories:	Green Category, Blue Category	

Hello,

I am an environmental planner for the City of Simi Valley. The Simi Valley City Council has requested that I find out if other agencies or environmental groups have expressed support for approval of System Alternative B. I would really appreciate it if you could provide me with a list of those commenters.

Please feel free to call with any questions.

Thank you,

3.2.13 Letter A13 – Responses to Comments from City of Simi Valley

A13-1 All comments received on the Draft EIR are provided in this Final EIR. Numerous agencies and environmental groups submitted comments expressing support for System Alternative B. This alternative was eliminated from the Final EIR because based on further review and evaluation, it was determined to be infeasible. See Master Response 1, *Alternatives* in Section 3.1.1 for information pertaining to this issue.



City of Thousand Oaks

COMMUNITY DEVELOPMENT DEPARTMENT JOHN C. PRESCOTT, DIRECTOR

Building Division Planning Division Housing/Redevelopment Div.

(805) 449-2500 (805) 449-2323 (805) 449-2393

November 15, 2011

Ms. Juralynne Mosley Presidential Substation Project c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, CA 94954

RE: Draft EIR for Presidential Substation, September 2011 (CPUC A.08-12-023; SCH #: 2009021059)

Dear Ms. Mosley:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Presidential Substation. Of the alternatives identified in the DEIR, the City offers the following initial comments:

- "System Alternative B": This alternative, which proposes upgrades at three existing substations in lieu of constructing the Presidential Substation, warrants further investigation. The DEIR states that this alternative "meets all legal, regulatory, and technical feasibility criteria" (Page ES-13), and identifies it as the environmentally superior alternative. The City would, however, appreciate additional information regarding this option, particularly with regard to noise mitigation and effect on system reliability.
- 2. "Alternative Subtransmission Alignment 4": The City recommends inclusion of this alternative as one of the final options for consideration by the CPUC. This alternative proposes full undergrounding of the subtransmission lines, and is consistent with the joint recommendation of the cities of Moorpark, Simi Valley, and Thousand Oaks that all lines be located underground, and could enhance system reliability. The City believes that this alternative should not have been screened from further analysis in the DEIR and should be fully evaluated in the Final EIR. If full undergrounding of the lines is not approved, then the City supports "Alternative Subtransmission Alignment 3", which proposes partial undergrounding of the subtransmission lines, from the intersection of Sunset Valley Road/Read Road to the proposed substation.
- "System Alternative A": This option would upgrade two of the substations using standard-sized equipment, but was screened from further consideration in the DEIR because it would not meet demand estimates. The City recommends that

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A14-8

Presidential Substation Draft EIR Comment Letter November 15, 2011 Page 2

demand estimates be updated and substantiated in order to confirm that demand A14-3 is still expected to exceed the additional capacity provided by this option.

Following are specific comments on the DEIR, and requests for additional information:

 "<u>System Alternative B</u>": This alternative proposes replacing existing transformers at the three substations in the Electrical Needs Area with larger transformers (25-30 mega-volt ampere (MVA) range), in lieu of constructing the proposed Presidential Substation. The three substations include the Royal substation in Simi Valley, as well as the Potrero and Thousand Oaks substations in Thousand Oaks. The Thousand Oaks substation abuts residential property on three sides and the Potrero substation abuts industrial park uses. This alternative is identified in the Draft EIR as the "environmentally superior alternative."

The City is interested in this alternative, as long as it does not adversely affect adjacent properties or system reliability. The City would therefore appreciate additional information regarding this alternative, as described below. This information is needed to more thoroughly assess any site-specific impacts that may result.

- a) The DEIR states that the existing transformers are 16.8 MVA on page 3-24, and 22.4 MVA on page 3-36. Please address this discrepancy.
- b) Please provide the dimensions of 25-30 MVA transformers.
- c) The DEIR indicates that capacity would need to be increased to the same degree at all substations. Please advise if one substation could be increased to a greater degree (MVA) than another, in order to minimize potential impacts on adjacent land uses.
- d) The Thousand Oaks and Potrero substations are approximately 3.2 and 1.9 acres in size, respectively. Please identify approximately where larger transformers would be located within these parcels, in order to understand their proximity to adjacent land uses.
- e) The DEIR states that larger transformers would require replacement of some existing 16kV equipment located inside and outside of the substations' footprints, but does not describe this related equipment or where it would be located (Section ES.2.1 on page ES-13). Please provide a description including dimensions and locations of any related poles or equipment that would be required to accommodate the larger transformers.
- f) The DEIR states that the larger transformers would result in increased noise (Section 3.4.5 on page 3-25), but that mitigation measures would reduce impacts from the larger transformers to a less than significant level. Please

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describe the mitigation measures that would be implemented to avoid any significant impacts to adjacent residents. Such mitigation measures are particularly important with regard to the Thousand Oaks substation, which abuts residential property on three sides. This is probably less of an issue for the Potrero Substation, which is located in an industrial area.

- g) The DEIR states that the larger transformers would result in reduced operational flexibility and reliability because the sizes are not consistent with standard SCE substations and therefore it may take longer to repair broken equipment (Section 3.4.5 on page 3-25). This needs to be thoroughly evaluated in the Final EIR, including the comparative effect on system reliability in terms of new, non-standard transformers versus older, standard transformers.
- <u>"Alternative Subtransmission Alignment 4"</u>: This alternative proposes full undergrounding of transmission lines as recommended by the cities of Moorpark, Simi Valley and Thousand Oaks in a joint letter dated December 22, 2009. This alternative would address the cities' aesthetic concerns. In the DEIR, however, it was screened from full evaluation because it was determined that this alternative would not reduce overall environmental impacts (Table 3-2 on page 3-10).

The City believes, however, that the environmental impacts from this option are indeed less than other alternatives and should be considered as a viable alternative in the Final EIR for the following reasons:

- a) The DEIR states that this alternative would result in greater environmental impacts on cultural resources. Such cultural resources, however, are not identified in the DEIR, and mitigation measures are provided in the DEIR to reduce cultural impacts from the proposed project to a less than significant level. Similar mitigation measures could be applied to this alternative; and therefore, cultural resource concerns are not compelling grounds to consider the environmental impacts from this option to be greater than the others.
- b) Undergrounding of overhead subtransmission lines on Read Road west of Sunset Valley Road, and on Sunset Valley Road, would reduce aesthetic impacts more than under Alternative Subtransmission Alignment 3. The replacement lightweight steel poles, for example, would generally be 61' tall, with some potentially up to 75' tall (Figure 2-9a on page 2-21, and Figure 2-9b on page 2-22); and therefore, would be significantly taller than the existing wooden poles which appear to be approximately 30' in height (Figure 4.1-2a on page 4.1-5). The replacement poles would adversely impact the scenic character of this area, which is subject to the Tierra Rejada Valley Greenbelt Agreement. This historic agreement was signed by the County and cities of Moorpark, Simi Valley and Thousand Oaks in 1984 in order to preserve the Tierra Rejada Valley for agricultural and open space uses.

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A14-10

 <u>"System Alternative A"</u>: This alternative, which would increase the capacity of the Potrero and Royal substations using standard 28 MVA transformer sizes, was screened from full consideration because it would purportedly not provide the capacity needs of SCE to meet basic project objectives (Page 3-12).

This alternative should be fully evaluated for the following reasons:

- a) If the existing transformers are actually 16.8 MVA as stated on page 3-24, then this alternative would provide an increase in capacity of approximately 33.6 MVA. This equates to a capacity increase of about 8.4%, or 60% of the additional capacity from the proposed project (56 MVA), based on the current 400 MVA joint capacity of the three substations.
- b) Demand projections in the Proponent's Environmental Assessment (PEA) from 2008 may exceed actual demand, and upgrading the existing substations using standard transformer sizes may therefore be a feasible alternative to meet demand through 2018.

For example, the PEA stated that 2008 demand was 336 MVA for the three substations, and that 2011 normal demand was expected to be 366 MVA (Page 1-2 of PEA). This was based on a projected normal demand increase of about 2.1% per year from 2009-2018. A 1-in-10 year event was estimated to increase demand by about 9.5%.

The portion of Thousand Oaks that is within the Electrical Needs Area (ENA), however, is largely built-out and unlikely to be a significant demand factor in terms of additional population or projects. For example, many of the projects contained in Table 3-3 on page 3-41 of the DEIR are minor in nature and would not result in a significant increase in demand for electricity. Factors such as solar energy projects, Smart Meter installation and the extensive economic downturn could also reduce projected demand.

The Final EIR should therefore update actual demand within the ENA using 2011 data, and adequately document future demand projections, in order to provide a sound basis on which to include, or exclude, this alternative.

The demand projection should substantiate normal and peak demand within the Electrical Needs Area, including consideration of: i) per capita demand trends; ii) existing and future population factors; and iii) future development projects. Without such updated data on current A14-14

A14-15

A14-16

demand, and substantiated future demand, it is not possible to rule out T A14-17 this alternative from final consideration.

- 4. <u>"Stellar Substation Alternative"</u>: It is the City's understanding that SCE has a property interest in land for a substation located east of the intersection of Campus Park Drive and Collins Drive, near the border between the City of Moorpark and Simi Valley. This site is identified as the "Stellar Substation" in Figure 3-1 on page 3-5 of the DEIR, although the property appears to be vacant. Due to the proximity of this location to existing 66kv subtransmission lines and the proposed substation site, the City respectfully requests that this site be evaluated as an alternative in the Final EIR.
- 5. <u>Substation Planting Plan</u>: The proposed planting plan (Table 2-3 on page 2-15) does not adequately screen the proposed substation, as shown in photosimulation G, Figure 4.1-7b on page 4.1-43. Plantings on the north and east side of the facility should be of sufficient size and quantity so as to effectively screen the facility, including the perimeter wall and equipment within the substation, from public view on Olsen Road, which is a City-designated scenic highway. Plantings should be primarily native species, which are drought-tolerant and low-maintenance, such as the evergreen Coast Live Oak (*Quercus agrifolia*; 48" box size recommended), and shrubs such as Toyon (*Heteromeles arbutifolia*), and sugarbush (*Rhus ovata*). The perimeter wall around the facility should be planted with vines to minimize graffiti. The City accepts SCE's offer to review the proposed perimeter wall and planting plan (Pages 2-15 and 4.1-50).
- 6. <u>Substation Lighting Plan</u>: The City requests that a photometric analysis be prepared as part of the proposed lighting plan if the substation is approved at the proposed location, to ensure compliance with Mitigation Measure 4.1-9, and that the City be allowed the opportunity to review and comment on the draft lighting plan. The photometric plan should indicate proposed light levels within the facility and immediately adjacent to the facility to demonstrate minimum lighting levels and sharp light cut-off at the substation boundary.
- <u>Special-Status Plants</u>: On page 4.4-16 of the DEIR, Conejo buckwheat (*Eriogonum crocatum*) and Santa Susana tarplant (*Deinandra (Hemizonia) minthornii*) should be added to the discussion of sensitive-status plants, because they are both listed by the State of California as "Rare."
- 8. <u>Biological Reports</u>: The biological reports referenced in the DEIR, such as the focused Lyon's pentachaeta survey (2009), Lyon's pentachaeta and Riverside Fairy Shrimp Habitat Assessment Surveys (2010), should be included as appendices in the Final EIR and not merely noted in the bibliography. This is particularly important with respect to Lyon's pentachaeta, which was not surveyed for in 2010, and therefore the DEIR relies on the 2009 focused survey for this species. California Department of Fish and Game (CDFG) also requires

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that all plant species be identified, not merely sensitive species. A list of plants observed during the Habitat Assessment Survey should therefore be available for direct review in the document.

- 9. <u>Pre-construction survey for Lyon's pentachaeta (Pentachaeta lyonii)</u>: The DEIR states that the proposed project is located near, but outside of Subunit 1C of the Simi Valley Critical Habitat Unit for this species. The Habitat Assessment Survey for this species that was prepared by Bonterra Consulting (dated July 27, 2010) indicates that the critical habitat boundary is immediately adjacent to the proposed substation site (Exhibit 3). Because Lyon's pentachaeta is an annual plant, the location of its population fluctuates on an annual basis. Preconstruction surveys for Lyon's pentachaeta, therefore need to be undertaken, due to the proximity of critical habitat to the substation site.
- Invasive Plant Plan: In reference to Mitigation Measure 4.4-1 of the DEIR, the Noxious Weed and Invasive Plant Control plan should be reviewed by the California Department of Fish and Game (CDFG), as well as by the Agricultural Commissioner and CPUC.
- Haul Route: The DEIR estimates that site preparation will require 40,000 cubic yards of imported soil, which equates to approximately 5,440 truck trips (page 2-34). The haul route for this imported material should be reviewed and approved by the City's Public Works Department, in order to minimize impacts to City streets and residents along the haul route.
- 12. <u>Tubular Steel Pole Width</u>: Tubular steel poles (TSPs) are proposed at nearly all pole locations between the proposed substation and the intersection of Read Road and Sunset Valley Road. Part of this route is near residential areas (Figures 2-9d,e,f on pages 2-24, 2-25 and 2-26). The Draft EIR states that TSP width could vary from 2 feet to 4 feet in diameter at the base of the pole (Section 2.5.2.2 on page 2-27), but does not identify widths for the poles depicted in exhibits 4.1-4 or 4.1-7a. Therefore, it is not clear if, in fact, the photosimulations depict the maximum potential visual impact of the poles. The photosimulations should depict poles with a 4 foot diameter base, and identify the diameter and height (above-grade) of the associated concrete bases in the narrative of the final EIR.
- 13. <u>Need for Photosimulation of Subtransmission Poles at Olsen Road:</u> None of the photosimulations in the DEIR depicts the visual impact of the four tubular steel poles, ranging from 60' to 70' in height, and related transmission lines that are proposed on each side of Olsen Road near the proposed substation (Figure 2-9f on page 2-26). This additional photosimulation is crucial to understand the aesthetic impact of the subtransmission poles on Olsen Road, which is part of the City's Scenic Highway System and a gateway to Thousand Oaks.

A14-27

A14-24

A14-25

- 14. <u>Need for Photosimulation of Subtransmission Poles on West Side of Highway 23</u>: The Draft EIR includes a photosimulation which shows the proposed substransmission poles located adjacent to the east side of the 23 Freeway (Figure 4.14 on page 4.1-39). An additional photosimulation should be provided depicting the appearance of the proposed subtransmission poles and lines on the west side of the freeway because it is designated as part of the City's Scenic Highway System and because a residential neighborhood is located on this west side. The photosimulation should use the maximum potential TSP riser height, which is 85' per Figure 2-9e on page 2-25.
- 15. <u>Retaining Wall Design on East Side of Highway 23</u>: The Draft EIR shows a gabion retaining wall on the east side of the 23 Freeway (Figure 4.14 on page 4.1-39). This proposed wall will be highly visible from the 23 Freeway which is part of the City's Scenic Highways System. If subtransmission poles and access road are ultimately approved by the CPUC at this location, the retaining wall should be composed of a reinforced masonry split-face block, designed to blend in color with the natural hillside and softened in appearance with plantings of native plant species in order to reduce the visual impact from the 23 Freeway.
- 16. <u>Tree Impacts</u>: The Final EIR should provide an inventory of trees along Read Road and Sunset Valley Road that may be impacted by the subtransmission lines. The DEIR estimates that trees will be impacted (Page 4.4-42), and that large trees within the alignment appears to be fewer than 20 in total. The DEIR, however, does not identify the location, species, size or number of trees that would be affected by the overall project. Every effort should be made to avoid impacts to existing tree canopies and root systems along the proposed alignment, consistent with the City's policy to protect mature trees or tree groupings (City Resolution No. 2005-011, Section F, Architectural Design Review Guidelines and Standards for Commercial Projects). The following additional impact and mitigation measure is recommended, based on the narrative on page 4.4-42 of the DEIR:

Impact 4.4-8: The Proposed Project could adversely impact oak trees, City landmark trees, and mature ornamental species along the subtransmission line route. Less than significant with mitigation (Class II).

Mitigation Measure 4.4-8a: SCE and/or its contractors shall, through project design, avoid impacts to existing trees to the greatest extent feasible, and shall consult with County and local municipalities prior to any tree alteration or removal. If tree impacts cannot be avoided, SCE shall consult with a certified arborist and obtain permits, as applicable, from the County and local agencies. Tree replacements shall be provided consistent with the requirements and intent of the relevant agency or municipality.

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A14-29

Conclusion

The City believes that "System Alternative B" (substation upgrades using non-standard transformers) warrants further investigation, and that "System Alternative A" (substation upgrades using standard-sized equipment) and "Alternative Substation Alignment 4" (full undergrounding of subtransmission lines) should be considered as project alternatives in the Final EIR. "Alternative Subtransmission Alignment 3" (partial undergrounding of subtransmission lines) is a viable alternative if the subtransmission lines are not located entirely underground. The City also requests the CPUC's consideration of other, more specific comments as outlined above.

A14-31

Thank you again for considering these comments and recommendations. If you have any questions regarding these comments, please do not hesitate to contact me at (805) 449-2340, or at mtowne@toaks.org.

Sincerely,

Man E

Mark A. Towne, AICP Deputy Director/City Planner

C: Scott Mitnick, City Manager Mark Watkins, Interim Assistant City Manager Chris Norman, Interim City Attorney John Prescott, Community Development Director Proceeding A0812023 Service List Dated November 8, 2011

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3.2.14 Letter A14 – Responses to Comments from City of Thousand Oaks

- A14-1 The commenter requests additional information about System Alternative B. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-2 The commenter recommends full evaluation of Alternative Subtransmission Alignment 4 in the Final EIR. See Master Response 1, *Alternatives* in Section 3.1.1. The commenter's support of Alternative Subtransmission Alignment 3 is noted.
- A14-3 The commenter recommends that the demand estimates be revised in order to reconsider System Alternative A. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-4 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-5 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-6 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-7 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-8 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-9 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.

- A14-10 The commenter requested additional information about System Alternative B. Because System Alternative B has been eliminated, the requested information is no longer necessary or relevant. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-11 The commenter of Thousand Oaks recommends inclusion of Alternative Subtransmission Alignment 4 in the Final EIR. See Master Response 1, *Alternatives* in Section 3.1.1 and Response A14-12 below.
- A14-12 Alternative Subtransmission Alignment 4, which would construct the entire subtransmission alignment underground, would require more subsurface excavation than the Proposed Project and therefore could potentially cause a significant impact to a greater number of as-yet-unknown subsurface cultural resources as well as increased impacts to air quality, noise, and traffic, compared to the Proposed Project, as a result of increased ground disturbance and offhaul. Therefore, Alternative Subtransmission Alignment 4 would not avoid or substantially lessen the significant effects of the project on cultural resources. As the commenter notes, mitigation measures similar to those proposed for the Proposed Project could be applied to Alternative Subtransmission Alignment 4. See also Response A14-13.
- A14-13 The commenter recommends undergrounding of the overhead subtransmission line on Read Road west of Sunset Valley Road, and on Sunset Valley Road, to reduce aesthetic impacts. The commenter is referred to Draft EIR Chapter 3, *Alternatives and Cumulative Projects*, and Master Response 1, *Alternatives* in Section 3.1.1. Alternative Subtransmission Alignment 4 would have undergrounded the entire subtransmission alignment, but was eliminated during the EIR screening process for reasons described on page 3-27: "Alternative Subtransmission Alignment 4 was eliminated from consideration because impacts to air quality and noise resources would increase and an additional potentially significant cultural resources impact would occur. In addition, the impacts on aesthetic resources would not be reduced more than under Alternative Subtransmission Alignment 3 which also reduced noise and air quality impacts and was carried forward for analysis." Section 3.5 under the heading *Rationale for Elimination* has been amended as follows to clarify this issue:

Alternative Subtransmission Alignment 4 would be technically feasible and capable of meeting basic project objectives; however, it would not reduce significant environmental impacts to a greater degree than Alternative Subtransmission Alignment 3, which was carried forward for complete analysis.

Similar to the Proposed Project noise and air quality impacts would be significant unavoidable but to a greater degree. ConstructionIn order to underground the entire subtransmission alignment, construction emission

levels (air quality impacts) and noise impacts would increase <u>compared to</u> <u>the Proposed Project</u> due to the increased trenching and duct bank construction required compared to the Proposed Project. <u>This alternative</u> <u>would result in significant</u>, <u>unavoidable noise and air quality impacts</u>. <u>While</u> the impact classification is the same as the Proposed Project (significant, <u>unavoidable</u>), the actual emissions and noise impacts would be greater.

Impacts on aesthetic resources would be reduced to a level of less than significant in the same manner as Alternative Subtransmission Alignment 3.

Undergrounding the subtransmission lines under this alternative would reduce the visibility of the Proposed Project along Sunset Valley Road and the segment extending west from the intersection of Read Road and Sunset Valley Road. However, while beneficial, the impact to aesthetic resources in these locations has been reduced to a less than significant level with implementation of Mitigation Measures 4.1-2a and b. The significant, unavoidable aesthetic resource impacts created by the subtransmission lines occur at Olsen Road, near the proposed Presidential Substation. Alternative Subtransmission Alignment 3 and Alternative Subtransmission Alignment 4 both reduce impacts to aesthetic resources to a less than significant level in this location. However, Alternative Subtransmission Alignment 4 would result in increased impacts to air quality and noise resources. Therefore Alternative Subtransmission Alignment 3 would be environmentally superior to Alternative Subtransmission Alignment 4 and was carried forward for analysis.

In addition, preliminary analysis of environmental impacts identified cultural resources <u>within</u> for the segment between the origination point with Moorpark-Thousand Oaks No. 2 and the intersection of Read Road and Sunset Valley Road. <u>Alternative Subtransmission Alignment 3 is</u> above ground in this section and avoids impacts to these cultural resources, while Alternative Subtransmission Alignment 4 would create potentially significant impacts to cultural resources in this location.

Alternative Subtransmission Alignment 4 was eliminated from consideration because impacts to air quality and noise resources would increase <u>compared to the Proposed Project</u> and a new potentially significant impact to cultural resources could also occur. In addition, the <u>significant</u> impacts on aesthetic resources would not be reduced more than under Alternative Subtransmission Alignment 3 which also reduced noise and air quality impacts and was carried forward for analysis.

Regarding impacts to the Tierra Rejada Greenbelt, the commenter is referred to Response A5-5.

3.2 Agencies and Organizations Responses

- A14-14 The commenter requests that System Alternative A be fully evaluated in the Final EIR. See Master Response 1, *Alternatives* in Section 3.1.1.
- A14-15 The commenter recommends that the demand estimates be revised in order to reconsider System Alternative A. See Master Response 1, *Alternatives* in Section 3.1.1 for a discussion of electrical demand.
- A14-16 The commenter recommends that the demand estimates be revised in order to reconsider System Alternative A. See Master Response 1, *Alternatives* in Section 3.1.1 for a discussion of electrical demand.
- A14-17 The commenter recommends that the demand projections be revised in order to reconsider System Alternative A. The commenter is referred to Master Response 1, *Alternatives*, subsection B, in Section 3.1.1, which explains that System Alternative A was reconsidered subsequent to publication of the Draft EIR, which included updating the project objectives to address the passage of time since the 2008 PEA and revised load forecasts. The CPUC concludes that including System Alternative A in the mix of alternatives analyzed is not warranted because this alternative would ultimately not meet future electrical demand and could potentially have environmental impacts similar to the Proposed Project.
- A14-18 The commenter requests that an alternative substation location identified on Figure 3-1 of the Draft EIR as the Stellar Substation be considered as an alternative site in the Final EIR. Based on information from SCE, there is no Stellar Substation and the site indicated on the map is actually a parcel of land owned by SCE acquired in the 1980s. Although no "Stellar Substation" ever came to fruition there, its name and location were in a layer of data used to prepare Figure 3-1 for the Draft EIR. As such, it was inadvertently included on the Figure. No mention/description/consideration of it appears anywhere else in the Draft EIR. As discussed in Response A5-1, an EIR needs to consider a reasonable range of alternatives and not consider every conceivable alternative. However, the commenter has requested that this Stellar Substation site be evaluated as an alternative. Seven sites (including the Proposed Project site) were screened and evaluated in Section 3 of the Draft EIR. The two sites carried forward for analysis are located near the center of the ENA and are able to technically interconnect with the three existing ENA substations. The Stellar site is located far to the top of the ENA, in close proximity to Royal Substation. Although not carried forward for analysis, due to its proximity to the Royal Substation and distance from the Potrero and Thousand Oaks substations it would most likely be considered too far from the area where the distribution circuits overlap (between the three ENA substations) to provide additional operational flexibility and reliability. The CPUC concludes that analysis of the Stellar Substation site is not necessary to analyze a reasonable range of alternatives, and will not be added for consideration.

For additional information on considered alternatives, see Master Response 1, *Alternatives* in Section 3.1.1.

- A14-19 The comment provides specifications regarding which plants should be used to screen the substation facility, including the perimeter wall, and accepts SCE's offer to review the proposed perimeter wall and planting plan. Comment noted. As discussed in Response A3-2, prior to the start of construction, SCE would submit a landscaping plan and perimeter wall design to the City of Thousand Oaks for review and approval as part of the grading permit application for the Proposed Project. Mitigation Measure 4.1-8a would ensure that this design development and review process considers the need to maximize screening of the Substation using trees, shrubs, other landscaping, and appropriate wall design.
- A14-20 The comment requests that a photometric analysis be prepared as part of the proposed lighting plan, to ensure compliance with Mitigation Measure 4.1-9, and that the City of Thousand Oaks be allowed the opportunity to review and comment on the draft lighting plan. To ensure compliance with City of Thousand Oaks design guidelines, Mitigation Measure 4.1-9a has been modified as follows:

Mitigation Measure 4.1-9a: SCE shall design and install all lighting at project facilities, including construction and storage yards and the staging area, such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. SCE shall submit a *Construction and Operation Lighting Mitigation Plan*, which includes a photometric analysis indicating that these objectives would be achieved under SCE's proposed lighting design, to the City of Thousand Oaks and the CPUC for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SCE shall not order any exterior lighting fixtures or components until the *Construction and Operation Lighting Mitigation Plan* is approved by the City of Thousand Oaks and the CPUC. The Plan shall include but is not limited to the following measures...

A14-21 The comment notes that Conejo buckwheat and Santa Susana tarplant should be discussed in the Draft EIR because they are both considered rare. For the sake of conciseness, the Draft EIR provided a detailed life history description only for federal and State-listed threatened or endangered plant species that may occur in the project area. For non-listed special-status plant species such as Conejo buckwheat and Santa Susanna tarplant, habitat requirements were briefly provided in Draft EIR Table 4.4-1 (page 4.4-14). Focused botanical surveys performed for the Proposed Project did not detect Conejo buckwheat or Santa Susana tarplant at the proposed Presidential Substation site, the proposed subtransmission alignments, Alternative Substation Site B, or within Subtransmission Alignment 3 (see Bonterra, 2009). Additionally, neither Conejo

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buckwheat nor Santa Susana tarplant are reported by the CNDDB in the project study area, as shown in Draft EIR Figure 4.4-1 (page 4.4-8). Because the potential to encounter these species in Alternative Subtransmission Alignment 1 and Alternative Subtransmission Alignment 2 is considered to be only moderate, detailed botanical surveys were not performed of these areas.

- A14-22 The survey reports cited in the comment are included in the project record and are available in digital format for public review upon request. As cited in the Draft EIR Biological Resources references section (Draft EIR, page 4.4-45), these include the *Biological Constraints Survey for the Presidential Substation Project* (Bonterra, 2008); *Results of Special Status Plant Surveys for the Presidential Substation Project* (Bonterra, 2009); *Results of Focused Presence/Absence Surveys for the Coastal California Gnatcatcher for the Presidential Substation Project* (Bonterra, 2010a); *Results of the Riverside Fairy Shrimp Habitat Assessment Survey for the Presidential Substation Project* (Bonterra, 2010c). A list of common and special-status plant species that were found during 2009 botanical surveys is included as Attachments A and B in the Bonterra (2009) botanical report, which is part of the public record for the Draft EIR.
- A14-23 Critical habitat boundaries are established by the USFWS to provide suitable protective buffers to populations of listed species that they are intended to protect. The Proposed Project is located outside of designated critical habitat for Lyon's pentachaeta and greater than 500 feet from any documented Lyon's pentachaeta populations. Furthermore, special-status plant surveys were performed during an appropriate seasonal period when Lyon's pentachaeta reference populations were readily identifiable; however, this species was not identified on the proposed Presidential Substation site, or within a sizeable study buffer (see Bonterra, 2009). The botanical surveys included nearby and adjacent natural areas including most of the adjacent designated critical habitat unit for Lyon's pentachaeta. Based on protocol-level survey findings, Lyon's pentachaeta populations do not occur on or adjacent to the proposed Presidential Substation site and additional botanical surveys are not warranted.
- A14-24 The comment notes that CDFG should review the Noxious Weed and Invasive Plant Control Plan, in addition to the Ventura County Office of the Agricultural Commissioner and the CPUC, as stated in Mitigation Measure 4.4-1. In their comments on the Draft EIR, CDFG did not request to review the plan (Comment Letter A4); thus, the stated approach remains valid with the County and CPUC providing review of the Noxious Weed and Invasive Plant Control Plan. The comment is noted.

A14-25 Based on information received from SCE subsequent to publication of the Draft EIR, the 5,440 trucks cited by the commenter has been updated to 4,000 trucks, and the number of fill deliveries per day has been changed from 60 to 45. The following revisions have been made to the Draft EIR:

Chapter 2, Project Description, page 2-34:

Approximately 5,4404,000 truckloads of fill would be required to bring the site up to grade. Filling operations would be completed within the first three months of construction delivering approximately 45,60 truckloads per day if operating seven days per week.

Section 4.15, Transportation and Traffic, page 4.15-10:

The Proposed Project would require approximately 40,000 cubic yards of fill, which would generate approximately $5,440 \pm 0.000$ truck loads to bring the fill to the proposed Presidential Substation site from offsite locations. assuming an average truck capacity of 10 cubic yards (SCE, 2012d). Grading is expected to take 90 work days and assuming that the truck trips are divided evenly over the 90 days, there would be approximately $\frac{60}{45}$ fill deliveries per day, or $\frac{120.90}{120.90}$ one-way truck trips. The impact from the additional $\frac{120.90}{120.90}$ truck trips would include short-term and intermittent lessening of roadway capacities due to slower movements and larger turning radii of the trucks compared to passenger vehicles.

Section 4.15, *Transportation and Traffic*, Page 4.15-17:

The location for the proposed Presidential Substation for Alternative Subtransmission Alignment 1 would be the same as the Proposed Project, thus, approximately 60-about 45 daily round-trip truck trips would be required to bring fill to the site.

Regarding haul routes, the Draft EIR's Mitigation Measure 4.15-1b requires that SCE prepare and implement a Traffic Management Plan subject to approval of the appropriate state agency and/or local government(s), and that the Plan shall include a discussion of haul routes.

- A14-26 Regarding proposed pole heights and diameters as depicted in the visual simulations in Draft EIR Section 4.1, *Aesthetics*, see Response A5-4.
- A14-27 The commenter requests that the Final EIR provide a visual simulation depicting the proposed subtransmission alignment crossing Olsen Road northwest of the proposed Presidential Substation. The simulations in Figures 4.1-7a and 4.1-7b show the view from Olsen Road looking south toward the proposed Presidential Substation at three timeframes after construction (one to two years, five to ten

years, and at full growth). This key observation point was chosen specifically because Olsen Road represents a highly traveled road in the project area, is a designated scenic highway in the City of Thousand Oaks, and captures views of both the proposed Presidential Substation and a portion of the proposed subtransmission alignment. These simulations, in conjunction with the qualitative descriptions of the visual change that would be perceived by viewers provided on Draft EIR pages 4.1-50 through 4.1-52, provide a comprehensive analysis of the aesthetic impacts of the subtransmission poles on Olsen Road. Even with implementation of Mitigation Measures 4.1-3a and 4.1-3b, impacts would remain significant and unavoidable.

- A14-28 The commenter requests that the Final EIR provide a visual simulation depicting the proposed subtransmission alignment west of Hwy 23. As noted by the commenter, Figure 4.1-4 in the Draft EIR provides the existing view and a simulated view from Hwy 23, southbound looking south, which shows a portion of the proposed subtransmission alignment east of Hwy 23. This key observation point was chosen because it represents the location on Hwy 23 from which the Proposed Project is most visible. Motorists heading south on Hwy 23 would have clear views of the proposed subtransmission alignment to the east of Hwy 23, while the portion of the proposed subtransmission alignment to the west of Hwy 23 would be fully obscured by intervening topography until just prior to crossing the line. Because the view portrayed in Figure 4.1-4 represents a similar but more visible perspective than the view looking west, it was chosen as a simulation viewpoint. Visual impacts to motorists on Hwy 23 and Read Road are analyzed under Draft EIR Impact 4.1-2, and were found to be less than significant with mitigation.
- A14-29 The commenter recommends that the Hilfiker Wall and reinforced geogrids that would be constructed just east of Hwy 23 be composed of reinforced masonry split-face block, and designed to blend in color with the natural hillside using native plant species. To ensure compliance with City of Thousand Oaks design guidelines, Mitigation Measure 4.1-2c has been added to the analysis for Impact 4.1-2. The following changes have been made to Draft EIR Section 4.1, *Aesthetics*:

Page 4.1-47:

Implementation of these measures would result in a low to moderate visual change to the project area. Although the retaining wall would continue to contrast with the scenic backdrop, it would not dominate the landscape or demand attention, particularly as viewers would be exposed to it for a short distance and given the presence of other structures in the viewshed (i.e., highway signs, the highway median barrier, satellites and antenna). Visual impacts to Hwy 23 would be less than significant with mitigation...

Mitigation Measure 4.1-2c: Prior to the start of construction of the Hilfiker wall and reinforced geogrids visible from Highway 23, SCE shall consult with the City of Thousand Oaks to develop an appropriate landscaping plan and wall design that would be submitted with the grading permit application for the Proposed Project.

A14-30 Subsequent to publication of the Draft EIR, SCE provided an arborist report which contained an inventory of trees on Read Road and Sunset Valley Road (see Section 3.4.1 for a copy of the report). The findings are incorporated into the Final EIR as shown in this response.

> The location, species, number and size of trees that occur in Read Road and Sunset Valley Road is inventoried in the BioResources Consultants, Inc. (2011) arborist report; however, the report does not estimate project impacts to protected and non-protected trees, or specify the type of impact that could be encountered from the Proposed Project. The number of trees identified in the alignment in the Draft EIR (approximately 60 trees) is comparable to the number of trees presented in the 2011 arborist report (55 trees). Despite providing more detail on the location of trees relative to the proposed alignment, the arborist report does not offer details regarding the character of anticipated impacts (e.g., whether tree removal or trimming is required, or possible root damage to individual trees). Thus, the impact to protected trees by project activities remains uncertain at the time of Final EIR publication.

> The Draft EIR identified on page 4.4-42 that the Applicant would consult with local municipalities prior to any tree alteration or removal. The suggestion to add a mitigation measure that requires consultation with Ventura County and local municipalities is noted; however, such an addition is not required because compliance with local ordinances is required independent from CEQA requirements. Such compliance would ensure that there is no impact pursuant to CEQA. The following changes have been made to Draft EIR Section 4.4, *Biological Resources* beginning on Page 4.4-41 to incorporate information contained in the arborist report.

Three local jurisdictions have ordinances protecting trees: Ventura County, the City of Thousand Oaks and the City of Simi Valley. Impacts to trees <u>Trees</u> identified in local ordinances may occur <u>be affected by</u> during construction of the Proposed Project, principally along Read Road. The existing subtransmission line that would be replaced on Read Road spans about 5 dozen large the dripline or Tree Protection Zone⁵ of 12 native and <u>43 non-native</u> trees of various species- that are between 6- and 72-inches in diameter (BioResource Consultants, Inc., 2011). A Certified Arborist Assessment in 2011 inventoried the location, species, number and size of

⁵ The BioResource Consultants, Inc. (2011) report defines the Tree Protection Zone as the area within 5-feet of the dripline.

trees in the subtransmission line alignment; however, the assessment does not estimate impacts to protected and non-protected trees, or specify impacts that could be encountered from the Proposed Project. The arborist report did not identify the character of anticipated effects, such as whether or not tree removal or trimming is required, or characterize the potential for root damage to individual trees.

Presumably, the proposed subtransmission alignment would follow a similar alignment to the existing distribution line and the removal or trimming of an undetermined number of individual trees may be needed to accommodate the new pole locations. Based on a review of digital aerial photographs, the number of large trees that occur within the alignment appears to be fewer than 20. Based on the Certified Arborist Assessment, excavation from the Proposed Project could potentially affect up to 55 trees along the proposed alignment due to soil compaction around trees, root exposure, root damage or trimming, resulting in degradation of an individual tree or loss of trees (BioResource Consultants, Inc., 2011). However, SCE has committed to complying with local ordinances pertaining to tree removal and modifications, including obtaining permits consistent with the conditions of the local agencies (see Proponent's Environmental Assessment (PEA) page 4-67 et. seq, and Draft EIR Section 4.4, Biological Resources, Regulatory Context, pages 4.4-26 through 4.4-32). Such compliance would ensure there is no impact pursuant to CEQA.

A14-31 The City supports further investigation of System Alternative B, System Alternative A, and Alternative Subtransmission Alignment 4. Additional investigation of System Alternatives A and B was conducted in response to comments and new information received subsequent to publication of the Draft EIR; see Master Response 1, *Alternatives* in Section 3.1.1.

Megan Steer

From: Sent: To: Subject: Attachments:	Jonathan Evans [jevans@biologicaldiversity.org] Tuesday, November 15, 2011 12:09 PM Presidential Substation Project CBD DEIR comments on A.08-12-023- Presidential Substation RE: A.08-12-023- Request for extension of comment period on -; 2011-11-15.CBD Presidential DEIR Comments.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

Dear Ms. Mosley,

Attached you will find comments on the Draft Environmental Impact Report (DEIR) for the Presidential Substation Project, Application Number 08-12-023 (Proposed Project). Per our attached communications we are submitting redacted documents and filing the non-redacted documents under seal. I will also be sending exhibits to these comments in a subsequent email.

We will be sending duplicate hardcopies of the attached documents and electronic exhibits on CD via Federal Express.

Should you have any problems with these attachments please contact me.

Thank you for your assistance,

Jonathan Evans Toxics and Endangered Species Campaign Director, Staff Attorney Center for Biological Diversity 351 California St., Ste. 600 San Francisco, CA 94104 work- (415) 436-9682 x318 cell- (213) 598-1466 www.biologicaldiversity.org

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November 15, 2011

RE: Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023)

Dear Ms. Mosley,

These comments are submitted on behalf of the Center for Biological Diversity (Center) on the Draft Environmental Impact Report (DEIR) for the Presidential Substation Project, Application Number 08-12-023 (Proposed Project). The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 320,000 members and e-activists throughout California and the western United States, including in Ventura County.

I. INTRODUCTION

The Center supports the DEIR's conclusion that System Alternative B is the feasible Environmentally Superior Alternative and opposes the unnecessary and unneeded environmental impacts that would result from the Proposed Project. As required by the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) must adopt System Alternative B, the environmentally superior alternative outlined in the DEIR. CEQA is clear that when "there are feasible alternatives or feasible mitigation measures that would accomplish most of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal. App. 4th 1349, 1371, *citing* Pub. Resources Code, § 21002; Guidelines § 15091; *see also* Pub. Resources Code, § 21002(b)(1); CEQA Guidelines § 15021(a)(2)).

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The environmentally superior alternative meets most of the project objectives, while avoiding the significant impacts that would result from the Proposed Project. (DEIR at 3-9, ES-18, ES-19). Furthermore, the environmentally superior alternative is feasible and would actually benefit ratepayers while avoiding the significant negative impacts of the Proposed Project. (DEIR at 3-9; Exhibit 2- D. Marcus Comments).

Southern California Edison's (SCE) Proposed Project involves the construction of a new 66/16 kV distribution substation on an approximately 4-acre site, four new 16kV distribution getaways at the proposed Presidential Substation, the replacement of 89 existing subtransmission poles with approximately 66 new subtransmission poles and the installation of a 66kV subtransmission conductor and underground facilities. As of 2011 the Proposed Project would cost approximately \$55 million dollars. (SCE 5/3/2011, Question 2). The Proposed Project is located in the City of Thousand Oaks and unincorporated Ventura County, California. The Proposed Project will have many negative significant environmental effects on aesthetics, air quality, biological resources, and noise in the area.

Despite the diligent work of environmental consultants and staff at the CPUC the DEIR falls short of the standards for adequacy under CEQA. The CPUC must revise and recirculate the DEIR in order to meet the fundamental information disclosure and analysis requirements of CEQA. The DEIR fails to address many issues raised below, as well as many of the comments previously provided by the Center during the environmental review process. (CBD NOP Comments 3.19.09 & CBD NOP Comments 9.27.10).

II. PROJECT DESCRIPTION

A. The DEIR's Project Objectives are based on Incorrect Electrical Demand Forecasts

One of the fundamental flaws of the DEIR is its reliance on the incorrect "long term electrical demand requirements in the [Electrical Needs Area] as defined in the proponent's application and the Proponent's Environmental Assessment." (DEIR at ES-5.) The inaccurate project objectives to meet a hypothetical "long term electrical demand" provided in the PEA prevents the public and the CPUC from properly evaluating the Proposed Project and Alternatives. (*See* CEQA Guidelines § 15125(b)).

CEQA requires an EIR to include a complete and accurate project description. The project description must include a statement of the project's objectives. CEQA Guidelines §15124. An inaccurate, misleading, or curtailed project description prevents the public and the decision-making agency from adequately evaluating the project. (*See County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 192-193).

The DEIR states "the purpose of the Presidential Substation Project is to meet the forecasted electrical demands in the cities of Simi Valley and Thousand Oaks, as well as adjacent areas of Ventura County". (DEIR at 1-1). The DEIR refers to the cities of Simi Valley and Thousand Oaks and the adjacent areas of Ventura County as the Electrical Needs Area (ENA). The two Project Objectives are to "meet long term electrical demand requirements in the ENA as

A15-2

defined in the proponent's application and the Proponent's Environmental Assessment (PEA)" and to "improve electrical system operational flexibility and reliability by providing the ability to transfer load between 16kV distribution circuits and 16kV distribution substations within the ENA". (DEIR at ES-3). Both the Overview of the Proposed Project and the Project Objectives sections fail to give specific data regarding the forecasted electrical demands for the ENA. The Project Objectives section references the PEA and the proponent's application as the source of the electrical demand requirements projected for the ENA.

The PEA explains that the maximum operating capacity of the current substations in the ENA is presently limited to 400 MVA. Table 1.1 and Figure 1.2 of the PEA give the actual peak demands for the years 2004-2008 and SCE's forecast demands for the years 2009-2018. (PEA at 1-2 & 1-7). According to SCE's forecasts, the Projected Peak Demand under Normal Conditions would exceed the current maximum operating limit of 400 MVA in 2016 and the Project Peak Demand for a 1-in-10 Year Heat Storm would exceed 400 MVA in 2011, when the projected peak demand would be 401 MVA if a 1-10 year heat storm was to occur.

The projections listed above are based on analysis done by SCE in 2008 (PEA at 1-7). Actual peak demand for years 2009 and 2010 has not been added to SCE's analysis, which is a major flaw in the DEIR. The actual need for 2009 and 2010 was much less than SCE's 2008 projections stated in the PEA.

i. The Project Objectives are Incorrect and Outdated

The two project objectives identified by the CEQA team essentially involve meeting long term electrical demands and improving electrical system operational flexibility and reliability. The objectives are based on the project objective SCE identified in its PEA which was created in 2008. (DEIR at 1-2). On November 23, 2010, SCE filed a General Rate Case application to raise its customers' rates for the period of 2012-2014. (California Division of Ratepayer Advocates). According to the SCE 2012 General Rate Case Application Capital Workpapers (Part 1), the purpose of the Proposed Project is "load growth in the Simi Valley and Thousand Oaks areas". (SCE 2010(a) at 73). Also, another set of Workpapers (Part 6), classifies the Presidential Substation Project as a "Load Growth" project. (SCE 2010(b) at 391). The other project type choices that were available as selections are "Customer Growth", "Reliability", "Capitalized Software" and "Various". (SCE 2010(b) at 391).

The information from the two above mentioned Workpapers regarding the purpose and type of the Proposed Project conflicts with the project objectives in the DEIR. It seems that if the objectives in the DEIR are still up-to-date and correct then the first Workpaper (Part 1) would

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A15-5

have mentioned long term electrical demand and operational flexibility and reliability as the purpose of the Proposed Project. Further, the fact that the second referenced Workpaper (Part 6), states that the Proposed Project is a "Load Growth" project as opposed to a "Customer Growth" or a "Reliability" project suggests that the project objectives as stated in the DEIR are incorrect and outdated. The DEIR should be updated to reflect the new project objectives according to the information provided in the Workpapers. The testimony also seems to conflict with other testimony provided by SCE regarding the purpose and need for the Proposed Project. (Quanta 2011).

The DEIR's claims that General Order 131-D establishes a "distinction" in the review levels that permits it to circumvent CEQA's requirements for a complete and accurate Project Description and Objectives must be rejected. (DEIR at App. A.1-40, App. A.2-31). CEQA requires that the "EIR must contain facts and analysis, not just the bare conclusions of a public agency... the public and decision makers, for whom the EIR is prepared, should also have before them the basis for that opinion so as to enable them to make an independent, reasoned judgment." (*Kings County Farm Bureau v. City of Hanford*, (1990) 221 Cal. App. 3d 692, 736). The DEIR must provide the facts and analysis of actual decreased electrical demand, as opposed to the inflated hypothetical electrical demand claimed by SCE in the PEA.

B. Inadequate Description of the Electrical Needs Area, Adjacent Substations, and Project

An accurate and stable project description and description of the existing environmental conditions is a necessary precedent to any informed review of a Project and is required under CEQA. (CEQA Guidelines § 15125(a)). It is also critical for this Project in particular because SCE states that the Project objectives are to meet the electrical demand and improve flexibility in the ENA. (DEIR at ES-4, ES-5.) Unfortunately the DEIR fails to provide an accurate description of the Project Area as it relates to the ENA and associated substations by omitting substations that service the ENA from the analysis.

There are eleven 66/16 kV distribution stations and three 66kV customer substations within the Moorpark system encompassing this Project. (PEA at 1-2, fn.1). However, the DEIR limits the analysis of substations to only three in a contorted and gerrymandered Electrical Needs Area proposed by SCE. (DEIR at 2-4; PEA at Figure 1.1). This improperly constrained and distorted description of the area affected omits the neighboring Moorpark, Newbury Park, and Oak Park substation, among others. The DEIR must fully evaluate the impacts, interdependencies and interactions among the Proposed Project and all of the proposed substations and transmission line, 2272-E (U 338-E),¹ and the Oak Park substation. Both of these neighboring substations were omitted from any analysis in the DEIR. Furthermore, this constrained Project area description and objectives improperly narrows a reasonable range of alternatives for consideration. (*See e.g. Carmel by the Sea v. US Department of Transportation* (9th Cir. 1997) 123 F.3d. 1142, 1155 (interpreting purpose and need in the NEPA context)).

¹ Application available at http://www.sce.com/NR/sc3/tm2/pdf/2272-E.pdf.

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A15-7

A15-8

Additionally, all high voltage powerlines, circuitry, and substations capable of transferring power to or from the Electrical Needs Area should be disclosed and analyzed to provide for an accurate Project description and analysis of reasonable alternatives to the Proposed Project. Unfortunately, the DEIR fails to describe substations and circuitry that are capable of transferring power to and from the Project area such as Newbury and Oak Park substations and circuitry. (DEIR at Figure 3-1). Therefore, the DEIR must be revised and recirculated to address the actual Project area and substations serving the ENA.

The DEIR must analyze how transmission and distribution resources outside the ENA may affect the Proposed Project's transmission capability and need as well as how these additional resources might affect the timing and need of meeting the electrical demand, flexibility, and reliability in the ENA. The DEIR must disclose and analyze the electrical substations and electrical transmission lines serving the cities of Thousand Oaks, Simi Valley, Moorpark, Agoura Hills, Westlake Village and the surrounding portions of unincorporated Ventura and Los Angeles County including Oak Park. The DEIR must also include a complete evaluation of the interaction between the Proposed Project and the Moorpark-Newbury 66 kilovolt (kV) subtransmission line, 2272-E (U 338-E), and all of the substations within the a broad multi-city area including the Newbury Park, Moorpark, and Oak Park substation. The DEIR must fully disclose and analyze the current conditions and any upgrades to substations that affect the electrical needs area like the upgrade of the Moorpark-Newbury 66 kilovolt (kV) subtransmission line, 2272-E (U 338-E).

Furthermore, the DEIR contains vague details regarding components of the Project that prohibit the public from adequately analyzing the Project's impacts. For example, the DEIR states that the "existing 16 kV distribution line will be transferred "onto new subtransmission poles or to newly constructed underground facilities." (DEIR at ES-4). Unfortunately, it is unknown, which of the two possible components would be used and thus it is not possible to analyze Project's impacts because of shifting project description.

C. Improper Segmentation and Piecemeal Review of Proposed Project

The DEIR analyzes the potential impacts from the Proposed Project which includes the construction, operation and maintenance of the following components:

- Construction of a new 66/16 kV distribution substation (proposed Presidential Substation) on an approximately 4-acre site;
- Replacement of existing 16 kV distribution and subtransmission poles with new subtransmission poles and installation of 66 kV subtransmission conductor to supply the proposed Presidential Substation;
- Installation of underground 66 kV subtransmission facilities for the portion of the route crossing Highway 23 (Hwy 23);
- Construction or relocation of related 16 kV distribution components, including four new 16 kV distribution getaways at the proposed Presidential Substation, and relocation, transfer, or upgrade of existing 16 kV distribution facilities either to new subtransmission poles or to new underground 16 kV distribution facilities.

Upgrades to new 16 kV distribution would involve installation of new conductors instead of re-hanging or burying the existing 16 kV conductor; and

• Construction of facilities to connect the proposed Presidential Substation to SCE's existing telecommunications system.

(DEIR at 2-3).

The Project Description chapter of the DEIR goes on to state that the proposed Presidential Substation will be built to accommodate one additional 66 kV subtransmission source line and eight additional 16 kV distribution getaways at ultimate build-out. (DEIR at 2-7). The SEIR also states that because "ultimate build-out is not identified within SCE's 10 year planning period ... the potential ultimate build-out is not included as part of the Proposed Project analyzed within this EIR". (DEIR at 2-7). According to the DEIR, additional CEQA review and a separate "Permit to Construct" application would have to be approved by the CPUC in order for the additional 66 kV subtransmission line to be built; but, the eight additional 16 kV distribution getaways are not subject to additional CEQA analysis or CPUC review. (DEIR at 2-7).

The above-mentioned additional components that the Proposed Project will be built to accommodate are substantial and are equivalent to the major portions of the Proposed Project. Thus, the additional subtransmission line and eight 16 kV distribution getaways will have significant impacts, resulting in the Proposed Project having substantially more negative impacts on the environment than are addressed and analyzed in the DEIR.

i. Additional Subtransmission Line

The additional 66 kV source subtransmission line would supply power to the Presidential Substation in addition to the two 66 kV subtransmission lines that are part of the Proposed Project. The proposed subtransmission lines will bring 66 kV of power to the proposed Presidential Substation from the Moorpark-Royal No.2 and Moorpark-Thousand Oaks No.2 substations. (DEIR at 2-18). The two proposed 66 kV subtransmission lines will be overhead on either side of Highway 23 and will be underground (appx. 750 ft) in order to cross Highway 23. (DEIR at 2-27). The installation of the two lines will require the installation of 66 new subtransmission poles which range from 60 to 100 feet above ground surface. (DEIR at 2-19). The installation of these new poles also requires the construction of their concrete bases which range from five to seven feet in diameter and extend between approximately twelve to forty feet below ground surface. (DEIR at 2-27).

According to the above-mentioned component details for the two proposed source subtransmission lines, the construction of an additional 66 kV source subtransmission line would be a major project and have serious impacts. Due to the fact that the construction of the Proposed Project will result in the construction of the additional 66 kV source subtransmission line sometime in the future, the impacts from the construction of the new line should also be considered in the DEIR. The installation of an additional 66 kV subtransmission line will result in the construction of many new subtransmission poles, which will have detrimental impacts on a

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biological resources, air quality, aesthetics, greenhouse gas emissions, cultural resources, water quality, and potentially other resources in the area.

The CEQA Guidelines define project to mean "the whole of an action" that may result in either a direct or reasonably foreseeable indirect physical change to the environment. (CEQA Guidelines §15378(a)). "'Project' is given a broad interpretation in order to maximize protection of the environment." (*McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District*, (1988) 202 Cal.App.3d 1136). Applying the CEQA Guidelines, the additional subtranmission line should be included in the environmental analysis of the Proposed Project because it is reasonably foreseeable that the line will be constructed in the near future and it will result in physical changes to the environment. Also, the additional 66 kV source subtransmission line is part of the Proposed Project because the Presidential Substation will be built to accommodate the line.

According to the court in *Arviv Enterprises Inc. v. South Valley Area Planning Commission*, "environmental considerations do not become submerged by chopping a large project into many little ones – each with a minimal potential impact on the environment – which cumulatively may have disastrous consequences". ((2002) 101 Cal. App. 4th 1333, 1346). In the present case, the Proposed Project will have substantial environmental impacts and the construction and installation of the additional subtransmission line will also have serious environmental impacts. The fact that the DEIR does not analyze these impacts in conjunction with one-another and does not even discuss the potential impacts of the additional subtransmission line violates the CEQA Guidelines and is contrary to caselaw. Therefore, the DEIR should be revised because it violates CEQA by improperly piecemealing the project and failing to analyze the impacts of the additional 66 kV source subtransmission line.

ii. Eight Additional Distribution Getaways

The eight additional distribution getaways that the project will be built to accommodate are likely to have serious environmental impacts. The four distribution getaways that are analyzed in the DEIR involve an extensive amount of underground infrastructure. According to the DEIR, the distribution getaways must travel through underground duct banks in order to reach their ultimate destination. (DEIR at 2-11). The duct banks will be tens of thousands of feet long and over three feet in diameter. (DEIR at 2-11). The four distribution getaways discussed in the DEIR will also require the construction of eight underground distribution vaults which are eighteen feet long, seven feet wide and almost five feet deep. (DEIR at 2-12).

Based on the above figures given in the DEIR regarding the four distribution getaways included in the project description, it can be assumed that the installation of eight additional distribution getaways will be a major construction project that will require large amounts of ground moving. The construction of underground facilities is one of the most environmentally destructive aspects of the Proposed Project because of the large amounts of heavy equipment used, which produce greenhouse gas emissions, and the earth moving required, which destroys important biological resources. Given the environmentally detrimental nature of this aspect of

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the Proposed Project, it is alarming that the installation of the eight additional distribution getaways will not be subject to any environmental require or agency oversight. (DEIR at 2-7).

Applying the definition of "Project" given in the CEQA guidelines, the installation of the eight additional distribution getaways should be included in the DEIR's analysis of the Proposed Project because it is part of "the whole of the action" that may result in direct or reasonably foreseeable indirect physical change to the environment. (CEQA Guidelines §15378(a)). Furthermore, "a public agency may not divide a single project into smaller individual projects in order to avoid its responsibility to consider the environmental impacts of the project as a whole". (*Orinda Assn. v. Board of Supervisors*, (1986) 182 Cal. App. 3d 1145, 1171). Here, the DEIR separates the environmental review of the Proposed Project from two subsequent projects it is being built to accommodate. This violates CEQA's rule against project segmentation and is also contrary to caselaw.

The Proposed Project and the eight additional distribution getaways that will eventually be built as a result of the Proposed Project should be considered together in the DEIR. This is especially true because the eight additional distribution getaways will not be subject to environmental review at the time of their construction. "Courts have considered separate activities as one CEQA project and required them to be reviewed together where, for example, the second activity is a reasonably foreseeable consequence of the activity." (*Sierra Club v. West Side Irrigation Dist.*, (2005) 128 Cal. App. 4th 690, 698 , *see also Bozung v. Local Agency Formation Com.*, 13 Cal. 3d 263 (1975)). The situation discussed in *Sierra Club*, is akin to the present situation because the construction and installation of the eight additional distribution getaways. Thus, the construction and installation of the eight additional distribution getaways should be considered as part of the Proposed Project and the DEIR should be revised to include an analysis of the additional environmental impacts.

D. Inadequate Description of the Significance of the Proposed Project as a Wildlife Corridor

The DEIR fails to fully state the importance of the Proposed Project area as a wildlife corridor. According to the CEQA Guidelines, an EIR is required to accurately describe the environmental setting of the project. (CEQA Guidelines §15125). According to the South Coast Missing Linkages Project, "this linkage is one of the few coastal to inland connections remaining in the South Coast region". (South Coast Wildlands(a)). The DEIR also does not state the specific species that use the wildlife corridor, which the Missing Linkages Project identifies as including the mountain lion, mule deer, acorn woodpecker and the Chalcedon checkerspot butterfly. Accordingly, the DEIR is insufficient under the CEQA Guidelines because it did not include a complete and accurate description of the project setting.

Impact 4.4-7 discusses the potential effects the Proposed Project could have on the movement of wildlife in the region. The DEIR states that the Proposed Project will result in a less than significant impact in regards to wildlife movement. This assertion is based on an

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incomplete analysis of effects because it fails to account for the impacts the construction of the Proposed Project will have wildlife moving through the area. The construction of the project will involve loud noises and pollution that are inherent with the use of heavy machinery and will also greatly increase the number of humans in the wildlife corridor. The South Coast Missing Linkages Project identifies noise and pollution as impediments to wildlife movement. (South Coast Wildlands(b)). Construction of the Proposed Project is likely to result in a direct effect to species that use the area surrounding the Proposed Project as a pathway between the Santa Monica Mountains and the Simi Hills and Santa Susanna Mountains. Therefore, the conclusion reached in the DEIR that the Proposed Project will have a less than significant impact on the movement of native wildlife species is incorrect.

III. BIOLOGICAL RESOURCES

A. The Project Must Comply with the Endangered Species Act

The Proposed Project is subject to the Endangered Species Act ("Act"), and must fully comply with the Act's provisions. Section 9 of the Endangered Species Act of 1973, and Federal regulations issued pursuant to section 4(d) of the Act, prohibit the "take" of endangered and threatened species without a special exemption. 16 U.S.C. § 1531 et seq. Section 7 of the Act requires Federal agencies to consult with the United States Fish and Wildlife Service ("USFWS") should it be determined that their actions may affect federally listed threatened or endangered species. "Take" is defined as harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or attempt to engage in any such conduct. (16 U.S.C. § 1532(19)). "Harm" is further defined by USFWS to include significant habitat modification or degradation that actually kills or injures a listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. (50 C.F.R. § 17.3). "Harass" is defined by USFWS as an action that creates the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. (50 C.F.R. § 17.3). "Incidental take" is defined as take that is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. (50 C.F.R. § 17.3). Under the terms of section 7(b)(4) and section 7(o)(2), such incidental taking is not considered to be a prohibited taking under the Act provided that such taking is in compliance with the Incidental Take Statement.

Approval of the Proposed Project will result in harm and harassment of the threatened and endangered species including, but not limited to, the coastal California gnatcatcher and Riverside fairy Shrimp. It also is proposed in areas designated as critical habitat for listed species. Construction and operation of the Project threatens to harm and harass listed species. Private landowners, corporations, state or local governments, or other non-Federal landowners who wish to conduct activities on their land that might incidentally harm wildlife that is listed as endangered or threatened must first obtain an incidental take permit from the U.S. Fish and Wildlife Service. To obtain a permit, the applicant must develop a Habitat Conservation Plan ("HCP"), designed to offset any harmful effects the proposed activity might have on the species. No incidental take statement has been issued, and no Habitat Conservation Plan is present to

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allow for take of threatened species. The Proposed Project cannot proceed in violation of the Endangered Species Act.

The Proposed Project is subject to the Endangered Species Act, and consultation with the USFWS, regarding impacts to threatened and endangered species and critical habitat, must occur. The Proposed Project requires approval from the U.S. Army Corps of Engineers for "[c]onstruction impacting Waters of the United States, including wetlands." (DEIR at 2-57). This discretionary approval makes the project's activities subject to consultation under the Endangered Species Act.

B. The DEIR Fails to Properly Evaluate Impacts to Endangered Species Act Listed Species and their Critical Habitat

As discussed above, the Proposed Project is subject to the Act and must fully comply with its provisions. The Proposed Project would impact final designated critical habitat areas for several federally listed species including the coastal California gnatcatcher, Lyon's pentachaeta, and the Riverside fairy shrimp. This habitat modification and destruction caused by the Proposed Project will "harm" endangered and threatened species in violation of section 9's prohibition of any take of endangered and threatened species without a special exemption. (50 C.F.R. § 17.3 & 16 U.S.C. § 1531 et seq.).

i. Coastal California Gnatcatcher

a. <u>The DEIR Incorrectly States the Results of Focused Presence/Absence Surveys of</u> <u>the Coastal California Gnatcatcher</u>

The coastal California gnatcatcher (gnatcatcher) is a federally listed threatened species. (CDFG 2011). The USFWS published the Final Rule designating critical habitat for the gnatcatcher on December 19, 2007. (USFWS 2007). This designation includes 197,303 acres of land in San Diego, Orange, Riverside, San Bernardino, Los Angeles, and Ventura Counties. The Proposed Project site is located directly within land designated as critical habitat for the gnatcatcher. (DEIR at 4.4-36). The DEIR states that Protocol-level surveys were done for the gnatcatcher in 2008 and 2010 and that "this species was not detected and is considered absent from the alignment." (DEIR at 4.4-36). This statement is in direct conflict with one of the references from the Biological Resources chapter of the DEIR labeled "Result of Focused Presence/Absence Surveys for the Coastal California Gnatcatcher for the Presidential Substation Project, Ventura County, California" (BonTerra 9.29.10) which was created by BonTerra Consulting. The "Survey Results" section states that "the coastal California gnatcatcher" was observed at one location within the Preferred Substation Site." (BonTerra 9.29.10 at 4). According to the survey results, on June 23, 2010, a juvenile gnatcatcher was observed within coastal sage scrub habitat on the northwestern portion of the Preferred Substation Site. (BonTerra 9.29.10 at 4).

The Proposed Project site is located within designated critical habitat for the gnatcatcher and according to Focused Presence/Absence Surveys; a gnatcatcher has used the site as recently

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as late June 2010. (9.29.10 BonTerra at 4). Due to the fact that the gnatcatcher is a federally listed threatened species the Act is applicable. Section 9 of the Act prohibits any "take" of an endangered or threatened species. (16 U.S.C. § 1531 et seq.) As stated above, "take" includes significant habitat modification or degradation that actually kills or injures a listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. (50 CFR § 17.3). The construction and operation of the Proposed Project will modify and degrade the gnatcatcher's habitat which will likely result in impairing its essential behaviors. Therefore, it is very likely that the construction of the Proposed Project will violate section 9 of the Act.

The DEIR states that the project will have a "Less than Significant" impact on the gnatcatcher. This assertion conflicts with the CEQA Guidelines, which require a mandatory finding of significance when "the project has the potential to … reduce the habitat of a fish or wildlife species… reduce the numbers or restrict the range of an endangered, rare or threatened species". (CEQA Guidelines § 15065(a)1; see also Pub. Resources Code § 21083). Section 15065 applies "to the contents of an EIR once it is determined an EIR must be prepared." (*Los Angeles Unified School Dist. v. City of Los Angeles*, (1977) 58 Cal. App. 4th 1019, 1024, fn.6). Here, the Proposed Project site is partially located within designated critical habitat of the gnatcatcher, thus, the project will have a significant impact because it is likely to reduce the habitat and range of the gnatcatcher. This significant effect should be considered during the evaluation of the Proposed Project and the Alternatives.

b. <u>Mitigation Measures 4.4-2a and 4.42b are Insufficient to Reduce the Significant</u> <u>Impacts of the Project to the Coastal California Gnatcatcher</u>

The DEIR states "the implementation of Mitigation Measure 4.4-2a and 4.4-2b would reduce impacts to the coastal California gnatcatcher to less than significant." (DEIR at 4.4-36). Mitigation Measure 4.4-2a does not even refer to the gnatcatcher but instead refers to other special status species known to occur in the area of the Proposed Project site. (DEIR at 4.4-36). Therefore, it is hard to imagine how this Mitigation Measure will do anything to reduce the significant impacts the Proposed Project will have on the gnatcatcher. Mitigation Measure 4.4-2b suggests coordination with CDFG and USFWS regarding coastal scrub avoidance measures as well the creation of a restoration and mitigation plan which will recommend measures to ensure long-term stability. The CEQA Guidelines require mitigation measures to be fully enforceable through legally binding instruments, and not deferred. (CEQA Guidelines § 15126.4(2)). Further, the California Court of Appeal has held that "the requirement that the applicant adopt mitigation measures recommended in a future study is in direct conflict with the guidelines implementing CEQA". (*Sundstrom v. County of Mendocino*, (1988) 202 Cal. App. 3d 296, 306). Thus, Mitigation Measure 4.4-2b is insufficient under CEQA.

The above mitigation measures cannot adequately addresses the impacts to the gnatcatcher through undisclosed surveys and deferred mitigation. Thus, the DEIR incorrectly states that impacts to the gnatcatcher can be reduced to less than significant. The Supreme Court has found that a "potential substantial impact to endangered, rare or threatened species is per se significant." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*

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(2007) 40 Cal.4th 412, 449 (emphasis added) (citing Guidelines § 15065(a)(1)). The DEIR's omission of material necessary for informed decision-making and informed public participation required under law—such as information on impacts to species and mitigation measures—runs contrary to CEQA. (*See Sierra Club v. State Bd. of Forestry* (1994) 7 Cal.4th 1215, 1236–1237).

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ii. Lyon's Pentachaeta

The Lyon's pentachaeta is a federal and State-listed endangered species and a California Native Plant Society List 1B.1 species. The USFWS published the Final Rule designating critical habitat for the Lyon's pentachaeta on November 14, 2006. (USFWS 2006). The designation includes over 3,000 acres of Ventura and Los Angeles Counties. The DEIR states that the Proposed Project is located near, but outside of Subunit 1C of the Simi Valley Critical Habitat. According to Exhibit 3, of the Habitat Assessment Survey done by botanist Jeff Crain of BonTerra consulting who was hired by SCE to conduct the Habitat Assessment, the Presidential Substation location is directly adjacent to designated critical habitat of the Lyon's pentachaeta. (BonTerra(a) 7.27.10).

The DEIR states that the project will have a "Less than Significant" impact on the Lyon's pentachaeta. This assertion conflicts with the CEQA statutes. According to the CEQA Guidelines, a mandatory finding of significance is required when "the project has the potential to ... reduce the numbers or restrict the range of an endangered, rare or threatened species". (CEQA Guidelines § 15065(a)1; *see also* Pub. Res. Code § 21083). As stated above, section 15065 applies "to the contents of an EIR once it is determined an EIR must be prepared." (*Los Angeles Unified School Dist.* at 1024, fn.6). Here, as a result of the extremely close proximity between the Critical habitat of the Lyon's pentachaeta and the Proposed Project site, the project will have a significant impact on the endangered species because it will reduce its range. Due to the fact that the Proposed Project site is directly adjacent to critical habitat, the critical habitat will not be able to expand and grow and thus the Proposed Project will restrict the range of the Lyon's pentachaeta, which is a significant impact.

iii. Riverside Fairy Shrimp

The Riverside fairy shrimp is a federally listed endangered species. The USFWS published the Final Rule designating critical habitat for the Riverside fairy shrimp on April 12, 2005. (USFWS 2005). The habitat of the Riverside fairy shrimp consists of small vernal pools. (BonTerra(b) 7.27.10 at 2). The DEIR acknowledges that the Proposed Project is located within designated critical habit for the Riverside fairy shrimp. (DEIR at 4.4-19). The DEIR further states that, based on the findings of a 2010 habitat assessment survey, the Proposed Project area lacks habitat conditions for this species. (BonTerra(b) 7.27.10 at 2). According to the Habitat Assessment Survey, the assessment was done on June 3, 2010. (BonTerra(b) 7.27.10 at 1).

The rationale behind the Survey's conclusion that the Proposed Project area lacks habitat conditions for the Riverside fairy shrimp is flawed because it is based on one site visit that was conducted during the driest period of the year. It is very unlikely that a vernal pool would be present in Southern California during the dry season. Negative surveys do not mean that the site V

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does not contain the species or critical habitat, it simply means that the species and habitat were not present at the time of the survey. CEQA requires thorough environmental analysis and a habitat assessment based on one site visit is not sufficient.

The DEIR does state that the results of the Habitat Assessment Survey were corroborated by reconnaissance-level biological surveys by ESA. This is still not sufficient to support the assertion that the "Proposed Project area lacks habitat conditions for this species" because no information is given regarding the dates of these surveys or their specific findings. The CEQA Guidelines require that when a project has the potential to "substantially reduce the number or restrict the range of an endangered, rare or threatened species" the identification of effects to the species must be analyzed in depth in the EIR. (CEQA Guidelines § 15065(c)1). Therefore, the environmental review of the effects of the Proposed Project on the Riverside fairy shrimp is insufficient because it lacks the depth analysis required by CEQA.

C. Failure to Discuss Impacts to Protected and Special Status Species

i. The Golden Eagle

The Bald and Golden Eagle Protection Act, federally protects the Golden Eagle. (16 U.S.C. § 668-668c). The DEIR recognizes that foraging habitat for the Golden Eagle is located in the vicinity of the Proposed Project. (DEIR at 4.4-35). The DEIR simply states that suitable nest sites do not occur near the Proposed Project and "as a result, no direct or indirect impacts to nesting individuals are expected". The DEIR does not mention potential impacts to non-nesting Golden Eagles. The CEQA Guidelines require that when a project has the potential to "substantially reduce the number or restrict the range of an endangered, rare or threatened species" the identification of effects to the species must be analyzed in depth in the EIR. (CEQA Guidelines § 15065(c)1). The failure of the DEIR to investigate and discuss potential impacts to the foraging habits of the Golden Eagle renders the environmental review insufficient.

ii. The Swanson's Hawk

The Swanson's Hawk is listed by the California Department of Fish and Game as threatened species. (CEQA Guidelines § 670.5) The DEIR recognizes that foraging habitat for the Swanson's Hawk existed in the vicinity of the Proposed Project areas. The DEIR states that the Swanson's Hawk is "not expected to nest in the immediate area of the Proposed Project" and that the site is outside of the breeding range for Swanson's Hawk. The DEIR needs to elaborate as to what "not expected to" means, this type of unsupported conclusion violates the information disclosure requirement of CEQA. The DEIR concludes that because the Swanson's Hawk is "not expected to" nest on the Proposed Project site, no direct or indirect impacts to nesting individuals are expected. The DEIR does not mention potential impacts to non-nesting Swanson's Hawks. The CEQA Guidelines require that when a project has the potential to "substantially reduce the number or restrict the range of an endangered, rare or threatened species" the identification of effects to the species must be analyzed in depth in the EIR. (CEQA Guidelines § 15065(c)1). The failure of the DEIR to investigate and discuss potential impacts to the Swanson's Hawk generally renders the environmental review insufficient.

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iii. Silvery Legless Lizard

Table 4.4.-1 of the DEIR lists "Special-Status Species Known or with Potential to Occur in the Study Area". The table does not include the silvery legless lizard, which the California Department of Fish and Game has designated as a "species of special concern". According to the California Natural Diversity Database, the silvery legless lizard has been documented to occur in the Thousand Oaks USGS 7.5 minute quadrant. (CDFG, CNDDB). The CEQA Guidelines require that "an EIR include a description of the physical environmental conditions in the vicinity of the project ... from both a local and regional perspective". (CEQA Guidelines § 15125). The Proposed Project area is located in the Simi and Thousand Oaks USGS 7.5 minute quadrangles. (DEIR at 4.4-2). The environmental setting section of the DEIR should include a discussion of impacts to all special-status species known or with the potential to occur in both the Simi and Thousand Oaks quadrangles. Therefore, the DEIR fails to meet the requirements of section 15125 because it did not discuss potential impacts to the silvery legless lizard in the environmental setting section.

iv. San Diego Cactus Wren

The DEIR fails to discuss the potential impacts to a designated "species of special concern" which was observed on the Proposed Project site by a biologist hired to do a field survey. In Table 4.4-1, the DEIR lists "Special-Status Species Known or with Potential to Occur in the Study Area". (DEIR at 4.4-10). The table does not include the San Diego cactus wren, which the California Department of Fish and Game has designated as a "species of special concern". (CDFG 2008). According to the Results of Focused Presence/Absence Surveys for the Coastal California Gnatcatcher, "cactus wrens were consistently observed in the coastal sage scrub/coast prickly pear succulent scrub on the Preferred Substation Site". (BonTerra 9.29.10 at 5). The Survey does not specifically state which subspecies of Special Concern." (BonTerra 9.29.10 at 5).

Due to the fact that the San Diego cactus wren is the only subspecies of cactus wren that the CDFG has designated as a "species of special concern", it can be assumed that the cactus wren referred to in the Gnatcatcher Survey is the San Diego cactus wren. The CEQA Guidelines require that "an EIR include a description of the physical environmental conditions in the vicinity of the project … from both a local and regional perspective". (CEQA Guidelines § 15125). A biologist that conducted field surveys of the Proposed Project site identified multiple cactus wrens on the site and included this information in their report which is referenced in the DEIR. (BonTerra 9.29.10 at 5). The environmental setting section of the DEIR should include a discussion of impacts to all special-status species known or with the potential to occur on the Proposed Project site. Therefore, the DEIR fails to meet the requirements of section 15125 because it failed to discuss a special-status species known to occur on the Proposed Project site and it did not reference the potential impacts to the San Diego cactus wren in the environmental setting section.

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IV.AIR QUALITY

A. The DEIR Fails to Properly Mitigate Significant Air Quality Impacts

The Proposed Project will result in significant environmental impacts in regards to air quality. Specifically, reactive organic compounds (ROC) and nitrogen oxides (NO_x), ozone precursors, created by the project will exceed the CEQA thresholds of significance, which the Ventura County Air Pollution Control District (VCAPCD) has also adopted. Daily exhaust emissions produced by the construction of the Proposed Project are estimated at 28.8 pounds per day of ROC and 252.9 pounds per day of NO_x. (DEIR at 4.3-12). The VCAPD has adopted the Ventura County Air Quality Assessment Guidelines, which state that construction-related emissions should be mitigated if estimates of ROC and/or NO_x emissions exceed 25 pounds per day. (VCAPCD, 2003).

The DEIR suggests the adoption of Mitigation Measure 4.3-1, which requires a 20% reduction in construction-related NO_x, and ROC emissions, which would reduce NO_x emissions to 202 pounds per day and ROC emissions to 23 pounds per day. (DEIR at 4.3-13). Accordingly, NO_x emissions would still greatly exceed to threshold set by the VCAPCD and would result in a significant environmental impact. The CEQA Guidelines require that "an EIR describe feasible measures which could minimize significant adverse impacts". (CEQA Guidelines § 15126.4(a)1). Mitigation Measure 4.3-1 does not do enough to reduce NO_x emissions and thus additional measures should be suggested to minimize this significant environmental impact. If there are not other mitigation measures that could feasibly be adopted to reduce NO_x emissions to a less than significant level, then the DEIR must explain why the necessary reduction is not feasible.

B. The Analysis of the Effects of Mitigation Measure 4.3-2 is Inadequate

The DEIR identifies Impact 4.3-2, "Project construction activities would generate fugitive dust emissions of criteria pollutants that could contribute substantially to an existing or projected air quality violation". (DEIR at 4.3-13). The estimated peak day construction-related fugitive dust emissions produced by the Proposed Project would be substantial, 255 pounds per day of PM₁₀ and 28 pounds per day of PM_{2.5}. (DEIR at 4.3-14). The DEIR recommends Mitigation Measure 4.3-2 to address this significant effect and asserts that the implementation of this measure would reduce the impact to less than significant. According to the CEQA Guidelines, when discussing the environmental effects of a project, an EIR must include "a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences". (CEQA Guidelines § 15151). Applying this standard, the DEIR must substantiate its assertion that the implementation of Mitigation Measure 4.3-2 will reduce the environmental impact to less than significant. The DEIR fails to provide data to corroborate its conclusion, which renders the analysis inadequate under CEQA.

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C. The DEIR Incorrectly Analyzes the Air Quality Impacts Produced by System Alternative B

The Air Quality impacts that would be produced by the construction of System Alternative B would be substantially less than the impacts that would result for the construction of the Proposed Project. The DEIR states that "it is anticipated that peak day construction emissions under the System Alternative B would be similar to the peak daily emissions estimated for the proposed Presidential substation". (DEIR at 4.3-21). This assertion is unfound and unlikely because System Alternative B only requires the replacement of three existing transformers while the Proposed Project involves the construction of a new substation, replacement of existing distribution and subtransmission poles, installation of underground subtransmission facilities and construction of related distribution components. (DEIR at ES-3). CEQA mandates that an EIR "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project". (CEQA Guidelines § 15126.6(d)). The DEIR fails to abide by this mandate and down plays the fact that System Alternative B would result in substantially less air quality impacts than the Proposed Project.

V. AESTHETICS

The location of the project will cause a significant impact on the aesthetic character of the area. Any substantial negative effect of a project on view and other features of beauty could constitute a significant environmental impact under CEQA. (*See Quail Botanical Gardens Foundation, Inc. v. City of Encinitas*, (1994), 29 Cal.App.4th 1597, 1604). Personal observations on nontechnical issues such as aesthetics and affects upon a viewshed can constitute substantial evidence that there will be a significant impact under CEQA. (*Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, (2004), 116 Cal. App. 4th 396, 402). These comments emphasize that the project would create a significant detrimental effect on the aesthetic quality of the area.

The Project is a recognized significant impact to aesthetic resources because, in part, of the Project's significant impacts to Olsen Road, a City of Thousand Oaks designated Scenic Highway. (DEIR at ES-21, 4.1-11, 4.1-12, 4.1-14). The DEIR acknowledges that numerous roads that are impacted by the project in Ventura County, and the cities of Thousand Oaks and Simi Valley are designated designated and eligible Scenic Roadways and Scenic Highways. (DEIR at 4.1-19). Unfortunately the EIR fails to disclose the EIR's other aesthetic impacts such as numerous conflicts with applicable local regulations related to aesthetics, and other aesthetic impacts.

The Project would have a permanent and irrevocable impact on viewsheds from numerous natural areas, equestrian centers, community farms, and residential communities. The DEIR fails to acknowledge the significant and negative impacts that the new powerlines would pose for those areas or propose mitigation measure to address those impacts. The DEIR's failure to adequately analyze or disclose those impacts runs contrary to CEQA. A15-24

VI. CULTURAL RESOURCES

The DEIR fails to adequately disclose and analyze impacts to cultural resources. As the DEIR notes the "Proposed Project is located in an area of elevated sensitivity for prehistoric archaeological resources, as evidenced by the large number of prehistoric sites in close proximity to the Proposed Project (47 sites within 1 mile)." (DEIR at 4.5-20). The Project threatens several sites of archeological and historical significance that have been found to be eligible for the California Register. (DEIR at 4.5-19 to 4.5-21).

Given the cultural sensitivity of the area the DEIR fails to conduct an adequate analysis under CEQA. CEQA requires that a lead agency must "use its best efforts to find out and disclose all that it reasonably can." (Guidelines § 15144). The DEIR recognizes that cultural resources review may have been deficient because the cultural resources surveys were "subject to poor ground visibility" that was below 25%. (DEIR at 4.5-20). Thus, much of the DEIR's disclosure and analysis of the potential impacts undercounts the likely impacts posed by the Proposed Project's significant ground disturbing activity. The DEIR's failure to fully analyze the potentially significant cultural resources by conducting a survey that omits over 75% of the ground survey renders the disclosure and analysis of impacts to cultural resources deficient.

The DEIR further recognizes that the Proposed Project's impacts to two sites eligible for the California Register are not fully analyzed because the mitigation and avoidance of those areas will be addressed by future mitigation. (DEIR at 4.5-19). The DEIR fails to disclose what the impacts will be and to what degree those impacts will occur. Indeed the DEIR fails to disclose how and where those impacts will impact those culturally sensitive sites, or disclose avoidance measures for those impacts.

The DEIR fails to disclose the Project's inconsistency with local policies regarding cultural resources. CEQA requires a lead agency to analyze whether a project would "[c]onflict with any applicable land use plan, policy, or regulation... adopted for the purpose of avoiding or mitigating an environmental effect." (Guidelines App. G. § X(b)). Ventura County Policy 1.8.2 (2) requires the following:

Discretionary development shall be designed or re-designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical or paleontological consultants, depending on the type of resource in question.

(DEIR 4.5-13). The DEIR fails to describe how the project has been re-designed to avoid potential impacts or how the maximum recoverable data will be extracted. The DEIR also fails to describe how the determinations of significance and mitigation were made in consultation with recognized local Native American groups. The DEIR's failure to comply with existing ordinances or describe how the project conflicts with those ordinances runs contrary to CEQA.

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(CEQA Guidelines App. G. § X(b)). Similarly the DEIR fails to adequately describe the Project's conflicts with the City of Thousand Oaks Policy CO-34 in providing deed restrictions for archeological sites as open space, or how the project achieves the coordination requirements of the City of Thousand Oaks Policy CO-35.

VII. NOISE

The DEIR fails to adequately disclose and analyze the Project's impacts on noise. One of the fundamental flaws of the Project's analysis of noise is the failure to adequately describe the hours and duration of construction activities that pose an admittedly significant impact. (DEIR at 4.11-15). The DEIR states repeatedly that "there is a possibility that construction would be required during different hours or days" and may be conducted during evening hours when noise sensitivity limits are lower. (DEIR at 4.11-15). The DEIR fails to properly disclose what those potential impacts would be, but instead defers disclosure to a separate phase where SCE "has committed to obtaining variances from local noise ordinances, as necessary." (DEIR at 4.11-15). Obtaining future variances for undisclosed project impacts fails to provide the necessary disclosure and analysis of the Project required by CEQA.

The DEIR's failure to commit to defined hours and durations of construction to reduce the Project's admittedly significant noise impacts runs contrary to CEQA's substantive requirements. CEQA requires the lead agency to adopt all feasible mitigation measures or alternatives to reduce the Project's significant impacts. (Pub. Res. Code §§ 21002, 21002.1(b)). Eliminating evening construction, or noise within or adjacent to residential areas would reduce the impacts on sensitive receptors and residential communities. The DEIR avoids feasible mitigation measures to limit construction noise impacts to the hours of 9 a.m. to 5 p.m. when those impacts would be less significant for sensitive receptors and residential areas. The DEIR also fails to commit to other time and place restrictions that could reduce the significant noise impacts. There is no demonstration that those mitigation measures would be infeasible or impractical to implement. The DEIR's failure to adopt those feasible mitigation measures violates CEQA. The DEIR admits that its mitigation measures are deficient, "it not possible to firmly substantiate that implementation of Mitigation Measures 4.11-1a and 4.11-1b would achieve noise reductions of more than 5 dBA." (DEIR 4.11-15). This meager reduction in mitigation measures barely achieves any reductions. TheD EIR cannot point to such minor reductions and claim that all feasible mitigation measures have been adopted.

VIII. GREENHOUSE GAS EMISSIONS

A. The DEIR Fails to Adequately Analyze the Proposed Project's Greenhouse Gas Emissions Cumulative Impacts

An EIR is required to contain a discussion of cumulative impacts, "an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts". (CEQA Guidelines §15130(a)1). The DEIR states that the Proposed Project-specific incremental impact on greenhouse gas (GHG) emissions would not be cumulatively considerable. (DEIR at 6-10). This is an unfounded assertion which violates the

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following CEQA mandate, "A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant". (CEQA Guidelines § 15130(a)2). In making this assertion, the DEIR also fails to account for the GHG emissions produced by the facility generating the electrical power that will flow through the Presidential Substation, which is clearly a cumulative impact according to the definition given in section 15130(a)1. Therefore, the DEIR's discussion of GHG cumulative impacts should be revised to account for the GHG emissions produced by the electrical power generation facility that would supply the Proposed Project. The revised EIR should also contain facts and analysis supporting the conclusion that the Proposed Project's impact on GHG emission would not be cumulatively considerable, per the mandate in section 15130(a)2 of the CEQA Guidelines.

B. The DEIR Fails to Account for Climate Change when Analyzing Impacts from the Proposed Project on Biological Resources

Climate change has impacted a range of ecosystem processes leading to large-scale shifts in the ranges of species and the timing of the seasons and animal migration. (USGCRP 2009). Threats to ecosystems and their species from fires and disease pathogens have increased and will likely continue to increase. (USGCRP 2009). For areas like the arid southwest (including the project area) deserts and drylands are likely to become hotter and drier, feeding a self reinforcing cycle of invasive species, drought, and wildfire that will transform ecosystems. (USGCRP 2009).

Climate change is a leading threat to California and the world's biological diversity. Climate change will become one of the major drivers of extinction in the 21st century. (IUCN 2009; Mayhew 2007). Under a relatively high emissions scenario, 35%, under a medium emissions scenario 24%, and under a relatively low emissions scenario, 18% of the world's species studied would be committed to extinction by the year 2050. (Thomas 2004). The Intergovernmental Panel on Climate Change, the world's pre-eminent authority on global climate change, projected that approximately 20-30% of plant and animal species are likely to be at increased risk of extinction. (IPCC 2007).

i. The Proposed Project's Significance as a Wildlife Corridor

Climate change will elevate the importance of wildlife linkages, such as the Proposed Project Area, to connect species populations or provide migratory corridors for wildlife species impacted by changing ecosystem conditions. Wildlife corridors or wildlife linkages buffer the negative impacts of climate change on wildlife through facilitating migration and genetic flow. (Servheen 2007, Halpin 1997). The Proposed Project area serves as a crucial coast to inland connection for many species including the mountain lion, mule deer, acorn woodpecker and the Chalcedon checkerspot butterfly. (South Coast Wildlands(a)). The Proposed Project is part of one of the few remaining wildlife linkages connecting the Santa Monica Mountains to the Simi Hills and Santa Susanna Mountains. (South Coast Wildlands(a)). Thus, the importance of the Proposed Project site as a wildlife linkage must be analyzed in the context of its elevated importance to provide for wildlife migration due to climate change. A15-30

ii. Climate Change Impacts on Listed Species and their Critical Habitat

The DEIR fails to address the impacts the Proposed Project will have on threatened species in light of climate change. As discussed above, the Proposed Project area contains suitable habitat for five federal or state listed endangered or threatened species, the coastal California gnatcatcher, Lyon's pentachaeta, Riverside fairy shrimp, Golden Eagle and Swanson's Hawk. Climate change will increase the likelihood of plant and wildlife diseases because historic cold weather temperatures that in the past have killed pathogens and vectors carrying parasites will no longer occur. (Harvell et al. 2002). Therefore, warmer temperatures will increase pathogen and parasite mortality and increase the likelihood that plants and wildlife will be exposed to and will contract disease.

Another negative impact that climate change will have on threatened species is that it will increase the likelihood of wildfires which are a serious threat facing southern California. It is estimated that climate change could result in a 55 percent increase in the expected risk of wildfires in California. (Cayan et al. 2007). Wildfires pose a significant risk to the threatened plant and wildlife species for which the Proposed Project site is suitable habitat. An increase in wildfires will also increase the importance of the Proposed Project area as a wildlife corridor. If wildfires become more prevalent as predicted, wildlife will need access to the Proposed Project site in order to reach safety.

It is clear that some impacts from climate change are inevitable, therefore the analysis of the Proposed Project's impacts on biological resources in the DEIR should also account for the additional threats climate change poses to species. Unfortunately, the DEIR fails to mention and explore the effects of climate change on species impacted by the Proposed Project. The DEIR's discussion of biological resources fails to adequately analyze global warming or climate change, and fails to include a substantive analysis of the impacts of climate change on the species that will be negatively impacted by the Proposed Project. This omission falls short of the information disclosure requirements under CEQA in considering the environmental effects of the permitted harm, harassment, and destruction of imperiled wildlife and wildlife habitat.

IX. LAND USE AND PLANNING

The DEIR fails to adequately disclose and analyze the Project's impacts and conflicts with applicable land use laws. CEQA requires a lead agency to analyze whether a project would "[c]onflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project... adopted for the purpose of avoiding or mitigating an environmental effect." (Guidelines App. G. \S X(b)). Instead of addressing those conflicts and impacts the DEIR disregards those requirements or improperly dismisses the conflicts.

The Ventura County General Plan ("County General Plan") includes many policies and goals that require the minimization of the negative environmental impacts of transmission lines, including requiring mitigation or alternative such as undergrounding to reduce those impacts. (Ventura County General Plan Policy 4.5.2, 2-3; DEIR at 4.1-31). The County General Plan also requires preserving and retaining open space resources that would be negatively impacted by the

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Proposed Project. (Ventura County General Plan Open Space Goal 5, (1) & (3); DEIR at 4.1-31). The Proposed Project conflicts with these policies and goals and hinders the A15-33 implementation of the County General Plan, yet the DEIR fails to disclose and analyze these impacts. The City of Thousand Oaks General Plan discusses the negative impacts resulting from the Proposed Project. Specifically, the Thousand Oaks General Plan emphasizes the following: the worst offenders [of visual pollution] are utility poles stalking right thorough the centers of communities and out into the rural areas. No real improvement in the appearance of the environment can be expected unless such utilities are relocated underground and the poles removed. (DEIR 4.1-32). The Thousand Oaks General Plan also emphasizes that open space areas for City should be preserved "in an essentially undisturbed state", their should be cooperation between A15-34 open space managers and utility companies, and when public services or utility facilities must be located in a natural open space area that they "shall be located and designed to minimize impacts." (Thousand Oaks General Plan Policy OS-1, OS-25, OS-30; DEIR at 4.1-32). One important mechanism to reduce those impacts is to assure the coordination of a program for undergrounding utility lines to maintain scenic corridors. (City of Thousand Oaks General Plan Scenic Highways Policy 9; DEIR at 4.1-33). The City of Thousand Oaks also established development standards to protect ridgelines. (Thousand Oaks Zoning Ordinance §9-4.3502, DEIR at 4.1-34). The zoning ordinance prohibits structures, like the Proposed Project, from being silhouetted against the skyline above ridgelines that would be affected by the Project. (Thousand Oaks Zoning Ordinance §9-4.3502, DEIR 4.1-34). The City of Simi Valley General Plan also has development standards and policies that require the Proposed Project to be designed to blend into the environment, be placed underground, and produce the least amount of visual and environmental impact on the community. (Simi Valley General Plan Implementation Measure VII-T, Policy III-1.3, Policy III-1.3.4; DEIR at 4.1-35). Even where the DEIR recognizes that there will be conflicts with existing land use A15-35 regulations it attempts to mask those conflicts. The DEIR recognizes that the "construction, operation and maintenance of the Substation would conflict with the City of Thousand Oaks's Protected Ridgeline Overlay Zone." (DEIR at 4.10-16). However, the DEIR attempts to mask

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this recognized conflict by asserting there are no land use conflicts. (DEIR at ES-35; DEIR § 4.10). The DEIR's claim that the CPUC's sole and exclusive jurisdiction over the siting and design of the Project ignores that the Proposed Project will be constructed and operated within the jurisdiction of three local agencies that have passed regulations to limit the impacts from project's like the one analyzed in the DEIR. The attempt to avoid disclosing those impacts runs

contrary to the information disclosure requirements of CEQA.

The DEIR further fails to describe the Proposed Project's conflict and impacts with easements, franchise agreements, or encroachment permits. The DEIR's failure to analyze and disclose those impacts fails to provide the public and decision makers with the necessary information to analyze the Proposed Project's potential impacts, or the exact details of the Project description itself.

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X. GROWTH-INDUCING EFFECTS

The DEIR fails to adequately disclose and analyze the Project's growth-inducing impacts. CEQA requires an EIR to address ways in which a project can directly or indirectly foster population or economic growth. (CEQA Guidelines §§ 15126, 15126.2(d)). The Project proposes to add an additional substation, electrical transmission lines, and capacity for increased residential or commercial growth. The DEIR incorrectly assumes that this additional infrastructure will not be growth-inducing because it will ostensibly meet existing electrical needs. However, this assertion is based upon an incomplete disclosure of the actual electrical need within the ENA and, as the true electrical demand discloses, the assertion that the Proposed Project would "accommodate existing and planned electrical load growth, rather than to induce growth" has no basis in reality. (DEIR at 6-2).

The DEIR's claims that Project would not be growth-inducing because "the availability of electrical capacity by itself normally [does not] ensure or encourage growth within a particular area" ignores CEQA's requirements that an EIR address indirect growth inducing impacts. (DEIR at 6-2). The CEQA guidelines themselves point to other infrastructure requirements, such as wastewater treatment plants, to illustrate that a Project need not necessarily cause the direct growth-inducing impacts but could simply "remove obstacles to population growth" such a limitations on electrical capability in an area. (CEQA Guidelines § 15126.2(d)). The DEIR's attempts to avoid analyzing and disclosing the Project's potential to allow for increased electrical use in commercial, industrial, and residential use cannot simply be dismissed in a conclusory fashion.

XI. THE DEIR FAILS TO ADEQUATELY DISCLOSE AND ANALYZE MITIGATION MEASURES

A. The DEIR Improperly Defers Mitigation Measures for the Proposed Project

Instead of fully disclosing, analyzing, and mitigating many of the Proposed Project's significant impacts the DEIR improperly defers the formulation and analysis of mitigation. "[F]uture mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal. App. 4th 70, 92). CEQA prohibits deferring mitigation to a later time unless it is demonstrated that the lead agency has undertaken a complete analysis of the impact, mitigation measures are outlined early in the planning process, and mitigation measures can achieve specific performance standards. (*Richmond*, 184 Cal.App.4th at 95; CEQA Guidelines § 15126.4(a)(1)(B)). Unfortunately the DEIR employs a broad range of

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vaguely defined mechanisms for analysis and mitigation that do not provide the proper detail or Λ A15-38 commitments as required by CEQA.

Mitigation Measure 4.4-2b improperly defers mitigation for impacts to biological resources such as the coastal California gnatcatcher—a species protected under the Act—through a deferred coastal sage scrub mitigation plan. "A qualified ecologist shall prepare a restoration and mitigation plan in coordination with CDFG" to mitigate temporary impacts to coastal sage scrub habitat. (DEIR at ES-25, 4.4-36, 4.4-43). The mitigation measures involved in that plan are only vaguely defined so that the public and decision makers cannot analyze their effectiveness or be informed of what such "measures to ensure long-term sustainability" would consist of.² This mitigation measure also fails to provide performance standards and instead defers the formulation of "success and performance criteria." (DEIR at ES-25, 4.4-36, 4.4-43).

Mitigation Measure 4.5-1 improperly defers the disclosure and analysis of impacts to cultural resources. The DEIR acknowledges potentially significant impacts to cultural resources through the direct and ongoing impacts to culturally sensitive sites. (*E.g.* DEIR at 4.5-19). Instead of fully addressing those impacts the DEIR proposes the development of a Cultural Resources Treatment and Discovery Plan. (DEIR at ES-27). The plan calls for, *inter alia*, the future formulation of mitigation related to data recovery, establishing Environmentally Sensitive Areas, whether the project should be redesigned, and determinations of future avoidance. (*Id.*) Similarly, the DEIR proposes the future formulation of the Paleontological Mitigation Plan that "shall identify paleontologically sensitive formations within the project area, and shall address the locations of and procedures for paleontological resources monitoring, including the identification of specific paleontological monitoring locations." (DEIR at ES-29). Only then will the full impacts and mitigation be disclosed and analyzed. There is no way for the public or decision makers to know the true impacts to culturally significant resources until after the DEIR is issued and the plans are developed.

To address the Proposed Project's admittedly significant impacts noise the DEIR proposes a deferred mitigation plan and fails to adequately disclose and analyze the Project's noise impacts. Mitigation Measure 4.11-1a requires SCE and/or its contractors to develop a Construction Noise Reduction Plan. (DEIR at ES-35). The noise reduction plan calls for methods for reporting complaints, mufflers on construction equipment, physical separation (as far as practicable), and undefined noise barriers. (DEIR at ES-35 to ES-36). There are inadequate commitments to performance standards, analysis of what types of distance for physical separation will be required, or disclosure of how barriers will address the impacts to nearby sensitive receptors. Additionally, there is an inadequate analysis as to whether nighttime construction will occur and what level of impact that will have on nearby sensitive receptors. (DEIR at ES-36). The mitigation measures do not properly address mitigation for the noise impacts for human uses, but also the impacts to wildlife. Finally, the Traffic Management Plan subject to approval of the appropriate state agency and/or local government(s) is similarly

² DEIR at ES-25, 4.4-36, 4.4-43. ("The plan shall include a full description of microhabitat conditions necessary for each affected species, seed germination and planting requirements, restoration techniques for temporarily disturbed occurrences, assessments of potential transplant and enhancement sites, success and performance criteria, and monitoring requirements, as well as measures to ensure long-term sustainability.")

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deficient in its means to disclose and analyze impacts due to construction and operations and the mitigation to address those impacts. (DEIR at ES-37).

XII. ALTERNATIVES

An EIR is required to identify a reasonable range of environmentally superior alternatives. (CEQA Guidelines § 15126.6(a)). The lead agency must "set forth facts and meaningful analysis of these alternatives rather than just the agency's bare conclusions or opinions." (*Preservation Action Council v. City of San Jose*, (2006) 141 Cal. App. 4th 1336, 1353). Unfortunately, the DEIR fails to comply with CEQA's requirements to adequately analyze alternatives because it simply repeats the Project proponent's bare conclusions regarding the electrical demand in the ENA without any facts or meaningful analysis. (DEIR at ES-3, ES-5). It then uses those hypothetical project objectives to improperly eliminate alternatives from analysis. (See e.g.DEIR at ES-8). The discussion of alternatives in the DEIR is incomplete because if fails to adequately consider a reasonable range of alternatives and the analysis of the alternatives falls well short of CEQA's standards.

A. The DEIR Fails to Consider a Reasonable Range of Alternatives

i. System Alternative A and the Non-Wires – Demand Management Conservation Alternative were erroneously eliminated from DEIR analysis

The DEIR lists two environmentally superior alternatives, System Alternative A and the Non-Wires- Demand Management Conservation alternative (Demand Management Conservation), which were both eliminated from DEIR consideration "due to a failure to meet the most basic project objectives". (DEIR at 3-14). The CEQA Guidelines state:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

(14 CCR § 15126.6(a)).

Both System Alternative A and the Demand Management Conservation alternative are "reasonable" alternatives according to the criteria explained in section 15126.6(a) and they should have been described and analyzed in more detail in the DEIR. The above-mentioned alternatives were eliminated for their failure to meet the project objectives of increased system capacity. Due to the fact that the project objectives are based on incorrect demand capacity needs, these alternatives should be reevaluated in light of projected capacity needs that include the years 2009 and 2010 and that reflect the decline in energy use within the ENA.

a. System Alternative A

As described in the comments submitted by David Marcus, the DEIR improperly dismisses System Alternative A, based on the improper and unsupported forecasts provided by SCE. System Alternative A could meet the electrical demand, and safety and reliability objectives in the ENA by simply avoiding load rolling into the ENA and adding additional standard sized transformers to existing substations. Additionally, the DEIR ignores the option of adding more standard-sized transformers outside of the ENA and using them to meet ENA loads through load-rolling. System Alternative A would meet the project objectives while avoiding the Project's significant environmental impacts and should be adopted.

b. Demand Management Conservation Alternative incorrectly deemed "infeasible"

The DEIR also eliminates the Non-Wires alternative for its failure to meet the "Feasibility Criteria" laid out in the DEIR. (DEIR at 3-13). Under this proposed alternative, SCE would use programs such as rebates on energy-efficient appliances, incentives for customer-owned solar generation, a metering system that allows SCE customers with smart thermostats and appliances to automatically respond during critical peak pricing and reliability events and other measures to reduce energy use within the ENA to a level that the current system can sustain well into the future. The DEIR evaluated the feasibility of the alternatives in terms of their legal, regulatory and technical feasibility and eliminated any alternatives that were deemed infeasible in regards to any of the three categories. (DEIR at 3-6). The Non-Wires alternative was deemed infeasible because, energy conservation programs "are not feasible on a scale that would be suitable to replace the Proposed Project within a reasonable period of time". (DEIR at 3-13).

The above assertion is conclusionary and lacks evidentiary support, which violates the CEQA Guidelines requirement that an EIR "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project". (CEQA Guidelines §15126(e)3(c)). The court in *Laurel Heights Improvement Assn. v. Regents of University of California*, held that the EIR was required to contain detail sufficient to enable those who did not participate in its preparation to understand and to meaningfully consider the alternatives to the Proposed Project. ((1988) 47 Cal. 3d 376, 404-405). The DEIR must include facts and figures regarding the capacity of the Non-Wires alternative to reduce energy use in the ENA to levels that the current system can support in the future. Also, in light of the actual energy usage for the ENA in 2009 and 2010, the Non-Wires alternative should be reevaluated in regards to the reduced energy demand for the area. Considering the current operating capacity of the system and the actual peak demand for the last two years, the Non-Wires alternative is feasible and meets the basic project objectives, thus it should be fully evaluated in the DEIR.

c. <u>Non-Wires Alternative – Renewable or Conventional/Distributed Generation</u> <u>Energy Resources, incomplete alternative analysis</u>

The DEIR fails to fully discuss potential renewable or distributed generation options that could be employed to meet the project objectives. Also, the DEIR does not evaluate the Non-

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Wires Alternative – Renewable or Conventional/Distributed Generation (Renewable or Distributed Generation) in the context of the actual peak demand usage for 2009 and 2010 which shows that energy use is trending downward. The CEQA Guidelines require an EIR to "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project". (CEQA Guidelines § 15126(e)(3)(c)). The discussion within the DEIR of the Renewable or Distributed Generation alternative falls far short of this mandate because it only gives a very short overview of each type of generation scheme and only provides a "Rationale for Elimination" regarding distributed generation. (DEIR at 3-38-39). Distributed energy through such means as photovoltaic energy can provide substantial benefits to the energy generation and can be used to reduce the demand on substations. (Hoff). The DEIR should reevaluate this alternative in light of the actual peak demand for 2009 and 2010. Furthermore, the DEIR should include actual computations regarding potential energy generation available from renewable and/or distributed sources.

Both of the Non-Wires Alternatives, Demand Management Conservation and Renewable or Distributed Generation, should be evaluated in conjunction with each other. The DEIR deems both alternatives as infeasible individually but fails to evaluate if the two non-wires alternatives would meet the feasibility criteria if used in conjunction with each other. The CEQA Guidelines defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors". (CEQA Guidelines § 15364). Applying this standard, it is certainly feasible that both of the Non-Wires alternatives could be used in conjunction with each other because none of the §15364 limiting factors would render either option infeasible. Both of the Non-Wires alternatives were eliminated from full EIR Evaluation because of their purported inability to provide adequate energy supply, this issue could easily be remedied if the two alternatives were evaluated together. Therefore, the DEIR should reconsider if elimination of the Non-Wires alternatives as feasible options and should conduct further research and analysis on the potential for using the two alternatives in conjunction with one another.

B. The DEIR Incorrectly and Inadequately Analyzes the No Project Alternative

The discussion of the "No Project Alternative" within the DEIR is insufficient because it fails fully explore the potential feasibility of the alternative. The DEIR simply assumes that System Alternative A would have to be implemented if the Proposed Project was not built and because that alternative would fail to meet the basic project objectives, "no analysis was carried forward". (DEIR at 3-26). The CEQA Guidelines require that the "no project alternative" be evaluate along with its impact. (CEQA Guidelines § 15126.6(e)1). The purpose of describing and analyzing a "no project" alternative is "to allow decision makers to compare the impact of approving the Proposed Project with the impacts of not approving the Proposed Project". (CEQA Guidelines § 15126.6(e)1). The analysis of the "No Project Alternative" within the DEIR is only four sentences in total. The DEIR fails to give sufficient detail regarding the "no project" alternative to enable decision makers to form an educated and thoughtful opinion regarding the potential; impacts of the Proposed Project as compared to the effects the "No Project Alternative" would have on the environment and the community.

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The discussion of the "No-Project Alternative" fails to account for the fact that energy usage is going down as evidenced by the actual peak demand for the ENA for 2009 and 2010. The CEQA Guidelines require that the lead agency analyze the impacts of the "no project" alternative by projecting what would "reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services". (CEQA Guidelines § 15126.6(e)2). The DEIR fails to abide by this mandate because it does not address the possibility that the Proposed Project may not be necessary which is reasonably expected to occur because energy consumption in the ENA is decreasing and is drastically less than was originally projected. The DEIR must fully analyze the potential effects of the "no-project" alternative and cannot simply dismiss it as infeasible without further analysis.

C. System Alternative B is the Environmental Superior Alternative

The DEIR identifies System Alternative B as the Environmentally Superior Alternative. (DEIR at ES-1). Under this alternative, the Royal, Thousand Oaks, and Potrero Substations would be upgraded. (DEIR at 3-24). This upgrade would consist of replacing the existing 16.8 MVA transformers with lager ones, approximately 25-30 MVA, which would be inconsistent with standard SCE transformer sizing. (DEIR at 3-24). System Alternative B would not require the construction of a substation and distribution lines and thus would result in much less substantial environmental impacts than the Proposed Project and the other alternatives. The DEIR admits that System Alternative B would not result in any significant impacts and that it meets feasibility criteria as well as most of the project objectives. (DEIR at 3-25). According to the DEIR, the alternative would not provide the same amount of operational flexibility and reliability as the Proposed Project.

The DEIR recognizes that the Proposed Project will have significant environmental effects in regards to aesthetics, air quality, and noise. (DEIR at 5-4). As discussed above, the Proposed Project will also have significant environmental effects on the biological resources in the area. The California Court of Appeal has held that in order to approve a project that would result in a significant environmental impact, the lead agency is "required to make findings identifying (1) the specific consideration that make infeasible the environmental harm". (*Preservation Action Council v. City of San Jose,* (2006) 141 Cal. App. 4th 1336, 1353). In the Administrative Law Judge's Ruling Setting Second Prehearing Conference, on September 22, 2011, Administrative Law Judge Yacknin acknowledged this requirement: "the Commission may not approve a project other than "System Alternative B" unless the project alternative is infeasible and only upon a finding that overriding considerations merit approval of a project alternative is Second Prehearing Conference, September 22, 2011).

The CPUC may not approve any of the other alternatives including the Proposed Project because the DEIR expressly states that System Alternative B "meets feasibility criteria" and "meets most project objectives" and is thus feasible. (DEIR at 3-9). Further, because System Alternative B is feasible, the applicable statute bars the approval of the Proposed Project, "it is

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the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives ... which would substantially lessen the significant environmental effects of such projects". (Cal Pub. Res. Code § 21002). The fact that System Alternative B does not meet all of the project objectives does not render it infeasible. The DEIR's vague statement that System Alternative B results in "reduced operational flexibility and reliability compared to the Proposed Project" does not provide an adequate basis for rejecting the environmentally superior alternative. (DEIR ES-19). According to the DEIR, the only way System Alternative B fails to fully meet the project objectives, is that it would provide less operational flexibility and reliability and reliability than the Proposed Project. (DEIR at 3-25). System Alternative B is the only project that may be approved.

D. The DEIR Fails to Adequately Analyze Alternatives

The DEIR failed to adequately identify the significant impacts of the project, as discussed above. The DEIR also fails to adequately disclose and analyze the Project objectives, and the hypothetical electrical need within the ENA that improperly constrains the alternatives analysis. This inadequacy creates an insufficient alternative analysis because the DEIR fails to recognize the significant effects the project will have on biological resources in the area and on air quality. Thus, the DEIR does not focus on finding alternatives that would reduce these impacts. The significant impacts to aesthetics, air quality, and noise that the DEIR does recognize could also be lessened by alternatives that reduce the significant effects to biological resources and air quality caused by the project.

The CEQA Guidelines require the selection of alternatives that would avoid or substantially lessen the significant effects of the project. (CEQA Guidelines § 15126.6(a)). Due to the fact that the DEIR ignores some of its significant impacts, it failed to select alternatives to reduce those impacts. To the extent any of the alternatives proposed in the DEIR can reduce the significant impacts of the project, no analysis was provided because of the fundamental inadequacies of the DEIR. The California Supreme Court has described the discussion of mitigation and alternatives as "the core of an EIR". *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 C3d 553, 564. Therefore, the failure of the DEIR to adequately analyze alternatives in light of the Proposed Project's significant impacts is a substantial defect that must be remedied.

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V. CONCLUSION

Thank you for your attention to these comments. We look forward to working with the CPUC to assure that the DEIR conforms to the requirements of CEQA to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided through the adoption of an environmentally superior alternative to the Proposed Project. Should you have any questions feel free to contact Jonathan Evans at the contact information listed above.

Best regards,

brothen Evans

Jonathan Evans Staff Attorney

Elise Torres Law Clerk

cc: CPUC docket office Confidential documents submitted under seal

Exhibit 1- Figure 1.2 Electrical Needs Area Substations Capacity and Peak Demand [filed under seal].

Exhibit 2- David Marcus, Comments on the Presidential Substation DEIR, November 15, 2011 [redacted & confidential references filed under seal].

Exhibit 3- ENA load and resource forecasts from SCE (all on 1-in-10 basis) [filed under seal].

REFERENCES

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Exhibit 1

Figure 1.2 Electrical Needs Area Substations Capacity and Peak Demand [Filed under seal]

Exhibit 2

David Marcus, Comments on the Presidential Substation DEIR, November 15, 2011 [redacted & confidential references filed under seal]

Comments on the Presidential Substation DEIR

David Marcus

November 15, 2011

I. Introduction and summary

A. Introduction

The Draft Environmental Impact Report ("DEIR") for the Presidential Substation Project ("Presidential") of the Southern California Edison Company ("SCE") was published in September 2011. It concludes that the Environmentally Superior Alternative ("ESA") is System Alternative B,¹ an alternative under which SCE would add new transformers at existing substations rather than develop the proposed new Presidential substation,² is environmentally preferable to the proposed new substation and associated transmission lines.

In an Assigned Commissioner's Scoping Memo and Ruling issued November 8, 2011, Commissioner Florio ruled that the feasibility of project alternatives was one of the seven issues to be decided by the Commission in this case.³ The comments below address both the nature of various alternatives, including the ESA, and their feasibility.

B. Summary

The DEIR does not describe the ESA very clearly. It doesn't say exactly what they ESA would consist of, other than an unknown number of 25-30 MVA (base rating) transformers at three existing substations, and it doesn't say when those transformers would need to be installed. In my comments below, I describe the limited scope that would be required for the ESA, and thus conclude that it appears to be fully feasible.

Having seen that the required scope of new resources for the Presidential area is not very large, I then re-examine two alternatives that were dismissed in the DEIR process and not analyzed in the DEIR. I conclude that either of these alternatives – replacing existing transformers with SCE's standard 28 MVA nameplate size transformers or relying on demand-side measures – would meet SCE's Presidential-area 1-in-10 peak loads throughout SCE's substation planning horizon. I also point out that a smaller Presidential substation fed only from the east is an option that is electrically feasible and avoids the environmental impacts associated with transmission routes west of the Presidential site.

Finally, I point out the DEIR errs in rejecting alternatives that would merely delay and not replace the Presidential project. Such alternatives can both save ratepayers money and defer the negative environmental impacts of the proposed Presidential project.

¹ DEIR, p. 5-3.

² DEIR, pp. 3-9, 3-14, 3-24 and 3-25

³ The feasibility of project alternatives is Issue 4 in the Assigned Commissioner's Scoping Memo and Ruling of 11/8/11 (p. 3).

All of the alternatives discussed in my comments – the ESA, new standard-size 'transformers at existing substations, energy efficiency and demand response, a scaled back Presidential project, and a deferred Presidential project – would be environmentally preferable to the proposed project.⁴ They would either avoid any new transmission line construction at all, or would reduce or defer the scope of new transmission line construction from that proposed by SCE.

II. The nature and feasibility of the ESA

A. When is the ESA needed and how big should it be?

The feasibility of the ESA depends on both its timing and scope. The less that is required, and the more time available in which to do it, the more feasible the ESA becomes. When SCE first submitted its Proponents Environmental Assessment (PEA) for the Presidential project, it projected that 1-in-10 peak demands would exceed the 400 MVA load-serving capability of the "Electrical Needs Area" substations⁵ by the summer of 2011. In reality, SCE experienced degree hotter than 1-in-10 weather conditions in the summer of 2010, and yet its peak load reached only MVA,⁶ far below either its forecast or the level that its current substations can serve.⁷ On a 1-in-10 weather basis, summer 2010 peak loads in the ESA were only MW.⁸

SCE has since revised its forecasts downward. Its latest revised forecast for the "Electrical Needs Area" substations for 2010 under 1-in-10 conditions was **MVA**,⁹ which turned out to be **MVA** (15.1 percent) higher than the actual peak (adjusted for 1-in-10 temperatures) of **MVA**,¹⁰ even though the forecast was provided more than a year after the peak had occurred. For 2011, SCE projected a 1-in-10 peak demand of MVA, up **MVA** (2.1 percent) from its 2010 forecast.¹¹ But it then claims there will be increases of **MVA** (3.0 percent) in 2013 and **MVA** (8.6 percent) in 2015.¹² After 2015, SCE expects load growth to decrease sharply in the Electrical Needs Area, averaging **MVA** per year for the next five years.¹³ Confidential Table 1 shows

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⁴ The environmental superiority f alternatives vis-à-vis the proposed project is Issue 3 in the Assigned Commissioner's Scoping Memo and Ruling of 11/8/11 (p. 3).

⁵ Royal, Thousand Oaks, and Potrero, plus Presidential if built.

⁶ SCE, confidential response to CBD data request 5-7.

⁷ CBD has requested both actual and weather-adjusted actual data for the summer of 2011, but as of 10/23/11 has not received it. However, for the SCE area as a whole, based on hourly data reported by the CAISO (<u>http://oasis.caiso.com/mrtu-oasis/</u>), peak demand in 2011 was down 4¼ percent from 2010, and was the lowest since 2004.

⁸ SCE, response to CBD data request 5-7.

⁹ SCE, confidential attachments to response to CBD data request 6-6, provided 10/25/11.

¹⁰ SCE, response to CBD data request 5-7. **Construction of the second second**

¹¹ SCE, confidential attachments to CBD data request 6-6.

¹² Ibid.

¹³ Ibid.

the progression of SCE's load forecasts over time, and how they compare to the resources at the three existing ENA substations.¹⁴

SCE has provided minimal documentation to support the large increases in forecasted peak demand from 2012 to 2015. Between 2012 and 2013, almost half of the forecasted load growth occurs because SCE plans to shift MVA of load to substations in the Electrical Needs Area (ENA) from outside,¹⁵ even though the substations from which the load is being shifted would have sufficient reserves if they did not shift some of their load away.¹⁶ Between 2014 and 2015, more than three quarters of the forecasted increase in ENA loads is not due to load growth,¹⁷ but rather to loads being transferred into the ENA from the outside. Specifically, SCE projects moving MVA of load into the ENA from five different outside substations, even though the substations from which the load is being shifted would have sufficient reserves if they did not shift some of the away.¹⁸

Notwithstanding the dubiousness of SCE's forecasted load increases in the 2013-15 period, as described in the preceding paragraph, the analysis below relies upon SCE's numbers. Those numbers show the existing 400 MVA capacity of the existing facilities in the Electrical Needs Area¹⁹ will increase to 406.4 MVA in 2013.²⁰ ENA loads will first exceed that level in 2016.²¹ By 2020, the last year for which SCE has provided a load forecast, the 1-in-10 peak demand for the ENA will exceed its capacity without Presidential by MVA,²² and by 2022 the extrapolated shortfall will be a little over 60 MVA.²³

Looking beyond 2022 doesn't make any sense. SCE looks forward less than a decade in its distribution planning,²⁴ the CEC only forecasts demand through 2022,²⁵ and

¹⁷ Ibid., showing internal load growth under 1-in-10 conditions for the four ENA substations totals only MVA of the total MVA load increase for those substations. MVA = .7573 = 75.7%.

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¹⁴ Table 1 is marked as confidential because SCE has claimed that the underlying data is confidential. However, when aggregated to the level of the ENA, as done in Table 1, the SCE data is no different than the data provided, non-confidentially, in PEA Table 1.1.

¹⁵ SCE, confidential attachments to response to CBD DR 6-6, confidential DSP Substation Status Sheets for the Royal and Potrero substations, dated 10/9/11 and 9/14/11, respectively.

¹⁶ Ibid., confidential DSP Substation Status Sheets for Oak Park and Santa Susana substations, both dated 9/14/11, each showing a "criteria reserve" in 2013 larger than the amount transferred out to the ENA.

¹⁸ Ibid., confidential DSP Substation Status Sheets for Malibu, Moorpark, Newbury, Oak Park and Santa Susana substations, dated 9/14/11, each showing a "criteria reserve" in 2015 larger than the amount transferred out to the ENA.

¹⁹ SCE, PEA, p. 1-2, Table 1.1. The public data there is confirmed by SCE's confidential responses to CBD data requests 2-3 and 6-6.

²⁰ SCE, confidential attachments to response to CBD data request 6-6, confidential DSP Substation Status Sheets for Royal, Thousand Oaks, and Potrero substations, dated 10/9/11 (Royal) or 9/14/11 (the others).
²¹ SCE, confidential attachments to response to CBD data request 6-6, confidential DSP Substation Status Sheets for Presidential, Royal, Thousand Oaks, and Potrero substations, dated 10/9/11 (Royal) or 9/14/11 (the others). Sheets for Presidential, Royal, Thousand Oaks, and Potrero substations, dated 10/9/11 (Royal) or 9/14/11 (the others). Technically, the SCE-forecasted ENA load of MVA in 2016 could be met with the SCE-planned ENA transformer capacity (not counting Presidential) of 406.4 MVA in 2016, but doing so would require extremely precise load-rolling among the three non-Presidential ENA substations.
²² Ibid.

²³ Ibid., based on post-2020 load growth without transfers of approximately MVA per year (SCE shows a 2015-20 average of MVA).

²⁴ SCE, confidential "DSP Substation Status Sheets" provided to CBD in discovery, must recently in response to CBD data request 6-6.

the CPUC's Long Term Procurement Plan ("LTPP") only looks forward a decade.²⁶ The summer of 2022 is still more than a decade away – whether to spend money for Presidential in 2012-14 should not depend on forecasts of loads in 2023 even if such forecasts existed, which they do not. Thus the ESA does not need to start being implemented until 2016, and need not be bigger than 65 MVA, comparable to the 56 MVA Presidential project described in the DEIR.

B. What will the ESA need to consist of

The DEIR describes the ESA as consisting of nonstandard size transformers at existing substations, in order to allow more Mw of capacity than usual to be provided from those substations. However, a nonstandard number of transformers would also be a way to get more capacity, if space were available. The Center for Biological Diversity ("CBD") takes no position on which might be preferable, but there is precedent for both. With regard to transformer size, SCE has previously proposed to install both two 28 MVA transformers and two 56 MVA transformers at a single 160' x 267' 66 kV substation.²⁷ That is slightly smaller than the Royal substation, whose apparent dimensions are approximately 180' x 280'.²⁸ With respect to a non-standard number of transformers at a site, in its current GRC SCE is proposing to add a 28 MVA transformer at its Cabrillo 66 kV substation, bringing the total capacity at that substation up to 151.8 MVA.²⁹ That total number of Mw necessarily involves more than four transformers at the substation, unless there are currently three transformers averaging over 40 Mw each. At another 66 kV substation, Estrella, SCE has explicitly considered adding a fifth transformer, rated at 28 MVA, to four existing transformers of 22.4 MVA each.³⁰ Thus the ESA can either add capacity by replacing existing transformers with new ones rated above 28 MVA, or by adding a fifth standard-sized transformer at an existing substation if there is room for it, or by doing both.

In addition to new transformers, SCE in the normal course of business engages in what is known as load rolling. Load rolling consists of shifting circuits or segments of circuits from one substation to another in order to shift some of the associated load between substations. Load rolling is a normal practice used to smooth out the "lumpiness" associated with adding new transformers, or to balance loads between substations when load for one has grown faster than load for the other. Load rolling is part of SCE's proposed action in this proceeding – besides shifting load from Royal and Thousand Oaks substations (but not Potrero, the third existing ENA substation) to the

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²⁵ CEC publication CEC-200-2011-011-SD, the August 2011 "Preliminary California Energy Demand Forecast 2012-2022."

²⁶ CPUC, R.10-05-006, December 2010, "Standardized Planning Assumptions (Part 1) for System Resource Plans," with tables through 2020.

 ²⁷ SCE, 3/14/2000, Advice Letter 1440-E, p. 2 and Attachment A. Available online at http://www.sce.com/nr/sc3/tm2/pdf/1440-e.pdf.
 ²⁸ Royal substation located at approximately 1040 Cochran Street in Simi Valley. Dimensions estimated

^{2°} Royal substation located at approximately 1040 Cochran Street in Simi Valley. Dimensions estimated from Google maps, zoomed in to show a 50' yardstick tool.

 ²⁹ SCE, A.10-11-015 (TY2012 GRC), Ex. SCE-03, Vol. 3, Part 2 (Load Growth), p. 79.
 ³⁰ Ibid., p. 72.

new Presidential substation,³¹ SCE also intends to then shift load into the ENA from the Malibu, Moorpark, Oak Park, Newbury, and Santa Susana substations.³²

While the Presidential substation will provide enough new capacity to allow rolling load into the ENA from outside of it, there is no need for that kind of load rolling in the absence of Presidential. Malibu, Moorpark, Newbury, and Santa Susana substations will each still be able to reliably meet 1-in-10 peak loads in all years forecasted by SCE (e.g., through 2020) even if they roll no load to ENA substations.³³ Only Oak Park, where SCE plans to transfer a net of MVA into the ENA during 2015-2020, would have a reliability problem (starting in 2016, and still under MVA in 2020) if it did not roll load into the ENA.³⁴ Also, SCE has actually quantified load at ENA substations that could be rolled **away** from those substations to other substations outside the ENA.³⁵ Thus the ESA should also include the use of load rolling at levels already described as feasible by SCE, and the forgoing of SCE-planned load rolling where it no longer makes sense in the absence of the Presidential project.

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C. A feasible ESA exists

Based on the size and timing of the need in the ENA, the ESA could start by simply forgoing SCE's planned rolling of MVA of net load into the ENA in 2013-2015, as well as the MVA that SCE is planning to roll from Malibu substation to Potrero substation in 2016.³⁶ That would postpone the need for any other action until the ENA load exceeded 400 MVA in 2019,³⁷ and would leave all the non-ENA substations with positive reserves, even under 1-in-10 conditions, beyond SCE's 2020 planning horizon.³⁸ Then in 2019 SCE could either add a fifth standard-size 28 MVA (nameplate) transformer at Royal, or replace the existing two 22.4 MVA (nameplate) transformers in the ENA at Potrero substation³⁹ with non-standard transformers with nameplate ratings of approximately 36.4 MVA.⁴⁰ Either way the ESA would result in an increase of 28 MVA

³¹ SCE, confidential attachments to response to CBD data request 6-6, confidential DSP Substation Status Sheets for Presidential, dated 9/14/11.

³² SCE, ibid., confidential substation DSP Substation Status Sheets for the five named substations, all dated 9/14/11.

³³ Ibid.

³⁴ Ibid., DSP Substation Status Sheet for Oak Park, dated 9/14/11.

³⁵ SCE, confidential response to CBD data request 2-3.

³⁶ SCE, confidential 9/14/11 and 10/9/11 substation DSP Substation Status Sheets attached to response to CBD DR 6-6.

MVA, and thus postpone any additional ESA measures until 2019, when SCE would technically also have a surplus (**MVA** of load, versus **MVA** of resources), but one arguably too small to rely upon.

³⁸ Ibid.

³⁹ DEIR, p. 3-36.

⁴⁰ The DEIR describes the existing transformers as having base ratings of 16.8 MVA, which would be increased to 25-30 MVA in the replacement transformers (DEIR, pp. 3-24 and 3-25). That is an increase of 49-79% in transformer rating. (25/16.8 = 1.49; 30/16.8 = 1.79). Thus the nameplate ratings would presumably increase from 22.4 MVA to 33-40 MVA (22.4 * 1.49 = 33.4; 22.4 * 1.79 = 40.1). 36.4 MVA, the assumed size here, is in the middle of the range identified in the DEIR.

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in the nameplate ratings of the transformers in the ENA substations.⁴¹ Given the substantial amount of open space at the Royal substation as compared to the space used by the existing four transformers there, adding a fifth transformer at Royal seems feasible.⁴² At Potrero substation, there also appears to be enough room for two larger transformers to replace the existing smaller one(s), as described in the DEIR.⁴³ Indeed, even though Potrero substation is smaller than Royal substation (perhaps 150' x 225'),⁴⁴ the existing transformers are located asymmetrically,⁴⁵ and so there may be room for a fifth standard 28 MVA transformer at Potrero as well as at Royal.

Adding 28 MVA of new nameplate transformer capacity in 2019 would increase the total transformer capacity within the ENA by more than 28 MVA. The maximum capacity of transformers at Royal is percent of their nameplate and at Potrero is

capacity of transformers at Royal is percent of their nameplate and at Potrero is percent of their nameplate capacity.⁴⁶ Thus adding 28 MVA of nameplate capacity would be worth MVA at Royal or up to MVA at Potrero.⁴⁷ Combining that with the MVA gained from not doing SCE's planned 2013-15 load rolling into the ENA or its planned 2016 load rolling from Malibu to Potrero, the minimum increase in ENA net resources by 2019 would be MVA.⁴⁸ Foregoing SCE's planned loadrolling of MVA from Malibu to Potrero in 2020 would further improve the load/resource balance in the ENA after 2019. That would be enough to meet ENA needs through 2022.⁴⁹ In that year, potential load rolling out of the ENA would also provide up to an additional MVA of load reduction,⁵⁰ enough to provide a modest additional cushion towards meeting ENA needs in that year. The total net capacity gain to the ENA under this version of the ESA would be 72 MVA,⁵¹ comparable to the MVA for the proposed project as described in the DEIR.⁵²

results in a slight MVA surplus in 2022.

⁴¹ Replacing two 22.4 MVA transformers with two 36.4 MVA nameplate transformers increases nameplate MVA by 28. Adding a new 28 MVA nameplate transformer also increases nameplate MVA by 28.

⁴² Royal substation located at approximately 1040 Cochran Street in Simi Valley. Open space inside the substation observed from Google maps, zoomed in to show a 50' yardstick tool.

⁴³ Potrero substation located at approximately 2351 Townsgate Road, Westlake Village. Open space inside the substation observed from Google maps, zoomed in to show a 50' yardstick tool.

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ SCE, response to CBD data response 6-6, confidential 10/9/11 Royal and 9/14/11 Potrero DSP Substation Status Sheets.

⁴⁷ Ibid.

⁴⁹ 2020 ENA load of **MVA** with ongoing load growth of **WVA** per year, per SCE, responses to CBD data requests 6-6. Thus 2022 load equals **WVA** in 2022 under 1-in-10 peak conditions. Available MVA from foregone load rolling leaves **WVA** in 2022 under 1-in-10 peak conditions. Available transformer capacity of 406.4 MVA from post-2013 facilities at the Royal, Thousand Oaks, and Potrero substations (SCE, response to CBD DR 6-6), plus **WVA** from new or replacement transformer(s)

⁵⁰ amps of feasible load rolling from within the ENA to substations outside of it, per SCE confidential response to CBD data request 1-18d. 1 MVA per amps at 66 kV, per SCE confidential response to CBD data response 2-3.

⁵¹ MVA from either one new standard size transformer at Royal or Potrero, or two nonstandard-size replacement transformers at Potrero, MVA from foregone SCE-planned net load rolling into the ENA in 2013-15, MVA from foregone SCE-planned load rolling from Malibu to Potrero in 2016 and 2020, 9.4 MVA from load rolling out of the ENA.

MVA of SCE-planned load rolling from Oak Park substation into the ENA in 2016-20 would still

III. Other alternatives - System Alternative A - transformer replacements and load rolling

The DEIR rejected System Alternative A on the grounds that it would not meet reliability needs beyond the year 2014.⁵³ However, that conclusion is incorrect. As discussed above, even the No Action alternative (doing nothing) will meet ENA reliability needs until 2016,⁵⁴ and foregoing SCE's planned 2013-15 load rolling and doing nothing else will meet ENA reliability needs until 2019.⁵⁵

System Alternative A would thus start by foregoing and net MVA of 2013-15 load-rolling into the ENA, and also foregoing MVA of post-2015 load rolling into the ENA from the Malibu substation. It would continue in 2019 by replacing the two existing 22.4 MVA transformers in the ENA at the Potrero substation with 28 MVA (nameplate) transformers. That would increase ENA transformer capacity by MVA,⁵⁶ to MVA,⁵⁶

In 2020, using SCE's forecast data, ENA 1-in-10 peak load would be MVA. Foregoing 2013-20 load rolling into the ENA (except from Oak Park in 2016-20) would reduce the 1-in-10 load to MVA⁵⁸ and System Alternative A transformer capacity would be MVA. Adding the MVA of load rolling out of the ENA that SCE has identified as available would increase the surplus capacity in 2020. Thus, under System Alternative A, no new construction beyond replacing existing 22.4 MVA transformers with standard-sized 28 MVA transformers would be needed until 2021, and then only if the improbable SCE-forecasted load growth of over 50 MVA in 2010-2011 really occurs.⁵⁹ The net increase in ENA net load-serving capacity, as compared to SCE's forecasts, would be MVA.⁶⁰

In 2021, Alternative A would need to be expanded to meet SCE-forecasted load growth. The DEIR implies that such an expansion would not be feasible because there

⁵² The DEIR describes the Presidential substation as having two 28 MVA transformers. SCE, in the confidential DSP Substation Status Report for Presidential attached to its response to CBD data request 6-6, shows the effective rating from those two transformers as **100** MVA.

⁵³ DEIR, p. 3-37.

⁵⁴ See section II.A., above.

55 See section II.C., above.

⁵⁷ MVA of transformer capacity planned by SCE at Royal, Thousand Oaks, and Potrero substations in 2013-2020, per SCE confidential attachments to response to CBD DR 6-6.
 ⁵⁸ 447.2 - 23.4 - 5.8 = 418.0.

⁵⁹ From an actual load on 1-in-10 basis of MVA in 2010 (SCE, confidential response to CBD data request 5-7) to a forecasted load on a 1-in-10 basis of MVA in 2012 (SCE, confidential attachments to response to CBD data request 6-6. Note that CBD has requested actual 2011 peak demand data for the ENA, as well as peak demand in 2011 adjusted for 1-in-10 temperatures, but SCE has not supplied the requested data.

⁶⁰ MVA from foregone SCE-planned load rolling into the ENA, MVA from load rolling out of the ENA, MVA from replacing two smaller transformers.

occur under the ESA, in order to prevent resource shortfalls at the Oak Park substation (see confidential Oak Park DSP Substation Status Sheet attached to SCE's response to CBD DR 6-6).

⁵⁶ See SCE, 12/21/09, confidential Potrero DSP Substation Status Sheets. The Potrero DSP Substation Status Sheet explicitly shows the **MVA** gain from two replacements, because it includes those replacements in **MVA** even though SCE was also planning at the same time to build the Presidential substation. Note that the more recent 9/14/11 Potrero DSP Substation Status Sheet provided in response to CBD DR 6-6 no longer shows the two upgrades.

would be no room at the three existing substations in the ENA for additional transformers of SCE's standard 28 MVA (nameplate) rating. However, the DEIR ignores the option of adding more standard-sized transformers outside of the ENA and using them to meet ENA loads through load-rolling.

In SCE's current plans, it intends to roll MVA of load from the Oak park substation to the Potrero (MVA), Presidential (MVA), and Thousand Oaks (MVA) substations during the 2016-20 period, and still only have MVA of spare capacity at Oak Park after doing so.⁶¹ However, the Oak Park substation currently has only two 28 MVA (nameplate) transformers, and appears to have room to add a third one.⁶² Doing so would enable SCE to forego the planned 2016-20 load rolling away from Oak Park, and thus reduce ENA loads in 2020 by MVA.⁶³ That would increase the total impact of Alternative A on the ENA to 66.6 MVA,⁶⁴ enough to serve ENA loads beyond 2022.⁶⁵

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IV. Other alternatives – Energy efficiency and demand management (cf. p. 3-13, 3-37)

Energy efficiency ("EE") and demand response ("DR"; also known as load management or demand management or peak shaving) are two different things. Energy efficiency refers to measures that enable energy services to be provided with reduced levels of electricity input (e.g., more efficient air conditioners; TVs that use less electricity but still produce the same picture quality). To the extent that EE occurs during peak load hours (summer afternoons), it reduces peak load and thus the need for new transformers such as those proposed for Presidential. DR refers to actions taken to directly target peak electricity use (e.g., turning up thermostats in response to hot weather or high prices). Demand management may or may not conserve energy (air conditioners may run more in the early evening to reduce heat build-up during the afternoon), but it reduces peak demand, and hence reduces or postpones the need for new transformers such as those proposed for Presidential.

The DEIR rejects both energy efficiency and load management as an alternative to Presidential, on the grounds that (a) energy efficiency programs are already incorporated into SCE's load forecast, and (b) load management programs are dependent on voluntary participation.⁶⁶ Both of these claims are partially true, but also partially false.

⁶¹ SCE, 9/14/11 confidential DSP Substation Status Sheet for the Oak Park substation, attached to SCE's response to CBD DR 6-6. The actual DSP status sheet includes Mw of load rolling from Oak Park to Presidential in 2015 and shows a resultant MVA surplus in 2020. Since the analysis above assumes SCE foregoes its planned 2013-15 load-rolling, the MVA that would have been rolled to Presidential in 2015 would remain at Oak Park, reducing the 2020 Oak Park surplus to MVA.

⁶² Oak Park substation is located at approximately 1040 Cochran Street in Simi Valley. Available space was estimated from Google Maps, zoomed in to show a 50' yardstick tool.

⁶³ SCE, 9/14/11 confidential DSP Substation Status Sheet for the Oak Park substation, attached to SCE's response to CBD DR 6-6.

⁶⁴ MVA from load-rolling and two transformer upgrades in 2019. MVA ENA impact from a new transformer at Oak Park.

 ⁶⁵ See section II.A. above, showing that the ESA need not be bigger than 65 MVA to meet reliability goals.
 The same calculation would apply to Alternative A. 66.6 MVA is bigger than 65 MVA.
 ⁶⁶ DEIR, p. D-37.

A. Energy efficiency (EE) not already included in forecasts

Energy efficiency (EE) due to existing standards and programs is indeed incorporated into both official forecasts of the California Energy Commission (CEC) and SCE's internal forecasts. However, uncommitted EE is not. Uncommitted EE consists of three categories - EE due to newly adopted state and Federal standards (such as for television sets), EE due to post-2012 utility programs, and EE due to proposed large new efforts which are referred to collectively as "Big Bold Energy Efficiency Strategies," or BBEES. The CEC forecasts each of these categories independently.⁶⁷

The CPUC has previously addressed the question of how to deal with uncommitted EE in resource planning. In R.10-05-006, the 63 page "Standardized Planning Assumptions (Part 1) for System Resource Plans" issued in December 2010 discussed in detail, and quantified, how service area load forecasts should be adjusted for uncommitted EE. The CPUC concluded that Standards and programs should be quantified using the CEC's mid-case forecast, while BBEES should be based on the CEC's low-case forecast.68 A just-issued Proposed Decision ("PD") in R.10-05-006 reaffirms that SCE's planning should be based on the CPUC's standardized planning assumptions, at least for years after 2016.69

Consistent with the CPUC's prior direction, I have reviewed the most recent CEC forecasts for incremental EE for SCE. They show low-case BBEES as zero, but mid-case standards and utility programs amount to quite sizable numbers of megawatts. Specifically, uncommitted mid-case EE other than BBEES reduces SCE's system peak load by 0.50 percent in 2013, 1.47 percent in 2015, 3.99 percent in 2020, and 5.23 percent in 2022.⁷⁰ Accounting for the fact that mid-case peak load is only of 1-in-10 peak load,⁷¹ and assuming uncommitted EE will not increase under 1-in-10 conditions, then the uncommitted mid-case EE other than BBEES will reduce SCE's system peak load by 3.64 percent in 2020⁷² and by 4.77 percent in 2022. Between 2020 and 2022, SCE 1-in-10 system peak load without uncommitted EE grows 615 Mw,⁷³ but mid-case uncommitted EE other than BBEES offsets 349 Mw of that.⁷⁴ or 57 percent.⁷⁵

⁶⁷ Most recently, see CEC publication CEC-200-2011-011-SD, the August 2011 "Preliminary California Energy Demand Forecast 2012-2022," at p. 186.

⁶⁸ CPUC, R.10-05-006, December 2010, "Standardized Planning Assumptions (Part 1) for System Resource Plans," p. 10 of 63: "Common value assumptions for EE reflect the sum of (1) utility EE program savings embedded in the most recent IEPR demand forecast including savings decay, and (2) incremental EE savings reasonably expected to occur from implementing the IOU's EE goals, relative to the most recent IEPR load forecast. For this proceeding, this value is the mid-case results for all values except for Big Bold EE Strategies, for which the low-case results should be used.

⁶⁹ ALJ's PD, 11/10/11, p. 16. Available on-line at http://docs.cpuc.ca.gov/efile/PD/151314.pdf, ⁷⁰ CEC publication CEC-200-2011-011-SD, the August 2011 "Preliminary California Energy Demand Forecast 2012-2022," at pp. 186 (uncommitted mid-case EE other than BBEES) and 193 (peak load forecast before uncommitted EE).

⁷¹ SCE, confidential response to CBD data request 4-2, ratio of projected peak demands under normal conditions and 1-in-10 heat storm conditions. $^{72}.9124 * .0399 = .0364.$

⁷³ CEC publication CEC-200-2011-011-SD, the August 2011 "Preliminary California Energy Demand Forecast 2012-2022," p. 193, showing a 561 Mw increase in SCE peak load. That is for normal weather (1in-2) peak load. The corresponding 1-in-10 peak load increase would be 561/.9124 = 615 Mw. 74 Ibid., p. 186.
Applying those percentages to the loads in question in this case – loads served currently from the Royal, Thousand Oaks and Potrero substations, and in the future from the Presidential substation - SCE's most recent available projections of loads at those substations are from the late summer and early fall of 2011.⁷⁶ SCE projects a 1-in-10 peak load from those substations of MVA in 2020, the last year it forecasts.⁷⁷ After that load grows about MVA per year.⁷⁸ Thus, the CPUC's methodology implies that uncommitted EE will reduce peak load by approximately MVA in 2020,⁷⁹ and a further MVA each year after that.⁸⁰ A decade from now, by the summer of 2022, the effect of uncommitted EE on SCE's load forecast will be a 27.6 MVA reduction for the three "Electrical Needs Area" substations surrounding the Presidential site.⁸¹

B. Demand response in the LTTP forecast is NOT in the SCE forecast

DR has been defined by the CPUC as "the reasonable levels of DR resources that the Commission has authorized funding [for], directed in its DR policy decisions, and relied on the benefits [of] for approving funding for other projects."⁸² In particular, the Commission has approved expenditures of billions of dollars by California's IOUs, SCE, included, for smart meters. Much of that investment has been justified by the expected DR benefits that will be enabled by those smart meters. It makes no sense to forecast DR benefits as a basis for billions of dollars of meter investments, and then ignore those exact same benefits when looking at other IOU investment decisions.

DR impacts are not part of the CEC (or SCE) load forecasts, but are treated instead as equivalent to supply-side resources. In the current LTPP proceeding, the Commission has explicitly described how DR is to be counted,⁸³ and quantified the MW impacts expected from DR.⁸⁴ The CPUC expects DR to reduce SCE's 1-in-2 system peak by 2842 Mw by 2015, and then remain constant.⁸⁵ SCE's forecasted 1-in-2 system peak demand before DR and EE is 22561 Mw.⁸⁶ Thus, the CPUC has projected 2015 SCE DR equal to 12.60 percent of SCE-s 1-in-2 peak demand that year before EE and DR adjustments.⁸⁷ As referenced above, a just-issued PD in R.10-05-006 reaffirms that SCE's.

⁷⁶ SCE, confidential attachments to response to CBD data request 6-6, dated 10/9/11 (Royal substation) and 9/14/11 (all other substations).

⁷⁸ Ibid. ⁷⁹ .0364 *

27.6 MVA.

⁸² CPUC, R.10-05-006, December 2010, "Standardized Planning Assumptions (Part 1) for System Resource Plans," p. 10 of 63.

⁸³ Ibid.: "Specifically, the common value levels of demand response (DR) assumed in the required scenarios reflect adopted 2009-11 DR programs in D.09-08-027 and DR programs approved through other Commission proceedings. The common value also includes load impacts from reasonably anticipated DR programs/resources such as those enabled by the IOU's Advanced Metering Infrastructure (AMI) systems ("AMI Enabled DR"), of which the estimated benefits were included in the Commission-approved AMI decisions."

⁸⁴ Ibid., pp. 18, 21, 24, 27 (the same DR numbers appear on all four pages), line 24.

85 Ibid.

86 Ibid.

⁸⁷ 2842 / 22561 = .1260.

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⁷⁵ 349/615 = .5675

⁷⁷ Ibid.

^{80 .5675 *}



response to CBD data request 5-1, but do not include actual 2011 data (indeed, they do not include accurate 2010 data either). CBD has requested summer 2011 peak load data, but has not yet received it as of 11/8/11.

⁹⁸.0086 * (**1**) = (**1**)

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above) is a reduction of more than 76 MVA by 2022.⁹⁹ More than MVA of this will occur by 2015, the year before the date when 1-in-10 peak demand for the relevant substations would otherwise first exceed 400 MVA,¹⁰⁰ the current installed transformer capacity.¹⁰¹ 2015 is also the first year SCE expects to have the Presidential substation on-line to meet summer peak demand.¹⁰²

What the preceding analysis shows is that no special efforts beyond those already underway are required for a viable demand-side alternative. If the Presidential ENA attains its proportional share of the SCE-wide uncommitted EE (not counting anything for BBEES) and DR that the Commission has already ruled should be used in LTPP analyses, it will achieve more through EE and DR (76+ MVA) than the proposed action would provide (MVA). 1-in-10 peak load in the ENA will be barely MVA even in 2022, ¹⁰³ a level that SCE once thought it would exceed by 2011.¹⁰⁴ Beyond 2022, net load growth will be only about MVA per year,¹⁰⁵ so the existing 400 MVA of transformer capacity at Royal, Potrero, and 1000 Oaks substations will be sufficient to meet 1-in-10 peak load well beyond 2022 with no new construction and no modification to SCE's load-rolling plans.¹⁰⁶

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= 76.4 MVA.

¹⁰⁰ MVA in 2015, per SCE, confidential Attachment 1 to response to CBD data request 5-1. ¹⁰¹ 400 MVA in each of the years 2008-14 per SCE, 12/22/08, Proponent's Environmental Assessment [PEA], p. 1-2, Table 1.1.

-76.4 = Mw.

¹⁰⁴ SCE, 12/22/08, Proponent's Environmental Assessment [PEA], p. 1-2, Table 1.1, showing 401 MVA in 2011. CBD has requested 2011 actuals but had not received them as of 11/11/11.

¹⁰⁵ MVA per year per SCE, minus MVA due to uncommitted EE other than BBEES, as discussed above.

¹⁰⁶ 400 – MVA capacity margin in 2022. With load growth of MVA per year (see preceding footnote), MVA would last **an example** 2+ years, or through 2024.

¹⁰² SCE, confidential DSP Substation Status Sheet for Presidential substation, attachment to response to CBD data request 6-6, dated 9/14/11.

V. Other alternatives - Combination of transformer replacements, load rolling, EE, and DR

The two alternatives other than the ESA discussed above (28 MVA transformer replacements plus load rolling; EE plus DR) would provide a combined total of almost MVA through 2022, and more after that.¹⁰⁷ They would thus be sufficient on a combined basis to meet the 1-in-10 peak demands of the "Electrical Needs Area" for decades to come.

VI. Other alternatives - smaller Presidential substation with radial feed from Royal

The DEIR indicates that it rejected out of hand alternatives that would supply a new Presidential substation with only a single 66 kV subtransmission line. For the proposed 56 MVA size of the Presidential substation, that rejection makes sense. However, for smaller substations, SCE does allow single subtransmission lines. For example, in the same Moorpark subtransmission system that SCE is proposing to modify in this proceeding, SCE already has a substation fed by only a single 66 kV subtransmission line – the Tapia substation on the coast between Malibu and Santa Monica.¹⁰⁸ Tapia had a peak load in 2010 of MVA.¹⁰⁹

SCE already plans to convert an existing smaller transformers at Royal substation to its standard 28 MVA nameplate size transformer,¹¹⁰ and to use load rolling among its 66 kV substations in the Presidential area. By combining those plans with installation of just one transformer at Presidential, SCE could meet its 1-in-10 peak demand through its 10-year planning horizon and reduce the environmental impacts of Presidential. CBD is not proposing such an alternative, since the ESA and the other alternatives discussed above all avoid 100 percent of the impacts of building Presidential. However, this is another example of an alternative that the DEIR inappropriately rejects out of hand.

If SCE were to build just the Madera Road portion of DEIR alignment 2, and install only 28 MVA of transformer capacity at Presidential, it would still be able to meet its local 1-in-10 peak needs with additional measures at existing substations that are already part of its plans, without having to encroach at all into the relatively undeveloped area west of the Presidential site.¹¹¹

Since there would be **MVA** of total capacity at Presidential,¹¹² and since average circuit loads are about 12 MVA under 1-in-10 conditions, this reduced-size

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¹⁰⁷ 76.4 MVA from uncommitted EE other than BBEES, plus DR; see section IV.D, above. MVA from load-rolling plus replacing two smaller transformers with 28 MVA transformers. 76.4 + MVA MVA. These numbers do not include the impacts of adding a third 28 MVA (nameplate) transformer at oak park substation.

 ¹⁰⁸ CEC, Publication 700-97-001. See also SCE's confidential response to CBD data request 1-24.
¹⁰⁹ SCE, confidential response to CBD data request 4-1.

¹¹⁰ SCE, 10/09/11, Royal DSP Substation Status Sheet, attachment to SCE response to CBD DR 6-6.

¹¹¹ As described above, the ESA only requires 28 MVA of new transformer capacity. Thus, an alternative with only 28 MVA of new transformer capacity at Presidential would also be adequate to meet ENA peak loads through the planning horizon.

¹¹² SCE, 9/14/11, Presidential DSP Substation Status Sheet, attachment to SCE response to CBD DR 6-6.

alternative for Presidential would still allow three circuits to be fed from Presidential.¹¹³ That would more than meet the DEIR's goal of having two new circuits fed from Presidential.¹¹⁴ Future expansion options would include expanding Presidential if a second 66 kV feed can be developed that is environmentally acceptable

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VII. Alternatives which only delay the proposed project still make economic sense

The DEIR rejects several alternatives on the grounds that they would only delay the timing of the Presidential project, and not obviate any need for it. For some of those alternatives the DEIR is factually wrong – the rejected alternative is fully capable of replacing the proposed project throughout SCE's substation planning horizon. However, even if the DEIR were correct that an alternative would only defer and not replace the Presidential project, that still does not mean that the alternative should be rejected on that basis alone.

Presidential is expected to cost 55 million dollars.¹¹⁵ Delaying that expenditure saves ratepayers money, because SCE's rate of return on investment (~9% per year) is bigger than the expected inflation in substation costs (~3% per year for B-bank transformers, the kind used at 66 kV substations).¹¹⁶

The economic benefit to ratepayers of delaying Presidential is about \$3.3 million per year of delay.¹¹⁷ So any alternative that costs less than that is worthwhile even if its environmental benefits are valued at zero. SCE estimates that B-bank transformers like those used in the ENA cost about \$1 million each,¹¹⁸ and has described one project to replace two 22.4 MVA transformers with two 28 MVA transformers as costing a total of \$2.84 million.¹¹⁹ Since transformer replacements of that type each add about **1** MVA,¹²⁰ enough to meet near-term load growth for more than a year,¹²¹ two of them for \$2.84 million would save ratepayers about \$6.6 million in Presidential deferral value, and thus would make sense even if the Presidential substation will eventually be built.

Even cheaper than transformer replacement is foregoing load rolling. Foregoing currently planned 2013-15 net load rolling into the ENA would reduce ENA loads by

¹¹⁷ \$55 million x 6%/year.

¹¹⁹ Ibid., p. 72.

¹¹³ Cf. SCE, 9/14/11, Presidential DSP Substation Status Sheet, attachment to SCE response to CBD DR 6-6, showing 6 circuits with two transformers.

¹¹⁴ The DEIR implies that Presidential would be located near the terminus of circuits from all three of the existing ENA substations, Royal, Potrero, and Thousand Oaks. However, SCE has supplied a map which shows that the Presidential site is actually near the border of distribution circuits from the Royal and Moorpark substations. Thus it is not so obvious why there is a need to have circuits originating from Presidential to relieve distribution service from the Potrero or Thousand Oaks substations.

¹¹⁵ SCE 5/3/2011, Question 2. Southern California Edison, Presidential Substation Project A.08-12-023, Data Request Set Presidential CBD-05: Question 2..

¹¹⁶ Ibid., p. 74.

¹¹⁸ SCE, TY2012 GRC testimony, Ex. SCE-03, Volume 3, p. 74.

¹²⁰ SCE, 12/21/09, confidential Potrero DSP Substation Status Sheet; see also SCE, 10/09/11, Royal DSP Substation Status Sheet, attachment to SCE response to CBD DR 6-6.

¹²¹ SCE, 10/09/11 and 9/14/11, DSP Substation Status Sheets, attachments to SCE response to CBD DR 6-6, showing average load growth of 6.4 MVA per year in the 2011-17 period, not counting changes due to load-rolling into the ENA.

MVA at basically zero cost,¹²² which would defer the need for anything else until 2019.¹²³ So at a minimum, that should be done. A15-63

 ¹²² See discussion above regarding load rolling options.
¹²³ 2018 load forecast with SCE planned load rolling into the ENA equals MVA, per SCE, confidential attachments to response to CBD data request 6-6. Existing resources are 400 MVA per SCE, PEA, Table 1.1. The gap of MVA would be more than covered by the 2013-15 load rolling options of MVA discussed above, as well as additional post-2015 load rolling options also discussed above.

RESUME

November 2011

DAVID I. MARCUS P.O. Box 1287 Berkeley, CA 94701-1287

Employment

Self-employed, March 1981 - Present

Consultant on energy and electricity issues. Clients have included Imperial Irrigation District, the cities of Albuquerque and Boulder, the Rural Electrification Administration (REA), BPA, EPA, the Attorney Generals of California and New Mexico, alternative energy and cogeneration developers, environmental groups, labor unions, other energy consultants, and the Navajo Nation. Projects have included economic analyses of utility resource options and power contracts, utility restructuring, utility bankruptcy, nuclear power plants, non-utility cogeneration plants, and offshore oil and hydroelectric projects. Experienced user of production cost models to evaluate utility economics. Very familiar with western U.S. grid (WSCC) electric resources and transmission systems and their operation and economics. Have also performed EIR/EIS reviews, need analyses of proposed coal, gas and hydro powerplants, transmission lines, and coal mines. Have presented expert testimony before FERC, the California Energy Commission, the Public Utility Commissions of California, New Mexico, and Colorado, the Interstate Commerce Commission, and the U.S. Congress.

Environmental Defense Fund (EDF), October 1983 - April 1985

Economic analyst, employed half time at EDF's Berkeley, CA office. Analyzed nuclear power plant economics and coal plant sulfur emissions in New York state, using ELFIN model. Wrote critique of Federal coal leasing proposals for New Mexico and analysis of southwest U.S. markets for proposed New Mexico coal-fired power plants.

California Energy Commission (CEC), January 1980 - February 1981

Advisor to Commissioner. Wrote "California Electricity Needs," Chapter 1 of <u>Electricity</u> <u>Tomorrow</u>, part of the CEC's 1980 Biennial Report. Testified before California PUC and coauthored CEC staff brief on alternatives to the proposed 2500 megawatt Allen-Warner Valley coal project.

CEC, October 1977 - December 1979

Worked for CEC's Policy and Program Evaluation Office. Analyzed supply-side alternatives to the proposed Sundesert nuclear power plant and the proposed Point Concepcion LNG terminal. Was the CEC's technical expert in PG&E et. al. vs. CEC lawsuit, in which the U.S. Supreme Court ultimately upheld the CEC's authority to regulate nuclear powerplant siting.

Energy and Resources Group, U.C. Berkeley, Summer 1976

Developed a computer program to estimate the number of fatalities in the first month after a major meltdown accident at a nuclear power plant.

Federal Energy Agency (FEA), April- May 1976

Consultant on <u>North Slope Crude. Where To? How?</u>, a study by FEA's San Francisco office on the disposition of Alaskan oil.

Angeles Chapter, Sierra Club, September 1974 - August 1975

Reviewed EIRs and EISs. Chaired EIR Subcommittee of the Conservation Committee of the Angeles Chapter, January - August 1975.

Bechtel Power Corporation (BPC), June 1973 - April 1974

Planning and Scheduling Engineer at BPC's Norwalk, California office. Worked on construction planning for the Vogtle nuclear power plant (in Georgia).

Education

Energy and Resources Group, U.C. Berkeley, 1975 - 1977

M.A. in Energy and Resources. Two year master's degree program, with course work ranging from economics to engineering, law to public policy. Master's thesis on the causes of the 1972-77 boom in the price of yellowcake (uranium ore). Fully supported by scholarship from National Science Foundation.

University of California, San Diego, 1969 - 1973

B.A. in Mathematics. Graduated with honors. Junior year abroad at Trinity College, Dublin, Ireland.

Professional Publications

"Rate Making for Sales of Power to Public Utilities," with Michael D. Yokell, in <u>Public</u> <u>Utilities Fortnightly</u>, August 2, 1984.

Exhibit 3

ENA load and resource forecasts from SCE [Filed under seal]

Megan Steer

From:	Michael Manka
Sent:	Tuesday, November 15, 2011 8:06 PM
То:	Nisha Chauhan
Subject:	FW: A.08-12-023: Motion to File Material Under Seal of the Center for Biological Diversity
Attachments:	2011-11-15.Cert of service.A.08-12-023.pdf; 2011-11-15.Motion to File docs under seal.A.08-12-023.pdf; 2011-11-15.Public.CBD.DEIR.comments.A.08-12-023.pdf

Please file this, thanks

Mike Manka ESA 707-795-0908 mmanka@esassoc.com

From: Jonathan Evans [mailto:jevans@biologicaldiversity.org] Sent: Tuesday, November 15, 2011 5:34 PM

To: edelmana@smmc.ca.gov; six.sullys@verizon.net; relizasuliv@gmail.com; aalbano@toaks.org; albert.garcia@sce.com; mgr@reichradcliffe.com; crcronin879@sbcglobal.net; chrishansing@earthlink.net; Harvey@corr.org; pooch4@aol.com; thegoosenest@roadrunner.com; mdcinc@covad.net; Richard@queticollc.com; sgibson537@aol.com; gaston@gerberhinge.com; mtlegal@hotmail.com; ttsechiu@yahoo.com; JEVANS@BIOLOGICALDIVERSITY.ORG; cassandra.sweet@dowjones.com; liddell@energyattorney.com; "'fxygma@webt.v.''@Opus1.COM; mtowne@toaks.org; case.admin@sce.com; Kari.Finley@ventura.org; jim@westoaksettlement.com; jbrewer@bandtcpas.com; jlcdds@earthlink.net; jvacca@ci.moorpark.ca.us; revoskanian@mac.com; lisette@gerberhinge.com; marcotodesco@sbcglobal.net; wmgantzer@aol.com; mercedes.todesco@jpmchase.com; mday@goodinmacbride.com; cem@newsdata.com; Michael Manka; djg@cpuc.ca.gov; hsy@cpuc.ca.gov; jbm@cpuc.ca.gov; mpo@cpuc.ca.gov Subject: A.08-12-023: Motion to File Material Under Seal of the Center for Biological Diversity

Dear interested parties:

Attached you will find the public version of the MOTION OF THE CENTER FOR BIOLOGICAL DIVERSITY FOR LEAVE TO FILE

MATERIAL LABELED CONFIDENTIAL UNDER SEAL; CONFIDENTIAL MATERIAL ATTACHED AND FILED UNDER SEAL filed today with the California Public Utilities Commission.

Note that this filing also includes the public version of the comments of the Center for Biological Diversity on the Draft Environmental Impact Report for the Presidential Substation Project.

Should you have any problems with this message or the attachments please contact me at the contact information below.

Sincerely,

Jonathan Evans Toxics and Endangered Species Campaign Director, Staff Attorney Center for Biological Diversity 351 California St., Ste. 600 San Francisco, CA 94104 work- (415) 436-9682 x318 cell- (213) 598-1466 www.biologicaldiversity.org

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have served a true copy public non-confidential version of the MOTION OF THE CENTER FOR BIOLOGICAL DIVERSITY FOR LEAVE TO FILE MATERICAL LABELED CONFIDENTIAL UNDER SEAL; CONFIDENTIAL MATERIAL ATTACHED AND FILED UNDER SEAL on the following parties and state service parties on the most recently updated service list available on the California Public Utilities Commission website Application number 08-12-023 and attached, via email to those listed with email and via U.S. mail to those without email service.

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

November 15, 2011 San Francisco, CA.

onathan Evans



CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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FOR: KELLY VANDERGEEST

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GASTON MONAST 5006 READ ROAD THOUSAND OAKS, CA 93021-8765 FOR: GASTON MONAST/DEER CREEK COMMUNITY FOR: TERESA TODESCO/DEZIDERIO ASSOCIATION

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U-338-e) for a Permit to Construct Electrical Facilities With Voltages Between 50 kV and 200 kV: Presidential Substation Project

Application No. 08-12-023 (Filed December 22, 2008)

MOTION OF THE CENTER FOR BIOLOGICAL DIVERSITY FOR LEAVE TO FILE MATERICAL LABELED CONFIDENTIAL UNDER SEAL; CONFIDENTIAL MATERIAL ATTACHED AND FILED UNDER SEAL

[PUBLIC VERSION]

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Date: November 15, 2011

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U-338-e) for a Permit to Construct Electrical Facilities With Voltages Between 50 kV and 200 kV: Presidential Substation Project

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MOTION OF THE CENTER FOR BIOLOGICAL DIVERSITY FOR LEAVE TO FILE MATERIAL LABELED CONFIDENTIAL UNDER SEAL; CONFIDENTIAL MATERIAL ATTACHED AND FILED UNDER SEAL

Pursuant to the California Public Utilities Commission (CPUC) Rule of Practice and Procedure 11.4 the Center for Biological Diversity (the Center), hereby submits its motion for leave to file materials marked as confidential under seal. Pursuant to communications with staff at the CPUC we are requesting that these materials be filed under seal.

The materials were provided to the Center by Southern California Edison (SCE) in response to data requests filed by the Center. SCE labeled the material as "Not for Public Release – Contains Critical Energy Infrastructure Information" and/or "This Data Request Contains Protected Material - Contains Critical Energy Infrastructure Information." Additionally, the Center has compiled information based on those responses to data requests and, in an abundance of caution, are treating that information as confidential. The Center does not concur that all of the materials marked as Critical Energy Infrastructure Information are appropriately labeled Critical Energy Infrastructure Information or are confidential, but submit them under seal at this time at the request of SCE and the CPUC.

Therefore, the Center moves for an order to allow those sections of the Center's

comments, and exhibits to those comments that may include confidential energy infrastructure

information to be filed under seal. Specifically the Center seeks to file the following under seal:

- Unredacted version of the comments of the Center for Biological Diversity on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023).
- Exhibit 1 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "Figure 1.2 Electrical Needs Area Substations Capacity and Peak Demand."
- Unredacted version of Exhibit 2 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "Comments on the Presidential Substation DEIR" by David Marcus.
- Exhibit 3 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "ENA load and resource forecasts from SCE."

Respectfully submitted,

Center for Biological Diversity

Date: November 15, 2011

By:

Yonathan Evans CENTER FOR BIOLOGICAL DIVERSITY 351 California ST, Suite 600 San Francisco, CA. 94104 Telephone: (415) 436-9682 x318 Facsimile: (415) 436-9683 E-Mail: jevans@biolologicaldiversity.org

PROPOSED ADMINISTRATIVE LAW JUDGE RULING

Having reviewed the Motion of the Center for Biological Diversity, for Leave to File

Exhibit A under seal,

IT IS HEREBY RULED that:

The following materials, which were submitted on November 15, 2011, are designated

accepted for filing under seal:

- Unredacted version of the comments of the Center for Biological Diversity on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023).
- Exhibit 1 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "Figure 1.2 Electrical Needs Area Substations Capacity and Peak Demand."
- Unredacted version of Exhibit 2 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "Comments on the Presidential Substation DEIR" by David Marcus.
- Exhibit 3 of the Comments of the Center for Biological Diversity on the on the Draft Environmental Impact Report for the Presidential Substation Project (A.08-12-023), entitled "ENA load and resource forecasts from SCE."

DATED: , 2011

BY:

Administrative Law Judge

3.2.15 Letter A15 – Responses to Comments from Center for Biological Diversity (CBD)

- A15-1 The Center for Biological Diversity expresses its support of System Alternative B. See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-2 This is a summary comment and refers specifics to later comments provided later in their comment letter. However, the comment states that the Draft EIR requires recirculation as if falls short of the standards for adequacy under CEQA. CEQA §15151 defines the standard for adequacy of an EIR as:

"An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible."

The Draft EIR meets this level of adequacy, and combined with responses to comments in this document furthers this level of adequacy; therefore, no recirculation of the Draft EIR is necessary. See Responses A15-3 through A15-63 for specific responses to issues raised by the commenter. Also see Responses A5-1 and A5-6.

- A15-3 The commenter expresses concerns about the project objective regarding electrical demand established in Draft EIR, Chapter 2, *Project Description*. Regarding electrical demand see Master Response 1, *Alternatives*, in Section 3.1.1.
- A15-4 The commenter expresses concerns that the project objectives are outdated. The commenter is correct that some of the basis for the project objectives has changed with the passage of time. Partially in response to this comment and responses to additional data request from SCE, the project objectives have been updated; see Master Response 1, *Alternatives*, in Section 3.1.1. Note that as explained in Master Response 2, *Non-CEQA Issues*, in the discussion on CPUC General Order No. 131-D, a detailed analysis of a project's purpose and need is not necessary for a permit to construct project. Regarding the commenter's statements about apparent conflicts between the purpose of the Proposed Project in working papers versus the EIR objectives, the goals of the Proposed Project in the EIR have always included meeting electrical demand and the updated objectives reflect this as well. There is no conflict in purpose about the Proposed Project.
- A15-5 Regarding electrical demand and CPUC General Order No. 131-D, see Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 2, *Non-CEQA Issues* in Section 3.1.2.

- A15-6 Regarding issues pertaining to the electrical needs area (ENA), see Master Response 2, *Non-CEQA Issues*. Regarding the range of alternatives considered in the EIR, see Master Response 3.1.1, *Alternatives*, and Response A5-1.
- A15-7 See Master Response 2, *Non-CEQA Issues* for a discussion of the choice of the ENA in Section 3.1.2.
- A15-8 The commenter is referring to a summary description of project components in Table ES-1 (which is taken from the Project Description Table 2-1). The commenter states that this summary table, which provides a general overview, is evidence of a "shifting project description." The commenter is specifically referred to the additional detail provided in Draft EIR Table 2-2; Section 2.5.3, *Distribution Conductor Relocation and Telecommunication Lines*, and Section 2.8, *Construction*, for the further project detail sought by the commenter. See also Chapter 4 for any text changes made to these sections in the Final EIR.
- A15-9 The commenter states that the Proposed Project's design incorporating the capacity to accommodate, in the future, one additional 66kV subtransmission source line and eight additional 16kV distribution getaways represents segmentation or piecemealing because the Draft EIR fails to analyze these two future projects, which the commenter asserts are part of the Proposed Project. The CPUC disagrees with commenter's assertions on this issue. CEQA Section 15144 recognizes that EIRs involve "some degree of forecasting" and that "while foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose what it reasonably can." Furthermore, CEQA Section 15144 also applies to the actions of an agency regarding speculation of impacts. In fact, on page 2-7 of the Draft EIR, the document states that the Proposed Project would be built to accommodate, not build, the additional 66 kV and 16 kV lines. The project design is a case of SCE practicing good planning in allowing for a potential future use, which is not within SCE's 10-year planning period (assumed to be ending in about 2019 for the Draft EIR and now with the passage of time can be considered to end in about 2021) as the Draft EIR clearly states:

"Since ultimate build-out is not identified within SCE's 10 year planning period, the potential alignments of the additional subtransmission line and 16kV distribution circuits is highly speculative."

Thus, the Draft EIR has correctly disclosed what is foreseeable about this potential future plan, explains why it cannot be addressed as part of this Proposed Project, and identifies that if and when SCE would need to build these lines additional review and disclosure would be required; therefore, the Draft EIR has not segmented or piecemealed the Proposed Project.

A15-10 See Response A15-9.

A15-11 See Response A15-9.

- A15-12 The commenter states that the Draft EIR does not identify the site as a wildlife corridor and neglects to mention the common wildlife species (e.g., Chalcedon checkerspot butterfly, mountain lion, mule deer, and acorn woodpecker) that use such corridors. The discussion of wildlife movement corridors on pages 4.4-6 to 4.4-7 of the Draft EIR considers the Proposed Project in the framework of the South Coast Missing Linkages Project without specifically discussing individual wildlife species. As discussed in the Draft EIR, wildlife movement corridors have been regionally reduced by the conversion of natural lands for agriculture and large scale development. As the Draft EIR states on page 4.4-41, given the relatively small size of the substation and its adjacency to existing urban development, the Proposed Project is not expected to greatly hinder regional wildlife movement between these larger areas of open space, or to significantly alter current patterns of wildlife movement. Also, the proposed subtransmission alignments would not block or hinder wildlife regional movement. No project impacts are expected to Chalcedon checkerspot butterfly, mountain lion, mule deer, or acorn woodpecker.
- A15-13 The commenter notes that the Proposed Project must comply with the Federal Endangered Species Act (FESA). It also states that the Proposed Project would result in the harm or harassment to several listed species and designated critical habitat. Depending upon the selected alternative, the applicant may or may not need to undergo formal consultation with the USFWS to address potential project impacts to federally listed species. It is anticipated that formal consultation with the USFWS could be required to address potential project impacts to coastal California gnatcatcher and designated critical habitat for this species; however, the need for formal or informal consultation is left to the discretion of the USFWS following their review of permitting documents, typically a Biological Assessment, to be prepared and submitted to a federal permitting agency (e.g., the U.S. Army Corps of Engineers [Corps]) by the applicant in support of their consultation with the USFWS.

Project impacts to wetlands would be subject to review and approval by the Corps. As a component of project permitting under the §404 of the federal Clean Water Act, the Corps would consult with the USFWS under FESA §7 to resolve project impacts to federally listed plant and wildlife species. The comment that a Habitat Conservation Plan (HCP) would be required for the project under FESA §10 is incorrect. Involvement by the Corps for compliance with Clean Water Act provisions suggest that the Proposed Project would likely be authorized under FESA §7.

Formal consultation is typically initiated after a single preferred project is selected by the lead agency during the CEQA process. This is because the USFWS

3.2 Agencies and Organizations Responses

Biological Opinion only permits a single project, and not a suite of alternatives. Thus, agency consultation and their decision regarding whether or not a federal take permit is required is forthcoming. The statement that "the proposed project cannot proceed in violation of the Endangered Species Act" is generally correct. As necessary, the Proposed Project would comply with FESA by seeking required permits or approvals from the USFWS.

A15-14 The first portion of the comment notes that the Proposed Project would impact designated critical habitat for Lyon's pentachaeta, Riverside fairy shrimp, and coastal California gnatcatcher. The Proposed Project is not located in designated critical habitat for Lyon's pentachaeta and no project elements are proposed within critical habitat for this species. The proposed subtransmission alignments that traverse designated critical habitat for Riverside fairy shrimp lack habitat for this species and lack the principal constituent elements (PCEs) for this species that are identified in the USFWS critical habitat ruling, as discussed in the Draft EIR (see Draft EIR Figure 4.4-2, page 4.4-9 and page 4.4-19). Due to the lack of habitat and PCEs, the protective provisions of the Riverside fairy shrimp critical habitat ruling do not apply to the Proposed Project.

The commenter incorrectly states that any habitat modification or harm to listed species caused by the Proposed Project will violate FESA §9. If the USFWS, in consultation with the Corps during the CWA §404 permit process, identifies the potential for "take" of federal listed species or degradation of designated critical habitat as a result of the Proposed Project they may, at their discretion, ensure compliance with FESA by one of several approaches. If impacts are considered negligible by the USFWS, they may consult with the applicant to refine a set of Applicant Proposed Measures that fully address and minimize the potential for species "take" and habitat loss. Alternately, for projects that may affect federal listed species, the USFWS will formally consult on a project and issue a Biological Opinion under FESA §7, which authorizes the "take" of listed species and/or their habitat.

The commenter asserts that the Draft EIR incorrectly concludes the absence of coastal California gnatcatcher on the Presidential Substation site, citing the 2010 Bonterra coastal California gnatcatcher survey report (cited as Bonterra, 2010a in the Draft EIR). This technical biological study characterized habitat for the coastal California gnatcatcher on and near the Presidential substation site. However, the technical report inaccurately presented the entire Humkar Parcel as the "Preferred Substation Site," which is much larger than the Presidential Substation site. The individual gnatcatcher described the Bonterra (2010a) report is more accurately described as occurring in the northwestern portion of the gnatcatcher survey area. Thus, while coastal California gnatcatcher was detected within the survey area, the sighting was still about 1,100 feet from the Presidential Substation site, as accurately presented in the Draft EIR (pp. 4.4-19

and 4.4-36). However, subsequent to circulation of the Draft EIR, coastal California gnatcatchers were identified in the project area in 2012 and this new data has been incorporated into changes to the Draft EIR in this document (Bonterra, 2012).

The commenter states that the Proposed Project site is located within designated critical habitat for the coastal California gnatcatcher and that construction and operation of the project will modify and degrade the gnatcatcher's habitat which will likely impair essential gnatcatcher behaviors. As illustrated in Draft EIR Figure 4.4-2 (page 4.4-9), the Presidential Substation site and alternative substation sites are not located in designated critical habitat for coastal California gnatcatcher; however, portions of the proposed and alternative subtransmission alignments traverse designated critical habitat. Gnatcatcher surveys performed in 2012 at the request of the USFWS and CDFG identified this species in two areas (see Response A4-3). The minor Proposed Project components that are located within designated critical habitat for the coastal California gnatcatcher will not diminish the range of this species, and proposed mitigation measures will offset any minor habitat disturbances. APM-BIO-01 requires that the applicant minimize impacts to coastal sage scrub through project design and compensate for habitat losses, and consult with the USFWS and CDFG for consistency with the ESAs. Thus, based on survey findings and protective measures presented in the Draft EIR, including habitat compensation for permanent impacts and ecological restoration for temporary impacts, as identified in Mitigation Measure 4.4-2b on pg. 4.4-36, potential impacts to coastal California gnatcatcher would be reduced to less than significant.

A15-15 The combination of APM-BIO-01 and Mitigation Measure 4.4.2b is sufficient to minimize and mitigate potential project impacts to coastal California Gnatcatcher and their habitat. The Draft EIR inadvertently referenced Mitigation Measures 4.4.2a and 4.4.2b as providing gnatcatcher protection; however, relevant gnatcatcher protection measures are only provided in Mitigation Measures 4.4.2b on pages 4.4-36 to 4.4-37. This measure requires preparation of a Restoration Plan to mitigate impacts to occupied and unoccupied coastal sage scrub habitat. The specific plan components will vary depending upon whether an overhead or overland alignment is selected, and the location of the selected routes. Thus, the specific need for and contents of the plan will not be known until the final alignment is selected. As studied and designed, the Proposed Project would impact a small amount of scrub habitat that may support listed species, including coastal California Gnatcatcher.

As suggested by the comment, the reference to Mitigation Measure 4.4-2a has been removed and Mitigation Measure 4.4.2b on page on page 4.4-36 and 4.4-37 is revised as follows to better identify mitigation requirements and performance criteria:

3.2 Agencies and Organizations Responses

- A qualified ecologist shall prepare a restoration and mitigation plan in coordination with CDFG and USFWS to mitigate for temporarily impacts to coastal sage scrub habitat with the intention of restoring habitat for coastal California gnatcatcher. The plan shall include a full description of microhabitat conditions necessary for each affected target vegetation species, seed germination and planting requirements, a description of the supplemental irrigation system, if needed to support site restoration, restoration techniques for temporarily disturbed occurrences, assessments of potential transplant and enhancement sites, success and performance criteria, and monitoring requirements, as well as measures to ensure long-term sustainability. Restoration sites shall be monitored for a period of at least three years to track mitigation success and identify needed adjustments to the restoration program. Plant survival and growth shall be recorded at the same time each year and reported to resource agencies on an annual basis using survival and percentage cover as a metric of success. Restored areas shall be considered mature when they achieve 50 percent coverage by native plant species. The mitigation plan shall apply to portions of the project alignment that support restored coastal sage scrub habitat (e.g. at the proposed subtransmission alignment). At a minimum, the mitigation plan shall provide:
 - <u>The location of mitigation sites that are selected from suitable</u> lands in the in the local project vicinity;
 - <u>A description of native vegetation to be planted or seeded and</u> <u>an estimation of the density and coverage of the final planted</u> <u>areas:</u>
 - <u>Site preparation measures that will be employed to encourage</u> vegetation establishment, including the need for supplemental irrigation, erosion control, or other measures as appropriate;
 - <u>Measures that would be employed to discourage site invasion by</u> <u>non-native species, for example, mowing, weeding, and/or</u> <u>herbicide application;</u>
 - <u>The source of plantings or seeds that are used in support of site</u> restoration, with a preference for local plant stock wherever possible;
 - <u>A schedule for maintaining and monitoring restored areas to</u> include the number of scheduled site visits, actions that will be taken on each site visit, contingency measures to respond to site degradation, need for replanting, invasion by weeds, or erosion;
 - <u>The restoration effort shall be considered successful when plant</u> <u>cover reaches 50 percent, or is at least comparable to vegetation</u> <u>cover in disturbed areas, and plants are self-sustaining without</u> <u>supplemental water for a period of at least two years.</u>

Annual monitoring reports shall be prepared to document site progress and measures that were implemented during the prior year. Reports shall be submitted to CDFG and USFWS for review and approval.

- A15-16 The commenter correctly states that the Proposed Project is located adjacent to, but outside of designated critical habitat for Lyon's pentachaeta. The USFWS designates critical habitat to include all areas deemed important to a species' survival or recovery. The Presidential Substation Site is not located within designated critical habitat for Lyon's pentachaeta and would not impact critical habitat for this species. Furthermore, no populations of Lyon's pentachaeta are documented to occur within the critical habitat unit located adjacent to the proposed Presidential Substation site. As a result of these considerations, the Proposed Project would not restrict the range or distribution of this species.
- A15-17 The commenter states that the Riverside fairy shrimp survey methodology is flawed because surveys were performed during the dry season; however, when suitable aquatic habitat (e.g., pools, puddles, and similar habitat elements) are absent from an area, wet season surveys are not needed to conclusively document species' absence. In the present case, the lack of suitable aquatic habitat was readily apparent during dry season surveys, and the findings were corroborated by ESA surveys during the wet season. As documented in the Bonterra (2010b) report, the proposed subtransmission alignment lacks pools or other waterponding depressions that would support this species, thus, suitable habitat for Riverside fairy shrimp was deemed absent from the project area. Independent field surveys to corroborate Bonterra survey findings were performed on February 10, 2009 by ESA fairy shrimp specialist Brian Pittman, CWB, as presented on Draft EIR page 4.4-1. The Bonterra report correctly cited the lack of suitable pools in the project area in citing species' absence. The sloped topography and disturbed nature of the subtransmission alignments and substation sites are the key reasons that fairy shrimp habitat is absent from the project area.
- A15-18 The relatively small substation site is not considered high quality golden eagle foraging habitat. The substation site and alignments lack suitable eagle roosting trees and the site is located immediately adjacent to existing residential development. Moreover, golden eagles do not forage in areas with dense sage scrub cover. Thus, no impacts are anticipated to golden eagle foraging habitat.
- A15-19 The comment requests specific clarification of the Draft EIR statement on pg. 4.4-19 that Swainson's hawk "is not expected to nest within the study area because it is outside this species' breeding range." In California, the Swainson's hawk commonly nests in the Central Valley and Great Basin bioregions. No Swainson's hawk nesting has been reported in Ventura County and the nearest described nesting occurrence is from the Antelope Valley in Los Angeles County, about 35 miles east of the Proposed Project. Thus, Swainson's hawk nesting is not expected near the Proposed Project during construction.

3.2 Agencies and Organizations Responses

- A15-20 The silvery legless lizard has not been documented within five miles of the Proposed Project and is not expected in the project area. Based on the lack of suitable habitat in the project area and absence of legless lizard populations within a 5 mile study area, this species is considered absent from the project area and thus was not discussed in Draft EIR.
- A15-21 The nearest CNDDB-documented coastal cactus wren nesting sites are located greater than 50 miles south of the Proposed Project site, with no nesting documented in Ventura or Los Angeles counties. The distinctive nest of the coastal cactus wren was not detected in the project area during focused surveys. While both State and federal laws protect active cactus wren nests, non-breeding cactus wren movement and foraging areas are not specifically protected by State or federal statutes. Following a review of this species' breeding distribution and the absence of breeding on the site, the inclusion of cactus wren in the Draft EIR is not required to avoid impacts to this species. If work is proposed during the nesting season, Mitigation Measure 4.4-3 requires advance surveys for nesting birds in the project area and protects all birds that could potentially nest in or near the project area.
- A15-22 The commenter suggests that Mitigation Measure 4.3-1 does not do enough to reduce NO_x emissions and additional measures should be suggested to reduce the short-term significant environmental impact to a less-than-significant level. Implementation of Mitigation Measure 4.3-1 would minimize the significant impact by requiring NO_x reductions of 20 percent compared to the most recent equipment and vehicle fleets in the State through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options.

Many California air districts, including the San Joaquin Valley Air Pollution Control District, Sacramento Metropolitan Air Quality Management District, Bay Area Air Quality Management District, and the Feather River Air Quality Management District, recommend a 20 percent reduction in construction-related NOx for feasible CEQA mitigation, while at the same time offering flexibility on how to achieve the required emission reductions. The CPUC is not aware of a California air district that recommends CEQA mitigation to develop a plan to reduce construction-related NOx emissions by more than 20 percent compared to the most recent equipment and vehicle fleets in the State, suggesting that reductions of more than 20 percent NOx may not be feasible. It is the CPUC's opinion that Mitigation Measure 4.3-1 represents adequate feasible measures to minimize significant adverse impacts, and justification for additional measures has not been demonstrated by the commenter.

It is also worth noting that the Ventura County Air Pollution Control District (VCAPCD), the local air quality regulatory authority in the project area, has stated

that implementation and adherence to air quality mitigation measures identified in the Draft EIR would reduce ozone precursor emissions, and no further air quality mitigation measures are needed (see VCAPCD Comment A.7-2).

- A15-23 The commenter states that the Draft EIR must substantiate its assertion that the implementation of Mitigation Measure 4.3-2 would reduce the environmental impact to less than significant and the Draft EIR fails to provide data to corroborate its conclusion. However, as described on Draft EIR page 4.3-14, the *Ventura County Air Quality Assessment Guidelines* recommend that lead agencies assess the significance of dust-related impacts by assessing whether the project includes measures to minimize fugitive dust, especially during grading and excavation operations, rather than quantifying dust emissions for comparison to a quantitative significance threshold. Mitigation Measure 4.3-2 would reduce construction-related fugitive dust emissions by implementing VCAPCD adopted dust control measures. The Draft EIR's conclusion that fugitive dust emissions would be reduced to a less-than-significant level by those measures is corroborated by the VCAPCD's guidance for the qualitative assessment of fugitive dust emissions.
- A15-24 The commenter asserts that the air emissions associated with System Alternative B would be substantially less that those associated with the Proposed Project. System Alternative B was removed from the Final EIR and the commenter is directed to Master Response 1, *Alternatives* in Section 3.1.1 for further information.
- A15-25 The commenter expresses the opinion that the Draft EIR fails to disclose the Proposed Project's conflicts with applicable local regulations related to aesthetics, and other aesthetic impacts including those pertaining to natural areas, equestrian centers, community farms, and residential communities. As discussed in detail in Section 4.10, *Land Use and Planning* (page 4.10-14), "No local land use plans, policies or regulations would apply to the Proposed Project because, pursuant to General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the Proposed Project. Consequently, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project." Nevertheless, Section 4.1, *Aesthetics*, provides a description of state and local regulations pertaining to aesthetic issues, for informational purposes. The commenter is referred to the *Regulatory Context* section found on Draft EIR pages 4.1-30 to 4.1-35.

Aesthetic impacts to park and recreation areas including open space areas, local and regional parks, equestrian centers, and Underwood Family Farms, are analyzed primarily under Impact 4.1-8, The commenter is specifically referred to Draft EIR pages 4.1-58 to 4.1-59. Impacts to these locations are also captured in the analyses for Impacts 4.1-2 through Impact 4.1-7.

3.2 Agencies and Organizations Responses

A15-26 Phase I (survey) and Phase II (subsurface evaluation) cultural resources studies were conducted by qualified personnel, as described in the section "Methods and Results" in Draft EIR Section 4.5, Cultural Resources, page. 4.5-5. All accessible portions of the Proposed Project were subject to archaeological survey. As discussed on page 4.5-7, the project area was generally characterized as having low ground visibility, meaning that some of the ground surface was obscured by vegetation, pavement, or other ground cover. The Draft EIR acknowledges that the project may have a significant impact on buried or otherwise obscured cultural resources and has provided Mitigation Measures 4.5-2a, 4.5-2b, and 4.5-4, which would mitigate impacts to a less-than-significant level. Mitigation Measure 4.5-2a requires archaeological and Native American monitors to be present during project-related ground disturbance. Mitigation Measure 4.5-2b provides contingency measures for the accidental discovery of cultural resources during project implementation. Mitigation Measure 4.5-4 provides contingency measures for the discovery of human remains during project implementation.

> The commenter further states that the Draft EIR does not fully analyze impacts to two sites that are eligible for the California Register. Impacts to archaeological resources CA-VEN-744 and CA-VEN-1571 are evaluated on pages 4.5-19 through 4.5-20 of Section 4.5 of the Draft EIR. As stated in the Draft EIR, site CA-VEN-1571 was subject to archaeological testing in 2010, resulting in the determination that the portion of the site within the project area did not retain integrity and had little data potential, and therefore did not contribute to the site's eligibility for listing in the California Register. Therefore, implementation of the Proposed Project would not impact those portions of site CA-VEN-1571 that are known to contribute to its eligibility. Any impacts to the site resulting from accidental discovery would be addressed by the implementation of Mitigation Measure 4.5-1, in conjunction with APM CUL-1, which would create an archaeological treatment and discovery plan that would define appropriate actions to lessen or avoid impacts to site CA-VEN-1571, as well as by APMs CUL-5 through CUL-7, which would create an environmentally sensitive area (ESA) around site CA-VEN-1571 and require Native American and archaeological monitoring during construction.

In order to further clarify the procedures that would be followed in the event of accidental discovery of potentially significant resources at site CA-VEN-1571, Mitigation Measure 4.5-1 on Page 4.5-20 has been clarified to read:

Mitigation Measure 4.5-1: A qualified archaeologist shall be retained to serve as lead archaeologist and shall prepare <u>and implement</u> a Cultural Resources Treatment and Discovery Plan prior to issuance of a grading permit. The Cultural Resources Treatment and Discovery Plan shall address the implementation of protective measures (as detailed in APMs CUL-2 through CUL-5), archaeological monitoring, and procedures for discovery of cultural resources. The Cultural Resources Treatment and

Discovery Plan shall provide detailed plans for data recovery for those components of eligible resource CA-VEN-744 that cannot be avoided during project implementation, and for the capping of those portions of site CA-VEN-744 that may be indirectly impacted. The plan shall also address the creation of Environmentally Sensitive Areas within sites CA-VEN-744 and CA-VEN-1571. The Cultural Resources Treatment and Discovery Plan shall also state that if significant portions of either site are encountered during project implementation outside of protected areas, Proposed Project redesign should be considered in order to avoid impacts to significant areas. If avoidance is infeasible, then data recovery shall be implemented.

The Cultural Resources Treatment and Discovery Plan shall detail the duration and locations of archaeological and Native American monitoring during project implementation and shall provide for discretionary modifications to monitoring procedures by the lead archaeologist based on observations made by the monitor as construction progresses. The Cultural Resources Treatment and Discovery Plan shall also create measures for the accidental discovery of cultural resources during project implementation. Avoidance shall be the preferred means of avoiding impacts to cultural resources. The Cultural Resources Treatment and Discovery Plan shall set forth detailed procedures for data recovery in the event that resources cannot be avoided.

The nature of impacts to site CA-VEN-744 has been further clarified by the addition of text in the discussion of Impact 4.5.1, on page 4.5-19 of the Draft EIR:

However, it is possible that Proposed Project construction could uncover previously unknown intact archaeological deposits of site CA-VEN-1571. Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to lessen or avoid <u>additional</u> impacts to site CA-VEN-1571. APMs CUL-5 through CUL-7 would create an environmentally sensitive area (ESA) around site CA-VEN-1571 and require Native American and archaeological monitoring during construction within and in the vicinity of the site. With this mitigation measures and APMs incorporated, impacts to site CA-VEN-1571 would be less than significant.

Project construction could potentially impact site CA-VEN-744. The site was subject to archaeological testing in 2010 and was found to be eligible for the California Register <u>of Historical Resources</u>, and therefore a historical resource under CEQA. Impacts to the site could result from excavation during installation of new TSPs, the movement of heavy machinery and vehicles around the site during construction, and continued use of vehicles around the site along access roads and during future maintenance activities.

3.2 Agencies and Organizations Responses

Although much of the site will be avoided during project implementation, total avoidance of site CA-VEN-744 would be infeasible. As part of the Proposed Project, an existing TSP within site boundaries would be removed, and a new TSP would be installed within the site boundaries. The new TSP would not be installed within the footprint of the existing TSP because the existing conductor needs to remain suspended on the existing TSP during installation of the new pole. Total avoidance of impacts to site CA-VEN-744 could only be achieved by placing the proposed new TSP outside of site boundaries and thus having the existing conductor span site CA-VEN-744. Due to the existing topography where the archeological site is located, the existing subtransmission facilities, and the dimensions of the site, spanning the site was deemed impractical due to engineering constraints.

However, impacts to the majority of site CA-VEN-744 would be avoided through site capping and avoidance, and residual impacts would be mitigated to a less-than-significant level. Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to mitigate or avoid direct impacts to site CA-VEN-744. In order to avoid impacts from the use of heavy machinery and vehicles around the site and from the continued use of vehicles along access roads during future maintenance activities, the majority of the site would be permanently capped, as specified in APMs CUL-2 through CUL-4 and Mitigation Measure 4.5-1. These measures would require that SCE permanently cap other portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction and maintenance; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP.

SCE has proposed APM CUL-1, which would create a treatment plan for those portions of the site that cannot be avoided during Proposed Project implementation. Impacts to those portions of the site where impacts cannot be avoided through capping or avoidance would be mitigated by the implementation of data recovery. The Cultural Resources Treatment and Discovery Plan would include a systematic data recovery plan to be implemented within the footprint where the new TSP would be installed, in order to mitigate impacts to that portion of the site. SCE has also proposed APMs CUL-2 through CUL-4, which would permanently cap other portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP. APMs CUL-5 through CUL-7 would create an environmentally sensitive area around site CA-VEN-744 and require Native American and archaeological monitoring during construction within and in the vicinity of the site. With the incorporation of Mitigation Measure 4.5-1 and these APMs, significant impacts to site CA-VEN-744 would be mitigated to a less-than-significant level.

- A15-27 Ventura County Policy 1.8.2(2), which applies to "discretionary development," is not applicable to the Proposed Project. Under CPUC's General Order No. 131-D, a local jurisdiction does not have discretionary permitting authority over the Proposed Project. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- A15-28 Contact with the NAHC and Native American individuals recommended by the NAHC was conducted in July, 2008, in order to solicit any comments or concerns that they might have had about the Proposed Project. Evidence of Native American contact and coordination is provided in the section *Methods and Results* of Section 4.5 of the Draft EIR, *Cultural Resources* (pages 4.5-5 through 4.5-9). Although not specifically noted in the Draft EIR, a Chumash Native American monitor was present at all phases of the archaeological subsurface testing conducted at sites CA-VEN-744 and CA-VEN-1571. Also see Response A15-27.
- A15-29 The commenter contends that the Draft EIR does not disclose nighttime noiserelated impacts. As discussed in Chapter 2, *Project Description*, construction activities are proposed for daylight hours (i.e., from 7 a.m. to 5 p.m.), Monday through Friday; however, SCE may determine that different hours or days of construction are necessary. Therefore, it is assumed that nighttime construction activities would occur and the Draft EIR discloses that nighttime construction noise levels would result in a significant unavoidable impact relative to Ventura County's construction noise level threshold, but would result in a less than significant impact with mitigation relative to reducing the associated annoyance (see Draft EIR pages 4.11-15 and 4.11-20).

The commenter suggests that the Draft EIR's failure to require mitigation that limits construction noise to the hours of 9:00 a.m. to 5:00 p.m. is a violation of CEQA; however, no clear justification is provided to support the suggested construction noise time-of-day restriction, which is considerably more stringent than the municipal code noise restrictions in the area (see Draft EIR pages 4.11-10 and 4.11-11). It should also be noted that the suggested mitigation would not be effective in reducing the significant and unavoidable impact related to the Ventura County construction noise level threshold criteria because the daytime criteria would also be exceeded.

The commenter mischaracterizes the Draft EIR's analysis related to Mitigation Measures 4.11-1a and 4.11-1b. Disclosing the fact that it is not possible to firmly

substantiate that the measures would achieve noise reductions of more than 5 dBA is not an admission that the measures are deficient. In fact, several components of the mitigation measures would not reduce nighttime construction noise, but would reduce the annoyance that would be associated with loud construction activities. For example, Mitigation Measure 4.11-1b requires SCE to offer temporary relocation for residents within 200 feet of nighttime construction activities. This would not reduce the construction noise level, but would reduce the nighttime noise nuisance impact to the nearest residences.

- A15-30 The commenter appears to argue that the Draft EIR conclusions related to cumulative greenhouse gas (GHG) emissions impacts are unfounded because the Draft EIR does not account for the GHG emissions produced by the facilities that generate the electrical power that would flow through Presidential Substation. However, the Proposed Project would not include any new electricity generation and would consume a negligible amount of electricity generated by existing, planned, or reasonably foreseeable future power plants. Because project-related GHG emissions impacts are inherently cumulative in nature (i.e., no individual project on its own could affect climate change), the Draft EIR cumulative impact conclusion is based on the project-specific incremental GHG emissions impact, which indicates that the Proposed Project would not be cumulatively considerable with respect to GHG emissions because it would not conflict with the State's GHG reduction goals.
- A15-31 While climate change itself may globally threaten ecosystems and wildlife movement corridors, development of the proposed 5.4-acre substation site and associated subtransmission facilities would not exacerbate the effects of climate change on local biological resources or reduce the ability of the local environment to respond to long-term climate changes. As discussed in Response A6-3 and A15-12, the Proposed Project would not result in significant impacts to wildlife movement corridors.
- A15-32 See Response A15-31.
- A15-33 The commenter expresses the opinion that the Draft EIR fails to adequately disclose and analyze the Proposed Project's impacts and conflicts with applicable land use laws and regulations, including the City of Thousand Oaks zoning ordinance, the Ventura County General Plan, the City of Thousand Oaks General Plan, and the City of Simi Valley General Plan. The CEQA checklist requires a lead agency to evaluate whether a project would "conflict with any applicable land use plan, policy, or regulation of *an agency with jurisdiction over the project* [emphasis added]...adopted for the purpose of avoiding or mitigating an environmental effect." Neither the County of Ventura nor the cities of Thousand Oaks and Simi Valley have jurisdiction over the Proposed Project. As stated in the Draft EIR, Section 4.10, *Land Use and Planning* (page 4.10-3, second paragraph

from the bottom): "The California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of the Proposed Project and alternatives because it authorizes the construction, operation, and maintenance of investor-owned public utility facilities. Although such projects are exempt from local land use and zoning regulations and discretionary permitting (i.e., they would not require any land use approval that would involve a discretionary decision to be made by a local agency such as a planning commission, city council, or county board of supervisors), General Order No. 131-D, Section XIV.B requires that in locating a project "the public utility shall consult with local agencies regarding land use matters." The public utility is required to obtain any required non-discretionary local permits.

Although the Proposed Project would be exempt from local land use and zoning regulations and discretionary permitting, the CPUC consulted with local agencies regarding land use matters potentially affected by the Proposed Project, and the Draft EIR included a consistency analysis for informational purposes. The Draft EIR concluded that the Proposed Project would not conflict with the following land use plans, policies and regulations: Ventura County General Plan, Ventura County Tierra Rejada Greenbelt and SOAR Ordinance, Ventura County Non-Coastal Zoning Ordinance, and City of Thousand Oaks General Plan (Draft EIR pages 4.10-14 to 4.10-15). The Draft EIR also concluded that if the City of Thousand Oaks Zoning ordinance applied to the Proposed Project, a conflict with the Protected Ridgeline Overlay Zone would result (see page 4.10-15).

- A15-34 See Response A15-33.
- A15-35 See Response A15-33.
- A15-36 The commenter expresses the opinion that the Draft EIR fails to describe the Proposed Project's conflict and impacts with easements, franchise agreements, or encroachment permits. The commenter is referred to Draft EIR Section 2.6, *Rights-of-Way Requirements*, for a description of existing and new easements required for construction of the Proposed Project. The Draft EIR discloses required permits and approvals in Table 2-10, *Summary of Permit Requirements*, including encroachment permits necessary from Caltrans, the City of Thousand Oaks, the City of Simi Valley, and Ventura County. The vast majority of project activities would take place within existing ROW. While some overhang easements may be needed, the EIR assessed environment impacts of land needed for the Proposed Project.

Potential conflicts with easements and permits would not be analyzed under Draft EIR Section 4.10, *Land Use and Planning*, as they would not fall under any of the three significance criteria (Draft EIR page 4.10-12): "Based on CEQA Guidelines Appendix G, a project would cause adverse impacts related to land use if it would:

- a) Physically divide an established community;
- b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan."
- A15-37 The commenter states that the Draft EIR fails to adequately disclose and analyze potential growth inducing impacts of the Proposed Project. The discussion found in Section 6.1 of the Draft EIR correctly cites CEQA Guidelines § 15126.2(d) requirements of an EIR to disclose and analyze growth inducing impacts of the Proposed Project, which include (1) the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment, and (2) whether the Proposed Project would remove obstacles to population growth. In Section 6.1.1, the Draft EIR discusses direct and indirect economic and population growth caused by project-related employment, and in Section 6.1.2 it discusses growth related to the provision of additional electric power, which could be considered an obstacle to population growth. In this respect, the Draft EIR has considered and disclosed information required by the CEQA Guidelines.

The commenter's central point is that the Draft EIR is flawed because of an incomplete disclosure of electrical need within the Electrical Needs Area (ENA) and the Draft EIR assumes that the Proposed Project would "accommodate existing and planned electrical load growth, rather than to induce growth" a statement that the commenter states has no "basis is reality." The commenter is incorrect in this assertion. As stated in the SCE Proponents Environmental Assessment, SCE's purpose for this project is reliability of the electric grid (SCE, 2008):

"Project Purpose

The purpose of the Proposed Project is to ensure the availability of safe and reliable electric service to meet customer electrical demand in the Electrical Needs Area. Under the rules, guidelines, and regulations of the Federal Energy Regulatory Commission (FERC), the North American Electric Reliability Corporation (NERC), the Western Electricity Coordinating Council (WECC), and the California Public Utilities Commission (CPUC), electrical transmission, subtransmission, and distribution systems must have sufficient capacity to maintain safe, reliable, and adequate service to customers. System safety and reliability must be maintained under normal and abnormal conditions. Abnormal conditions result from equipment or line failures, maintenance outages, or outages that cannot be predicted or controlled due to weather, earthquakes, traffic accidents, and other unforeseeable events."

As a provider of electricity, SCE must provide electric power to meet demand. To this end they have to monitor growth in demand, predict future needs, plan for this growth, and implement changes to the grid to meet this predicted future demand. Nothing in that process encourages growth, and is the reason that the Draft EIR concludes on page 6-2:

"The provision of electricity is generally not considered an obstacle to growth nor does the availability of electrical capacity by itself normally ensure or encourage growth within a particular area."

The demand for electricity is a result of, not a precursor to, development in the region which generally is a result of local plans and policies of local agencies within an area. Although the Proposed Project would increase the reliability with which electricity is made available (which is SCE's purpose for this Proposed Project), the Proposed Project does not provide a new source of electricity. Rather, it supplies electricity produced and provided by other facilities.

- A15-38 The commenter makes a broad summary comment that the Draft EIR fails to adequately disclose and analyze mitigation measures. The response to this comment and the commenter's specific concerns are addressed in Responses A15-39 through A15-41 below.
- A15-39 The commenter is referred Response A15-15, and subsequent revisions to Mitigation Measure 4.4.2b.
- A15-40 The commenter states that Mitigation Measure 4.5-1 improperly defers the disclosure and analysis of impacts to cultural resources. Please see response A15-26 above for discussion of Mitigation Measure 4.5-1 and for additional information regarding impacts to significant cultural resources.

Impacts to paleontological resources are analyzed on page 4.5-22 of the Draft EIR. As a result of the paleontological records check and field survey performed for the Proposed Project (Rockman et al., 2009), four paleontologically sensitive formations were identified within the area of the Proposed Project and alternatives, as well as an exposure of fossiliferous sediments within the Project Area. Because of this, the Draft EIR identified potentially significant impacts to paleontological resources and provided Mitigation Measure 4.5-3, which would create a monitoring plan and require paleontological monitoring during construction of the Project within paleontologically sensitive areas, in order to mitigate these impacts. During Project construction, implementation of this monitoring plan would protect sensitive formations either by avoiding them or, should they be encountered, they would be assessed by qualified monitors and properly protected or avoided. 3.2 Agencies and Organizations Responses

A15-41 The commenter indicates that the Construction Noise Reduction Plan that would be required pursuant to Mitigation Measure 4.11-1a requires inadequate commitments to performance standards; however, Mitigation Measure 4.11-1a identifies specific measures that would be required to be implemented to limit daytime construction noise impacts. Therefore, implementation of Mitigation Measure 4.11-1a does not constitute deferral of mitigation.

The commenter also criticizes the measure for not identifying the "types of distance for physical separation" that would be required; however, due to the right-of-way constraints and linear nature that would be associated with the subtransmission line and distribution/fiber installation, it would not be practical to identify specific distance(s) for physical separation. Therefore, it is appropriate for the measure to require construction activity to maximize physical separation as far as practicable.

The commenter also contends that the Draft EIR does not include disclosure of how barriers would address the impacts to nearby sensitive receptors. The noise barriers would reduce noise levels at nearby residences; however, as stated on Draft EIR page 4.11-15, it not possible to firmly substantiate that implementation of Mitigation Measure 4.11-1a would achieve noise reductions of more than 5 dBA.

Finally, the commenter indicates that the Traffic Management Plan, required by Mitigation Measure 4.15-1b, in the Draft EIR is deficient in its means to disclose and analyze impacts due to construction and operations and the mitigation to address those impacts; however, the commenter provides no information to support this claim, and no detailed response is possible. Potential impacts due to project construction and operations are disclosed and analyzed under Impact 4.15-1 (pages 4.15-9 through 4.15-12 of the Draft EIR). For discussion related to nighttime construction impacts, refer to Response A15-29 and for discussion of construction-related impacts on wildlife, refer to Draft EIR Section 4.4, *Biological Resources*.

- A15-42 See Responses A5-1 and A5-6. Regarding electrical demand see Master Response 1, *Alternatives* in Section 3.1.1. For discussion on the ENA, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- A15-43 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-44 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-45 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-46 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-47 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-48 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-49 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-50 This is a summary comment of the commenter's major concerns. For comments related to biology, see Responses A15-13 through A15-21. For comments related to air quality, see Responses A15-22 through A15-24. For comments related to aesthetics, see Responses A15-25 through A15-21. See Responses A5-1 and A5-6 for responses on the range of alternatives considered by the Draft EIR. Also see Master Response 1, *Alternatives* in Section 3.1.1.
- A15-51 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-52 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-53 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-54 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-55 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-56 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-57 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-58 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-59 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-60 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-61 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-62 See Master Response 1, *Alternatives* in Section 3.1.1.
- A15-63 See Master Response 1, *Alternatives* in Section 3.1.1.

From: Sent: To: Cc: Subject: Attachments:	Chuck Cronin [crcronin879@sbcglobal.net] Tuesday, November 15, 2011 12:09 PM Presidential Substation Project; jbm@cpuc.ca.gov Chuck Cronin Draft EIR Comments Presidential Substation Imcomplete alternatives.doc; CEQA amended fo GHG and thoughts on Oxnard.doc; DEIR cover letteer sTTop.doc; TurnA1011015_082311_VOL21.PDF; TURNA1011015 _TURN_Brief_FINAL_092611.pdf; High res chart with Upgrades Rotated.JPG
Follow Up Flag:	Follow up
Flag Status:	Flagged

Ms. Mosley, attached are the comments from sTTop on the DEIR for the Presidential Substation. You consideration of the comments is appreciated.

I am also submitting the TURN information on GRC2012 in which it is clear that the SCE work papers identify that the Presidential Substation is Load Growth not reliability. I have also attached a graph of load growth using the non-confidential information supplied by SCE showing that the Load growth is dropping not increasing, this is likely due to off loading and other Energy Efficiency actions. We are requesting that the "known" steps taken by those in the ENA be considered as an "implemented alternative" much in the same way a transformer upgrade would count toward the need. Our estimate is that about 12MW of demand has been off loaded, combined with the possible standard upgrades of the Protero and Royal substations and the shifting of needs to Oak Park substation constitutes a valid alternative not considered in the DEIR.

Chuck Cronin Co-Founder sTTop

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Ms. Lynn Mosley Energy Division Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954

Via Fax (415) 896-0332

Re: Presidential Substation Draft Environmental Report

Dear Ms. Mosley,

The sTTop organization supports the Environmentally Superior Alternative found in the Draft Environmental Report, DEIR., that calls for the upgrading of the substations to meet the project objectives. The use of upgrades, either standard 28MVA or larger transformers would appear to meet the needs of the Electrical Needs Area for some time to come based on realistic demand projections. As stated in the DEIR workshop meeting on Oct 13th the upgrading of non-standard transformers was found to be feasible by the electrical engineers at the ESA. SCE has changed the standard size of its transformers over time from 20 MVA to 22.6 MVA to 25 MVA and now 28 MVA.

The second best Environmentally Superior Alternative was determined to be the modification of the Presidential Substation proposed by Southern California Edison with a modification in Alignment to underground a portion of the 66kv subtransmission lines from the Substation location to the intersection of Sunset Valley Rd and Read Rd. This option Alignment 3 should be discarded in favor of Alignment 4 due to the aesthetic impacts on the Tierra Rejeda Valley. Alignment 3 would put high voltage subtransmission lines on every road in what was to be Open Space as defined by SOAR and a buffer zone for the three cities of Thousand Oaks, Moorpark and Simi Valley. The three cities have repeatedly requested that the lines be undergrounded for aesthetic reasons.

Although we compliment the DEIR team on developing Environmental Superior Alternatives in response to concerns of the Cities, Businesses and Residents sTTop maintains that the DEIR has several issues and omission that need to be addressed. This comment is not a criticism of the diligent effort rather it is the norm when a Draft EIR is issued. We request that the Draft EIR be resubmitted with a complete analysis of the following alternatives not completely analyzed in the DEIR:

- 1. No Project Alternative,
- 2. Distributed Generation based SCE's Commercial Rooftop Solar PV Program,
- 3. Demand Management and Energy Efficiency based on SCE's Whole House Program in Palm Desert,
- 4. Substation cited on a for sale and disturbed site at RT23 and Tierra Rejeda (sw corner),
- 5. Standard Upgrades combined with known consumer driven impacts since 2008,
- 6. Expansion of the ENA to include Oak Park, Newbury and Santa Susana Substation,
- 7. Rolling or shifting of electrical needs to Oak Park, Newbury and Santa Susana Substation, and
- 8. Impact of the known impact of Distributed Generation, Energy Efficiency and Demand Management actions by Government, Business and Residential entities.

The DEIR is incomplete and does not provide the CPUC or the Public with the full impact of the project in that it does not address the full range of impacts. We ask that the DEIR be expanded to cover the full range of impacts including:

- 1. The consideration of local and regional Greenhouse Gas reduction plans, (Oxnard goal to reduce GHG from the local power plants that serve the Electrical Needs Area),
- 2. The validity of easements, franchise and encroachment agreements along the SCE Proposed Alignment,
- 3. The EMF approach is lacking an approach for homes that are above the grade and negate the height the mitigation approach,
- 4. The impact on farmland due to the runoff of construction water and permanent vaults located in farmland,
- 5. The environment impact based on the exact location of the poles and vaults,
- 6. The impact on residential waste treatment, namely septic systems, is not addressed,
- 7. The impact on traffic safety along narrow roads of Sunset Valley and Read Rd has not been considered,
- 8. The cumulative impact of noise was not measured for the homes that are on Read Rd and Maya Pradera Rd.,
- Iaya A16-4
- 9. The DEIR scope was artificially narrowed to exclude economic impact on residents and businesses,
- 10. The DEIR scope did not consider the environmental impact on "new" easements as they are yet to be defined within the DEIR,
- 11. The CPUC has not asked SCE to update the project objectives given that three years have passed,
- 12. The property owners have been clear that they oppose any easements so the required condemnation of private property by the CPUC is not discussed in the DEIR,
- 13. The economic impact of the taking of land and the location of high voltage lines in the front yard of residences,
- 14. Projects that are known that have contributed to meet the demand of electricity within the Electrical Needs Area, and
- 15. The impact the local land uses created by the SOAR referendum.

The items are covered in more detail in the attached documentation. We hope that you will give careful consideration to the items previously excluded in the DEIR so that all alternatives and issues relevant to the project are fully considered and communicated to the CPUC and the Public.

Sincerely.

Charles Cronin Co-Founder sTTop

DEIR Comments – Incomplete or Missing Alternatives

The Draft Environmental Impact Report, DEIR, is to thoroughly discuss the Proposed Project and the Alternatives that may or may not be Environmentally Superior. The DEIR as issued provides an excellent Alternative, the Environmentally Superior Alternative, which calls for the upgrading of the Three Substations within the narrowly defined Electrical Needs Area with larger Transformers, than the current 28MVA units. While we are very supportive of this Alternative we are concerned that many other Alternatives that have little or no Environmental Impact were not fully considered in the DEIR.

Consumer Driven Alternative

The lack of full consideration for Distributed Generation Alternative via Solar, the Energy Efficiency Alternative and the Demand Management Alternative, "Consumer Driven Alternatives" were dismissed as voluntary. The rationale for dismissing these consumer driven Alternatives is that they rely on future actions however the past steps taken by consumers, governments and businesses since 2008 are known and cannot be dismissed as future actions. Therefore the actions taken under Distributed Energy, Energy Efficiency and Demand Management since the issuance of the PEA in 2008 constitute an implemented Consumer Driven Alternatives that should be evaluated separately and in conjunction with other Alternatives to meet the project objectives.

SCE maintains and can provide the reduction in demand or the off-loading of demand on Distributed Energy and Demand Management through the various programs that it manages for incentives and rebates. The impact for Energy Efficiency Alternative is more difficult since it is the result of all actions taken including but not limited to upgrades to buildings, replacement of appliances and use of FT light bulbs. Given the variety and individual choices that are made by consumers, governments and businesses the only method by which to measure the total effect of these Consumer Driven Alternatives is to monitor the reduction in peak demand within the Electrical Needs Area, ENA. This method also provides for the true impact versus the theoretical impact from nameplate ratings.

The impact of the combined Consumer Driven Alternatives is estimated to be 40 MVA since 2008 based on the drop in demand as of 2011, after adjustment for the 'departed load" of 3%, or 10 MVA, provided by SCE in GRC2012 Load Planning testimony. The past actions taken by consumers, businesses and government totaling the 40MVA should be considered the amount of Consumer Implemented Alternatives that has gone into effect since the PEA was issued in 2008. This Alternative should be combined with other Alternatives such as System Alternative A, System Alternative B and other Alternatives that do not require a substation to meet the project objectives.

A16-6

DEIR Comments – Incomplete or Missing Alternatives

Load Shifting or Load Balancing Alternative

The DEIR should also have considered the Alternative of load balancing or load shifting to neighboring substations such as Oak Park and Newbury, which operate within the network of Moorpark Substation. These two substations have or will receive significant upgrades since the issuance of the PEA in 2008. This "change in circumstance" requires that the PEA be re-issued or that a similar Alternative be developed that takes into account the projects at the Oak park and Newbury substations. SCE has maintained that load balancing between these substations has been used in the past, (see SCE response to Protests to the PEA) and load balancing is called for in SCE's Load Planning process, (see GRC2012 testimony). There is no discussion of the option, feasibility or availability to load balancing with the neighboring Substations as called for in SCE's Load Growth planning process. The fact that the three substations within the narrowly defined Electrical Needs Area are already connected with Oak Park and Newbury and are in close proximity to Thousand Oaks and Potreo Substations, makes this Alternative very feasible.

This Alternative would be called for under the CEQA GHG provision since it would eliminate the need to build a substation and the associated GHG emissions for that project.

In addition, this Alternative, when fully discussed, would offer the lead agency, the CPUC, the option to evaluate a second Alternative with no or limited Environmental Impact as is found in the Environmentally Superior Alternative.

Distributed Generation-Commercial Solar Rooftops

The DEIR does not fully evaluate the use of Distributed Energy, namely solar PV, as an Alternative even though it would result in little if no environmental impact and be Environmentally Superior to the Proposed Project. The rationale for this Alternative is overwhelming:

1. The Thousand Oaks Substation that is at capacity is surrounded by several large shopping malls, commercial buildings and large 'big box" stores that have available rooftops.

2. SCE Distributed Energy Interconnect map shows over 30 MW of interconnect available within close proximity to the narrowly defined electrical needs area.

3. The majority of Solar PV installations on the commercial rooftops would be used onsite and not require distribution to the end user of the electricity generated

4. The solar index of Simi Valley and Thousand Oaks equals or exceeds that of Riverside and San Bernardino Counties where SCE has focused its Commercial Rooftop program.

A16-8

DEIR Comments – Incomplete or Missing Alternatives

5. The Cities, Businesses and Residents of Thousand Oaks and Simi Valley have been identified as leading proponents and implementers of Solar PV in the State of California.
6. There is over 50 MW of Solar PV projects within the Cities of Thousand Oaks and Simi Valley that were registered with the California Solar Initiative and later dropped. The primary reason is the difficult economic circumstances that impacted the self-funding necessary for the projects.

7. SCE has CPUC approval to implement 500 MW of Solar of which 90% is for the Commercial Rooftop Program. The implementation of the program has been slower than expected due to the restrictive requirements on roof size, building age and other criteria. The cost of solar PV panels has declined substantially since the program was approved by the CPUC and more acreage can be built out for the same cost. Therefore, SCE has the funds already allocated to build out the rooftop solar within the Electrical Needs Area. If SCE provided the Solar PV under a Power Purchased Agreement to each roof owner or similar type of arrangement, the economic boundaries to the rooftop owner would be minimized. If it offered the incentive to rent the roof as it does under the Rooftop program there would be significant interest in with Building Owners.

8. There are several examples of successful implementations already in the Electrical Needs Area such as Macy's stores, Hilltop Canyon Treatment Plant and other Governmental Buildings.

9. The cost of Solar PV panels has dropped substantially and the cost of funds has also dropped making it possible to reduce the lifetime costs of Solar PV programs. The current cost of the Proposed Presidential Substation is roughly \$50 million and would provide for the implementation of 20 MW, a significant portion would be in the Thousand Oaks Substation area. This would have the impact of directly off-loading demand directly to the commercial centers that are connected to the Thousand Oaks substation.

10. SCE has a pending settlement on the GRC 2012 with Votesolar that requires SCE to perform an RFP for a Solar PV project as an alternative to a substation project. Given the interconnect availability, the large number of commercial sites, the proven success of past solar projects, the support of the community, the level of submitted solar projects and the limited number of Environmentally Superior Alternatives the Presidential Substation would appear to be a logic place for the RFP.

Therefore we ask that the DEIR perform a full evaluation of Distributed Generation Alternative based on commercial rooftop solar, funded by SCE's current rooftop program. This process can be done under the RFP process as defined in the pending settlement in the GRC 2012 between SCE and VoteSolar.

A workplan for the development of the RFP, selection of the sites and implementation of the various projects is available and will be provided to the CPUC or its consultants upon request.

A16-9

CEQA Green House Gas Requirements "GHG"

The CEQA Regulations and Guidelines were recently updated in response to California state regulations including but not limited to AB32. The impact of the changes now require that CEQA consider GHG Emission reduction plans, the Conservation of Energy and the Mitigation of GHG Emissions in evaluating any project. This evaluation is to consider lifetime effects of any project.

GHG Emission Plans

The modifications included the requirement to consider GHG plans in the analysis of a project including "any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans." The Proposed Project and any Alternative involving the connectivity to the Moorpark Substation will increase the reliance on the electricity generated in Oxnard at the various fossil fuel based power plants in that city. The City of Oxnard has a General Plan provision for GHG, to reduce GHG emissions from public utility and privately owned power plants.

SCS 3.10 Alternatives to Power Plant Generation Evaluate the feasibility of incorporating alternative sources of power generation such as wind and tidal power into the regional existing power supply grid to reduce reliance on GHG emission producing public utility and privately-owned power plants.

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http://developmentservices.cityofoxnard.org/Uploads/Planning/2030_GP_Page_Jul11/2030_GP_02_Sustainable%20Community_%20FINAL.pdf
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The DEIR is incomplete as it does not discuss or provide alternatives that support the GHG emissions reduction in the Oxnard General Plan, the location of the fossil fuel generated electricity. The CEQA Regulations require that such a local or Regional plan be discussed in the DEIR.

Specific CEQA Regulations <u>http://ceres.ca.gov/ceqa/guidelines/</u>

(d) The EIR shall discuss any inconsistencies between the proposed project and applicable

general plans, specific plans and regional plans. Such regional plans include, but are not limited

to, the applicable air quality attainment or maintenance plan or State Implementation Plan, areawide $\begin{bmatrix} A16 \\ -11 \end{bmatrix}$

waste treatment and water quality control plans, regional transportation plans, regional

housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas

emissions, habitat conservation plans, natural community conservation plans and regional land

use plans for the protection of the coastal zone, Lake Tahoe Basin, San Francisco Bay, and Santa

Monica Mountains.

A16

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A16 -13

CEQA Green House Gas Requirements "GHG"

The Proposed Project would meet the meet the criteria of VII b) in that it conflicts with the Oxnard General Plan Objective to reduce GHG emissions from public utility and private power plants within the City of Oxnard. As stated earlier the Proposed Project relies on the Moorpark Substation for its power supply, which in turn relies on the power plants in the city of Oxnard. The significant criteria is as follows:

VII. GREENHOUSE GAS EMISSIONS --

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the

emissions of greenhouse gases?

Mitigation Measures that are Required

In addition, the CEQA Regulations requires specific mitigation measures be considered to support the reduction of GHG Emissions. Please note that CEQA requires the lead agency to consider feasible means to reduce GHG emissions for any Proposed Project. The DEIR does not consider or propose any mitigation measures for the increase in GHG due to the expansion of GHG emissions caused by the Proposed Project and any Alternative that utilizes power from the Moorpark Substation.

(c) Mitigation Measures Related to Greenhouse Gas Emissions.

Consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

(1) Measures in an existing plan or mitigation program for the reduction of emissions that are

CEQA Green House Gas Requirements "GHG"

required as part of the lead agency's decision;

(2) Reductions in emissions resulting from a project through implementation of project

features, project design, or other measures, such as those described in Appendix F;

(3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's

emissions;

(4) Measures that sequester greenhouse gases;

(5) In the case of the adoption of a plan, such as a general plan, long range development plan, or

plans for the reduction of greenhouse gas emissions, mitigation may include the identification of

specific measures that may be implemented on a project-by-project basis. Mitigation may also

include the incorporation of specific measure or policies found in an adopted ordinance or regulation

that reduces the cumulative effect of emissions.

There are numerous mitigation methods available, including the Alternative of a large scale Distributed Generation Alternative using Commercial and Residential Solar, specialized Energy Efficiency Alternative such as an HVAC replacement program, or focused Demand Management enrollment program. These Alternatives were not fully evaluated in the DEIR and are now required under CEQA. All of these Alternatives could be funded and owned by SCE as an infrastructure improvement, with no impact on SCE financial gain. In other words the funds expended would be considered investments by SCE versus competing with SCE, unless of course SCE ignores the Alternative and t is replaced by private funding.

A16 -14

A16 -13

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CEQA Green House Gas Requirements "GHG"

Conservation of Energy

The CEQA Regulations also requires that the Proposed Project consider the conservation of energy in the Proposed Project and the Alternatives. In the current DEIR there is no discussion or Alternative designed to incorporate conserving energy as defined in the CEQA Regulation shown below:

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) decreasing overall per capita energy consumption,

(2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and

(3) increasing reliance on renewable energy sources.

In order to assure that energy implications are considered in project decisions, the

California Environmental Quality Act requires that EIRs include a discussion of the

potential energy impacts of proposed projects, with particular emphasis on avoiding or

reducing inefficient, wasteful and unnecessary consumption of energy (see Public

Resources Code section 21100(b)(3)). Energy conservation implies that a project's cost

effectiveness be reviewed not only in dollars, but also in terms of energy requirements.

For many projects, lifetime costs effectiveness may be determined more by energy

efficiency than by initial dollar costs. A lead agency may consider the extent to which an

energy source serving the project has already undergone environmental review that

adequately analyzed and mitigated the effects of energy production.

Therefore it is a requirement that the DEIR incorporate the lifetime GHG impacts due to the method of energy production for the Proposed Project and the Alternatives. This should include a re-evaluation of some Alternatives that were not fully considered such a Commercial Rooftop Solar, Residential Solar and other methods of Distributed energy projection. In addition, the actual results from Distributed Generation, Energy Efficiency and Demand Management that have been implemented since the issuance of the PEA should be considered an Implemented Alternative and incorporated in the DEIR.

PRESIDENTIAL SUBSTATION PROJECT



Southern California Edison



3.2.16 Letter A16 – Responses to Comments from STTOP

- A16-1 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1. The commenter makes reference to "known" steps taken in the ENA and requests that these be considered as an "implemented alternative." The commenter infers that these steps are likely due to off loading of load and other energy efficiency actions. The CPUC considered the load rolling components included in the demand projections and operations, as discussed in Master Response 1, *Alternatives* in Section 3.1.1. Other such actions are likely part of the baseline for the Proposed Project and as such, would already be considered implemented for analysis purposes by the Draft EIR.
- A16-2 The comment expresses support for System Alternative B and prefers Alternative Subtransmission Alignment 4 over Alternative Subtransmission Alignment 3. Comment noted. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1.
- A16-3 The commenter provides a list of alternatives that the commenter request be further analyzed or considered in a revised Draft EIR. See Responses A5-1 and A5-6, Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 2 in Section 3.1.2.
- A16-4 The commenter provides a list of items the commenter feels were not addressed and requests that the Draft EIR be expanded to cover them. The following addresses each of the items:
 - 1. GHGs relevant to the CEQA review for the Proposed Project are addressed in Draft EIR Section 4.7, *Greenhouse Gas Emissions*. Regarding the Oxnard goal to reduce GHG from the local power plants that serve the electrical needs area, see Responses A16-10 through A16-13.
 - 2. Validity of easements, franchise, and encroachment agreements. It is unclear if the commenter is concerned that these agreements are invalid or if some description provided in the Draft EIR is invalid. The Draft EIR provides numerous references to easements and Section 2.6, *Rights-of-Way Requirements*, provides additional information. Also see Responses A15-36, I5-5, I18-3, I22-4, and I22-10.
 - 3. EMF approach. As discussed in Section 2.10, *Electric and Magnetic Fields*, of the Draft EIR, the CPUC decision D.06-01-042 on EMF analysis is fully explained. See also Master Response 2, *Non-CEQA Issues*.
 - 4. Impact on farmland. See Draft EIR Sections 4.2, *Agriculture and Forestry Resources*, and 4.9, *Hydrology and Water Quality*.
 - 5. Analysis of environmental impacts based on exact location of poles and vaults. As noted on page 2-18 of the Draft EIR:

3.2 Agencies and Organizations Responses

"Note that identified pole locations, as well as the heights and ranges identified in Table 2-4, on Figures 2-9a through 2-9f and throughout the text, are estimates based on preliminary engineering and provided for general context only. Specific pole locations and heights will be determined during final engineering, but are not anticipated to deviate in a substantial way from the locations, heights and ranges set forth in Table 2-4, the text and Figures 2-9a through 2-9f."

As noted in the Draft EIR, the locations of the poles and vaults are preliminary and their exact location would be determined during final engineering following project approval. This is not an unusual occurrence for the CEQA review process. The analysis of each resource section considers such factors in their analysis and typically evaluates for this type of project, the area around the preliminary location or the corridor of the ROW or easement. Furthermore, following project approval, the CPUC monitors construction for compliance with the approved project and implementation of approved mitigation measures (see Chapter 8, *MMRCP* of the Draft EIR). Consequently it is not necessary to know the exact location of the poles or vaults of the Proposed Project as long as when implemented they do not deviate in any substantial way from what is described and considered in the EIR.

- 6. Impacts on septic systems. These impacts are considered and addressed in the Draft EIR in Section 4.6, *Geology, Soils, Seismicity, and Mineral Resources*, and Section 4.8, *Hydrology and Water Quality*, and Section 4.16, *Utilities and Service Systems*.
- 7. Impact to traffic safety on Sunset Valley and Read Road. See Response I5-12 and I37-3.
- 8. Cumulative impact of noise was not measured on Read Road and Maya Padera Road. The authors are unclear as to what the commenter referrers to by cumulative impact noise measurements. Ambient noise measurements were taken in five locations within the study area as shown on Figure 4.11-1 and results are presented on Table 4.11-1 of the Draft EIR. A full 24-hour day of ambient noise monitoring (long term) was recorded along the eastern end of Read Road very near Maya Padera Road (see Figure 4.11-1 and Table 4.11-2 of the Draft EIR for results). These measurements were used to describe the existing environmental noise setting for the Proposed Project and the long term data are viewed as very representative of the area of concern by the commenter.
- 9. Draft EIR scope was narrowed to exclude economic impact. The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on economic issues.
- 10. Draft EIR did not consider environmental impact on new easements. See response to Item 2 above in this Response.
- 11. Project objectives not updated. See Response A15-4.

- 12. Property owners oppose easements. See response to Item 2 above in this Response. Subtransmission lines would be largely located within existing road ROW. Only overhang easements would be required. See Response A15-36.6
- 13. Economic impact of taking of land. The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on economic issues.
- 14. Projects that are known that have contributed to meet the demand of electricity within the ENA. It is unclear as to what the commenter is referring or requesting here. The Draft EIR considers other CEQA projects within the study area in Section 3.6, *Cumulative Projects*. The commenter is referred to that section for more information. In addition, this comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- 15. Impact on local land uses from SOAR. SOAR is addressed in Draft EIR Section 4.10, *Land Use*, and further information is provided in Responses A5-5 and A15-33 above.
- A16-5 The comment expresses support for System Alternative B. See Responses A5-1 and A5-6, and Master Response 1, *Alternatives* in Section 3.1.1.
- A16-6 See Master Response 1, *Alternatives* in Section 3.1.1.
- A16-7 See Master Response 1, *Alternatives* in Section 3.1.1.
- A16-8 See Master Response 1, *Alternatives* in Section 3.1.1.
- A16-9 See Master Response 1, *Alternatives* in Section 3.1.1.
- A16-10 The commenter suggests that the Project would increase reliance on fossil fuelbased electricity that is generated in the City of Oxnard. The CPUC disagrees. Although it is possible that some fossil fuel-based electricity generated in Oxnard that is put on the regional electrical grid could flow through the electrical infrastructure associated with the Proposed Project, it is not generally possible to determine the exact generation source, much less whether it is fossil fuel- or renewable-based. As such, there is no basis to suggest that the Proposed Project could increase reliance on fossil fuel-based electricity generated in Oxnard. Also, see Response A16-11.

The Proposed Project would not be located within the City of Oxnard, and the ENA is located more than 15 miles east of the City of Oxnard. As such, the City of Oxnard does not have jurisdiction over the project.

A16-11 The commenter states that the Draft EIR is incomplete because it does not discuss or provide alternatives that support City of Oxnard General Plan

Policy SC 3.10, *Alternatives to Power Plant Generation*. However, it is not clear how the City of Oxnard's policy to evaluate the feasibility of incorporating alternative energy sources into the regional power supply grid is relevant to the Proposed Project as the ENA is located more than 15 miles east of the City of Oxnard. In any case, while electricity generated in Oxnard that is put on the regional electrical grid could flow through the electrical infrastructure that would be associated with the Proposed Project, it is not generally possible to determine the exact generation source of the electricity, much less whether it is fossil fuelor renewable-based.

- A16-12 See Response A16-11. The commenter is referred to Draft EIR Section 4.7, *Greenhouse Gas Emissions*. Additionally, pursuant to General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the Proposed Project.
- A16-13 The commenter is incorrect to suggest that mitigation measures to reduce Proposed Project-related GHG emissions are required by CEQA. In fact, mitigation measures are only required for impacts that are found to be significant. As disclosed in Draft EIR Section 4.7, *Greenhouse Gas Emissions*, the Proposed Project would result in less than significant impacts related to GHG emissions; therefore, mitigation measures are not required.
- A16-14 This comment is a summary comment of the commenter's earlier remarks. The commenter states that many of the commenter's proposed alternatives are now required (although the commenter does not explain how they are required) or could be funded by SCE at no cost. The Draft EIR screened and analyzed a reasonable range of alternatives; see Responses A5-1 and A5-6 as well as Master Response 1, *Alternatives* in Section 3.1.1.
- A16-15 The commenter correctly states that CEQA requires analysis of Conservation of Energy (EC) for the Proposed Project and alternatives. While it is true that a specific discussion of energy conservation for the Proposed Project was not directly presented in the Draft EIR, the commenter overlooks the two alternatives presented in Sections 3.5.8 and 3.5.9 of the Draft EIR that address energy conservation alternatives (see Section 3.5 of the Draft EIR and text changes presented in Chapter 4 of this Final EIR).

From an energy conservation standpoint, the nature of the Proposed Project (installation of a new substation, subtransmission, and distribution system) does not lend itself to evaluation of the typical criteria found in Appendix F of the CEQA Guidelines which provides guidance for assessing energy conservationrelated impacts of development projects. The goal of this guidance is to conserve energy by:

1. decreasing overall per capita energy consumption;

- 2. decreasing reliance on natural gas and oil; and
- 3. increasing reliance on renewable energy sources.

As is discussed in response A15-37, the Proposed Project is not growth inducing and is intended to be demand following; consequently it would not increase per capita energy consumption and thus nominally meets the first goal of energy conservation. The Proposed Project is about distribution of electrical energy generated from any potential generation source, such as hydro-electric, fossil, nuclear, and/or alternative sources. In regard to the source of the energy, the Proposed Project would be said to be either meeting Goals 2 and 3, or at least not working against them. The net result is that the Proposed Project would be built using current building codes and would be required to implement energy conservation standards for construction. As it is a net supplier of electrical energy, no impacts to energy conservation are expected.

Regarding the commenter's concerns about GHG emissions, please see Draft EIR Section 4.7, *Greenhouse Gas Emissions*. Regarding implemented alternatives, see Response A16-1.

Comment Letter A17



United States Department of the Interior

FISH AND WILDLIFE SERVICE Ventura Fish and Wildlife Office 2493 Portola Road, Suite B Ventura, California 93003



IN REPLY REFER TO: 08EVEN00-2012-CPA-0028

November 28, 2011

Juralynne Mosley, Environmental Project Manager Presidential Substation Project c/o Environmental Science Associates 1425 N. McDowell Boulevard, Suite 105 Petaluma, California 94954

Subject: Notice of Availability of a Draft Environmental Impact Report for the Presidential Substation Project, Ventura County, California (A.08-12-023)

Dear Ms. Mosley:

We are responding to your request for comments on the Draft Environmental Impact Report (DEIR) for the Presidential Substation Project. The Notice of Availability was dated September 16, 2011, and received in our office September 19, 2011. The proposed project is located in portions of unincorporated Ventura County, and the city of Thousand Oaks, California.

We understand that you are seeking a permit through the California Public Utilities Commission (PUC) to construct the proposed project, which consists of the following elements:

- A new 66/16 kilovolt (kV) distribution substation (Presidential Substation) on an approximate 4-acre site;
- Replacement of existing 16 kV distribution and subtransmission poles with new subtransmission poles and installation of 66 kV subtransmission conductor to supply the proposed Presidential Substation;
- Installation of underground 66kV subtransmission facilities for the portion of the route crossing Highway 23;
- Construction or relocation of related 16 kV distribution components, including 4 new 16kV distribution getaways at the proposed Presidential Substation, and relocation, transfer, or upgrade of existing 16 kV distribution facilities either to new subtransmission poles or to new underground 16 kV distribution facilities. Upgrades to new 16 kV distribution would involve installation of new conductors instead of re-hanging or burying the existing 16 kV conductor; and
- Construction of facilities to connect the proposed Presidential Substation to Southern California Edison's (SCE) existing telecommunications system.

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The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibit the taking of any federally listed fish and wildlife species without special exemption. Section 3(19) of the Act defines "take" to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Service regulations (50 CFR 17.3) define "harm" to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species.

Exemptions to the prohibitions against take in the Act may be obtained through coordination with the Service in two ways. If a project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If the proposed project does not involve a Federal agency, but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. To qualify for the permit, you would need to submit an application to the Service together with a habitat conservation plan (HCP) that describes, among other things, how the impacts of the proposed taking of federally listed species would be minimized and mitigated and how the plan would be funded. A complete description of the requirements for a HCP can be found at 50 CFR 17.32.

As it is not our primary responsibility to comment on documents prepared pursuant to the California Environmental Quality Act (CEQA), our comments on the DEIR do not constitute a full review of project impacts. We are providing our comments based upon a review of sections addressing biological resources, project activities that have potential to affect federally listed species and migratory birds, and our concerns for listed species within our jurisdiction related to our mandates under the Act.

The DEIR states that the project area supports coastal sage scrub, coastal sage scrub/coast prickly pear succulent scrub, coastal sage, chaparral scrub, chamise chaparral, non-native grassland, freshwater marsh, willow riparian scrub, mule fat scrub, oak woodland, California walnut woodland, agriculture, ornamental/developed, ruderal, and disturbed areas throughout the overall project area. At the proposed Presidential Substation site, the principal natural communities are coastal sage scrub, chamise chaparral and non-native grassland. Areas west of the Presidential Substation site are predominantly natural, and support the same vegetation communities including coastal sage scrub/coast prickly pear succulent scrub.

The DEIR found that the following federally listed species have the potential to occur within the proposed project area: the federally endangered Riverside fairy shrimp (*Streptocephalus woottoni*), least Bell's vireo (*Vireo bellii pusillus*), Braunton's milkvetch (*Astragalus brauntonii*), California Orcutt grass (*Orcuttia californica*), and Lyon's pentachaeta (*Pentachaeta lyonii*), and the federally threatened coastal California gnatcatcher (*Polioptila californica*)

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Juralynne Mosley

californica), Agoura Hills dudleya (Dudleya cymosa ssp. agourensis), and Conejo dudleya (Dudleya parva).

We are concerned with the DEIR's characterization of the potential project impacts to Lyon's pentachaeta and the coastal California gnatcatcher. According to Attachment 8 of Data Response number 4 on the PUC's website for the proposed project (page 2), suitable habitat is present for Lyon's pentachaeta on the Presidential Substation project site and protocol-level surveys have not been conducted. The survey report recommends conducting focused surveys for the species on the Presidential Substation site before construction. Table 4.4-1 of the DEIR states that Lyon's pentachaeta is absent from the Presidential Substation site, and was not detected during surveys. It is unclear whether surveys according to our protocol have been completed at the proposed Presidential Substation site for Lyon's pentachaeta. Due to the suitable habitat present onsite, we recommend conducting surveys according to our protocol for Lyon's pentachaeta at the Presidential Substation site if they have not already been completed. If surveys are conducted, the DEIR should be revised with any new survey information.

We also have concerns regarding the potential impacts of the proposed project on the coastal California gnatcatcher. The DEIR and supporting documents state that a juvenile coastal California gnatcatcher was observed approximately 1,000 feet from the Presidential Substation site. The DEIR also characterizes the habitat on the Presidential Substation site and surrounding properties as potentially suitable for the coastal California gnatcatcher, including vegetation consisting of coastal sage scrub and prickly pear succulent scrub. The coastal California gnatcatcher is a year-round resident species, and direct or indirect project impacts to suitable habitat may adversely impact the species at any time of year. Although the juvenile coastal California gnatcatcher that was observed may have been a transient that may not use the Presidential Substation site in the future, it is also possible that the individual has taken up residence at the Presidential Substation site or in the immediate vicinity. Coastal California gnatcatchers may currently use the project site to forage and could potentially use the proposed project site to breed in the near future. Our data indicates that the coastal California gnatcatcher is currently expanding throughout its historical range and has recently been observed in locations previously considered unoccupied including nearby locations in Newberry Park and Camarillo, California. Because we believe the species is currently expanding throughout its range, surveys conducted according to our protocol for the coastal California gnatcatcher are only valid for one year.

We recommend conducting surveys according to our protocol for the coastal California gnatcatcher at the Presidential Substation site within one year of any removal of suitable habitat (i.e., coastal sage and cactus scrub). If a coastal California gnatcatcher is observed within 500 feet of the proposed project site, we recommend contacting our office immediately to determine if additional avoidance measures could effectively reduce the risk of taking a coastal California gnatcatcher. If the proposed project cannot be completed without resulting in the take of the coastal California gnatcatcher, an exemption to the prohibitions against take would be required as stated in the above paragraphs.

A17-1

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Juralynne Mosley

We appreciate the opportunity to provide comments on the Draft Environmental Impact Report for the Presidential Substation Project. If you have any questions regarding our comments, please contact Colleen Mehlberg of my staff at (805) 644-1766, extension 221.

Sincerely,

Diane le UDe

Diane K. Noda Field Supervisor

cc:

Dan Blankenship, California Department of Fish and Game

3.2.17 Letter A17 – Responses to Comments from U.S. Fish and Wildlife Service

- A17-1 Protocol-level surveys for Lyon's pentachaeta documented its absence from the proposed Presidential Substation site, proposed subtransmission alignment and Alternative Substation Site B, as identified in the Draft EIR (page 4.4-17 to 4.4-18). Low quality habitat (i.e., areas that provide poor habitat for Lyon's pentachaeta) was additionally identified on portions of Alternative Subtransmission Alignment 1 located north of the proposed Presidential Substation site, and also in roadside habitat along Alternative Subtransmission Alignment 2. Consistent with the requirements of Mitigation Measure 4.4-6a, focused surveys will be performed consistent with accepted survey protocols if one of the alternative alignments is selected.
- A17-2 See Response A4-3.

3.3 Individual Responses

This section includes the letters received from individuals, with individual comments delineated as indicated above, followed by responses to each comment.

To: Juralynne Mosley, Environmental Project Manager

From: Betty Evans 1382 Calle Fidelidad Thousand Oaks, Ca 91360

Subject: Presidential Substation Project (A.08-12-023)

Date: September 21, 2011

I would like to voice an objection to the Proposed Project and Draft EIR f\or Presidential Substation Project. I live in the Sunset Hills Development across from the Sunset Hills Golf Course and I cannot imagine that you would consider constructing overhead utility lines along Olsen Road. My house along with many others backs on Olsen Road and we would all be impacted by this proposed installation of poles and utility lines. Aside from the fact that I am in Real Estate and it would negatively impact the values in this area, it would be unsightly and carry health risks for the many families that raise their children in this family oriented community.

I feel strongly that an alternate solution needs to be found for this project, there are certainly other routes that would meet your long term electrical demands without such detrimental effects to our community of homes. The idea of above ground lines along Olsen Road is a bad solution to for this project.

Please feel free to contact me anytime regarding this objection. Thank You,

Betty Evans (805)529-0571 (805)338-0526 cell



3.3.1 Letter I1 – Responses to Comments from Betty Evans

- I1-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. The commenter's opposition to the Proposed Project is noted.
- I1-2 The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials* for an analysis on safety and Draft EIR Section 4.1, *Aesthetics* for an analysis on visual impacts. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- I1-3 See Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on alternatives.

October 13, 2011

Matt Anaya 1474 Calle Fidelidad Thousand Oaks, CA 91360

Ms. Juralynne Mosley Presidential Substation Project C/O ESA 1425 N. McDowell Blvd., Suite 200 Petaluma, CA 94954

Dear Ms. Juralynne Mosley,

My family and all of our neighbors are absolutely opposed to having overhead power lines on Olsen Road.

My family and I have lived in Sunset Hills, Thousand Oaks since May of 1997. I have a wife and two daughters. We love living here. The neighborhood is peaceful. The neighbors are very friendly. Our neighborhood has original homeowners. The neighborhood was developed in the 1960's. What makes our neighborhood and home more special is the natural setting with great views of the mountains, trees and golf course.



One thing we noticed when we moved here was the absence of electrical poles and overhead power lines. We used to live in the San Fernando Valley. Electrical poles and overhead power lines were everywhere and were definitely an eyesore.

12-1

Page 1 of 2

12-2

12-3

12-4

The biggest reason for buying our home here was that it had a great view. We find it offensive and unacceptable that someone would install electrical poles and overhead power lines on our property, especially without our consent. It will obstruct our view degrading its natural setting, reduce our property value, cause a buzzing sound and emit EMF.

If underground power lines were possible in the 1960's, I find it hard to believe that electrical poles and overhead power lines are the best Edison can do 40+ years later. Edison should be looking into alterative energy sources like solar or wind energy and maybe the Bloom Boxes from Bloom Energy. These Bloom Boxes are proving to Bloom Energy customers to be a viable energy source for their businesses.

Sincerely,

Matt Anaya

3.3.2 Letter I2 – Responses to Comments from Matt Anaya

- I2-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- I2-2 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- I2-3 The commenter expresses general concerns pertaining to aesthetic impacts, property values, noise, and electric magnetic frequency. These issues were considered and discussed in the Draft EIR Sections 4.1, *Aesthetics*, 4.11, *Noise*, and 4.13, *Hazards and Hazardous Materials*, and Appendix B.1, *Electric and Magnetic Fields Summary*. The commenter is referred to Master Response 2, *Non-CEQA Issues*, in Section 3.1.2, for discussions about why EMFs and property values are not addressed in the EIR in terms of environmental impacts. The commenter's concern about power lines being constructed on private property is noted. The Proposed Project activity would take place within existing road ROW. Only minor additional overhang easements would be required and no physical improvements would be located within these easements. Additional land rights other than potential overhang easements could be required for access roads and the subtransmission line east of Hwy 23.
- I2-4 The commenter is referred to Master Response 1, *Alternatives* and Master Response 3, *Undergrounding*, in Section 3.1.

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Dennis Broersma Commenter Address: 1540 Calle Fidelidad, Thousand Oaks, 91360 Comment: Any EIR that does not consider all the organisms to be People should receive impacted by the project incomplete no 14 consideration than other creature plants h storfloer or any FACT human hould ake impact on EMES/Sleeping Mposure + Aro1 human 13-1 15 aesthetics properta Value For rea negative impact 10 Or corridor 5 nould

3.3.3 Letter I3 – Responses to Comments from Dennis Broersma

I3-1 The commenter is referred to Master Response 2, Non-CEQA Issues, in Section 3.1.2, for discussions about why EMFs and property values are not addressed in the EIR in terms of environmental impacts. The commenter is referred to Draft EIR Section 4.1, Aesthetics, for an analysis of the impacts that the Proposed Project would have relative to aesthetics.

Comment Letter I4

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Deborah Cassar Commenter Address: 3678 Sunset Valley Rd, Moorpark Comment: We have a concern longterm ardina rec hearth concerns We live, Play . an 0 14-1 directly where be Dropos loca Lo vel a

3.3.4 Letter I4 – Responses to Comments from Deborah Cassar

I4-1The commenter expresses concerns regarding long-term health and is referred to
Draft EIR Section 4.13, *Hazards and Hazardous Materials* and Master Response 2,
Non-CEQA Issues in Section 3.1.2 for a discussion on EMFs.

PUBLIC COMMENT CARD

Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011

Commenter: Name: Jennifer Crandall, DDS Address: 4956 Read Road Thousand Oaks, CA (mailing postoffice address is Moorpark, 93021)

Comment: I live on a 5 acre beautiful equestrian estate on Read Road which the SCE is recklessly proposing large steel poles and sub-transmission lines without proving a need for the project nor proposing alternatives with less impact to the rural scenic beauty, the wildlife, and the home values.

THERE IS NO PROVEN NEED FOR THIS PROJECT. THEREFORE, NO LINES AND NO SUBSTATION IS THE CORRECT SUPERIOR ENVIRONMENT ALTERNATIVE OPTION. The SCE was reckless with its hypothetical projection of increase electric needs for the area that they projected out from 2008 to 2012. It is now 2011, and the ACTUAL demand needed was substantially less than the 3-4 years than they predicted 15-2 and thus wrongly and recklessly proposed this substation and higher voltage lines and steel poles. They gave a big campaign at the onset of this proposal advertising that 'the SCE is a company we can trust'. This actual usage for the past 3 years is not disclosed in the EIR and the SCE is trying to keep the truth from us. Once these large steel towers go up, they will never be coming down, and they will be destructive dinosaurs to our beautiful Tierra Rejeda Valley. The SCE has already began charging us for this 15-3 project even though it hasn't been built, and they has placed the same initial charges two years in a row which is fraudulent.

THIS PROPOSED PROJECT HAS MADE IT AN EXTREME HARDSHIP TO SELL MY PROPERTY. My ranch was for sale the year the signs for the project went up and place a foot away from my for sale sign (see attached photo). I could not get any specifics from the SCE to disclose to potential buyers and this whole pending power line proposal 15-4 destroys my possibilities to sell my home. Would you buy a ranch estate with this project pending along its front yard and entrance??? Thus, IT HAS CREATED A LARGE DISCOUNT IN THE PRICE ON TOP OF THE PRICE REDUCED FROM THE ECONOMIC DOWNTURN. THE STEEL TOWERS AND LINES WILL BE LESS THAN 100 FEET TO MY BEDROOM WINDOW AND MY FRONT DOOR.

THE SCE DOES NOT HAVE LEGAL EASEMENT FOR SUBS-TRANSMISSION LINES 15-5 AT THE FRONT OF MY PROPERTY LINE. The SCE has a narrow easement for distribution lines and poles. The horizontal members of steel towers would cross over my property line and the easement would be violated along with my LEACH FIELDS FOR MY SEPTIC WOULD BE INVADED AT THE FRONT OF MY PROPERTY. There is no other place to put the leach fields for the two septic systems since my ranch is on a slope and terraced. The front 1/4 of the 5 acres is the lowest point. THERE IS ALSO AN ABANDONED WELL THAT IS ON THE FRONT CORNER OF THE PROPERTY LINE THAT WOULD BE INVADED. These two issues not only pose a severe environmental impact, but they create disastrous conditions in relation to my property

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PUBLIC COMMENT CARD

value. THE DEIR DOES NOT IDENTIFY THE VAULT AREAS THAT ARE NEEDED IN ADDITION TO THE EDGE OF THE ROAD EASEMENT. The SCE is again being reckless by the fact they haven't done their homework.

Attached is a photo of the tree-lined fence line of my property and Read Road. READ ROAD IS A DESIGNATED SCENIC ROUTE IN THE COUNTY OF VENTURA, these proposed steel structures destroy the beauty of this designated route and belong besides freeways or industrial areas.

ALL THESE TREES WILL BE DESTROYED IN THE PROCESS OF THE PROJECT. Whether its the trenching and tunneling for laying the lines underground, or the 30 feet deep holes that are dug, either digging WILL DESTROY THE ROOT SYSTEMS and therefore the trees. THESE TREES HOUSE MANY SPECIES OF BIRDS AND ANIMALS including red-tail hawks and big horned owls. The project therefore creates a severe environmental impact 100 feet from my front door and destroys the beauty of my front yard and entrance to my ranch. The DEIR does not evaluate this destruction properly by outlining which trees will be destroyed nor the envelop on digging needed.

Another large environmental impact this SCE transmission line project will create is A LARGE SAFETY HAZARD for the equestrians here. I am 53 years old and train young horses 25 yards from the current distribution lines and Read Road. Horses are extremely sensitive to noise and vibration. I can not ride during the times the trees are getting trimmed as the horses are too frightened. THIS PROJECT WILL MAKE IT EXTREMELY DANGEROUS TO TRAIN MY HORSES, AND FOR MY BOARDERS AND TRAINER. IT WILL AFFECT MY BREEDING PROGRAM TOO. BETWEEN LOSS OF BROADERS AND BREEDING, IT WILL HAVE A DISASTROUS FINANCIAL IMPACT ON THE BUSINESS REVENUES AS WELL A LARGE SAFETY ISSUE.

READ ROAD IS A NARROW ONE LANE-SCENIC ROAD WITH NO OUTLET, JUST ONCE SOURCE OF INGRESS AND EGRESS. This project creates an increased risk of fire hazard and safety concerns.

READ ROAD IS A DESIGNATED BICYCLE ROUTE with not even a bike lane nor two lanes for cars. AND, the shoulder of Read Road is actually the easement that SCE holds for distribution poles and wires. There is no shoulder for parking on Read Road! INSTALLING STEEL TOWERS AND THE PROCESS OF THE PROJECT WILL MAKE IT DANGEROUS FOR THE BICYCLISTS AS WELL AS RUIN THEIR ENJOYMENT OF THEIR ROUTE. AGAIN, THESE TOWERS BELONG ALONG HIGHWAYS OR AN INDUSTRIAL AREA, NOT ALONG A DESIGNATED SCENIC RURAL COUNTRY LANE WITH ESTATE HOMES, NOT ALONG A BICYCLE ROUTE, NOR THE DESIGNATED EQUESTRIAN BRIDLE PATHS THAT GO ALONG THIS ROUTE. THIS WHOLE PROJECT IS A HUGE VIOLATION OF ALL THAT WE NEED TO PROTECT.

THE EIR IS INSUFFICIENTLY DONE SINCE: 1) IT NEEDS TO ADDRESS ALTERNATIVE ENERGY RESOURCES THAT ELIMINATES ANY FUTURE NEED FOR SUCH A PROJECT AS THIS. 2)THE EIR NEEDS TO ADDRESS NO PROJECT AS AN ALTERNATIVE. THE EIR NEEDS TO ADDRESS PUTTING ALL LINES

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PUBLIC COMMENT CARD

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UNDERGROUND IF A NEED CAN BE PROVEN. 3)THE DEIR HAS IGNORED THE SOLAR ENERGY CHANGES THAT HAVE OCCURRED SINCE 2008. 4)IT HAS NOT MAPPED OUT THE TREE REMOVAL AND LOSS THAT WILL OCCUR WITH THE PROJECT 5)THE DEIR DOES NOT CONSIDER SIMPLE UPGRADES TO NEIGHBORING SUBSTATIONS TO HELP MEET ANY INCREASE DEMANDS.

We need a more careful and fully supervised approached to this project since all the alternatives have not been evaluated. Please do not allow SCE to continue with its expensive and reckless path to destroying our health, safety, home values, and beauty to our land that we so dearly need to preserve. Please consider ALL alternatives including the alternative of putting this on hold for 5 years to see if the demands ever get close to the wrong prediction they had during the last 3 years. There is no more build-able sites in Thousand Oaks. We are conserving energy more and more, as we all become more conscious of the expense and protecting our environment. We are upgrading our refrigerators, air conditioning, heating, light bulbs, all ...more and more. If there is no more building, we are all cutting costs, and increasing energy efficiency, it is wrong to predict such a surge upward in demand that warrants such a large project.

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3.3.5 Letter I5 – Responses to Comments from Jennifer Crandall

- I5-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. The commenter's opposition to the Proposed Project is noted. The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on Project need and Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on Proposed Project alternatives.
- I5-2 The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on Project need.
- I5-3 The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on economic issues.
- I5-4 The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- 15-5 The commenter expresses the opinion that SCE's easement on Read Road is for distribution lines and poles, and not subtransmission lines. Draft EIR Section 2.6, *Rights-of-Way Requirements*, discusses existing and new easements required for construction of the Proposed Project. As stated in the top paragraph of Draft EIR page 2-29:

"The proposed subtransmission alignments would be located within existing road ROW [right-of-way], currently being used for 16 kV distribution. However, some areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross-arms and wires, and may require additional rights depending on final engineering. The relocation of overhead 16 kV distribution circuits to newly installed underground facilities would require acquisition of new ROW east of Hwy 23. This existing overhead 16 kV distribution easement would be upgraded to accommodate the new subtransmission line."

The commenter is also referred to Draft EIR Figure 2-9d, which depicts the Proposed Project components near the commenter's property. Along the subject property, one existing pole in the middle of the property would be removed and replaced by two at edges of the property along Read Road. There would be no physical improvements on the subject property.

I5-6 The specific way(s) in which the Proposed Project would potentially impact a septic system or leach field, as well as, more broadly, how this may subsequently impact the quality of surface water or groundwater, is not made clear in the comment. There are no physical improvements proposed to the commenter's property and therefore no impacts to the existing septic system or wells would occur. As discussed in Response I5-5

above, additional overhang easements may be required. The overhang easements would accommodate pole cross-arms and wires, which would be located above the land only. Such an easement would not present a physical impediment to existing development.

- I5-7 The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- 15-8 The commenter expresses concerns about the location of the vault areas. There will be one vault underground outside of the northwest corner of the proposed Presidential Substation perimeter wall. Other vaults would be constructed within the duct bank, which would primarily be within the existing road ROW. See Draft EIR Figures 2-9a through f for details on the location of the duct bank.
- I5-9 The commenter correctly asserts that Read Road is a designated scenic route in Ventura County. The scenic qualities of Read Road are described in Draft EIR Section 4.1, *Aesthetics*, including on pages 4.1-11 through 4.1-18, page 4.1-21, and page 4.1-28. Figure 4.1-2 presents five photos of or from Read Road: Photos 2, 3, 4, 7, and 21. Draft EIR Figures 4.1-5 and 4.1-6 present existing views of Read Road and simulations of the viewshed after construction of the Proposed Project. For analysis of aesthetic impacts to Read Road, the commenter is referred to Draft EIR Impact 4.1-2, page 4.1-48. Implementation of Mitigation Measures 4.1-2a and 4.1-2b would reduce impacts to views from Read Road to less than significant.
- I5-10 As identified in Response A14-30, protective measures have been incorporated to ensure the protection of oak trees, City landmark trees, and mature ornamental species in the project area, including consultation with a certified arborist and coordination between the Applicant and County and local agencies. As identified in the Draft EIR, impacts to breeding birds will be avoided though the implementation of Mitigation Measure 4.4-3. Impacts on visual resources are addressed in Draft EIR Section 4.1, *Aesthetics*.
- I5-11 The commenter expresses concern about the safety of training and riding horses during project construction and a financial impact relative to training and riding horses along the subtransmission line when activities such as tree trimming along the line would occur. For information on noise impacts, see Draft EIR Section 4.11, *Noise* and for information on air quality impacts, including dust, see Draft EIR Section 4.3, *Air Quality*. Construction of the Proposed Project is anticipated to last 13 to 20 months total, with construction in any given location to span a much shorter time frame. Impacts associated with equestrian activities are addressed in Draft EIR Section 4.1, Aesthetics and Section 4.14 *Recreation*. However, impacts to horses are not addressed in Draft EIR Section 4.4, *Biological Resources*. CEQA addresses impacts to special-status and rare species and potential habitat loss and therefore concerns about dangers that the Proposed Project may present to horses is outside the scope of CEQA. Also see Section 3.1.2, Master Response 2, *Non-CEQA Issues*, for a discussion on economic issues.

- I5-12 The Draft EIR described Read Road and the potential impacts of project construction on access and traffic safety on that road. The width and dead-end character of the road is described on page 4.15-3, and its designation as a Class III shared-road bike route is noted on page 4.15-6. The following potential impacts are described on Draft EIR pages 4.15-11, 4.15-14, and 4.15-15: (a) temporary disruption of traffic flows and street operations if temporary lane and road closures were needed; (b) temporary access restrictions for residents of Read Road on the dead-end side of the construction work zone (access for emergency vehicles would be maintained at all times); and (c) temporary increased potential traffic safety hazards for vehicles, bicyclists, or pedestrians related to the addition of construction vehicles and equipment movement when access by non-construction personnel is permitted. The Traffic Management Plan (TMP), prepared per Draft EIR Mitigation Measure 4.15-1b and subject to approval of the appropriate state agency and/or local government(s), would reduce impacts to less-than-significant levels. As described on Draft EIR page 4.15-11, as part of the TMP, residents of Read Road on the dead-end side of the construction work zone would receive advance notice of the access restrictions and would be advised when to move motor vehicles out of the area to be closed. Residents of Read Road between Sunset Valley Road and the work zone would have full vehicle access at all time. As the active work zone progressed past residence driveways, more and more residents would be on the Sunset Valley Road side of the construction work zone, and would have full vehicle access.
- I5-13 See Response I5-12 regarding traffic safety and access concerns on Read Road.
- I5-14 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for information on the No Project Alternative, undergrounding, and alternative energy, and Master Response 3, *Undergrounding* in Section 3.1.3.
- I5-15 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for information on the No Project Alternative, undergrounding, alternative energy, and project alternatives that would upgrade existing substations (System Alternatives A and B). SCE provided an arborist report addressing tree removal caused by the Proposed Project. See Responses A14-30 and I5-10 for additional discussions on tree removal.
- I5-16 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1, and Draft EIR Section 4.13, *Hazards and Hazardous Materials* for a complete analysis of the Proposed Project's effects on human health and safety.
- I5-17 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for additional information on electricity demand and for additional information on alternatives.
- I5-18 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1for a discussion on electrical demand forecasting.

Comment Letter I6

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First, let me offer my appreciation to the work of the CPUC and its consultants on the DEIR and for making the trip to our lovely community. The residents are pleased with the NO Substation/No Lines alternative achieved through upgrading of existing substations and hope that the CPUC resists any push back on the Preferred Alternative. I am sure that SCE has many "non-standard" substation transformers and the PUC should requested that data as part of the research on that Alternative. As with any Draft work product there are a number of questions and concerns on the DEIR.

First, we are concerned about the introduction of several alternative substation sites within the Tierra Rejeda Valley, when sites that are already heavily disturbed were not considered. For example the site at the SW corner of Tierra Rejeda Rd and RT23 has been for sale and is thoroughly disturbed. It is one of the few places in Ventura County where a substation would be an overall improvement. This is just one example of Alternative site that should have been included.

Second, the No Project alternative was discussed in the first Pre-Hearing in June 2009. The then ALJ, Judge Grau, made it clear to all including the SCE's staff that the actual need for the project would be covered under the NO PROJECT alternative however this option is not adequately considered in the DEIR. This is a flaw in the DEIR as the Peak Demand in 2009 and 2010 averaged 50 MV below what SCE projected as peak demand for those years. For everyone's reference in the room the overstatement of peak demand by 50MV about the capacity of the proposed substation.

Third, the alternative to upgrade existing substations with standard equipment was also dismissed. It would bring the capacity up to 417 MV, which is about 25% higher that the average Peak Demand of the last two years, including the SCE heat storm factor. Who in this room believes that Simi 16-3 Valley and Thousand Oaks are going to grow by 25% in ten years. The combined growth over the next ten years per the General Plan of the two cities is less than 3%, compared to 38% needed to meet the demand provided by SCE. SCE should be required to explain the additional 35% increase in peak demand called for in their projections.

Fourth, there were non-substation alternatives dismissed including Demand Management and Distributed Solar. I would like to focus on the solar since both Simi Valley and Thousand Oaks are among the top cities in California when it comes to adopting solar. Even though SCE has over \$3 billion already approved for commercial rooftop solar programs and electrical needs area has many shopping malls, commercial buildings and strip shopping centers, no serious consideration of solar PV was included in the DEIR. The two cities of Thousand Oaks and Simi Valley also have over 30mw of interconnect available per SCE's own research. Under the proposed GRC 2012 SCE has a pending settlement with Votesolar requiring SCE to perform a Request for Proposal for distributed solar in lieu of a substation project. Given the agreement by SCE to perform a solar alternative and the interconnect available, we ask that the CPUC to insist on a solar RFP, as an alternative to the presidential substation project.

Fifth, the consumers cannot continue to pay ever-increasing costs for electricity in these hard times. Projects that have marginal justification, if any, are used to justify SCE rate increases. For example the Presidential Substation project was one of many used to justify the 2009 rate increase but the money was never spent on it even though our rates went up. However, the same Presidential Substation project is being used buy SCE to justify the additional rate increase for 2012. How can the CPUC force the consumers to pay for a same project twice in two separate rate increases?

Lastly. I would ask for a two week extension to comments on the DEIR. The timing of the DEIR meeting in close proximity to the Pre-Hearing date caused confusion with multiple notices including one with the wrong day. The end result is that the public is very confused as to the correct meeting to attend. We ask that the DEIR comment period be extended to November 15, 2011.

WAY A VEAN In addition to this statement comments on the DEIR will be made in writing to the CPUC and ES. Charles Cronin, sTTop

Strop SLE. 0R9

3.3.6 Letter I6 – Responses to Comments from Chuck Cronin

- I6-1 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on the range of alternatives considered in the Draft EIR.
- I6-2 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on the No Project Alternative, and on electrical demand. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need.
- I6-3 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion of alternatives that would upgrade existing substations (System Alternatives A and B) and for a discussion on electrical demand.
- I6-4 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion of the range of alternatives considered in the Draft EIR, including demandside management and solar options.
- I6-5 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. In regards to the commenter's concern regarding project cost and economic issues, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- I6-6 The commenter requested that the comment period be extended two weeks. The CPUC granted an extension of the review deadline, which ended on November 15, 2011. Therefore, the total duration of the Draft EIR public review period was 61 calendar days.

Comment Letter I7

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: ALISON MERKEL Commenter Address: 5 MEADDRARI Comment: California Public the inral YPEDP 1.1 51 G 17-1 na ON A stem M 6 OV GSP SU DA 20 ant up

3.3.7 Letter I7 – Responses to Comments from Alison Merkel

I7-1 The commenter expresses support for System Alternative B and an alternative route for the substation. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative B and other alternatives.

Comment Letter I8

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: haura Ullom Commenter Some Cucle Address: 390 They took the Comment: have aboles, what he Los Theo has æ the Ba 18-1 The 70 In day La

3.3.8 Letter I8 – Responses to Comments from Laura Wilson

I8-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This commenter's opposition to the Proposed Project is noted.

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Kin Halizak Commenter Address: 1933 N. BEACHWOOD OR., #205, LOS ANGGES CA 90068-4035 Comment: A Key Wild inkage in the lierra Kejada Vallen Weater 104 191 ion Projec irtxwww.dd nur 1 necles the coastal (105 'alltornia gnatcatcher ring and KAHISIA Onis pen ‡a cha e 1015 Deuthern litornia Edi Neck lessli CADSE POUTONMEN a ŜΛ. 625 destru and ignored t_{0} 19-2 INDEASE lement sinai 170 DUINO Techni forward Invere The California 101 SSim Make nvinnenta 77) 193 MACUTALI 1SUMMO MAAN INE ETS ne IN <u>IMPACIS</u> 10WINHFP TTERK 10 (a. nynun 1al/4 Alta trism , P The all CVA NDT NEEN IMES Mew Substations and ard カイトレ 11071 uH. oast lizal

3.3.9 Letter I9 – Responses to Comments from Kim Halizak

- I9-1 For potential Proposed Project impacts to wildlife linkages (i.e., corridors) see
 Response A6-3. Potential impacts to designated critical habitat for coastal California gnatcatcher, Riverside fairy shrimp, and Lyon's pentachaeta are discussed in the Draft EIR in Section 4.4, *Biological Resources*.
- I9-2 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative B and other alternatives, including renewable energy and energy efficiency options. See also the impact analysis contained in the Draft EIR in Section 4.4, *Biological Resources*.
- I9-3 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative B.
- 19-4 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand and Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on the need for the Proposed Project.

	Public Comment Card	10/ighi	(March)
	Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm		
Commenter Name: 100	ISE MEISTERIAL		
Address: 14	32 CALLE ARTIGAS; THOUSAND BAN	5 CA 91360	
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3.3.10 Letter I10 – Responses to Comments from Louise Meisterling

- I10-1 The commenter expresses support for increasing the capacity of existing substations. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative A and System Alternative B.
- I10-2 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand and Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need.
- 110-3 This comment expresses concerns regarding the aesthetic impacts of overhead lines. Visual impacts from the construction of Alternative Subtransmission Alignment 2, a portion of which would be located on Olsen Road in the City of Thousand Oaks, are analyzed in Draft EIR Section 4.1, *Aesthetics*. The commenter is also referred to Master Response 3, *Undergrounding* in Section 3.1.3.
- 110-4 The commenter expresses opposition to Alternative Subtransmission Alignment 2 and support for System Alternative B and undergrounding the subtransmission lines. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 and Master Response 3, *Undergrounding* in Section 3.1.3.

October 21, 2011

Juralynne Mosley **Environmental Science Associates** 1425 N. McDowell Bl. Ste. 200 Petaluma, CA 95954

Re: Edison Presidential Substation in Simi Valley

Ms. Mosley,

I am taking this opportunity to voice my opinion that because the proposed project will have considerable impact on aesthetics and the environment at the location on | 111-1 Madera, west of the Presidential Library; I would rather see "system alternative B" adopted.

Thank you for accepting public input on this most important decision for the City o Simi Valley, where we value our quality of living.

Respectfully yours,

Heidi Manualto

Heidi Dauwalter 2918 Rosette St. Simi Valley, CA 93065

Megan Steer

From:	Heidi Dauwalter [heididauwalter@yahoo.com]
Sent:	Friday, October 21, 2011 3:37 PM
To:	Presidential Substation Project
Subject:	Edison's Presidiential Substation Project
Follow Up Flag:	Follow up
Flag Status:	Flagged
Categories:	Yellow Category

Hello,

I want to voice my opinion that system alternative B would be my choice as opposed to spoiling scenic vistas and resources or create additional artificial lighting in the area of Madera, west of the Presidential Library.

Heidi Dauwalter 2918 Rosette St. Simi Valley, CA 93065

3.3.11 Letter I11 – Responses to Comments from Heidi Daulwalter

- I11-1 The commenter expresses support for System Alternative B, for aesthetic reasons. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1.
- I11-2 The commenter expresses support for System Alternative B, for aesthetic reasons. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1.

From:	Dennis Broersma [dbroersma@yahoo.com]
Sent:	Tuesday, October 25, 2011 7:54 PM
To:	Presidential Substation Project
Subject:	Presidential Substation Project
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Green Category

Juralynne Mosley Environmental Science Associates

Dear Ms. Mosley,

I am writing to register my most strenuous objection to placing overhead lines adjacent to residences, roadways and//or otherwise open spaces when an upgrade to existing facilities would fulfill most of the project objectives. Changing out existing substation transformers for larger substation transformers at the same location is infinitely better than new construction that would degrade the aesthetics of our beautiful area. That property values and public health (sleeping nightly beneath 66,000 volts) would be negatively impacted is additional incentive to optimize existing resources. Respectfully, Dennis & Donna Broersma

1540 Calle Fidelidad Thousand Oaks, CA 91360 Phone 805-529-5309

3.3.12 Letter I12 – Responses to Comments from Dennis Broersma

- I12-1 The commenter expresses support for an alternative that would upgrade existing SCE facilities. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative B and System Alternative A.
- I12-2 The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials* for an analysis on safety, and Master Response 2, *Non-CEQA Issues* in Section 3.1.3 for a discussion on property values. Impacts to visual resources are addressed in Draft EIR Section 4.1, *Aesthetics*.

From:	Todesco, Mercedes [mercedes.todesco@jpmchase.com]
Sent:	Wednesday, October 26, 2011 9:08 AM
To:	Presidential Substation Project
Subject:	Presidential Substation Project DRAFT EIR / comment period extended?
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Green Category

Hello,

This is a follow up to my voice message. I am a party in the CPUC proceeding for the Presidential Substation Project Application A08-12-023. At the Pre-Hearing Conference on Oct. 18, 2011, it was requested that the comment period to the DRAFT EIR be extended from the Oct. 31, 2011 deadline. The website only shows the Oct. 31 deadline. Has an extension to comment been granted, and if so, what is the new deadline? Thank you,

*** PRIVILEGED & CONFIDENTIAL ***

Mercedes Todesco | Paralegal | Legal & Compliance, Litigation | JPMorgan Chase Bank, N.A. | 9200 Oakdale Ave., 7th Floor, Mail Code CA2-4383, Chatsworth, CA 91311 | 818-775-8572 Direct | 818-349-2734 Fax | mercedes.todesco@jpmchase.com

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3.3.13 Letter I13 – Responses to Comments from Mercedes Todesco

I13-1 See Response I6-6.

From:	Jennie Crowley [jenniecro@gmail.com]
Sent:	Friday, October 28, 2011 8:41 PM
To:	Presidential Substation Project
Subject:	Comments on SCE Presidential Substation
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Green Category

Dear Ms. Mosley/Commissioner,

I am a residence at Sunset Hills in Thousand Oaks, California. Recently one of our neighbors brought this project to our attention. We attended the public hearing on October 13, 2011 and we would like to express our concerns via this email. Please confirm the receipt of this submission by email.

First, based on the information provided during the hearing, it seems that the usage of the current station is only about half of its capacity. It is good to be proactive and try to prepare for the future, but proactive planning also needs to be rational and smart. At this point, what the future demand would be is not clear, so it is premature to look at the expansion and a new station.

Second, a new construction of this magnitude usually comes with negative impact, no matter which proposals/alternatives are being used. We are especially concerned with safety and health issues, city appearance and property values, which, we were told,were not considered in the environment impact report. In the current economic situation, home values are important, even critical, to many homeowners in the area. We sincerely hope and strongly urge decision makers investigate these impacts thoroughly before the final decision

Third, we would like to see more options considered/proposed than what's in the current plan. What about expanding the current station? What about underground lines?

We sincerely hope you consider residents' input and make a wise decision for our city.

Best regard,

Jennie Crowley 805-367-6592

3.3.14 Letter I14 – Responses to Comments from Jennie Crowley

- I14-1The commenter expresses concerns about future demand and is referred to Master
Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand and
Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need.
- I14-2 For issues related to how the Proposed Project would affect health and safety, please refer to Draft EIR Section 4.8, *Hazards and Hazardous Materials*. Regarding visual resources, see Draft EIR Section 4.1, *Aesthetics*. The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- I14-3 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on the range of alternatives considered in the Draft EIR, including two alternatives that would expand existing substation facilities (Alternative Substation Sites A and B). For a discussion on undergrounding, see Master Response 3, *Undergrounding*, in Section 3.1.3.

From:	harrinde@gmail.com on behalf of Donald Harrington [harrinde@ieee.org]
Sent:	Friday, October 28, 2011 8:12 AM
To:	Presidential Substation Project
Subject:	Support of Environmentally Superior Alternative
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Green Category

October 28, 2011

Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954

Attn: Presidential Substation Project

Ms. Mosley:

I am writing in support of the Environmentally Superior Alternative concept identified in the proposed Presidential Substation project.

The three surrounding cities of Thousand Oaks, Simi Vallley, and Moorpark have take great lengths for many years to preserve the character of the Tierra Rejada Valley through open-space protection and aesthetic investments along city-owned streets and walkways. The project as proposed by SCE would dramatically degrade the character these cities have worked so hard to preserve and develop.

SCE has an excellent reliability and operation reputation and I am confident in their technical ability to develop a plan that meets the needs of their customers; providing reliable electric power while preserving the character of the communities in which they operate.

Sincerely, Donald Harrington, Electrical Engineer 876 Warren Cr Moorpark, CA 93021

3.3.15 Letter I15 – Responses to Comments from Donald Harrington

I15-1 The commenter expresses support for System Alternative B, and opposition to the Proposed Project for aesthetic reasons. Comment noted. For issues related to how the Proposed Project and alternatives would affect visual resources, see Draft EIR Section 4.1, *Aesthetics*. Regarding System Alternative B, see Master Response 1, *Alternatives* in Section 3.1.1.

From:	Charlene & Arnie [chararnie@sbcglobal.net]
Sent:	Sunday, October 30, 2011 3:30 PM
To:	Presidential Substation Project
Cc:	citymanager@simivalley.org
Subject:	Alternative B
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Green Category

We are residents of Simi Valley living below the Reagan Presidential Library in Wood Ranch. There has been much discussion & objection to Edison's proposed powerline project. The negative impact it would have on the surrounding areas should be reason enough to rethink this project. While understanding the need to keep up with power demands we nevertheless believe this can be acheived without installing above ground power lines. If Edison finds that underground utilities are beyond it's fiscal capabilities, then they should seriously consider the alternative plan to upgrade existing transformers. The environmental impact of above ground powerlines is completely unacceptable.

Mr. and Mrs. Arnold P. Sodergren 420 Lazy Brook Ct. Simi Valley, Ca. 93065

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3.3.16 Letter I16 – Responses to Comments from Arnold Sodergren

I16-1 The commenter is referred to Master Response 1, *Alternatives*, in Section 3.1.1, and Master Response 3, *Undergrounding*, in Section 3.1.3.

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Scharlotte Watters Commenter Address: 1590 Calle artigas) Thousand Oake 11360 Ca. Naft EIR Public Comment: 2 attended Outo per 13,201 apertin on I have (8/29/087 Alexander - the D Ron-A. 9/25/10 te on the orner of Olgended. eda on alses proceed a Blimotaly 35 Kd. mar all under 10 QA BEACH anere When would Al 117-1 :07 in Adia 870 auth techel Now property dentor 10ul dand. toneourun Xd meures lop of the the wepdown backwarde by there 201 Mores exery 0 lexdersta CAR3 cressail as to monor What m DIAT 117-2 The exission 11 1.00 Part vou AAL. 117-3 chorac Solen Rould The - Ota meal YOUR OX had deleged Y polan 10 117-4 thes pro UMALI 10 not n Respondent anthe desperat for 2) Not Gal est- It was also pro our attestion at neel l17-5 Palante au electrit, hos a randy TheThe est spould ersing eratine for 240 Ale I17-6 efiction Dubstations projec Morand. is environmentally would Jealtha leronelle OIL U プル sayaet should allowed Rustaners Been to 1.0.0 1.01

3.3.17 Letter I17 – Responses to Comments from Charlotte Watters

- I17-1 The commenter expresses opposition to Alternative Subtransmission Alignment 2 for aesthetic reasons, and support for undergrounding of the proposed subtransmission alignment. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Comment noted. For an evaluation of visual impacts, see Draft EIR Section 4.1, *Aesthetics*. For a discussion on undergrounding, see Master Response 3, *Undergrounding*, in Section 3.1.3.
- 117-2 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted. For a discussion on property values, see Master Response 2, *Non-CEQA Issues*, in Section 3.1.2. Regarding issues pertaining to health and hazards, including fire, see Draft EIR Section 4.8, *Hazards and Hazardous Materials*. For a discussion of emissions, see Draft EIR Sections 4.3, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*. For a discussion on concerns about earthquakes, see Response 117-3.
- I17-3 As discussed in the Draft EIR discussions for Impacts 4.6-1 and 4.6-2 (see Draft EIR page 4.6-17 and 4.6-18), the potential for the proposed aboveground subtransmission lines and poles to collapse due to surface rupture or strong ground shaking during an earthquake would be low due to modern engineering of the proposed subtransmission line and poles. For additional information, see Draft EIR Section 4.6, *Geology, Soils, Seismicity, and Mineral Resources*, and Draft EIR Section 4.8, *Hazards and Hazardous Materials* for an analysis on safety.
- 117-4 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for an analysis of an alternative energy alternative, and electrical demand. See Master Response 2, *Non-CEQA issues*, in Section 3.1.2 regarding project need.
- I17-5See Master Response 1, Alternatives in Section 3.1.1 regarding electrical demand and
Master Response 2, Non-CEQA Issues in Section 3.1.2 for a discussion on project need.
- I17-6 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1, for a discussion of alternatives that would upgrade existing substations (System Alternatives A and B), and Master Response 3, *Undergrounding*, in Section 3.1.3.

Page 1 of 1

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I18-5

I18-6

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I18-9

 Subj:
 Presidential Substation Project

 Date:
 10/31/2011 9:07:01 A.M. Pacific Daylight Time

 From:
 Pooch4@aol.com

 To:
 presidentialsub@esassoc.com

October 31, 2011

Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954

Attn: Presidential Substation Project

Ms. Mosley,

I am writing in regard to my and my husband's opposition to having High voltage transmission lines running through our front yards on Read Road and along Sunset Valley Road. We are strongly urging you to support the NO LINES, NO SUBSTATION OPTION.

We feel that with the decreased power usage over the last 3 years, that SCE can not prove their claim of increased demand. In an email they send out, they state themselves that energy efficiency is expected to lower electricity consumption by 5 to 15%, peak demand by 7.5 to 15%. We also feel that they are turning a blind eye to the other alternative options. That of complete undergrounding through Read Road and Sunset Valley Road. They also have not considered the option of upgrading the existing substations such as Newbury Park, Oak Park and Santa Susanna.

They also have not made clear how much of our land they are planning to "seize" under the guise of imminent domain. This is of great concern to us, as we live along Read Road. They would have to remove trees that have existed on this route for well over 30 years. They would also have to do extensive reconstruction of walls, brick mailboxes and pilasters, driveways, electric gates and call boxes. They would possibly have to take out our orchard as well, depending on how much of an easement and "land grab" that they would require. It has recently come to our attention that the legality of their easement may be in question. We have lived on our property for 30 years, and this would irreparably change our neighborhood and our way of life and, not to mention, the value of our property.

SCE has not made clear to us the diameter and the height of the proposed power poles. Until they do, it is very hard to determine the environmental impact of this project. It's also very difficult to determine the impact this project would have on our lives. I do believe it would possibly be detrimental to our health as they can not prove that EMF's are not harmful to people or to animals.

We are also very concerned that these poles would be located on what is a very narrow road, and that they would pose a hazard to traffic, pedestrians and bicyclists. Our roads tend to become very congested at certain times of the year, as Underwood Family Farms has become a very popular place for families to visit. They come from as far away as Los Angeles and Pasadena. It's a wonderful place to bring children and give them the opportunity to experience farm life.

We would like to invite you, and whomever is going to be making this decision, to visit our neighborhood and meet here with the residents to see first hand how this project will have an impact on not only the residents, but also people who come here to enjoy this open space area. We are hoping that you will come to realize how unique this area is, and understand that these homes have been here since the 1970's and are located on what was once the Joel McCrea Ranch. The uniqueness of this area needs to be preserved for future generations.

Again, I urge you to support the No Lines and No Substation option. However, if SCE continues with this project, please support complete undergrounding of the high voltage power lines or an alternative site for the substation.

Thank you for your time sharon Allagone Sincerely Jon and Sharon Fleagane 4954 Read Road Moorpark, California 93021

Gom Cleagane

Monday, October 31, 2011 AOL: Pooch4

3.3.18 Letter I18 – Responses to Comments from Jon and Sharon Fleagane

- I18-1 The commenter expresses concerns about future demand and is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand forecasting.
- 118-2 The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternatives A and B, and Alternative Subtransmission Alignment 4. See also Master Response 3, *Undergrounding*, in Section 3.1.3.
- 118-3 The commenter expresses general concern about eminent domain, tree removal, orchard removal, and modifications to residential structures. No eminent domain actions are proposed by the Proposed Project. Additional overhang easements may be required, as described above in responses I5-5 and I5-6. For a description of existing and new easements required for construction of the Proposed Project, the commenter is referred to Draft EIR Section 2.6, *Rights-of-Way Requirements*. For a description of general vegetation clearing requirements and tree trimming guidelines, see Draft EIR Chapter 2, Section 2.9, *Project Operation and Maintenance*. See Response A14-30 for additional information related to tree removal and an arborist report submitted for the Proposed Project. For a discussion of temporary and permanent disturbance to farmland, see Draft EIR Section 4.2, *Agriculture and Forestry Resources*. Consistency of the Proposed Project with local land uses is analyzed in Draft EIR Section 4.10, *Land Use and Planning*.
- I18-4 The commenter is referred to Master Response 2, Non-CEQA Issues in Section 3.1.2 for a discussion on property values and Response I18-3 above for a discussion on eminent domain, tree removal, orchard removal, and modifications to residential structures.
- I18-5 The commenter is referred to Draft EIR Figures 2-8 and Figures 2-9a through 2-9f for specifications on pole diameter and height.
- I18-6 The commenter's opinion that project-related EMF would be detrimental to health is noted. Also, refer to Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- I18-7 The proposed alignment of poles along Read Road would be setback from the travel way used by autos, pedestrians and bicyclists, and would not introduce safety hazards or access restrictions for those people using Read Road. See Response I37-3 regarding the effect of the Proposed Project on people traveling to Underwood Family Farms.
- I18-8 The commenter invites the CPUC decision-makers to visit the project area and meet with the residents to appreciate the unique quality of the area. The comment is noted.

I18-9 The commenter expresses support for System Alternative B and undergrounding the subtransmission line. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 3, *Undergrounding* in Section 3.1.3.

Comment Letter I19



3.3.19 Letter I19 – Response to Comment from Martin Josephson

I19-1 The commenter is referred to Master Response 2, Non-CEQA Issues in Section 3.1.2 for a discussion on project need, SCE rate increases and fees. See Master Response 1, Alternatives in Section 3.1.1.for a discussion on electrical demand, alternatives-related issues including demand-side management alternatives, and alternatives to upgrade existing substation facilities (System Alternatives A and B). Regarding undergrounding, see Master Response 3, Undergrounding, in Section 3.1.3.

05:47:52 p.m. 10-31-2011 2 Comment Letter 120-2 /3 37.51



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Public Comment Card]
Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm	
Commenter Name: <u>Gabriel Scally</u> -Silvia Scally.	
Address: 1577 Colle Artigas - Thous Oaks CA-91360	
Comment:	
This is more than aesthetics. For many reasons	
home owners loose value of our properties !! Which	120-1
is a VERY SERIOUS MATTER!!!	
This is not how a democratic country and State	
phould treat "the people".	
Bis substation projects need to be addressed with "mainimum" inspact ou the lives of the people of surrounding neighborhoods!	
We will start a movement to describe and shows people	
of other States what is happening in California -	

3.3.20 Letter I20 – Response to Comment from Gabriel and Silvia Scally

The commenter expresses general opposition to the Proposed Project for reasons pertaining to aesthetics, property values, and health. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Regarding impacts to visual resources and health and safety, see Draft EIR Sections 4.1, *Aesthetics*, and 4.8, *Hazards and Hazardous Materials*, respectively. Regarding impacts to property values, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
From: Mercedes Todesco and Family P.O. Box 941912 Simi Valley, CA 93094 Homeowners on Read Rd, known as the "Blue House"

October 29, 2011

VIA EMAIL: presidentialsub@esassoc.com and FAX: (415) 896-0332

To: Presidential Substation Project c/o Environmental Science Associates 225 Bush Street, Suite 1700 San Francisco, CA 94104-4207

Re: DRAFT EIR Written Public Comments re Presidential Substation Project

We support the DRAFT EIR's determination that System Alternative B (upgrade of existing substations and leave existing power poles as they are) is the superior alternative and we have no objection to it. However, we do have serious concerns about the other alternatives, which I submit herein to supplement my verbal comments from October 13, 2011.

Public Health and Safety Dangers

- The power lines create a serious danger to human life and property. The proximity of these lines to our home would result in high voltage lines encroaching and spanning over to *within feet* of our home and windows' edge. *People live here- children play, eat and sleep here*. The close proximity of such high voltage to our home is unacceptable.
- 2. Read Rd is a very narrow road. We are concerned by the dimensions of the power poles' base and height, and how they will impact and interfere with access to our home and along Read Rd as it is the only access in and out of the community.
- 3. Above ground transmission lines are more susceptible to environmental forces, such as high winds and earthquakes. And considering the high voltage the proposed lines would carry, threats of downed power lines are an even more alarming danger to public safety.
- 4. The high voltage lines would create an extreme fire hazard in a high risk area and threaten human life and property (i.e. from electric sparks and arcing) and would lead to massive property loss in the surrounding community.
- 5. Exposure to high voltage lines is linked to noise-induced hearing loss and interferes with cochlear implants, epidural spinal stimulators and other life saving electric devices implanted in the body, such as pacemakers.
- 6. SCE's dismissal of EMF exposure continues to be disappointing. EMF exposure risk is still debated in the medical field. It is a real issue for us and our children and it must be sufficiently addressed.

Negative Physical and Psychological Impacts

7. High voltage lines would create constant noise pollution, i.e. "zapping" and "buzzing" noises. The increased noise would be terribly disturbing and would create constant fear and anxiety as to whether a problem was occurring outside/overhead that could risk the family's safety. The lines were not this way when we built the home- it is improper to force them onto us now.

Continued next page...

Aesthetic / Quality of Life Issues

8. The above ground power lines would be a hideous eyesore and would totally destroy and distort the natural scenic view of this prestigious area.

Suggestions to the CPUC and SCE:

A. Adopt the environmentally superior alternative System Alternative B, the upgrade of existing transmission lines and leave existing power lines as they are.

If the environmentally superior alternative System Alternative B is not accepted, then we request a new EIR report be circulated with a new comment period along with the following:

- B. Underground the lines, especially at our home and along Read Rd, which would both mitigate the health/safety hazards and proximity issues and preserve the scenic beauty of this prestigious greenbelt buffer zone which the cities of Thousand Oaks, Moorpark and Simi Valley have been fighting to protect for decades. SCE is in the best position to bear the cost of placing the transmission lines underground, as it can spread the cost over a larger number of customers and recoup the cost over time.
- C. Eliminate the need for the project entirely, by implementing conservation programs and if necessary, impose higher tiered rates for excessive usage to trigger conservation by consumers.
- D. Further explore alternative design plans and routes.

3.3.21 Letter I21 – Responses to Comments from Mercedes Todesco

- I21-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. See Draft EIR Section 4.8, *Hazards and Hazardous Materials*, for a discussion on health and safety.
- I21-2 See Response I18-7 regarding the effect of the proposed poles along Read Road on access and use of the road. The commenter is also referred to Response I5-12 for a discussion on Read Road and Draft EIR Figure 2-8 for specifications on pole diameters and heights.
- I21-3 As disclosed in the Draft EIR discussions for Impacts 4.6-1 and 4.6-2 (see Draft EIR page 4.6-17 and 4.6-18), the potential for the proposed aboveground subtransmission lines and poles to collapse due to surface rupture or strong ground shaking during an earthquake would be low due to modern engineering of the proposed subtransmission line and poles. With regard to hazards associated with strong winds and downed power lines, distribution and transmission systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over, and if a structure does blow over, the protection system on a subtransmission line is designed to shut off power flow in a fraction of a second. The commenter is also referred to Draft EIR Section 4.6, *Geology, Soils, Seismicity, and Mineral Resources* and Section 4.8, *Hazards and Hazardous Materials*. Also, Response I17-3 provides additional information on hazards due to ground shaking.
- I21-4 The commenter does not comment on the adequacy or accuracy of the Draft EIR. The commenter expresses concerns about the safety of overhead power lines and provides details regarding incidences where power lines have caused fires. As disclosed in the Draft EIR discussion for Impact 4.8-6 (see Draft EIR page 4.8-22), the implementation of Mitigation Measure 4.8-6 would reduce the potential for wildland fires associated with construction and maintenance of the Proposed Project to less than significant. The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials* for further discussion and analysis of fire hazards.
- 121-5 The CPUC is not aware of any link to noise-induced hearing loss associated with high voltage power lines. As described on Draft EIR page 4.11-17, corona noise that would be associated with the proposed subtransmission line would be less than 37 dBA directly under the line, which would be less than ambient noise levels in the area (see *Existing Ambient Noise Environment* discussion in Draft EIR Section 4.11.1).

Cochlear implants, epidural spinal stimulators, and pacemakers are referred collectively as active implantable medical devices (AIMDs). AIMDs are usually comprised of a small battery-powered box with electronic circuitry and leads, electrodes, and/or sensors that detect a biological function or deliver a stimulus (National Grid, 2013).

Pacemakers are by far the most common types of AIMDs and are designed to sense the heart's electrical activity and deliver an appropriate form of electrical stimulation to the heart when necessary (National Grid, 2013).

EMFs associated with some transmission lines can affect the operation of older model pacemakers by causing them to revert to asynchronous pacing. Cardiovascular specialists do not consider prolonged asynchronous pacing to be a problem: periods of operation in this mode are commonly induced by cardiologists to check pacemaker performance. With dual-chamber pacemakers, inappropriate pacing has been documented before unit reversion to asynchronous mode (EPRI, 1997). Depending on the manufacturer and design, the magnetic field threshold for pacemaker interference, including the possibility of inappropriate pacing, is in the range of 2 to 12 Gauss (G), and the electric field threshold is about 1.5 kilovolts/meter (kV/m) for some of the more sensitive dual-chamber units, and above 2.0 kV/m for older ventricular units (EPRI, 1997).

Based on the magnetic field data included in SCE's Field Management Plan (see Draft EIR Appendix B) for the Proposed Project, it is estimated that the maximum magnetic fields that would occur directly under the proposed subtransmission line would be less than 0.004 G. Based on electric field data for typical 66 kV subtransmission lines, it is estimated that the maximum electric field that would occur directly under the proposed substation transmission source line routes in new corridors would be approximately 0.9 kV/m (National Grid, 2011). Therefore, the EMFs associated with the Proposed Project would not result in pacemaker interference.

- I21-6 The commenter's desire for EMF exposure risk to be sufficiently addressed in the EIR is noted. Refer to Section 3.1.2, Master Response 2, *Non-CEQA Issues* for a discussion of how the CPUC addresses EMF in the CEQA review documents.
- I21-7 The commenter's opinion that the subtransmission line noise (referred to as corona discharge noise in the Draft EIR) that would be generated by the Proposed Project would be disturbing and create fear and anxiety is noted. As described on Draft EIR page 4.11-17, corona noise that would be associated with the proposed subtransmission line would be less than 37 dBA directly under the line, which would be less than ambient noise levels in the area (see *Existing Ambient Noise Environment* discussion in Draft EIR Section 4.11.1).
- I21-8 The commenter opposes the Proposed Project for aesthetic reasons. The commenter is referred to Draft EIR Section 4.1, *Aesthetics*, which analyzes visual impacts from the Proposed Project. The commenter is also referred to Master Response 3, *Undergrounding*, for additional information on the feasibility of this alternative.
- I21-9 The commenter expresses support for System Alternative B or undergrounding the subtransmission line in conjunction with conservation programs. The commenter is referred to Master Response 1, *Alternatives*, in Section 3.1.1 regarding alternatives

considered for the Proposed Project, including energy conservation, and Master Response 3, *Undergrounding*, in Section 3.1.3. The commenter's suggestion of imposing higher tiered rates for excessive use to trigger conservation by consumers is not a CEQA issue but is noted. Marc G. Reich, Esq.; mgr@reichradcliffe.com Beth S. Kuttler, Esq.; bsk@reichradcliffe.com REICH RADCLIFFE & KUTTLER LLP 4675 MacArthur Court Suite 550 Newport Beach, CA 92660 Telephone: (949) 975-0512 Facsimile: (949) 975-0514

Attorneys for Party Jose R. Valdez

BEFORE THE PUBLIC UTITITLIES COMMISSION OF THE STATE OF CALIFORNIA

IN THE MATTER OF THE APPLICATION OF)	
SOUTHERN CALIFORNIA EDISON COMPANY)	
(U338E) FOR A PERMIT TO CONSTRUCT)	
ELECTRICAL FACILITIES WITH VOLTAGES)	
BETWEEN 50 kV AND 200 kV: PRESIDENTIAL	Ĵ	
SUBSTATION PROJECT)	Proceeding No.: A08-12-023
	2	Contraction of the state of the

COMMENTS FOR CONSIDERATION RE: DRAFT ENVIRONMENTAL IMPACT REPORT

These Comments are being submitted on behalf of Protestant Jose R. Valdez in response to the Draft Environmental Impact Report ("DEIR.") Mr. Valdez presents the following comments for consideration by the California Public Utilities Commission ("CPUC") in making a determination regarding the Presidential Substation Project:

1. The DEIR identified System Alternative B as the Environmentally Superior Alternative to the Presidential Substation Project. **Mr. Valdez endorses System Alternative B**; however, the DEIR suggests that "[a]dditional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment could need to be upgraded." [DEIR, p. ES-13] To the extent that new or upgraded distribution equipment is necessary, the scope of the DEIR is flawed in not providing the exact locations of the affected 16kv distribution equipment, the proximity to existing residences or the overall physical environmental impacts of the same. Moreover, while in the DEIR Public Meeting on October 13, 2011, it was represented that this Alternative was confirmed as feasible by the environmental consultants' electrical engineers, the DEIR does not reference any of the information confirming that it is feasible. Therefore, the final DEIR should be forthcoming with this information.

2. Alternative Subtransmission Alignment 1 is unacceptable and the scope of the DEIR flawed in its consideration of this alternative. In its assessment of Alignment 1, the DEIR suggests "some areas along Read Road could require additional overhang easement rights to accommodate the pole crossarms." [Id., p. ES-10] The DEIR fails to consider the extent of the easements which would be required, and more importantly, the proximity of the required easements to the existing residences on Read Road and the resulting overall physical environmental impacts. To that end, the scope of the DEIR is flawed and does not comply with CEQA's legal and regulatory feasibility criteria. Alignment 1 also does not alleviate the significant unavoidable impacts on aesthetics. The scope of the DEIR is further flawed in that it does not consider the feasibility of undergrounding all subtransmission lines.

3. Alternative Subtransmission Alignment 2 suggests: "Poles located in a curve or corner along the alignment would require some form of guying to provide additional support. The number and locations of poles which would require additional support, has not been identified at this time. If support mechanisms could not be accommodated within the road ROW, SCE would be required to obtain additional ROW." [Id., p. ES-11] For the same reasons as Alternative Subtransmission Alignment 1, the scope of the DEIR is flawed in not identifying the exact nature and location of any additional ROW. It does not comply with CEQA's legal and regulatory feasibility criteria, does not alleviate the significant unavoidable impacts on aesthetics and does not consider the resulting overall physical environmental impacts of the additional ROW. The DEIR is further flawed in that it does not consider the feasibility of undergrounding all subtransmission lines.

4. Alternative Subtransmission Alignment 3 is unacceptable and the DEIR flawed in I22-6 scope as it does not consider the feasibility of undergrounding *all* subtransmission lines.

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5. According to the DEIR, "the objective of the Proposed Project is to build electrical facilities necessary to maintain safe and reliable electric service to customers, and serve the forecasted electrical demand in the Electrical Needs Area in the City of Thousand Oaks, the City of Simi Valley and unincorporated portions of Ventura County." [Id., p. ES-1] The DEIR relies on SCE's vague and ambiguous project objectives of "reliability" and "need" that are based on outdated information. Given that the project objectives are vague, the DEIR is flawed in its consideration of the Proposed Project and the Alternatives as there is no measurable way to determine whether the Proposed Project or any Alternative, including the No Projective Alternative, might meet the project objective.

6. Consistent with Item No. 5 above, the DEIR is flawed in scope in that it does not adequately consider the No Project Alternative in terms of updated projected forecasts and actual electrical usage in the ENA. Accordingly, the DEIR fails to provide a complete analysis of the impacts of the No Project Alternative.

7. The DEIR is flawed in scope as it does not give sufficient consideration to the changes that have occurred since SCE's 2008 PTC such as energy conservation programs, solar installations, Smart Connect Impact, Green House Gases Reduction Program, etc. as they relate to updated projected forecasts and actual electrical usage in the ENA rather than outdated information contained in the PEA.

8. The exact location of the subtransmission lines, easements, ROW and related tree removal has not been defined, and therefore, the environmental impact is not known as to the Proposed Project or any of the suggested Alternatives other than perhaps System Alternative B. While there have been various references to 10-foot and 20-foot diameters, it has not been clearly defined as to whether this is from the base or the arms. In addition, the base size has not

been defined. Without such qualitative information, the DEIR is flawed in scope in that it does not analyze the full environmental impact of the Proposed Project or Alternatives.

9. The Distributed Alternative analysis is incomplete and should not have been eliminated from full consideration in the DEIR. In the three years since the PEA, there have been over 10MW of projects completed or expected to be completed within the planning period. These are known and approved projects which exist as alternatives to off-load demand required from the Moorpark substation. SCE excluded these alternatives in the PEA, and the DEIR is incomplete and flawed without analyzing this alternative. The known projects in the Distributed Alternative can be combined with the System Alternative A (standard upgrades) to extend the ENA capacity to meet the expected demand. Accordingly, the DEIR does not comply with CEQA's legal and regulatory feasibility criteria in not fully considering this Alternative.

10. The DEIR is flawed in scope in that it does not address the *significant, unavoidable* and *permanent* aesthetic, noise, traffic, public health and safety, visual resources, biological resources and land use impacts of the Proposed Project or any Alternatives, especially as they pertain to the residents on Read Road and Sunset Valley Road. For example, the DEIR does not consider the impacts of the location and size of the distribution poles in relation to residences, the impact on land values, the loss of land and quality of life for those residents, and the overall affect on health and safety.

Respectfully submitted,

Dated: October 31, 2011

REICH RADCLIFFE & KUTTLER LLP

in A

Beth S. Kuttler, Esq., Attorneys for Protestant, Jose R. Valdez I22-11

I PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My primary business address is 4675 MacArthur Court, Suite 550, Newport Beach, CA 92660.

On the date indicated below, I served the foregoing document(s) described as:

COMMENTS FOR CONSIDERATION RE: DRAFT ENVIRONMENTAL IMPACT REPORT

on the interested parties in this action as follows:

Ms. Juralynne Mosley Presidential Substation Project c/o ESA 1425 N. McDowell Blvd., Suite 200 Petaluma, CA 94954 Email: presidentialsub@esassoc.com

BY MAIL: By placing a true copy thereof, enclosed in a sealed envelope, addressed as indicated above.:

[X] I placed such envelope for deposit in the U.S. Mail for service by the United States Postal Service, with postage thereon fully prepaid.

BY EMAIL

[X] As follows: My email address is <u>bsk@reichradcliffe.com</u>. On the date indicated below, I emailed the document(s) to the persons listed above at the email addresses listed above. My email system indicated that the transmissions were complete and without error.

 [X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 31, 2011, at Costa Mesa, California.

Beth S. Kuttler

3.3.22 Letter I22 – Responses to Comments from Reich Radcliffe and Kuttler LLP

- I22-1 The commenter expresses support for System Alternative B and states that the Draft EIR does not contain adequate information and details about this alternative. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for information on alternatives, their consideration in this EIR, and System Alternative B.
- 122-2 The commenter expresses concerns with Alternative Subtransmission Alignment 1 and its analysis in the Draft EIR. Pursuant to CEQA Section 15126.6 (d), significant impacts caused by an alternative can be discussed at a lower level of detail than those caused by the Proposed Project. The commenter is correct in asserting that the level of detail contained in the Draft EIR associated with alternatives is less than the details provided for the Proposed Project. The alternatives analysis contained in the Draft EIR analyzes alternatives at the reduced level of detail afforded under CEQA Section 15126.6 (d) as details of the alternatives are not known at the same level of detail as the Proposed Project.

The commenter also cites details about potential overhang easements as lacking sufficient detail. Draft EIR Chapter 2, *Project Description* contains all details currently known to SCE and the CPUC. As described in Draft EIR Chapter 2, additional overhang easements may be required. The overhang easements would accommodate pole cross-arms and wires, which would be located above the land only. Such an easement would not result in or allow physical improvements on the ground and therefore would result in no physical or environmental impacts.

The commenter also states that the Proposed Project would result in significant, unavoidable impacts to aesthetics, which is fully described in Draft EIR Section 4.1, *Aesthetics*.

- I22-3 The commenter states that the Draft EIR is flawed in that it does not evaluate an alternative undergrounding the entire subtransmission alignment. The Draft EIR considers the feasibility of undergrounding all subtransmission lines in Chapter 3, *Alternatives and Cumulative Projects*, in the discussion of Alternative Subtransmission Alignment 4. The commenter is also referred to Master Response 3, *Undergrounding* in Section 3.1.3.
- I22-4 The commenter asserts that the description of Alternative Subtransmission Alignment 2 is insufficient as it fails to include all details about guying and necessary additional ROWs. See Response I22-2. CEQA Guidelines Section 15126.6 (d) requires that an EIR contain sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project and states that if an alternative would cause one or more significant effects in addition to those that would be caused by the project, the effect(s) shall be discussed, but in less detail than the

significant effects of the project. Draft EIR Section 3.4 contains all information and details known by SCE and the CPUC on project alternatives and the Draft EIR adequately analyzes the impacts of all project alternatives, including Alternative Subtransmission Alignment 2. Details not included in the description about additional ROW specifics are not required by CEQA. However, in an effort to provide as much information as possible, the following language has been added on page 3-18 of the Draft EIR:

Due to the curvatures in Olsen and Madera Roads, the subtransmission structures along this alignment could require additional support mechanisms such as anchors and guy wires, which could be located on both sides of the roadway. Poles located in on a curve or corner along the alignment would require some form of guying to provide additional support. Guying typically consists of a guy wire attaching a pole to a buried anchor or a shorter guy pole to provide additional stability. The use of a guy wire requires adequate space for the wire to attach to the ground at a location that provides adequate stability. Guy poles are used in situations where support is needed across a roadway or where space is constrained. In addition to reducing the lateral space needed to provide a pole added stability, guy poles provide the clearance needed for the safe passage of vehicles and can be used to avoid removing vegetation. To minimize the number of guy wires crossing the road, the subtransmission alignment would be designed to cross the roadway at certain locations so that most, or ideally all, of the guying would be located on the same side of the roadway as the subtransmission line. While overhead facilities could be located on both sides of the roadway in a given alignment, it would not occur such that facilities would run parallel to one another and clutter the road ROW on both sides.

- I22-5 The commenter states that the Draft EIR is flawed in that it does not evaluate an alternative undergrounding the entire subtransmission alignment. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 and Master Response 3, *Undergrounding* in Section 3.1.3.
- 122-6 The commenter asserts that Alternative Subtransmission Alignment 3 is insufficient as it fails to analyze undergrounding all subtransmission lines. Undergrounding all subtransmission lines was analyzed by Alternative Subtransmission Alignment 4, which was eliminated from full EIR evaluation, as described in Draft EIR Section 3.5.1. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for more information on Alternative Subtransmission Alignment 4 and Master Response 3, *Undergrounding* in Section 3.1.3.
- I22-7 The commenter asserts that the Proposed Project objectives are vague and therefore insufficient. See Responses A15-3 and A15-4. See Response I22-8 for a discussion on the No Project Alternative.

- 122-8 The commenter asserts that the No Project Alternative analysis is flawed as it does not include updated demand projections. As with all alternatives, the impacts of the No Project Alternative are compared to those of the Proposed Project. The No Project Alternative was based on the environmental setting that existed at the time the notice of preparation was published for the Proposed Project, i.e., February 17, 2009. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand.
- 122-9 The commenter asserts that the scope of the Draft EIR is flawed as it doesn't contain updated demand data and projections. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand, and Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need. The commenter is referred to Draft EIR Section 3.5.8, *Demand Management Conservation* and 3.5.9, *Renewable or Conventional/ Distributed Generation Energy Resources* for a discussion why the demand management and renewable energy were rejected from full consideration in the Draft EIR.
- 122-10 The commenter states that the Project Description does not contain adequate details, such as the exact location of subtransmission lines. The commenter is referred to Response A14-30 for a discussion on the arborist report submitted by SCE during the Public Comment period for the Draft EIR. For additional information about easement and right-of-way issues, see Responses I5-5, I5-6, I22-2, and I22-4. Draft EIR Section 2.6, *Rights-of-Way Requirements*, discusses existing and new easements required for construction of the Proposed Project. See Figure 2-8 for pole specifications, including base sizes for the various pole types proposed to be used by the Proposed Project. The commenter is also referred to Draft EIR Figure 2-9a through Figure 2-9f, which depicts the location of Proposed Project components including the proposed subtransmission alignment and approximate pole placement.
- I22-11 The commenter states that the Draft EIR does not adequately consider a distributed generation alternative. Distributed generation was evaluated in Section 3.5.9 and eliminated from full consideration in the EIR as distributed generation would still require an additional substation. The text has been clarified as follows on page 3-39:

Implementation of this alternative would not alleviate substation capacity in the ENA as distributed generation electricity would still utilize the existing distribution system. A Distributed Generation Alternative would involve deployment of distributed generation in the form of many small projects within the ENA at a pace more aggressive than SCE anticipates, or is projected in the Clean Energy Jobs Plan, which identified year 2020 as the target date for developing 12,000 MW of distributed energy. EvenHowever, even if distributed generation energy supply sources in the ENA were built, substation capacity would continue to be a limiting factor requiring additional infrastructure. Because the potential for, and timing of, distributed generation within the ENA is uncertain and would require additional substation capacity, this alternative was not carried forward for analysis.

I22-12 The commenter states that the Draft EIR is flawed in scope as it doesn't address significant, unavoidable impacts to aesthetics, noise, traffic, public health and safety, visual resources, biological resources, and land use. The Draft EIR contained a complete analysis of each resource area and identified significant, unavoidable impacts to aesthetics, air quality, and noise. The commenter is referred to Draft EIR Section 4.1, Aesthetics for a discussion of impacts of the Proposed Project on aesthetics and visual resources. For a complete analysis of noise impacts, see Draft EIR Section 4.11, Noise. The commenter is also referred to Section 4.15, Traffic and Transportation. See Section 4.8, Hazards and Hazardous Materials for a discussion on health and safety. Also see Sections 4.4, Biological Resources and 4.10, Land Use. The location of poles can be found in Draft EIR Figures 2-9 a through f and the dimensions of poles can be found in Draft EIR Figure 2-8. The commenter is referred to Master Response 2, Non-CEOA Issues in Section 3.1.2 for a discussion on property values. See Response I5-5 for a discussion on easements and Response I18-3 for a discussion on eminent domain. The quality of life of residents is outside the scope of CEQA.

NUMATION AT ATAM A FRAME	Public Comment Card	
OF THE GR	Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm	
Commenter Name: Jen for G Address: 4956	and all, DD3 ead Rood Thomsand cosks, CA (mailing address	is Mnogank OH 9902)
Comment: (1) PROPERTY VALUE: ^A I Savings of \$950,000 into pure We Walth a commin 2000 Navithe market has declined. Of FALL POWER LINE on the Wa CREATING SEVERE POWERLAGE A	PURENTIFED MY RANKH GR 1.5 in 2001 before provide have. My partner and I split up in 2009, but are g at 2,65 million, but it follows the day used we we have it listed at 1.89 with NO uppers and hav we have it listed at 1.89 with NO uppers and hav word attracting a buyor. The bank appraved it envolute ouspessed as I for NO UNDER WORKING g	ntup q placed all of my tice to thus Frequency as to cluse. We this pand wg KSUB at 145! This playfed is NEW TO MARE ON WARMY UP
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PUBLIC COMMENT CARD

Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011

Commenter: Name: Jennifer Crandall, DDS

Address: 4956 Read Road Thousand Oaks, CA (mailing postoffice address is Moorpark, 93021)

Comment: I live on a 5 acre beautiful equestrian estate on Read Road which the SCE is recklessly proposing large steel poles and sub-transmission lines without proving a need for the project nor proposing alternatives with less impact to the rural scenic beauty, the wildlife, and the home values.

THERE IS NO PROVEN NEED FOR THIS PROJECT. THEREFORE, NO LINES AND NO SUBSTATION IS THE CORRECT SUPERIOR ENVIRONMENT ALTERNATIVE OPTION. The SCE was reckless with its hypothetical projection of increase electric needs for the area that they projected out from 2008 to 2012. It is now 2011, and the ACTUAL demand needed was substantially less than the 3-4 years than they predicted and thus wrongly and recklessly proposed this substation and higher voltage lines and steel poles. They gave a big campaign at the onset of this proposal advertising that 'the SCE is a company we can trust'. This actual usage for the past 3 years is not disclosed in the EIR and the SCE is trying to keep the truth from us. Once these large steel towers go up, they will never be coming down, and they will be destructive dinosaurs to our beautiful Tierra Rejeda Valley. The SCE has already began charging us for this project even though it hasn't been built, and they has placed the same initial charges two years in a row which is fraudulent.

THIS PROPOSED PROJECT HAS MADE IT AN EXTREME HARDSHIP TO SELL MY PROPERTY. My ranch was for sale the year the signs for the project went up and place a foot away from my for sale sign (see attached photo). I could not get any specifics from the SCE to disclose to potential buyers and this whole pending power line proposal destroys my possibilities to sell my home. Would you buy a ranch estate with this project pending along its front yard and entrance??? Thus, IT HAS CREATED A LARGE DISCOUNT IN THE PRICE ON TOP OF THE PRICE REDUCED FROM THE ECONOMIC DOWNTURN. THE STEEL TOWERS AND LINES WILL BE LESS THAN 100 FEET TO MY BEDROOM WINDOW AND MY FRONT DOOR.

THE SCE DOES NOT HAVE LEGAL EASEMENT FOR SUBS-TRANSMISSION LINES AT THE FRONT OF MY PROPERTY LINE. The SCE has a narrow easement for distribution lines and poles. The horizontal members of steel towers would cross over my property line and the easement would be violated along with my LEACH FIELDS FOR MY SEPTIC WOULD BE INVADED AT THE FRONT OF MY PROPERTY. There is no other place to put the leach fields for the two septic systems since my ranch is on a slope and terraced. The front 1/4 of the 5 acres is the lowest point. THERE IS ALSO AN ABANDONED WELL THAT IS ON THE FRONT CORNER OF THE PROPERTY LINE THAT WOULD BE INVADED. These two issues not only pose a severe environmental impact, but they create disastrous conditions in relation to my property

PUBLIC COMMENT CARD

value. THE DEIR DOES NOT IDENTIFY THE VAULT AREAS THAT ARE NEEDED IN ADDITION TO THE EDGE OF THE ROAD EASEMENT. The SCE is again being reckless by the fact they haven't done their homework.

Attached is a photo of the tree-lined fence line of my property and Read Road. READ ROAD IS A DESIGNATED SCENIC ROUTE IN THE COUNTY OF VENTURA, these proposed steel structures destroy the beauty of this designated route and belong besides freeways or industrial areas.

ALL THESE TREES WILL BE DESTROYED IN THE PROCESS OF THE PROJECT. Whether its the trenching and tunneling for laying the lines underground, or the 30 feet deep holes that are dug, either digging WILL DESTROY THE ROOT SYSTEMS and therefore the trees. THESE TREES HOUSE MANY SPECIES OF BIRDS AND ANIMALS including red-tail hawks and big horned owls. The project therefore creates a severe environmental impact 100 feet from my front door and destroys the beauty of my front yard and entrance to my ranch. The DEIR does not evaluate this destruction properly by outlining which trees will be destroyed nor the envelop on digging needed.

Another large environmental impact this SCE transmission line project will create is A LARGE SAFETY HAZARD for the equestrians here. I am 53 years old and train young horses 25 yards from the current distribution lines and Read Road. Horses are extremely sensitive to noise and vibration. I can not ride during the times the trees are getting trimmed as the horses are too frightened. THIS PROJECT WILL MAKE IT EXTREMELY DANGEROUS TO TRAIN MY HORSES, AND FOR MY BOARDERS AND TRAINER. IT WILL AFFECT MY BREEDING PROGRAM TOO. BETWEEN LOSS OF BROADERS AND BREEDING, IT WILL HAVE A DISASTROUS FINANCIAL IMPACT ON THE BUSINESS REVENUES AS WELL A LARGE SAFETY ISSUE.

READ ROAD IS A NARROW ONE LANE SCENIC ROAD WITH NO OUTLET, JUST ONCE SOURCE OF INGRESS AND EGRESS. This project creates an increased risk of fire hazard and safety concerns.

READ ROAD IS A DESIGNATED BICYCLE ROUTE with not even a bike lane nor two lanes for cars. AND, the shoulder of Read Road is actually the easement that SCE holds for distribution poles and wires. There is no shoulder for parking on Read Road! INSTALLING STEEL TOWERS AND THE PROCESS OF THE PROJECT WILL MAKE IT DANGEROUS FOR THE BICYCLISTS AS WELL AS RUIN THEIR ENJOYMENT OF THEIR ROUTE. AGAIN, THESE TOWERS BELONG ALONG HIGHWAYS OR AN INDUSTRIAL AREA, NOT ALONG A DESIGNATED SCENIC RURAL COUNTRY LANE WITH ESTATE HOMES, NOT ALONG A BICYCLE ROUTE, NOR THE DESIGNATED EQUESTRIAN BRIDLE PATHS THAT GO ALONG THIS ROUTE. THIS WHOLE PROJECT IS A HUGE VIOLATION OF ALL THAT WE NEED TO PROTECT.

THE EIR IS INSUFFICIENTLY DONE SINCE: 1) IT NEEDS TO ADDRESS ALTERNATIVE ENERGY RESOURCES THAT ELIMINATES ANY FUTURE NEED FOR SUCH A PROJECT AS THIS. 2)THE EIR NEEDS TO ADDRESS NO PROJECT AS AN ALTERNATIVE. THE EIR NEEDS TO ADDRESS PUTTING ALL LINES

PUBLIC COMMENT CARD

UNDERGROUND IF A NEED CAN BE PROVEN. 3)THE DEIR HAS IGNORED THE SOLAR ENERGY CHANGES THAT HAVE OCCURRED SINCE 2008. 4)IT HAS NOT MAPPED OUT THE TREE REMOVAL AND LOSS THAT WILL OCCUR WITH THE PROJECT 5)THE DEIR DOES NOT CONSIDER SIMPLE UPGRADES TO NEIGHBORING SUBSTATIONS TO HELP MEET ANY INCREASE DEMANDS.

We need a more careful and fully supervised approached to this project since all the alternatives have not been evaluated. Please do not allow SCE to continue with its expensive and reckless path to destroying our health, safety, home values, and beauty to our land that we so dearly need to preserve. Please consider ALL alternatives including the alternative of putting this on hold for 5 years to see if the demands ever get close to the wrong prediction they had during the last 3 years. There is no more build-able sites in Thousand Oaks. We are conserving energy more and more, as we all become more conscious of the expense and protecting our environment. We are upgrading our refrigerators, air conditioning, heating, light bulbs, all ...more and more. If there is no more building, we are all cutting costs, and increasing energy efficiency, it is wrong to predict such a surge upward in demand that warrants such a large project.

Un II



Photo 5: Moorpark Road and Tierra Rejada Road looking southeast across greenbelt



Photo 6: Tierra Rejada Road looking south down Sunset Valley Road



Photo 8: Highway 23 southbound approaching border of the City of Thousand Oaks looking south

Presidential Substation . 207584.02 Figure 4.1-2b Existing Settings

4.1-6

SOURCE: ESA, 2009



Photo 7: Read Road near intersection with Sunset Valley Road, looking east

> nota 2 bino rozat and no shoulder

My mail box Alasto Read Rosa, my bedroom and my front day is 100 ft from this point

3.3-69









LINES LEGG THAN BO FEBT FROM NERGHBR'S FRONT POOR.

ONLY ONE MEANS OF INGRESS/EGRESS



The SCE 3 alment rasement is only for distribution polo



3.3.23 Letter I23 – Responses to Comments from Jennifer Crandall

- I23-1 The commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- 123-2 See Response I5-5 and I5-6. Impacts to surface and groundwater are addressed in Draft EIR Section 4.9, *Hydrology and Water Quality*. The commenter does not make clear the specific way(s) in which the Proposed Project would potentially impact a septic system or leach field, as well as, more broadly, how this may subsequently impact the quality of surface water or groundwater. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- I23-3 See Response I5-10.
- 123-4 The commenter expresses concerns that the Proposed Project may encroach on an abandoned well on her property. SCE proposes to install the new poles along the same alignment as the existing poles (i.e., within the existing road ROW). No construction is proposed on the commenter's property. As discussed above, minor additional overhang easements may be required; however, no physical improvements would be located within the overhang easements and therefore the well would not be impacted. Further, as the commenter stated that the well is abandoned, there would be no encroachment issues with construction in the vicinity of the well. Typically, well setbacks are intended to prevent sources of pollution such as agricultural activities from contaminating the well. The Proposed Project would not cause such impacts on a well, even if the well was active.
- I23-5 Regarding Proposed Project impacts to Read Road, see Response I5-9. Regarding impacts to the Tierra Rejada Valley, see Response A5-5.
- I23-6 See responses to Comment I5-12 regarding traffic safety concerns on Read Road.
- I23-7 In regards to the comment letter text, see Responses I5-1 through I5-18. Regarding the comments written on or next to the submitted photos, the CPUC notes the information the commenter provides regarding current pole placement, signage, and ingress/egress on Read Road. These comments do not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR.

Comment Letter I24

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: GARY MORSE Commenter Address: 1589 CALLE ARTIGAS, THOUSAND OAKS, CALIF. Comment: THE PRESIDENTIAL SUBSTATION PROJECT IS UNNECESSARY AND WILL BE AN EVESORE TO OUR COMMUNITIES. THERE IS 124-1 NO DEMONSTRABLE NEED FOR THE NEW SUBSTATION TO BE BUILT AND IT'S EFFECTS ON THE AREA RESIDENTS ARE ALL NEGATIVE. THIS PROJECT NEEDS TO BE ABANDONED. IF TRULY NECESSARY 124 2 S.C.E. CAN IMPOVE THEIR EXISTING ELECTRICAL BOOSTING THE CAPACITY OF EXISTING SUBSTATIONS IN THE AREA.

3.3.24 Letter I24 – Responses to Comments from Gary Morse

- 124-1 The commenter opposes the Proposed Project for aesthetic reasons. The commenter is referred to Section 4.1, *Aesthetics*, which analyzes visual impacts from the Proposed Project. The commenter also expresses concerns about future demand and is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand and Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need. This comment is noted.
- I24-2 The commenter expresses support for an alternative that would upgrade SCE's existing substations. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1, which discusses two such options: System Alternative A and System Alternative B.

From:	Ginger Brandenburg [moneydoc@verizon.net]
Sent:	Thursday, November 03, 2011 9:54 AM
To:	"presidential sub"@esassoc.com
Subject:	Possible Power Poles along Olson Road near Erbes
Categories:	Green Category

To Whom It May Concern,

I am a 42-year resident of Sunset Hills in Thousand Oaks. I am a very concerned citizen if what I've been told is true...that there is a proposal to install power poles along Olson Road. Here are a few of my thoughts on the subject:

- Is this truly needful during these times of financial hardship?
- Who is to benefit from our sacrifice?
- Why should our home values, especially as it relates to our view lots, be negatively affected?
- Shouldn't we be looking into solar energy instead of the old-fashioned power poles?
- Olson Road is a popular thorough fare for commuters on their way to the freeway, radio transmission will be affected.
- Also, the beauty of the Sunset Hills Country Club should not have to be adversely affected as well.

| 125-2

125-1

I'm hopeful that our dedicated Thousand Oaks City Council will protect our property values and make a reasonable and proper decision on this ridiculous proposal.

Ginger Brandenburg 1547 Calle Fidelidad Thousand Oaks, CA 91360

3.3.25 Letter I25 – Responses to Comments from Ginger Brandenburg

- I25-1 The comment expresses concerns related to demand for the Proposed Project, property values, solar energy, and radio interference. Please see Master Response 2, *Non-CEQA Issues*, in Section 3.1.2 for a discussion on property values, and see Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion of solar energy and electrical demand. With regard to radio transmission being affected for commuters along Olsen Road on their way to the freeway, the comment is noted; however, there is no evidence to indicate this to be a valid environmental issue to be addressed in the EIR.
- I25-2 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Comment noted. Potential aesthetic impacts to Sunset Hills Country Club are addressed in Draft EIR Section 4.1, *Aesthetics*.

From:Melinda Carmichael [miladymo@gmail.com]Sent:Sunday, November 13, 2011 12:29 PMTo:Presidential Substation ProjectSubject:Presidential Substation project

Follow Up Flag: Flag Status: Follow up Flagged

Ms Mosley

I am a resident of Tierra Rejada Valley living on LaPeyre Rd. Our road is entered off Tierra Rejada, 3/4 mile east of the 23, going south. We are just west of Esperance.

This project with a new substation plus a multitude of poles in any location would just continue an invasion of the Greenbelt. I have lived here ten years and been a witness to numerous changes, many not good, aesthetic, nor environmentally friendly. But this could be the most obnoxious and insulting.

It is my profound opinion that SCE is disregarding our community's opinions and ethos in proposing to add to the construction with a substation and installation of an insufferable quantity of poles. We're we in the city central, there would be no consideration of anything above ground.

Additionally SCE history of maintenance on rural poles in high fire hazard areas should be considered catastrophic. What does the San Diego County experience have to show us?

If the system upgrades (System Alternative B) can accomplish the task without the assault and lace-4 hazard to the Greenbelt, then the CPUC should select that option.

If there are other contacts that should hear my opinion, I would appreciate knowing who and what agency so I can weigh in. How does one gain the information about proceedings beyond reading my local paper? If there are additional steps I might take please let me know.

I appreciate you hearing me and passing on my comments.

Melinda Carmichael 15664 LaPeyre Rd Moorpark CA 93021 805-368-8392

Sent from my iPad

1

3.3.26 Letter I26 – Melinda Carmichael

- I26-1 Regarding impacts to the Tierra Rejada Greenbelt, see Response A5-5.
- I26-2 The commenter expresses the opinion that SCE is disregarding community opinions and ethos, and expresses opposition to above-ground construction. The comments do not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Comments noted.
- 126-3 This comment is noted. As disclosed in the Draft EIR discussion for Impact 4.8-6 (see Draft EIR page 4.8-22), the implementation of Mitigation Measure 4.8-6 would reduce the potential for wildland fires associated with maintenance of the Proposed Project to less than significant. The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials*, for further discussion and analysis of fire hazards.
- The comment expresses supports for System Alternative B, provided it does not impact the Tierra Rejada Greenbelt. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on System Alternative B and Response A5-5 for a discussion on the Tierra Rejada Greenbelt.
- 126-5 This EIR will be used by the CPUC, in conjunction with other information developed in the CPUC's formal record, to act on SCE's application for a Permit To Construct for construction, operation and maintenance of the Proposed Project. See Draft EIR Section 1.3.1, CPUC Process, for a complete discussion of the CPUC Process.

Information on proceedings can be found on the CPUC website at the following address: **http://www.cpuc.ca.gov/PUC/proceedinginfo.htm**. In addition, to be added to a service list for the project, you can complete and submit the form on the following CPUC website http://www.cpuc.ca.gov/service_lists/ or you can contact the Process Office (415) 703-2021, or email: **process_office@cpuc.ca.gov**.



November 13, 2011

Dear Ms. Juralynne Mosley,

In reference to the DEIR, I am concerned that there is no mention about easements or land acquisition to make room for the new power poles. This will have a large impact on our property and our living 127-1 environment. If we lose trees, fencing, landscaping, septic and lighting who pays for the replacement, the rebuilding and redesign of the front of our property. I am concerned that the value of the property will be negatively impacted. In today's market that is not acceptable.

If the project is truly needed, then I would support either upgrading the existing substations or undergrounding the project along Read Rd. and Sunset Valley Rd.



As you can see from the picture there are many trees, oil pipe rail fencing with water for irragation running through the top rail. The septic field extends throughout the front yard and I do not know how 127-2 or where that could be relocated. This is not an area for a project that is above ground. The combined impact would be too great. As I stated before, I would be in favor of the System Alternative B (Upgrades to the three existing 127-3 substations). The DEIR is incomplete by not referencing this option which was confirmed as feasible. 127-4 The DEIR does completely address impacts to agricultural lands, air quality, water, septic systems, franchise rights, land condemnation, fire hazards and scenic views. An above ground project would be over extended areas of dried hillside that has not burned in years but 127-5 could wipe out the entire south side of Read Rd. if it ever did catch fire. Having a ranch with livestock this is very unnerving. The potential finacial impact of an above ground project could potentially reduce the value of my property by another 25%. The EIR needs to address these concerns. It is hard to get behind a project that has not demenstrated an actual need for its existence and will be paid for by my rate increases and tax dollars while further 127-6 reducing the value of my property while negativly impacting my living environment. Not to mention if I have to personally repair and or replace trees, landscaping, septic and oil pipe fencing. This is just to much impact to put on the back of the residences along the proposed route.

Thank you for your attention to these details. I know you are overwhelmed with many issues regarding this project. I truly believe that the upgrade existing substations or complete undergrounding is a win, win situation. Everyone that I have spoken with would support either of those alternatives.

Hoping common sence prevails,

Chris Hansing.

3.3.27 Letter I27 – Responses to Comments from Chris Hansing

- 127-1 Regarding impacts to property values, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2. As discussed in Response I5-5 above, additional overhang easements may be required. The overhang easements would accommodate pole cross-arms and wires, which would be located above the land only. Such an easement would not present a physical impediment to existing development. Draft EIR Section 2.6, *Rightsof-Way Requirements*, discusses existing and new easements required for construction of the Proposed Project.
- 127-2 The commenter expresses support for an alternative that would upgrade existing substations and/or undergrounding the subtransmission lines. See Master Response 1, *Alternatives* in Section 3.1.1, Master Response 3, *Undergrounding* in Section 3.1.3, and Response 127-1 above for concerns on easements. Response 15-6 provides information on encroachment issues and septic systems. See Response A14-30 for information of tree protective measures.
- I27-3 The commenter expresses support for System Alternative B. See Master Response 1, *Alternatives* in Section 3.1.1.
- 127-4 This comment states that the Draft EIR does completely address impacts to agricultural lands, air quality, water, septic systems, franchise rights, land condemnation, fire hazards and scenic views. Based on the other comments in the letter, it is assumed the commenter intended to say the Draft EIR does NOT completely address impacts to those resources. However, the commenter does not provide any specific concern or issue for which the Draft EIR is lacking, inaccurate, or inadequate. This comment is noted. The commenter is referred to Draft EIR Sections 4.1, *Aesthetics*; 4.3, *Air Quality*; 4.6, *Geology, Soils, Seismicity, and Mineral Resources*; 4.8, *Hazards and Hazardous Materials*; and 4.16, *Utilities and Service Systems* for relevant discussions in the Draft EIR. Regarding potential impacts to septic systems see also Response I5-6 above. The Draft EIR found that the Proposed Project would not result in impacts associated with septic systems (see Draft EIR Sections 4.6, *Geology, Soils, Seismicity, and Mineral Resources*).
- 127-5 Regarding impacts from wildfires, the commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials*. Regarding impacts to property values see Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- 127-6 The commenter is referred to Master Response 2, *Non-CEQA Issues* for a discussion on property values, and utility rates. See Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand. The commenter expresses concerns about having to personally repair structures and trees on private property. No physical improvements are proposed within the overhang easements and therefore such repairs would not be necessary; see Response I27-1.

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Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Commenter DUSANC Address: ۱٨ 0 Comment: ru 1 128-1 Dower. Ŵ 01 0

3.3.28 Letter I28 – Response to Comment from Michele Flocks

I28-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Regarding impacts to Underwood Family Farms, please see Draft EIR Section 4.1, *Aesthetics*, pages 4.1-26, 4.1-30, and 4.1-59. Regarding undergrounding of the subtransmission lines, see Master Response 3, *Undergrounding*.
TRIDENT RANCH GARY CRAMER & MARJORIE HERRING 3240 SUNSET VALLEY RD MOORPARK, CA 93021

November 14, 2011

Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowel Blvd. Suite 200 Petaluma, CA 95954

Email: presidentialsub@esassoc.com

ATTN: Presidential Substation Project

Dear Ms. Mosley:

I am writing this letter to you as part of the public input regarding the proposed Presidential Substation Project. I am against the proposed Presidential Sub Station project and would hope that you might expand your research on a no project option.

If the project must proceed, I support upgrades to the existing substations which I believe is the superior plan for both the environment and the communities that lie in the Tierra Rejada Valley.

My objections to any alternative that includes placing high voltage lines along Sunset Valley Road and Read Road are based on the both the environmental and aesthetic impact. There is no excuse for turning the beautiful green belt area of the Tierra Rejada Valley into a blighted area by putting in huge power poles with buzzing power lines. This area was specifically set apart as a green belt area by the communities of Thousand Oaks, Simi Valley and Moorpark to preserve the feeling of country and open space and to offer visual respite from city sprawls.

If the superior System Alternative B is infeasible for any reason, my second choice to support would be to underground all lines on Sunset Valley Rd and Read Rd.

Please listen to the public on this issue. Once done, it cannot be undone. I beg of you to consider more environmentally friendly and less invasive alternatives that will cost the ratepayer less in the long run.

Sincerely

Marjorie Herring

Marjorie Herring 805 523-3118

3.3.29 Letter I29 – Responses to Comments from Marjorie Herring

- I29-1 The commenter expresses support for upgrading existing substations, and is referred to Master Response 1, *Alternatives* in Section 3.1.1. The commenter also requests that the analysis of the No Project Alternative be expanded. The No Project Alternative was adequately described in Draft EIR Section 3.4.6 and analyzed in each resource section of the Draft EIR. See individual sections in Chapter 4 of the Draft EIR for an analysis of the No Project Alternative by resource area.
- I29-2 Regarding impacts to the Tierra Rejada Greenbelt, see the Response A5-5.
- 129-3 The commenter expresses support for System Alternative B and undergrounding the subtransmission lines. See Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 3, *Undergrounding*, in Section 3.1.3.

130-1

130-5

From:Gaston Monast [gaston@gerberhinge.com]Sent:Monday, November 14, 2011 4:07 PMTo:Presidential Substation ProjectSubject:Presidential Substation Project

Ms. Mosley,

I would like to express some concerns regarding the Presidential Substation project, from Southern California Edison, for Sunset Valley Road and Read Road.

The DEIR report that we received, does not consider the no building alternative. You have numerous existing sub-stations in our area that could be upgraded by S C E and postpone indefinitely the construction of the Presidential Substation. The following substations, Newbury Park, Oak Park and Santa Susana, can be upgraded by S C E very easily to make up the needs of S C E and they wouldn't have to build the Presidential Substation.

You have not considered the commercial site on the southwest corner of the 23 freeway and Tierra Rejada for a possible site for your substation. It is a commercial site. This site is screened by trees, border's the freeway, is above the flood plain, vacant and would be an ideal location if you insist on building another substation. It would have very minimal environmental impact.

The DEIR does not address the impact on the homes on Read Road. The project will be devastating on these homes and the environment. The building of huge caisson to hold these poles will take over the street and a great deal of peoples front property and destroy the beauty of the landscape and environment. It will require the destruction of trees and the natural beauty of this area. And the safety of the area during construction including the ingress and egress of the residents of Read Road who don't have an alternative egress and ingress at the moment. These issues have not been addressed and must be in order to have a true picture of this mess that will be created by this project.

I believe that the DEIR is not complete as it has not evaluated all the comments that were brought up regarding this project. I don't think that the "no project" issue has been addressed properly by the ESA and the CPUC. We feel that we are being railroaded by the CPUC which does not seems to have any concerns about the voice and the will of the people, environmental impact of the project and the no need of this project.

I truly hope you will take these comments under considerations and review this project and address all the issues that were brought up and not only the views of S C E.

Thank you for your consideration

Gaston A. Monast

3.3.30 Letter I30 – Responses to Comments from Gaston Monast

- I30-1 The commenter states that the Draft EIR did not consider a No Project Alternative. The No Project Alternative was described in Draft EIR Section 3.4.6, *No Project Alternative* and was adequately analyzed in each resource section of the Draft EIR. See individual sections in Chapter 4 of the Draft EIR for an analysis of the No Project Alternative by resource area. Regarding upgrading existing substations, see Master Response 1, *Alternatives*, in Section 3.1.1.
- 130-2 This comment recommends the consideration of an alternative substation site. Pursuant to CEQA Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project, an EIR must consider a range of alternatives which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. See Draft EIR Section 3.5 for a description of all alternatives considered but eliminated from full EIR evaluation. The suggested site would be relatively close to the site identified for Alternative Substation Site D which was eliminated from full evaluation (see Draft EIR Section 3.5.3). The feasibility issues, reliability issues and environmental impacts for the suggested site would be similar to those described for Alternative Substation Site D.
- I30-3 The commenter expresses concerns for the homes on Read Road but does not specify how the Draft EIR fails to capture impacts to these homes. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Regarding concerns about the beauty of the area, the commenter is referred to Draft EIR Section 4.1, *Aesthetics*. Regarding issues on the safety of Read Road, see Response 15-12 above.
- I30-4 The commenter is referred to Draft EIR pages 4.15-14 and 4.15-15 for the impact analysis associated with traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways in the project construction areas. Also, see Response I5-12 regarding traffic safety and access concerns on Read Road.
- I30-5 The commenter states that the Draft EIR did not adequately address the No Project Alternative. The No Project Alternative was described in Draft EIR Section 3.4.6, No Project Alternative and was adequately analyzed in each resource section of the Draft EIR. See individual sections in Chapter 4 of the Draft EIR for an analysis of the No Project Alternative by resource area.

November 10, 2011

Ms. Juralynne Mosley C/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954

Re: Draft EIR Presidential Substation Ventura County

Dear Ms. Mosley:

My wife and I are the owners of assessor's parcel 500-0-410-415 which is located on the north side of Read Road from 23 Freeway fence approximately 1600 feet west along the right of way. This parcel is part of our 120 acre farm which has been in our family since 1935.

We are very concerned that the draft EIR doesn't address the amount of our farmland that will be taken outside of the right of way in order to tunnel under route 23. There will be 131-1 considerable disruption of our farming the area during construction and potentially a permanent unplantable area for a vault and access to the cable. Dust control during construction should be imperative to avoid causing pest problems and contamination. Safety on Read Road is another one of our major concerns. This narrow country road is already substandard and the construction of this line makes the situation even more 131-2 hazardous. These lines will have a severe impact on the scenic view shed particularly in the valley along Sunset Valley Road. What a shame to view the sunsets through a phalanx of 65' 131-3 foot power poles and lines. It would truly be a blight on this county designated greenbelt and open space area. My wife and I support the Superior Environmental Alternative. There is inadequate data to support the need for this project as proposed. Upgrading the existing three substations 131-4 in the area would meet the demand especially since it has been stable in recent years. Growth in the affected cities service area is not projected to be significant.

Failing this alternative, we would prefer Alignment 4.

Sincerely yours,

Richard S. & Linnea E. Brecunier

Ruhel J. Jomm

3.3.31 Letter I31 – Responses to Comments from Richard and Linnea Brecunier

I31-1 The commenter expresses concern that the Draft EIR did not address that the commenter's farmland would be disrupted during construction. The commenter is referred to Draft EIR Section 4.2, *Agriculture and Forestry Resources*. Temporary disturbance to Farmland (which includes designated Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) is analyzed under Impact 4.2-1 (Draft EIR page 4.2-8), and permanent disturbance to Farmland is analyzed to Impact 4.2-2 (page 4.2-9). Both impacts were determined to be less than significant.

The comment that indicates that dust control during construction is imperative is noted. For a description of the extensive dust control measures that would be required to be implemented during construction activities, refer to Draft EIR Mitigation Measure 4.3-2 (page 4.3-14).

- I31-2 See Response I5-12 regarding traffic safety concerns on Read Road.
- I31-3 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. Aesthetic impacts to Sunset Valley Road are described in Draft EIR Section 4.1, Aesthetics, under Impact 4.1-8, under the subheading Proposed Subtransmission Alignment along Sunset Valley Road from Tierra Rejada Road to Read Road (page 4.1-57 et seq.). As described in the Draft EIR, "while impacts from replacement of existing poles would be adverse, impacts to motorists and local residents would be less than significant. The proposed subtransmission alignment would result in an incremental visual effect which would not substantially alter the intrinsic character or composition of the existing view." Impacts to views from Underwood Family Farms, which is located on Sunset Valley Road, are also evaluated under Impact 4.1-8, under the subheading Park and Recreation Areas (Draft EIR page 4.1-58 and 4.1-59). Given the visual sensitivity of Underwood Family Farms (moderate-to high), impacts to visual resource would be adverse and potentially significant. However, implementation of Mitigation Measure 4.1-8 would reduce impacts to less than significant.

Regarding impacts to the Tierra Rejada Greenbelt, see Response A5-5.

I31-4 The commenter expresses support for System Alternative B and undergrounding the subtransmission lines. See Master Response 1, *Alternatives* in Section 3.1.1 and Master Response 3, *Undergrounding* in Section 3.1.3.

Public Comment Card Presidential Substation Project Public Meeting for the Draft EIR Thursday, October 13, 2011 6:30pm-8:30pm Name: Michter 1040 Commenter Address: SIC. 1 HOUSAND Ø Comment: 1 2 132-1 le el m

3.3.32 Letter I32 – Responses to Comments from Michael Flocks

I32-1 The commenter expresses concerns about need for the Proposed Project and adverse affects to property values. See Master Response 1, *Alternatives*, in Section 3.1.1 for a discussion on electrical demand. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on project need, and impacts to property values.

From: Mercedes Todesco and Family P.O. Box 941912 Simi Valley, CA 93094 Family homeowners on Read Rd, known as the "Blue House"

November 15, 2011

VIA EMAIL: presidentialsub@esassoc.com

- To: Presidential Substation Project c/o Environmental Science Associates 225 Bush Street, Suite 1700 San Francisco, CA 94104-4207
- Re: DRAFT EIR Supplemental Comments re Presidential Substation Project

Thank you for allowing additional time to voice our concerns regarding the DRAFT EIR on the Presidential Substation Project. We wish to reiterate our support for the superior alternative System Alternative B. This letter supplements written and verbal comments previously submitted with the below additional concerns:

- The DEIR is missing specifics as to the physical locations of the poles and lines. It fails to identify with any detail the placement of the transmission poles and the overhang of the high-voltage lines onto our property. Therefore, the DEIR is incomplete and renders anything short of adopting System Alternative B as defective.
- Easement issues and property rights are not addressed. This is a serious issue as our family home is right at the roadway on Read Rd and would have numerous physical, health and safety risks as previously submitted. How are we afforded a fair opportunity to voice all legitimate concerns when detailed information of pole and line placement is missing? We question whether SCE is even entitled to encroach upon our property, and in fact we assert it has no such right.

133-1

3.3.33 Letter I33 – Responses to Comments from Mercedes Todesco and Family

I33-1 The commenter asserts that the Draft EIR is missing specifics regarding the physical locations of the poles and lines, and fails to identify with detail the placement of transmission poles and overhang of high voltage lines onto private property on Read Road.

The Draft EIR includes and analyzes all currently available information regarding proposed locations and heights of specific poles. Chapter 2, *Project Description*, Figures 2-9a though 2-9f portray the anticipated locations of the approximately 66 poles that would be required under the Proposed Project, including those along Read Road, as well as the anticipated heights of poles for which that information is known. As stated in the figure legends, "Poles for which specific heights are unavailable (N/A) will be within the height ranges indicated above [in the legend]." Figure 2-8 provides all details known at this time. Final specifications will be determined during final engineering.

I33-2 Regarding pole line placement, see Response I33-1. The commenter expresses the opinion that easement issues and property rights are not addressed in the Draft EIR. Draft EIR Section 2.6, *Rights-of-Way Requirements*, discusses existing and new easements required for construction of the Proposed Project. As stated in the top paragraph of page 2-29, "The proposed subtransmission alignments would be located within existing road ROW, currently being used for 16 kV distribution. However, some areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross-arms and wires, and may require additional rights depending on final engineering..." Proposed subtransmission lines located within existing ROW would not encroach upon private property. Also see Responses I5-5, I5-6, I22-2, and I22-4 above.

134-1

134-2

From:	Lily Wu [lilykwu@gmail.com]
Sent:	Wednesday, November 16, 2011 3:30 AM
To:	Presidential Substation Project
Subject:	1924 Maya Pradera Lane
Categories:	Green Category, Blue Category

Dear Ms. Juralynne Mosley,

Our family spent our life savings in 2008 and purchased the house at 1924 Maya Pradera Lane at Moorpark. We planned to add additional rooms to the house, so we could retire at the house together. The new poles SCE Presidential Project has proposed are right next to our house. If these new electric poles are built above ground, they are taller and are very close to our property, the new poles will

- 1. become life threatening during earthquake if the poles come down into our house and pool.
- 2. severely impact our property value.
- 3. make the house much more difficult to attract new buyers in the future.

One of the main reasons that SCE wants to built the new poles above ground is cost saving. I sincerely hope SCE will consider the loss of value this project will bring to my family. Our house was estimated above 2 million dollars before the project.

Sincerely, Lily Wu 1924 Maya Pradera Lane Moorpark, CA 93021 805 279-1515

3.3.34 Letter I34 – Responses to Comments from Lily Wu

- I34-1 As discussed in the Draft EIR discussions for Impacts 4.6-1 and 4.6-2 (see Draft EIR page 4.6-17 and 4.6-18), the potential for the proposed aboveground subtransmission lines and poles to collapse due to surface rupture or strong ground shaking during an earthquake would be low due to modern engineering of the proposed subtransmission line and poles. For additional information, see Draft EIR Section 4.6, *Geology, Soils, Seismicity, and Mineral Resources*, and Draft EIR Section 4.8, *Hazards and Hazardous Materials*.
- I34-2 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted and the commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.

From:	Danila Oder [doder@usc.edu]
Sent:	Wednesday, October 05, 2011 11:22 AM
To: Subject:	Presidential Substation Project Presidential Substation EIR Comments
Follow Up Flag:	Follow up

Follow Up Flag: Flag Status:

Categories:

Yellow Category

Flagged

I support the environmentally superior alternative, System Alternative B, which eliminates the significant environmental impacts of the Presidential Substation Project and costs ratepayers less. It meets the project objectives, costs less money, and avoids significant impacts to wildlife and local communities. Electricity data from the past several years demonstrate that these costly power lines and new substations are not needed.

Please adopt the environmentally superior alternative and reject the costly and expensive Presidential Substation Project.

Danila Oder 530 S. Kingsley Dr. #402 Los Angeles, CA 90020-3562 US

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3.3.35 Letter I35 – Response to Comment from Danila Oder

I35-1 The commenter expresses support for System Alternative B. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on electrical demand.

From:	sj rich [sjlbrich@yahoo.com]
Sent:	Saturday. October 22, 2011 10:58 AM
To:	Presidential Substation Project
Subject:	Public Comment on the Draft EIR
Follow Up Flag:	Follow up

Flagged

Follow Up Flag: Flag Status:

Categories: Yellow Category

October 22, 2011

To: Juralynne Mosley, Environmental Project Manager

From: Janet Richards

Re: Presidential Substation Project

Thank you for accepting my comments and taking time for our neighborhood concerns. I am a resident of the Tierra Rejada Valley greenbelt. Our location is referred to as a wild-life corridor. We live in a special area where the goal of the county and residents is to remain an open space (under the S.O.A.R. initiative) in order to protect and provide an area for the wild animals. With this distinction, comes a great deal of restrictions to all land owners. With our large parcels, it is also what makes our area an amazing place to live.

The original developers were instructed, per the Country, to put all utilities underground so the area would look to be an untouched open space, this was a costly project. Each parcel is allocated a percentage of covered areas this includes homes, buildings, barns. We cannot build whatever we desire, we follow the rules of the open space laws. We do not have power lines in our neighbor at this time and the space should be preserved as intended. Not only is this area protected, the geology is made up of solid rock making every construction project very expensive and difficult.

Although our land looks like a perfect area to run power lines through, we residents also have concerns. The neighborhood is full of families with children, the Ronald Reagan Presidential Library has thousands of visitors, and again the wild-life has been protected by the government. Three years ago during construction, the county discovered a rare snail shell on the very lot the poles would run through. This discovery by county officials made it impossible for this particular resident to sub divide their property. This doesn't seem just when Edison feels they can now purpose such a project and residents remain so restricted.

Like many homeowners, our residents have invested everything they have into living in such a wonderful place. With the decrease in home and land values as it is now, this would only cause increased loss in value to any neighborhood. Living in an open space area such as ours, we have the constant fear of wild fires. The power poles serve as a real threat of fire. No one wants to lose their home to a fire. The power lines would be directly under the Presidential Library that is home to authentic historical items. The boarding ranches located below would have significant loss in revenue, customers will not put their animals or themselves in

36-1

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Comment Letter I36

136-1

danger during construction. This project would not serve our area and should be considered elsewhere or not at all.

The facts and studies I've been made aware of do not seem to equate the costly project and end result. My hope this that Edison rethinks the entire project and when truly needed, add the power source in underground or create super substations where they currently exist. I realize the areas where Edison would like to run the lines follows existing lines, making the job that much more achievable. I believe all residents attending these meetings agree, Edison needs to step back and think of new ways of technology and better use our resources before adding bigger power poles to these communities.

My wish is that no resident listed in the purposed project is affected and the lines run underground.

Sincerely,

Janet Richards 1560 Theising Circle Moorpark, CA 93021 (805) 520-4706 <u>silbrich@yahoo.com</u>

3.3.36 Letter I36 – Response to Comment from Janet Richards

I36-1 The commenter describes the project area and expresses concerns about property values, wildfires, and project need. For a discussion on property values, see Master Response 2, *Non-CEQA Issues*. The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials*, Response I21-4, and Response I26-3, for a discussion and analysis of fire hazards. The commenter also expresses support for undergrounding and System Alternative B. See Master Response 3, *Undergrounding* in Section 3.1.3 and Master Response 1, *Alternatives* in Section 3.1.1.

From:	Craig Underwood [craig@underwoodranches.com]
Sent:	Monday, October 24, 2011 5:54 PM
To:	Presidential Substation Project
Follow Up Flag:	Follow up
Flag Status:	Completed
Categories:	Yellow Category, Green Category

Dear Ms. Moseley

I am writing to comment further on the draft EIR for the Presidential Substation Project. I own a farm in the Tierra 37-1 Rejada Valley that is fronted by Read Rd. and Sunset Valley, along which the 66KV towers and power lines are planned. They will be unsightly and above ground power lines are inherently dangerous. Downed power lines are forever causing 137-2 power outages, fires, and accidents. The path of the lines along Read Rd. will be devastating to the residents, causing property values to drop and placing power lines in their front yards. The construction phase will be extremely disruptive to traffic. This time of year we have thousands visit the farm to pick pumpkins and enjoy the farm experience. Each 137-3 Spring and Fall 40,000 school children visit the farm to learn about fruits and vegetables and we hope learn to adopt a healthy diet. The valley is a special place that does not need the huge negative impact of the towers and lines. Edison 137-4 has used some wildly optimistic projections for increasing demand to justify the project. This unnecessary project then becomes the equivalent of a tax increase on rate payers to amortize the cost and yield a return on investment to SCE. The impact on the environment of the valley is far more significant than indicated. It certainly forms a barrier along Sunset Valley Rd. At this time, there is no way of knowing how the properties that abut Sunset Valley Rd. to the East and 37-5 West may interconnect in the future to enhance the Valley. The intrusion of the power lines will certainly have a major effect on that. The environmental impact is not justified by need. I fear for the effects on the environment of the Valley and on our farm.

Sincerely, Craig Underwood 1010 Rosada Crt. Camarillo, Calif. 93010

3.3.37 Letter I37 – Responses to Comments from Craig Underwood

- 137-1 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted. In regard to general comments regarding appearance and dangers of power lines, the commenter is referred to Draft EIR Section 4.1, *Aesthetics*, and Section 4.8, *Hazards and Hazardous Materials*.
- I37-2 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted and the commenter is referred to Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on property values.
- I37-3 The commenter expresses concerns about impacts to traffic from construction in the vicinity of Underwood Family Farms, which is located on Sunset Valley Road. The Draft EIR described the roads in the vicinity of Underwood Family Farms (including Sunset Valley Road, Read Road, Tierra Rejada Road, and Moorpark Road), and the potential impacts of Project construction on access to those roads. The width of Sunset Valley Road and its connection with Tierra Rejada Road and Read Road is described in Draft EIR Section 4.15, Transportation and Traffic, page 4.15-3. The following potential impacts that are relevant to Underwood Family Farms are described on Draft EIR pages 4.15-11 and 4.15-15: (a) temporary disruption of traffic flows and potential blockage of access to properties along Sunset Valley Road (including the Underwood Family Farms) and Read Road during temporary lane and road closures; and (b) temporary increased potential traffic safety hazards for vehicles, bicyclists, or pedestrians on local and County roadways related to the addition of construction vehicles and equipment movement when access by non-construction personnel is permitted. The Traffic Management Plan (TMP), prepared per Draft EIR Mitigation Measure 4.15-1b and subject to approval of the appropriate state agency and/or local government(s), would reduce impacts to less-than-significant levels.
- I37-4 See Master Response 2, Non-CEQA Issues in Section 3.1.2 for a discussion on Project need, and utility fees and Master Response 1, Alternatives in Section 3.1.1 for a discussion on electrical demand.
- 137-5 The comment expresses the opinion that the Proposed Project would form a barrier along Sunset Valley Road. The potential for the Proposed Project to divide an established community is analyzed in Draft EIR Section 4.10, *Land Use and Planning*, under significance criteria a). As discussed on Draft EIR pages 4.10-3, the proposed subtransmission alignment would not physically divide an established community. If the commenter is instead referring to a visual barrier, see Draft EIR Section 4.1, *Aesthetics*, which pertains to visual impacts from Proposed Project construction, operations and maintenance. Impacts to views from Sunset Valley Road were found to be less than significant with mitigation.

DEIR Comments – Incomplete or Missing Alternatives

The Draft Environmental Impact Report, DEIR, is to thoroughly discuss the Proposed Project and the Alternatives that may or may not be Environmentally Superior. The DEIR as issued provides an excellent Alternative, the Environmentally Superior Alternative, which calls for the upgrading of the Three Substations within the narrowly defined Electrical Needs Area with larger Transformers, than the current 28MVA units. While we are very supportive of this Alternative we are concerned that many other Alternatives that have little or no Environmental Impact were not fully considered in the DEIR.

Consumer Driven Alternative

The lack of full consideration for Distributed Generation Alternative via Solar, the Energy Efficiency Alternative and the Demand Management Alternative, "Consumer Driven Alternatives" were dismissed as voluntary. The rationale for dismissing these consumer driven Alternatives is that they rely on future actions however the past steps taken by consumers, governments and businesses since 2008 are known and cannot be dismissed as future actions. Therefore the actions taken under Distributed Energy, Energy Efficiency and Demand Management since the issuance of the PEA in 2008 constitute an implemented Consumer Driven Alternatives that should be evaluated separately and in conjunction with other Alternatives to meet the project objectives.

SCE maintains and can provide the reduction in demand or the off-loading of demand on Distributed Energy and Demand Management through the various programs that it manages for incentives and rebates. The impact for Energy Efficiency Alternative is more difficult since it is the result of all actions taken including but not limited to upgrades to buildings, replacement of appliances and use of FT light bulbs. Given the variety and individual choices that are made by consumers, governments and businesses the only method by which to measure the total effect of these Consumer Driven Alternatives is to monitor the reduction in peak demand within the Electrical Needs Area, ENA. This method also provides for the true impact versus the theoretical impact from nameplate ratings.

The impact of the combined Consumer Driven Alternatives is estimated to be 40 MVA since 2008 based on the drop in demand as of 2011, after adjustment for the 'departed load" of 3%, or 10 MVA, provided by SCE in GRC2012 Load Planning testimony. The past actions taken by consumers, businesses and government totaling the 40MVA should be considered the amount of Consumer Implemented Alternatives that has gone into effect since the PEA was issued in 2008. This Alternative should be combined with other Alternatives such as System Alternative A, System Alternative B and other Alternatives that do not require a substation to meet the project objectives.

138-1

Load Shifting or Load Balancing Alternative

The DEIR should also have considered the Alternative of load balancing or load shifting to neighboring substations such as Oak Park and Newbury, which operate within the network of Moorpark Substation. These two substations have or will receive significant upgrades since the issuance of the PEA in 2008. This "change in circumstance" requires that the PEA be re-issued or that a similar Alternative be developed that takes into account the projects at the Oak park and Newbury substations. SCE has maintained that load balancing between these substations has been used in the past, (see SCE response to Protests to the PEA) and load balancing is called for in SCE's Load Planning process, (see GRC2012 testimony). There is no discussion of the option, feasibility or availability to load balancing with the neighboring Substations as called for in SCE's Load Growth planning process. The fact that the three substations within the narrowly defined Electrical Needs Area are already connected with Oak Park and Newbury and are in close proximity to Thousand Oaks and Potreo Substations, makes this Alternative very feasible.

This Alternative would be called for under the CEQA GHG provision since it would eliminate the need to build a substation and the associated GHG emissions for that project.

In addition, this Alternative, when fully discussed, would offer the lead agency, the CPUC, the option to evaluate a second Alternative with no or limited Environmental Impact as is found in the Environmentally Superior Alternative.

Distributed Generation-Commercial Solar Rooftops

The DEIR does not fully evaluate the use of Distributed Energy, namely solar PV, as an Alternative even though it would result in little if no environmental impact and be Environmentally Superior to the Proposed Project. The rationale for this Alternative is overwhelming:

1. The Thousand Oaks Substation that is at capacity is surrounded by several large shopping malls, commercial buildings and large 'big box" stores that have available rooftops.

2. SCE Distributed Energy Interconnect map shows over 30 MW of interconnect available within close proximity to the narrowly defined electrical needs area.

3. The majority of Solar PV installations on the commercial rooftops would be used onsite and not require distribution to the end user of the electricity generated

4. The solar index of Simi Valley and Thousand Oaks equals or exceeds that of Riverside and San Bernardino Counties where SCE has focused its Commercial Rooftop program.

138-1

DEIR Comments – Incomplete or Missing Alternatives

5. The Cities, Businesses and Residents of Thousand Oaks and Simi Valley have been identified as leading proponents and implementers of Solar PV in the State of California.
6. There is over 50 MW of Solar PV projects within the Cities of Thousand Oaks and Simi Valley that were registered with the California Solar Initiative and later dropped. The primary reason is the difficult economic circumstances that impacted the self-funding necessary for the projects.

7. SCE has CPUC approval to implement 500 MW of Solar of which 90% is for the Commercial Rooftop Program. The implementation of the program has been slower than expected due to the restrictive requirements on roof size, building age and other criteria. The cost of solar PV panels has declined substantially since the program was approved by the CPUC and more acreage can be built out for the same cost. Therefore, SCE has the funds already allocated to build out the rooftop solar within the Electrical Needs Area. If SCE provided the Solar PV under a Power Purchased Agreement to each roof owner or similar type of arrangement, the economic boundaries to the rooftop owner would be minimized. If it offered the incentive to rent the roof as it does under the Rooftop program there would be significant interest in with Building Owners.

8. There are several examples of successful implementations already in the Electrical Needs Area such as Macy's stores, Hilltop Canyon Treatment Plant and other Governmental Buildings.

9. The cost of Solar PV panels has dropped substantially and the cost of funds has also dropped making it possible to reduce the lifetime costs of Solar PV programs. The current cost of the Proposed Presidential Substation is roughly \$50 million and would provide for the implementation of 20 MW, a significant portion would be in the Thousand Oaks Substation area. This would have the impact of directly off-loading demand directly to the commercial centers that are connected to the Thousand Oaks substation.

10. SCE has a pending settlement on the GRC 2012 with Votesolar that requires SCE to perform an RFP for a Solar PV project as an alternative to a substation project. Given the interconnect availability, the large number of commercial sites, the proven success of past solar projects, the support of the community, the level of submitted solar projects and the limited number of Environmentally Superior Alternatives the Presidential Substation would appear to be a logic place for the RFP.

Therefore we ask that the DEIR perform a full evaluation of Distributed Generation Alternative based on commercial rooftop solar, funded by SCE's current rooftop program. This process can be done under the RFP process as defined in the pending settlement in the GRC 2012 between SCE and VoteSolar.

A workplan for the development of the RFP, selection of the sites and implementation of the various projects is available and will be provided to the CPUC or its consultants upon request.

I38-1

3.3.38 Letter I38 – Response to Comment from Chuck Cronin

I38-1 The commenter expresses support for System Alternative B and concerns that some alternatives were eliminated from full evaluation in the EIR. See Response I22-11 for a discussion on why Distributed Generation was eliminated from full evaluation in the Draft EIR. The commenter is also referred to Draft EIR Section 3.5.8, *Demand Management Conservation* and 3.5.9, *Renewable or Conventional/ Distributed Generation Energy Resources* for a discussion as to why the demand management, renewable energy, and distributed generation alternatives were rejected from full consideration in the Draft EIR. The commenter is referred to Master Response 1, *Alternatives* for a discussion on various alternatives including solar energy.



3.3.39 Letter I39 – Responses to Form Letter

- I39-1 The commenters express support for System Alternative B, and are referred to Master Response 1, *Alternatives* in Section 3.1.1.
- 139-2 Regarding impacts to wildlife, including critical habitat for endangered species, see Draft EIR Section 4.4, *Biological Resources*. Regarding the Draft EIR's analysis of impacts to the Tierra Rejada Greenbelt, see Response A5-5. Regarding consideration of alternatives pertaining to renewable energy, energy efficiency, and other forms of alternative energy, see Master Response 1, *Alternatives*, in Section 3.1.1.
- I39-3 For potential Proposed Project impacts to wildlife linkages (i.e., corridors) see Response A6-3. Potential impacts to designated critical habitat for coastal California gnatcatcher, Riverside fairy shrimp, and Lyon's pentachaeta are discussed in the Draft EIR in Section 4.4, *Biological Resources*.
- I39-4 Regarding System Alternative B and electrical demand in the project area, see Master Response 1, *Alternatives*, Section 3.1.1. Regarding project need, see Master Response 2, *Non-CEQA Issues*, Section 3.1.2.

3.3 Individuals Responses

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3.4 Southern California Edison Responses

This section includes the comments received from the Applicant (SCE), with individual comments delineated and followed by responses to each comment. Comments were also provided by SCE in a table, which appears after the responses to the letter.

3.4.1 Summary of SCE Comments on Draft EIR

On November 15, 2011 SCE submitted comments on the Draft EIR to the CPUC. The comments were contained in a letter with several attachments and a table. The SCE letter contained comments that applied to the entire document, with a focus on requested minor changes to the project description and alternatives. The attachments included technical documents (arborist report, botanical surveys), revised air quality and greenhouse gas calculations, and revised Figure 2-10, illustrating a new access road. The table provided specific text edits. Each component is summarized below:

SCE Letter

The SCE letter consists of 16 pages of written comments that were delineated into 29 individual comments. Overall, the letter requested that recommended changes be incorporated in a Final EIR. The letter expressed concerns that analyses contained in project alternatives omitted information that demonstrated the full impacts and failed to identify that they would not meet the Project Objectives in the same manner as the Proposed Project. The letter specified that System Alternative B would not achieve Project Objectives that are critical to the Proposed Project and that it would not fit into existing SCE operating procedures. As a result of concerns expressed in this letter and through additional technical information requests (see Appendix H) and conversations with SCE, System Alternative B was eliminated from consideration in the Draft EIR. See Master Response 1, Alternatives in Section 3.1.1 for details. In addition, the letter expressed the opinion that the Proposed Project is the Environmentally Superior Alternative. The CPUC has incorporated selected recommended changes contained in the documentation submitted by SCE as appropriate and revised the Draft EIR's description of the Proposed Project and analyses of alternatives, but concluded that the Proposed Project would not be environmentally superior to the other feasible alternatives. As a result, and in light of System Alternative B being removed from the Draft EIR, the Environmentally Superior Alternative has now been determined to be the combination of Alternative Substation Site B and Alternative Subtransmission Alignment 3. See Master Response 1, Alternatives in Section 3.1.1 for additional details.

SCE Attachments

As discussed above, attachments to the SCE letter included an arborist report, revised air quality and greenhouse gas (GHG) emissions calculations, focused botanical surveys, and a revised access road figure. These attachments were reviewed and the additional information was considered and incorporated as changes to the Draft EIR as appropriate. These attachments are included in the copy of SCE's comment letter in this section, and are summarized below:

Arborist Report: The arborist report provides an inventory of trees along the proposed alignment. The results of this report were incorporated in Section 4.4, *Biological Resources*. See Response SCE-30, and Response A14-30.

Air Quality and GHG Emissions Calculations: The revised air quality and GHG emissions calculations were updated based on minor changes to the project description provided in Table 2-7, which is included in SCE's comments. The revised emissions were used to update the analyses in Section 4.3, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*. See Response SCE-31 for the associated revisions to the Draft EIR.

2011 Special-Status Plant Surveys: Special status plant surveys were conducted on April 27, May 6, and June 16, 2011, by BonTerra Consulting. The results of this report were incorporated in Section 4.4, *Biological Resources*.

Revised Figure 2-10: The final attachment was a revised version of Figure 2-10, Access Roads. This revised figure can be found in Chapter 4 of the Final EIR, and has been incorporated into the Project Description (see Response SCE-33). This figure added a new section of access road, north of TSPs 5, 6, and 7 and relocated a section of an access road through the adjacent avocado orchard (two sections of access roads through the orchard).

SCE Table

The SCE comment table provided specific, line by line suggested corrections to the Draft EIR text. Comments ranged from grammatical suggestions and technical corrections to clarifications and the provision of additional data. The SCE Comment Table can be found in Section 3.4.3 below, along with responses from the CPUC to each comment. Where changes were not incorporated, an explanation is provided.

Comment Letter SCE



November 15, 2011

Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954 Attn: Presidential Substation Project Email: presidentialsub@esassoc.com

> Re: SCE's Comments on the Draft Environmental Impact Report (SCH #2009021059) for the Presidential Substation Project (A.08-12-023)

Dear Ms. Mosley:

Enclosed please find SCE's comments to the above-referenced Draft Environmental Impact Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on September 16, 2011. In addition to the enclosed comment letter and accompanying comment table, please also note that SCE is providing the following updated information.

- Revised Figure 2-10, Access Road
- Updated Air Quality Emissions Calculations
- Results of the Focused Plant Surveys for the Presidential Substation Project, Ventura County, California, dated August 31, 2011
- Certified Arborist Assessment in Support of the Presidential Substation DSP Project in Thousand Oaks, Ventura County, CA, dated November 4, 2011

Thank you for the opportunity to comment on the DEIR.

Sinc

Christine McLeod SCE Regulatory Affairs

Enclosures



Tammy Jones@sce.com

November 15, 2011

Ms. Juralynne Mosley c/o Environmental Science Associates 1425 N. McDowell Blvd., Suite 200 Petaluma, California 95954 Attn: Presidential Substation Project Email: <u>presidentialsub@esassoc.com</u>

Re: SCE's Comments on the Draft Environmental Impact Report (SCH #2009021059) for the Presidential Substation Project (A.08-12-023)

Dear Ms. Mosley:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on September 16, 2011. On behalf of Southern California Edison (SCE), the proponent of the Presidential Substation project (Proposed Project) that is the subject of the DEIR, this comment letter and the enclosed table address issues that apply to the entire DEIR, with a primary focus on project objectives and alternatives. In light of the information provided in this letter, SCE requests that the CPUC prepare a Final EIR that contains appropriate revisions to the analysis of alternatives and concludes that no alternative could achieve the objectives for this project in a more environmentally superior manner than the Proposed Project.

I. Overview Of SCE's Comments On The DEIR

In particular, this letter explains how the DEIR omits critical information demonstrating that: 1) alternatives described in the DEIR as superior to the Proposed Project would fail to achieve fundamental project objectives to the same degree as the Proposed Project; and 2) those alternatives likely would not be environmentally superior to the Proposed Project.

First, the DEIR's analysis of alternatives incorrectly concludes that a system alternative, a site alternative and a subtransmission alignment alternative would all achieve the project objectives. The DEIR's conclusions in this regard are incorrect. Most notably, System Alternative B would hinder achievement of objectives that are critically important to the Proposed Project, including issues that would affect system reliability and operational flexibility in the Electrical Needs Area (ENA). System Alternative B also does not account for the broader operation of SCE's standardized system, pursuant to which SCE strives to maintain a consistent set of preferred substation, transmission and distribution components so that the entire system can work in tandem.

P.O. Box 800

) 2244 W

2244 Walnut Grove Ave.

Rosemead, California 91770

(626) 302-6634

SCE-1

Fax (626) 302-1926

Comment Letter SCE

Ms. Juralynne Mosley Page 2 November 15, 2011

Next, as described more fully in the comments matrix submitted concurrently with this letter, the DEIR's comparison of the Proposed Project's potential environmental impacts and the alternatives' environmental impacts is similarly flawed. On the one hand, because the DEIR fails to account for a number of development components associated with several of the alternatives described in the DEIR, it *understates* the impacts likely to be caused by those alternatives.¹ On the other hand, the DEIR *overstates* the environmental impacts associated with the Proposed Project in several areas, including aesthetics, air quality and noise – all of which are areas where the Proposed Project was deemed to have significant impacts. As a result of these inaccurate analyses, the DEIR concludes that System Alternative B, Site B and Alignment 3 all would result in fewer environmental impacts than the Proposed Project. If the errors identified in the matrix and in this letter are corrected, a more accurate analysis would demonstrate that none of these alternatives would be environmentally superior to the Proposed Project.

For these reasons, the Final EIR should find that the Proposed Project: 1) would achieve the project objectives to a greater extent than the alternatives; and 2) would do so in a manner that is no less environmentally superior than any of the other alternatives studied in the DEIR.

II. Legal Standards Governing The Analysis Of Alternatives In A DEIR

As noted in the DEIR, the California Environmental Quality Act (Pub. Resources Code § 21000 *et seq.*, CEQA) and its implementing Guidelines (14 CCR § 15000 *et seq.*) require that an EIR describe "a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." (14 CCR § 15126.6(a); DEIR, at p. 3-2.)

CEQA does not establish a stringent limitation on the factors which a lead agency may consider when determining whether an alternative is feasible. Rather, CEQA provides that such a decision may rest on "economic, legal, social, technological, or other considerations." (Pub. Resources Code § 21081(a)(3).) Similarly, the CEQA Guidelines define "feasible" as: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (Pub. Resources Code § 21061.1; 14 CCR § 15364.)

SCE-4

P.O. Box 800 2244 Walnut Grove Ave. Rosemead, California 91770 (626) 302-6634 Fax (626) 302-1926

LAW #1840213

SCE1-5

¹ This is the case for each of the alternatives described as environmentally superior to the Proposed Project, namely System Alternative B; Alternative Substation Site B (Site B), which provides for construction of a substation at a different location than the Proposed Project; and Alternative Subtransmission Alignment 3 (Alignment 3), which provides for undergrounding of subtransmission facilities.

III. The DEIR Overstates The Ability Of System Alternative B To Meet Key Project Objectives.

Both the Proponent's Environmental Assessment (PEA) submitted by SCE with its Application for a Permit to Construct (PTC) for the Proposed Project and the DEIR set forth basic project objectives. (See DEIR, at p. 3-3.) In addition to simply meeting demand, those objectives specifically identify operational flexibility and reliability, and include:

- Meeting long term electrical demand requirements in the ENA as defined in SCE's Application and PEA; and
- Improving electrical system operational flexibility and reliability by providing the ability to transfer load between 16 kV distribution circuits and 16 kV distribution substations within the ENA.

The DEIR incorrectly concludes that System Alternative B would meet most of the project objectives, and only acknowledges in passing that "operational flexibility and reliability would be less than under the Proposed Project." (DEIR, p. 3-25.) Yet this conclusion woefully understates the fact that the objectives of operational flexibility and reliability are fundamental to this project, and as discussed more fully below, System Alternative B could actually hamper achievement of those objectives, not simply attain them to a lesser degree than the Proposed Project. Given the information SCE provides in this letter, the DEIR should be revised to provide a more accurate discussion of System Alternative B's ability to meet most of the Project Objectives, including the key objectives of operational flexibility and reliability. Based on that revised analysis, the Final EIR should conclude that System Alternative B could not meet those objectives.

IV. The DEIR's Identification Of System Alternative B As The Environmentally Superior Alternative Is Flawed.

The DEIR identifies System Alternative B as the Environmentally Superior Project and proposes that it be constructed instead of the Proposed Project. System Alternative B is described in the DEIR as follows:

"This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones.

The larger transformers would not be consistent with a standard SCE transformer sizing. Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required or upgrades to the existing 16 kV

distribution getaway equipment could be needed at some locations.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty."

(DEIR, at pp. 3-24 – 3-25.)

Given that SCE has only had since September 16, 2011 to evaluate the technical merits, feasibility, environmental issues and operability of System Alternative B, SCE provides the following comments based on the limited conceptual evaluation SCE has been able to perform to date.

A. The DEIR's Description Of System Alternative B Is Inadequate And Fails To Identify Several Fundamental And Necessary Components.

Even in the short period of time since the DEIR was published, SCE has already discovered a number of deficiencies in the DEIR's description of System Alternative B. First and foremost, if taken literally, System Alternative B could not feasibly be constructed. Taken at face value, System Alternative B implies that there would be an increase in transformation capacity if 30 megavolt ampere (MVA) transformers (with an assumed "top nameplate" rating of 56 MVA) are installed in place of the existing 15 MVA transformers (with a "nameplate" rating of 28 MVA) at each of the three existing substations identified in the description (*i.e.*, Royal, Thousand Oaks and Potrero). Consistent with SCE's standard system engineering reliability standards, SCE's transformation equipment at these substations consists of two sets of transformer banks (for this purpose, a "bank" consists of two back-to-back 15 MVA transformers). Under this system, each bank has a base rating of 30 MVA, a top rating of 56 MVA, and a Planned Loading Limit of 72.8 MVA. In addition, each transformer bank can be loaded to 81.2 MVA under emergency (N-1) conditions.²

System Alternative B provides that SCE would replace the existing 15 MVA units with new units rated at 30 MVA each. Given the space limitations at the three substations, there simply is not enough physical space at any of them to substitute one larger 30 MVA energized transformer for *each* of the four 15 MVA base energized transformers, particularly in bank configurations. Other

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² SCE's distribution system has evolved into its current state over the last 60+ years. SCE's distribution system design requirements, reliability requirements, operating practices, and equipment specification requirements have been optimized over this time period to provide a safe, reliable, efficient, flexible and cost effective "system" to serve SCE customer loads. SCE's system design reflects the best practices of other utilities in the United States along with SCE's own industry leading practices. This evolution has resulted in what is now considered to be SCE's standard transformer capacity and design, which includes the transformer specifications identified above.

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conceptual problems associated with simply replacing transformers in the existing "back-to-back" configuration include the fact that the 16 kV short circuit duty (SCD) would substantially increase, and the fact that there are no 16 kV bank breakers rated high enough to accommodate this atypical design. Accordingly, System Alternative B cannot be constructed as described in the DEIR and would therefore be infeasible. (Pub. Resources Code § 21061.1; 14 CCR §§ 15126.6(f)(1), 15364.)

Yet in the interest of evaluating a concept that might be consistent with the intent behind System Alternative B, SCE has further explored conceptual possibilities involving the replacement of transformers at Potrero, Thousand Oaks and Royal substations.

Transformer Specifications

Because the DEIR provides no information as to what the top transformer rating, planned loading limit, or N-1 loading limit of these larger transformers would be, SCE based its analysis on certain engineering and technical assumptions. In particular, with respect to transformers, SCE assumed that it would remove the two sets of "back-to-back" transformer banks (each composed of two 15 MVA transformer units for a total "top nameplate" rating of 56 MVA) at each substation, and in the place of these *four* transformers, SCE would install *three* single, stand-alone 30 MVA transformers (with a "top nameplate" rating of 56 MVA each). With this swap, transformer capacity at each substation would be increased from 112 MVA ("top nameplate") to 168 MVA ("top nameplate"). Although efficiencies associated with bank configurations would not be achieved, this generalized approach could provide a 56 MVA increase in transformer nameplate capacity at each substation.

However, as discussed further below, a substantial amount of additional work not accounted for in the DEIR (including installation of a large amount of new infrastructure inside and outside these substations) would be required, at a minimum, to complete this design.

The DEIR does acknowledge that in addition to new transformers, System Alternative B "could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint." (DEIR, p. 3-25.) Yet this general statement does not come close to adequately describing either the distribution equipment that must be replaced or a number of other required components both inside and outside of the three substations. A complete scope of work for this alternative is not known by SCE. However, a more likely description of the additional components that would be needed (at a minimum) to build this alternative is included below. Following that discussion is an analysis of the corresponding environmental impacts associated with those additional components. (*See* Section III.C.)

Modifications At Potrero, Thousand Oaks and Royal Substations

The DEIR does not sufficiently identify a number of additional modifications that would have to be made at each substation to accommodate the new transformers. Although SCE has not had sufficient time to engineer the design of these substations, based on an initial review of System //

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Alternative B, each substation would need to be substantially reconfigured, rebuilt and expanded in SCE-10 order to make room for this new equipment.

First, the 30 MVA transformers proposed as part of System Alternative B would have a larger footprint, would be taller and would weigh significantly more than the existing 15 MVA Accordingly, these transformers' larger physical transformers they would be replacing. characteristics would require new civil/structural elements, particularly because existing foundations would not be able to support the new larger equipment. At a minimum, new foundations would have to be installed for each new transformer, and a substantial amount of additional fill may have to be imported and added to the surface at Thousand Oaks Substation due to existing topography.

In addition, because the new transformers would require additional equipment and connections that would take up considerable space within each substation, the existing layouts would have to be expanded and redesigned, with the result that environmental impacts would almost SCE-11 certainly increase. For example, the existing 66 kV bus configuration at each substation must be changed from an Operating and Transfer Bus configuration to a different bus configuration that would allow SCE to take an operating bus out of service and still be able to serve load. (A doublebus-double-breaker configuration would likely be required, and this configuration would require the installation of additional equipment taking up additional space. Similarly, the existing 16 kV capacitor banks would have to be relocated and additional 16 kV capacitor banks to serve the new third transformer bank would be required, as would up to nine new distribution circuits. These additions were not anticipated when Potrero, Thousand Oaks and Royal substations were constructed, and space at those substations is limited. In fact, to accommodate this new and reconfigured infrastructure, SCE anticipates that expansion of these substations may be necessary, such that the actual substation footprints may extend all the way to property boundaries where walls, landscaping and setbacks are in place today. Since SCE has not engineered this alternative, it is not known if additional property would be required as well.

Modifications Outside The Substations

In addition to the facilities upgrades needed within the existing Potrero, Thousand Oaks and Royal substations, substantial additional upgrades not described in the DEIR would also need to be installed outside of these substations. Although the DEIR only acknowledges the potential for additional "distribution equipment" outside these substations, a significant amount of subtransmission infrastructure would also be required.3 For example, at a minimum, subtransmission line conductor work would be necessary in that System Alternative B would require SCE to install upgraded conductor on more than 3.5 miles of the existing Moorpark-Royal No. 2 66

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³ The distribution work associated with System Alternative B could be substantial. For example, additional distribution work could involve construction of potentially lengthy circuit ties to connect circuits emanating from Thousand Oaks Substation to circuits emanating from Royal Substation.

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kV Subtransmission Line. Installation of this upgraded conductor could require many structures and existing wood poles to be replaced with larger ones if they fail windloading tests when the new conductor is added.⁴

Additionally, 14.4 megavolt ampere reactive (MVAR) of new 66 kV reactive support (capacitor) would likely have to be installed at Malibu Substation, which is located in the City of Agoura Hills, several miles away from any of the three substations where new transformers would be installed under System Alternative B. None of this additional subtransmission work was disclosed in the DEIR's description of System Alternative B.

There is also the potential that additional telecommunications support would be required for this alternative. For example, a new ten mile telecommunication line could be required from Moorpark Substation to Royal Substation. Descriptions of these additional components were not provided in the DEIR.

B. System Alternative B Would Not Achieve The Objectives Of Providing Greater Reliability And Affording Operational Flexibility To The Same Extent As The Proposed Project.

As stated above, SCE has not had sufficient time to engineer the design of this alternative and therefore cannot conclude whether or not it is feasible. Yet even if this alternative design could be accomplished, SCE has serious concerns regarding the likelihood that it could provide the same reliability and operational flexibility as the Proposed Project, particularly because SCE does not typically plan for the type of non-standard transformers contemplated in System Alternative B. In fact, SCE has identified reliability, flexibility and demand-based concerns that would apply both during installation of the new equipment, and after it has been put into use.

At the outset, it will take considerable time to engineer, procure, and construct the components of System Alternative B, which could leave demand, reliability and flexibility concerns unaddressed for a longer period of time than with the Proposed Project. For example, the larger 30 MVA transformers contemplated for System Alternative B would be atypical and not consistent with SCE standardized system equipment. As discussed above, SCE typically installs 15 MVA base transformers at distribution substations such as these, and this practice is the result of decades of experience and takes into account operability, reliability, SCD and maintenance considerations. SCE does not typically design or procure the proposed non-standard transformers. In fact, SCE does not currently have an approved design or manufacturer to build the type of non-standard 30 MVA transformers associated with System Alternative B. SCE estimates that it could take up to 12 months to design, manufacture, and test the newly proposed transformers (assuming SCE's current vendor has the capability to build this unit). If SCE's current sourcing partner does not have the

⁴ In addition, although not a part of the Proposed Project, the need to construct a new Moorpark-Valdez 66 kV Subtransmission Line – currently anticipated to occur in 2018 as a separate matter – would be accelerated to 2017 to accommodate System Alternative B.
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capability to build the newly proposed units, the lead time to obtain these units from other manufacturers could take anywhere from 16 to 30 months depending on factory manufacturing availability, further delaying the increase of transformation capacity in this ENA.⁵

Yet even after transformers are received from the manufacturer, SCE also has serious concerns about the need to schedule outages to construct the modifications at the three substations. SCE anticipates that it could take between 6 and 12 months to complete the necessary upgrades at each substation (and possibly longer for additional work outside the substation). It would not be possible to do all of the required work at these substations simultaneously because of the need to roll load off the substation buses to other substations. SCE would have to utilize the available capacity at other nearby substations to facilitate the load rolls and might require additional line work to accomplish this work. In addition, it is likely that most of this work could not be done during the summer months due to the heightened demand during that time (which further contributes to the need to roll loads according to changing conditions). As a result, construction of System Alternative B could take as long as 36 months, during which time the ability to roll loads between substations could be substantially limited, thus frustrating achievement of the objectives of increasing capacity, reliability and flexibility for several years.

In addition, even if System Alternative B were feasible and constructible, reliability and flexibility issues associated with operation of that alternative may be substantial, especially because of the limitations associated with the 30 MVA transformers. For example, under existing conditions the failure of a single 15 MVA transformer would result in only the loss of its base nameplate transformation capacity, meaning only that amount (at most) of load would need to be transferred. However, by doubling the size of the transformer, a failure could result in the need to roll up to twice as much load. If other transformers and distribution equipment cannot meet this heightened demand, this flexibility could be compromised further.

Other concerns center around the potential need to replace a 30 MVA transformer. Given the relatively long manufacturing lead time for replacement transformers (currently 32 weeks), SCE typically stocks spare emergency 15 MVA transformers in case of a failure. Yet even if SCE follows the same approach and stocks spare 30 MVA transformers, replacement of a transformer of that size would not be as simple as replacing a 15 MVA transformer. The existing 15 MVA units can be transported from the holding facility fully assembled, filled with oil, and ready to be installed – a process that can be completed within 24 hours in response to a transformer failure or outage. In contrast, SCE estimates that replacing a 30 MVA transformer oil from the spare transformer (the transformers must be stored full of oil and fully assembled to maintain the integrity of the

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⁵ In this regard, the need for certain rating information in each transformer order would be critical, because installation of 30 MVA OA-rated transformers would result in a bank rating of only 60 MVA, which is significantly less than the Planned Loading Limit of 72.8 MVA and emergency loading of 81.2 MVA that SCE employs today.

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transformer core assembly); 2) disassemble and transport the transformer from the storage area to the substation; 3) reassemble the transformer following delivery to the site; 4) pull a vacuum; and 5) refill and process the transformer oil. As a result, this work could add as much as three days to the length of the outage.

In addition to concerns related to the transformers themselves, SCE is also concerned about the ability to shift distribution load between substations during outage conditions (which is an objective that both SCE and the DEIR preparers have identified). The Proposed Project was carefully located for its proximity to existing 16 kV distribution circuits that extend out from three other existing distribution substations. By not constructing a new substation, there is less flexibility to transfer load to adjacent substations under emergency conditions, as there would be one less substation available. Although SCE would likely ultimately have to construct the same number of 16 kV distribution circuits within the ENA during the 10-year planning horizon regardless of whether the Proposed Project or System Alternative B was constructed, some of the new circuits may need to be considerably longer under System Alternative B than under the Proposed Project in order to create stronger ties between Thousand Oaks Substation and Royal Substation (where no direct ties between these substations exist today).

Further, the distribution circuit configuration that would result from implementation of System Alternative B would complicate the switching required to roll loads in response to circuit and/or transformer outages, leading to a potential for switching errors. Similarly, paralleling 16 kV distribution circuits fed from two different 30 MVA transformers could result in distribution SCD that exceeds the rating of distribution line equipment and customers' secondary voltage protection devices. This could result in failed distribution line equipment and may make it impossible to operate some line devices without additional protection to prevent lines and customer equipment from malfunctioning during fault conditions.

Another concern relates to the inability of the substations to serve distribution circuits. Because of the limited space available at each of the three identified substations, it is unknown whether SCE could install the optimum number of distribution circuit getaways at each substation. Under System Alternative B, theoretically, each substation should have the capability of being built-out with 18 separate 16 kV distribution circuits in order to fully utilize the capacity at each substation. However, given the small amount of space remaining at Potrero, Thousand Oaks and Royal substations (space which would be further reduced when larger transformers are installed), System Alternative B would create significant congestion among distribution circuit getaways. If not correctly spaced, this congestion could lead to reliability issues associated with cable failures and duct bank overloads, particularly where underground. As a result, it may only be feasible to construct fewer distribution circuit loads between substations unaddressed. In addition, the fact that some circuitry may not even be constructed would result in a "stranded capacity" concern, a situation where all the transformed power may not be distributed despite larger substations.

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Although it notes in passing that the operational flexibility and reliability of System Alternative B "would be less than under the Proposed Project," the DEIR still states that the alternative "would meet most of the project objectives." Yet the DEIR fails to accurately portray the broad scope of capacity, reliability and flexibility concerns associated with this alternative. While the DEIR recognizes that some of these concerns could arise, it minimizes those concerns by simply concluding that any reduced reliability would only occur on a temporary basis during project construction:

> "Replacement of the existing transformers at one of the substations would temporarily reduce the reliability of the system as existing transformers are taken off line for replacement. If the transformer change out is accomplished during the non-summer period, reliability issues could be minimized or eliminated." (DEIR, at p. 3-25.)

Yet the concerns regarding capacity, reliability and flexibility identified in SCE's comments extend well beyond simply a few construction-period change-outs, and in fact cover a range of issues associated with the *operation* of System Alternative B. Because the Proposed Project has been specifically designed to provide the most comprehensive operational reliability and flexibility benefits, the Final EIR should revise the conclusions from the DEIR and declare that System Alternative B would not achieve these fundamental objectives to the same extent as the Proposed Project.

C. The Full Development Of System Alternative B Would Result In Environmental Impacts That Are Not Disclosed In The DEIR And May Be Greater Than Those Associated With The Proposed Project.

Just as the DEIR fails to accurately depict the challenges of System Alternative B to meet the project objectives, the DEIR also understates the environmental impacts associated with the additional work needed to fully construct System Alternative B. In fact, the DEIR concludes that environmental impacts associated with System Alternative B would be equal to or less than those of the Proposed Project in every respect. Yet that conclusion is not supported by quantitative analyses in the DEIR, which broadly claims that it is not possible to quantify impacts associated with various alternatives. (DEIR, p. 3-6.) SCE fundamentally disagrees with that assertion, and believes that the DEIR's conclusion regarding the comparison of System Alternative B against the Proposed Project is unsupported without such quantification.⁶

The DEIR's conclusion also does not account for the considerable amount of work, beyond that disclosed in the brief description in the DEIR, that would be necessary to construct System Alternative B. If all necessary components had been considered, a more realistic analysis of impacts would show greater impacts in a number of areas, leading to the conclusion that System Alternative V

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⁶ This comment also pertains to the analysis underlying all of the alternatives discussed in the DEIR, not simply System Alternative B.

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B may not, in fact, be environmentally superior to the Proposed Project. A review of some of the SCE-17 impact areas that should be revised is provided below.

Aesthetics

As explained in section IV (A) above, the larger equipment and reconfigured designs at each substation would likely require expansion of the existing substations' footprints. As a result, the existing fence at these substations would likely have to be demolished and reconstructed at property lines rather than with a setback, meaning any existing landscaping would also have to be removed. The DEIR does not disclose potential aesthetic impacts associated with this reduction in landscaping, an omission that could be considerable given that these three substations are located close to urban and residential uses.

In fact, the DEIR's discussion of aesthetics impacts associated with System Alternative B concludes that there would be no impact to aesthetics, since "no new facilities would be constructed, and all changes would take place on and around existing facility footprints." (DEIR, p. 4.1-66.) Yet this assertion is also incorrect, as the more detailed description above demonstrates that a considerable amount of work to subtransmission lines, distribution lines and capacitors would be needed at locations far from Potrero, Thousand Oaks and Royal Substations. Without an analysis of the aesthetics impacts associated with that work (some of which could occur in areas with scenic resources and could involve new and larger poles), the DEIR's conclusion that System Alternative B would have fewer impacts than the Proposed Project requires a leap of logic that is completely unsupported by the evidence and should be discarded and revised. (*See* 14 CCR § 15384(a) (substantial evidence does not include speculation or unsubstantiated opinion).)

Air Quality and Greenhouse Gases:

Based in part on the assumption that construction activities associated with System Alternative B would be limited to "replacing the existing transformers at Royal, Thousand Oaks and Potrero substations," the DEIR concludes that construction activities for this alternative "would result in substantially less criteria pollutant emissions compared to the construction emissions that would result for the Proposed Project." (DEIR, p. 4.3-21, 4.7-10.) Again, this analysis ignores key elements of construction work required for System Alternative B. For example, as discussed above, in order to replace the existing transformers with new ones, additional activities involving emissions from construction equipment and trucks would include demolition of existing foundations, grading work, and import of additional soil. In addition, more emissions are likely to result from construction equipment used by SCE when reconductoring the Moorpark-Royal No. 2 66 kV Subtransmission Line; installing new distribution circuitry, protection equipment and a new capacitor at Malibu Substation; and potentially replacing existing poles. Without accounting for the additional grading, demolition and re-paving activities associated with new foundations, as well as other subtransmission, distribution, and telecommunication work, the DEIR's conclusions regarding.

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these impacts compared to those of the Proposed Project are unsupported.⁷

Noise

For similar reasons, the DEIR's conclusion that System Alternative B would cause fewer noise impacts than the Proposed Project also fails to account for the placement of equipment in the reconfigured substations. Larger transformers would be installed, and they would likely be sited closer to neighboring properties and sensitive receptors than are the existing 15 MVA transformers at Potrero, Thousand Oaks and Royal substations.

Perhaps recognizing the fact that the 30 MVA transformers would likely generate more noise than 15 MVA transformers, the DEIR declares that Mitigation Measure 4.11-SAB-1 would mitigate any noise impacts at Thousand Oaks Substation to less than significant level through the implementation of setbacks, noise walls or other attenuation devices and transformers with special noise control specifications. (DEIR, p. 4.11-24.)⁸ Yet, it is not known whether these measures could successfully reduce noise levels below the standards set forth in any applicable noise ordinance, given the site-specific conditions at the Thousand Oaks Substation. In particular, because the technical specifications of 30 MVA transformers are not detailed in the DEIR and are otherwise unknown, it cannot be assumed that Mitigation Measure 4.11-SAB-1 would adequately reduce noise. As a result, noise levels might remain above applicable noise thresholds even with this measure, in which case noise impacts associated with System Alternative B would remain significant, and this alternative would not be preferable to the Proposed Project.

In sum, the DEIR's designation of System Alternative B as the Environmentally Superior Alternative is predicated on a set of unsubstantiated assumptions and an incomplete description of all of the alternative's necessary components. A more accurate conclusion regarding System

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⁷ It should be noted that the DEIR states in at least two separate places that System Alternative B "would not require the construction of a new substation and associated subtransmission lines." (DEIR, p. 4.8-25, 4.12-7.) This assertion plainly does not acknowledge the need to reconductor the Moorpark-Royal No. 2 Subtransmission Line.

⁸ The DEIR explains that this mitigation measure is necessary because noise levels at Thousand Oaks Substation could exceed decibel level standards set forth in the Thousand Oaks General Plan Noise Element if System Alternative B is implemented. (DEIR, p. 4.11-24.) However, as set forth in more detail in SCE's comment matrix submitted with this letter, pursuant to CPUC General Order 131-D, compliance with policies in the Thousand Oaks General Plan – a local land use document – is not required, and therefore the DEIR misapplies compliance with General Plan noise policies as a CEQA criterion. As a result, the DEIR's analysis of noise, including noise associated with System Alternative B, should be revised so that all noise impacts (and the potential effects of mitigation measures) are appropriately evaluated against an applicable threshold.

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Alternative B is that the alternative may not be environmentally superior to the Proposed Project ' once all potential impacts are considered, even if System Alternative B were feasible (which it may not be). At minimum, all potential impacts associated with every component of this alternative would have to be more fully analyzed to support a complete comparison of System Alternative B against the Proposed Project.

V. The DEIR Significantly Underestimates The Environmental Impacts Associated With Site B.

Repeating the same errors from its analysis of System Alternative B, the DEIR also fails to consider the full scope of work associated with Site B. As a result, the DEIR understates the impacts of Site B, thus contributing to the DEIR's mischaracterization of Site B as also environmentally superior to the Proposed Project on the whole. Because the DEIR fails to consider the impacts associated with certain components of Site B, the DEIR's analyses regarding, at minimum, aesthetics, air quality and noise impacts should be revised to account for the full extent of work needed to construct Site B.

Aesthetics

The DEIR concludes that aesthetics impacts associated with Site B would be less than significant, simply because a landscaping and wall design would be prepared. Yet that conclusion is reached without reference to several other features that would be required as part of this alternative, each of which could add potential aesthetic impacts.

In this regard, a primary consideration that has been overlooked and should be factored into the additional scope is the elevation of Site B. Although the DEIR acknowledges that the elevation of Site B would render views of the substation more accessible to the public (DEIR, p. 4.1-66), it fails to account for a number of other substantial modifications to the existing landscape resulting from this elevation that would significantly impact the existing visual quality. For example, pole heights would likely have to be increased due to the fact the substation would be located on a hill significantly higher than the grade of Madera Road. Significant grading would be necessary to provide a suitable site for development of the substation, and development of the substation footprint would require the construction of an approximately 16 foot high wall, which would be located at the top of the new elevated grade, which itself would be several feet higher than the wall that is currently on the site. Accordingly, multiple wall facades spanning dozens of vertical feet above Madera Road would be visible to the public. Any analysis of aesthetics must take these considerations into account.

But rather than analyze the impacts associated with these additional components, the DEIR simply concludes that aesthetics impacts at Site B would be less than significant once landscaping is installed. Such a cursory review of aesthetics impacts does not rise to the level of substantial evidence as required by CEQA. (14 CCR § 15384(a).)

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Noise

The DEIR's analysis of noise impacts related to Site B is similarly flawed. Although the DEIR recognizes that additional equipment would be required for demolition, it concludes that any noise impacts associated with demolition would be offset by the fact that reduced cut and fill activities would result in less noise impacts than the Proposed Project. (DEIR, p. 4.11-23.) However, that conclusion apparently does not consider the substantial amount of grading that will be required in order to prepare the site for the substation (as described above). This additional work could lead to substantially more noise from construction activities, a concern that is especially sensitive given Site B's proximity to the Tutor Time daycare facility.

Air Quality and Greenhouse Gas Emissions

The analysis of Site B's air quality impacts is also unsupported as it does not provide any quantification of construction emissions. That quantification must necessarily include the substantial amount of grading discussed above, as well as the construction of the 16 foot wall that will be required. Site B will also likely require an additional access road, or modification of the existing driveway, in order to provide enough space for construction. This additional access was not accounted for in the air quality analysis. Finally, the impact analysis for Site B does not fully analyze the details associated with the demolition work and cut and fill activities that will be required for Site B. For instance, the parcel currently contains a multi-level abandoned concrete building and other surface structures, a garage, paved parking areas and underground facilities, all of which will require demolition and removal as part of construction. As discussed in the noise section above, the conclusion that air quality impacts would be offset by reduced cut and fill activities fails to account for the additional grading required to prepare the substation site and expanded access roads. This is especially true given that the air quality analysis is not supported by any calculation of the emissions associated with these construction activities.

VI. The DEIR Significantly Underestimates The Environmental Impacts Associated With Alignment 3.

Consistent with its shortcomings in describing the other alternatives, the DEIR also fails to account for the additional scope of work that will be required for Alignment 3. Failure to account for this additional scope leads to conclusions about environmental impacts that are simply unsupported by the evidence. A representative sample of these erroneous conclusions follows.

Aesthetics

With respect to aesthetics impacts, the DEIR concludes that Alignment 3 would be less impactful than the Proposed Project because "pole removal and installation would be reduced" and "Visual impacts to scenic roads would be less than for the Proposed Project east of Sunset Valley Road because wooden poles in this segment would not be removed." (DEIR, p. 4.1-65.) However, the installation of telecommunications lines west of Highway 23 may in fact necessitate the removal

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of existing poles and replacement with larger ones (depending on the results of windloading tests). Additionally, construction of a Hilfiker wall and the widening of some access roads may still be required under this alternative, and the development of a large construction pad to support the proposed underground subtransmission line adjacent to Highway 23 would likely still be required. Yet the impacts associated with these details were not included in the DEIR. All of this additional scope will likely change the aesthetics landscape in ways not accounted for in the DEIR.

Air Quality and Greenhouse Gas Emissions

Similarly, with respect to air quality and greenhouse gas emissions impacts, the DEIR concludes that construction activities would result in lower overall emissions compared to the Proposed Project. (DEIR, p. 4.3-20.) Yet this conclusion again fails to account for equipment emissions associated with the following components that are not considered in the DEIR's analysis: 1) installation of a Hilfiker wall and widening of some access roads east of Highway 23 would still be required; 2) existing poles may need to be replaced with larger ones subject to windloading for the telecommunications components, and 3) potential grading of existing topography and construction of additional or modified access roads, retaining wall(s) and a construction pad to support subtransmission line installation adjacent to Highway 23.

Having omitted a detailed discussion of all of these construction components, the DEIR's analysis of Site B and Alignment 3 fails to substantiate the conclusions that these alternatives would be environmentally superior to the Proposed Project. This lack of supporting evidence is further compounded by the fact that the DEIR fails to provide quantitative comparisons for those impact areas where numeric thresholds apply (such as noise and pollutant emissions). Accordingly, the Final EIR should revise the conclusions stated in the DEIR and declare that the Proposed Project would be no less superior than the other alternatives.

VII. Conclusion

Despite the DEIR's thorough discussion of the Proposed Project, the analysis of alternatives in the DEIR does not account for technical limitations associated with the Environmentally Superior Alternative. Those limitations would likely inhibit achievement of the fundamental objectives of increasing operational flexibility and reliability, and may in fact render the alternative infeasible altogether. In addition, the DEIR also fails to account for a large amount of necessary work associated with the Environmentally Superior Alternative (assuming it were feasible), as well as additional work necessary to construct other project alternatives – work that could lead to additional undisclosed environmental impacts. Given these errors, the DEIR's conclusion that three alternatives would feasibly achieve project objectives and would be environmentally superior to the Proposed Project is not supported by the evidence. That conclusion should be revised in the Final EIR to more accurately account for the limitations and impacts associated with those alternatives.

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Despite these issues, SCE appreciates the CPUC's work in analyzing the Proposed Project, and the opportunity to provide these comments on the DEIR. We look forward to the CPUC's preparation of a Final EIR that is consistent with the evidence provided in this letter and the enclosed comments table.

Very truly yours,

Tammy Jones Southern California Edison Company

TJ:tlt

Enclosure

cc: Mike Manka, ESA

P.O. Box 800

2244 Wainut Grove Ave.

Rosemead, California 91770 (626) 302-6634

Fax (626) 302-1926

LAW #1840213

BIORESOURCE CONSULTANTS, INC P.O. Box 1539 310 E Matilija Street Ojai, CA 93023 805.646-9006 x 17 805.646.3870 fax Steve@BioRC.com	
November 4, 2011	
Andrew Keller, Senior Biologist Southern California Edison Corporate Environment, Health & Safety 1218 South Fifth Avenue Monrovia, CA 91016	
RE: Certified Arborist Assessment for the Presidential Substation Project in Thousand Oaks, Ventura County, CA.	
Dear Andrew:	
This letter summarizes the BioResource Consultants, Inc (BRC) findings with respect to the certified arborist assessment for a portion of the Proposed Presidential Substation Project and Alternative Substransmission Alignment 3, as represented in the Presidential Draft Environmental Impact Report dated September 2011.	
Introduction/Project Description	SCF-30
The subject report has been prepared to better understand the potential for trimming and removal of existing trees located along Read Road, with respect to undergrounding of project components along Read Road.	cont.
The Proposed Project will consist of a new substation and a new 66-kilovolt (kV) subtransmission line route. In addition, the Project will include the removal of approximately 89 distribution poles and 9 subtransmission poles located within existing rights-of-way, and their replacement with approximately 66 subtransmission poles to accommodate a new 66-kV subtransmission line that would feed the project from 2 existing 66-kV subtransmission lines. Construction of the new subtransmission line would occur within approximately 3.5 miles of existing right-of-way.	
Alternative Substransmission Alignment 3, as described in the DEIR, would construct two new 66 kV sub-transmission source lines. The origination point of the source lines would be the same as the Proposed Project, however additional portions of this alternative would be installed underground (CPUC, 2010).	
Additional details regarding both the Proposed Project and Alternative Alignment 3 can be found in the Presidential DEIR.	

 $1 \downarrow$

 $_2\Psi$

Methods

Tom Bostrom (Bostrom & Associates Inc.), a certified arborist contracted with BRC, and Cedrick Villasenor (BRC botanist) conducted a reconnaissance-level arborist survey on October 3, 2011 to determine the location, species and diameter at breast height (dbh) of trees located along a portion of the proposed Presidential Substation project and Alternative Subtransmission Alignment 3 located along Read Road in unincorporated Ventura County, California. The location of the trees with dbh and canopy structure was mapped on SCE project design drawings (Appendix A).



Figure 1. Surveyed Portion of the Project.

Field Survey Results

A total of 55 trees were identified during the survey. Twelve of the trees are California native trees, with the remainder non-native ornamental trees. **Table 1** lists the individual trees per species with dbh. Refer to the Appendix A for the location of trees.

BioResource Consultants, Inc. CWA-3865 Certified Arborist Survey Presidential Substation Project Thousand Oaks, Ventura County, California

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Common Name	Scientific Name	DBH	Native – Non Native
	She	eet 4	
Coast live oak	Quercus agrifolia	19	N
Coast live oak	Quercus agrifolia	16	N
California walnut	Juglans californica	13.8.9.9.8	N
Peruvian pepper	Schinus molle	8.9.12.36	NN
	She	eet 5	1
Coast live oak	Quercua agrifolia	8, 8, 9, 5	N
Coast live oak	Quercus agrifolia	6.6.4.6.6.3.4.3.8	N
Arizona ash	Fraxinus velutina	16, 13	N
Cherry	Prunus sp.	6.5	NN
Cherry	Prunus sp	7.5, 4	NN
Cherry	Prunus sp	13	NN
Cherry	Prunus sp	7.7	NN
Peruvian pepper	Schinus molle	12	NN
Peruvian pepper	Schinus molle	7.4	NN
Red Gum	Eucalyptus	40	NN
	camaldulensis		
Peruvian peeper	Schinus molle	14, 13	NN
Stone pine	Pinus pinea	40, 32	NN
Stone pine	Pinus pinea	40, 32	NN
Stone pine	Pinus pinea	40, 32	NN
Stone pine	Pinus pinea	40, 32	NN
Cherry	Prunus sp.	9, 6, 7	NN
•	She	eet 6	÷
Freemont poplar	Populus freemontii	20	UN
Stone pine	Pinus pinea	6	NN
Valley oak	Quercus lobata	32	N
Stone pine	Pinus pinea	33	NN
Stone pine	Pinus pinea	72	NN
Coast live oak	Quercus agrifolia	18	N
Red gum	Eucalyptus	24	NN
-	camaldulensis		
Stone pine	Pinus pinea	22, 23, 30	NN
Stone pine	Pinus pinea	24	NN
Valley oak	Quercus lobata	26	N
Stone pine	Pinus pinea	36	NN
Stone pine	Pinus pinea	32, 26	NN
Stone pine	Pinus pinea	30	NN
Stone pine	Pinus pinea	64	NN
Otana mina	Pinus ninea	32	NN

BioResource Consultants, Inc. CWA-3865 Certified Arborist Survey

Presidential Substation Project Thousand Oaks, Ventura County, California

Common Name	Scientific Name	DBH	Native – Non Native	⋔
Coast live oak	Quercua agrifolia	42	N	
Stone pine	Pinus pinea	40	NN	
Stone pine	Pinus pinea	30, 30	NN	
Red gum	Eucalyptus camaldulensis	24, 30, 24	NN	
Peruvian pepper	Schinus mollle	12	NN	
Peruvian pepper	Schinus mollle	12	NN	
Peruvian pepper	Schinus mollle	12	NN	
Peruvian pepper	Schinus mollle	12	NN	
Peruvian pepper	Schinus mollle	12	NN	
	She	eet 7		
Peruvian pepper	Schinus mollle	17, 13, 7, 11	NN]
Peruvian pepper	Schinus mollle	12, 14, 9, 7	NN	SCE-30
Peruvian pepper	Schinus mollle	12, 8, 9, 22	NN	
Red oak	Quercus ruber	6	NN	
Arizona ash	Fraxinus velutina	6	N	
Peruvian pepper	Schinus mollle	24, 11, 20	NN	
Peruvian pepper	Schinus mollle	6	NN	
	She	eet 8		
Red gum	Eucalyptus camaldulensis	8	NN	
Red gum	Eucalyptus camaldulensis	44	NN	
Peruvian pepper	Schinus mollle	5	NN]

NOTES

DBH is in inches N – Native NN – Non-Native Un - Unknown

Conclusion/Recommendations

Excavation from the proposed project and alternative subtransmission alignment 3 could potentially impact trees along the proposed alignment. Impacts could result in compaction, root exposure, root damage or trimming resulting in degradation of an individual tree or loss. To reduce impacts, ground disturbance should be minimized or avoided within the dripline/canopy and protective fencing can be placed around the tree protection zone. We recommend that all ministerial local tree ordinance permits should be obtained and conditions for avoidance and minimization should be implemented.

Sincerely,

Stephen Jones Senior Botanist/Permitting Specialist

cc: Brian E. Holly, Senior Project Manager/Ecologist

SCE-30 cont.



Appendix A Tree Location Design Drawings SCE-30 cont.

BioResource Consultants, Inc. CWA-3865 Certified Arborist Survey Presidential Substation Project Thousand Oaks, Ventura County, California



Comment Letter SCE



Comment Letter SCE



Comment Letter SCE







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					DIALO	BMC -
	СО	ROC	NOx	SOx	PM10	PM2.5
Construction Activity	(lb/day)	(lb/day)	(Ib/day)	(lb/day)	(Ib/day)	(Ib/day
Substation	4.5	0.0	0.4	0.0	0.1	0.0
Survey	1.5	0.2	0.1	0.0	0.1	0.0
5rading	37.8	8.4	81.9	0.1	55.8	9.6
	19.5	3.3	20.8	0.0	66.2	7.8
Neer, Electrical, Wiring, Transformers, Testing,						
	20.5	3.8	20.4	0.0	87.7	9.7
Asphalting, Landscaping	13.9	3.5	13.8	0.0	65.6	7.3
laximum	37.8	8.4	81.9	0.1	87.7	9.7
6 kV Subtransmission Line, Distribution Underg	ground, Tele	communica	ations and	Distributio	n Overhead	
Survey	1.5	0.2	0.1	0.0	8.7	0.9
Sivil Work	27.8	6.0	45.2	0.1	43.5	6.8
Distribution Underground Civil	22.4	4.4	34.1	0.1	2.7	2.0
Distribution Underground Electrical	15.4	3.4	19.4	0.0	1.5	0.9
Remove Existing Wood Poles	8.0	1.9	14.6	0.0	33.1	3.9
SP Footing Installation	14.1	3.0	26.9	0.0	76.5	8.6
Steel Pole Haul, Steel Pole Assembly, Steel Pole						
Frection, Underground Construction	40.7	8.9	69.4	0.1	100.6	12.8
Steel Pole Haul, Steel Pole Assembly, Steel Pole						
Erection, Bore Construction	46.7	10.2	81.9	0.1	101.0	13.1
Guard Structure Installation	10.8	2.3	19.6	0.0	43.9	5.1
Conductor Installation	34.6	8.3	88.7	0.1	57.0	8.0
iber Optic Installation. Distribution Overhead				-		
nstallation	7.2	1.3	4.1	0.0	32.8	3.5
Guard Structure Removal	10.8	2.6	23.1	0.0	54.7	6.3
Remove TSPs	12.1	2.5	18.8	0.0	54.8	6.2
Restoration	16.1	3.7	28.2	0.0	38.0	5.5
Vaximum	46.7	10.2	88.7	0.1	101.0	13.1
Disen Road Getaway				••••		
Civil	77	16	11.3	0.0	10	0.8
/ault Delivery	47	1.0	82	0.0	0.5	0.0
Cable Pulling Cable Splicing Switch Installation	7.4	13	2.9	0.0	0.5	0.7
Paving	1.4	0.2	0.4	0.0	0.0	0.2
Maximum	7.7	1.6	11 2	0.0	10	0.0
	1.1	1.0	11.3	0.0	1.0	0.0

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

Daily Construction	Table 2	2 by Constru	ction Activ	i+./		
Dany Construction				SOr	PM10	PM2 5
Construction Activity	(lb/day)	(lb/day)	(lh/day)	(lb/dav)	(lh/dav)	(lb/dav)
Substation	(invited y)	(10/00)	(10/00)	(invital)	(12/44)	(10, 44)
Substation Survey	1.5	0.2	0.1	0.0	0.1	0.0
Substation Grading	37.8	8.4	81.9	0.1	55.8	9.6
Substation Civil	15.9	2.7	17.6	0.0	44.4	5.5
Substation MEER	1.4	0.2	0.4	0.0	0.1	0.0
Substation Electrical	8.5	1.7	8.9	0.0	22.3	2.7
Substation Wiring	2.4	0.5	0.9	0.0	0.2	0.1
Substation Transformers	6.6	1.3	8.7	0.0	32.8	3.7
Substation Testing	0.8	0.1	0.5	0.0	10.8	1.1
Substation Maintenance Crew Equipment Check	0.9	0.1	1.0	0.0	21.5	2.2
Substation Asphalting	9.9	2.7	11.5	0.0	54.5	6.1
Substation Fencing	3.7	0.6	3.2	0.0	21.8	2.4
Substation Landscaping	4.0	0.9	2.2	0.0	11.0	1.2
66 kV Subtransmission Line, Telecommunicatio	ns and Distr	ibution Ove	rheac			
Subtransmission Line Survey	1.5	0.2	0.1	0.0	8.7	0.9
Subtransmission Civil Work	27.8	6.0	45.2	0.1	43.5	6.8
Subtransmission Remove Existing Wood Poles	8.0	1.9	14.6	0.0	33.1	3.9
Subtransmission Remove TSPs	12.1	2.5	18.8	0.0	54.8	6.2
Subtransmission Steel Pole Haul	5.4	1.2	10.1	0.0	32.7	3.6
Subtransmission Steel Pole Assembly	8.3	1.8	13.1	0.0	43.7	4.9
Subtransmission Steel Pole Erection	8.0	1.8	12.6	0.0	22.2	2.7
Subtransmission TSP Footing Installation	14.1	3.0	26.9	0.0	76.5	8.6
Subtransmission Conductor Installation	34.6	8.3	88.7	0.1	57.0	8.0
Subtransmission Guard Structure Installation	10.8	2.3	19.6	0.0	43.9	5.1
Subtransmission Guard Structure Removal	10.8	2.6	23.1	0.0	54.7	6.3
Subtransmission Underground Construction	19.1	4.1	33.6	0.0	2.0	1.6
Subtransmission Bore Construction	25.0	5.4	46.1	0.1	2.3	1.9
Subtransmission Restoration	16.1	3.7	28.2	0.0	38.0	5.5
Fiber Optic Installation	1.6	0.2	0.6	0.0	32.4	3.2
Distribution Overhead	5.6	1.1	3.5	0.0	0.4	0.2
Distribution Underground						
Distribution Underground Civil	22.4	4.4	34.1	0.1	2.7	2.0
Distribution Underground Electrical	14.2	3.3	19.1	0.0	1.3	0.8
Distribution Underground Electrical	1.1	0.1	0.3	0.0	0.2	0.0
Olsen Road Getaway						
Olsen Road Getaway Civil	7.7	1.6	11.3	0.0	1.0	0.8
Olsen Road Getaway Paving	4.2	1.2	3.9	0.0	0.4	0.3
Olsen Road Getaway Vault Delivery	4.7	1.0	8.2	0.0	0.5	0.4
Olsen Road Getaway Cable Pulling	4.5	0.9	2.4	0.0	0.3	0.2
Olsen Road Getaway Switch Installation	1.5	0.2	0.4	0.0	0.1	0.0
Olsen Road Getaway Cable Splicing	1.5	0.2	0.1	0.0	0.1	0.0

Table 2

SCE-31

cont.

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

3

Table 3Construction Diesel Exhaust PM10 Emissions

Emissions SummarySourcePM10Source(Ib)Equipment Exhaust801Motor Vehicle Exhaust293TOTAL1,094

		Hours/			
	Horse-	Dav		Davs	PM10
Equipment	Power	Used	Number	Used	(lb)
Substation Grading					,
Dozer	305	4	1	90	33.9
Loader	147	4	2	90	42.0
Scraper	267	3	1	90	32.1
Grader	110	3	1	90	20.0
Backhoe	79	2	2	90	15.5
Tamper	174	2	1	90	10.6
Substation Civil					
Excavator	152	4	1	60	13.6
Foundation Auger	79	6	1	15	3.0
Foundation Auger	79	3	1	15	1.5
Backhoe	79	3	2	60	15.5
Skip Loader	75	3	1	60	10.4
Skid Steer Loader	75	3	2	60	10.3
Forklift	83	4	1	60	6.7
17 Ton Crane	125	2	1	45	4.3
Substation Electrical					
Scissor Lift	87	3	2	70	13.7
Manlift	43	3	2	70	7.1
Reach Manlift	87	4	1	70	9.1
15 Ton Crane	125	3	1	35	5.0
Substation Wiring					
Manlift	43	4	1	25	1.7
Substation Transformers					
Forklift	83	6	1	30	5.1
Crane	125	6	1	10	2.9
Substation Asphalting					
Paving Roller	46	4	2	15	3.2
Asphalt Paver	152	4	1	15	4.9
Asphalt Curb Machine	35	3	1	15	1.3
Tractor	45	3	1	15	1.2
Substation Fencing					
Skid Steer Loader	75	8	1	10	2.3
Substation Landscaping					
Tractor	45	6	1	15	2.4
Subtransmission Civil Work					
Grader	250	6	1	35	11.5
Backhoe	79	6	1	35	91

SCE-31 cont.

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

Constructio	Tab n Diesel Ex	ole 3 khaust PM1	0 Emissio	ns		\bigwedge
Loader	147	6	2	35	24.5	
Drum Type Compactor	100	4	1	35	8.0	
Dozer	150	6	1	35	16.1	
Excavator	152	6	1	35	11.9	
Subtransmission Remove Exist	ing Wood	Poles	•			
Rough Terrain Crane Truck	350	6	1	6	2.1	
Compressor Trailer	60	6	1	6	1.8	
Subtransmission Remove TSPs	00	Ű		<u> </u>		
80-Ton Rough Terrain Crane	350	6	1	4	14	
Compressor Trailer	60	5	1	4	1.0	
Backhoe/Front Loader	125	6	1	4	1.0	
Subtransmission Steel Pole Ha		0	1		1.1	
Pough Torrain Crano	350	6	1	17	5.8	
Subtransmission Stool Polo Ass	sombly	0	1	17	5.0	
80 Ton Pough Terroin Crone	350	ß	1	22	11.2	
	330	6	1	33	11.3	
Compressor Trailer	00	5	I	33	0.2	
Subtransmission Steel Pole Ere		<u> </u>	4	22	44.0	
80-Ton Rough Terrain Crane	350	6	1	33	11.3	
Compressor Trailer	60	5	1	33	8.2	
Subtransmission ISP Footing I	nstallation			50	40.4	SCE1-3
Backhoe/Front Loader	125	8	1	50	19.1	aant
Auger Truck	210	5	1	50	6.7	cont.
Boom/Crane Truck	350	5	1	50	14.3	
Subtransmission Conductor Ins	stallation					
Bucket Truck	250	8	4	12	18.9	
Drum Straw Line Puller	300	6	1	12	3.9	
Static Truck/Tensioner	350	2	1	12	1.3	
Boom/Crane Truck	350	6	2	12	8.2	
Subtransmission Guard Structu	ire Installa	tion				
Bucket Truck	250	4	1	4	0.8	
Compressor Trailer	60	6	1	4	1.2	
Auger Truck	210	6	1	4	0.6	
Rough Terrain Truck	125	8	1	4	0.9	
Subtransmission Guard Structu	ire Remova	al				
Bucket Truck	250	4	1	3	0.6	
Compressor Trailer	60	6	1	3	0.9	
Rough Terrain Crane	350	8	1	3	1.4	
Subtransmission Underground	Constructi	ion				
Backhoe/Front Loader	125	6	1	28	8.0	
Compressor Trailer	60	4	1	28	5.6	
Concrete Saw	40	6	1	28	9.3	
Asphalt Grinder	175	6	1	28	7.8	
Crane Truck	350	8	1	28	12.8	
Subtransmission Bore Construe	ction	Ť				
Rubber Tired Backhoe	126	6	1	22	63	
Boom/Crane Truck	350	8	1	22	10.0	
Excavator	152	6	1	22	7.5	
Welder	150	8	1	22	9.4	
Bore Machine with Power Deck	300	Q Q	1	22		
	500	0	I I	1 44	1 1.1	112

Table 3

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

3.4-36

Constructio	n Diesel Ex	khaust PM ²	I0 Emissio	ns	
Subtransmission Restoration					
Grader	250	6	1	4	1.3
Backhoe/Front Loader	125	6	1	4	1.1
Drum Type Compactor	100	6	1	4	1.4
Dozer	150	6	1	4	1.8
Distribution Underground Civil					
Backhoe	79	8	2	62	42.8
Roller	100	8	1	62	28.5
Grinder	175	8	1	62	23.2
Distribution Underground Elect	rical				
Rodder Truck	35	8	2	43	15.7
Cable Dolly	9	8	1	43	1.0
Double Bucket Truck	250	8	1	43	18.7
Olsen Road Getaway Civil					
Backhoe	79	8	2	104	71.8
Olsen Road Getaway Paving					
Paving Roller	46	8	1	7	1.5
Olsen Road Getaway Vault Deli	very				
Crane	125	4	2	9	3.4
Olsen Road Getaway Cable Pul	ling				
Rodder Truck	35	8	1	10	1.8
Cable Carousel	9	8	1	10	0.2
Distribution Overhead					
Wire Dolly	9	8	1	55	1.2
Wire Pulling Dolly	35	8	1	55	10.0
TOTAL					801.3

Table 3	
Construction Diesel Exhaust PM10 Em	nissions

SCE-31 cont.

Motor Vehicle Exhaust								
	Miles/ Day per		Days	PM10				
Vehicle Type	Vehicle	Number	Used	(lb)				
Substation Grading								
Water Truck	10	1	90	1.0				
Tool Truck	5	1	90	0.2				
Dump Truck	40	47	90	189.8				
Substation Civil								
Water Truck	10	1	60	0.7				
Tool Truck	5	1	60	0.1				
Dump Truck	10	1	60	0.7				
Substation MEER								
Carry-all Truck	5	1	20	0.1				
Stake Truck	5	1	20	0.1				
Substation Electrical								
Crew Truck	30	2	70	1.6				
Substation Transformers								
Crew Truck	30	2	30	0.7				
Low Bed Truck	30	1	30	1.0				
Substation Testing								
Crew Truck	30	1	80	0.9				

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

Constructio	n Diesel Ex	chaust PM	10 Emissior	าร		
Substation Maintenance Crew F	auinment	Check			1	
Maintenance Truck	30	2	30	07	1	
Substation Asphalting			00	0.1	1	
Crew Truck	30	2	15	0.3	1	
Stake Truck	10	1	15	0.2	1	
Dump Truck	10	2	15	0.2	1	
Substation Fencing	10	2	10	0.0	1	
Elathed Truck	10	1	10	0.1	1	
Substation Landscaping	10		10	0.1	1	
	10	1	15	0.2	4	
Subtransmission Civil Work	10		15	0.2	4	
Water Truck	10	1	25	0.4	4	
1 Top Crow Cob. 4x4	10	1	35	0.4	4	
	10	2	30 25	0.3	4	
	10	2	30	0.0	4	
LOWDOY TRUCK/TRAILER			30	4.9	4	
Subtransmission Remove Exist		Poles	0	0.4	4	
1 Ion Crew Cab Flat Bed, 4x4	30	1	6	0.1	4	
Flat Bed Truck/Trailer	30	2	6	0.4	4	
Subtransmission Remove TSPs					-	
1 Ion Crew Cab Flat Bed, 4x4	30	2	4	0.1	-	
Dump Truck	30	1	4	0.1	-	50
Subtransmission Steel Pole Ha	ul		. –		-	con
Flat Bed Truck/Trailer	30	1	17	0.6	-	
Subtransmission Steel Pole As	sembly					
1 Ton Crew Cab Flat Bed, 4x4	30	2	33	0.7		
Subtransmission Steel Pole Ere	ction					
1 Ton Crew Cab Flat Bed, 4x4	30	1	33	0.4		
Subtransmission TSP Footing I	nstallation					
Crew Truck	10	1	50	0.2		
Water Truck	10	1	50	0.6		
Concrete Truck	60	4	50	13.5		
Dump Truck	60	1	50	3.4		
Subtransmission Conductor Ins	stallation]	
1 Ton Crew Cab Flat Bed, 4x4	10	2	12	0.1		
Wire Truck & Trailer	30	2	12	0.8]	
Dump Truck	60	1	12	0.8	1	
Subtransmission Guard Structu	ire Installa	tion			1	
1 Ton Crew Cab Flat Bed, 4x4	10	1	4	0.0]	
Bucket Truck	10	1	4	0.0	1	
Extendable Flatbed Pole Truck	10	1	4	0.0	1	
Subtransmission Guard Structu	ire Remova	al			1	
1 Ton Crew Cab Flat Bed, 4x4	10	1	3	0.0	1	
Bucket Truck	10	1	3	0.0	1	
Extendable Flatbed Pole Truck	10	2	3	0.1	1	
Subtransmission Underground	Constructi	on –	Ť	0.1	1	
1 Ton Flat Bed Truck	60	1	28	19	1	
	60	2	28	3.8	1	
Subtransmission Bore Constru	ction		20	0.0	1	
					1	

Table 3

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011 7

	Tab	le 3				\uparrow
Construction	n Diesel Ex	haust PM [•]	10 Emissior	ıs		
Dump Truck	60	1	22	1.5	1	
Subtransmission Restoration						
1 Ton Crew Cab, 4x4	10	1	4	0.0		
Water Truck	10	1	4	0.0		
Lowboy Truck/Trailer	60	1	4	0.3		
Fiber Optic Installation						
Heavy Duty Truck	10	2	10	0.2		
Distribution Underground Civil					1	
Dump Truck	60	4	62	16.7		
Flatbed Truck	60	1	62	4.2	1	
Concrete Truck	60	4	62	16.7		
Distribution Underground Elect	rical					0054
Rodder Truck	10	1	43	0.5		SCE1
Double Bucket Truck	10	1	43	0.5	1	cont.
Distribution Underground Elect	rical				1	
Line Truck	10	1	2	0.0	1	
Olsen Road Getaway Civil					1	
Dump Truck	60	1	104	7.0		
Crew Truck	10	2	104	0.8		
Concrete Truck	60	1	104	7.0	1	
Olsen Road Getaway Paving						
Dump Truck	60	1	7	0.5	1	
Crew Truck	10	1	7	0.0	1	
Olsen Road Getaway Vault Deliv	very				1	
Flatbed Truck with Crane	60	1	9	0.6		
Olsen Road Getaway Switch Ins	tallation				1	
Line Truck	10	1	10	0.1		
Distribution Overhead						
Line Truck	10	2	55	1.2		
TOTAL				293.1		

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Table 4 Substation Survey

Emissions Summary								
	со	ROC	NOx	SOx	PM10	PM2.5		
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0		
Vehicle Exhaust	1.5	0.2	0.1	0.0	0.0	0.0		
Vehicle Fugitive					0.1	0.0		
Earthwork Fugitive					0.0	0.0		
Total	1.5	0.2	0.1	0.0	0.1	0.0		

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Pickup Truck	60	2	0.8	0.1	0.1	0.0	0.0	0.0
Worker Commuting	60	2	0.7	0.1	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.5	0.2	0.1	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Road	Miles/ Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Pickup Truck	Paved	60	2	0.0	0.0
Pickup Truck	Unpaved	0	2	0.0	0.0
Worker Commuting	Paved	60	2	0.0	0.0
Worker Commuting	Unpaved	0	2	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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Table 5 Substation Grading

Emissions Summary									
	со	ROC	NOx	SOx	PM10	PM2.5			
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	17.3	4.1	33.3	0.0	1.7	1.6			
Vehicle Exhaust	20.5	4.3	48.6	0.1	2.1	2.0			
Vehicle Fugitive					43.1	4.2			
Earthwork Fugitive					8.9	1.8			
Total	37.8	8.4	81.9	0.1	55.8	9.6			

Construction Equipment Exhaust Emissions										
Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/dav) ^a	ROC	NOx (lb/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/dav) ^a	PM2.5 (lb/dav) ^a	
Dozer	305	4	1	4.1	1.1	9.6	0.0	0.4	0.3	
Loader	147	4	2	5.0	1.0	8.1	0.0	0.5	0.4	
Scraper	267	3	1	3.9	1.0	9.0	0.0	0.4	0.3	
Grader	110	3	1	1.6	0.4	2.5	0.0	0.2	0.2	
Backhoe	79	2	2	1.4	0.3	2.0	0.0	0.2	0.2	
Tamper	174	2	1	1.2	0.3	2.1	0.0	0.1	0.1	
Total Equipment Exhaust				17.3	4.1	33.3	0.0	1.7	1.6	

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

wotor venicle Exhaust Emission	Motor	e Exhaust Emissio	ons
--------------------------------	-------	-------------------	-----

	Miles/ Dav per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Water Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Tool Truck	5	1	0.0	0.0	0.1	0.0	0.0	0.0
Pickup Truck	15	1	0.1	0.0	0.0	0.0	0.0	0.0
Dump Truck	40	47	15.3	3.7	47.8	0.1	2.1	1.9
Worker Commuting	60	15	5.0	0.6	0.4	0.0	0.0	0.0
Total Vehicle Exhaust			20.5	13	18.6	01	21	20

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

No. dump trucks = 470 CY/day / 10 CY/truck

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Water Truck	Paved	5	1	0.0	0.0
Water Truck	Unpaved	5	1	10.7	1.1
Tool Truck	Paved	0	1	0.0	0.0
Tool Truck	Unpaved	5	1	10.7	1.1
Pickup Truck	Paved	10	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Dump Truck	Paved	30	47	0.5	0.0
Dump Truck	Unpaved	0.1	47	10.1	1.0
Worker Commuting	Paved	60	15	0.3	0.0
Worker Commuting	Unpaved	0.2	15	2.7	0.3
Total Vehicle Fugitive				43.1	4.2

Total Vehicle Fugitive
 a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

			-	
	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping ^b	CY/Day	1,000	1.0	0.2
Bulldozing, Scraping and Grading	Hours/Day	10	3.5	0.7
Storage Pile Wind Erosion ^c	Acres	0.2	4.4	0.9
Total Earthwork Fugitive			8.9	1.8

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

^b Peak daily estimated from total of 40,000 CY over 90 days

^c Based on 1,000 CY in cone 9 ft. tall x 100 ft. diameter

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Table 6 Substation Civil

Emissions Summary										
	SOx	PM10	PM2.5							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	12.4	2.3	16.7	0.0	1.2	1.1				
Vehicle Exhaust	3.5	0.4	0.9	0.0	0.0	0.0				
Vehicle Fugitive					43.1	4.3				
Earthwork Fugitive					0.0	0.0				
Total	15.9	2.7	17.6	0.0	44.4	5.5				

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Excavator	152	4	1	2.7	0.5	3.8	0.0	0.2	0.2
Foundation Auger	79	6	1	2.8	0.3	3.0	0.0	0.2	0.2
Backhoe	79	3	2	2.1	0.5	2.9	0.0	0.3	0.2
Skip Loader	75	3	1	1.3	0.3	1.9	0.0	0.2	0.2
Skid Steer Loader	75	3	2	1.7	0.3	2.1	0.0	0.2	0.2
Forklift	83	4	1	0.9	0.2	1.2	0.0	0.1	0.1
17 Ton Crane	125	2	1	1.0	0.2	1.7	0.0	0.1	0.1
Total Equipment Exhaust				12.4	2.3	16.7	0.0	1.2	1.1

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Water Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Tool Truck	5	1	0.0	0.0	0.1	0.0	0.0	0.0
Dump Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Worker Commuting	60	10	3.3	0.4	0.3	0.0	0.0	0.0
Total Vehicle Exhaust			3.5	0.4	0.9	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Road	Miles/ Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Water Truck	Paved	5	1	0.0	0.0
Water Truck	Unpaved	5	1	10.7	1.1
Tool Truck	Paved	0	1	0.0	0.0
Tool Truck	Unpaved	5	1	10.7	1.1
Dump Truck	Paved	0	1	0.0	0.0
Dump Truck	Unpaved	10	1	21.4	2.1
Worker Commuting	Paved	60	10	0.2	0.0
Worker Commuting	Unpaved	0.2	10	1.8	0.2
Total Vehicle Fugitive				43.1	4.3

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping ^b	CY/Day	10	0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

^b Estimate

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

Table 7 Substation MEER

Emissions Summary										
	CO	CO ROC NOx S		SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0				
Vehicle Exhaust	1.4	0.2	0.4	0.0	0.0	0.0				
Vehicle Fugitive					0.1	0.0				
Earthwork Fugitive					0.0	0.0				
Total	1.4	0.2	0.4	0.0	0.1	0.0				

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Carry-all Truck	5	1	0.0	0.0	0.1	0.0	0.0	0.0
Stake Truck	5	1	0.0	0.0	0.1	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.4	0.2	0.4	0.0	0.0	0.0

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^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Carry-all Truck	Paved	0	1	0.0	0.0
Carry-all Truck	Unpaved	0	1	0.0	0.0
Stake Truck	Paved	0	1	0.0	0.0
Stake Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

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Table 8 Substation Electrical

Emissions Summary										
	CO	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	5.0	1.3	7.7	0.0	0.6	0.5				
Vehicle Exhaust	3.5	0.4	1.3	0.0	0.0	0.0				
Vehicle Fugitive					21.7	2.1				
Earthwork Fugitive					0.0	0.0				
Total	8.5	1.7	8.9	0.0	22.3	2.7				

Construction Equipment Exhaust Emissions											
Equipment	Horse-	Hours/ Day	Number	CO	ROC	NOx	SOx	PM10	PM2.5		
Spinger Lift	07	oseu	Number	(10/0ay)			(ib/day)				
	0/	3	2	1.0	0.4	2.4	0.0	0.2	0.2		
Manlift	43	3	2	1.1	0.4	1.1	0.0	0.1	0.1		
Reach Manlift	87	4	1	1.0	0.2	1.6	0.0	0.1	0.1		
15 Ton Crane	125	3	1	1.5	0.3	2.5	0.0	0.1	0.1		
Total Equipment Exhaust				5.0	1.3	7.7	0.0	0.6	0.5		

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/		~~~	BOC	NOv	80×	DM10	DM2.5
	Day per		00	ROC	NUX	30%	FINITO	FIVIZ.J
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Crew Truck	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Worker Commuting	60	10	3.3	0.4	0.3	0.0	0.0	0.0
Total Vehicle Exhaust			3.5	0.4	1.3	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Poad	Miles/		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Crew Truck	Paved	25	2	0.0	0.0
Crew Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	10	0.2	0.0
Worker Commuting	Unpaved	0.2	10	1.8	0.2
Total Vehicle Fugitive				21.7	2.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None				
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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cont.

Table 9 Substation Wiring

Emissions Summary											
CO ROC NOX SOX PM10											
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)					
Equipment Exhaust	0.7	0.3	0.8	0.0	0.1	0.1					
Vehicle Exhaust	1.7	0.2	0.1	0.0	0.0	0.0					
Vehicle Fugitive					0.1	0.0					
Earthwork Fugitive					0.0	0.0					
Total	2.4	0.5	0.9	0.0	0.2	0.1					

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
Manlift	43	4	1	0.7	0.3	0.8	0.0	0.1	0.1
Total Equipment Exhaust				0.7	0.3	0.8	0.0	0.1	0.1

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Worker Commuting	60	5	1.7	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.7	0.2	0.1	0.0	0.0	0.0
a								

Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Road	Miles/ Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Worker Commuting	Paved	60	5	0.1	0.0
Worker Commuting	Unpaved	0.2	5	0.9	0.1
Total Vehicle Eugitive				0 1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
one				
otal Earthwork Fugitive			0.0	0.0

N Te Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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cont.

Table 10 Substation Transformers

Emissions Summary											
CO ROC NOX SOX PM10											
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)					
Equipment Exhaust	4.2	0.9	6.8	0.0	0.5	0.4					
Vehicle Exhaust	2.4	0.3	1.9	0.0	0.1	0.1					
Vehicle Fugitive					32.3	3.2					
Earthwork Fugitive					0.0	0.0					
Total	6.6	1.3	8.7	0.0	32.8	3.7					

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
Forklift	83	6	1	1.3	0.3	1.8	0.0	0.2	0.2		
Crane	125	6	1	2.9	0.7	5.0	0.0	0.3	0.3		
Total Equipment Exhaust				4.2	0.9	6.8	0.0	0.5	0.4		

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Crew Truck	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Low Bed Truck	30	1	0.2	0.1	0.8	0.0	0.0	0.0
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.4	0.3	1.9	0.0	0.1	0.1

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cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Crew Truck	Paved	25	2	0.0	0.0
Crew Truck	Unpaved	5	2	21.4	2.1
Low Bed Truck	Paved	25	1	0.0	0.0
Low Bed Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0.2	6	1.1	0.1
Total Vehicle Fugitive				32.3	3.2

" Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5	
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a	
None					1
Total Earthwork Fugitive			0.0	0.0	Ĺ

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011
Table 11 Substation Testing

Emissions Summary										
	со	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0				
Vehicle Exhaust	0.8	0.1	0.5	0.0	0.0	0.0				
Vehicle Fugitive					10.8	1.1				
Earthwork Fugitive					0.0	0.0				
Total	0.8	0.1	0.5	0.0	10.8	1.1				

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Crew Truck	30	1	0.1	0.0	0.5	0.0	0.0	0.0
Worker Commuting	60	2	0.7	0.1	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			0.8	0.1	0.5	0.0	0.0	0.0

SCE-31 cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road	Miles/ Day per Vehicle	Number	PM10	PM2.5
venicie Type	iype	VEILLE	Number	(ib/uay)	(ib/uay)
Crew Truck	Paved	25	1	0.0	0.0
Crew Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	2	0.0	0.0
Worker Commuting	Unpaved	0.2	2	0.4	0.0
Total Vehicle Fugitive				10.8	1.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None				
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

Table 12 Substation Maintenance Crew Equipment Check

Emissions Summary										
	CO ROC NOx SOx PM10									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0				
Vehicle Exhaust	0.9	0.1	1.0	0.0	0.0	0.0				
Vehicle Fugitive					21.5	2.1				
Earthwork Fugitive					0.0	0.0				
Total	0.9	0.1	1.0	0.0	21.5	2.2				

	Construction Equipment Exhaust Emissions											
		Hours/										
	Horse-	Day		со	ROC	NOx	SOx	PM10	PM2.5			
Equipment	Power	Used	Number	(lb/day) ^a								
None				0.0	0.0	0.0	0.0	0.0	0.0			
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0			

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Maintenance Truck	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Worker Commuting	60	2	0.7	0.1	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			0.9	0.1	1.0	0.0	0.0	0.0

SCE-31 cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road Type	Miles/ Day per Vehicle	Number	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
Maintenance Truck	Paved	25	2	0.0	0.0
Maintenance Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	2	0.0	0.0
Worker Commuting	Unpaved	0.2	2	0.4	0.0
Total Vehicle Fugitive				21.5	2.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

Activity	Activity Units	Activity Level	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
None				
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

Table 13 Substation Asphalting

Emissions Summary										
CO ROC NOx SOx PM10										
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	7.5	2.3	9.6	0.0	0.7	0.6				
Vehicle Exhaust	2.4	0.3	1.9	0.0	0.1	0.1				
Vehicle Fugitive					53.8	5.4				
Earthwork Fugitive					0.0	0.0				
Asphaltic Paving		0.1								
Total	9.9	2.7	11.5	0.0	54.5	6.1				

	Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5			
Equipment	Power	Used	Number	(lb/day) ^a								
Paving Roller	46	4	2	2.4	0.9	2.1	0.0	0.2	0.2			
Asphalt Paver	152	4	1	3.1	0.7	5.8	0.0	0.3	0.3			
Asphalt Curb Machine	35	3	1	0.9	0.4	0.8	0.0	0.1	0.1			
Tractor	45	3	1	1.0	0.3	0.9	0.0	0.1	0.1			
Total Equipment Exhaust				7.5	2.3	9.6	0.0	0.7	0.6			

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							B 140 F
	Day per		00	ROC	NOX	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Crew Truck	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Stake Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Dump Truck	10	2	0.2	0.0	0.5	0.0	0.0	0.0
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.4	0.3	1.9	0.0	0.1	0.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Dump truck number based on 130 CY asphakt and 145 CY aggregate over 15 days and 10 CY dump truck

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Crew Truck	Paved	25	2	0.0	0.0
Crew Truck	Unpaved	5	2	21.4	2.1
Stake Truck	Paved	5	1	0.0	0.0
Stake Truck	Unpaved	5	1	10.7	1.1
Dump Truck	Paved	5	2	0.0	0.0
Dump Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0.2	6	1.1	0.1
Total Vehicle Fugitive				53.8	5.4

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None				
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Asphaltic Paving VOC Emissions

	Emission	
Area Paved	Factor	ROC
(acre/day) ^a	(lb/acre) ^b	(lb/day) ^c
0.029	2.62	0.1

Assumed twice daily average of 9,400 ft² in 15 days:

2 x 9,400 ft² / 15 days / 43,560 ft² per acre = 0.021 acres

^b From URBEMISS 2007 User's Guide, Appendix A,

http://www.urbemis.com/software/download.html

^c Emissions [lb/day] = Emission factor [lb/acre] x Area paved [acre/day]

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Table 14 Substation Fencing

	Emissions Summary										
	CO	CO ROC NOX SOX PM10 PI									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)					
Equipment Exhaust	2.2	0.4	2.8	0.0	0.2	0.2					
Vehicle Exhaust	1.4	0.2	0.4	0.0	0.0	0.0					
Vehicle Fugitive					21.5	2.1					
Earthwork Fugitive					0.0	0.0					
Total	3.7	0.6	3.2	0.0	21.8	2.4					

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
Skid Steer Loader	75	8	1	2.2	0.4	2.8	0.0	0.2	0.2
Total Equipment Exhaust				2.2	0.4	2.8	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Flatbed Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Pickup Truck	5	1	0.0	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.4	0.2	0.4	0.0	0.0	0.0

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cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Flatbed Truck	Paved	5	1	0.0	0.0
Flatbed Truck	Unpaved	5	1	10.7	1.1
Pickup Truck	Paved	0	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0.2	4	0.7	0.1
Total Vehicle Fugitive				21.5	2.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 15 Substation Landscaping

	Emissions Summary									
	со	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	2.0	0.6	1.8	0.0	0.2	0.1				
Vehicle Exhaust	2.1	0.2	0.4	0.0	0.0	0.0				
Vehicle Fugitive					10.9	1.1				
Earthwork Fugitive					0.0	0.0				
Total	4.0	0.9	2.2	0.0	11.0	1.2				

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Tractor	45	6	1	2.0	0.6	1.8	0.0	0.2	0.1
Total Equipment Exhaust				2.0	0.6	1.8	0.0	0.2	0.1

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Dump Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.1	0.2	0.4	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road Type	Miles/ Day per Vehicle	Number	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Duran Truck	Deved	F	4	(10/44)	(10/44)
	Paved	5		0.0	0.0
Dump Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0.2	6	1.1	0.1
Total Vehicle Fugitive				10.9	1.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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Table 16Subtransmission Line Survey

Emissions Summary									
CO ROC NOx SOx PM10 PM2.									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0			
Vehicle Exhaust	1.5	0.2	0.1	0.0	0.0	0.0			
Vehicle Fugitive					8.7	0.9			
Earthwork Fugitive					0.0	0.0			
Total	1.5	0.2	0.1	0.0	8.7	0.9			

Equipment	Horse- Power	Hours/ Day Used	Number	CO (Ib/day) ^a	ROC (lb/day) ^a	NOx (Ib/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Pickup Truck	10	2	0.1	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.5	0.2	0.1	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Road	Miles/ Day per		PM10	PM2.5
Venicle Type	Гуре	venicle	Number	(Ib/day)	(lb/day)
Pickup Truck	Paved	8	2	0.0	0.0
Pickup Truck	Unpaved	2	2	8.6	0.9
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				8.7	0.9

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 17 Subtransmission Civil Work

Emissions Summary									
	CO ROC NOx SOx PM10								
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	22.5	5.2	40.6	0.0	2.3	2.1			
Vehicle Exhaust	5.3	0.8	4.6	0.0	0.2	0.2			
Vehicle Fugitive					36.8	3.6			
Earthwork Fugitive					4.2	0.9			
Total	27.8	6.0	45.2	0.1	43.5	6.8			

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
Grader	250	6	1	2.7	0.9	9.2	0.0	0.3	0.3		
Backhoe	79	6	1	2.1	0.5	2.9	0.0	0.3	0.2		
Loader	147	6	2	7.5	1.6	12.2	0.0	0.7	0.6		
Drum Type Compactor	100	4	1	1.6	0.4	2.6	0.0	0.2	0.2		
Dozer	150	6	1	4.5	1.1	7.9	0.0	0.5	0.4		
Excavator	152	6	1	4.0	0.8	5.8	0.0	0.3	0.3		
Total Equipment Exhaust				22.5	5.2	40.6	0.0	2.3	2.1		

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		CO	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"
Water Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
1 Ton Crew Cab, 4x4	10	2	0.1	0.0	0.3	0.0	0.0	0.0
Dump Truck	10	2	0.2	0.0	0.5	0.0	0.0	0.0
Lowboy Truck/Trailer	62	2	1.0	0.2	3.2	0.0	0.1	0.1
Worker Commuting	60	12	4.0	0.5	0.3	0.0	0.0	0.0
Total Vehicle Exhaust			5.3	0.8	4.6	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle E	Entrained Par	rticulate N	/latter	Emissi	ions
		Miloc/			

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Water Truck	Paved	5	1	0.0	0.0
Water Truck	Unpaved	5	1	10.7	1.1
1 Ton Crew Cab, 4x4	Paved	8	2	0.0	0.0
1 Ton Crew Cab, 4x4	Unpaved	2	2	8.6	0.9
Dump Truck	Paved	8	2	0.0	0.0
Dump Truck	Unpaved	2	2	8.6	0.9
Lowboy Truck/Trailer	Paved	60	2	0.0	0.0
Lowboy Truck/Trailer	Unpaved	2	2	8.6	0.9
Worker Commuting	Paved	60	12	0.3	0.0
Worker Commuting	Unpaved	0	12	0.0	0.0
Total Vehicle Fugitive				36.8	3.6

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Bulldozing, Scraping and Grading	Hours/Day	12	4.2	0.9
Soil Dropping ^b	CY/Day	168	0.2	0.0
Total Earthwork Fugitive			4.2	0.9

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

^b Peak daily estimated from total of 5,875 CY over 35 days

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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Table 18 Subtransmission Remove Existing Wood Poles

Emissions Summary								
	CO ROC NOX SOX PM10 PM2							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	5.4	1.5	12.4	0.0	0.6	0.6		
Vehicle Exhaust	2.6	0.4	2.2	0.0	0.1	0.1		
Vehicle Fugitive					32.3	3.2		
Earthwork Fugitive					0.0	0.0		
Total	8.0	1.9	14.6	0.0	33.1	3.9		

Construction Equipment Exhaust Emissions									
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
Rough Terrain Crane Truck	350	6	1	3.4	1.0	9.2	0.0	0.3	0.3
Compressor Trailer	60	6	1	2.0	0.5	3.2	0.0	0.3	0.3
Total Equipment Exhaust				5.4	1.5	12.4	0.0	0.6	0.6
^a Emissions []h/daul - Emission faster []h/	(halv One retine time	a flan/day/lay Nu	mahan						

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

Vahiala Tura	Miles/ Day per	Number	CO	ROC	NOx	SOx	PM10	PM2.5
venicie Type	venicie	Number	(ID/day)	(ID/day)	(ID/day)	(ID/day)	(ID/day)	(ID/day)
1 Ton Crew Cab Flat Bed, 4x4	30	1	0.1	0.0	0.5	0.0	0.0	0.0
Flat Bed Truck/Trailer	30	2	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.6	0.4	2.2	0.0	0.1	0.1

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cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	25	1	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	1	10.7	1.1
Flat Bed Truck/Trailer	Paved	25	2	0.0	0.0
Flat Bed Truck/Trailer	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0	6	0.0	0.0
Total Vehicle Fugitive				32.3	3.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5	1
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a	
None			0.0	0.0	1
Total Earthwork Fugitive			0.0	0.0	Ĺ

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Table 19 Subtransmission Remove TSPs

Emissions Summary									
	CO ROC NOX SOX PM10 PM2.								
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	8.6	2.1	16.8	0.0	0.9	0.8			
Vehicle Exhaust	3.5	0.4	2.0	0.0	0.1	0.1			
Vehicle Fugitive					53.8	5.4			
Earthwork Fugitive					0.0	0.0			
Total	12.1	2.5	18.8	0.0	54.8	6.2			

Construction Equipment Exhaust Emissions									
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
80-Ton Rough Terrain Crane	350	6	1	3.4	1.0	9.2	0.0	0.3	0.3
Compressor Trailer	60	5	1	1.6	0.5	2.7	0.0	0.2	0.2
Backhoe/Front Loader	125	6	1	3.5	0.6	5.0	0.0	0.3	0.3
Total Equipment Exhaust				8.6	2.1	16.8	0.0	0.9	0.8
^a Emissions [lb/day] = Emission factor [lb/br]	Oporating time	o [br/dov] x Nu	mbor						

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

Vahiala Tura	Miles/ Day per	Number	CO	ROC	NOx	SOx	PM10	PM2.5
venicie Type	venicie	number	(ib/uay)	(ib/uay)	(ib/uay)	(ib/uay)	(ib/uay)	(ib/uay)
1 Ton Crew Cab Flat Bed, 4x4	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Pickup Truck	30	2	0.4	0.0	0.0	0.0	0.0	0.0
Dump Truck	30	1	0.2	0.1	0.8	0.0	0.0	0.0
Worker Commuting	60	8	2.6	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			3.5	0.4	2.0	0.0	0.1	0.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Road	Miles/ Dav per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	25	2	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	2	21.4	2.1
Pickup Truck	Paved	25	2	0.0	0.0
Pickup Truck	Unpaved	5	2	21.4	2.1
Dump Truck	Paved	25	1	0.0	0.0
Dump Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	8	0.2	0.0
Worker Commuting	Unpaved	0	8	0.0	0.0
Total Vehicle Fugitive				53.8	5.4

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 20Subtransmission Steel Pole Haul

Emissions Summary										
	CO	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	3.4	1.0	9.2	0.0	0.3	0.3				
Vehicle Exhaust	2.0	0.3	0.9	0.0	0.0	0.0				
Vehicle Fugitive					32.3	3.2				
Earthwork Fugitive					0.0	0.0				
Total	5.4	1.2	10.1	0.0	32.7	3.6				

Construction Equipment Exhaust Emissions

	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
Rough Terrain Crane	350	6	1	3.4	1.0	9.2	0.0	0.3	0.3
Total Equipment Exhaust				3.4	1.0	9.2	0.0	0.3	0.3

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Pickup Truck	30	2	0.4	0.0	0.0	0.0	0.0	0.0
Flat Bed Truck/Trailer	30	1	0.2	0.1	0.8	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			2.0	0.3	0.9	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Pickup Truck	Paved	25	2	0.0	0.0
Pickup Truck	Unpaved	5	2	21.4	2.1
Flat Bed Truck/Trailer	Paved	25	1	0.0	0.0
Flat Bed Truck/Trailer	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				32.3	3.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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Table 21 Subtransmission Steel Pole Assembly

Emissions Summary										
	со	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	5.1	1.4	11.9	0.0	0.6	0.5				
Vehicle Exhaust	3.2	0.4	1.2	0.0	0.0	0.0				
Vehicle Fugitive					43.1	4.3				
Earthwork Fugitive					0.0	0.0				
Total	8.3	1.8	13.1	0.0	43.7	4.9				

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
80-Ton Rough Terrain Crane	350	6	1	3.4	1.0	9.2	0.0	0.3	0.3		
Compressor Trailer	60	5	1	1.6	0.5	2.7	0.0	0.2	0.2		
Total Equipment Exhaust				5.1	1.4	11.9	0.0	0.6	0.5		

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab Flat Bed, 4x4	30	2	0.2	0.0	1.0	0.0	0.0	0.0
Pickup Truck	30	2	0.4	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	8	2.6	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			3.2	0.4	1.2	0.0	0.0	0.0

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^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	25	2	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	2	21.4	2.1
Pickup Truck	Paved	25	2	0.0	0.0
Pickup Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	8	0.2	0.0
Worker Commuting	Unpaved	0	8	0.0	0.0
Total Vehicle Fugitive				43.1	4.3

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5	I.
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a	1
None			0.0	0.0	ĺ.
Total Earthwork Fugitive			0.0	0.0	i.

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Table 22 Subtransmission Steel Pole Erection

Emissions Summary											
	CO ROC NOX SOX PM10 PM2.5										
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)					
Equipment Exhaust	5.1	1.4	11.9	0.0	0.6	0.5					
Vehicle Exhaust	2.9	0.3	0.7	0.0	0.0	0.0					
Vehicle Fugitive					21.6	2.1					
Earthwork Fugitive					0.0	0.0					
Total	8.0	1.8	12.6	0.0	22.2	2.7					

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
80-Ton Rough Terrain Crane	350	6	1	3.4	1.0	9.2	0.0	0.3	0.3		
Compressor Trailer	60	5	1	1.6	0.5	2.7	0.0	0.2	0.2		
Total Equipment Exhaust				5.1	1.4	11.9	0.0	0.6	0.5		

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab Flat Bed, 4x4	30	1	0.1	0.0	0.5	0.0	0.0	0.0
Pickup Truck	30	1	0.2	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	8	2.6	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.9	0.3	0.7	0.0	0.0	0.0

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^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	25	1	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	1	10.7	1.1
Pickup Truck	Paved	25	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	8	0.2	0.0
Worker Commuting	Unpaved	0	8	0.0	0.0
Total Vehicle Fugitive				21.6	2.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5	
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a	
None			0.0	0.0	
Total Earthwork Fugitive			0.0	0.0	

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Table 23 Subtransmission TSP Footing Installation

	Emissions Summary									
	CO ROC NOX SOX PM10									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	9.2	2.1	18.6	0.0	0.8	0.7				
Vehicle Exhaust	4.9	0.9	8.2	0.0	0.4	0.3				
Vehicle Fugitive					75.3	7.5				
Earthwork Fugitive					0.0	0.0				
Total	14.1	3.0	26.9	0.0	76.5	8.6				

Construction Equipment Exhaust Emissions										
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5	
Equipment	Power	Used	Number	(lb/day) ^a						
Backhoe/Front Loader	125	8	1	4.7	0.8	6.6	0.0	0.4	0.4	
Auger Truck	210	5	1	1.7	0.4	4.4	0.0	0.1	0.1	
Boom/Crane Truck	350	5	1	2.8	0.8	7.7	0.0	0.3	0.3	
Total Equipment Exhaust				9.2	2.1	18.6	0.0	0.8	0.7	
^a Emissions [lb/day] = Emission factor [lb/b	rl v Oporating tim	o [br/day] x Ni	Imbor							

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Crew Truck	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Water Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Concrete Truck	60	4	2.0	0.5	6.1	0.0	0.3	0.2
Dump Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	7	2.3	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			4.9	0.9	8.2	0.0	0.4	0.3

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Crew Truck	Paved	5	1	0.0	0.0
Crew Truck	Unpaved	5	1	10.7	1.1
Water Truck	Paved	5	1	0.0	0.0
Water Truck	Unpaved	5	1	10.7	1.1
Concrete Truck	Paved	55	4	0.1	0.0
Concrete Truck	Unpaved	5	4	42.9	4.3
Dump Truck	Paved	55	1	0.0	0.0
Dump Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	7	0.1	0.0
Worker Commuting	Unpaved	0	7	0.0	0.0
Total Vehicle Fugitive				75.3	7.5

Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping ^b	CY/Day	14	0.0	0.0
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

^b Based on one footing/day

Emission factors are in Table 49

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Table 24 Subtransmission Conductor Installation

	Emissions Summary									
	CO ROC NOx SOx PM10									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	26.9	7.3	84.8	0.1	2.7	2.5				
Vehicle Exhaust	7.7	1.0	3.9	0.0	0.2	0.2				
Vehicle Fugitive					54.1	5.4				
Earthwork Fugitive					0.0	0.0				
Total	34.6	8.3	88.7	0.1	57.0	8.0				

Construction Equipment Exhaust Emissions										
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5	
Equipment	Power	Used	Number	(lb/day) ^a						
Bucket Truck	250	8	4	15.8	4.1	53.2	0.1	1.6	1.5	
Drum Straw Line Puller	300	6	1	3.3	0.9	9.9	0.0	0.3	0.3	
Static Truck/Tensioner	350	2	1	1.1	0.3	3.3	0.0	0.1	0.1	
Boom/Crane Truck	350	6	2	6.8	2.0	18.4	0.0	0.7	0.6	
Total Equipment Exhaust				26.9	7.3	84.8	0.1	2.7	2.5	

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor	Vehicle	Exhaust	Fmissions
INICIOI	VEIIICIE	LAHAUSL	LIIIISSIUIIS

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab Flat Bed, 4x4	10	2	0.1	0.0	0.3	0.0	0.0	0.0
Wire Truck & Trailer	30	2	0.5	0.1	1.5	0.0	0.1	0.1
Dump Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	20	6.6	0.8	0.6	0.0	0.0	0.0
Total Vehicle Exhaust			7.7	1.0	3.9	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	5	2	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	2	21.4	2.1
Wire Truck & Trailer	Paved	25	2	0.0	0.0
Wire Truck & Trailer	Unpaved	5	2	21.4	2.1
Dump Truck	Paved	55	1	0.0	0.0
Dump Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	20	0.4	0.0
Worker Commuting	Unpaved	0	20	0.0	0.0
Total Vehicle Fugitive				54.1	5.4

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive	Particulate	Matter	Emission	S

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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Table 25 Subtransmission Guard Structure Installation

Emissions Summary									
	CO ROC NOX SOX PM10 PM								
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	8.7	2.1	18.9	0.0	0.9	0.8			
Vehicle Exhaust	2.2	0.3	0.8	0.0	0.0	0.0			
Vehicle Fugitive					43.0	4.3			
Earthwork Fugitive					0.0	0.0			
Total	10.8	2.3	19.6	0.0	43.9	5.1			

Construction Equipment Exhaust Emissions									
	Horse-	Hours/ Day		CO	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"	(lb/day)"
Bucket Truck	250	4	1	2.0	0.5	6.6	0.0	0.2	0.2
Compressor Trailer	60	6	1	2.0	0.5	3.2	0.0	0.3	0.3
Auger Truck	210	6	1	2.1	0.5	5.2	0.0	0.2	0.1
Rough Terrain Truck	125	8	1	2.6	0.5	3.8	0.0	0.2	0.2
Total Equipment Exhaust				8.7	2.1	18.9	0.0	0.9	0.8

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor	Vehicle	Exhaust	Fmissions
INICIOI	venicie	EXIIAUSI	EIIIISSIUIIS

	Miles/ Dav per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab Flat Bed, 4x4	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Pickup Truck	10	1	0.1	0.0	0.0	0.0	0.0	0.0
Bucket Truck	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Extendable Flatbed Pole Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.2	0.3	0.8	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	5	1	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	1	10.7	1.1
Pickup Truck	Paved	5	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Bucket Truck	Paved	5	1	0.0	0.0
Bucket Truck	Unpaved	5	1	10.7	1.1
Extendable Flatbed Pole Truck	Paved	5	1	0.0	0.0
Extendable Flatbed Pole Truck	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0	6	0.0	0.0
Total Vehicle Eugitive				43.0	4.3

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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Table 26 Subtransmission Guard Structure Removal

Emissions Summary									
	CO ROC NOX SOX PM10 P								
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	8.5	2.4	22.1	0.0	1.0	0.9			
Vehicle Exhaust	2.3	0.3	1.0	0.0	0.0	0.0			
Vehicle Fugitive					53.8	5.4			
Earthwork Fugitive					0.0	0.0			
Total	10.8	2.6	23.1	0.0	54.7	6.3			

Construction Equipment Exhaust Emissions									
Hours/ Horse- Day CO ROC NOx SOx PM10 PM									
Equipment	Power	Used	Number	(lb/day) ^a					
Bucket Truck	250	4	1	2.0	0.5	6.6	0.0	0.2	0.2
Compressor Trailer	60	6	1	2.0	0.5	3.2	0.0	0.3	0.3
Rough Terrain Crane	350	8	1	4.5	1.3	12.3	0.0	0.5	0.4
Total Equipment Exhaust				8.5	2.4	22.1	0.0	1.0	0.9
 Environment III. (Also Also Environment Assets on III). 	1	- flevelater der Nie	una la la la						

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab Flat Bed, 4x4	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Pickup Truck	10	1	0.1	0.0	0.0	0.0	0.0	0.0
Bucket Truck	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Extendable Flatbed Pole Truck	10	2	0.2	0.0	0.5	0.0	0.0	0.0
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.3	0.3	1.0	0.0	0.0	0.0

 Total Vehicle Exhaust
 2.3

 a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab Flat Bed, 4x4	Paved	5	1	0.0	0.0
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	5	1	10.7	1.1
Pickup Truck	Paved	5	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Bucket Truck	Paved	5	1	0.0	0.0
Bucket Truck	Unpaved	5	1	10.7	1.1
Extendable Flatbed Pole Truck	Paved	5	2	0.0	0.0
Extendable Flatbed Pole Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0	6	0.0	0.0
Total Vehicle Fugitive				53.8	5.4

Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

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Table 27 Subtransmission Underground Construction

Emissions Summary								
	CO ROC NOx SOx PM10							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	15.6	3.5	28.9	0.0	1.6	1.4		
Vehicle Exhaust	3.5	0.6	4.7	0.0	0.2	0.2		
Vehicle Fugitive					0.2	0.0		
Earthwork Fugitive					0.0	0.0		
Total	19.1	4.1	33.6	0.0	2.0	1.6		

Construction Equipment Exhaust Emissions										
Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (Ib/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a	
Backhoe/Front Loader	125	6	1	3.5	0.6	5.0	0.0	0.3	0.3	
Compressor Trailer	60	4	1	1.3	0.4	2.1	0.0	0.2	0.2	
Concrete Saw	40	6	1	2.7	0.6	4.4	0.0	0.3	0.3	
Asphalt Grinder	175	6	1	3.5	0.6	5.2	0.0	0.3	0.3	
Crane Truck	350	8	1	4.5	1.3	12.3	0.0	0.5	0.4	
Total Equipment Exhaust				15.6	3.5	28.9	0.0	1.6	1.4	

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

Vehicle Type	Miles/ Day per Vehicle	Number	CO (lb/day) ^a	ROC (Ib/day) ^a	NOx (Ib/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/day) ^a	PM2.5 (Ib/day) ^a
1 Ton Flat Bed Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Dump Truck	60	2	1.0	0.2	3.1	0.0	0.1	0.1
Worker Commuting	60	6	2.0	0.2	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			3.5	0.6	4.7	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Flat Bed Truck	Paved	60	1	0.0	0.0
1 Ton Flat Bed Truck	Unpaved	0	1	0.0	0.0
Dump Truck	Paved	60	2	0.0	0.0
Dump Truck	Unpaved	0	2	0.0	0.0
Worker Commuting	Paved	60	6	0.1	0.0
Worker Commuting	Unpaved	0	6	0.0	0.0
Total Vehicle Fugitive				0.2	0.0

Brissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

Activity	Activity Units	Activity Level	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Soil Dropping ^b	CY/Day	28	0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

^b Based on 763 CY over 28 days

Emission factors are in Table 49

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Table 28 Subtransmission Bore Construction

Emissions Summary								
	CO ROC NOX SOX PM10							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	20.9	4.7	41.3	0.1	1.9	1.7		
Vehicle Exhaust	4.1	0.7	4.8	0.0	0.2	0.2		
Vehicle Fugitive					0.2	0.0		
Earthwork Fugitive					0.0	0.0		
Total	25.0	5.4	46.1	0.1	2.3	1.9		

Construction Equipment Exhaust Emissions									
		Hours/		~~~	DOC	Nov	60×	DM40	
	Horse-	Day		.0	RUC	NUX	50x	PINTU	PIVIZ.3
Equipment	Power	Used	Number	(lb/day) ^a					
Rubber Tired Backhoe	126	6	1	3.5	0.6	5.0	0.0	0.3	0.3
Boom/Crane Truck	350	8	1	4.5	1.3	12.3	0.0	0.5	0.4
Excavator	152	6	1	4.0	0.8	5.8	0.0	0.3	0.3
Welder	150	8	1	4.4	1.0	7.8	0.0	0.4	0.4
Bore Machine with Power Pack	300	8	1	4.4	1.1	10.5	0.0	0.3	0.3
Total Equipment Exhaust				20.9	4.7	41.3	0.1	1.9	1.7
			• .						

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Concrete Truck	60	2	1.0	0.2	3.1	0.0	0.1	0.1
Dump Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	8	2.6	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			4.1	0.7	4.8	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Concrete Truck	Paved	60	2	0.0	0.0
Concrete Truck	Unpaved	0	2	0.0	0.0
Dump Truck	Paved	60	1	0.0	0.0
Dump Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	8	0.2	0.0
Worker Commuting	Unpaved	0	8	0.0	0.0
Total Vehicle Fugitive				0.2	0.0

 Total Vehicle Fugitive

 a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

Activity	Activity Units	Activity Level	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Soil Dropping ^b	CY/Day	6	0.0	0.0
Total Earthwork Fugitive			0.0	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

 $^{\rm b}\,$ Based on 120 CY over 22 days

Emission factors are in Table 49

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Table 29 Subtransmission Restoration

Emissions Summary								
	CO ROC NOx SOx PM10 PM2.							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	13.2	3.3	26.1	0.0	1.4	1.3		
Vehicle Exhaust	2.9	0.4	2.1	0.0	0.1	0.1		
Vehicle Fugitive					32.3	3.2		
Earthwork Fugitive					4.2	0.9		
Total	16.1	3.7	28.2	0.0	38.0	5.5		

Construction Equipment Exhaust Emissions									
Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC	NOx (Ib/day) ^a	SOx (Ib/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
Grader	250	6	1	2.7	0.9	9.2	0.0	0.3	0.3
Backhoe/Front Loader	125	6	1	3.5	0.6	5.0	0.0	0.3	0.3
Drum Type Compactor	100	6	1	2.5	0.6	4.0	0.0	0.3	0.3
Dozer	150	6	1	4.5	1.1	7.9	0.0	0.5	0.4
Total Equipment Exhaust				13.2	3.3	26.1	0.0	1.4	1.3

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor	Vehicle	Exhaust	Fmissions
INICIOI	VEIIICIE	LAHAUSL	LIIIISSIUIIS

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
1 Ton Crew Cab, 4x4	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Water Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Lowboy Truck/Trailer	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	7	2.3	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.9	0.4	2.1	0.0	0.1	0.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
1 Ton Crew Cab, 4x4	Paved	5	1	0.0	0.0
1 Ton Crew Cab, 4x4	Unpaved	5	1	10.7	1.1
Water Truck	Paved	5	1	0.0	0.0
Water Truck	Unpaved	5	1	10.7	1.1
Lowboy Truck/Trailer	Paved	55	1	0.0	0.0
Lowboy Truck/Trailer	Unpaved	5	1	10.7	1.1
Worker Commuting	Paved	60	7	0.1	0.0
Worker Commuting	Unpaved	0	7	0.0	0.0
Total Vehicle Fugitive				32.3	3.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Parti	culate N	Matter	Emission	S
	1			

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Bulldozing, Scraping and Grading	Hours/Day	12	4.2	0.9
Total Earthwork Fugitive			4.2	0.9

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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Table 30 Fiber Optic Installation

Emissions Summary								
	CO ROC NOX SOX PM10 PM2.5							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)		
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0		
Vehicle Exhaust	1.6	0.2	0.6	0.0	0.0	0.0		
Vehicle Fugitive					32.4	3.2		
Earthwork Fugitive					0.0	0.0		
Total	1.6	0.2	0.6	0.0	32.4	3.2		

Construction Equipment Exhaust Emissions

Equipment	Horse- Power	Hours/ Day Used	Number	CO (lb/day) ^a	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

Miles/ Day per Vehicle	Number	CO (Ib/day)ª	ROC (lb/day) ^a	NOx (lb/day) ^a	SOx (lb/day) ^a	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
10	1	0.1	0.0	0.0	0.0	0.0	0.0
10	2	0.2	0.0	0.5	0.0	0.0	0.0
60	4	1.3	0.2	0.1	0.0	0.0	0.0
		1.6	0.2	0.6	0.0	0.0	0.0
	Miles/ Day per Vehicle 10 10 60	Miles/ Day per Vehicle Number 10 1 10 2 60 4	Miles/ Day per Vehicle CO Number 10 1 0.1 10 2 0.2 60 4 1.3 1.6 1.6	Miles/ Day per Vehicle CO Number CO (lb/day) ^a ROC (lb/day) ^a 10 1 0.1 0.0 10 2 0.2 0.0 60 4 1.3 0.2 1.6 0.2 0.2 0.2	Miles/ Day per CO ROC NOx Vehicle Number (lb/day) ^a (lb/day) ^a (lb/day) ^a 10 1 0.1 0.0 0.0 10 2 0.2 0.0 0.5 60 4 1.3 0.2 0.1 10 0.4 1.6 0.2 0.6	Miles/ Day per Vehicle Loss CO ROC NOx SOx 10 1 0.1 0.0 0.0 0.0 10 2 0.2 0.0 0.5 0.0 60 4 1.3 0.2 0.1 0.0 10 0.4 1.6 0.2 0.6 0.0	Miles/ Day per Vehicle CO ROC NOx SOx PM10 (lb/day) ^a 10 1 0.1 0.0 0.0 0.0 0.0 10 2 0.2 0.0 0.5 0.0 0.0 60 4 1.3 0.2 0.1 0.0 0.0 0.0

cont.

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Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Pickup Truck	Paved	5	1	0.0	0.0
Pickup Truck	Unpaved	5	1	10.7	1.1
Heavy Duty Truck	Paved	5	2	0.0	0.0
Heavy Duty Truck	Unpaved	5	2	21.4	2.1
Worker Commuting	Paved	60	10	0.2	0.0
Worker Commuting	Unpaved	0	10	0.0	0.0
Total Vehicle Fugitive				32.4	3.2

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

Table 31 Distribution Underground Civil

Emissions Summary									
CO ROC NOx SOx PM10 PM2.									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	13.7	2.9	20.0	0.0	1.5	1.4			
Vehicle Exhaust	8.7	1.6	14.1	0.0	0.6	0.6			
Vehicle Fugitive					0.5	0.0			
Earthwork Fugitive					0.1	0.0			
Total	22.4	4.4	34.1	0.1	2.7	2.0			

Construction Equipment Exhaust Emissions									
Funitaria	Horse-	Hours/ Day	Newskaw	CO	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day)	(lb/day)	(lb/day)	(Ib/day)	(lb/day)	(lb/day)
Backhoe	79	8	2	5.7	1.2	7.8	0.0	0.7	0.6
Roller	100	8	1	3.3	0.8	5.3	0.0	0.5	0.4
Grinder	175	8	1	4.7	0.8	6.9	0.0	0.4	0.3
Total Equipment Exhaust				13.7	2.9	20.0	0.0	1.5	1.4
3									

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Dump Truck	60	4	2.0	0.5	6.1	0.0	0.3	0.2
Flatbed Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Concrete Truck	60	4	2.0	0.5	6.1	0.0	0.3	0.2
Worker Commuting	60	13	4.3	0.5	0.4	0.0	0.0	0.0
Total Vehicle Exhaust			8.7	1.6	14.1	0.0	0.6	0.6

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/		DM40	
	Road	Day per		PINITU	PIVIZ.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Dump Truck	Paved	60	4	0.1	0.0
Dump Truck	Unpaved	0	4	0.0	0.0
Flatbed Truck	Paved	60	1	0.0	0.0
Flatbed Truck	Unpaved	0	1	0.0	0.0
Concrete Truck	Paved	60	4	0.1	0.0
Concrete Truck	Unpaved	0	4	0.0	0.0
Worker Commuting	Paved	60	13	0.3	0.0
Worker Commuting	Unpaved	0	13	0.0	0.0
Total Vehicle Fugitive				0.5	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions	
---------------------------------------	--

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping ^b	CY/Day	100	0.1	0.0
Total Earthwork Fugitive			0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

^b Estimate

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Table 32 **Distribution Underground Electrical**

Emissions Summary									
	CO ROC NOx SOx PM10 PM2								
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	9.2	2.7	18.2	0.0	0.8	0.8			
Vehicle Exhaust	5.0	0.6	0.9	0.0	0.0	0.0			
Vehicle Fugitive					0.3	0.0			
Earthwork Fugitive					0.1	0.0			
Total	14.2	3.3	19.1	0.0	1.3	0.8			

Construction Equipment Exhaust Emissions									
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
Rodder Truck	35	8	2	4.4	1.3	4.3	0.0	0.4	0.3
Cable Dolly	9	8	1	0.5	0.1	0.6	0.0	0.0	0.0
Double Bucket Truck	250	8	1	4.3	1.2	13.2	0.0	0.4	0.4
Total Equipment Exhaust				9.2	2.7	18.2	0.0	0.8	0.8
^a Emissions [lb/day] = Emission factor [lb/	/hrl x Operating tim	o [br/dov] v Nu	Imbor						

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Rodder Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Double Bucket Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Pickup Truck	10	3	0.2	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	14	4.6	0.5	0.4	0.0	0.0	0.0
Total Vehicle Exhaust			5.0	0.6	0.9	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Rodder Truck	Paved	10	1	0.0	0.0
Rodder Truck	Unpaved	0	1	0.0	0.0
Double Bucket Truck	Paved	10	1	0.0	0.0
Double Bucket Truck	Unpaved	0	1	0.0	0.0
Pickup Truck	Paved	10	3	0.0	0.0
Pickup Truck	Unpaved	0	3	0.0	0.0
Worker Commuting	Paved	60	14	0.3	0.0
Worker Commuting	Unpaved	0	14	0.0	0.0
Total Vehicle Fugitive				0.3	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive	Particulate	Matter	Emissions
-----------------	-------------	--------	-----------

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping	CY/Day	100	0.1	0.0
Total Earthwork Fugitive			0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 33 **Distribution Underground Electrical**

Emissions Summary										
	CO	ROC	NOx	SOx	PM10	PM2.5				
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0				
Vehicle Exhaust	1.1	0.1	0.3	0.0	0.0	0.0				
Vehicle Fugitive					0.1	0.0				
Earthwork Fugitive					0.1	0.0				
Total	1.1	0.1	0.3	0.0	0.2	0.0				

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
None				0.0	0.0	0.0	0.0	0.0	0.0		
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0		

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Line Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Pickup Truck	10	1	0.1	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	3	1.0	0.1	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.1	0.1	0.3	0.0	0.0	0.0

SCE-31 cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Line Truck	Paved	10	1	0.0	0.0
Line Truck	Unpaved	0	1	0.0	0.0
Pickup Truck	Paved	10	1	0.0	0.0
Pickup Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	3	0.1	0.0
Worker Commuting	Unpaved	0	3	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping	CY/Day	100	0.1	0.0
Total Earthwork Fugitive			0.1	0.0

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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Table 34 Olsen Road Getaway Civil

Emissions Summary										
CO ROC NOX SOX PM10										
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	5.7	1.2	7.8	0.0	0.7	0.6				
Vehicle Exhaust	2.0	0.4	3.5	0.0	0.1	0.1				
Vehicle Fugitive					0.1	0.0				
Earthwork Fugitive					0.1	0.0				
Total	7.7	1.6	11.3	0.0	1.0	0.8				

Construction Equipment Exhaust Emissions

		Hours/							
	Horse-	Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
Backhoe	79	8	2	5.7	1.2	7.8	0.0	0.7	0.6
Total Equipment Exhaust				5.7	1.2	7.8	0.0	0.7	0.6

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/			D 00	NO	0.0	DMAG	
	Day per		00	RUC	NOX	SUX	PMITU	PIVIZ.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Dump Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Crew Truck	10	2	0.1	0.0	0.3	0.0	0.0	0.0
Concrete Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	3	1.0	0.1	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			2.0	0.4	3.5	0.0	0.1	0.1

SCE1-31 cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

	Poad	Miles/		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Dump Truck	Paved	60	1	0.0	0.0
Dump Truck	Unpaved	0	1	0.0	0.0
Crew Truck	Paved	10	2	0.0	0.0
Crew Truck	Unpaved	0	2	0.0	0.0
Concrete Truck	Paved	60	1	0.0	0.0
Concrete Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	3	0.1	0.0
Worker Commuting	Unpaved	0	3	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
Soil Dropping ^b	CY/Day	100	0.1	0.0
Total Earthwork Fugitive			0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

^b Estimate

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Table 35 Olsen Road Getaway Paving

Emissions Summary										
	ROC	ROC NOx		PM10	PM2.5					
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	2.4	0.9	2.1	0.0	0.2	0.2				
Vehicle Exhaust	1.8	0.3	1.8	0.0	0.1	0.1				
Vehicle Fugitive					0.1	0.0				
Earthwork Fugitive					0.0	0.0				
Total	4.2	1.2	3.9	0.0	0.4	0.3				

Construction Equipment Exhaust Emissions

	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
Paving Roller	46	8	1	2.4	0.9	2.1	0.0	0.2	0.2
Total Equipment Exhaust				2.4	0.9	2.1	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Dump Truck	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Crew Truck	10	1	0.0	0.0	0.2	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.8	0.3	1.8	0.0	0.1	0.1

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cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Dump Truck	Paved	60	1	0.0	0.0
Dump Truck	Unpaved	0	1	0.0	0.0
Crew Truck	Paved	10	1	0.0	0.0
Crew Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

Table 36 **Olsen Road Getaway Vault Delivery**

Emissions Summary									
CO ROC NOX SOX PM10 F									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	3.9	0.9	6.6	0.0	0.4	0.4			
Vehicle Exhaust	0.8	0.2	1.6	0.0	0.1	0.1			
Vehicle Fugitive					0.0	0.0			
Earthwork Fugitive					0.0	0.0			
Total	4.7	1.0	8.2	0.0	0.5	0.4			

	Construction Equipment Exhaust Emissions												
		Hours/											
	Horse-	Day		со	ROC	NOx	SOx	PM10	PM2.5				
Equipment	Power	Used	Number	(lb/day) ^a									
Crane	125	4	2	3.9	0.9	6.6	0.0	0.4	0.4				
Total Equipment Exhaust				3.9	0.9	6.6	0.0	0.4	0.4				

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Dav per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Flatbed Truck with Crane	60	1	0.5	0.1	1.5	0.0	0.1	0.1
Worker Commuting	60	1	0.3	0.0	0.0	0.0	0.0	0.0
Total Vehicle Exhaust			0.8	0.2	1.6	0.0	0.1	0.1

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road Type	Miles/ Day per Vehicle	Number	PM10 (Ib/day) ^a	PM2.5 (lb/day) ^a
Flatbed Truck with Crane	Paved	60	1	0.0	0.0
Flatbed Truck with Crane	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	1	0.0	0.0
Worker Commuting	Unpaved	0	1	0.0	0.0
Total Vehicle Fugitive				0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 37 **Olsen Road Getaway Cable Pulling**

Emissions Summary										
CO ROC NOX SOX PM10 PI										
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)				
Equipment Exhaust	2.2	0.7	2.2	0.0	0.2	0.2				
Vehicle Exhaust	2.3	0.3	0.2	0.0	0.0	0.0				
Vehicle Fugitive					0.1	0.0				
Earthwork Fugitive					0.0	0.0				
Total	4.5	0.9	2.4	0.0	0.3	0.2				

Construction Equipment Exhaust Emissions											
	Horse-	Hours/ Day		со	ROC	NOx	SOx	PM10	PM2.5		
Equipment	Power	Used	Number	(lb/day) ^a							
Rodder Truck	35	8	1	2.2	0.7	2.2	0.0	0.2	0.2		
Cable Carousel	9	8	1	0.5	0.1	0.6	0.0	0.0	0.0		
Total Equipment Exhaust				2.2	0.7	2.2	0.0	0.2	0.2		

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Worker Commuting	60	7	2.3	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.3	0.3	0.2	0.0	0.0	0.0
	D: 1	1						

Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road Type	Miles/ Day per Vehicle	Number	PM10 (lb/day) ^a	PM2.5 (lb/day) ^a
Worker Commuting	Paved	60	7	0.1	0.0
Worker Commuting	Unpaved	0	7	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0
a				

Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

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Table 38 Olsen Road Getaway Switch Installation

Emissions Summary									
CO ROC NOX SOX PM10 PM2									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0			
Vehicle Exhaust	1.5	0.2	0.4	0.0	0.0	0.0			
Vehicle Fugitive					0.1	0.0			
Earthwork Fugitive					0.0	0.0			
Total	1.5	0.2	0.4	0.0	0.1	0.0			

Construction Equipment Exhaust Emissions									
	Hours/								
Horse-	Day		со	ROC	NOx	SOx	PM10	PM2.5	
Power	Used	Number	(lb/day) ^a	(lb/day) ^a	(lb/day) ^a	(lb/day) ^a	(lb/day) ^a	(lb/day) ^a	
			0.0	0.0	0.0	0.0	0.0	0.0	
			0.0	0.0	0.0	0.0	0.0	0.0	
	Co Horse- Power	Construction Hours/ Horse- Day Power Used	Construction Equipmen Hours/ Horse- Day Power Used Number	Construction Equipment Exhaust Hours/ CO Horse- Day CO Power Used Number (lb/day) ^a 0.0 0.0	Construction Equipment Exhaust Emissions Hours/ CO ROC Horse- Day CO ROC Power Used Number (Ib/day) ^a (Ib/day) ^a 0.0 0.0 0.0 0.0	Construction Equipment Exhaust Emissions Hours/ CO ROC NOx Horse- Day CO (lb/day) ^a (lb/day) ^a Power Used Number (lb/day) ^a (lb/day) ^a 0.0 0.0 0.0 0.0	Construction Equipment Exhaust Emissions Hours/ Horse- Day CO ROC NOx SOx Power Used Number (lb/day) ^a (lb/day) ^a (lb/day) ^a (lb/day) ^a 0.0 0.0 0.0 0.0 0.0 0.0	Construction Equipment Exhaust Emissions Hours/ Horse- Day CO ROC NOx SOx PM10 Power Used Number (lb/day) ^a (lb/day) ^a (lb/day) ^a (lb/day) ^a (lb/day) ^a Image: Solution of the state of th	

Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Line Truck	10	1	0.1	0.0	0.3	0.0	0.0	0.0
Pickup Truck	10	1	0.1	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.5	0.2	0.4	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Line Truck	Paved	10	1	0.0	0.0
Line Truck	Unpaved	0	1	0.0	0.0
Pickup Truck	Paved	10	1	0.0	0.0
Pickup Truck	Unpaved	0	1	0.0	0.0
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day] Emission factors are in Table 49

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cont.

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Table 39 Olsen Road Getaway Cable Splicing

Emissions Summary									
CO ROC NOX SOX PM10 PM2.5									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	0.0	0.0	0.0	0.0	0.0	0.0			
Vehicle Exhaust	1.5	0.2	0.1	0.0	0.0	0.0			
Vehicle Fugitive					0.1	0.0			
Earthwork Fugitive					0.0	0.0			
Total	1.5	0.2	0.1	0.0	0.1	0.0			

Construction Equipment Exhaust Emissions									
		Hours/							
	Horse-	Day		со	ROC	NOx	SOx	PM10	PM2.5
Equipment	Power	Used	Number	(lb/day) ^a					
None				0.0	0.0	0.0	0.0	0.0	0.0
Total Equipment Exhaust				0.0	0.0	0.0	0.0	0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/		co	ROC	NOx	SOx	PM10	PM2 5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Van	10	2	0.1	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	4	1.3	0.2	0.1	0.0	0.0	0.0
Total Vehicle Exhaust			1.5	0.2	0.1	0.0	0.0	0.0

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^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road Type	Miles/ Day per Vehicle	Number	PM10 (lb/day) ^a	PM2.5
	Deved	40		(10, 30)	(10,00)
van	Paved	10	2	0.0	0.0
Van	Unpaved	0	2	0.0	0.0
Worker Commuting	Paved	60	4	0.1	0.0
Worker Commuting	Unpaved	0	4	0.0	0.0
Total Vehicle Fugitive				0.1	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a
None			0.0	0.0
Total Earthwork Fugitive			0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Table 40 Distribution Overhead

Emissions Summary									
CO ROC NOx SOx PM10 P									
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)			
Equipment Exhaust	2.7	0.8	2.8	0.0	0.2	0.2			
Vehicle Exhaust	2.9	0.4	0.7	0.0	0.0	0.0			
Vehicle Fugitive					0.2	0.0			
Earthwork Fugitive					0.0	0.0			
Total	5.6	1.1	3.5	0.0	0.4	0.2			

Construction Equipment Exhaust Emissions

	Harras	Hours/		00	ROC	NOv	SOx	PM10	PM2 5
Equipment	Power	Used	Number	(lb/day) ^a					
Wire Dolly	9	8	1	0.5	0.1	0.6	0.0	0.0	0.0
Wire Pulling Dolly	35	8	1	2.2	0.7	2.2	0.0	0.2	0.2
Total Equipment Exhaust				2.7	0.8	2.8	0.0	0.2	0.2

^a Emissions [lb/day] = Emission factor [lb/hr] x Operating time [hr/day] x Number

Emission factors are in Table 44

Motor Vehicle Exhaust Emissions

	Miles/							
	Day per		со	ROC	NOx	SOx	PM10	PM2.5
Vehicle Type	Vehicle	Number	(lb/day) ^a					
Line Truck	10	2	0.2	0.0	0.5	0.0	0.0	0.0
Pickup Truck	10	2	0.1	0.0	0.0	0.0	0.0	0.0
Worker Commuting	60	8	2.6	0.3	0.2	0.0	0.0	0.0
Total Vehicle Exhaust			2.9	0.4	0.7	0.0	0.0	0.0

SCE-31 cont.

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

		Miles/			
	Road	Day per		PM10	PM2.5
Vehicle Type	Туре	Vehicle	Number	(lb/day) ^a	(lb/day) ^a
Line Truck	Paved	10	2	0.0	0.0
Line Truck	Unpaved	0	2	0.0	0.0
Pickup Truck	Paved	10	2	0.0	0.0
Pickup Truck	Unpaved	0	2	0.0	0.0
Worker Commuting	Paved	60	8	0.2	0.0
Worker Commuting	Unpaved	0	8	0.0	0.0
Total Vehicle Fugitive				0.2	0.0

 Total Vehicle Fugitive
 Image: Comparison of the second secon

Emission factors are in Table 46

Fugitive Particulate Matter Emissions

	Activity	Activity	PM10	PM2.5	1
Activity	Units	Level	(lb/day) ^a	(lb/day) ^a	
None			0.0	0.0	1
Total Earthwork Fugitive			0.0	0.0	Ĺ

^a Emissions [lb/day] = Emission factor [lb/activity unit] x Activity unit [units/day]

Emission factors are in Table 49

Table 41 **Operational Emissions**

Emissions Summary							
CO ROC NOx SOx PM10 PM2.5							
Source	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	(lb/day)	
Vehicle Exhaust	0.1	0.0	0.3	0.0	0.0	0.0	
Vehicle Fugitive					0.0	0.0	
Total	0.1	0.0	0.3	0.0	0.0	0.0	

Motor Vehicle Exhaust Emissions

	Miles/ Day per		со	ROC	NOx	SOx	PM10	PM2.5	
Vehicle Type	Vehicle	Number	(lb/day) ^a	SCE-3					
Crew Truck	20	1	0.1	0.0	0.3	0.0	0.0	0.0	cont.
Total Vehicle Exhaust			0 1	0.0	03	0.0	0.0	0.0	

a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 45

Motor Vehicle Entrained Particulate Matter Emissions

Vehicle Type	Road	Miles/ Day per	Number	PM10	PM2.5
Crew Truck	Paved	20	1	0.0	0.0
Crew Truck	Unpaved	0	1	0.0	0.0
Total Vehicle Fugitive				0.0	0.0

^a Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

Emission factors are in Table 46

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

3.4-77

Table 42Construction Greenhouse Gas Emissions

Emissions Summary

	CO ₂ e
Source	(MT) ^a
Equipment Exhaust	754
Motor Vehicle Exhaust	708
TOTAL	1,462

Construction Equipment Exhaust

		Hours/				
	Horse-	Day		Days	CO ₂ e	
Equipment	Power	Used	Number	Used	(MT) ^a	
Substation Grading						
Dozer	305	4	1	90	42.4	
Loader	147	4	2	90	34.8	
Scraper	267	3	1	90	39.4	
Grader	110	3	1	90	9.2	
Backhoe	79	2	2	90	8.5	
Tamper	174	2	1	90	8.8	
Substation Civil						
Excavator	152	4	1	60	12.2	
Foundation Auger	79	6	1	15	3.1	
Foundation Auger	79	3	1	15	1.6	
Backhoe	79	3	2	60	8.5	
Skip Loader	75	3	1	60	4.8	
Skid Steer Loader	75	3	2	60	7.0	
Forklift	83	4	1	60	3.4	
17 Ton Crane	125	2	1	45	3.3	
Substation Electrical						
Scissor Lift	87	3	2	70	7.3	
Manlift	43	3	2	70	3.8	
Reach Manlift	87	4	1	70	4.8	
15 Ton Crane	125	3	1	35	3.8	
Substation Wiring						
Manlift	43	4	1	25	0.9	
Substation Transformers						
Forklift	83	6	1	30	2.6	
Crane	125	6	1	10	2.2	
Substation Asphalting						
Paving Roller	46	4	2	15	1.4	
Asphalt Paver	152	4	1	15	3.5	
Asphalt Curb Machine	35	3	1	15	0.5	
Tractor	45	3	1	15	0.6	
Substation Fencing						
Skid Steer Loader	75	8	1	10	1.6	
Substation Landscaping						
Tractor	45	6	1	15	1.2	
Subtransmission Civil Work						
Grader	250	6	1	35	16.4	
Backhoe	79	6	1	35	4.9	

SCE-31 cont.

	Tab	le 42				\wedge
Construc	tion Greenh	iouse Gas	Emissions			
Loader	147	6	2	35	20.3	
Drum Type Compactor	100	4	1	35	3.8	
Dozer	150	6	1	35	11.6	
Excavator	152	6	1	35	10.7	
Subtransmission Remove Exis	ting Wood F	Poles				
Rough Terrain Crane Truck	350	6	1	6	2.9	
Compressor Trailer	60	6	1	6	0.8	
Subtransmission Remove TSP	s					
80-Ton Rough Terrain Crane	350	6	1	4	2.0	
Compressor Trailer	60	5	1	4	0.4	
Backhoe/Front Loader	125	6	1	4	1.1	
Subtransmission Steel Pole Ha	ul		1	1		
Rough Terrain Crane	350	6	1	17	8.3	
Subtransmission Steel Pole As	sembly					
80-Ton Rough Terrain Crane	350	6	1	33	16.2	
Compressor Trailer	60	5	1	33	3.5	
Subtransmission Steel Pole Er	ection	-	_			
80-Ton Rough Terrain Crane	350	6	1	33	16.2	
Compressor Trailer	60	5	1	33	3.5	
Subtransmission TSP Footing	Installation				0.0	
Backhoe/Front Loader	125	8	1	50	18.4	SCF-3
Auger Truck	210	5	1	50	21.3	
Boom/Crane Truck	350	5	1	50	20.4	cont.
Subtransmission Conductor In	stallation	<u> </u>			2011	
Bucket Truck	250	8	4	12	37.1	
Drum Straw Line Puller	300	6	1	12	8.3	
Static Truck/Tensioner	350	2	1	12	2.8	
Boom/Crane Truck	350	6	2	12	11.8	
Subtransmission Guard Struct	ure Installat	ion	2	12	11.0	
Bucket Truck	250	4	1	4	1.5	
Compressor Trailer	60	6	1	4	0.5	
Auger Truck	210	6	1	4	2.0	
Rough Terrain Truck	125	8	1	4	0.8	
Subtransmission Guard Struct			•		0.0	
Bucket Truck	250	4	1	3	12	
Compressor Trailer	60	6	1	3	0.4	
Rough Terrain Crane	350	8	1	3	2.0	
Subtransmission Underground	Constructi	<u>on</u>	1	U	2.0	
Backhoe/Front Loader	125	6	1	28	77	
Compressor Trailer	60	1	1	20	2.4	
Concrete Saw	40	6	1	20	5.5	
Asphalt Grinder	175	6	1	20	8.1	
Crane Truck	350	Q Q	1	20	18.3	
Subtransmission Bara Constru		0		20	10.5	
Pubbor Tirod Backhoo	126	6	1	00	61	
	120	0	1	22		
	300	Õ		22	14.4	
	152	0	1	22	0./	
Para Machina with Dower Deals	100	Ö 0	1	22	1.0	
Dore wachine with Power Pack	300	ð		22	24.9	

Table 42

Subtransmission Restoration					
Grader	250	6	1	4	1.9
Backhoe/Front Loader	125	6	1	4	1.1
Drum Type Compactor	100	6	1	4	0.6
Dozer	150	6	1	4	1.3
Distribution Underground Civil					
Backhoe	79	8	2	75	28.2
Roller	100	8	1	75	16.1
Grinder	175	8	1	75	29.0
Distribution Underground Elect	rical				
Rodder Truck	35	8	2	43	8.8
Cable Dolly	9	8	1	43	1.6
Double Bucket Truck	250	8	1	43	39.7
Olsen Road Getaway Civil					
Backhoe	79	8	2	104	39.1
Olsen Road Getaway Paving					
Paving Roller	46	8	1	7	0.7
Olsen Road Getaway Vault Deliv	very				
Crane	125	4	2	9	2.6
Olsen Road Getaway Cable Pul	ling				
Rodder Truck	35	8	1	10	1.0
Cable Carousel	9	8	1	10	0.4
Distribution Overhead					
Wire Dolly	9	8	1	55	2.0
Wire Pulling Dolly	35	8	1	55	5.6
TOTAL					754.0

Table 42 **Construction Greenhouse Gas Emissions**

SCE-31 cont.

Emissions [metric tons, MT] = Emission factor [lb/hr] x Operating time [hr/day] x Number x

Days used [days] x 453.6 [g/lb] / 1,000,000 [g/MT]

Emission factors are in Table 44

Motor Vehicle Exhaust

	Miles/ Day per		Davs	CO₂e
Vehicle Type	Vehicle	Number	Used	(MT) ^a
Substation Survey				
Pickup Truck	60	2	10	0.6
Worker Commuting	60	2	10	0.5
Substation Grading				
Water Truck	10	1	90	1.7
Tool Truck	5	1	90	0.7
Pickup Truck	15	1	90	0.6
Dump Truck	40	47	90	314.6
Worker Commuting	60	15	90	30.7
Substation Civil				
Water Truck	10	1	60	1.1
Tool Truck	5	1	60	0.5
Dump Truck	10	1	60	1.1
Worker Commuting	60	10	60	13.7
Substation MEER				

•	Tab	le 42				\uparrow
Construct	ion Greenł	nouse Gas	Emissions			
Carry-all Truck	5	1	20	0.2	1	
Stake Truck	5	1	20	0.2	1	
Worker Commuting	60	4	20	1.8	1	
Substation Electrical		-			1	
Crew Truck	30	2	70	6.3	1	
Worker Commuting	60	10	70	15.9	1	
Substation Wiring					1	
Worker Commuting	60	5	25	28	1	
Substation Transformers		<u> </u>	20	2.0	1	
Crew Truck	30	2	30	27	-	
Low Bed Truck	30	1	30	17	-	
Worker Commuting	60	6	30	4.1	-	
Substation Testing	00	Ŭ	00		-	
	30	1	80	3.6	-	
Worker Commuting	60	1	80	3.6	-	
Substation Maintonanco Crow E	auinmont		00	5.0	-	
Maintonanco Truck			30	27	-	
Worker Commuting	50 60	2	30	2.7	-	
Substation Acabalting	00	2	- 30	1.4	-	
	20	2	15	1.4	-	
Stake Truck	30	2 1	15	1.4	-	SCE-3
	10	1	15	0.3	-	cont
Marker Commuting	10	2	15	0.0	-	00111.
	00	0	15	2.0	-	
Substation Fencing	10	4	10	0.0	-	
	10	1	10	0.2	-	
	5	1	10	0.0	-	
Worker Commuting	60	4	10	0.9	-	
Substation Landscaping	10		45		-	
	10	1	15	0.3	-	
Worker Commuting	60	6	15	2.0	-	
Subtransmission Line Survey					-	
Pickup Truck	10	2	4	0.0	_	
Worker Commuting	60	4	4	0.4	_	
Subtransmission Civil Work					_	
Water Truck	10	1	35	0.7	_	
1 Ton Crew Cab, 4x4	10	2	35	1.1	-	
Dump Truck	10	2	35	1.3	-	
Lowboy Truck/Trailer	62	2	35	8.1	_	
Worker Commuting	60	12	35	9.6		
Subtransmission Remove Exist	ing Wood	Poles			_	
1 Ton Crew Cab Flat Bed, 4x4	30	1	6	0.3		
Flat Bed Truck/Trailer	30	2	6	0.7	1	
Worker Commuting	60	6	6	0.8		
Subtransmission Remove TSPs						
1 Ton Crew Cab Flat Bed, 4x4	30	2	4	0.4		
Pickup Truck	30	2	4	0.1		
Dump Truck	30	1	4	0.2		
Worker Commuting	60	8	4	0.7]	
Subtransmission Steel Pole Ha	ul]	

Table 42

 $\mathbf{\Lambda}$

Construct	tion Greenł	nouse Gas	Emissions			
Pickup Truck	30	2	17	0.5	ן ן	
Flat Bed Truck/Trailer	30	1	17	0.9	-	
Worker Commuting	60	4	17	1.5	1	
Subtransmission Steel Pole As	sembly				-	
1 Ton Crew Cab Flat Bed, 4x4	30	2	33	3.0	-	
Pickup Truck	30	2	33	0.9	-	
Worker Commuting	60	8	33	6.0	-	
Subtransmission Steel Pole Fre	ection			0.0	-	
1 Ton Crew Cab Flat Bed 4x4	30	1	33	15	-	
Pickup Truck	30	1	33	0.5	-	
Worker Commuting	60	8	33	6.0	-	
Subtransmission TSP Footing I	nstallation	Ű		0.0	-	
Crew Truck	10	1	50	0.8	-	
Water Truck	10	1	50	0.9	1	
Concrete Truck	60	4	50	22.3	1	
	60	1	50	5.6	-	
Worker Commuting	60	7	50	8.0	-	
Subtransmission Conductor In	stallation	'		0.0	-	
1 Ton Crew Cab Flat Red Av4	10	2	12	0.4	-	
Wire Truck & Trailor	20	2	12	0.4	-	
		2 1	12	1.3	-	sc
Dump Truck Worker Commuting	60	20	12	1.3	-	30
worker Commuting		20	12	5.5	-	cor
Tan Crow Cob Flot Dod Av4			4	0.1	-	
Dialuura Trusk	10	1	4	0.1	-	
	10	1	4	0.0	-	
Bucket I ruck	10	1	4	0.1	-	
	10	1	4	0.1	-	
	60	6	4	0.5	-	
Subtransmission Guard Structi					-	
1 Ion Crew Cab Flat Bed, 4x4	10	1	3	0.0	-	
	10	1	3	0.0	-	
Bucket Iruck	10	1	3	0.0	-	
Extendable Flatbed Pole Truck	10	2	3	0.1	-	
Worker Commuting	60	6	3	0.4	4	
Subtransmission Underground	Constructi	on			-	
1 Ion Flat Bed Truck	60	1	28	3.1	-	
Dump Truck	60	2	28	6.2	4	
Worker Commuting	60	6	28	3.8	_	
Subtransmission Bore Constru	ction				_	
Concrete Truck	60	2	22	4.9	_	
Dump Truck	60	1	22	2.5		
Worker Commuting	60	8	22	4.0		
Subtransmission Restoration						
1 Ton Crew Cab, 4x4	10	1	4	0.1		
Water Truck	10	1	4	0.1]	
Lowboy Truck/Trailer	60	1	4	0.4]	
Worker Commuting	60	7	4	0.6]	
Fiber Optic Installation					1	
Pickup Truck	10	1	10	0.0	1	

Table 42
	Tab	le 42			\wedge	
Construct	ion Greenh	iouse Gas	Emissions			
Heavy Duty Truck	10	2	10	0.4	1 I	
Worker Commuting	60	4	10	0.1		
Distribution Underground Civil	00		10	0.0		
Dump Truck	60	4	75	33.5	-	
Elathed Truck	60	1	75	8.4	-	
Concrete Truck	60	4	75	33.5	-	
Worker Commuting	60	13	75	22.2	-	
Distribution Underground Elect	rical	10	10		-	
Rodder Truck	10	1	43	0.8	-	
Double Bucket Truck	10	1	43	0.8	-	
Pickup Truck	10	3	43	0.0	-	
Worker Commuting	60	14	43	13.7	-	
Distribution Underground Elect	rical	14	43	15.7		
		1	2	0.0		
	10	1	2	0.0	-	
Worker Commuting	60	3	2	0.0		
Olson Road Gotaway Civil	00	5	2	0.1		
	60	1	104	11.6		
	10	2	104	2.1	s	CE1-3
Concrete Truck	60	2 1	104	3.1	-	
Worker Commuting	60	2	104	7.1		ont.
Vorker Communing	00	3	104	7.1		
Dump Truck	60	1	7	0.0		
	00 10	1	7	0.0	-	
Verker Commuting	10	1	7	0.1	-	
Worker Commuting	60	4	/	0.6	-	
Cisen Road Getaway Vault Dell	very	1	0	1.0	-	
Halbed Truck with Crane	60	1	9	1.0	-	
Worker Commuting	60	1	9	0.2		
Olsen Road Getaway Cable Pul		7	10	1.0		
Worker Commuting	60	1	10	1.6		
Olsen Road Getaway Switch Ins	stallation		40			
	10	1	10	0.2		
	10	1	10	0.0	4	
Worker Commuting	60	4	10	0.9	4	
Ulsen Road Getaway Cable Spl		-			4	
Van	10	2	30	0.3	4	
Worker Commuting	60	4	30	2.7	4	
Distribution Overhead					4	
	10	2	55	2.0	4	
Pickup Truck	10	2	55	0.5	4	
Worker Commuting	60	8	55	10.0	4	
TOTAL				708.3		

Table 42

MI]= r [lb/mi] : cle [n ni/day] Number vehicles x Days used *453.6 [g/lb] / 1,000,000 [g/MT]

Emission factors are in Table 45

Table 43Operational Greenhouse Gas Emissions

Annual Emissions Summary

	CO ₂ e
Source	(MT) ^a
SF ₆ Leakage	15.8
Motor Vehicle Exhaust	1.4
TOTAL	17.2

SF₆ Leakage

Item	Value	Units
SF ₆ per Breaker	30	pounds
No. Breakers	5	
Total SF ₆	150	pounds
Annual Leakage Rate	1	percent/year
Annual Emissions	1.5	pounds/year
Global Warming Potential ^a	23,200	
CO ₂ e Emissions ^b	15.8	metric tons

^a Based on Table C.1 from California Climate Action Registry General Reporting Protocol, Version 3.0,

April 2008.

http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf

^b CO₂e emissions [metric tons] = SF₆ emissions [lb] x

Global warming potential [lb CO_2e /lb SF_6] x 453.6 [g/lb] / 1,000,000 [g/MT]

Motor Vehicle Exhaust

Vehicle Type	Miles/ Day per Vehicle	Number	Trips/ Year	CO ₂ e (MT) ^a
Crew Truck	20	1	48	1.4
TOTAL				1.4

^a Emissions [metric tons, MT] = Emission factor [lb/mi] x Distance per vehicle [mi/day] x

Number vehicles x Years used x 4 [visits/month] x 12 [months/yr] x 453.6 [g/lb] / 1,000,000 [g/MT] Emission factors are in Table 45

		2012 C	onstruction Equipment Exhaus	t Emissior	n Factors						- 1
		Horse-	ARB Off-Road Model	CO	ROC	NOx	SOx	PM10	PM2.5	CO ₂ e	
Equipment Type	Fuel	power	Category	(lb/hr) ^a	(lb/hr) ^b	(lb/hr) ^a					
15 Ton Crane	Diesel	125	Cranes	0.483	0.109	0.825	0.001	0.048	0.044	80.5	
7 Ton Crane	Diesel	125	Cranes	0.483	0.109	0.825	0.001	0.048	0.044	80.5	
30-Ton Rough Terrain Crane	Diesel	350	Cranes	0.569	0.163	1.531	0.002	0.057	0.052	180.2	
Asphalt Curb Machine	Diesel	35	Paving Equipment	0.312	0.124	0.259	0.000	0.028	0.026	24.1	
Asphalt Grinder	Diesel	175	Other Construction Equipment	0.587	0.101	0.859	0.001	0.047	0.043	106.6	
Asphalt Paver	Diesel	152	Pavers	0.783	0.186	1.448	0.001	0.082	0.075	128.5	
Auger Truck	Diesel	210	Bore/Drill Rigs	0.343	0.084	0.871	0.002	0.027	0.025	188.1	
Backhoe	Diesel	79	Tractors/Loaders/Backhoes	0.355	0.076	0.491	0.001	0.043	0.040	51.8	
Backhoe/Front Loader	Diesel	125	Tractors/Loaders/Backhoes	0.586	0.106	0.829	0.001	0.048	0.044	101.5	
Boom/Crane Truck	Diesel	350	Cranes	0.569	0.163	1.531	0.002	0.057	0.052	180.2	
Bore Machine with Power Pack	Diesel	300	Bore/Drill Rigs	0.552	0.135	1.314	0.003	0.044	0.040	311.3	
Bucket Truck	Diesel	250	Aerial Lifts	0.492	0.128	1.662	0.002	0.049	0.045	212.9	
Cable Carousel	Diesel	9	Other Construction Equipment	0.062	0.012	0.074	0.000	0.003	0.003	10.1	
Cable Dolly	Diesel	9	Other Construction Equipment	0.062	0.012	0.074	0.000	0.003	0.003	10.1	
Compressor Trailer	Diesel	60	Air Compressors	0.329	0.090	0.537	0.001	0.050	0.046	47.1	
Concrete Saw	Diesel	40	Light Commercial Equipment	0.448	0.104	0.726	0.001	0.055	0.051	71.6	
Crane	Diesel	125	Cranes	0.483	0.109	0.825	0.001	0.048	0.044	80.5	
Crane Truck	Diesel	350	Cranes	0.569	0.163	1.531	0.002	0.057	0.052	180.2	
Double Bucket Truck	Diesel	250	Other Construction Equipment	0.542	0.152	1.656	0.002	0.054	0.050	254.3	
Dozer	Diesel	150	Crawler Tractors	0.748	0.176	1.323	0.001	0.076	0.070	121.4	
Dozer	Diesel	305	Crawler Tractors	1.021	0.266	2.389	0.003	0.094	0.087	259.5	
Drum Straw Line Puller	Diesel	300	Other Construction Equipment	0.542	0.152	1.656	0.002	0.054	0.050	254.3	
Drum Type Compactor	Diesel	100	Rollers	0.409	0.105	0.661	0.001	0.057	0.053	59.1	
Excavator	Diesel	152	Excavators	0.667	0.129	0.961	0.001	0.057	0.052	112.4	
Forklift	Diesel	83	Forklifts	0.220	0.050	0.304	0.000	0.028	0.026	31.3	
Foundation Auger	Diesel	79	Bore/Drill Rigs	0.472	0.051	0.502	0.001	0.033	0.030	77.1	
Grader	Diesel	110	Graders	0.535	0.135	0.822	0.001	0.074	0.068	75.2	
Grader	Diesel	250	Graders	0.450	0.157	1.533	0.002	0.055	0.050	172.3	
Grinder	Diesel	175	Other Construction Equipment	0.587	0.101	0.859	0.001	0.047	0.043	106.6	
Loader	Diesel	147	Rubber Tired Loaders	0.628	0.131	1.013	0.001	0.058	0.054	106.5	
Manlift	Diesel	43	Aerial Lifts	0.182	0.065	0.192	0.000	0.017	0.016	19.7	
Paving Roller	Diesel	46	Rollers	0.299	0.110	0.268	0.000	0.026	0.024	26.2	
Reach Manlift	Diesel	87	Aerial Lifts	0.245	0.061	0.403	0.000	0.033	0.030	38.2	
Rodder Truck	Diesel	35	Other Construction Equipment	0.274	0.084	0.271	0.000	0.023	0.021	28.1	
Roller	Diesel	100	Rollers	0.409	0.105	0.661	0.001	0.057	0.053	59.1	
Rough Terrain Crane	Diesel	350	Cranes	0.569	0.163	1.531	0.002	0.057	0.052	180.2	
Rough Terrain Crane Truck	Diesel	350	Cranes	0.569	0.163	1.531	0.002	0.057	0.052	180.2	
Rough Terrain Truck	Diesel	125	Forklifts	0.331	0.063	0.470	0.001	0.028	0.026	56.1	
Rubber Tired Backhoe	Diesel	126	Tractors/Loaders/Backhoes	0.586	0.106	0.829	0.001	0.048	0.044	101.5	
Scissor Lift	Diesel	87	Aerial Lifts	0.245	0.061	0.403	0.000	0.033	0.030	38.2	
Scraper	Diesel	267	Scrapers	1.299	0.333	3.013	0.003	0.119	0.109	321.8	
Skid Steer Loader	Diesel	75	Skid Steer Loaders	0.277	0.048	0.353	0.001	0.029	0.026	42.8	
Skip Loader	Diesel	75	Rubber Tired Loaders	0.418	0.104	0.640	0.001	0.058	0.053	59.1	
Static Truck/Tensioner	Diesel	350	Other Construction Equipment	0.542	0.152	1.656	0.002	0.054	0.050	254.3	
Tamper	Diesel	174	Rollers	0.621	0.132	1.072	0.001	0.059	0.054	108.3	
Tractor	Diesel	45	Tractors/Loaders/Backhoes	0.330	0.100	0.303	0.000	0.027	0.025	30.5	
Welder	Diesel	150	Welders	0.548	0.119	0.975	0.001	0.054	0.049	98.3	
Nire Dolly	Diesel	9	Other Construction Equipment	0.062	0.012	0.074	0.000	0.003	0.003	10.1	
Nire Pulling Dolly	Diesel	35	Other Construction Equipment	0.274	0.084	0.271	0.000	0.023	0.021	28.1	

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^b Diesel PM2.5 emission factor [lb/hr] = PM10 emission factor [lb/hr] x PM2.5 fraction of PM10

PM2.5 Fraction of PM10 in Diesel Engine Exhaust = 0.920

From Appendix A, Final-Methodology to Calculate Particulate Matter (PM) 2.5

and PM 2.5 Significance Thresholds, SCAQMD, October 2006,

http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html

				Table 45							\uparrow
		2012 N	lotor Vehic	cle Exhaust	t Emission	Factors					,
					Emi	ssion Fact	ors		_		
						Exh.	Fug.	Exh.	Fug.		
	Vehicle	CO	voc	NOx	SOx	PM10	PM10	PM2.5	PM2.5		
Vehicle Type	Class	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lb/mile)	11
1 Ton Crew Cab Flat Bed, 4x4	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279	
1 Ton Crew Cab, 4x4	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279	
1 Ton Flat Bed Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	
Bucket Truck	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279	
Carry-all Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	
Concrete Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	
Crew Truck	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279]
Crew Truck (gasoline)	MHD-CAT	0.0659	0.0056	0.0106	0.0000	0.0000	0.0001	0.0000	0.0000	1.4743	11
Double Bucket Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Dump Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Extendable Flatbed Pole Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	S0
-lat Bed Truck/Trailer	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	co
-latbed Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
latbed Truck with Crane	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Heavy Duty Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
_ine Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
_ow Bed Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Lowboy Truck/Trailer	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Maintenance Truck	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279	11
Pickup Truck	LDT1-CAT	0.0067	0.0008	0.0006	0.0000	0.0000	0.0000	0.0000	0.0000	1.0435	11
Rodder Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Stake Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Fool Truck	MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0001	0.0003	0.0000	3.3279	11
/an	LDT1-CAT	0.0067	0.0008	0.0006	0.0000	0.0000	0.0000	0.0000	0.0000	1.0435	11
Nater Truck	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Nire Truck & Trailer	HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0010	0.0000	4.0989	11
Worker Commuting	LDA-CAT	0.0055	0.0006	0.0005	0.0000	0.0000	0.0000	0.0000	0.0000	0.8365	11

a From Table 48

	Та	ble 46				/	↑
Motor Vehicle	Entrained	Road Dust	Emission F	actors		_	
		Silt Loading (sL, g/m2) or	Average	PM10	PM2.5		
		Silt	Weight	Emission	Emission		
		Content	(W)	Factor	Factor		
Vehicle Type	Surface	(s, %) ^a	(tons) ^b	(Ib/VMT) ^c	(Ib/VMT) ^c		
1 Ton Crew Cab Flat Bed, 4x4	Paved	0.035	2.4	3.56E-04	0.00E+00		
1 Ton Crew Cab Flat Bed, 4x4	Unpaved	7.5	17	2.14E+00	2.14E-01		
1 Ton Crew Cab, 4x4	Paved	0.035	2.4	3.56E-04	0.00E+00		
1 Ton Crew Cab, 4x4	Unpaved	7.5	17	2.14E+00	2.14E-01		
1 Ton Flat Bed Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
1 Ton Flat Bed Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Bucket Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Bucket Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Carry-all Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Carry-all Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Concrete Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Concrete Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Crew Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Crew Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Double Bucket Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		SCE-31
Double Bucket Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		cont.
Dump Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Dump Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Extendable Flatbed Pole Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Extendable Flatbed Pole Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Flat Bed Truck/Trailer	Paved	0.035	2.4	3.56E-04	0.00E+00		
Flat Bed Truck/Trailer	Unpaved	7.5	17	2.14E+00	2.14E-01		
	Paved	0.035	2.4	3.56E-04	0.00E+00		
Flatbed Iruck	Unpaved	7.5	1/	2.14E+00	2.14E-01		
Flatbed Truck with Crane	Paved	0.035	2.4	3.56E-04	0.00E+00		
Flatbed Truck with Crane	Unpaved	7.5	1/	2.14E+00	2.14E-01		
Heavy Duty Truck	Paved	0.035	2.4	3.56E-04	0.00E+00		
Heavy Duty Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
	Paved	0.035	2.4	3.56E-04	0.00E+00		
	Unpaved	7.5	17	2.14E+00	2.14E-01		
	Paveo	0.035	2.4	3.56E-04	0.00E+00		
Low Bed Truck	Unpaved	7.5	17	2.14E+00	2.14E-01		
Lowboy Truck/Trailer	Paveo	0.035	2.4 17	3.56E-04	0.00E+00		
Lowboy Truck/Trailer	Unpaved	7.5	17	2.14E+00	2.14E-01		
	Paveu	0.035	2.4	3.30E-04	0.00E+00		
	Unpaved	7.5	17	2.14E+00	2.14E-01		
	Faveu	0.035	2.4 17	3.00E-04			
Poddor Truck	Daved	0.025	2.4	2.140	2.14E-01		
Rodder Truck	Linnovod	7.5	2.4 17	2.30⊑-04			
Stake Truck	Daved	0.025	24	2.140			
Stake Truck		7.5	2. 4 17	2.30L-04	2 14⊑_01	1	
	Paved	0.035	21	2.14L+00			
	Taveu	0.000	۲.4	J.JUL-04	0.00L+00		1

Tool Truck	Uppayod	7.5	17	2 14 5 + 00	2 14 5 01	/	<u>N</u>
Tractor	Bayed	1.5	24	2.142+00	2.142-01		
Tractor	Faveu	0.035	2.4	2 14 5+00	2 1/E 01		
Van	Bayed	1.5	24	2.142+00	2.142-01		
Van	Faveu	0.035	2.4	2 14 5+00	2 1/E 01		
Water Truck	Boyod	1.5	2.4	2.142+00	2.14L-01		
Water Truck	Faveu	0.035	2.4	2.14E+00	0.00L+00 2.14E_01		
Water Huck	Boyod	7.5	24	2.14E+00	2.14E-01		
	Faveu	0.035	2.4	3.30E-04	0.00E+00		
Wire Huck & Hallel	Dipaved	7.3	17	2.14E+00	2.14E-01		
Worker Commuting	Paved	0.035	2.4	3.56E-04	0.00E+00		
	Unpaved	7.5	2.4	8.89E-01	8.89E-02		
Paved road silt loading from ARB Emis	ssion Inventory	Methodology	7.9, Entrained	Paved Road Du	st (1997) for co	llector roads,	
http://www.arb.ca.gov/ei/areasrc/fullpd	f/full7-9.pdf						
Unpaved road silt content from SCAQI	MD CEQA Han	dbook, (1993)	Table A9-9-E-	1 for overburder	1		
^D Average paved on-road vehicle weight	in Ventura Cou	unty from ARB	Emission Inver	ntory Methodolo	gy 7.9, Entraine	ed Paved Road Dust (1997)	SCE-31
Unpaved worker commuting weight on	access road as	ssumed to be s	ame as paved	road weight			
Unpaved weight for other trucks is base	ed on upper lim	it of 33,000 lbs	s for medium h	eavy-duty trucks	3.		cont.
^c Equations:							
$EF(paved) = k_p (sL/2)^{0.65} (W/3)^{1.5} - C$		Ref: AP-42, S	ection 13.2.1, '	Paved Rods," N	November 2006		
EF (unpaved) = $k_u (s/12)^a (W/3)^b$		Ref: AP-42, S	ection 13.2.2, '	'Unpaved Rods	," November 20	06	
Constants:							
k _p =	0.016		(Particle size	multiplier for PM	110)		
	0.0024		(Particle size	multiplier for PM	12.5)		
C =	0.00047		(Exhaust, bral	ke wear and tire	wear adjustme	nt, PM10)	
	0.00036		(Exhaust, bral	ke wear and tire	wear adjustme	nt, PM2.5)	
k _u =	1.5		(Particle size	multiplier for PM	1)		
-	0.15		(Particle size	multiplier for PM	12.5)		
a =	0.9		for PM10	·	,		
	0.9		for PM2.5				
b =	0.45		for PM10				
	0.45		for PM2.5				
						\ \	1

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

3.4-88

			Table 47						\wedge
Diesel Off-road Equipment E	mission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeory	y and Hors	epower	
			Range ^a						
	HP R	lange		-					
Equipment Type	From	То	со	ROC	NOx	SOx	PM10	CO2e ^b	
A/C Tug Narrow Body	0	250	0.6894	0.2344	2.1952	0.0020	0.0922	1.79E+02	
A/C Tug Wide Body	0	500	1.9548	0.4005	3.7620	0.0033	0.1545	3.33E+02	
A/C unit	0	120	0.4765	0.1107	0.7713	0.0009	0.0589	7.61E+01	
A/C unit	121	250	0.3424	0.1004	1.2998	0.0018	0.0379	1.57E+02	
A/C unit	251	500	0.5524	0.1368	1.7868	0.0023	0.0539	2.37E+02	
Aerial Lifts	0	15	0.0528	0.0102	0.0642	0.0001	0.0030	8.66E+00	
Aerial Lifts	16	25	0.0516	0.0174	0.0958	0.0001	0.0055	1.10E+01	
Aerial Lifts	26	50	0.1825	0.0653	0.1916	0.0003	0.0170	1.97E+01	
Aerial Lifts	51	120	0.2451	0.0612	0.4029	0.0004	0.0326	3.82E+01	
Aerial Lifts	121	500	0.4923	0.1276	1.6618	0.0021	0.0493	2.13E+02	
Aerial Lifts	501	750	0.8900	0.2383	3.0956	0.0039	0.0906	3.85E+02	
Agricultural Mowers	0	120	0.2245	0.0548	0.3709	0.0004	0.0290	3.51E+01	SCF-31
Agricultural Tractors	0	15	0.0643	0.0123	0.0767	0.0002	0.0030	1.05E+01	cont
Agricultural Tractors	16	25	0.0831	0.0245	0.1558	0.0003	0.0068	2.02E+01	
Agricultural Tractors	26	50	0.3445	0.1258	0.3415	0.0004	0.0315	3.44E+01	
Agricultural Tractors	51	120	0.4794	0.1210	0.7917	0.0009	0.0648	7.30E+01	
Agricultural Tractors	121	175	0.6739	0.1389	1.1954	0.0014	0.0616	1.25E+02	
Agricultural Tractors	176	250	0.4048	0.1289	1.5673	0.0020	0.0477	1.78E+02	
Agricultural Tractors	251	500	0.7233	0.1900	2.3094	0.0029	0.0726	2.92E+02	
Air Compressors	0	15	0.0494	0.0129	0.0769	0.0001	0.0053	7.24E+00	
Air Compressors	16	25	0.0778	0.0286	0.1338	0.0002	0.0087	1.45E+01	
Air Compressors	26	50	0.2660	0.1020	0.2313	0.0003	0.0241	2.24E+01	
Air Compressors	51	120	0.3293	0.0901	0.5370	0.0006	0.0498	4.71E+01	
Air Compressors	121	175	0.5078	0.1145	0.9017	0.0010	0.0516	8.86E+01	
Air Compressors	176	250	0.3053	0.1074	1.2300	0.0015	0.0382	1.31E+02	
Air Compressors	251	500	0.5726	0.1720	1.9213	0.0023	0.0627	2.32E+02	
Air Compressors	501	750	0.8849	0.2699	3.0618	0.0036	0.0987	3.58E+02	
Air Compressors	751	1000	1.5611	0.4566	5.4474	0.0049	0.1599	4.87E+02	
Air Conditioner	0	175	0.7703	0.0892	0.9018	0.0016	0.0449	1.45E+02	
Air Conditioner	176	250	0.3756	0.0955	1.1699	0.0023	0.0339	2.08E+02	
Air Conditioner	251	500	0.7315	0.1812	2.0661	0.0047	0.0660	4.15E+02	
Air Start Unit	0	175	0.7813	0.1380	1.2926	0.0015	0.0624	1.52E+02	\checkmark

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

November 2011

			Table 47						\wedge	
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventur	a County b	y Equipme	nt Catgeor	y and Hors	epower		
			Range ^a							
	НР н	lange	Emission Factor (lb/hr)							
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ⁵		
Air Start Unit	176	250	0.4473	0.1282	1.6996	0.0021	0.0485	2.17E+02		
Air Start Unit	251	500	0.9263	0.2293	3.0590	0.0042	0.0910	4.33E+02		
Air Start Unit	501	750	1.3894	0.3550	4.7112	0.0064	0.1387	6.50E+02		
Aircraft Support	0	120	0.3208	0.0745	0.5193	0.0006	0.0397	5.13E+01		
Aircraft Support	121	175	0.5447	0.1022	0.9462	0.0012	0.0453	1.05E+02		
Baggage Tug	0	120	0.3746	0.1160	0.6679	0.0006	0.0608	4.91E+01		
Balers	0	50	0.2617	0.0829	0.3396	0.0005	0.0250	3.65E+01		
Balers	51	120	0.3258	0.0722	0.5389	0.0006	0.0368	5.46E+01		
Belt Loader	0	120	0.2500	0.0738	0.4348	0.0004	0.0394	3.42E+01		
Bobtail	0	120	0.5536	0.1593	0.9705	0.0009	0.0843	7.80E+01		
Bore/Drill Rigs	0	15	0.0631	0.0120	0.0753	0.0002	0.0029	1.04E+01		
Bore/Drill Rigs	16	25	0.0658	0.0194	0.1232	0.0002	0.0054	1.60E+01	SCE-3	
Bore/Drill Rigs	26	50	0.2333	0.0351	0.2765	0.0004	0.0149	3.11E+01	cont	
Bore/Drill Rigs	51	120	0.4720	0.0513	0.5022	0.0009	0.0328	7.71E+01		
Bore/Drill Rigs	121	175	0.7531	0.0750	0.7472	0.0016	0.0366	1.41E+02		
Bore/Drill Rigs	176	250	0.3432	0.0837	0.8714	0.0021	0.0268	1.88E+02		
Bore/Drill Rigs	251	500	0.5521	0.1352	1.3139	0.0031	0.0436	3.11E+02		
Bore/Drill Rigs	501	750	1.0908	0.2687	2.6332	0.0062	0.0867	6.15E+02		
Bore/Drill Rigs	751	1000	1.6763	0.4495	6.6170	0.0093	0.1700	9.28E+02		
Cargo Loader	0	120	0.4445	0.1185	0.7210	0.0007	0.0652	6.33E+01		
Cargo Tractor	0	120	0.4275	0.1124	0.6695	0.0007	0.0622	5.98E+01		
Cart	0	120	0.3821	0.0888	0.6186	0.0007	0.0472	6.11E+01		
Cart	121	175	0.5953	0.1117	1.0341	0.0013	0.0495	1.15E+02		
Cart	176	250	0.3243	0.0951	1.2311	0.0017	0.0359	1.48E+02		
Catering Truck	0	250	0.2862	0.0723	1.0379	0.0018	0.0281	1.56E+02		
Cement and Mortar Mixers	0	15	0.0386	0.0075	0.0475	0.0001	0.0023	6.33E+00		
Cement and Mortar Mixers	16	25	0.0851	0.0293	0.1547	0.0002	0.0090	1.76E+01		
Chippers/Stump Grinders	0	25	0.0829	0.0243	0.1540	0.0003	0.0062	2.02E+01		
Chippers/Stump Grinders	26	120	0.4901	0.1147	0.7741	0.0009	0.0627	7.61E+01		
Chippers/Stump Grinders	121	175	0.7029	0.1344	1.1871	0.0015	0.0607	1.32E+02		
Chippers/Stump Grinders	176	250	0.4919	0.1503	1.8466	0.0025	0.0563	2.23E+02		
Chippers/Stump Grinders	251	500	0.5810	0 1511	1 8463	0.0024	0.0584	2 47E+02		

SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

November 2011

		6	Table 47	•				
Diesel Off-road Equipment E	mission Facto	ors for 201	2 in Ventura	a County by	y Equipme	nt Catgeor	y and Hors	sepower
			Range ^ª				A	
		ange		1		actor (lb/n	r)	a a a b
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ⁵
Chippers/Stump Grinders	501	750	1.3986	0.3726	4.5642	0.0060	0.1426	5.95E+02
Chippers/Stump Grinders	751	1000	2.5190	0.6952	8.7687	0.0085	0.2507	8.47E+02
Combines	0	120	0.5747	0.1301	0.9503	0.0011	0.0669	9.50E+01
Combines	121	175	0.6221	0.1132	1.1017	0.0014	0.0488	1.25E+02
Combines	176	250	0.3628	0.1014	1.4217	0.0020	0.0380	1.76E+02
Combines	251	500	0.5164	0.1259	1.7965	0.0024	0.0498	2.41E+02
Commercial Turf Equipment	0	15	0.0589	0.0100	0.0703	0.0002	0.0028	9.67E+00
Commercial Turf Equipment	16	25	0.0596	0.0175	0.1103	0.0002	0.0042	1.45E+01
Communications	0	50	0.2574	0.0871	0.2882	0.0004	0.0237	3.02E+01
Communications	51	120	0.3774	0.0877	0.6110	0.0007	0.0467	6.03E+01
Compressor (Entertainment)	0	120	0.2424	0.0636	0.3897	0.0004	0.0352	3.50E+01
Compressor (GSE)	0	120	0.3891	0.0950	0.6003	0.0007	0.0534	5.73E+01
Compressor (GSE)	121	250	0.2638	0.0879	0.9981	0.0013	0.0315	1.17E+02
Compressor (GSE)	251	500	0.5584	0.1649	1.8141	0.0024	0.0603	2.41E+02
Compressor (GSE)	501	750	0.8250	0.2472	2.7550	0.0036	0.0906	3.56E+02
Compressor (Military)	0	50	0.3153	0.1067	0.3530	0.0005	0.0291	3.70E+01
Compressor (Military)	51	120	0.3350	0.0778	0.5422	0.0006	0.0414	5.35E+01
Compressor (Military)	121	175	0.6498	0.1219	1.1287	0.0014	0.0541	1.26E+02
Compressor (Military)	176	250	0.3671	0.1076	1.3936	0.0019	0.0406	1.68E+02
Compressor (Military)	251	500	0.6541	0.1620	2.1158	0.0028	0.0638	2.81E+02
Compressor (Railyard)	0	120	0.2257	0.0593	0.3628	0.0004	0.0328	3.26E+01
Compressors (Workover)	0	25	0.0772	0.0232	0.1323	0.0002	0.0078	1.45E+01
Compressors (Workover)	26	120	0.4981	0.1345	0.7919	0.0008	0.0744	6.94E+01
Compressors (Workover)	121	175	0.6816	0.1533	1.1640	0.0013	0.0685	1.15E+02
Compressors (Workover)	176	250	0.4032	0.1457	1.5130	0.0018	0.0507	1.62E+02
Compressors (Workover)	251	500	0.8180	0.2570	2.5511	0.0030	0.0896	3.09E+02
Compressors (Workover)	501	750	0.8359	0.2646	2.6854	0.0031	0.0931	3.16E+02
Compressors (Workover)	751	1000	1.8508	0.5488	6.3476	0.0056	0.1908	5.69E+02
Concrete/Industrial Saws	0	25	0.0678	0.0199	0.1260	0.0002	0.0050	1.65E+01
Concrete/Industrial Saws	26	50	0.3012	0.1046	0.2969	0.0004	0.0268	3.04E+01
Concrete/Industrial Saws	51	120	0.4875	0.1154	0.7618	0.0009	0.0639	7.43E+01
Concrete/Industrial Saws	121	175	0.8716	0.1684	1.4496	0.0018	0.0766	1.60E+02

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			Table 47								
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeor	y and Hors	epower			
			Range ^a								
	HP F	Range	Emission Factor (lb/hr)								
Equipment Type	From	То	со	ROC	NOx	SOx	PM10	CO2e ^b			
Crane	0	120	0.4554	0.0544	0.5712	0.0009	0.0357	7.90E+01			
Crane	121	175	0.5262	0.0506	0.6358	0.0012	0.0275	1.06E+02			
Crane	176	250	0.2728	0.0548	0.8793	0.0018	0.0233	1.61E+02			
Crane (Rail-CHE)	0	120	0.3745	0.0983	0.6019	0.0006	0.0544	5.41E+01			
Crane (Rail-CHE)	121	175	0.3574	0.0680	0.6209	0.0008	0.0303	6.85E+01			
Cranes	0	50	0.2976	0.1101	0.2476	0.0003	0.0258	2.34E+01			
Cranes	51	120	0.3647	0.0981	0.5839	0.0006	0.0533	5.03E+01			
Cranes	121	175	0.4834	0.1088	0.8252	0.0009	0.0479	8.05E+01			
Cranes	176	250	0.3100	0.1102	1.0703	0.0013	0.0388	1.12E+02			
Cranes	251	500	0.5686	0.1633	1.5313	0.0018	0.0570	1.80E+02			
Cranes	501	750	0.9567	0.2764	2.6414	0.0030	0.0973	3.03E+02			
Cranes	751	9999	3.5782	0.9902	10.9353	0.0098	0.3382	9.72E+02			
Crawler Tractors	0	50	0.3330	0.1261	0.2710	0.0003	0.0289	2.51E+01			
Crawler Tractors	51	120	0.4902	0.1373	0.8113	0.0008	0.0728	6.60E+01			
Crawler Tractors	121	175	0.7484	0.1757	1.3234	0.0014	0.0765	1.21E+02			
Crawler Tractors	176	250	0.5219	0.1852	1.7030	0.0019	0.0667	1.66E+02			
Crawler Tractors	251	500	1.0206	0.2657	2.3892	0.0025	0.0941	2.60E+02			
Crawler Tractors	501	750	1.8295	0.4783	4.3700	0.0047	0.1705	4.65E+02			
Crawler Tractors	751	1000	2.9045	0.7231	7.7542	0.0066	0.2503	6.59E+02			
Crushing/Proc. Equipment	0	50	0.5210	0.1925	0.4541	0.0006	0.0462	4.43E+01			
Crushing/Proc. Equipment	51	120	0.5824	0.1523	0.9164	0.0010	0.0851	8.34E+01			
Crushing/Proc. Equipment	121	175	0.9646	0.2086	1.6330	0.0019	0.0945	1.68E+02			
Crushing/Proc. Equipment	176	250	0.5587	0.1952	2.1878	0.0027	0.0682	2.45E+02			
Crushing/Proc. Equipment	251	500	0.8952	0.2731	2.9432	0.0037	0.0971	3.74E+02			
Crushing/Proc. Equipment	501	750	1.3894	0.4353	4.8241	0.0059	0.1557	5.89E+02			
Crushing/Proc. Equipment	751	9999	4.0383	1.2105	14.2465	0.0131	0.4200	1.31E+03			
Deicer	0	120	0.5190	0.1206	0.8401	0.0010	0.0642	8.29E+01			
Drill Rig	0	120	0.4682	0.0244	0.3985	0.0010	0.0209	8.37E+01			
Drill Rig	121	175	0.7496	0.0437	0.6165	0.0017	0.0245	1.51E+02			
Drill Rig	176	250	0.3411	0.0502	0.6120	0.0023	0.0154	2.02E+02			
Drill Rig	251	500	0.6139	0.0913	1.1129	0.0036	0.0279	3.68E+02			
Drill Rig	501	750	0.9498	0.1413	1.7221	0.0057	0.0432	5.69E+02			

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			Table 47						Λ
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeor	y and Hors	epower	
			Range ^a					1	
	HP R	lange			Emission F	actor (lb/h	r)		
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ^b	
Drill Rig	751	1000	2.4052	0.3640	7.4766	0.0145	0.1795	1.44E+03	
Drill Rig (Mobile)	0	50	0.4827	0.1961	0.3635	0.0004	0.0423	3.14E+01	
Drill Rig (Mobile)	51	120	0.6339	0.2047	1.1578	0.0009	0.1013	7.74E+01	
Drill Rig (Mobile)	121	175	0.9703	0.2627	1.8978	0.0016	0.1109	1.41E+02	
Drill Rig (Mobile)	176	250	0.8051	0.2918	2.4206	0.0021	0.1079	1.88E+02	
Drill Rig (Mobile)	251	500	2.1177	0.4383	3.6511	0.0031	0.1578	3.12E+02	
Drill Rig (Mobile)	501	750	4.1842	0.8684	7.3155	0.0062	0.3138	6.16E+02	
Drill Rig (Mobile)	751	1000	6.7429	1.3572	12.8914	0.0093	0.4738	9.30E+02	
Dumpers/Tenders	0	25	0.0324	0.0100	0.0613	0.0001	0.0031	7.64E+00	
Excavators	0	25	0.0676	0.0198	0.1252	0.0002	0.0048	1.65E+01	
Excavators	26	50	0.2931	0.0912	0.2566	0.0003	0.0236	2.52E+01	
Excavators	51	120	0.5215	0.1182	0.7294	0.0009	0.0657	7.38E+01	6
Excavators	121	175	0.6672	0.1287	0.9605	0.0013	0.0568	1.12E+02	
Excavators	176	250	0.3627	0.1300	1.2428	0.0018	0.0415	1.59E+02	
Excavators	251	500	0.5488	0.1803	1.6098	0.0023	0.0574	2.34E+02	
Excavators	501	750	0.9096	0.3008	2.7500	0.0039	0.0967	3.88E+02	
Forklift	0	175	0.3259	0.0653	0.5385	0.0007	0.0298	5.86E+01	
Forklifts	0	50	0.1693	0.0521	0.1490	0.0002	0.0138	1.48E+01	
Forklifts	51	120	0.2200	0.0496	0.3041	0.0004	0.0281	3.13E+01	
Forklifts	121	175	0.3308	0.0630	0.4701	0.0006	0.0281	5.61E+01	
Forklifts	176	250	0.1639	0.0599	0.5932	0.0009	0.0188	7.72E+01	
Forklifts	251	500	0.2241	0.0812	0.7316	0.0011	0.0254	1.11E+02	
Fuel Truck	0	250	0.1302	0.0414	0.4923	0.0007	0.0152	5.92E+01	
Generator	0	120	0.5912	0.1509	0.8934	0.0009	0.0838	8.24E+01	
Generator	121	175	0.9227	0.1998	1.4841	0.0017	0.0887	1.55E+02	
Generator	176	250	0.5313	0.1964	1.9777	0.0025	0.0653	2.24E+02	
Generator	251	500	0.8534	0.2896	2.7450	0.0040	0.0961	3.55E+02	
Generator	501	750	1.3777	0.4709	4.5582	0.0064	0.1578	5.74E+02	
Generator (Drilling)	0	50	0.3135	0.1169	0.2625	0.0003	0.0276	2.50E+01	
Generator (Drilling)	51	120	0.5414	0.1462	0.8608	0.0009	0.0809	7.55E+01	
Generator (Drilling)	121	175	0.6058	0.1362	1.0347	0.0012	0.0609	1.02E+02	
Generator (Drilling)	176	250	0.3601	0.1301	1.3511	0.0016	0.0453	1.45E+02	

			Table 47					
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventur	a County b	y Equipme	nt Catgeor	y and Hors	sepower
			Range ^a					
	HP F	Range		-	Emission F	actor (lb/h	r)	
Equipment Type	From	То	со	ROC	NOx	SOx	PM10	CO2e ^b
Generator (Drilling)	251	500	0.7513	0.2526	2.3249	0.0027	0.0837	2.79E+02
Generator (Drilling)	501	750	0.7722	0.2444	2.4808	0.0029	0.0860	2.92E+02
Generator (Entertainment)	0	50	0.3850	0.1321	0.4204	0.0006	0.0354	4.38E+01
Generator (Entertainment)	51	120	0.5639	0.1327	0.9126	0.0010	0.0709	8.93E+01
Generator (Entertainment)	121	175	0.7797	0.1484	1.3547	0.0017	0.0660	1.50E+02
Generator (Entertainment)	176	250	0.4372	0.1302	1.6573	0.0022	0.0491	1.98E+02
Generator (Entertainment)	251	500	0.6564	0.1639	2.0999	0.0027	0.0643	2.77E+02
Generator (Entertainment)	501	750	1.2886	0.3318	4.2377	0.0055	0.1281	5.43E+02
Generator (Entertainment)	751	9999	2.8177	0.7797	9.8781	0.0097	0.2800	9.66E+02
Generator (Military)	0	50	0.2445	0.0828	0.2738	0.0004	0.0226	2.87E+01
Generator (Military)	51	120	0.3916	0.0910	0.6339	0.0007	0.0484	6.26E+01
Generator (Military)	121	175	0.5720	0.1073	0.9935	0.0012	0.0476	1.11E+02
Generator (Military)	176	250	0.3671	0.1076	1.3936	0.0019	0.0406	1.68E+02
Generator (Military)	251	500	0.6103	0.1511	1.9740	0.0026	0.0595	2.62E+02
Generator (Military)	501	750	0.9382	0.2400	3.1195	0.0040	0.0929	4.03E+02
Generator (Railyard)	0	175	0.7265	0.1383	1.2621	0.0016	0.0615	1.39E+02
Generator (Railyard)	176	9999	2.5657	0.7100	8.9947	0.0088	0.2550	8.79E+02
Generator (Workover)	0	120	0.5089	0.1374	0.8091	0.0008	0.0760	7.09E+01
Generator (Workover)	121	175	0.6459	0.1453	1.1031	0.0012	0.0649	1.09E+02
Generator (Workover)	176	250	0.3451	0.1247	1.2948	0.0016	0.0434	1.39E+02
Generator (Workover)	251	500	0.7225	0.2269	2.2532	0.0027	0.0791	2.73E+02
Generator (Workover)	501	750	0.8518	0.2696	2.7365	0.0032	0.0949	3.22E+02
Generator (Workover)	751	9999	3.3095	0.9925	11.3499	0.0100	0.3412	1.02E+03
Generator Sets	0	15	0.0697	0.0157	0.1064	0.0002	0.0062	1.02E+01
Generator Sets	16	25	0.0950	0.0276	0.1634	0.0002	0.0097	1.77E+01
Generator Sets	26	50	0.2745	0.0969	0.2968	0.0004	0.0257	3.08E+01
Generator Sets	51	120	0.4961	0.1220	0.8151	0.0009	0.0647	7.81E+01
Generator Sets	121	175	0.7412	0.1472	1.3218	0.0016	0.0649	1.42E+02
Generator Sets	176	250	0.4501	0.1381	1.8201	0.0024	0.0512	2.13E+02
Generator Sets	251	500	0.7612	0.1960	2.6078	0.0033	0.0761	3.37E+02
Generator Sets	501	750	1.2288	0.3274	4.3363	0.0055	0.1250	5.44E+02
Generator Sets	751	9999	3.0617	0.8727	10.9593	0.0105	0.3119	1.05E+03

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			Table 47							
Diesel Off-road Equipment En	nission Facto	ors for 201	2 in Ventura Bango ^a	a County b	y Equipme	nt Catgeor	y and Hors	epower		
	HP R	Range	Emission Factor (lb/hr)							
Equipment Type	From	То	со	ROC	NOx	SOx	, РМ10	CO2e ^b		
Graders	0	50	0.3362	0.1181	0.2879	0.0004	0.0285	2.77E+01		
Graders	51	120	0.5351	0.1347	0.8216	0.0009	0.0740	7.52E+01		
Graders	121	175	0.7356	0.1553	1.1921	0.0014	0.0687	1.24E+02		
Graders	176	250	0.4504	0.1573	1.5332	0.0019	0.0546	1.72E+02		
Graders	251	500	0.6632	0.1945	1.8177	0.0023	0.0670	2.30E+02		
Graders	501	750	1.4038	0.4142	3.9464	0.0049	0.1437	4.86E+02		
Ground Power Unit	0	175	0.8715	0.1732	1.3865	0.0017	0.0793	1.54E+02		
Hydrant Truck	0	175	0.8483	0.1730	1.4537	0.0017	0.0780	1.54E+02		
Hydraulic unit	0	120	0.4482	0.1041	0.7255	0.0008	0.0554	7.16E+01		
Hydro Power Units	0	15	0.0367	0.0070	0.0438	0.0001	0.0017	6.03E+00		
Hydro Power Units	16	25	0.0470	0.0139	0.0883	0.0001	0.0039	1.15E+01		
Hydro Power Units	26	50	0.2502	0.0954	0.2190	0.0003	0.0225	2.12E+01		
Hydro Power Units	51	120	0.2939	0.0790	0.4827	0.0005	0.0432	4.22E+01		
Lav Truck	0	175	0.3085	0.0659	0.5008	0.0006	0.0296	5.26E+01		
Lawn & Garden Tractors	0	15	0.0567	0.0099	0.0698	0.0001	0.0035	9.30E+00		
Lawn & Garden Tractors	16	25	0.0589	0.0174	0.1112	0.0002	0.0052	1.43E+01		
Leaf Blowers/Vacuums	0	15	0.0184	0.0032	0.0223	0.0000	0.0010	3.01E+00		
Leaf Blowers/Vacuums	16	120	0.2892	0.0599	0.4573	0.0006	0.0316	4.87E+01		
Leaf Blowers/Vacuums	121	250	0.2018	0.0532	0.7664	0.0011	0.0204	1.00E+02		
Lift	0	120	0.4895	0.1191	0.7556	0.0008	0.0668	7.23E+01		
Lift (Drilling)	0	120	0.5955	0.1608	0.9469	0.0010	0.0890	8.30E+01		
Lift (Drilling)	121	175	0.6571	0.1478	1.1222	0.0012	0.0661	1.11E+02		
Lift (Drilling)	176	250	0.4220	0.1524	1.5833	0.0019	0.0530	1.69E+02		
Lift (Drilling)	251	500	0.7623	0.2394	2.3773	0.0028	0.0835	2.88E+02		
Lift (Drilling)	501	750	0.7603	0.2406	2.4424	0.0028	0.0847	2.88E+02		
Lift (Military)	0	120	0.4482	0.1041	0.7255	0.0008	0.0554	7.16E+01		
_ight	0	50	0.3217	0.1089	0.3603	0.0005	0.0297	3.78E+01		
Materials Handling (Rail-CHE)	0	120	0.4110	0.1079	0.6607	0.0007	0.0597	5.93E+01		
Visc Portable Equipment	0	120	0.4509	0.1109	0.7292	0.0008	0.0601	6.90E+01		
Visc Portable Equipment	121	175	0.5116	0.1025	0.8894	0.0011	0.0460	9.49E+01		
Misc Portable Equipment	176	250	0.3651	0.1146	1.3774	0.0018	0.0429	1.59E+02		
Misc Portable Equipment	251	500	0.7412	0.1928	2.3105	0.0029	0.0743	2.96E+02		

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			Table 47					
Diesel Off-road Equipment Emis	sion Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeor	y and Hors	epower
			Range ^a					
	HP F	Range			Emission F	actor (lb/h	r)	
Equipment Type	From	То	со	ROC	NOx	SOx	PM10	CO2e ^b
Misc Portable Equipment	501	750	1.0539	0.2808	3.3776	0.0042	0.1073	4.22E+02
Misc Portable Equipment	751	1000	1.7242	0.4716	5.8966	0.0056	0.1690	5.62E+02
Off-Highway Tractors	0	120	0.7262	0.2222	1.2953	0.0011	0.1142	9.41E+01
Off-Highway Tractors	121	175	0.8396	0.2133	1.6071	0.0015	0.0922	1.31E+02
Off-Highway Tractors	176	250	0.4891	0.1716	1.5268	0.0015	0.0644	1.31E+02
Off-Highway Tractors	251	750	3.0990	0.6818	6.1319	0.0057	0.2517	5.69E+02
Off-Highway Tractors	751	1000	4.8312	1.0255	10.5027	0.0082	0.3623	8.16E+02
Off-Highway Trucks	0	175	0.7587	0.1532	1.1063	0.0014	0.0665	1.25E+02
Off-Highway Trucks	176	250	0.3941	0.1468	1.3502	0.0019	0.0460	1.67E+02
Off-Highway Trucks	251	500	0.6655	0.2261	1.9447	0.0027	0.0705	2.73E+02
Off-Highway Trucks	501	750	1.0794	0.3690	3.2494	0.0044	0.1162	4.42E+02
Off-Highway Trucks	751	1000	1.7869	0.5786	6.3920	0.0063	0.1931	6.25E+02
Other Agricultural Equipment	0	15	0.0468	0.0090	0.0562	0.0001	0.0024	7.68E+00
Other Agricultural Equipment	16	25	0.0633	0.0206	0.1189	0.0002	0.0065	1.41E+01
Other Agricultural Equipment	26	50	0.2397	0.0854	0.2512	0.0003	0.0221	2.57E+01
Other Agricultural Equipment	51	120	0.3292	0.0808	0.5439	0.0006	0.0429	5.13E+01
Other Agricultural Equipment	121	175	0.4905	0.0979	0.8698	0.0010	0.0432	9.28E+01
Other Agricultural Equipment	176	250	0.2975	0.0917	1.1550	0.0015	0.0341	1.34E+02
Other Agricultural Equipment	251	500	0.4645	0.1188	1.5045	0.0019	0.0458	1.93E+02
Other Construction Equipment	0	15	0.0617	0.0118	0.0736	0.0002	0.0028	1.01E+01
Other Construction Equipment	16	25	0.0544	0.0160	0.1018	0.0002	0.0044	1.32E+01
Other Construction Equipment	26	50	0.2738	0.0841	0.2705	0.0004	0.0228	2.81E+01
Other Construction Equipment	51	120	0.5316	0.1103	0.7533	0.0009	0.0633	8.10E+01
Other Construction Equipment	121	175	0.5875	0.1007	0.8592	0.0012	0.0467	1.07E+02
Other Construction Equipment	176	500	0.5421	0.1516	1.6559	0.0025	0.0545	2.54E+02
Other General Industrial Equipmen	0	15	0.0390	0.0066	0.0466	0.0001	0.0018	6.40E+00
Other General Industrial Equipmen	16	25	0.0631	0.0185	0.1169	0.0002	0.0045	1.54E+01
Other General Industrial Equipmen	26	50	0.2869	0.1093	0.2334	0.0003	0.0255	2.19E+01
Other General Industrial Equipmen	51	120	0.4550	0.1286	0.7316	0.0007	0.0709	6.22E+01
Other General Industrial Equipmen	121	175	0.5763	0.1358	1.0051	0.0011	0.0603	9.61E+01
Other General Industrial Equipmen	176	250	0.3278	0.1242	1.3070	0.0015	0.0419	1.36E+02
Other General Industrial Equipmen	251	500	0.6755	0.2243	2.2466	0.0026	0.0762	2.66E+02

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			Table 47						/
Diesel Off-road Equipment Emis	ssion Facto	ors for 2012	2 in Ventura	a County b	y Equipme	nt Catgeor	y and Hors	epower	
			Range ^a				-		
	HP R	lange		E	Emission F	actor (lb/h	<u>r)</u>		
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ^b	
Other General Industrial Equipmen	501	750	1.1134	0.3726	3.8235	0.0044	0.1280	4.38E+02	
Other General Industrial Equipmen	751	1000	1.8366	0.5643	6.4376	0.0056	0.1955	5.60E+02	
Other GSE	0	175	0.5274	0.1296	1.0069	0.0011	0.0569	8.82E+01	
Other Lawn & Garden Equipment	0	15	0.0746	0.0127	0.0895	0.0002	0.0038	1.22E+01	
Other Lawn & Garden Equipment	16	25	0.0671	0.0197	0.1246	0.0002	0.0050	1.63E+01	
Other Material Handling Equipment	0	50	0.3969	0.1518	0.3245	0.0004	0.0354	3.06E+01	
Other Material Handling Equipment	51	120	0.4431	0.1250	0.7141	0.0007	0.0691	6.09E+01	
Other Material Handling Equipment	121	175	0.7300	0.1714	1.2769	0.0014	0.0764	1.22E+02	
Other Material Handling Equipment	176	250	0.3492	0.1312	1.3955	0.0016	0.0446	1.45E+02	
Other Material Handling Equipment	251	500	0.4864	0.1598	1.6195	0.0019	0.0547	1.92E+02	
Other Material Handling Equipment	501	9999	2.4279	0.7490	8.5092	0.0073	0.2576	7.42E+02	
Other tactical support equipment	0	50	0.3217	0.1089	0.3603	0.0005	0.0297	3.78E+01	
Other tactical support equipment	51	120	0.3727	0.0866	0.6033	0.0007	0.0461	5.96E+01	
Other tactical support equipment	121	175	0.5759	0.1080	1.0003	0.0013	0.0479	1.11E+02	
Other tactical support equipment	176	250	0.3588	0.1052	1.3623	0.0018	0.0397	1.64E+02	
Other tactical support equipment	251	500	0.4735	0.1172	1.5315	0.0020	0.0462	2.03E+02	
Other tactical support equipment	501	750	1.0978	0.2809	3.6501	0.0047	0.1087	4.71E+02	
Other Workover Equipment	0	120	0.4818	0.1301	0.7661	0.0008	0.0720	6.72E+01	
Other Workover Equipment	121	175	0.6726	0.1513	1.1488	0.0013	0.0676	1.14E+02	
Other Workover Equipment	176	250	0.4032	0.1457	1.5130	0.0018	0.0507	1.62E+02	
Other Workover Equipment	251	750	0.8200	0.2595	2.6342	0.0030	0.0913	3.10E+02	
Other Workover Equipment	751	1000	2.4098	0.7145	8.2644	0.0073	0.2485	7.40E+02	
Passenger Stand	0	120	0.4335	0.0851	0.6741	0.0009	0.0452	7.43E+01	
Pavers	0	25	0.0811	0.0255	0.1530	0.0002	0.0080	1.87E+01	
Pavers	26	50	0.3677	0.1450	0.3035	0.0004	0.0327	2.82E+01	
Pavers	51	120	0.5103	0.1466	0.8780	0.0008	0.0775	6.94E+01	
Pavers	121	175	0.7826	0.1862	1.4483	0.0014	0.0818	1.29E+02	
Pavers	176	250	0.6358	0.2180	2.0681	0.0022	0.0817	1.95E+02	
Pavers	251	500	0.9947	0.2381	2.2398	0.0023	0.0882	2.33E+02	
Paving Equipment	0	25	0.0519	0.0153	0.0973	0.0002	0.0042	1.26E+01	
Paving Equipment	26	50	0.3122	0.1238	0.2588	0.0003	0.0279	2.41E+01	
Paving Equipment	51	120	0.3993	0.1149	0.6891	0.0006	0.0609	5.47E+01	

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			Table 47						\wedge
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeor	y and Hors	epower	
			Range ^a				<u>,</u>	1	
	НР Б	Range			Emission F	actor (lb/h	r)	h	
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ⁵	
Paving Equipment	121	175	0.6109	0.1454	1.1374	0.0011	0.0639	1.01E+02	
Paving Equipment	176	250	0.3943	0.1347	1.2964	0.0014	0.0506	1.22E+02	
Plate Compactors	0	15	0.0263	0.0050	0.0314	0.0001	0.0013	4.32E+00	
Pressure Washers	0	15	0.0334	0.0075	0.0510	0.0001	0.0030	4.90E+00	
Pressure Washers	16	25	0.0385	0.0112	0.0662	0.0001	0.0039	7.16E+00	
Pressure Washers	26	50	0.1077	0.0353	0.1340	0.0002	0.0103	1.43E+01	
Pressure Washers	51	120	0.1458	0.0336	0.2400	0.0003	0.0173	2.41E+01	
Pressure Washers	121	175	0.5914	0.1109	1.0273	0.0013	0.0492	1.14E+02	
Pressure Washers	176	250	0.2493	0.0433	0.4419	0.0016	0.0117	1.44E+02	
Pump (Drilling)	0	120	0.5251	0.1418	0.8350	0.0009	0.0785	7.32E+01	
Pump (Drilling)	121	175	0.6415	0.1443	1.0955	0.0012	0.0645	1.09E+02	
Pump (Drilling)	176	250	0.4314	0.1558	1.6185	0.0019	0.0542	1.73E+02	SCE-3
Pump (Drilling)	251	500	0.7782	0.2444	2.4270	0.0033	0.0852	2.94E+02	cont
Pump (Drilling)	501	750	1.1683	0.3698	3.7531	0.0043	0.1301	4.42E+02	cont.
Pump (Drilling)	751	9999	2.5887	0.7764	8.8782	0.0078	0.2669	7.95E+02	
Pump (Military)	0	50	0.2509	0.0850	0.2810	0.0004	0.0231	2.95E+01	
Pump (Military)	51	120	0.4718	0.1096	0.7637	0.0009	0.0583	7.54E+01	
Pump (Workover)	0	120	0.5305	0.1432	0.8436	0.0009	0.0793	7.39E+01	
Pump (Workover)	121	175	0.6459	0.1453	1.1031	0.0012	0.0649	1.09E+02	
Pump (Workover)	176	250	0.3864	0.1396	1.4496	0.0017	0.0486	1.55E+02	
Pump (Workover)	251	500	0.7563	0.2376	2.3587	0.0028	0.0828	2.86E+02	
Pump (Workover)	501	9999	3.7924	1.1373	13.0062	0.0114	0.3910	1.17E+03	
Pumps	0	15	0.0507	0.0133	0.0791	0.0001	0.0054	7.44E+00	
Pumps	16	25	0.1050	0.0386	0.1806	0.0002	0.0118	1.95E+01	
Pumps	26	50	0.3243	0.1167	0.3365	0.0004	0.0301	3.45E+01	
Pumps	51	120	0.5041	0.1264	0.8279	0.0009	0.0675	7.81E+01	
Pumps	121	175	0.7431	0.1511	1.3252	0.0016	0.0670	1.40E+02	
Pumps	176	250	0.4343	0.1366	1.7523	0.0023	0.0504	2.01E+02	
Pumps	251	500	0.8028	0.2098	2.7049	0.0034	0.0808	3.45E+02	
Pumps	501	750	1.3272	0.3577	4.6066	0.0057	0.1360	5.71E+02	
Pumps	751	9999	4.0610	1.1527	14.3253	0.0136	0.4101	1.36E+03	
Rollers	0	15	0.0386	0.0074	0.0460	0.0001	0.0018	6.33F+00	

Diesel Off-road Equipment Fmi	ssion Facto	ors for 201	2 in Ventur	a Countv h	v Equipme	nt Catgeor	v and Hors	epower
			Range ^a		y Equipino	in outgoor	y and nore	oponei
	HP F	Range	Range		Emission F	actor (lb/h	r)	
Equipment Type	From	То	СО	ROC	NOx	SOx	, РМ10	CO2e ^b
Rollers	16	25	0.0549	0.0162	0.1028	0.0002	0.0045	1.34E+01
Rollers	26	50	0.2992	0.1104	0.2675	0.0003	0.0263	2.62E+01
Rollers	51	120	0.4095	0.1054	0.6614	0.0007	0.0574	5.91E+01
Rollers	121	175	0.6214	0.1319	1.0716	0.0012	0.0590	1.08E+02
Rollers	176	250	0.4079	0.1346	1.4091	0.0017	0.0498	1.53E+02
Rollers	251	500	0.6745	0.1753	1.8077	0.0021	0.0652	2.19E+02
Rough Terrain Forklifts	0	50	0.3906	0.1314	0.3452	0.0004	0.0330	3.41E+01
Rough Terrain Forklifts	51	120	0.4360	0.1037	0.6419	0.0007	0.0585	6.26E+01
Rough Terrain Forklifts	121	175	0.7262	0.1443	1.1195	0.0014	0.0651	1.25E+02
Rough Terrain Forklifts	176	250	0.3892	0.1352	1.4070	0.0019	0.0458	1.71E+02
Rough Terrain Forklifts	251	500	0.5979	0.1892	1.8561	0.0025	0.0642	2.57E+02
Rubber Tired Dozers	0	175	0.8520	0.2207	1.6290	0.0015	0.0944	1.30E+02
Rubber Tired Dozers	176	250	0.7116	0.2543	2.1966	0.0021	0.0942	1.84E+02
Rubber Tired Dozers	251	500	1.5204	0.3341	2.8795	0.0026	0.1209	2.65E+02
Rubber Tired Dozers	501	750	2.2890	0.5047	4.4036	0.0040	0.1834	3.99E+02
Rubber Tired Dozers	751	1000	3.6792	0.7815	7.7785	0.0059	0.2731	5.93E+02
Rubber Tired Loaders	0	25	0.0696	0.0204	0.1294	0.0002	0.0052	1.70E+01
Rubber Tired Loaders	26	50	0.3753	0.1314	0.3240	0.0004	0.0319	3.14E+01
Rubber Tired Loaders	51	120	0.4184	0.1044	0.6398	0.0007	0.0575	5.91E+01
Rubber Tired Loaders	121	175	0.6282	0.1311	1.0127	0.0012	0.0583	1.06E+02
Rubber Tired Loaders	176	250	0.3834	0.1329	1.3119	0.0017	0.0462	1.49E+02
Rubber Tired Loaders	251	500	0.6749	0.1959	1.8539	0.0023	0.0677	2.37E+02
Rubber Tired Loaders	501	750	1.3825	0.4039	3.8983	0.0049	0.1406	4.86E+02
Rubber Tired Loaders	751	1000	1.9573	0.5476	6.3239	0.0060	0.1907	5.94E+02
Sailboat Auxiliary Inboard Engine	0	50	0.0979	0.0652	0.2223	0.0002	0.0056	1.20E+01
Scrapers	0	120	0.7005	0.1989	1.1739	0.0011	0.1054	9.42E+01
Scrapers	121	175	0.9150	0.2170	1.6415	0.0017	0.0945	1.48E+02
Scrapers	176	250	0.6693	0.2365	2.1830	0.0024	0.0858	2.10E+02
Scrapers	251	500	1.2987	0.3330	3.0134	0.0032	0.1189	3.22E+02
Scrapers	501	750	2.2435	0.5778	5.3105	0.0056	0.2075	5.56E+02
Service Truck	0	175	0.2326	0.0437	0.3851	0.0005	0.0199	4.36E+01
Signal Boards	0	15	0.0376	0.0072	0.0449	0.0001	0.0017	6.18E+00

			Table 47					
Diesel Off-road Equipment E	Emission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeory	y and Hors	epower
			Range ^a					
	HP R	ange		<u> </u>	Emission F	actor (lb/hi	r)	-
Equipment Type	From	То	СО	ROC	NOx	SOx	PM10	CO2e ^b
Signal Boards	16	50	0.3584	0.1269	0.3561	0.0005	0.0323	3.64E+01
Signal Boards	51	120	0.5265	0.1283	0.8353	0.0009	0.0703	8.04E+01
Signal Boards	121	175	0.8362	0.1660	1.4256	0.0017	0.0749	1.55E+02
Signal Boards	176	250	0.5510	0.1745	2.1581	0.0029	0.0639	2.55E+02
Skid Steer Loaders	0	25	0.0635	0.0211	0.1188	0.0002	0.0067	1.38E+01
Skid Steer Loaders	26	50	0.2330	0.0596	0.2400	0.0003	0.0180	2.56E+01
Skid Steer Loaders	51	120	0.2767	0.0482	0.3533	0.0005	0.0286	4.28E+01
Snubbing	0	120	0.5414	0.1462	0.8608	0.0009	0.0809	7.55E+01
Sprayers	0	25	0.0654	0.0242	0.1103	0.0002	0.0073	1.19E+01
Sprayers	26	50	0.1616	0.0511	0.2106	0.0003	0.0154	2.26E+01
Sprayers	51	120	0.3403	0.0753	0.5629	0.0007	0.0383	5.71E+01
Sprayers	121	175	0.4652	0.0823	0.8236	0.0011	0.0353	9.47E+01
Sprayers	176	250	0.3153	0.0856	1.2390	0.0017	0.0321	1.56E+02
Sprayers	251	500	0.3518	0.0844	1.2492	0.0017	0.0337	1.70E+02
Start Cart	0	120	0.4718	0.1096	0.7637	0.0009	0.0583	7.54E+01
Start Cart	121	500	0.4963	0.1229	1.6053	0.0021	0.0484	2.13E+02
Surfacing Equipment	0	50	0.1440	0.0513	0.1410	0.0002	0.0128	1.42E+01
Surfacing Equipment	51	120	0.4247	0.1039	0.6889	0.0007	0.0557	6.39E+01
Surfacing Equipment	121	175	0.4741	0.0949	0.8188	0.0010	0.0422	8.59E+01
Surfacing Equipment	176	250	0.3523	0.1094	1.1982	0.0015	0.0413	1.35E+02
Surfacing Equipment	251	500	0.6806	0.1629	1.7803	0.0022	0.0621	2.21E+02
Surfacing Equipment	501	750	1.0678	0.2599	2.8565	0.0035	0.0985	3.47E+02
Swathers	0	120	0.3226	0.0719	0.5336	0.0006	0.0367	5.39E+01
Swathers	121	175	0.5110	0.0913	0.9048	0.0012	0.0392	1.04E+02
Sweeper	0	120	0.1947	0.0328	0.2728	0.0004	0.0192	3.28E+01
Sweepers/Scrubbers	0	15	0.0728	0.0124	0.0869	0.0002	0.0034	1.20E+01
Sweepers/Scrubbers	16	25	0.0807	0.0237	0.1500	0.0002	0.0060	1.96E+01
Sweepers/Scrubbers	26	50	0.3587	0.1210	0.3184	0.0004	0.0306	3.18E+01
Sweepers/Scrubbers	51	120	0.5216	0.1249	0.7591	0.0009	0.0714	7.52E+01
Sweepers/Scrubbers	121	175	0.8018	0.1590	1.2301	0.0016	0.0724	1.39E+02
Sweepers/Scrubbers	176	250	0.3447	0.1215	1.3142	0.0018	0.0406	1.62E+02
Swivel	0	120	0.5630	0.1520	0.8952	0.0009	0.0841	7.85E+01

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			Table 47							
Diesel Off-road Equipment E	mission Facto	ors for 201	2 in Ventura	a County b	y Equipme	nt Catgeory	y and Hors	epower		
			Range ^a							
	HP R	ange	Emission Factor (lb/hr)							
Equipment Type	From	То	со	ROC	NOx	SOx	PM10	CO2e ^b		
Swivel	121	175	0.5880	0.1322	1.0042	0.0011	0.0591	9.95E+01		
Swivel	176	250	0.4032	0.1457	1.5130	0.0018	0.0507	1.62E+02		
Swivel	251	500	0.6143	0.1440	2.1266	0.0029	0.0585	2.94E+02		
Test Stand	0	120	0.4340	0.1009	0.7026	0.0008	0.0537	6.94E+01		
Test Stand	121	175	0.5525	0.1036	0.9597	0.0012	0.0460	1.07E+02		
Test Stand	176	250	0.3243	0.0951	1.2311	0.0017	0.0359	1.48E+02		
Test Stand	251	500	0.6015	0.1490	1.9456	0.0025	0.0587	2.58E+02		
Tillers	0	15	0.0418	0.0072	0.0508	0.0001	0.0024	6.85E+00		
Tillers	16	250	0.4986	0.1408	1.9521	0.0027	0.0527	2.40E+02		
Tillers	251	500	0.9253	0.2267	3.1952	0.0042	0.0894	4.27E+02		
Tractors/Loaders/Backhoes	0	25	0.0661	0.0199	0.1249	0.0002	0.0061	1.59E+01		
Tractors/Loaders/Backhoes	26	50	0.3302	0.1005	0.3028	0.0004	0.0266	3.05E+01		
Tractors/Loaders/Backhoes	51	120	0.3554	0.0760	0.4906	0.0006	0.0432	5.18E+01		
Tractors/Loaders/Backhoes	121	175	0.5861	0.1057	0.8288	0.0011	0.0478	1.01E+02		
Tractors/Loaders/Backhoes	176	250	0.3752	0.1263	1.2803	0.0019	0.0415	1.72E+02		
Tractors/Loaders/Backhoes	251	500	0.7707	0.2384	2.2602	0.0039	0.0784	3.45E+02		
Tractors/Loaders/Backhoes	501	750	1.1560	0.3603	3.4958	0.0058	0.1196	5.17E+02		
Transport Refrigeration Units	0	15	0.0490	0.0087	0.0614	0.0001	0.0031	8.04E+00		
Transport Refrigeration Units	16	25	0.0563	0.0167	0.1078	0.0002	0.0050	1.37E+01		
Transport Refrigeration Units	26	50	0.2212	0.0401	0.2387	0.0003	0.0149	2.60E+01		
Trenchers	0	15	0.0516	0.0098	0.0616	0.0001	0.0024	8.48E+00		
Trenchers	16	25	0.1354	0.0397	0.2517	0.0004	0.0100	3.30E+01		
Trenchers	26	50	0.4172	0.1654	0.3533	0.0004	0.0373	3.32E+01		
Trenchers	51	120	0.4728	0.1353	0.8250	0.0008	0.0708	6.51E+01		
Trenchers	121	175	0.8686	0.2048	1.6292	0.0016	0.0900	1.44E+02		
Trenchers	176	250	0.7411	0.2481	2.3833	0.0025	0.0950	2.23E+02		
Trenchers	251	500	1.3996	0.3132	3.0192	0.0031	0.1189	3.12E+02		
Trenchers	501	750	2.6385	0.5950	5.7924	0.0059	0.2260	5.87E+02		
Vessels w/Inboard Engines	0	250	0.8849	0.5888	2.0135	0.0012	0.0511	1.08E+02		
Welder	0	50	0.2252	0.0762	0.2522	0.0003	0.0208	2.65E+01		
Welder	51	120	0.2925	0.0680	0.4735	0.0005	0.0362	4.67E+01		
Welders	0	15	0.0424	0.0111	0.0661	0.0001	0.0045	6.22E+00		

Table 47 Diesel Off-road Equipment Emission Factors for 2012 in Ventura County by Equipment Catgeory and Horsepower а

			Range						
	HP F	Range			Emission F	actor (lb/hi	r)		
Equipment Type	From	То	CO	ROC	NOx	SOx	PM10	CO2e ^b	
Welders	16	25	0.0608	0.0223	0.1046	0.0001	0.0068	1.13E+01	
Welders	26	50	0.2868	0.1082	0.2640	0.0003	0.0262	2.61E+01	
Welders	51	120	0.2691	0.0716	0.4405	0.0005	0.0391	3.96E+01	
Welders	121	175	0.5477	0.1193	0.9754	0.0011	0.0536	9.83E+01	
Welders	176	250	0.2704	0.0915	1.0883	0.0013	0.0332	1.19E+02	
Welders	251	500	0.4071	0.1161	1.3633	0.0016	0.0434	1.68E+02	
Workover Rig (Mobile)	0	50	0.4827	0.1961	0.3635	0.0004	0.0423	3.14E+01	
Workover Rig (Mobile)	51	120	0.6339	0.2047	1.1578	0.0009	0.1013	7.74E+01	
Workover Rig (Mobile)	121	175	0.9703	0.2627	1.8978	0.0016	0.1109	1.41E+02	
Workover Rig (Mobile)	176	250	0.8051	0.2918	2.4206	0.0021	0.1079	1.88E+02	
Workover Rig (Mobile)	251	500	2.1177	0.4383	3.6511	0.0031	0.1578	3.12E+02	
Workover Rig (Mobile)	501	750	4.1842	0.8684	7.3155	0.0062	0.3138	6.16E+02	
Workover Rig (Mobile)	751	1000	6.7429	1.3572	12.8914	0.0093	0.4738	9.30E+02	
a - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		C 1 C 001	4 1 1 11						

SCE-31 cont.

These are composite horsepower-based off-road emission factors for 2011 developed by running CARB's

OFFROAD2007 Model (December 15, 2006 version).

Total daily emissions from the model for each type of equipment within each horsepower range were divided by the

total daily operating hours for the equipment within each horsepower range to calculate hourly emissions from individual pieces of equipment.

^b CO₂-equivalent (CO₂e) emission factors are CO₂ emission factor plus 21 x CH₄ emission factor, based on Table C.1 from California Climate Action Registry General Reporting Protocol, Version 3.0, April 2008, http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf

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						Em	ission Factors ^a						
		POC	NO	50	DM10 Exh	DM10 Tire	DM10 Broko	PM10 Tire +	PM2.5	PM2.5	PM2.5	PM2.5 Tire + Broke	CO.
Vehicle Class	(lb/mi)	(lb/mi)	(lb/mi)	(lh/mi)	(lb/mi)	(lb/mi)	(lb/mi)	(lh/mi)	(lb/mi)	(lh/mi)	(lh/mi)	(lh/mi)	(lh/mile)
DA-NCAT	0 1888	0.0348	0.0110	0.0000	0.0001	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	1 2543
DA-CAT	0.0055	0.0006	0.0005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.8365
DA-DSL	0.0015	0.0003	0.0034	0.0000	0.0003	0.0000	0.0000	0.0000	0.0003	0.0000	0.0000	0.0000	0.8092
DT1-NCAT	0.1835	0.0240	0.0105	0.0000	0.0001	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	1.1949
DT1-CAT	0.0067	0.0008	0.0006	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.0435
DT1-DSL	0.0012	0.0002	0.0034	0.0000	0.0001	0.0000	0.0000	0.0001	0.0001	0.0000	0.0000	0.0000	0.7595
DT2-NCAT	0.1798	0.0233	0.0104	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.1993
DT2-CAT	0.0079	0.0009	0.0010	0.0000	0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.0468
DT2-DSL	0.0016	0.0004	0.0036	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.8116
MDV-NCAT	0.3418	0.0227	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.6000
MDV-CAT	0.0091	0.0010	0.0013	0.0000	0.0001	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	1.4295
MDV-DSL	0.0013	0.0000	0.0037	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.8223
HD1-NCAT	0.2980	0.0360	0.0060	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.8780
HD1-CAT	0.0145	0.0019	0.0039	0.0000	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	0.0000	1.4557
HD1-DSL	0.0016	0.0002	0.0094	0.0000	0.0001	0.0000	0.0000	0.0001	0.0001	0.0000	0.0000	0.0000	1.1484
HD2-NCAT	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
HD2-CAT	0.0128	0.0018	0.0040	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.4652
HD2-DSL	0.0018	0.0003	0.0122	0.0000	0.0001	0.0000	0.0000	0.0001	0.0001	0.0000	0.0000	0.0000	1.1714
MHD-NCAT	0.6400	0.1180	0.0120	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.4260
MHD-CAT	0.0659	0.0056	0.0106	0.0000	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	0.0000	1.4743
MHD-DSL	0.0032	0.0003	0.0162	0.0000	0.0004	0.0000	0.0000	0.0001	0.0003	0.0000	0.0000	0.0000	3.3279
HHD-CAT	0.1437	0.0097	0.0318	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.3982
HHD-DSL	0.0082	0.0020	0.0254	0.0000	0.0011	0.0001	0.0001	0.0001	0.0010	0.0000	0.0000	0.0000	4.0989
OBUS-CAT	0.0884	0.0064	0.0160	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.5904
DBUS-DSL	0.0025	0.0005	0.0140	0.0000	0.0005	0.0000	0.0000	0.0000	0.0005	0.0000	0.0000	0.0000	3.1165
SBUS-CAT	0.0760	0.0070	0.0080	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.4890
SBUS-DSL	0.0085	0.0010	0.0338	0.0000	0.0013	0.0000	0.0000	0.0000	0.0012	0.0000	0.0000	0.0000	3.6385
JBUS-CAT	0.0540	0.0047	0.0140	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.9267
JBUS-DSL	0.0087	0.0020	0.0427	0.0000	0.0007	0.0000	0.0000	0.0000	0.0006	0.0000	0.0000	0.0000	6.7520
/H-NCAT	0.2720	0.0090	0.0070	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.2720
/H-CAT	0.0161	0.0005	0.0027	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.3674
/H-DSL	0.0017	0.0002	0.0175	0.0000	0.0003	0.0000	0.0000	0.0000	0.0003	0.0000	0.0000	0.0000	3.2217
ICY-NCAT	0.1473	0.0136	0.0033	0.0000	0.0002	0.0000	0.0000	0.0000	0.0001	0.0000	0.0000	0.0000	0.3097
MCY-CAT	0.0385	0.0099	0.0025	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.4547

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SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011



SCE Presidential Substation Project- Updated Air Quality Emissions Calculations- Submitted to the CPUC In November 2011

November 2011

3.4.2 Letter SCE – Responses to Comments from SCE

- SCE-1 The CPUC has proceeded with a Final EIR, which contains the appropriate revisions contained in the SCE letter, table, and supporting documents. However, the Final EIR does not conclude that the Proposed Project is the Environmentally Superior Alternative. The Final EIR determined that the Environmentally Superior Alternative is a combination of the Alternative Substation Site B and Alternative Subtransmission Alignment 3. See Master Response 1, *Alternatives* in Section 3.1.1 for more information.
- SCE-2 The Final EIR has incorporated recommended changes to the project description and alternatives, as appropriate. See Section 3.4.3, *SCE Table* below for responses to all comments contained in the table provided by SCE as an attachment to the November 15, 2011 submittal. The Final EIR determines that the Environmentally Superior Alternative would be a combination of Alternative Substation Site B and Alternative Subtransmission Alignment 3. See Master Response 1, *Alternatives* in Section 3.1.1 for more information.
- SCE-3 The commenter asserts that the Draft EIR's conclusions on certain alternatives are flawed in that the Draft EIR incorrectly concludes that they would achieve the objectives of the Proposed Project. Note that because of additional information provided by SCE, System Alternative B has been eliminated from further consideration. See Master Response 1, *Alternatives* in Section 3.1.1 for more information and additional discussion of alternatives considered by the Draft EIR.
- SCE-4 The commenter states that the Draft EIR understates impacts associated with alternatives and overstates impacts associated with the Proposed Project. The Final EIR has incorporated most of the technical changes proposed by SCE to expand the scope of the alternatives and revaluate impacts of the Proposed Project. Changes can be found in Draft EIR Chaptert 2, Project Description, Chapter 3, Alternatives, and in each resource section in Chapter 4. The Final EIR has eliminated System Alternative B from consideration. See Section 3.4.3, SCE Table below for responses to all comments contained in the table provided by SCE. The analysis on alternatives has also been updated based on information received from the Applicant and comments contained in Section 3.4.3, SCE Table. See Master Response 1, Alternatives in Section 3.1.1 for more information. However, the Final EIR concludes that the Environmentally Superior Alternative would be a combination of the Alternative Substation Site B and Alternative Subtransmission Alignment 3, instead of the Proposed Project as urged by SCE. See Master Response 1, Alternatives in Section 3.1.1 for more information. Both the Draft EIR and the Final EIR contain an adequate and accurate analysis of environmental impacts associated with the Proposed Project and project alternatives.

SCE-5 The comment summarizes direction provided by the CEQA Guidelines on the consideration of a reasonable range of alternatives as well as factors a Lead Agency may consider when determining if an alternative is feasible. This comment is noted.

SCE-6 through SCE-21

Based on information provided by the Applicant, System Alternative B has been eliminated from further consideration. See Master Response 1, *Alternatives* in Section 3.1.1 for more information.

- SCE-22 The analysis for Alternative Substation Site B has been updated, as appropriate, pursuant to the comment table submitted by SCE. The description of activities to take place under Alternative Substation Site B has been clarified and elaborated as appropriate. See Master Response 1, *Alternatives* in Section 3.1.1 for more information. As a result, the Final EIR concludes that Alternative Substation Site B is a component of the Environmentally Superior Alternative.
- SCE-23 The evaluation of aesthetic impacts resulting from the construction of Alternative Substation Site B (Draft EIR pages 4.1-65 et seq.) considers the elevation of the site, as well as the modifications to the landscape that would impact the existing visual quality. As stated on Draft EIR page 4.1-66 "View duration of the alternative substation would be longer than the Proposed Project, because Alternative Substation Site B would be elevated, located on the hillside on the northwest corner of Madera Road and North Country Club Road. Motorists at the stoplight on that corner would be exposed to views of Alternative Substation Site B for the duration of the stoplight. Alternative Substation Site B would also be more visible to members of the community and local residents. As discussed in the *Setting*, commercial buildings and a sidewalk are located directly across the street from Alternative Substation Site B, on the south side of Madera Road. Views of Alternative Substation Site B would be open and panoramic to visitors and employees at the commercial buildings."

The comment provides new information regarding the modifications to the existing landscape that would be required during construction of Alternative Substation Site B, including (1) increased pole heights because the substation would be located on a hill, and (2) increased height of the perimeter wall to 16 feet (as opposed to the Proposed Project perimeter wall, which would be approximately 8 feet high). As a result of these comments, the following changes have been made to the Draft EIR:

Chapter 3, Alternatives and Cumulative Projects, page 3-23:

The ground surface is presently terraced upslope, from the lower parking lot and internal roads to the upper building pad and parking lot, the lower level up to the upper level elevations. It is anticipated that the remainder of the site would be graded as cut to create the required fill. The proposed grading for Alternate Substation Site B would involve creating a pad consisting of a 1.5 percent minimum to 3 percent maximum slope to accommodate positive drainage across all substation equipment. <u>An approximately 16 foot high</u> perimeter wall would be constructed at the top of the elevated grade.

Existing site drainage is directed towards a concrete swale and storm drain inlet located at the southwest corner of the site. <u>All-Most</u> existing impervious surfaces, such as asphalt pavement, roof structures, and sidewalks would be eliminated. These surfaces would be dedicated to pervious surfaces where storm water runoff could be minimized. Proposed impervious surfaces to be constructed on the site would include the typical equipment foundations, asphalt concrete driveways, the MEER, and access roads to the substation. No below ground storm drain pipes are anticipated to be necessary. The existing slope and concrete terrace drains along the north hill would remain undisturbed. Drainage from the slope may be directed in a controlled method using concrete swales toward Olsen Road and into the existing catch basin inlet. The substation footprint may accommodate this slope.

While engineering and configuration of Alternative Substation B would be different than the Proposed Project Substation because the site is smaller, substation equipment heights would be the same <u>although</u>, <u>due to the</u> <u>elevation of the site</u>, the heights of the subtransmission poles coming into the <u>site could increase and additional distribution poles may be required for the</u> <u>existing 16 kV getaways out of the substation</u>. Design of the perimeter wall and landscaping would be coordinated with the City of Simi Valley and would likely be similar to the Proposed Project, <u>although the perimeter wall</u> would be taller.

Although an increase in pole and perimeter wall heights would negatively affect the views of Alternative Substation Site B, these modifications are not sufficient to create a significant impact to visual resources. As stated in the Draft EIR, Alternative Substation Site B would replace an existing industrial facility, which includes several abandoned concrete block buildings and structures, a garage, paved parking areas, light posts, and some industrial features including chain link fence and a radio antenna. Contrary to the Proposed Project substation, which would be constructed on vacant land with no existing structures, Alternative Substation Site B would not substantially change the visual character of the site on which it would be located. With implementation of Mitigation Measure 4.1-10, impacts to scenic resources and impacts to visual quality would be less than significant (Class II).

SCE-24 As stated in the third paragraph on Draft EIR page 4.11-23, the additional equipment hours required for demolition activities associated with Alternative Substation B would likely be offset by the reduced equipment hours for cut and fill activities compared to those that would be needed for the proposed Presidential Substation site. The commenter appears to indicate that the equipment hours for grading the alternative site would be comparable to the fill and grading-related equipment hours that would be required for the Proposed Project site; however, the commenter does not provide an estimate of the graded cut and fill volume amounts that would be associated with the alternative for direct comparison to the substantial fill volume (i.e., 40,000 cubic yards of imported soil) that would be required for the proposed substation site.

The analysis in the Draft EIR considered the topography, layout, and other circumstances at the alternative site and given that the existing low-point elevation of the proposed substation site is approximately 41 vertical feet lower than the proposed finished grade, which would require 40,000 cubic yards of imported soil as fill, it was determined that earthwork at the alternative site would require less total cut and fill volume compared to the Proposed Project. Therefore, it is assumed that the fill activities associated with the proposed site would be more extensive and would require additional equipment hours compared to the grading activities that would be required at the alternative site. No revisions are necessary.

SCE-25 Per CEQA Guidelines Section 15126.6(d), sufficient information about each alternative is required to allow a meaningful evaluation, analysis, and comparison; however, CEQA allows for examination of an alternative's impacts at a lesser level of detail than the analysis required for the Proposed Project's impacts. Therefore, quantification of emissions for each alternative is not a CEQA requirement to support the comparison of alternatives. The air quality and GHG emissions impacts associated with the alternatives were assessed qualitatively by comparing the components of the Proposed Project to the various alternatives.

As discussed above under Response SCE-24, the commenter does not provide an estimate of the graded cut and fill volume amounts that would be associated with the alternative for direct comparison to the substantial fill volume (i.e., 40,000 cubic yards of imported soil) that would be required for the proposed substation site and does not provide any assumptions for comparison related to construction of the 16 foot wall or the site access road.

The analysis in the Draft EIR considered the topography, layout, and other circumstances at the alternative site and it was determined that earthwork at the alternative site would require less total cut and fill volume compared to the Proposed Project. Therefore, it is assumed that the fill activities associated with the proposed site would be more extensive and would require additional equipment hours compared to the grading activities that would be required at the alternative site. Both sites would require an access road, and although a taller wall may require additional overall hours to complete compared to the proposed substation wall, from an air quality perspective, the associated difference in daily emissions would be negligible. Although the development at the Alternative Substation Site B would require complete demolition of all existing structures associated with the previous Ventura County Sherriff's Department use, when considering the additional equipment hours that would be required under the Proposed Project related to fill activities, short-term construction

activities under Alternative Substation Site B would result in similar overall total criteria pollutant emissions compared to the construction emissions that would result for the proposed Presidential Substation. Draft EIR Table 5-2 has been updated accordingly (page 5-7, in the row for Air Quality and the column for Alternative Substation Site B with Proposed Subtransmission Alignment):

Impacts would be slightly less than <u>similar to</u> the Proposed Project, but still significant unavoidable.

Preferred No Preference

SCE-26 The analysis for Alternative Subtransmission Alignment 3 has been updated, as appropriate, pursuant to the comment table submitted by SCE in Section 3.4.2 below. The description of activities to take place under Alternative Subtransmission Alignment 3 has been clarified and elaborated as appropriate, see below. See Master Response 1, *Alternatives* in Section 3.1.1 for more information.

Chapter 3, Alternatives and Cumulative Projects, page 3-21:

Additionally, a telecommunication line would be installed on the existing wood 16 kV distribution poles. The construction of a Hilfiker retaining wall and widening of access roads identified for pole removal and installation would not be required under this alternative. Under this alternative, additional groundwork would be required compared to the Proposed Project. For the portion of the alignment that will be undergrounded (from the intersection of Read Road and Sunset Valley Road heading east), SCE would construct a large flat pad to accommodate construction vehicles, turnaround areas, crane pad areas for installing the vault, and access roads for construction and maintenance. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunications line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

Relocation of Existing 16 kV Distribution

As described for the Proposed Project, there are existing overhead 16 kV distribution lines located along the entire alignment. The following describes the relocation of existing 16 kV distribution that would be required for Alternative Subtransmission Alignment 3:

• Along Sunset Valley Road from Tierra Rejada Road south to the intersection with Read Road – and Along Read Road from approximately Moorpark Road east to the intersection with Sunset

Valley Road. Existing wooden poles carrying 16 kV distribution lines would be removed. Following installation of new poles (predominantly LWS), the 16 kV distribution line would be installed on the new poles beneath the 66 kV subtransmission line. In addition, a telecommunication line would also be installed on the same poles. Existing wooden poles carrying 16 kV distribution lines would be removed.

- Along Read Road from the intersection of Sunset Valley Road east to *Hwy 23*. The existing wood poles would remain in place and the 16 kV distribution line would not be relocated. An additional telecommunication line would be installed on the existing poles.
- *From Hwy 23 east to the Proposed Substation.* The existing wooden poles would remain in place and continue to support the 16 kV distribution line. A telecommunications line would also be installed in the duct bank as described for the Proposed Project. on the existing wood 16 kV distribution poles. It is anticipated that the new telecommunications cable would be installed on the existing wood distribution poles in the communication space.
- SCE-27 Subsequent to submitting this comment, SCE provided additional information regarding wooden distribution poles east of Sunset Valley Road, in Data Response 7 (Appendix H). The results of SCE's wind loading study determined that under Alternative Subtransmission Alignment 3, it would not be necessary to replace any of the existing 16 kV distribution poles between Sunset Valley Road and the Proposed Substation in order to support the installation of a new telecommunications line. In addition, access road widening and retaining (e.g., Hilfiker) wall construction is not anticipated for telecommunications installation.

As described in Response SCE-26, above, under Alternative Subtransmission Alignment 3 additional groundwork would be required compared to the Proposed Project. For the portion of the alignment that will be undergrounded (from the intersection of Read Road and Sunset Valley Road heading east), SCE would construct a large flat pad to accommodate construction vehicles, turnaround areas, crane pad areas for installing the vault, and access roads for construction and maintenance. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunication line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

However, even with this additional groundwork, overall construction impacts (e.g., air quality and noise impacts) from this alternative would be slightly lower compared to the Proposed Project, particularly as it would involve fewer temporary pulling/splicing

sites. Implementation of Mitigation Measure 4.1-6 would reduce visual impacts from temporary sites to less than significant (Class II).

SCE-28 Per CEQA Guidelines Section 15126.6(d), CEQA allows for examination of an alternative's impacts at a lesser level of detail than the analysis required for a proposed project's impact. Therefore, quantification of emissions for each alternative is not a CEQA requirement to support the comparison of alternatives. The air quality and GHG emissions impacts associated with the alternatives were assessed qualitatively by comparing the components of the Proposed Project to the various alternatives.

As stated on Draft EIR page 4.3-20, it is anticipated that short-term construction emissions under Alternative Subtransmission Alignment 3 could be slightly less compared to the Proposed Project because the double circuit overhead line and the relocation of the overhead distribution line east of Sunset Valley Road would not be required. In addition, the additional equipment hours required for the installation of a Hilfiker wall, additional or widening of some access roads, and potential grading of existing topography would likely be offset by the elimination of the need for the proposed overhead double circuit 66 kV line and relocation of the overhead distribution 16 kV line. On balance, construction emissions under Alternative Subtransmission Alignment 3 could be slightly less compared to the Proposed Project. No revisions are necessary.

Regarding the need to replace existing poles under the alternative for wind loading, subsequent to submittal of the commenter's letter, SCE performed a wind loading study for the existing poles that indicates the wooden poles would not need to be replaced. Therefore, Alternative Subtransmission Alignment 3 would not require replacement poles due to wind loading concerns.

- SCE-29 This comment summarized previous comments, which are responded to above. System Alternative B has been eliminated from further consideration. See Master Response 1, *Alternatives* in Final EIR Section 3.1.1 for more information. The scope of work associated with the alternatives has been elaborated; see SCE-3 and -4 above. The analysis of alternatives has been revised as appropriate.
- SCE-30 SCE provided an arborist report for the Proposed Project by BioResource Consultants, Inc. The arborist report was incorporated into the document in Section 4.4, *Biological Resources*. See Response A14-30.
- SCE-31 SCE provided revised air quality and GHG emission estimates to reflect changes recommended in the comment table. These revised emission estimates have been peer reviewed by Environmental Science Associates and it has been determined that the revised emission estimates are adequate. They have been incorporated into Draft EIR Section 4.3, *Air Quality*, and 4.6, *Greenhouse Gas Emissions*, as shown below to reflect the revised construction emission estimates.

It should be noted that SCE's revised emission estimates include the use of emissions factors for the year 2012, which represent less polluting equipment compared to the emissions factors included in the PEA emission estimates, which were for the year 2009. The CPUC concurs with the use of 2012 emissions factors because construction activities would not occur prior to 2012. All of the other general calculation methods used for the revised estimates are the same as those that were included in the Draft EIR.

Based on the revised emissions presented in SCE's Table 2, *Daily Construction Emissions by Construction Activity*, the single construction activity that would generate the most daily nitrogen oxides (NO_x) emissions is the subtransmission conductor installation. It is anticipated that conductor installation would occur during the later part of the construction period, so it is unlikely that substation grading, which would be one of the first construction activities to occur and would generate the second highest NO_x emissions, would commence concurrently with subtransmission conductor installation. For the purposes of defining the maximum day emissions, it is assumed that construction activities associated with civil work for the Presidential Substation, subtransmission line bore activities associated with the Hwy 23 undercrossing, the civil work related to the underground distribution, and the civil work for the Olsen Road Getaway would overlap in schedule with the subtransmission conductor installation work to represent the peak day construction scenario. This peak day scenario is slightly more conservative than the peak day scenario described by SCE in Table 1, Daily *Construction Emissions for Concurrent Construction Activities*.

The revised emission estimates for the peak day are approximately 15 to 35 percent less, depending on the pollutant, compared to the maximum day emissions presented in the Draft EIR. With regard to reactive organic compound (ROC) emissions, the emissions are below the significance threshold, and are therefore now considered to be less than significant. Emissions of NO_x continue to be over the significance threshold and remain significant and unavoidable.

The following revisions have been made to the Draft EIR Impact 4.3-1 discussion to reflect SCE's revised emission estimates, starting at the second paragraph on Draft EIR page 4.3-11:

As part of the CPUC's permit application process During the Draft EIR public comment period, SCE provided revised construction emissions estimates for the majority of construction activities that would be associated with the Proposed Project. It should be noted that at the time the emission estimates were prepared, the Proposed Project did not include the underground open trench subtransmission installation, the Hwy 23 undercrossing, or the underground distribution and telecommunication; therefore, SCE's emission estimates do not include emissions related to those activities. Exhaust emissions were estimated using emission factors from CARB's EMFAC2007 and Offroad2007 emissions models (see Appendix C-Draft EIR Comment SCE-31 for details associated with the Proposed Project emission estimates).

To estimate peak daily construction emissions that would be associated with construction of the Proposed Project, a reasonable worst-case scenario was developed in order to identify the types of construction activities that would overlap in schedule and would contribute to the combined total maximum daily emissions. For the purposes of this analysis, it is assumed that the construction activities associated with grading-civil work for the Presidential Substation, open trench activities for underground installation of the subtransmission line, subtransmission line steel pole framing and setting, tubular steel pole (TSP) footing and installation, and material deliveries for the subtransmission line, subtransmission line bore activities associated with the Hwy 23 undercrossing, the civil work related to the underground distribution, the overhead subtransmission line conductor installation, and the civil work for the Olsen Road Getaway would overlap in schedule, representing the peak day construction scenario. As discussed above, open trench construction emissions were not included in the SCE's emission estimates for the project; therefore, ESA has independently estimated the daily emissions that would be associated with the open trench underground subtransmission line construction activities (see Appendix C, Table 29). For consistency, ESA used the same general methods and emissions factors that SCE used for its emission estimates.

Table 4.3-3 presents the estimated peak day construction emissions that would be associated with the Proposed Project. As indicated in the table, grading the proposed Presidential Substation site the overhead subtransmission line conductor installation would be the most air polluting construction activity associated with the Proposed Project given the volume of material handling and hauling that would occur greater amount of equipment that would be required on a daily basis. However, because Substation grading the overhead subtransmission line conductor installation would start not occur at the beginning of the construction phase and would occur over a relatively short duration (i.e., approximately three to four months), it is reasonable to assume that substation grading those activities would not occur at the same time as the underground subtransmission line installation substation grading, steel pole framing and setting, or TSP footing installation activities. associated It is also assumed that with the Hwy 23 undercrossing nor-would it not occur at the same time as the installation of the underground distribution and telecommunications open trench subtransmission line installation or during the Olsen Road Getaway activities.

3.4 Southern California Edison Responses

	Peak Day Emissions (Ib/day)				
Emission Sources	ROC	NO _x	со	PM ₁₀	PM _{2.5}
Substation Grading	9.4	92.5	4 1.2	4.4	4 .1
Open Trench Subtransmission Line Installation	6.1	52.5	23.5	2.6	2.3
Steel Pole Framing and Setting	6.6	51.0	<u>25.9</u>	<u>2.8</u>	<u>2.5</u>
TSP Footing and Installation	6.2	54.5	23.0	2.7	2.4
Subtransmission Line Material Delivery	0.5	2.4	2.5	0.2	0.2
Substation Civil	<u>2.7</u>	<u>17.6</u>	<u>15.9</u>	<u>1.2</u>	<u>1.1</u>
Subtransmission Line Bore	<u>5.4</u>	<u>46.1</u>	<u>25</u>	<u>2.1</u>	<u>1.9</u>
Distribution Underground Civil	4.4	<u>34.1</u>	<u>22.4</u>	<u>2.1</u>	<u>2</u>
Subtransmission Conductor Installation	<u>8.3</u>	<u>88.7</u>	<u>34.6</u>	<u>2.9</u>	<u>2.7</u>
Olsen Road Getaway Civil	<u>1.6</u>	<u>11.3</u>	<u>7.7</u>	<u>1.0</u>	<u>0.8</u>
			116.1		
Total Maximum Daily Emissions	28.8 <u>22.4</u>	252.9 <u>197.8</u>	<u>105.6</u>	12.7 <u>9.3</u>	11.5 <u>8.5</u>
VCAPCD Thresholds	25	25			
Significant Impact?	Yes <u>No</u>	Yes	No	No	No

TABLE 4.3-3 PROPOSED PROJECT PEAK DAY CONSTRUCTION EXHAUST EMISSION ESTIMATES

NOTES: See Appendix C Draft EIR Comment SCE-31 for all assumptions and emissions factors used to estimate the peak day construction emissions for the Proposed Project. It is assumed that construction activities related to the proposed subtransmission line undercrossing of Hwy 23, and the underground distribution and telecommunication would commence after Substation grading is complete. Peak day emissions associated with the subtransmission line undercrossing of Hwy 23, and the underground distribution and telecommunication are assumed to be similar to or less than those estimated for Substation grading.

The following revisions have been made to the Impact 4.3-1 discussion and associated Mitigation Measure 4.3-1, starting at the second paragraph on Draft EIR page 4.3-12. For discussion related to the revisions to Mitigation Measure 4.3-1, see Response SCE-T-151.

Therefore, as the Lead Agency for the review of the Proposed Project, the CPUC has elected to use the VCAPCD thresholds of significance to assess the significance of short-term construction equipment exhaust emissions. As indicated in Table 4.3-3, Proposed Project construction-related NO_x and ROC emissions would be more than the significance threshold, resulting in a significant impact. Therefore, implementation of Mitigation Measure 4.3-1, which requires a 20 percent reduction in construction-related NO_x and ROC emission levels compared to the most recent CARB fleet average, shall be required.

With regard to the estimated <u>ROC</u>, CO, PM_{10} , and $PM_{2.5}$ exhaust emissions presented in Table 4.3-3, these mass emissions would not exceed any VCAPCD established significance criteria and would be dispersed throughout the study area at the proposed Presidential Substation site and along the proposed subtransmission alignments, as well as along the roads that would be used to access the Proposed Project. Therefore, <u>ROC</u>, CO, PM_{10} , and $PM_{2.5}$ exhaust emissions generated by the Proposed Project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Associated impacts for <u>ROC</u>, CO, PM_{10} , and $PM_{2.5}$ would therefore be less than significant.

Mitigation Measure 4.3-1: For off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles, SCE shall make a good faith effort to ensure achievement of a Project-wide fleet-average 20 percent NO_x and 20 percent ROC reduction compared to the most recent CARB fleet average. A Construction Equipment NO_x and ROC Reduction Plan to achieve these reductions shall be submitted to CPUC for review and approval prior to commencement of construction activities. Construction activities cannot commence until the plan has been approved. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. If SCE determines that the 20 percent NO_x reduction cannot feasibly be achieved, the Construction Equipment NO_x Reduction Plan shall include documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to necessary amounts of equipment with late model engines, engine retrofits, after treatment products, etc.

Implementation of Mitigation Measure 4.3-1 would reduce the Proposed Project-related NO_x and ROC exhaust emissions identified in Table 4.3-3 by up to 20 percent. This would reduce the maximum day NO_x and ROC emissions to approximately 202 <u>158</u> pounds and 23 pounds, respectively. Therefore, although ROC emissions would be reduced to less than significant, NO_x emissions would not be reduced to below the significance level of 25 pounds. The construction-related NO_x impact would remain significant and unavoidable.

With regard to fugitive dust, SCE's revised emissions indicate that substation civil work, subtransmission line guard structure removal, subtransmission line restoration, and the overhead subtransmission line conductor installation would represent the maximum day scenario. The following revisions have been made to the second paragraph of the Impact 4.3-2 discussion on Draft EIR page 4.3-13:

As part of the CPUC's permit application process During the Draft EIR public comment period, SCE provided construction-related fugitive dust emissions estimates for the Proposed Project. The fugitive dust emissions were estimated using methods identified by CARB, USEPA, and the South Coast Air Quality Management District (SCAQMD) (see Appendix C Draft EIR Comment SCE-31 for details associated with the Proposed Project emission estimates). To estimate peak daily fugitive dust emissions that would be associated with construction of

the Proposed Project, a reasonable worst-case scenario was developed in order to identify the types of construction activities that would overlap in schedule and would contribute to the combined total maximum daily emissions. For the purposes of this analysis, it is assumed that the construction activities associated with substation grading, open trench subtransmission line installation, subtransmission line steel pole framing and setting, TSP footing and installation, and material deliveries for the subtransmission line civil work, subtransmission line guard structure removal, subtransmission line restoration, and the overhead subtransmission line conductor installation would overlap in schedule, representing the peak daily construction scenario. The estimated peak day construction-related fugitive dust emission that would be associated with the Proposed Project is 255 187 pounds per day of PM₁₀ and 28 19 pounds per day of PM_{2.5}. The vast majority of these emissions would be associated with vehicle travel on paved and unpaved surfaces.

The following revisions have been made to the first two paragraphs of the Impact 4.7-1 discussion, starting at the second paragraph on Draft EIR page 4.7-6 to reflect SCE's revised emissions estimates:

The Proposed Project would result in both short-term construction emissions of GHG and long-term operational emissions of GHG. Construction of the Proposed Project would occur over an approximately 13 to 20 month period. Construction activities would result in exhaust emissions from vehicular traffic, as well as from construction equipment and machinery. As part of the permit application process for the Proposed Project-During the public review period for the Draft EIR, SCE provided revised GHG construction emission estimates for various construction activities that would be associated with the Proposed Project. Exhaust emissions in the form of CO₂ were estimated using emission factors from CARB's EMFAC2007 and Offroad2007 emissions models (see Appendix C-Draft EIR Comment SCE-31 for details associated with the Proposed Project construction emission estimates). SCE's CO₂e construction emissions estimate for the Proposed Project is 1,462 928 metric tons.

It should be noted that SCE's estimated emissions did not include those that would be associated with the proposed underground subtransmission alignment installation activities related to the Hwy 23 crossing or the installation of the underground distribution line and telecommunications cable. Based on the overall equipment hours that would be required to complete these activities (see Project Description Table 2-5), it is estimated that total Proposed Project construction emissions would be approximately 25 to 30 percent higher than SCE's estimate. In addition, SCE's emissions estimate includes only CO₂ emissions. Construction equipment and vehicles would also generate other GHGs, including CH₄ and N₂O. However, using methods identified by the California Climate Action Registry (CCAR, 2009), the CO₂e emissions that would account for CH_4 and N_2O would represent a less than one percent increase compared to the estimate of only CO_2 emissions. For a conservative analysis, it is assumed that the total CO_2e emissions that would be associated with construction of the Proposed Project would be approximately 30 percent higher than the CO_2 emissions estimate provided by SCE (to account for the non $-CO_2$ -GHGs as well as the undergrounding activities not included in SCE's emission estimates). Therefore, it is estimated that total construction emissions that would be associated with the Proposed Project would be approximately 1,206 metric tons CO_2e .

The following revisions have been made to the last paragraph of the Impact 4.7-1 discussion, on Draft EIR page 4.7-7 to reflect SCE's revised emissions estimates:

As indicated above, total GHG construction emissions in the form of CO_2e would be approximately <u>1,462</u> <u>1,206</u> metric tons. These emissions amortized over a 30year period equal approximately <u>49</u> 40 metric tons per year. Adding <u>49</u> 40 metric tons CO_2e to the operational emissions of 18 metric tons CO_2e per year gives the total Proposed Project annual GHG emissions of approximately <u>67</u> 58 metric tons CO_2e per year, which would be substantially less than the SCAQMD's significance threshold of 10,000 metric tons CO_2e per year for stationary sources. Therefore, the GHG emissions that would be generated by the Proposed Project would not significantly contribute to global climate change. Impacts would be less than significant.

SCE-32 SCE provided as an attachment to the November 15, 2011 submittal to the CPUC "Results of the Focused Plant Surveys for the Presidential Substation Project, Ventura County, California" by Bonterra Consulting, dated July 28, 2011 (*revised August 31, 2011*). Based on previous Bonterra botanical surveys, the Draft EIR identified that rare plants do not occur in the footprint of the Proposed Project and determined that the Proposed Project would not have a direct impact on special-status plants.

Draft EIR Impact 4.4-7 identified that rare plant surveys were outstanding for portions of Alternative Subtransmission Alignment 1 and proposed Mitigation Measures 4.4-6a and 4.4-6b to identify and mitigate potential impacts to rare plant populations. (This impact and mitigation measures have been renumbered as Impact 4.4-8 and Mitigation Measures 4.4-8a and 4.4-8b in the Final EIR. See Chapter 4 for text changes.) The Bonterra (2011) technical report submitted as Comment SCE-32 entitled, *Results of the Focused Plant Surveys for the Presidential Substation Project, Ventura*, further documents the absence of rare plant populations on the Proposed Substation site, Alternative Substation Site B, and on the proposed subtransmission line route. As a result of these surveys, the conclusions for the Proposed Project remain unchanged and additional focused botanical surveys are not required to document the absence of rare plants from the project area. However, the 2011 botanical surveys were not comprehensive for the Alternative Subtransmission Alignment 1; thus, Mitigation

Measures 4.4-8a and 4.4-8b are needed to address potential impacts to rare plant populations, if Alternative Subtransmission Alignment 1 is selected. No substantive changes are proposed to the Draft EIR findings as a result of the botanical survey report provided by SCE. However, the following language has been updated on Draft EIR page 4.4-43 to clarify that Mitigation Measures 4.4-8a and 4.4-8b would apply to Alternative Subtransmission Alignment 1:

Mitigation Measure 4.4-6a: <u>Mitigation Measure 4.4-8a</u>: In portions of the alignment <u>Alternative Subtransmission Alignment 1</u> that have not been surveyed for special status plants...

SCE-33 SCE provided a revised version of Draft EIR Figure 2-10. This figure has been updated in Draft EIR Chapter 2, *Project Description*, page 2-33. See Chapter 4 of this document.

3.4.3 SCE Table – Responses to Comments from SCE
Comment	Section	Page	Comment	Suggested Revision	
SCE-T-1	ES	ES-3 and global comment throughout the document	Under the heading ES.1.1 Proposed Project , the 1st bullet states the substation site is 4 acres. This should be 5.4 acres as communicated in a memo from SCE to the CPUC on April 8, 2011.	Please revise all references to say 5.4-acre site.	Referent site hav
SCE-T-2	ES	ES-4 (Also applicable to Page 2-6, Table 2-1)	Regarding Table ES-1 under the heading Construction of a new 66/16 kV low-profile distribution substation (Proposed Presidential Substation) on an approximate four-acre site , the 11 th bullet point uses the word gate (singular). There is more than one gate at the substation.	Please revise to make gate plural.	Comm
SCE-T-3	ES	ES-4 (Also applicable to Page 2-6, Table 2-1)	Regarding Table ES-1 under the heading Remove existing poles and construct new subtransmission poles and underground distribution facilities; install 66 kV subtransmission conductor to proposed Presidential Substation, there is an incorrect reference to "circular" LWS poles, which should be revised.	Please revise as follows: "Install approximately 66 steel subtransmission poles with polymer insulators within existing ROW (25 TSPs, of which two are described in the substation section above, and 41 light weight steel (LWS) circular poles)."	Comm
SCE-T-4	ES	ES-4 (Also applicable to Page 2-6, Table 2-1)	 Regarding Table ES-1 under the heading Remove existing poles and construct new subtransmission poles and underground distribution facilities; install 66 kV subtransmission conductor to proposed Presidential Substation, please insert the word "road" prior to the use of ROW in the following bullet points: Single Circuit 66 kV subtransmission line from the junction of Read Road and Sunset Valley Road west adjacent to Read Road to the Moorpark-Thousand Oaks No. 2 (0.8 miles), within existing ROW. Single Circuit 66 kV subtransmission line from the junction of Read Road and Sunset Valley Road north adjacent to Sunset Valley Road to the Moorpark-Royal No. 2 (1.0 miles), within existing ROW. 	 Please revise as follows: "Single Circuit 66 kV subtransmission line from the junction of Read Road and Sunset Valley Road west adjacent to Read Road to the Moorpark-Thousand Oaks No. 2 (0.8 miles), within existing road ROW." "Single Circuit 66 kV subtransmission line from the junction of Read Road and Sunset Valley Road north adjacent to Sunset Valley Road to the Moorpark-Royal No. 2 (1.0 miles), within existing road ROW." 	Comm
SCE-T-5	ES	ES-4 (Also applicable to Page 2-6, Table 2-1)	Regarding Table ES-1 under the heading Remove existing poles and construct new subtransmission poles and underground distribution facilities; install 66 kV subtransmission conductor to proposed Presidential Substation, please include the clarification regarding the ROW pertinent to construction of new access roads or improvement of existing roads for construction and maintenance of subtransmission facilities.	Please revise as follows: "Construct new access roads or improve existing roads for construction and maintenance of subtransmission facilities <u>within existing and/or new ROW</u> ."	Comm
SCE-T-6	ES	ES-8	A footnote should be added to the portion of the text under the heading ES.2 Alternatives that explains, "Other factors considered, in accordance with CEQA guidelinesgeneral plan consistency" The footnote should explain that per GO 131-D, local jurisdictions are preempted from enforcing local land use and zoning regulations and discretionary permitting requirements. Therefore general plan consistency is included in the analysis, but such general plan policies, goals and land use designations are not applicable to the Proposed Project.	Please insert the following footnote: <u>CPUC GO 131-D, Section</u> <u>XIV.B states that "local jurisdictions acting pursuant to local</u> <u>authority are preempted from regulating electric power line</u> <u>projects, distribution lines, substations, or electric facilities</u> <u>constructed by public utilities subject to the Commission's</u> <u>jurisdiction. However in locating such projects, the public utilities</u> <u>shall consult with local agencies regarding land use matters."</u> <u>Consequently, public utilities are directed to consider local</u> <u>regulations and consult with local agencies, but the county and</u> <u>city regulations are not applicable as the county and cities do not</u> <u>have jurisdiction over the Proposed Project.</u>	The fol ES-8: <u>The</u> <u>131</u> regu sub <u>sub</u> <u>sub</u> <u>Intr</u> Ger In a Sec sub the <u>Ger</u> <u>Pre</u> juri pro <u>con</u> <u>Put</u> age

CPUC Response nces in the Draft EIR to the size of the Presidential Substation ve been revised as follows: re5.4 acre site with 2.5 acres of disturbed area ent incorporated. ent incorporated. ent incorporated. ent incorporated. llowing text has been added as a footnote on Draft EIR page e Proposed Project is subject to CPUC General Order No. -D, Section XIV.B, which preempts local jurisdictions from ulating electric power line projects, distribution lines, stations, or electric facilities constructed by public utilities ject to the Commission's jurisdiction. See Chapter 4, oduction of Environmental Analysis for a discussion of neral Order No. 131-D." addition, the following text has been added to Draft EIR ction 4.0, Environmental Analysis, page 4-2, under the heading Environmental Assessment Methodology: "Scope of Environmental Assessment neral Order No. 131-D Section XIV. Complaints and emption of Local Authority, Subsection B states that local sdictions are preempted from regulating electrical power line jects, distribution lines, substations or electric facilities structed by public utilities subject to CPUC jurisdiction. blic Utilities, such as SCE, are required to consult with local ncies regarding land use maters; however, local policies do

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-6 (cont.)					not Pro issu The pol con
SCE-T-7	ES	ES-10	Under the heading Alternative Subtransmission Alignment 1 Description, with regard to the second paragraph, it states that both the subtransmission and 16 kV distribution circuits would be constructed underground at HWY 23 crossing. Telecommunications would also be underground at this location.	Please revise as follows: "The new telecommunication line would also be installed overhead on the LWS poles. Both The subtransmission, telecommunications, and 16 kV distribution circuits would be constructed underground at the Hwy 23 crossing."	Comm
SCE-T-8	ES	ES-11	Under the heading Rationale for Full Analysis, the following sentence should be updated to include information about how this alternative would also affect air quality impacts: "This alternative would lessen the level of impacts on noise but would result in new significant unavoidable impact on aesthetics."	Please revise as follows: "This alternative would lessen the level of impacts on noise, <u>would result in a significant unavoidable</u> <u>impact to air quality (same as Proposed Project)</u> , but would result in a new significant unavoidable impact on aesthetics."	The po betwee impacts Propose discuss
SCE-T-9	ES	ES-13	Under the heading System Alternative B , the reference to the current equipment containing a 16.8 MVA rating at 55 degree rise is incorrect. The correct rating is 16.8 MVA at 65 degree rise and the base manufacturer rating is 15 MVA at 55 degree rise.	Please revise as follows: "This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at <u>65</u> 55 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones."	This te System elimina Alterno
SCE-T-10	ES	ES-15	 For clarification, SCE included the following biological resources APM in the PEA, which should also be included in the DEIR under the heading ES.3.2 Applicant Proposed Measures: "Additional Biological Resource APMs SCE may propose additional biological resource APMs following receipt of results of focused surveys that would be conducted as part of the Proposed Project (please see Section 3.7, Environmental Surveys, for more information), and consultation with appropriate agencies." 	Please include the Additional Biological Resource APMs from SCE's PEA.	Comm
SCE-T-11	ES	ES-16	Under the heading ES.3.2 Applicant Proposed Measures, APM-PAL-01 states a Final Report will be included in the monitoring plan. For clarification, the final report will come at the end of the project.	Please revise as follows: "The Paleontological Monitoring Plan shall also include a final monitoring report <u>provision for the</u> preparation of a final report at the conclusion of the project."	Comm
SCE-T-12	ES	Table ES-3 starting on page ES-21	The title of Table ES-3 should be updated to accurately reflect that this table represents the Proposed Project, and not the Alternative Routes.	Please revise the title of Table ES-3 to read "Summary of Impacts and Mitigation for the <u>Proposed Project</u> Alternative Routes."	Comm
SCE-T-13	ES	ES-21	Regarding Table ES-3 Summary of Impacts and Mitigation for the Alternative Routes, SCE's comments relating to impact conclusions as well as mitigation measures can be found later in this comment table's applicable resource section.		No resj
SCE-T-14	ES	ES-40	The title of Table ES-4 should be updated to accurately reflect that the table only examines the increase or decrease to significant unavoidable impacts and is not reflective of increases or decreases for all resource areas that had potential impacts.	Please revise the title of Table ES-4 as follows: " <u>Significant and</u> <u>Unavoidable</u> Environmental Impacts Increased or Decreased by Implementing an Alternative."	Comm
SCE-T-15	Chapter 1	1-1	The following sentence is inaccurate and should be revised as the substation site would not be constructed within a ROW: "The proposed Presidential Substation, an unstaffed and automated, 56MVA, 66/16 kV low-profile distribution substation, would be constructed on a 4-acre site within a 5.4 acre ROW or acquired property"	Please revise as follows: "The proposed Presidential Substation, an unstaffed and automated, 56MVA, 66/16 kV low-profile distribution substation, would be constructed on a 5.4-acre <u>site</u> within a 5.4 acre ROW or acquired property"	Revised on a dist Oal

CPUC Response
apply to such projects. This preemption would include the posed Project. As a result, any analysis on local policies and les provided in this EIR is for informational purposes only. e Proposed Project is not required to comply with local icies and therefore a conflict with a local policy is not usidered a significant impact. so Master Response 2. Non-CEOA Issues.
ent incorporated.
int of the referenced sentence is to present the differences on the alternative and the Project relative to environmental s. Identifying the ways this alternative is the same as the ed Project would not be helpful in the rationale for full analysis sion. The suggested revision has not been incorporated.
echnical information was factored into further consideration of a Alternative B. However, System Alternative B was ated from analysis in the Final EIR. See Master Response 1, <i>atives</i> in Section 3.1.1, for details.
ent incorporated.
ent incorporated.
ent incorporated.
ponse necessary.
ent incorporated.
d as follows: a <u>4-acre5.4-acre</u> site within a <u>5.4-acre ROWwith 2.5 acres of</u> <u>turbed area</u> or acquired property-in the City of Thousand ks, near the eastern boundary of the City of Simi Valley.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-16	Chapter 1	1-3	Under the heading 1.3.2 Other Agencies , please correct the following sentence to more accurately represent Other Agencies' potential roles and responsibilities: "In addition to the CPUC, State agencies such as the California Department of Transportation (Caltrans), California Department of Fish and Game (CDFG) and the Regional Water Quality Control Board (RWQCB) would be involved in reviewing and/or approving the project."	Please revise as follows: "In addition to the CPUC, State agencies such as the California Department of Transportation (Caltrans), California Department of Fish and Game (CDFG) and the Regional Water Quality Control Board (RWQCB) would could be involved in reviewing and/or approving permitting the project."	Text a t be pro
SCE-T-17	Chapter 2	2-1	Under the heading Project Location , please correct the following sentence to properly characterize the project location: "The proposed subtransmission alignment traverses directly west from the proposed Presidential Substation across open space, agricultural and residential areas along Read Road…"	Please revise as follows: "The proposed subtransmission alignment traverses directly west from the proposed Presidential Substation across <u>property that contains</u> open space, agricultural <u>uses</u> ; and residential areas along Read Road"	Chang
SCE-T-18	Chapter 2	2-5	On Figure 2-3 "Proposed Project," please add a footnote to explain that a summary of the Proposed Project components can be found in Table 2-1.	Please insert the following footnote "The Proposed Project consists of related telecommunications components not featured on this figure; a summary of the Proposed Project components can be found in Table 2-1."	Comm descrit <u>The</u> <u>feat</u> four
SCE-T-19	Chapter 2	2-6 - 2-7	Regarding Table 2-1 Summary of Proposed Project Components , please update the table to reflect the comments made to Table ES-1 in the Executive Summary.		Comm
SCE-T-20	Chapter 2	2-7	 Under the heading 2.5 Proposed Project Components, the following sentences are in conflict with one another and should be revised: "a separate PTC application and CEQA review for the additional 66 kV subtransmission source line would be required. Future permitting and licensing requirements for any additional 66 kV subtransmission source line have yet to be determined." 	Please revise as follows: "If current relevant laws and CPUC regulations apply at the time that the additional 66 kV subtransmission line should be proposed, a separate PTC application and CEQA review for the additional 66 kV subtransmission source line would be required. Future permitting and licensing requirements for any additional 66 kV subtransmission source line have yet to be determined."	Chang clarific
SCE-T-21	Chapter 2	2-7	Under the heading 2.5.1.1 Proposed Presidential Substation , the following locational reference is unclear and should be revised: "would be constructed on a 4-acre site in the City of Thousand Oaks near the eastern boundary with the City of Simi Valley (Figure 2-1)."	Please revise as follows, "would be constructed on a 4 <u>5.4-acre</u> site in the City of Thousand Oaks <u>and</u> near the eastern <u>western</u> boundary with <u>of</u> the City of Simi Valley (Figure 2-1)."	See Re
SCE-T-22	Chapter 2	2-10	Under the heading One 66 kV Switchrack , the following sentence is incorrect and should be revised because there would be two conductors per phase: "The operating and transfer buses would each be approximately 120 feet long and consist of one 1,590 kcmil ACSR per phase."	Please revise as follow: "The operating and transfer buses would each be approximately 120 feet long and consist of one <u>two</u> 1,590 kcmil ACSR <u>conductors</u> per phase."	Comm
SCE-T-23	Chapter 2	2-10	Under the heading 66 kV Circuit Breakers and Disconnect Switches , the following sentence is incorrect and should be revised because there would be two group operated disconnect switches: "The bus-tie position would be equipped with a circuit breaker and one group-operated disconnect switch."	Please revise as follow: "The bus-tie position would be equipped with a circuit breaker and one two group-operated disconnect switches."	Comm
SCE-T-24	Chapter 2	2-11	Under the heading One Mechanical and Electrical Equipment Room (MEER), the following sentence is incorrect and should be revised to reflect the correct dimensions: "The MEER dimensions would be approximately 36 feet long, 20 feet wide and 12 feet high."	Please revise as follow: "The MEER dimensions would be approximately 36 feet long, 20 <u>15</u> feet wide and 12 feet high."	Comm

CPUC Response
nended as follows: ne Regional Water Quality Control Board (RWQCB) would nvolved in reviewing and/or <u>approving permitting</u> the sect.
e not made as the existing text is clear and does not need ation.
ent incorporated. A footnote was added to Figure 2-3 that es additional project components on Table 2-1: Proposed Project consists of related telecommunications components not red on this figure. A summary of the Proposed Project components can be d in Table 2-1.
ents incorporated as appropriate.
not made as the existing text is clear and does not need ation.
ent incorporated.
ent incorporated.
ent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-25	Chapter 2	2-13	Regarding Table 2-2 Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "From the proposed Presidential Substation west along Olsen Road a crossing onto the private driveway" is incorrect and should be revised.	Please revise as follows: 13 vaults 13 <u>14</u> pull boxes <u>1 handhole</u>	Comme
SCE-T-26	Chapter 2	2-13	Regarding Table 2-2 Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "Under Moorpark Road near the intersection of Read Road and Moorpark Road" is incorrect and should be revised.	Please revise as follows: θ <u>2 vaults</u> <u>3 pull boxes</u> <u>2 pads</u> <u>5 handholes</u>	Comme
SCE-T-27	Chapter 2	2-13	Regarding Table 2-2 Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "Under Tierra Rejada Road near the intersection of Sunset Valley Road and Tierra Rejada Road" is incorrect and should be revised.	Please revise as follows: 0 <u>3 vaults</u> <u>4 pull boxes</u> <u>1 pads</u> <u>2 handholes</u>	Comme
SCE-T-28	Chapter 2	2-14	Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities (continued from page 2-11), it should be clarified that additional structures would be installed for the section of the duct bank at the intersection of Moorpark Road and Read Road.	Please revise as follows: "A section of duct bank would be installed at <u>in and adjacent to</u> the intersection of Moorpark Road and Read Road to underground the existing 16 kV distribution line in order to create additional space for the new 66 kV subtransmission line. <u>This</u> <u>installation of the duct bank would require approximately 2 new</u> <u>vaults</u> , 3 pull boxes, 2 pads, and five handholes."	Commo
SCE-T-29	Chapter 2	2-14	Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities (continued from page 2-11), it should be clarified that additional structures would be installed for the section of the duct bank at the intersection of Tierra Rejada Road and Sunset Valley Road.	Please revise as follows: "A section of duct bank would also be installed at <u>in and adjacent to</u> the intersection of Tierra Rejada Road and Sunset Valley Road to underground the existing 16 kV distribution line in order to create additional space for the new 66 kV subtransmission line. <u>This installation of the duct bank would</u> <u>require approximately 3 new vaults, 4 pull boxes, 1 pad, and 2</u> <u>handholes</u> "	Commo
SCE-T-30	Chapter 2	2-14	Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities, the approximate length of the duct bank is incorrect and should be revised.	Please revise as follows: "From the west end of the vault, an underground duct bank containing four 5-inch diameter conduits would be constructed approximately 12,500 8,500 feet long."	Correct
SCE-T-31	Chapter 2	2-14	Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities, the fourth paragraph references 13 new vaults and 13 new pull boxes. As previously mentioned, this should be revised to 13 new vaults, 14 new pull boxes and one new handhole.	Please revise as follows: "It is estimated that approximately 13 new vaults with associated vent pipes would be installed along this route along with approximately 13 <u>14</u> new pull boxes and one new handhole."	Commo
SCE-T-32	Chapter 2	2-14	Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities, the length of the underground duct bank from the vault outside of Presidential Substation heading west across HWY 23 to Sunset Valley Road is incorrect and should be revised.	Please revise as follows: "From the west end of the vault, an underground duct bank containing four 5-inch diameter conduits would be constructed approximately 12,500 <u>8,500</u> feet long, as measured <u>from the vault outside of Presidential Substation west</u> across HWY 23 to Sunset Valley Road."	Correctincorpo
SCE-T-33	Chapter 2	2-14	Under the heading Lighting , the following sentence is incorrect and should be revised to reflect the accurate number of incandescent lamps: "Typical lighting at SCE's distribution substations consists of approximately fifteen 120 volt incandescent lamps rated at 120 watts."	Please revise as follows: "Typical lighting at SCE's distribution substations consists of approximately fifteen thirty 120 volt incandescent lamps rated at 120 watts."	Commo reflect

CPUC Response
ent incorporated.
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t length based on GIS data is 9,400 feet. Comment
brated with corrected number.
ent incorporated.
t length based on CIS data is 0,400 feet. Comment
brated with this new number.
ent incorporated Section A.1. Assthatics was also revised to
this change.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-34	Chapter 2	2-19	Regarding Table 2-4 Summary of Pole Information , the number of poles removed for "Wood" is incorrect and should be revised.	Please revise the number of poles removed for the Wood pole type from 89 to 94.	Based numbe change
SCE-T-35	Chapter 2	2-20	The footnote on Figure 2-8 is incorrect and should be deleted as the Hi-Lo Switch Tubular Steel Pole and Hi-Lo Tubular Steel Pole are types of dead- end poles that would be used for the Proposed Project. For clarification, while these specific pole names are not called out in the text of the Project Description, they are included in the overall pole count for the project.	Please remove the asterisk and the corresponding footnote.	Figure Hi- are Pro
SCE-T-36	Chapter 2	2-21 - 2-26	Regarding Figure 2-9a through Figure 2-9f , please note that the pole heights reflected on the maps are not exact and are within the ranges expressed in the legend.		The le the pol
SCE-T-37	Chapter 2	2-27	Under the heading Light Weight Steel Poles , the third bullet point is incorrect and should be revised as the LWS poles in this location could range from 61-75 feet ags.	Please revise as follow: "Along Tierra Rejada Road, near the junction of Sunset Valley Road, approximately three existing wood subtransmission poles and one guy stub would be replaced with three LWS poles (approximately 61-65 <u>75</u> feet ags)."	Comm page 2
SCE-T-38	Chapter 2	2-29	Under the heading 2.7.2 Worker Environmental Awareness Training , it should be noted that the Qualified SWPPP Practitioner (QSP) is now spelled out by the storm water Construction General Permit (CGP) as the person "assigned responsibility for non-storm water and storm water visual observations, sampling and analysis, and responsibility to ensure full compliance with the permit and implementation of all elements of the SWPPP, including the preparation of the annual compliance evaluation and the elimination of all unauthorized discharges." This position should be included as personnel associated with the Proposed Project.	Please revise as follow: "A list of phone numbers of SCE personnel associated with the Proposed Project (archeologist, biologist, environmental compliance coordinator, <u>"Qualified SWPPP Practitioner (QSP)</u> ,"and regional spill response coordinator)."	Comm
SCE-T-39	Chapter 2	2-31	For clarification, under the heading 2.8.1 Staging Areas , there may be instances where personal vehicles could be at the staging areas and/or construction sites. For example, this can include environmental monitors who are subcontractors to SCE.	Please revise as follows: "During construction, <u>most</u> workers would <u>typically</u> park their personal vehicles at the SCE Thousand Oaks Service Center, SCE Moorpark Substation, SCE Northern Transmission Office/Pardee Substation in Santa Clarita, <u>staging</u> <u>areas, construction sites, and/</u> or at a marshalling yard and carpool to the jobsite daily in company vehicles."	Comm
SCE-T-40	Chapter 2	2-31	Under the heading 2.8.1 Staging Areas , as a point of clarification, crushed rock is not the only material SCE may use for surfacing at staging areas.	Please revise as follows: "The yard would be surfaced with erushed rock would be managed with the appropriate erosion control Best Management Practices (BMPs), which may include crushed rock if the existing surface is not compatible with"	Comm
SCE-T-41	Chapter 2	2-31	For clarification, under the heading 2.8.1 Staging Areas , this section should be revised as SCE is not sure if "marshalling" and/or "staging yard" uses are specifically identified in the zoning ordinances.	 Please revise as follows: 1st paragraph: "SCE would ensure that the constructing staging area is zoned to allow the use of marshalling and/or staging yards." 3rd paragraph: "If an existing commercial facility or other property zoned to allow the use of marshalling and/or staging yards is leased near the Proposed Project" 	No cha some f
SCE-T-42	Chapter 2	2-31	Under the heading 2.8.2 Access Roads , the text refers to a combination of existing paved and unpaved public and private roads while Table ES-1 refers to "new access roads." This information is inconsistent and the following sentence should be revised:	Please revise as follows: "Construction vehicles and equipment would use a combination of <u>new and</u> existing paved and unpaved public and private roads."	Comm
			"Construction vehicles and equipment would use a combination of existing paved and unpaved public and private roads."		

on GIS data and figures provided by SCE, the approximate er of wood poles that would be removed is 89. As such, no e will be made to the Draft EIR.

e was amended to add a note stating:

i-Lo Switch Tubular Steel Pole and Hi-Lo Tubular Steel Pole e types of dead-end poles that would be used for the Proposed oject.

egend of the figures includes two notes addressing the range of le heights, and the fact that the heights are approximates; No e is needed.

nent incorporated as recommended and in the second bullet on 2-27 as well.

nent incorporated.

nent incorporated.

nent incorporated.

ange made. The term "zoned to allow" was used to provide flexibility and was an important point for analysis.

nent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-43	Chapter 2	2-32	Under the heading 2.8.2.2 Subtransmission Lines, Relocation of Existing Distribution Lines and Telecommunication Installation , the following sentence is incorrect and should be revised as an acceleration and a deceleration lane will be constructed in front of the substation along Olsen Road: "The subtransmission line construction vehicles and equipment would use the existing paved asphalt roads identified below. No changes to these existing roads would be required"	Please revise as follows: "The subtransmission line construction vehicles and equipment would use the existing paved asphalt roads identified below. No changes to these existing roads would be required. "	Commen
SCE-T-44	Chapter 2	2-33	Regarding Figure 2-10 , there have been some minor revisions to the access road figure. Those revisions do not result in any new environmental impacts.	Please replace Figure 2-10 with the updated figure provided in SCE's comment package.	Figure 2- Chapter 4
SCE-T-45	Chapter 2	2-34	For clarification, under the heading 2.8.3.1 Site Preparation and Grading , initial site preparation and grading could occur at any time.	Please revise: "Initial site preparation and grading would occur during the dry season; consequently no dewatering activities are anticipated, and if dewatering activities are necessary the required permits will be obtained."	Change n contained
SCE-T-46	Chapter 2	2-34	Under the heading 2.8.3.1 Site Preparation and Grading , the following sentence is incorrect and should be revised to include the correct slope and compaction percentages: "The area to be enclosed by the perimeter wall would be graded to a slope that varies between 1 and 2 percent and compacted to 90 percent of the maximum dry density."	Please revise as follows: "The area to be enclosed by the perimeter wall would be graded to a slope that varies between 1 and 23 percent and compacted to 9095 percent of the maximum dry density."	Comment
SCE-T-47	Chapter 2	2-39	Under the heading Tubular Steel Poles , please clarify the 10 foot radial area would be cleared "as needed."	Please revise as follows: "At each proposed TSP location, an approximate 10 foot radial area would be cleared, <u>as needed</u> , using the same methods described for LWS pole installation."	Commen
SCE-T-48	Chapter 2	2-45	Under the heading Section 2.8.4.6 , the total length of trench work along portions of the 66 kV subtransmission alignment is incorrect and should be revised.	Please revise as follows: " approximately 12,500 feet along portions of the 66 kV subtransmission alignment where TSPs would be constructed. The 12,500 feet includes the trench length from the vault outside of Presidential Substation west across HWY 23 to Sunset Valley Road and also the duct bank work at both the intersections at Moorpark Road and Read Road, and at Tierra Rejada Road and Sunset Valley Road. The amount of soil to be removed would be approximately 5,000 cubic yards. Additional exaction would be required to install approximately 13 17 new vaults, 13 20 pulls boxes, 11 pads, and 8 handholes."	Comment
SCE-T-49	Chapter 2	2-48	Under the heading 2.8.5.1 Storm Water Pollution Prevention Plan , the Construction General Permit has been amended and the text should be updated to reflect the amendment.	Please revise as follows: "Construction of the Proposed Project would disturb a surface area greater than 1 acre. Therefore, a Construction General Permit (Order Number 2009 009 DWQ 2010-0014-DWQ)"	Comment
SCE-T-50	Chapter 2	2-51	Regarding Conductor Installation activity in Table 2-7 , the quantity for Drum Straw Line Puller should be included.	Please revise Table 2-7 under conductor installation to specify " <u>1</u> - Drum Straw Line Puller."	Commen
SCE-T-51	Chapter 2	2-52	Regarding Fiber Optic Installation activity in Table 2-7 , the number of work days should be revised.	Please revise the number of work days from 10 to 14 days	The sugg revised en not reflec results in 0.1 metric emissions

CPUC Response
nent incorporated.
2-10 has been replaced with the new figure provided. See er 4.
e not made. No data provided to support the change or ned in the PEA.
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aggested revision has been incorporated. Note that SCE's d emission estimate assumptions (see Response SCE 150) do flect the suggested change in workdays; however, the revision s in such a minor increase in annual emissions (i.e., less than etric tons CO2e per year), no adjustment to the SCE's revised ions estimates are necessary.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-52	Chapter 2	2-54	Under the heading 2.8.6.2 Construction Schedule , it should be noted that project construction cannot begin until SCE has obtained the necessary land acquisition rights and permits. As such, SCE requests the estimated schedule dates be removed from Table 2-8.	Please remove the "Estimated Schedule" column from Table 2-8 Proposed Construction Timetable.	The es follows
SCE-T-53	Chapter 2	2-56 Table 2-9	 Regarding the following bullet point in Table 2-9, "Using double-circuit construction that reduces spacing between circuits as compared with single-circuit construction." It should be clarified that this bullet point refers to the comparison of two construction designs: Single-circuit construction is designed with each circuit installed on individual poles adjacent to one another; increasing the spacing between circuits. Double-circuit construction is designed to have both circuits on the same pole, thereby reducing the spacing between conductors 		The fo <u>NC</u> a
SCE-T-54	Chapter 2	2-57	Grading permits (ministerial) should be included in Table 2-10 Summary of Permits Requirements	Please add in Grading Permits (ministerial) from Ventura County and City of Thousand Oaks under the local permit section.	Comm
SCE-T-55	Chapter 3	3-8 - 3-13	Please update Table 3.2 to reflect SCE's comments for sections 3.4.1 to 3.4.5.		Chang inform Section
SCE-T-56	Chapter 3	3-17	Under the heading Alternative Subtransmission Alignment 1 Description, the second paragraph states that both the subtransmission and 16 kV distribution circuits would be constructed underground at HWY 23 crossing. Telecommunications would also be underground at this location.	Please revise as follows: "The new telecommunication line would also be installed overhead on the LWS poles. Both The subtransmission, telecommunication line, and 16 kV distribution circuits would be constructed underground at the Hwy 23 crossing."	Comm
SCE-T-57	Chapter 3	3-17	Under the heading 3.4.1 Alternative Subtransmission Alignment 1 Description , it should be clarified that the 16 kV and telecommunication lines would still need to be underground at the connection points to the existing 66 kV.	Please revise as follows: 'The existing 16 kV distribution line and a telecommunication line would be installed on the new LWS poles and the existing wooden 16 kV distribution poles currently in the alignment would be removed. The 16 kV and telecommunication lines would be underground at the intersections of Moorpark Road and Read Road as well as Esperance Road and Tierra Rejada Road to make clearance for the new 66 kV line segment."	Comm

stimated schedule in Draft EIR Table 2-8 has been updated as vs:

Estimated Schedule

January 2012 To be determined

February 2012-March 2013 2 to 3 months after construction begins

February 2012 – January 2013 2 to 13 months after construction begins

February 2012-March 2013 2 to 15 months after construction begins

February 2012 – September 2012 <u>2 to 9 months</u> after construction begins

April 2013-16 months after construction begins

Occurs throughout construction, to be completed by-<u>April 2012-approximately 16 months after</u> <u>construction begins</u>

ollowing has been added to the bottom of Table 2-9: <u>OTES:</u>

This refers to the comparison of two construction designs:

- 1) Single-circuit construction is designed with each circuit installed on individual poles adjacent to one another; increasing the spacing between circuits.
- 2) Double-circuit construction is designed to have both circuits on the same pole, thereby reducing the spacing between conductors.

nent incorporated.

ges have been made to Chapter 3 as appropriate based on new nation from SCE. Also see Master Response 1, *Alternatives* in on 3.1.1 for additional information.

nent incorporated.

nent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-58	Chapter 3	3-17	Under the heading 3.4.1 Alternative Subtransmission Alignment 1 Description , it should be clarified that subtransmission would utilize new underground conduit and structures while distribution and telecommunication lines will utilize existing structures at the HWY 23 crossing.	Please add the following sentences to the end of the first paragraph on page 3-17: <u>"The subtransmission would be</u> <u>constructed underground at the HWY 23 crossing and would</u> <u>require new underground conduit and structures. The 16 kV</u> <u>distribution circuits and telecommunication lines would be</u> <u>constructed in existing underground conduit and structures.</u> "	Comm
SCE-T-59	Chapter 3	3-17	Under the heading 3.4.1 Alternative Subtransmission Alignment 1 Description , it is unclear which site the "substation site" is referring to in the second paragraph. If it is referring to Alternative Substation Site B, although SCE has not performed detailed engineering for this alternative site, the description appears inaccurate because it does not appear feasible for any new line to enter that site from the north, particularly because of the existing steep slope.	Please revise as follows: "The alignment would terminate at the substation. For the proposed substation site, the lines would enter from the north. It is anticipated for the alternative substation site, the lines would enter from either the west or the south. Site entering the substation from directly north."	Comm
SCE-T-60	Chapter 3	3-17	Under the heading 3.4.1 Alternative Subtransmission Alignment 1 Description , regarding the second paragraph for the description of the second source line along Esperance Road, for this alternative, SCE anticipates utilizing the Read Road route for new telecommunication line and would not require a second telecommunication line along Esperance Road route.	Please revise as follows: "A new telecommunication line and 16 kV distribution circuit would be installed on the new LWS poles."	Comm
SCE-T-61	Chapter 3	3-17	Under the heading 3.4.1 Alternative Subtransmission Alignment 1 Description , it is anticipated land rights for access roads that may not follow the subtransmission line may be required.	Please revise as follows: "For 1.8 miles, the alignment would cross generally overland requiring new ROW up to 25 feet wide as well as additional land rights for access that may not follow the subtransmission line."	Comm
SCE-T-62	Chapter 3	3-17	 Under the heading 3.4.1, Alternative Subtransmission Alignment 1, the statement regarding construction duration is not substantiated as it does not take into consideration the following: Without additional engineering, it is anticipated the construction duration may be longer for this alternative as this alternative will potentially require: 1. Additional access roads which may not be in the same alignment as the 66 kV line, 2. One or more water crossings for access to the subtransmission poles, and 3. A longer total length for subtransmission lines. 	Please revise as follows: "In total, Alternative Subtransmission Alignment 1 would be approximately 4.5 miles long, and would cross land presently used for open space and rural residential purposes. Construction methods and duration would be similar to those described for the Proposed <u>Project</u> . With the additional access roads and potential water crossings, the construction <u>duration is anticipated to be longer than the Proposed Project</u> . Trenching for the installation of 16 kV distribution lines along Read Road and east of Hwy 23 would not be required under this Alternative."	The co crossin longer support method Propos propose Alignm to be re attachii labor at additio crossin The co would incorpo
SCE-T-63	Chapter 3	3-17	Under the heading Feasibility , the following statement "Additional ROW easements would need to be negotiated with property owners to gain easements for the new ROW" should be clarified to include land rights for both the subtransmission line and the related access roads.	Please revise as follows: "Additional ROW easements would need to be negotiated with property owners to gain easements for the <u>new line and related access roads</u> ROW."	Comm
SCE-T-64	Chapter 3	3-18	Under the heading Lessen Significant Environmental Impacts as mentioned above, additional access roads will be required for this alternative, the subtransmission lines are longer, and one or more water crossings may be required for access to the subtransmission poles. For these reasons, it cannot be supported that construction for Alternative 1 will be a shorter period of time.	Please revise as follows: "This alternative would operate construction equipment for a shorter period of time and result in fewer truck haul trips since 12,500 feet of duct bank would not be constructed."	Text cl Thi sho few not
SCE-T-65	Chapter 3	3-18	Under the heading Subtransmission Alignment 2 , based on conceptual engineering, SCE expects overhead facilities on both sides of the roadway.	Please update the alternative analysis.	Comm

CPUC Response
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mmenter's claim that additional access roads and water gs suggested by SCE for this alternative would result in a construction period compared to the Proposed Project is not ted by evidence. The Draft EIR's statement that construction ls and duration under the alternative would be similar to the ed Project, is supported by the fact that compared to the ed subtransmission alignment, the Alternative Subtransmission nent 1 would not require existing distribution along Read Road elocated underground, which is much more labor intensive than ng the existing distribution line to the new poles. This added ssociated with the Proposed Project is similar in scale to the nal labor associated with the additional access roads and water gs associated with Alternative Subtransmission Alignment 1. nstruction durations for the alternative and the Proposed Project be similar. Therefore, the suggested revision has not been orated.
ent incorporated.
nanged as follows: is alternative would operate construction equipment for a wrter-similar period of time and result-but would result in ver truck haul trips since 12,5009,400-feet of duct bank would be constructed.
ent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-66	Chapter 3	3-18	Under the heading 3.4.2 Alternative Subtransmission Alignment 2 Description , the following sentence is incorrect and should be revised to reflect the referenced road: "The second source line would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Madera Road and Tierra Rejada Road in the City of Simi Valley, and follows Madera Road to the substation sites."	Please revise as follows: "The second source line would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Madera Road and Tierra Rejada <u>Royal Avenue</u> in the City of Simi Valley, and follows Madera Road to the substation sites."	Comm
SCE-T-67	Chapter 3	3-18 - 3-19	 Under the heading 3.4.2 Alternative Subtransmission Alignment 2 Description, the description is deficient because it does not include the scope of work required for this alternative. Please see the following list for additional scope: 1. A telecommunication line would be required for this alternative. The telecommunication line would travel west from the proposed substation site under HWY 23 and along Read Road. Replacement of existing wood poles along some or all of this telecommunications route could be required, depending on the results of windloading surveys. Such surveys have not been performed to date. 2. Modification of access roads east of HWY 23 could also be necessary. 3. Potential tree removal and/or tree trimming. The environmental impacts associated with this additional work were not analyzed in the DEIR. 		Draft H Alterna about o commo paragra <i>Alignn</i> <u>A t</u> <u>The</u> <u>Pre</u> <u>Mc</u> <u>nec</u>
SCE-T-68	Chapter 3	3-19	Under the heading Feasibility , the DEIR does not identify the fact that additional overhang easements are required.	Please revise as follows: "Additional ROW easements would need to be negotiated with property owners to gain easements for the new ROW. In addition, overhang easements could be required."	Comm
SCE-T-69	Chapter 3	3-19	Under the heading Potential New Impacts Created , as noted in the comments above, this alternative does not include the scope of work for telecommunications. The impacts associated with this work are not analyzed in this document, therefore, this section should be revised.		No cha Subtra adequa
SCE-T-70	Chapter 3	3-20	Under the heading 3.4.3 Alternative Subtransmission Alignment 3 Description , it is explained that this alternative would not require a Hilfiker retaining wall and widening of the access roads. However, that is incorrect as the construction of Hilfiker walls and widening of the access roads may still be required for this alternative. In addition, new access roads and a construction pad may be necessary to accommodate undergrounding the 66 kV subtransmission line. Please note the construction pad and new access roads will require significant earthwork and construction of retaining walls.	Please revise as follows: "The construction of a Hilfiker retaining wall and widening of access roads, <u>new access roads and a</u> <u>construction pad would not may</u> be required under this alternative."	Based this co Alignr wall. U Alignr The acce not add <u>Pro</u> <u>und</u> Va to a pac cor ide req in 1 des acc <u>nec</u>

ent incorporated.

EIR Chapter 3 (pages 3-18 and 3-19) provides a description of ative Subtransmission Alignment 2 that includes information construction on or near existing roadways. In response to this ent the following paragraph has been added after the fifth aph under the heading 3.4.2 *Alternative Subtransmission nent 2*:

elecommunication line would be required for this alternative. e telecommunication line would travel west from the esidential Substation site under Hwy 23 and along Read Road. odification of access roads east of Hwy 23 could also be cessary as would some potential tree removal and/or tree nming.

ent incorporated.

anges to the Draft EIR analysis for Alternative insmission Alignment 2 are necessary. The existing analysis ately reflects the original and revised scope of this alternative.

on data responses provided by SCE subsequent to receipt of omment letter (see Appendix H), Alternative Subtransmission ment 3 would not require construction of a Hilfiker retaining Under the heading 3.4.3 Alternative Subtransmission ment 3, the following paragraph is revised as follows:

e construction of a Hilfiker retaining wall-and widening of ess roads identified for pole removal and installation would be required under this alternative. Under this alternative, litional groundwork would be required compared to the posed Project. For the portion of the alignment that will be lergrounded (from the intersection of Read Road and Sunset lley Road heading east), SCE would construct a large flat pad accommodate construction vehicles, turnaround areas, crane areas for installing the vault, and access roads for struction and maintenance. Widening of access roads ntified for pole removal and installation would not be uired under this alternative as the 16 kV poles would remain place and would accommodate the telecommunication line, as cribed above. Some additional widening and grading of the ess road along the 66 kV underground alignment may be essary if engineering determines existing access roads do not et standards required for construction equipment.

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-71	Chapter 3	3-21	 Under the heading 3.4.3 Alternative Subtransmission Alignment 3 Description, the DEIR states, "The alignment east of Hwy 23 would follow the same underground alignment identified for undergrounding the 16 kV distribution line in the Proposed Project. However, for this alternative, the 16 kV distribution line would remain overhead on existing poles, while the 66 kV would be installed underground." Without engineering and additional information, it cannot be determined whether it is feasible to underground the 66 kV line in place of the proposed underground distribution line. Based on a conceptual review, the following potential challenges exist with placing the 66 kV line underground east of HWY 23 following the same alignment as the 16 kV distribution line: It is unknown whether the area on the east side of HWY 23 avails sufficient room or radius for the required angles SCE would need in order to construct this proposed alternative. The unknown constraints of an existing water pipeline 		Comm impact detail t noted b
SCE-T-72	Chapter 3	3-21	Under the heading Relocation of Existing 16 kV Distribution , the sequence of activities is incorrect and should be revised.	Please revise as follows: "Along Sunset Valley Road from Tierra Rejada Road south to the intersection with Read Road – and Along Read Road from approximately Moorpark Road east to the intersection with Sunset Valley Road. Existing wooden poles carrying 16 kV distribution lines would be removed. Following installation of new poles (predominantly LWS), the 16 kV distribution line would be installed on the new poles beneath the 66 kV subtransmission line. In addition, a telecommunication line would also be installed on the same poles. Existing wooden poles carrying 16 kV distribution lines would be removed."	Comme
SCE-T-73	Chapter 3	3-22	Under the heading Relocation of Existing 16 kV Distribution , the following statement is incorrect and should be revised because the telecommunications line would be installed on existing 16 kV distribution poles: "the existing wooden poles would remain in place and continue to support the 16 kV distribution line. A telecommunication line would also be installed in the duct bank as described for the Proposed Project."	Please revise the first bullet point on page 3-22 as follows: "A telecommunication line would also be installed in the duct bank as described for the Proposed Project. A telecommunication line would be installed on the existing wood 16 kV distribution poles. It is anticipated that the new telecommunication cable would be installed on the existing wood distribution poles in the communication space. A wind loading study would need to be performed on the existing wood poles to verify if the telecommunication cable can be accommodated. If the telecommunication cable cannot be accommodated, certain poles may need to be replaced. If a wood distribution pole is required to be replaced that the replacement pole would be the same height and type as the existing wood pole, providing that there is enough space on the pole to install the new telecommunications conductor while maintaining CPUC GO-95 clearances, then a five foot taller wood pole would likely be required."	The wipoles c
SCE-T-74	Chapter 3	3-22	Under the heading Lessen Significant Environmental Impacts , since SCE has not done any engineering on this alternative, it is not known at this time whether overhead 66 kV facilities (e.g., riser poles to take underground 66 kV line overhead into the substation) would be required outside the substation. Therefore, the following conclusion "the aesthetic impacts associated with the overhead 66 kV subtransmission line in the vicinity of Olsen Road would be eliminated" is unsupported.		Draft E One side sub <u>unc</u> sub

CPUC Response

nent noted. Pursuant to CEQA Section 15126.6 (d), significant ts caused by an alternative can be discussed at a lower level of than those caused by the Proposed Project. The concerns are but not incorporated.

nent incorporated.

ind loading study provided by SCE indicates that the wooden can accommodate the load. No text change is necessary.

EIR Page 3-21 has been updated as follows:

the double-circuit subtransmission line reaches the east be of Hwy 23, the line would continue underground to the new ostation<u>, where it would enter the substation either</u> <u>derground or via a TSP Riser Pole located outside the</u> <u>ostation</u>.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-75	Chapter 3	3-22	Under the heading Lessen Significant Environmental Impacts , since SCE has not done any engineering on this alternative, it is not known at this time whether Hilfiker walls and widening of the access roads may still be required for this alternative. Therefore, the following conclusion, "this alternative eliminates the need to construct an access road and replace poles along the eastern portion of Read Road and east of HWY 23, the overall air quality and noise impacts would be reduced" is unsupported.		See Re
SCE-T-76	Chapter 3	3-22	Under the heading Potential New Impacts Created , as noted in the comments above, this alternative does not include the scope of work for telecommunications. The impacts associated with this work are not analyzed in this document, therefore, this section should be revised.		No cha Subtra adequa
SCE-T-77	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , as previously mentioned, the substation site acreage is incorrect and the approximate size of the subject parcel is 5.29 acres, which includes the existing driveway access to the site.	Please revise as follows: "Alternative Substation Site B would construct a new 66/16 kV substation on an approximate 2.3-5.29-acre parcel of land located on the north site of Madera Road in the City of Simi Valley."	Comm
SCE-T-78	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , please clarify the existing condition of the site.	Please revise as follows: "The Parcel contains several abandoned concrete block buildings and structures, a garage, <u>paved</u> parking areas and formerly contained four underground fuel storage tanks."	Comm
SCE-T-79	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , since final engineering has not been completed, based on initial site assessment, due to the constraints of the property topography and width of the existing access driveway, an additional route may be needed for the 66 kV and/or distribution circuits into the substation (anticipated to be on the west side of the property).		Comm consid kV and Respon
SCE-T-80	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , for clarification, some of the existing pavement, concrete berms, fencing, and landscape may remain.	Please revise as follows: "The development of the substation site would consist of the complete demolition of <u>all most</u> above ground and any below ground structures. The existing site would be cleared of all buildings, <u>and most of the following</u> : hardscape, landscape, irrigation, perimeter fencing /block walls and foundations. All debris unsuitable for reclaimed materials would be disposed of at an approved landfill."	Comm
SCE-T-81	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , the following statement is unclear as to what the 'remainder of the site' is referring to: "It is anticipated that the remainder of the site would be graded as cut to create the required fill." Without this definition, it is impossible to determine whether the potential environmental impacts as represented are accurate.		The for the former of the form
SCE-T-82	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B - Description , for clarification, some of the existing pavement, concrete berms, fencing, and landscape may remain.	Please revise as follows: " <u>Most All</u> existing impervious surfaces, such as asphalt pavement, roof structures, and sidewalks would be eliminated."	Comm
SCE-T-83	Chapter 3	3-23	Under the heading 3.4.4 Alternative Substation Site B – Description , the description does not include reference to a retaining wall that would be required to accommodate the substation footprint.	Please revise as follows: "The ground surface is presently terraced upslope, from the lower parking lot and internal roads to the upper building pad and parking lot, the lower level up to the upper level elevations. It is anticipated that the remainder of the site would be graded as cut to create the required fill. The proposed grading for Alternate Substation Site B would involve creating a pad consisting of a 1.5 percent minimum to 3 percent maximum slope to accommodate positive drainage across all substation equipment. It is anticipated that an approximately 16 foot high retaining wall would be required on the south side of the parcel."	Comm

esponse SCE-T-70.

anges to the Draft EIR analysis for Alternative ansmission Alignment 3 are necessary. The existing analysis nately reflects the original and revised scope of this alternative.

nent incorporated.

nent incorporated.

ment noted. Draft EIR text was not changed as after deration, the text appears compatible with construction of a 66 nd/or distribution circuits on the west side of the property. See onse SCE-T-71.

nent incorporated.

ollowing text change has been made: is anticipated that the remainder of the site would be graded as t to create the required fill.

nent incorporated.

nent incorporated.

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-84	Chapter 3	3-24	Under the heading 3.4.4 Alternative Substation Site B - Description (continued from page 3-23), neither final engineering nor a landscaping plan have been completed for this site, therefore it cannot be determined how similar this design will be compared to the Proposed Project.	Please revise as follows: "While engineering and configuration of Alternative Substation B would be different than the Proposed Project Substation because the site is smaller, substation equipment heights would are likely to be the same, However until final engineering is completed, this cannot be determined. Design of the perimeter wall and landscaping would be coordinated with the City of Simi Valley and would likely be similar to the Proposed Project."	Based of text hat Wh wor the san <u>sub</u> add <u>16</u> wal Sin
SCE-T-85	Chapter 3	3-24	Under the heading 3.4.4 Alternative Substation Site B - Description (continued from page 3-23), similar to the Proposed Project, SCE anticipates approximately three distribution duct banks initially.	Please revise as follows: "The construction and alignment of the 16 kV distribution getaways would be similar to the Proposed Project, but may require construction of two approximately three distribution duct banks underneath Olsen Road."	Comm
SCE-T-86	Chapter 3	3-24	 Under the heading 3.4.4 Alternative Substation Site B - Description (continued from page 3-23), the description is deficient because it does not include the scope of work required for this alternative. The following elements need to be included for this alternative: 1. Due to the elevation of the alternate substation site, heights of the subtransmission poles coming into the substation could increase. 2. Additional distribution poles may be required to facilitate exiting 16 kV getaways out of the substation. 		Under followi <u>An</u> con
SCE-T-87	Chapter 3	3-24	Under the heading Feasibility , as previously mentioned, the substation site acreage is incorrect and the approximate size of the subject parcel is 5.29-acres, which includes the existing driveway access to the site.	Please revise as follows: "Acquisition of approximately 2.3 5.29 acres of land for the substation site would have to be negotiated with property owners (currently the City of Simi Valley)."	Comm
SCE-T-88	Chapter 3	3-24	 Under the heading Lessen Significant Environmental Impacts, the following information should be taken into consideration before making conclusions regarding the environmental impacts associated with this alternative: 1. Demolition activities should be included in calculations for air quality and noise impacts. 2. Aesthetics analysis needs to take into consideration the retaining wall and civil work required for this alternative site. 		Common the text
SCE-T-89	Chapter 3	3-24	Under the heading Lessen Significant Environmental Impacts , the following statement is inaccurate and should be revised based on the comments made above regarding Alternative Substation Site B (e.g., pole heights may increase). "Alternative Substation Site B would eliminate the need for an overhead subtransmission line to cross Olsen Road under Alternative Alignments 1, 2, and the proposed subtransmission alignment, this eliminates the significant unavoidable aesthetic impacts associated with the crossing."		The for Con wou cros Alia this imp wou <u>how</u> sign dev be o

CPUC Response

on information received from SCE on February 24, 2012, this s been updated as follows:

hile engineering and configuration of Alternative Substation B uld be different than the Proposed Project Substation because site is smaller, substation equipment heights would be the me although due to the elevation of the site, the heights of the transmission poles coming into the site could increase and litional distribution poles may be required for the existing kV getaways out of the substation. Design of the perimeter Il and landscaping would be coordinated with the City of mi Valley and would likely be similar to the Proposed Project.

ent incorporated.

the heading 3.4.4 Alternative Substation Site B, the ing has been added to the end of the fourth paragraph:

approximately 16 foot high perimeter wall would be astructed at the top of the elevated grade.

ent incorporated.

ent noted. Draft EIR text not changed as after consideration t appears adequate.

ollowing text change has been made:

nstruction of a new substation at Alternative Substation Site B uld eliminate the need for an overhead subtransmission line to ss Olsen Road under Alternative <u>Subtransmission</u> gnments 1, 2, and the proposed subtransmission alignment <u>a. This</u> eliminates the significant unavoidable aesthetic pacts associated with the crossing. <u>In additionThis alternative</u> <u>uld include the construction of a 16 foot high retaining wall,</u> <u>wever</u>, because the site is already an industrial site, the nificant unavoidable aesthetics impacts associated with velopment of the proposed Presidential Substation site would eliminated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-90	Chapter 3	3-24	The complete scope of System Alternative B was not identified in the DEIR, therefore SCE made some assumptions in order to preliminarily assess the feasibility. SCE's conceptual analysis determined a substantial amount of additional work could be necessary to construct the alternative as described in the EIR.		Chang inform Section
			In addition to the installation of the new larger transformers, this alternative could require the following:		
			• Replacement and reconfiguration of existing equipment such as a new bus configuration, relocation of existing capacitor banks, reconfiguration of the existing 16 kV bus, installation of new capacitor banks, and relocation of existing 66 kV structures to accommodate the reconfiguration.		
			• Removal of existing foundations and installation of new foundations to support new transformers.		
			• Reconductoring of at least one existing 66 kV line.		
			• New capacitor bank required at Malibu substation in Agoura Hills.		
			• Construction of substations cannot occur simultaneously, therefore it has to occur sequentially and will create a longer construction duration.		
			• Construction of 16 kV distribution lines.		
SCE-T-91	Chapter 4.1	4.1-3	Under the heading Proposed Presidential Substation , as previously mentioned, the substation site acreage is incorrect and the approximate size of the subject parcel is 5.4-acre	Please revise as follows: "Surrounded by avocado orchards, the Substation, which would have a 4 <u>5.4</u> -acre footprint"	Text h Si w
SCE-T-92	Chapter 4.1	4.1-5 - 4.1.10	Regarding the figures titled Existing Settings, the context photos selected seem to show an idealized version of the existing landscape, and lack representation of the area's mix of suburban, commercial, rural residential, agricultural land uses and related infrastructure.		The ph represe charac vantag viewsh locatic
SCE-T-93	Chapter 4.1	4.1-11 - 4.1-12	Under the heading Proposed Subtransmission Alignment along Read Road from Moorpark Road to Sunset Valley Road , it is noted on both page 4.1-11 and 4.1-12 that there are approximately 40 residences located along the south side of Read Road.		The nu aerial
			Please clarify the buffer used to determine the number of residences as 40 residences appears to be excessive.		
SCE-T-94	Chapter 4.1	4.1-13	Under the heading Proposed Subtransmission Alignment along Sunset Valley Road from Tierra Rejada Road to Read Road , it is noted in the third paragraph that "motorists on Tierra Rejada Road would travel under the tie in point of the proposed subtransmission line with the Moorpark- Royal No 2 66 kV subtransmission line…"	Please revise as follows: "Tierra Rejada Road is a four-lane road that travels east-west. Motorists on Tierra Rejada Road would travel <u>parallel</u> under the <u>to</u> the tie-in point of the proposed subtransmission line with the Moorpark-Royal No. 2 66 kV subtransmission line"	Comm
			For clarification, motorists would not travel "under" the tie point as it is on the same side of the road as the existing 66 kV line.		
SCE-T-95	Chapter 4.1	4.1-18	Under the heading Alternative Subtransmission Alignment 3 (continued from page 4.1-17), it states that "this portion of Alternative Subtransmission Alignment 3 but would be entirely underground, and consequently not visible to the public."	Please revise as follows: "this portion of Alternative Subtransmission Alignment 3 would be entirely underground; however, a tubular steel riser pole would be located at Sunset Valley Road and Read Road where the segment goes underground. The riser poles would be taller and more prominent than the 66 kV	The fo Alt the Ro
			located at Sunset Valley Road and Read Road. Therefore, the conclusion that this portion of Alignment 3 would not be visible to public is incorrect.	subtransmission poles characteristic along the rest of Alignment 3."	tha <u>int</u> tub

ges have been made to Chapter 3 as appropriate based on new nation from SCE. Also see Master Response 1, *Alternatives* in on 3.1.1 for additional information.

has been revised as follows:

urrounded by avocado orchards, the Substation, which yould have a 4 acres footprint, would be built on land which s presently disturb 2.5- acres of undeveloped land.

hotos shown in Draft EIR Figures 4.1-2a through 4.1-2f depict sentative public vantage points that portray the existing visual cter of the sites of the Proposed Project and alternative. These ge points were chosen because they capture the range of heds that would be affected, which includes visually sensitive ons such as designated scenic roadways.

umber of residences along Read Road was determined using photographs shown in Draft EIR Figures 2-9a through 2-9f.

nent incorporated.

ollowing text change has been made:

ternative Subtransmission Alignment 3 would be identical to e Proposed Project with respect to the segment on Read oad from Moorpark Road to Sunset Valley, and the segment ong Sunset Valley from Tierra Rejada to Read Road, except at it would end with a tubular steel riser pole at the tersection of Sunset Valley and Read Road, instead of a pular steel pole.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-96	Chapter 4.1	4.1-18	Under the heading Alternative Substation Site B, as previously mentioned, the substation site acreage is incorrect and the approximate size of the subject parcel is 5.29 acres, which includes the existing driveway access to the site.	Please revise as follows: "Alternative Substation Site B is located on an approximate $\frac{2.3}{5.29}$ acre parcel of land on the north side of Madera Road in the City of Simi Valley."	Chang
SCE-T-97	Chapter 4.1	4.1-20	 Under the heading HWY 23 on page 4.1-20, it notes that "For motorists traveling northbound on HWY 23, the portion of the alignment crossing Hwy 23 would be visible from a distance of 0.6 mile or roughly 39 seconds." Please confirm that based on the elevation of the freeway and the existing elevation of Read Road, these subtransmission alignments would actually be visible when traveling northbound. 		No cha conduc as 0.6
SCE-T-98	Chapter 4.1	4.1-20	 Under the heading HWY 23, paragraph 2 states "whereas Alternative Subtransmission Alignment 3 would be underground on the either side of Hwy 23, resulting in no views." As noted above, there would be an approximately 80-foot tall TSP riser pole located at Sunset Valley Road and Read Road. Therefore, the conclusion that this portion of Alignment 3 would not be visible to public is incorrect. 		No cha TSP w approx on Hw facing vegeta
SCE-T-99	Chapter 4.1	4.1-21	 Under the heading Moorpark Road, it notes that "Moorpark Road is a north-south two-lane County road that has been designated as an Eligible County Scenic Highway by Ventura County. Traffic volumes are moderate, estimated at 16,500 vehicles per day." Please clarify from which location the 16,500 vehicle per day measurement was taken. 		The fo Mo bee Ve 16, (no
SCE-T-100	Chapter 4.1	4.1-26	With respect to heading Underwood Family Farms , the existing setting does not include a discussion of the fact that there is existing infrastructure including utility poles, agricultural facilities, and chain link fencing. Please include this information as it should be taken into consideration in the aesthetics analysis.		No cha Existin include pages
SCE-T-101	Chapter 4.1	4.1-30	Regarding Table 4.1-2, there is not sufficient evidence in the DEIR to demonstrate why the Underwood Family Farms is given a moderate to high rating for visual sensitivity. As discussed, with respect to the text on 4.1-26, the DEIR should include a discussion of the fact there is existing infrastructure nearby and visible from the farm and this existing infrastructure should be accounted for when determining the sensitivity designation for Underwood Family Farms. In light of this infrastructure, visual sensitivity for Underwood Family Farms should be revised to moderate.		As des modera includi distanc would quality infrast Sunset the vis distinc
SCE-T-102	Chapter 4.1	4.1-30 Table 4.1-2	Regarding Table 4.1-2, the reference to the view exposure of the Ronald Regan Library is incorrect: The table states view exposure is "Foreground and Middleground distance" while on page 4.1-26 and 4.1-59, it is explained that the only component of the Proposed Project that would be visible from the library is the Sunset Valley portion which would be "within background view, and would be barely discernable within this viewshed."	Please revise the "View Exposure" column for the library to read: "Foreground and Middleground Background Distance."	As the 3 are a has bee For

CPUC Response

ge incorporated.

ange has been made to Draft EIR Section 4.1, *Aesthetics*. The ctor spanning the freeway would be visible from as far away mile, which is approximately where the road curves.

ange has been made to Draft EIR Section 4.1, *Aesthetics*. The yould be screened by intervening trees and would be ximately 0.75 mile away. Given the speed at which a motorist vy 23 would be traveling, the fact that a motorist would not be the pole, the distance of the pole, and the intervening tion, the pole would be imperceptible.

ollowing text has been clarified:

borpark Road is a north-south two-lane County road that has en designated as an Eligible County Scenic Highway by entura County. Traffic volumes are moderate, estimated at ,500 vehicles per day <u>in the vicinity of the Proposed Project</u> <u>borth of Santa Rosa Road</u>) (Ventura County, 2010b).

ange has been made to Draft EIR Section 4.1, *Aesthetics*. ng infrastructure in the vicinity of Underwood Family Farms is led in the description of Sunset Valley Road on Draft EIR 4.1-13 and 4.1-14.

scribed in Draft EIR Table 4.1-2, Underwood Family Farms' rate-to-high visual sensitivity is a function of several factors, ing that the project would be viewed within foreground ce, views would be unobstructed, the number of viewers be high, view duration would be moderate, and the visual y of the site is representative. The presence of existing tructure within the viewshed (included in the description of t Valley Road on Draft EIR pages 4.1-13 and 4.1-14), is why sual quality of the farms is described as representative, and not ct.

e Proposed Project and Alternative Subtransmission Alignment approximately 1.9 miles west of the Library, the following text een clarified:

reground and Middleground/ Background Distance

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-103	Chapter 4.1	4.1-31	Under the heading, Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please revise as follows: " <u>CPUC General Order No. 131-D</u> explains that local land use regulations would not apply to the <u>Proposed Project. However for informational purposes, the</u> following goals and policies identified in the Ventura County, City of Thousand Oaks, and City of Simi Valley General Plan, as well as the City of Thousand Oaks Zoning Ordinance would otherwise be relevant to the Proposed Project and Alternatives:"	See Re
SCE-T-104	Chapter 4.1	4.1-46 - 4.1-52	Impact 4.1-2, Impact 4.1-3 as well as the associated mitigation measures are misclassified as mitigating a scenic resource within a state scenic highway because there is no state scenic highway. The potential impacts are more appropriately discussed under criterion c).		No cha Impact the conscenic EIR pa scenic county (Draft scenic page 4
SCE-T-105	Chapter 4.1	4.1-46	Under the heading Impact 4.1-3; HWY 23 , the reference to 954 Aluminum Conductor Steel Reinforced (ACSR) should be corrected to refer to 954 Stranded Aluminum Conductor (SAC).	Please revise as follows: "From this vantage point, the Proposed Project would replace an existing 16 kV distribution line and associated wooden poles with a single-circuit 66 kV subtransmission line, composed of new light-weight-steel (LWS) poles ranging from 61 feet to 65 feet with a 954 <u>Stranded</u> <u>Aluminum Conductor (SAC)</u> <u>Aluminum Conductor Steel</u> <u>Reinforced (ACSR)</u> and polymer insulators."	Comm
SCE-T-106	Chapter 4.1	4.1-47	Under the heading Impact 4.1-2; HWY 23, please note within the viewshed being described, there are existing utility poles that should be considered. The second paragraph, explains that for the retaining wall, "…viewers would be exposed to it for a short distance and given the presence of other structures in the viewshed (i.e., highway signs, the highway median barrier, satellites and antenna)." As such, these same considerations should apply to the presence of the poles as discussed in this paragraph.	Please revise as follows: "viewers would be exposed to it for a short distance and given the presence of other structures in the viewshed (i.e., <u>existing utility poles</u> , highway signs, the highway median barrier, satellites and antenna)."	The la A14-2 applica
			Thus, the conclusion that the landscape's moderate-to-high visual sensitivity does not account for these other industrial features and therefore overstates the visual sensitivity. As a result, it is not substantiated that Impact 4.1-2 would be adverse and potentially significant, resulting in the need for Mitigation Measures 4.1-2a and 4.1-2b.		
SCE-T-107	Chapter 4.1	4.1-47	With respect to Mitigation Measure 4.1-2a and Mitigation Measure 4.1- 3b which requests SCE use poles made of self-weathering steel, SCE does not currently use this type of pole. Therefore, SCE does not have any experience with constraints that may be associated with the use with this type of pole and has not been able to perform an engineering analysis to determine if it is feasible for this project. For this reason and a number of other reasons, SCE has significant concerns about using these types of poles.	Please delete Mitigation Measure 4.1-2a and Mitigation Measure 4.1-3b.	Mitiga viewsł comm require coatiny structu succes
			 SCE's concerns include, but are not limited to the following: Due to high potential for corrosion and rusting, these are not ideal in areas that are exposed to long periods of wetness and/or moisture (e.g., high humidity, fog, or exposure to salt). The corrosion and rusting could create a safety issue because the moisture could result in a loss of the structural integrity of the poles. Here the existing environment consists of landscaping and agriculture, therefore, the proposed alignment would result in poles being exposed to wetness from irrigation. 		Accord follow Mi vis Hi <u>Ol</u> ste

esponse SCE-T-6, above.

ange has been made to Draft EIR Section 4.1, *Aesthetics*. ets to scenic roadways are analyzed under criterion b; although mmenter correctly states that there are no designated state highways in the vicinity of the project (discussed on Draft age 4.1-45), there are numerous county- and city-designated roadways. In keeping with the spirit of criterion b, impacts to y-designated scenic roadways are analyzed under Impact 4.1-2 EIR page 4.1-46 et seq.), and impacts to city-designated roadways are analyzed under Impact 4.1-3 (Draft EIR 4.1-49 et seq.).

nent incorporated.

nguage in question has been modified pursuant to Comment 99. See Response A14-29 in Section 3.2 for an explanation of able changes.

ation is required for pole structures that are visible from heds where visual impacts are significant. In response to this ent, Mitigation Measure 4.1-2a has been changed to no longer e self weatherizing steel; rather, it now requires a surface g with appropriate colors, finishes and textures, to blend the ures with visible backdrop landscape. This technique has been ssfully used in a different SCE project, San Joaquin Cross 7 Loop (Final EIR published in February, 2010).

dingly, Mitigation Measure 4.1-2a has been changed as vs:

itigation Measure 4.1-2a: For all <u>pole</u> structures that are sible from viewsheds where visual impacts are significant (i.e., ghway 23, and Read Road, Underwood Family Farms<u>, and</u> <u>sen Road</u>), SCE shall install tubular steel poles or light weight wel poles made of self weatherizing steel, which would oxidize

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-107 (cont.)			• The poles cannot be direct buried because contact with soil can accelerate corrosion, leading to possible failure of the poles. While the poles can be placed in concrete, doing so will create a greater impact area, which may result in challenges should pole replacement be required in the future (e.g. a damaged or rusted pole needs to be replaced due to unforeseen circumstances), as the poles cannot be replaced directly adjacent to or in the exact same location. Instead, the replacement would need to be located far enough away from the original pole location to accommodate safe excavation and installation of a new concrete foundation. In addition, locating poles adjacent to or near the site of the poles to be removed would be further complicated by the fact that some locations have limited space because of existing drive ways, underground utilities, trees, etc. SCE is concerned that existing constraints on Read Road may affect the location of the proposed and any future pole locations.		to a SCI finis the fror shal lanc con pole sky bler <i>Trea</i> pole visu ensi
			• Because self-weatherizing poles are larger and heavier, larger equipment such as cranes, additional concrete trucks or truck trips, and larger drilling rigs may be needed, which could result in additional impacts.		shal for i con:
			• For the poles where riser attachments are required, the concrete footing can create issues as the pole base is much larger than the pole, which, depending on final engineering, could necessitate the installation of additional poles for distribution and/or telecommunications lines.		from D for all c
			• In addition, self-weathering steel cross-arms may present problems such as rust contaminating insulators. SCE is concerned that such contamination could result in the insulators flashing over, potentially resulting in de-energizing of the circuit.		
			Because the DEIR does not fully investigate the feasibility of the use of these types of poles, these mitigation measures may not be feasible given the project area's existing environment. In addition, implementation of these measures may not mitigate any aesthetic impacts below a level of significance because they may still require installation of new poles, possibly resulting in additional impacts not analyzed in the DEIR and potentially far more significant than the impacts they purport to mitigate.		
SCE-T-108	Global	4.1-48, 49	To be consistent with the Project Description, please replace all references to "LWS Riser Poles" with "LWS poles with 16 kV riser attachment."		Comme
SCE-T-109	Chapter 4.1	4.1-49	Under the heading Impact 4.1-2; Read Road , paragraph 2, for clarification, motorists will travel parallel to the lines instead of directly beneath.	Please revise as follows: "As seen from the simulation, to motorists along Read Road the Proposed Project would appear against a backdrop of trees and sky, as motorists drive directly beneath <u>parallel to</u> the lines."	Comme
SCE-T-110	Chapter 4.1	4.1-49	Under the heading Impact 4.1-2; Read Road , second paragraph, the DEIR states the following, "Figure 4.1-5 shows an existing and simulated view (Simulation C) of the Proposed Project from Moorpark Road looking east along Read Road. As seen from the simulation, to motorists along Read Road the Proposed Project would appear against a backdrop of trees and sky, as motorists drive directly beneath the lines. Additional utility lines run the length of the north side of the road, and would be in the foreground. Given the fact that the new structures are steel instead of wood, the new poles and overhead conductors would cause a noticeable increase in structure prominence and industrial character within the landscape. Because the presence of the poles and conductors would demand attention, the resulting visual contrast would be strong. The poles would co-dominate the viewshed, along with tress and	Please revise as follows: "Because the presence of the poles and conductors would demand attention, the resulting visual contrast would be strong moderate. The poles would co-dominate the viewshed, along with tress and agricultural land. The overall visual change would be moderate to high. In consideration of Read Road's moderate visual sensitivity (e.g. it is an Eligible County Scenic Highway but has a low traffic volume), the resulting visual impact would be adverse and potentially but not significant. Implementation of Mitigation Measures 4.1-2a and 4.1-2b would reduce impacts to Read Road to less than significant"."	This co would t informa change

CPUC Response

natural looking rust color within approximately one year. E shall apply surface coatings with appropriate colors, shes and textures to most effectively blend the structures with visible backdrop landscape. For structures that are visible m one or more sensitive viewing locations, the darker color ll be selected, because darker colors tend to blend into dscape more effectively than lighter colors, which may trast and produce glare. At locations where a tubular steel e or light-weight steel pole would be silhouetted against the line, non-reflective, light-gray colors shall be selected to nd with the sky. SCE shall develop a *Structure Surface* atment Plan for the tubular steel poles, light-weight steel es, and any other visible structures in consultation with a al specialist designated by the CPUC, as appropriate, to ure that the objectives of this measure are achieved. SCE ll submit the Structure Surface Treatment Plan to the CPUC review and approval at least 90 days prior to the start of struction.

tion, references to self-weatherizing steel have been removed oraft EIR Section 4.1, *Aesthetics*, accordingly. See Chapter 4 changes made to Draft Section 4.1.

ent incorporated.

ent incorporated.

omment expresses the opinion that impacts on Read Road be less than significant; it does not provide new or additional ation that would result in a change to the impact analysis. No has been made to Draft EIR Section 4.1, *Aesthetics*.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-110 (cont.)			agricultural land. The overall visual change would be moderate to high. In consideration of Read Road's moderate visual sensitivity (e.g. it is an Eligible County Scenic Highway but has a low traffic volume), the resulting visual impact would be adverse and potentially significant. Implementation of Mitigation Measures 4.1-2a and 4.1-2b would reduce impacts to Read Road to less than significant."		
			As illustrated in Visual Simulation C, the resulting visual contrast would be moderate and not strong given the existing overhead structures and distance from which the segment would be viewed. The resulting visual impact would be adverse but not significant and thereby not requiring mitigation measures.		
SCE-T-111	Chapter 4.1	4.1-51	Under the heading Impact 4.1-3; Olsen Road, paragraphs 2 and 3:	Please revise as follows:	This c
			(Second paragraph) "the resulting visual contrast would be moderate- high, because the presence of the poles and conductors would attract attention and dominate the characteristic landscape."	(Second paragraph) "the resulting visual contrast would be moderate-high at most, moderate, because the presence of the poles and conductors would be among other commercial and	would inform change
			(Third paragraph) "the Proposed Project would appear against a backdrop of hills and sky. The new steel poles and overhead conductors would cause a <i>noticeable increase</i> in structure prominence and industrial character within the landscape" (emphasis added)	industrial features along Olsen Road such as existing poles, Ventura County East Valley Sheriff's Station, decommissioned sheriff's station, commercial development to the east of the proposed site, Calleguas Water Treatment Plant, ota attract attention and dominate the abaracteristic	
			As there are other industrial facilities (e.g., telecommunication facilities, Ventura County East Valley Sheriff's Station, decommissioned sheriff's station, commercial development to the east of the proposed site, Calleguas Water Treatment Plant, etc.) that characterize the existing landscape, the resulting visual contrast would be moderate and not moderate-high. Furthermore, the new steel poles and overhead conductors would represent at most, an incremental change in structure prominence and industrial character within the landscape as opposed to a noticeable increase. The resulting impact to Olsen Road under Impact 4.1-3, therefore would be adverse and not significant.	 <u>letc.</u> attract attention and dominate the characteristic landscape." (Third paragraph) "the Proposed Project would appear against a backdrop of hills and sky. The new steel poles and overhead conductors would cause a noticeable increase at most an incremental change in structure prominence and industrial character within the landscape" 	
SCE-T-112	Chapter 4.1	4.1-52	With respect to Mitigation Measure 4.1-3b, in addition to the above mentioned concerns regarding self weatherizing steel for structures on Olsen Road:	Please remove Mitigation Measure 4.1-3b.	As des for po impac
			• Self-weathering steel poles have the tendency to oxidize within approximately one year, which will lead to bleeding or staining of the footings and sidewalks.		Measu weath approp
			SCE has concerns with applying surface coatings to standard poles for the following reasons:		visible succes Valley
			• Painting of poles creates a perpetual maintenance obligation due to paint peeling and flaking.		Mitiga Mi
			• Maintenance of surface coating would require line outages to ensure worker safety.		4.1 SC
			• SCE would not stock these non-standard poles that are painted. If a pole needs to be replaced, SCE may not have the ability to match colors because pole manufacturers can change over time or existing manufacturers could change their color palettes and a painted pole may not be available during an emergency replacement.		po to- Al S€ an
					tex bao mo sel
					eff

comment expresses the opinion that impacts on Olsen Road l be less than significant; it does not provide new or additional nation that would result in a change to the impact analysis. No e has been made to Draft EIR Section 4.1, *Aesthetics*.

scribed in Response SCE-T-106, above, mitigation is required le structures that are visible from viewsheds where visual ts are significant. In response to this comment, Mitigation ure 4.1-b has been changed to no longer require self erizing steel, and instead require a surface coating with priate colors, finishes and textures, to blend the structures with e backdrop landscape. This technique is feasible and has been ssfully used in a different SCE project, San Joaquin Cross y Loop (Final EIR published in February, 2010).

ation Measure 4.1-3b has been changed as follows:

itigation Measure 4.1-3b: Implement Mitigation Measure <u>-2a.</u> For all structures that are visible from Olsen Road, E shall install tubular steel poles or light-weight steel les made of self weatherizing steel, which would oxidize a natural looking rust color within about one year.

ternately, in lieu of installing self weatherizing steel poles E may install standard tubular steel or light-weight steel poles d apply surface coatings with appropriate colors, finishes and ctures to most effectively blend the structures with the visible ckdrop landscape. For structures that are visible from one or ore sensitive viewing location, the darker color shall be lected, because darker colors tend to blend into landscape more rectively than lighter colors, which may contrast and produce

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-112 (cont.)					glai stee refl sky the visi
					In addi from D for all o
SCE-T-113	Chapter 4.1	4.1.54	Under the heading Impact 4.1-5 second paragraph: For clarification, SCE would coordinate restoration of the bike lane with appropriate parties.	Please revise as follows: "The proposed duct bank would be constructed under the existing bike lane on Olsen Road and would be cleaned up and restored to preconstruction conditions after construction, in accordance with the applicable SCE Franchise Agreements and/or the Encroachment Permits."	Comm
SCE-T-114	Chapter 4.1	4.1.54	Under the heading Impact 4.1-6 first paragraph: For clarification, SCE would coordinate restoration of the pull sites with appropriate parties.	Please revise as follows: "Each pull site would be cleaned up and restored to preconstruction conditions after construction, in accordance with the applicable SCE Franchise Agreements, Encroachment Permits, and/or agreements with the property owner."	Comm
SCE-T-115	Chapter 4.1	4.1-56	Under the heading Impact 4.1-8 , it is stated that "Ultimately, the visual contrast would be moderate, as the Substation would attract attention, but would not demand the viewer's attention. In addition, the project would co-dominate the landscape with the surrounding hillsides. Overall visual change would consequently be moderate. However, in consideration of the site's scenic zoning designation, the resulting visual impact would be adverse and potentially significant." With respect to CEQA criterion c), consideration of the site's scenic zoning designation would not result in an adverse and potentially significant impact. Furthermore, as previously explained, per GO 131-D, local land use regulations are not applicable to the Proposed Project and are included in this document for informational purposes.	Please revise as follows: "Ultimately, the visual contrast would be moderate, as the Substation would attract attention, but would not demand the viewer's attention. In addition, the project would co- dominate the landscape with the surrounding hillsides. Overall visual change would consequently be moderate <u>and therefore, the</u> <u>impact would be less than significant</u> . However, in consideration of the site's scenic zoning designation, the resulting visual impact would be adverse and potentially significant."	Becaus not cor designa zoning overall The tex How zon resu sign
SCE-T-116	Chapter 4.1	4.1-57	Regarding Mitigation Measure 4.1-8a , it is redundant and unnecessary to create a new mitigation measure that refers to implementation of other mitigation measures.	Please remove Mitigation Measure 4.1-8a.	Mitigat 4.1-8. I Mi t 4.1
SCE-T-117	Chapter 4.1	4.1-59	Under the heading Park and Recreation Areas, the visual sensitivity for Underwood Family Farm should be revised to "moderate," given the presence of existing infrastructure. Additionally, the impact should be revised to "adverse but not significant," and therefore, no mitigation would be required.	Please revise as follows: "Given the visual sensitivity of Underwood Family Farms (moderate-to high), impacts to visual resource would be adverse and potentially but not significant."	See Re provide to the i Section
SCE-T-118	Chapter 4.1	4.1-62	Prior comments regarding mitigation measures and significance conclusions for the aesthetic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1 . In addition, as provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis. For example, the second source line would require the construction of a new access road, and the aesthetics impacts associated with access roads were considered for the Proposed Project. Therefore, the analysis of aesthetics impact associated with the access roads for Alternative Subtransmission Alignment1 should be given the same consideration as for the Proposed Project.		The vis Alignm second Alta Pro new <u>add</u> <u>sub</u> wo

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re. At locations where a tubular steel pole or light weight el pole would be silhouetted against the skyline, nonective, light gray colors shall be selected to blend with the SCE shall develop a *Structure Surface Treatment Plan* for tubular steel poles, light-weight steel poles, and any other ible structures.

ition, references to self-weatherizing steel have been removed Draft EIR Section 4.1, *Aesthetics*, accordingly. See Chapter 4 changes made to Draft EIR Section 4.1.

ent incorporated.

ent incorporated.

se of General Order No. 131-D, the Proposed Project would nflict with the City of Thousand Oak's scenic zoning ation. However, the Presidential Substation site's scenic g designation was one of several factors used to determine the l visual sensitivity of the site.

kt on page 4.1-56 has been clarified as follows:

wever, <u>as indicated by in consideration of</u> the site's scenic ning designation, <u>the site is a visually sensitive location, and</u> the ulting visual impact would be adverse and potentially nificant.

ation Measure 4.1-8 is provided to ensure mitigation of Impact It has been corrected to read:

tigation Measure 4.1-8a: Implement Mitigation Measure -2b and Mitigation Measure 4.1-3b.

esponses SCE-T-100 and 101, above. This comment does not e new or additional information that would result in a change impact analysis. No change has been made to Draft EIR in 4.1, *Aesthetics*.

sual impact analysis for Alternative Subtransmission nent 1 has been modified as follows (Draft EIR page 4.1-63, l paragraph):

ternative Subtransmission Alignment 1 differs from the oposed Project in that it proposes approximately 1.9 miles of w ROW north of the proposed Presidential Substation site <u>and</u> <u>ditional land rights for access that may not follow the</u> <u>otransmission line</u>. This new ROW <u>and associated access road</u> ould not follow any designated or eligible scenic roads...

Comment	Section	Page	Comment	Suggested Revision
SCE-T-119	Chapter 4.1	4.1-63	Prior comments regarding mitigation measures and significance conclusions for the aesthetic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2 . In addition, as provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 2 contains additional project scope not considered in this analysis. For example, tree removal and/or trimming may be required for this alternative.	See Re Subtrar descrip (Draft I Alta Pro not Roa <u>line</u> wes <u>Rea</u> <u>loca</u> <u>be i</u> and <u>Pro</u>
SCE-T-120	Chapter 4.1	4.1-65	Prior comments regarding mitigation measures and significance conclusions for the aesthetic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3 .	Subseq loading could a
			The DEIR concludes that Alternative Subtransmission Alignment 3 is "preferred" to the Proposed Project Alignment (as seen in Chapter 5). The analysis provided for Alternative Subtransmission Alignment 3 includes conclusions such as, "pole removal and installation would be reduced," and "visual impact would be less than those for the Proposed Project east of Sunset Valley Road because wooden poles in this segment would not be removed." As previously mentioned in the comments for Chapter 3 of this DEIR, the telecommunications line east of HWY 23 to the Substation would not be installed in the duct bank but rather installed on existing wood distribution poles and may necessitate the removal and replacement of existing poles. Additionally, the telecommunications lines west of HWY 23 may also necessitate the removal and replacement of existing poles. The abovementioned assumptions used to conclude that the visual impact would be "less than for the Proposed Project" are not substantiated as such assumptions regarding the alternative are incorrect.	Alterna been m Alignm
SCE-T-121	Chapter 4.1	4.1-65	The analysis provided for Alternative Subtransmission Alignment 3 includes a conclusion that impacts would be less than those of the Proposed Project east of Sunset Valley Road due to "eliminating the introduction of new industrial features within the viewshed as well as the need for tree removal." As explained in SCE's accompanying letter, an arborist report was recently prepared for portions of Read Road in order to determine the potential for tree removal. Based on the findings of that report, it is incorrect to represent that no tree removal would be necessary for Alternative Subtransmission Alignment 3 and the analysis should be updated accordingly.	Based o languag updated less and <u>pote</u> Hov rem scee of S woo und <u>acc</u> <u>reta</u> <u>Pro</u> intr wel view

sponse SCE-T-67. In consideration of revisions to Alternative asmission Alignment 2 (see Chapter 4 for all changes to the tion of this alternative), the following text has been changed EIR Section 4.1, *Aesthetics*, page 4.1-64):

ernative Subtransmission Alignment 2 would differ from the posed Project in that it the subtransmission alignment would cross, parallel, or be visible from Moorpark Road or Read ad (Eligible County Scenic Highways). <u>A telecommunication</u> would be required for this alternative, which would travel st from the Presidential Substation site under Hwy 23 and along ad Road; however, the telecommunication line would be ated on existing distribution poles, and the visual change would imperceptible. Overall impacts to views from Moorpark Road Read Road would be less than under the Proposed jectTherefore, there would be no impact to these roads.

uent to submitting this comment SCE performed a wind g study in which it determined the existing distribution poles accommodate the telecommunications line proposed under ative Subtransmission Alignment 3. As such, no change has hade to the impact analysis for Alternative Subtransmission ment 3. See Draft EIR Section 4.1, *Aesthetics*.

on this comment and Comment SCE-T-122, the following ge in Draft EIR Section 4.1, Aesthetics, page 4.1-65, has been d:

Impacts at the proposed Presidential Substation site would be than the Proposed Project because poles within the Substation on Olsen Road would be eliminated, with the exception of the ential for one TSP Riser Pole located outside the substation. wever, like the Proposed Project, impacts to the site would nain significant and unavoidable (Class I). Visual impacts to nic roads would be less than those for the Proposed Project east Sunset Valley Road because wooden poles in this segment ald not be removed, and subtransmission facilities would be lerground,. <u>Although this portion of the alignment may require</u> ess roads for construction and maintenance, and potential ining walls to provide adequate stability, compared to the posed Project it would reduce or eliminate eliminating the oduction of new industrial features within the viewshed and as l as the need for tree removal. Impacts on the Read Road wshed west of Sunset Valley Road would be substantially less n the Proposed Project (Class III), as would subtransmission

Comment	Section	Page	Comment	Suggested Revision
SCE-T-121 (cont.)				alig <u>Cla</u> wo <u>visi</u> <u>the</u> side Roa
SCE-T-122	Chapter 4.1	4.1-65	The analysis provided for Alternative Subtransmission Alignment 3 includes a conclusion that impacts would be less than those of the Proposed Project as "the alternative subtransmission alignment would not be visible from HWY 23 or Olsen Road and no retaining wall would be required on the east side of HWY 23." As previously mentioned in the comments for Chapter 3 of this DEIR, the subtransmission line may not be underground into the substation and could require a TSP outside the substation. Additionally, the Hilfiker wall and the widening of the access roads may still be required. The abovementioned assumptions used to conclude that the visual impact would be less than for the Proposed Project are not substantiated as such assumptions regarding the alternative are incorrect.	See Re
SCE-T-123	Chapter 4.1	4.1-65	Prior comments regarding mitigation measures and significance conclusions for the aesthetic impacts analysis would be equally applicable to Alternative Substation Site B. In addition, as provided in comments for Chapter 3 of this DEIR, Alternative Substation Site B contains additional project scope not considered in this analysis. For example, elevation of the site has the potential to increase pole heights given the substation is significantly higher than the grade of Madera Road. Additionally, the grading necessary to accommodate the substation footprint would require the construction of an approximately 16 foot high retaining wall separate from the existing retaining wall. For clarification, this new 16 foot high retaining wall would be built above the existing slope (generally in the area currently used for overflow parking), which is already well above the grade of Madera Road. Therefore, the analysis of aesthetics impact associated with Alternative Substation Site B should be updated to include these components.	See Re
SCE-T-124	Chapter 4.1	4.1-66	As detailed in our accompanying letter, "no new facilities" as mentioned under System Alternative B is an incorrect assumption. In contrast, a development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. For example, this alternative would require reconductoring of the Moorpark- Royal No 2 66 kV line, installation of a new capacitor bank at Malibu Substation, and new distribution circuitry. The current analysis should be revised to account for the full scope of System Alternative B, especially these components that would occur outside of existing substations.	The red installa distribu feasibii inform System See Ma
SCE-T-125	Chapter 4.1	4.1-66	As detailed in our accompanying letter, "construction impact would consequently be less than the Proposed Project and would be less than significant" as mentioned under System Alternative B is an incorrect assumption. The analysis for System Alternative B does not take into account the duration, equipment or the full extent of the project scope for this alternative, therefore, the statement is unsupported.	The ful factore System See Ma
SCE-T-126	Chapter 4.1	4.1-66	As detailed in our accompanying letter, the no impact conclusion for System Alternative B is unsupported because it does not include a discussion of potential visual changes associated with the possible decrease of perimeter landscaping at existing substation facilities to accommodate the expanded substation footprint.	Potenti factore System See Ma

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gnment impacts to Hwy 23 and Olsen Road (No Impact ISS III). Specifically, the alternative subtransmission alignment uld not be visible from either Hwy 23, and would only be ible from or Olsen Road if a TSP Riser Pole is required outside substation., and no retaining wall would be required on the east e of Hwy 23. Impacts to Moorpark Road and Tierra Rejada ad would be the same as the Proposed Project (Class III).

sponse SCE-T-121.

esponse SCE-23.

econductoring of the Moorpark-Royal No 2 66 kV line, ation of a new capacitor bank at Malibu Substation, and new pution circuitry were factored in when further considering the ility of System Alternative B. SCE has not provided nation on other facilities that may be constructed. However, n Alternative B was eliminated from analysis in the Final EIR. laster Response 1, *Alternatives* in Section 3.1.1, for details.

Ill extent of the project scope for System Alternative B was ed into further consideration of this alternative. However, n Alternative B was eliminated from analysis in the Final EIR. laster Response 1, *Alternatives* in Section 3.1.1, for details.

ial visual changes associated with System Alternative B was ed into further consideration of this alternative. However, in Alternative B was eliminated from analysis in the Final EIR. aster Response 1, *Alternatives* in Section 3.1.1, for details.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-127	Chapter 4.2	4.2-1	Under the heading Important Farmland , the definition of Prime Farmland needs to be updated to include additional language relevant to the definition as seen in source (FMMP, 2011a).	Following the last sentence of the existing definition, include the following language, "Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date."	Comme
SCE-T-128	Chapter 4.2	4.2-1	Under the heading Important Farmland , the definition of Farmland of Statewide Importance needs to be updated to include additional language relevant to the definition as seen in source (FMMP, 2011a).	Following the last sentence of the existing definition, include the following language, "Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date."	Comme
SCE-T-129	Chapter 4.2	4.2-2	Under the heading Important Farmland , the definition of Unique Farmland needs to be updated to include additional language relevant to the definition as seen in source (FMMP, 2011a).	Following the last sentence of the existing definition, include the following language, "Land must have been cropped at some time during the four years prior to the mapping date."	Comme
SCE-T-130	Chapter 4.2	4.2-2	Under the heading Important Farmland , Table 4.2 includes information about total miles of ROW for the Proposed Project and Alternatives that would traverse land mapped as farmland, but it does not include the number of acres permanently converted. Since the impact section discusses impacts in terms of number of acres of farmland converted, the table should provide backup data for these calculations.	Please either update Table 4.2-2 to include information about the amount of acres of mapped farmland converted by each project feature for the Proposed Project and Alternatives or include a separate table that contains this information in the environmental setting.	SCE did subtrans as a pro- alternati valid sir poles we impacte subtrans change l
SCE-T-131	Chapter 4.2	4.2-5	Under the heading, Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please insert the following language underneath the heading Local: " <u>CPUC General Order 131-D explains that local land use</u> regulations would not apply to the Proposed Project. However the following are included for informational purposes only and would otherwise be relevant to the Proposed Project and Alternatives."	See Res
SCE-T-132	Chapter 4.2	4.2-6	Under the heading, Ventura County Non-Coastal Zoning Ordinance , per GO 131-D, the referenced zoning ordinance would not apply to the proposed project, <i>Ventura County Non-Coastal Zoning Ordinance (Proposed Project and Alternative Subtransmission Alignments 1 and 3.</i>	Please insert the following language at the end of the existing paragraph, " <u>CPUC General Order 131-D explains that local</u> zoning ordinances would not apply to the Proposed Project, therefore no Conditional Use Permit would be required for the Proposed Project."	See Res
SCE-T-133	Chapter 4.2	4.2-6	Under the heading, City of Thousand Oaks General Plan , insert the letter D after GO 131.	Please revise as follows: "While CPUC General Order No. 131 <u>-D</u> explains that"	Comme
SCE-T-134	Chapter 4.2	4.2-8	Under the heading 4.2-4, Impacts and Mitigation Measures , it should be noted the analysis would consider impacts to both Farmland and Forest Land.	Please revise as follows: "Based on the CEQA Guidelines, the analysis considers whether the Proposed Project would result in impacts to Farmland <u>and/or Forest Land.</u> "	Comme
SCE-T-135	Chapter 4.2	4.2-8	For clarification, under the heading 2.8.1 Staging Areas , this section should be revised as SCE is not sure if "marshalling" and/or "staging yard" uses are specifically identified in the zoning ordinances.	Please revise as follows: "and/or an approximate 3-acre <u>site</u> commercial facility located within approximately 5 miles of the construction area. SCE would ensure that the <u>constructing</u> <u>construction</u> marshalling yard is zoned to allow the use of marshalling and/or staging yards; as such, it would not be <u>land</u> that has been designated as either Prime Farmland, Farmland of <u>Statewide Importance</u> , or Unique Farmland an agricultural site."	As desc used to j analysis changed commer under In No t Pres <u>Subs</u> is no from mars Subs Cent City

CPUC Response
nent incorporated.
nent incorporated.
nent incorporated.
did not provide the locations of poles under the alternative ansmission alignments. As such, total miles of ROW was used roxy to determine relative Farmland disturbance of the atives, as compared to the Proposed Project. This approach is since the radius of disturbed area surrounding subtransmission would the same under the various alternatives, and total cted acreage would be proportionate to the amount of ansmission alignment located within designated Farmland. No ge has been made to Table 4.2-2.
esponse SCE-T-6.
nent incorporated.
nent incorporated.
escribed in Response SCE-T-41, the term "zoned to allow" was to provide some flexibility and was an important point for sis. As such the Draft EIR text pertaining to zoning will not be ged. In consideration of the other recommendations in this nent, the following changes have been made to the discussion Impact 4.2-1 (Draft EIR page 4.28): to temporary impacts to Farmland would occur at the proposed residential Substation site, as the 2.5 acres on which the <u>abstation would be constructed are 4 acre Substation footprint</u> not designated Farmland. No temporary impacts would occur om the use of the temporary marshalling yard, as the arshalling yard would be located at the existing Moorpark abstation (in the City of Moorpark); Thousand Oaks Service enter (in the City of Thousand Oaks); Pardee Substation (in the ity of Santa Clarita); and/or an approximately 3-acre site

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-135 (cont.)					com cons mar stag <u>is ne</u> Fari
SCE-T-136	Chapter 4.2	4.2-8	 Under the heading, Impact 4.2-1, the analysis provides conflicting information regarding temporary disturbance to Farmland during construction at the Proposed Substation. "Proposed Project construction would cause temporary disturbance to Farmland due to construction methods that would be used to complete the various components of the Proposed Project including subtransmission alignment construction, distribution line relocation, installation of telecommunication lines, and construction of the proposed Presidential Substation." "No temporary impacts to Farmland would occur at the proposed Presidential Substation site, as the 4-acre Substation footprint is not designated Farmland." 	Please revise as follows: "Proposed Project construction would cause temporary disturbance to Farmland due to construction methods that would be used to complete the various components of the Proposed Project including subtransmission alignment construction, distribution line relocation, installation of telecommunication lines , and construction of the proposed Presidential Substation."	Comme not map Comme changes EIR pag BIR pag distri distri teleo Proj distri teleo <u>Proj</u> distri teleo <u>Proj</u> distri teleo <u>Proj</u> distri teleo <u>Proj</u>
SCE-T-137	Chapter 4.2	4.2-8	Under the heading Impact 4.2-1 , the analysis provides conflicting information regarding the potential impacts from temporary marshaling yards (see paragraph 1 and paragraph 2).	Please revise as follows: "Temporary impacts to Farmland could occur at construction sites including a temporary marshaling yard, work areas, conductor pulling/stringing set-up locations, and access routes to poles along the subtransmission line alignment."	See Res
SCE-T-138	Chapter 4.2	4.2-9	Regarding the analysis under the heading Impact 4.2-2 , SCE would agree that portions of the Proposed Project would traverse areas mapped as Prime Farmland and Unique Farmland. However, the Proposed Subtransmission Alignment would generally be constructed within existing road ROW along Sunset Valley Road and Read Road, which is not primarily used for irrigation and agricultural uses.	SCE would request the analysis regarding conversion of designated farmland include information about the existing environmental setting.	Analysi disturba designa existing et seq.) disturbe
SCE-T-139	Chapter 4.2	4.2-11	Under the heading, 4.2.4 Impacts and Mitigation Measures c), the following sentence does not accurately reflect the existing conditions, however the suggested modifications would not alter the significance conclusion for the Proposed Project: "However, the proposed subtransmission alignment would be located in an established utility corridor in existing SCE ROW. Being located in existing SCE ROW would preclude the land from being managed for one or more forest resources"	Please revise as follows: "However, the proposed subtransmission alignment would be located in an established utility corridor in existing SCE ROW primarily existing road ROW that currently contains existing utility facilities . Being located in existing SCE <u>road</u> ROW would preclude the land from being managed for one or more forest resources"	Comme
SCE-T-140	Chapter 4.2	4.2-11	Under the heading, 4.2.4 Impacts and Mitigation Measures d), the first sentence inaccurately references criterion d) when instead it should reference criterion c)	Please revise as follows: "As discussed under criterion d) <u>c)</u> , there are no areas of forest land or timberland location within the project area, …"	Comme
SCE-T-141	Chapter 4.2	4.2-12	 Under the heading Impact 4.2-3, the material referring to subtransmission lines and honeybees should be removed from this DEIR for the following reasons: 1. The Proposed Project voltage is 66 kV, significantly less than the 345 kV cited in this section 2. The conclusion drawn that "this could have an adverse affect on agriculture" (ESA, 2011, p.4.2-12) is not substantiated within the 	Please revise as follows: The interactions between honeybees and subtransmission lines have been examined in scientific studies. Research studies have found behavioral changes in bees when subjected to elevated electric fields at levels greater than 345 kV. Although typical electric fields do not affect organism cellular and molecular function, external electric fields of a sufficiently elevated intensity can cause physical effects in whole organisms,	This an during to Draft E change page 4.2 Hor proj chan

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amercial facility located within approximately 5 miles of the struction area. SCE would ensure that the constructing rshalling yard is zoned to allow the use of marshalling and/or ging yards; as such, it would not be an agricultural site., and ot land that has been designated as either Prime Farmland, mland of Statewide Importance, or Unique Farmland.

ent incorporated. The proposed Presidential Substation site is pped as Farmland. In consideration of this comment, ent SCE-T-135, and Comment SCE-T-137, the following s have been made to the discussion under Impact 4.2-1 (Draft ge 4.28):

posed Project construction would cause temporary nurbance to Farmland due to construction methods that would used to complete the various components of the Proposed ject including subtransmission alignment construction, tribution line relocation, and installation of communication lines., and construction of the proposed sidential Substation. Temporary impacts to Farmland could uld occur at construction sites located on Farmland,, including pacts at temporary marshalling yard, work areas, conductor ling/stringing set-up locations, and access routes to poles

ng the subtransmission line alignment.

sponse SCE-T-136.

is under Impact 4.2-2 is based on estimates of anticipated ance of Farmland due to placement of new poles on areas ated by the FMMP as Farmland, and modification of an g unpaved access road east of Hwy 23 (Draft EIR page 4.2-9). This represents a conservative analysis of potentially ed acres. No change has been made to this text.

ent incorporated.

ent incorporated.

halysis was provided in response to a comment received the scoping period, and thus will not be deleted from the EIR. However, in consideration of the comment, the following has been made to the analysis (Draft EIR Impact 4.2-3, .2-12):

neybee hives exposed to electric fields higher than those jected for the Proposed Project can exhibit bee behavioral nges such as increased motor activity, redistribution of

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-141 (cont.)			Valberg report. Conversely, the report is addressing the effects of ELF- EMF on the honeybees themselves, not agriculture. The Valberg report goes on to conclude that "in those studies, little has been found in the way of adverse effects, and nothing has been found regarding adverse impacts on honeybees of EMFs at levels projected for the CapX2020 transmission lines." (Valberg, 2010, p.3) The line voltage of the CapX2020 project is 345 kV.	because of force on hairs and hair-like structures, and potentially via small electric shocks. Honeybee hives exposed to electric fields higher than those projected for the Proposed Project can exhibit bee behavioral changes such as increased motor activity, redistribution of honeycomb material (proposes), lower foraging rates, and decreased winter survival. This could have an adverse affect on agriculture (Valberg, 2010). However, because the proposed subtransmission lines have electric fields much lower than 345 kV, operation of the Proposed Project is not expected to have an impact on honeybees or pollination.	hon decr agri
SCE-T-142	Chapter 4.2	4.2-13	 Under heading, Alternative Subtransmission Alignment 1, the following statement is made: "As shown in Table 4.2-2, Alternative Subtransmission Alignment 1 would cross 0.6 miles less Prime Farmland than the Proposed Project, and 0.1 mile less Unique Farmland." The analysis should be updated to include the amount of acreage permanently converted as opposed to miles traversed. Note as provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis. For example, 1) undergrounding of existing telecommunications and distribution lines at the tap points, and 2) construction of access roads for the second source line. The current analysis should be revised to account for the full scope of Alternative 		Regard acreage analysis due to u the seco EIR Fig telecom than the
SCE-T-143	Chapter 4.2	4.2-13	Subtransmission Alignment 1. As provided in the comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 2 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		No cha Subtrar adequa
SCE-T-144	Chapter 4.2	4.2-13	As detailed SCE's accompanying cover letter, Alternative Subtransmission Alignment 3 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		No chai Subtran adequat
SCE-T-145	Chapter 4.2	4.2-14	As detailed SCE's accompanying cover letter, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		No cha Subtrar adequa
SCE-T-146	Chapter 4.2	4.2-14	As detailed in SCE's accompanying letter, "no new facilities" as mentioned under System Alternative B is an incorrect assumption. In contrast, a development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. For example, this alternative would require reconductoring of the Moorpark- Royal No 2 66 kV line, installation of a new capacitor bank at Malibu Substation, and new distribution circuitry. The current analysis should be revised to account for the full scope of		See Res from an in Secti
			System Alternative B, especially these components that would occur outside of existing substations.		
SCE-T-147	Chapter 4.3	4.3-5	Under the heading, Alternative Subtransmission Alignment 2 it is explained that the Tutor Time Child Care Center is within 50 feet of the alignment. For clarification, please include reference points for the measurement.		The refe Alterna Care Co

pneycomb material (propolis), lower foraging rates, and ecreased winter survival This could have an adverse affect on griculture (Valberg, 2010).
rding the commenter's request for the amount of disturbed ge, see Response SCE-T-138. No changes to the Draft EIR sis for Alternative Subtransmission Alignment 1 are necessary o updates to the description of this alternative. Access roads for cond source line would not be located on Farmland (see Draft 'igure 4.2-1), and undergrounding of existing ommunication and distribution lines would be similar to or less he Proposed Project.
nanges to the Draft EIR analysis for Alternative ansmission Alignment 2 are necessary. The existing analysis nately reflects the original and revised scope of this alternative.
anges to the Draft EIR analysis for Alternative ansmission Alignment 2 are necessary. The existing analysis nately reflects the original and revised scope of this alternative.
nanges to the Draft EIR analysis for Alternative ansmission Alignment 2 are necessary. The existing analysis nately reflects the original and revised scope of this alternative.
esponse SCE-T-124. System Alternative B was eliminated analysis in the Final EIR. See Master Response 1, <i>Alternatives</i> ction 3.1.1, for details.
eference points for the stated measured distance are: the native Subtransmission Alignment 2, and the Tutor Time Child Center property line.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-148	Chapter 4.3	4.3-9	Regarding the discussion under the heading 2007 Air Quality Management Plan , the following does not represent a complete sentence, "The new control measures are proposed revisions to existing VCAPCD rules that VCAPCD staff has found practicable for Ventura County pursuant." It is not clear what the word pursuant refers to.		The sec has bee The VC Ver
SCE-T-149	Chapter 4.3	4.3-10	As a point of clarification, SCE did not include APM AIR-01 as an Applicant Proposed Measure in its PEA but rather page 3-21 of the PEA explained this would be included in the Worker Environmental Awareness Plan.	Please remove APM AIR-01.	It is acl AIR-01 commi page 3- <i>Quality</i>
SCE-T-150	Chapter 4.3	4.3-11	Under the heading Impact 4.3-1 , the Draft EIR presents and evaluates estimated peak daily emissions that are not representative of the Proposed Project. The Proposed Project has been modified from the project presented in the PEA and as such, air quality emission calculations seen in Appendix C should be revised based on estimates of construction equipment use seen in Table 2-7 in the Draft EIR. Since the construction emissions analyzed in the Draft EIR are not based on these revised estimates, the construction emissions evaluated in the Draft EIR do not necessarily represent emissions	Please include the updated Air Quality construction emissions estimates for analysis in this DEIR.	The CF and has and Dr reflect Respor revisio It shou use of
			during construction of the revised project. SCE has updated construction emissions estimates based on the information seen in Table 2-7, which are included in SCE's comment package. These updated estimates should be included in this analysis.		pollutin the PEA CPUC apparen
SCE-T-151	Chapter 4.3	4.3-13	Regarding Mitigation Measure 4.3-1 it requires a plan be developed to demonstrate that on-road and off-road NOx and ROC exhaust emissions would be reduced by 20%, compared to the most recent CARB fleet average. Generally, the local Air Quality Management District would have the approval and oversight of such a plan. The Proposed Project is under the jurisdiction of the Ventura County Air Pollution Control District and is the appropriate agency to review and manage a NOx and ROC reduction plan. Furthermore, at this time, SCE cannot confirm its ability to reduce on-road and off-road NOx and ROC exhaust emissions by 20%, as equipment type, year, etc. are not known. At this time without knowing the details about the construction equipment that will be secured for the Proposed Project, and without guidance from VCAPCD to cover any shortcomings in the reduction rates, it is not clear to SCE that Mitigation Measure 4.3-1 is achievable for the Proposed Project.	Please remove Mitigation Measure 4.3-1.	There i plan to not req CPUC authori the lead respons Once th the pro- be devo measur has bee effort t Section
SCE-T-152	Chapter 4.3	4.3-14	Regarding the fourth bullet point of Mitigation Measure 4.3-2 , please clarify that these activities would only occur during construction. Also, SCE does not typically seed and water for grass growth.	Please revise as follows: "Graded and/or excavated inactive areas of the construction site shall be monitored by the mitigation monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally- safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally- safe dust suppressants, to prevent excessive fugitive dust <u>during</u> <u>construction</u> ."	It is co 4.3-2, i constru- needed 2, SCE dust su In addi clarifie related

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cond sentence of the third paragraph on Draft EIR page 4.3-9 en revised as follows:

e new control measures are proposed revisions to existing CAPCD rules that VCAPCD staff has found practicable for ntura County-pursuant.

knowledged that SCE did not identify the measure as APM l in the Application; nonetheless, SCE has identified this tment in the Project Description of its PEA (see Draft EIR -21). Therefore, for ease of reference in EIR Section 4.3, *Air y*, the CPUC identifies the measure as APM AIR-01.

PUC reviewed SCE's revised construction emission estimates as determined that the revised emission estimates are adequate raft EIR Table 4.3-3 and associated text have been updated to the revised construction emission estimates. Refer to nse SCE-31 in Final EIR Section 3.4.2 for the associated ons to the Draft EIR.

ald be noted that SCE's revised emission estimates include the emissions factors for the year 2012, which represent less ing equipment compared to the emissions factors included in A emission estimates, which were for the year 2009. The concurs with the use of 2012 emissions factors now that it is ent construction activities would not occur prior to 2012.

is no VCAPCD requirement for the Applicant to prepare a preduce construction-related emissions, and the VCAPCD has quested that the Applicant prepare such a plan. Therefore, the cannot require the VCAPCD to have approval and oversight ity of the Construction Equipment NO_x Reduction Plan. As d agency for review of the Proposed Project, it is the CPUC's asibility to review and approve the plan.

the Applicant identifies the construction equipment needs for object, the Construction Equipment NO_x Reduction Plan should reloped. In the event that the reductions required in the re are found to not be achievable, Mitigation Measure 4.3-1 en revised to ensure that the Applicant has made a good faith to achieve the reductions (refer to Response SCE-31 in n 3.4.2 for the associated revisions to the Draft EIR).

onfirmed that the activities identified in Mitigation Measure including the fourth bullet, would only be required during the uction phase of the project. The suggested revisions are not d. As described in the fourth bullet of Mitigation Measure 4.3-E could periodically treat the area with environmentally-safe appressants instead of seeding and watering for grass growth. ition, the first sentence of Mitigation Measure 4.3-2 already es that the intent of the measure is to reduce constructionl fugitive dust emissions.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-153	Chapter 4.3	4.3-19	Under the heading Alternative Subtransmission Alignment 1 , regarding the following statement: "short term construction activities could result in slightly lower overall criteria pollutant emissions compared to the construction emissions that could result under the Proposed Project," this statement is unsupported as there is no quantification of construction emissions. In addition, there is a failure to account for the emissions associated with 1) undergrounding distribution and telecommunications facilities at the tap points and 2) construction of a new access road associated with the second source line. The analysis also does not account for the fact that construction activities associated with Alternative Subtransmission Alignment 1 would likely be longer in duration than the Proposed Project, or could result in the overlap of multiple construction activities occurring at the same time, which could increase peak daily emission values.		Per CI about analys the im of the emissi the con the alt compo The D result to the Projec subtra Aligni to be r attachi The ite consid underg contin alterna commo
SCE-T-154	Chapter 4.3	4.3-19	Under the heading Alternative Subtransmission Alignment 2 , regarding the following statement: "short term construction activities could result in slightly lower overall criteria pollutant emissions compared to the construction emissions that could result under the Proposed Project" this statement is unsupported as there is no quantification of construction emissions. In addition, there is a failure to account for the emissions associated with 1) potential replacement of existing poles subject to windloading for the telecommunications components, and 2) modification of access road east of HWY 23.		Quant require SCE-T Under modify the new balance Alignn Projec Regare wind I SCE p indica Therefer requires
SCE-T-155	Chapter 4.3	4.3-20	Under the heading Alternative Subtransmission Alignment 3, regarding the following statement: "short term construction activities could result in slightly lower overall criteria pollutant emissions compared to the construction emissions that could result under the Proposed Project," this statement is unsupported as there is no quantification of construction emissions. In addition, there is a failure to account for the emissions associated with 1) Hilfiker wall and widening of access road east of HWY 23, 2) potential replacement of existing poles subject to windloading for the telecommunications components, and 3) potential grading of existing topography and construction of access roads, retaining wall(s) and a construction pad to support subtransmission line installation adjacent to HWY 23. Without quantification of Alternative Subtransmission Alignment 3 in its entirety, there is no evidence to support this alternative could result in slightly lower overall criteria pollutant emissions.		See Ro

EQA Guidelines Section 15126.6(d), sufficient information each alternative is required to allow a meaningful evaluation, is, and comparison; however, CEQA allows for examination of pacts of an alternative at a lesser level of detail than the analysis impacts of a proposed project. Therefore, quantification of ons for each alternative is not a CEQA requirement to support mparison of alternatives. The air quality impacts associated with ernatives were assessed qualitatively by comparing the onents of the Proposed Project to the alternative.

raft EIR statement that short-term construction activities could in slightly lower overall criteria pollutant emissions compared construction emissions that could result under the Proposed t, is supported by the fact that compared to the proposed nsmission alignment, the Alternative Subtransmission nent 1 would not require existing distribution along Read Road elocated underground, which is much more labor intensive than ing the existing distribution line to the new poles.

ems specific to the alternative identified in the comment were lered, and compared to the proposed relocation of distribution ground along Read Road. The opinion of CPUC staff uses to be that short-term construction activities under the ative would result in slightly lower overall emissions. The lenter has not provided adequate evidence for the CPUC to e the referenced Draft EIR statement.

ification of emissions for each alternative is not a CEQA ement to support the comparison of alternatives (see Response Γ -153, above).

this alternative, the additional equipment hours required to y an access road would likely be offset by the elimination of ed for relocation of the overhead distribution 16 kV line. On ce, construction emissions under Alternative Subtransmission ment 2 could be slightly less compared to the Proposed ct. No revisions are necessary.

ding the need to replace existing poles under the alternative for loading, subsequent to submittal of the commenter's letter, berformed a wind loading study for the existing poles that tes that the wooden poles can accommodate the load. fore, Alternative Subtransmission Alignment 2 would not e replacement poles due to wind loading concerns.

esponse SCE-28 in Section 3.4.2.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-156	Chapter 4.3	4.3-20	Under the heading Alternative Substation B, regarding the following statement: "short term construction activities would result in similar overall criteria pollutant emissions compared to the construction emissions that could result under the proposed Presidential Substation," this statement is unsupported as there is no quantification of construction emissions. This is especially true given the significant amount of demolition work and cut and fill activities required for a suitable substation site. In addition, there is a failure to account for the emissions associated with the new approximately 16 foot retaining wall.		See Re
SCE-T-157	Chapter 4.3	4.3-21	Under the heading System Alternative B , "…peak daily NOx emissions under this alternative are estimated to be approximately 22 pounds, which would exceed the significance threshold of 20 pounds." Please note the significance threshold for NOx within VCAPCD is incorrect and should be 25 pounds.	Please revise to "which would <u>not</u> exceed the significance threshold of 20 <u>25</u> pounds. However, Implementation of"	VCAP conside Alterna Master
SCE-T-158	Chapter 4.3	4.3-21	Under the heading System Alternative B , regarding the following statement: "short term construction activities could result in substantially less pollutant emissions compared to the construction emissions that could result under the Proposed Project" this statement is unsupported as there is no quantification of construction emissions. As detailed SCE's accompanying letter, the scope described for System Alternative B for evaluation of air quality impacts is incomplete as it does not address a number of components that would be required in order to develop this alternative. It also fails to address the likely need to import fill to the Thousand Oaks Substation in order to create a suitable site to implement the modified design of the substation.		The ful related further Alterna Master
SCE-T-159	Chapter 4.4	4.4-1	Under the heading Introduction , while the third paragraph describes surveys conducted by ESA, it should also clarify surveys were conducted by SCE in preparation of the PEA.	Please revise as follows: " <u>In addition to the above surveys</u> <u>conducted by Bonterra at SCE's direction</u> , field reconnaissance surveys of the Proposed Project and alternatives were performed "	The sta Fic
SCE-T-160	Chapter 4.4	4.4-4	Under the heading, Proposed Presidential Substation , as previously mentioned in the Executive Summary, reference to the 4 acre substation site should be revised to 5.4 acres.	Please revise as follows: "The principal natural communities at the 4 <u>5.4</u> acre proposed Presidential Substation site are coastal sage scrub, chamise chaparral and non-native grassland (Bonterra, 2008)."	See Re
SCE-T-161	Chapter 4.4	4.4-4	Under the heading Proposed Subtransmission Alignment , as noted in this section, some permanent impacts will occur; therefore, the words "to the extent feasible," should be added to the sentence for clarification.	Please revise as follows: "Adjacent habitat that would be spanned or otherwise avoided includes ornamental trees, willow riparian scrub, mule fat scrub, freshwater marsh, California walnut woodland, and coastal sage chaparral scrub, <u>to the extent feasible</u> ."	The sug
SCE-T-162	Chapter 4.4	4.4-16	Under the heading Special Status Plants , the third paragraph states that any impacts to CNPS Lists 1A, 1B or 2 would be considered significant. An impact analysis would need to be conducted for a given species to determine the level of significance for a project impact.	Please revise as follows: "In addition to the listed plant species, those appearing on CNPS Lists 1A, 1B, or 2 are considered to meet the criteria of CEQA Guidelines §15380. and Impacts to those species effects will need to be thoroughly analyzed to determine the level of significance to these species are considered significant in this EIR, though only List 1B species occur near the study area."	The sug clear an
SCE-T-163	Chapter 4.4	4.4-18	Under the heading, Lyons Pentachaeta , the second paragraph states that the proposed project is outside of critical habitat for Lyon's Pentachaeta. While the proposed substation site is within the critical habitat, the impact analysis does not change because Lyons Pentachaeta was not found during two years of focused surveys.	Please revise as follows: " <u>The proposed substation site is within</u> critical habitat for Lyon's Pentachaeta as designated in 2009." The Proposed Project is located near, but outside of Subunit 1C of the Simi Valley Critical Habitat Unit for this species.	The site overlap

CPUC Response
sponse SCE-25 in Section 3.4.2.
TD significance thresholds were factored into further
aration of System Alternative B. However, System
tive B was eliminated from analysis in the Final EIR. See Response 1. Alternatives in Section 3.1.1. for details
Response 1, <i>marmanives</i> in Section 5.1.1, for details.
l scope of System Alternative B, including construction-
air emissions and the need to import fill, was factored into
tive B was eliminated from analysis in the Final EIR. See
Response 1, Alternatives in Section 3.1.1, for details.
tement was clarified in Section 4.4
eld In addition to the above surveys, field reconnaissance
veys of the Proposed Project and alternatives
sponse SCE-T-1 above.
ggested revision was not incorporated as the Draft EIR is
d the change is not needed.
gested revision was not incorporated as the Draft EIR is
ad the change is not needed.
e is immediately adjacent to critical habitat, but does not
with critical habitat. See Response A14-23 in Section 3.2.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-164	Chapter 4.4	4.4-21	Under the heading Jurisdictional Waters of the U.S., Including Wetlands , the second paragraph states that the project will avoid jurisdictional areas. The Jurisdictional Delineation Report (Bonterra, 2010c. Jurisdictional Delineation Report, Presidential Substation Project, prepared for Southern California Edison, July, 2010) identifies several areas that will impact jurisdictional waters. However, as noted in Table 2-10 of this DEIR, SCE would secure permits for impacts to jurisdictional drainages. The analysis under impact 4.4-6 takes into consideration the impacts associated with jurisdictional waters.	Please revise as follows: "Along the proposed subtransmission alignment and alternative subtransmission line alignments, the relatively small footprint of the pole sites and the long spans between poles would allow avoidance of <u>may potentially impact</u> jurisdictional areas. Jurisdictional habitat does not occur at Alternative Substation Site B."	Text re Alc sub the ave jur hab
SCE-T-165	Chapter 4.4	4.4-33	 Under the heading 4.4.3 Applicant Proposed Measures, please note this section does not reflect the fact that SCE also proposed the following APM in its PEA: "Additional Biological Resource APMs SCE may propose additional biological resource APMs following receipt of results of focused surveys that would be conducted as part of the Proposed Project (please see Section 3.7, Environmental Surveys, for more information), and consultation with appropriate agencies." 	Please revise to include this missing APM from SCE's PEA.	As des reques presen "Addit
SCE-T-166	Chapter 4.4	4.4-35	Regarding Mitigation Measure 4.4-1 , SCE is required to develop and implement a Noxious Weed and Invasive Plant Control Plan. The Mitigation Measure states "at a minimum, the Plan shall address any required cleaning of construction vehicles to minimize spread of noxious weeds and invasive plants." The proposed project area is a mosaic of non-native grasslands, mixed agriculture, and coastal sage scrub habitat. Non-native plants are well established in the proposed project area; cleaning of vehicles and equipment would be an unnecessary and excessive measure.	Please remove Mitigation Measure 4.4-1	SCE h require to the s
SCE-T-167	Chapter 4.4	4.4-36	Regarding Mitigation Measure 4.4-2 a , which would require SCE and/or its contractors to perform preconstruction surveys within 24 hours of initial ground disturbance. Surveys within 72 hours of initial ground disturbance would better suit the need for flexibility required (e.g. weather, contractor delays, etc.) during construction and thus limit potential redundancy in surveys.	Please revise as follows: "Within areas that provide potentially suitable habitat, SCE and/or its contractors shall perform preconstruction surveys within 24 <u>72</u> hours of initial ground disturbance"	An ini coordi constru the site
SCE-T-168	Chapter 4.4	4.4-36	Regarding Mitigation Measure 4.4-2b , mitigation for temporary impacts are only discussed and permanent impacts are not mentioned. A bullet point should be added for permanent impacts. The mitigation for permanent impacts should state that SCE will work with the appropriate agencies to determine mitigation for potential impacts to coastal sage scrub.	Please add the additional bullet point: "For permanent impacts to coastal sage scrub, SCE will work with the appropriate resource agencies to determine mitigation."	Text re Co it is to c of a ach
SCE-T-169	Chapter 4.4	4.4-39	Regarding Mitigation Measure 4.4-4 , the fourth bullet point states that SCE will "shield wires to minimize the effects from bird collisions." This statement is inaccurate. A shield wire is another term for a static wire. Flight diverters are added to the shield wire in areas that have bird migratory routes or water crossings. Flight diverters are not generally used in construction; only in areas that have high risk for collision. Therefore this bullet point is inapplicable.	This bullet point should be removed since it is not applicable to the proposed project. Please revise as follows: " shield wires to minimize the effects from bird collisions ."	Comm
SCE-T-170	Chapter 4.4	4.4-40	Under the heading Impact 4.4-6 , as previously mentioned, the proposed subtransmission line may potentially impact jurisdictional waters. Please update this section.	Please revise as follows: "The proposed subtransmission alignment is not expected to directly or indirectly impact jurisdictional wetlands in the project area. Identified features would be avoided with a suitable upland construction buffer (e.g., at least 50 feet); therefore, no direct impacts were identified to	Comm

evised as follows:

ong the proposed subtransmission alignment and alternative btransmission line alignments, the relatively small footprint of e pole sites and the long spans between poles would allow oidance of may potentially impact jurisdictional areas as some isdictional areas occur in the project area. Jurisdictional bitat does not occur at Alternative Substation Site B.

scribed in Response SCE-T-10, this APM has been added as sted. The text in question was present in the first Draft EIR, but ited separately. Formatting has been changed to show the tional Biological Resources ..." portion is an SCE APM.

as not presented such a plan in the APMs; thus, the measure is ed to minimize impacts to gnatcatcher habitat located adjacent substation.

tial ground sweep for special status species needs to be closely inated with construction. A survey three days before uction does not adequately protect animals that wander onto e following the survey.

evised in the first bullet as follows:

bastal sage scrub shall be restored at a 1:1 ratio in areas where is temporarily disturbed. <u>If permanent impacts are anticipated</u> <u>coastal sage scrub, SCE shall establish new habitat at a ratio</u> <u>at least 1:1 (one acre of created habitat for each acre lost) to</u> <u>hieve a no-net loss standard.</u>

nent incorporated.

nent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-170 (cont.)				these features. Drainages that would be spanned by the Proposed Project include Arroyo Santa Rosa and several ditches along Olsen Road. <u>The subtransmission line for SCE's Preferred Project</u> will impact approximately 0.032 acre of "Waters of the U.S" <u>along Sunset Valley Road and approximately 0.004 acre along</u> <u>Tierra Rejada Rd. In addition, approximately 0.03 acre of waters</u> <u>under the jurisdiction of the CDFG will be impacted along Sunset</u> <u>Valley Rd."</u>	
SCE-T-171	Chapter 4.4	4.4-40	Regarding Mitigation Measure 4.4-6a , as noted in Mitigation Measure 4.4-6c, there are jurisdictional wetlands and other waters that cannot be avoided. Therefore, please add the language "to the extent feasible" to Mitigation Measure 4.4-6a.	Mitigation Measure 4.4-6a: "SCE and/or its contractors shall through project design, avoid jurisdictional waters of the U.S. and waters of the State, to the extent feasible. This includes minimizing the footprint during construction of poles for the proposed subtransmission line and spanning drainages that occur within the alignment."	Comme
SCE-T-172	Chapter 4.4	4.4-40	Regarding Mitigation Measure 4.4-6b , mitigation measures are only required for known project impacts. It is speculative to assume there will be project changes, therefore this is not an appropriate Mitigation Measure and should be removed.	Please revise as follows: "Mitigation Measure 4.4-6b: In the event of any project changes that involve ground disturbance outside of the boundary of the existing wetland delineation, a new wetland delineation shall be performed."	Comme
SCE-T-173	Chapter 4.4	4.4-40	Mitigation Measure 4.4-6c recognizes that there would be wetland impacts at the proposed substation site. However it does not mention the impacts on Sunset Valley Road and Tierra Rejada Road.	Please add the following language to indicate the subtransmission line on Sunset Valley Road will impact wetland and/or jurisdictional features as described above. Please revise as follows: "Where jurisdictional wetlands and other waters cannot be avoided, e.g., at the Proposed Presidential Substation site, <u>Sunset Valley and Tierra Rejada Roads</u> , to offset temporary and permanent impacts that occur as a result of the project"	Comme
SCE-T-174	Chapter 4.4	4.4-41	Under Impact 4.4-7 , as previously mentioned in the Executive Summary, reference to the 4 acre substation site should be revised to 5.4 acres.	Please revise as follows: "The 4 <u>5.4</u> -acre substation would be positioned immediately adjacent to existing development, which minimizes encroachment into natural habitat and allows continued local wildlife movement."	Comme
SCE-T-175	Chapter 4.4	4.4-42	Under the heading e), please add language to clarify that SCE is only required to obtain ministerial permits and not discretionary permits for tree alteration and removal pursuant to GO 131-D.	Please revise as follows: "If protected trees cannot be avoided, SCE shall consult with a certified arborist and obtain <u>ministerial</u> permits consistent with the conditions of the local agency."	No cha tree ren
SCE-T-176	Chapter 4.4	4.4-43	Under the heading 4.4.5 Alternatives, please correct the impact and mitigation numbering in the text.	Please revise to reflect appropriate numbering, such as Mitigation Measure 4.4-6a7a, Mitigation Measure 4.4-6b7b, Impact 4.4-7, etc.	Comme
SCE-T-177	Chapter 4.4	4.4-43	Regarding Mitigation Measure 4.4-6a for Alternative Subtransmission Alignment 1 , please clarify the applicability of exclusion fencing is during construction only.	Please revise as follows: "SCE and/or its contractors shall design facilities to avoid sensitive plant populations whenever possible; exclusion fencing shall be installed and maintained during construction around sensitive plant populations with as large a buffer as possible to minimize the potential for direct and indirect impacts."	Comme
SCE-T-178	Chapter 4.4	4.4-44	Regarding Mitigation Measure 4.4-7 for Alternative Subtransmission Alignment 2, which explains this alternative will avoid all impacts to riparian habitat. Without engineering for this alternative, it is unknown whether this statement is accurate. Pre-construction nesting surveys will determine the presence of any active nests in the project area.	Please revise as follows: "SCE and/or its contractors shall design Alternative Subtransmission Alignment 2 to avoid all impacts to riparian habitat <u>where feasible</u> , with poles located greater than 50 feet from the riparian corridor. If impacts cannot be avoided SCE shall consult with the appropriate agency in order to obtain the required permits. Because impacts to riparian habitat would be avoided, compensatory mitigation is not required. Additionally, in"	Some c standar See Mi Mit desi imp feet

CPUC Response
ent incorporated.
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ent incorporated.
nge made. Existing language is needed for the analysis on noval.
ent incorporated.
ent incorporated.
hanges incorporated. Least bell's vireo is not covered by d breeding bird surveys so its deletion is not incorporated. tigation Measure 4.4-9:
igation Measure 4.4-9: SCE and/or its contractors shall
acts to riparian habitat, with poles located greater than 50 from the outside of riparian corridors whenever feasible.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-178 (cont.)				the absence of a focused assessment to document the presence or absence of least Bell's vireo, construction activities near the identified drainage shall occur outside the February 1 through August 31 breeding season described in Mitigation Measure 4.4-3.	Bec con des abs abs <u>pre</u> sha sea If <u>S</u> hab <u>sea</u> <u>per</u> <u>US</u> If <u>la</u> acti to a
SCE-T-179	Chapter 4.4	4.4-42	Prior comments regarding mitigation measures and significance conclusions for the biology impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1 . In addition, as provided in comments for Chapter 3, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this DEIR, such as the access road for second source line and the potential for such facilities to cross waterways.		Waterv Withou and un
SCE-T-180	Chapter 4.4	4.4-44	Prior comments regarding mitigation measures and significance conclusions for the biology impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2 . With regard to the following statement: "Unlike the proposed subtransmission alignment, Alternative Subtransmission Alignment 2 is entirely adjacent to existing roadways." The scope described Alternative Subtransmission Alignment 2 is incomplete. For example, modification of access road east of HWY 23, as well as the pole replacement for the telecommunication component would occur in areas not adjacent to existing roadways. In addition, tree removal and/or trimming may be required for this alternative.		Comm Unl Sut exis <u>eas</u> <u>tele</u> <u>roa</u> <u>ma</u> Impact
SCE-T-181	Chapter 4.4	4.4-45	The analysis provided for Alternative Subtransmission Alignment 3 includes a conclusion that "no tree removal on Read Road between Sunset Valley Road and HWY 23 would be required." As explained in SCE's accompanying letter, an arborist report was recently prepared for portions of Read Road in order to determine the potential for tree removal. Based on the findings of that report, it is incorrect to represent that no tree removal would be necessary for Alternative Subtransmission Alignment 3 and the analysis should be updated accordingly.		As desc provide Append require roads id require place a describ road ald engined require Based o descrip follows Alto

<u>cause If</u> impacts to riparian habitat would be avoided <u>occur</u>, npensatory mitigation is not required <u>shall be required as</u> <u>acribed in Mitigation Measure 4.4-6b</u>. Additionally, in the sence of a focused assessment to document the presence or sence of least Bell's vireo, <u>this species shall be presumed</u> <u>sent and</u> construction activities near the identified drainage <u>all occur outside the February 1 through August 31 breeding</u> son described in Mitigation Measure 4.4-3.

<u>SCE plans to locate facilities within 250 feet of riparian</u> <u>bitat at this location during the least Bell's vireo breeding</u> <u>son, a habitat assessment for least Bell's vireo shall be</u> <u>formed at this location and findings coordinated with the</u> <u>FWS to determine the need for the full eight-survey protocol.</u> <u>east Bell's vireo are identified during surveys, construction</u> <u>ivities at this location must occur outside the breeding season</u> <u>avoid impacts to this species.</u>

ways would not be impacted if lines span sensitive habitat. at some detail about the crossings the impact is speculative known. Text updated to reflect new facilities.

ent incorporated. Text has been revised as follows:

like the proposed subtransmission alignment, Alternative otransmission Alignment 2 is <u>entirely mostly</u> adjacent to sting roadways; <u>however</u>, <u>modification of access roads located</u> t of Highway 23 and pole replacement for the ecommunication component are not adjacent to existing dways. In addition, some tree removal and/or tree trimming y be required for this alternative.

4.4-8 was also added. See Response A14-30 in Section 3.2.

acribed in Response SCE-T-70, based on data responses ed by SCE subsequent to receipt of this comment letter (see dix H), Alternative Subtransmission Alignment 3 would not e construction of a Hilfiker retaining wall. Widening of access identified for pole removal and installation would not be ed under this alternative as the 16 kV poles would remain in and would accommodate the telecommunication line, as bed above. Some additional widening and grading of the access long the 66 kV underground alignment may be necessary if eering determines existing access roads do not meet standards ed for construction equipment.

on changes to the Alternative Subtransmission Alignment 3 tion, the impact analysis for this alternative has been revised as s:

ernative Subtransmission Alignment 3

Construction-related impacts associated with this alternative may be similar to the Proposed Project<u>, though the impacts of</u> below grade construction on tree health viability is not <u>known</u>. However, no <u>No</u> pole replacement or <u>related</u> construction would be required between the intersection of Sunset Valley Road and Read Road and the substation. As a

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-181 (cont.)					
SCE-T-182	Chapter 4.4	4.4-45	Regarding the following statement under Alternative Subtransmission Alignment 3 , "However no pole replacement or construction would be required between the intersection of Sunset Valley Road and Read Road and the substation." As detailed in SCE accompanying letter, the scope described for Alternative Subtransmission Alignment 3 is incomplete. For example, the telecommunications line east of HWY 23 to the substation would not be installed in the duct bank but rather installed on existing wood distribution poles and may necessitate the removal and replacement of existing poles. Additionally, the telecommunications lines west of HWY 23 may also necessitate the removal and replacement of existing poles. Additionally, a Hilfiker wall and widening of access roads east of HWY 23 may be required	I 1 e	No tex 181.
SCE-T-183	Chapter 4.4	4.4-45	As detailed SCE's accompanying cover letter, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternati Substation Site B.	e ive	Comm The ge to the Su co im Ac wi res be spu rea bia in the sig alt

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result. no tree removal along read Road Road between Sunset Valley Road and Hwy 23 would be required. Based on the Certified Arborist's Assessment prepared for the Proposed Project, impacts to trees on Read Road between Sunset Valley Road and Highway 23 would similarly not conflict with local policies and ordinances protecting trees. The report does not identify the number, size and type of trees that would be affected by below grade construction; thus a direct comparison between the number of trees that would be trimmed or removed under the Proposed Project to the number of trees that would experience root damage or require removal under Alternative Subtransmission Alignment 3 is not available. However, like the Proposed Project, SCE has committed to complying with local ordinances pertaining to tree removal and modifications, including obtaining permits consistent with the conditions of the local agencies. Such compliance would ensure there is no impact pursuant to CEQA.

Construction of access roads and removal of 13 avocado trees east of Hwy 23 would not be required. Below grade construction would be similar to the Proposed Project.

ext changes necessary. See Responses SCE-T-70, and SCE-T-

nent incorporated as follows:

he Alternative Substation Site B is located within a similar eographic setting to that of the Proposed Project; however, due the previous development of Alternative Substation Site B, ere are fewer biological resources present. Because Alternative ubstation Site B is fully developed and landscaped, onstruction and operation at this location would have fewer pacts to biological resources than the Proposed Project. ctivities at this site would not affect special-status plants or ildlife species, wetlands, or other sensitive biological sources. Breeding birds that may nest in site landscaping could affected by the Proposed Project, though would not include ecial-status bird species. The longer construction duration quired for this alternative would not substantially affect ological resources, as any delay work would still need to occur such a manner that protected birds would not be impacted by e project. Other impacts are anticipated to be less than gnificant. Operation-related impacts associated with this ternative would be similar to the Proposed Project.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-184	Chapter 4.4	4.4-45	As detailed in SCE's accompanying letter, the construction activities associated with System Alternative B are estimated to be at least 18 to 36 months just for substation work alone, and this duration does not even account for additional potential work that may be needed outside the substation, such as 66 kV line reconductoring and installation of additional distribution circuits. The current analysis should be revised to account for the full scope of		Constr were f Syster EIR. S additio
			System Alternative B, especially these components that would occur outside of existing substations.		
SCE-T-185	Chapter 4.5	4.5-6	Under the heading Sites Located within the Project Area; CA-VEN-1571, the second paragraph refers to a site (CA-VEN-1778) not located in the project area. Its discussion is irrelevant to the Proposed Project.	Please remove the paragraph.	Comm In dis CA to "ar apj ali
SCE-T-186	Chapter 4.5	4.5-7	Under the heading, Native American Contact , the first paragraph on the page 4.5-7 ends with a recommendation by two Native Americans for monitoring of ground disturbing activities. For clarification, it should state that they recommend monitoring by Native Americans specifically.	Please revise as follows: "Both Ms Salazar-Folkes and Mr. Tumamait requested that ground-disturbing activities be monitored by <u>a Native American monitor</u> ."	Comm
SCE-T-187	Chapter 4.5	4.5-7	Under the heading, Phase I Archaeological Survey , paragraph two ends with the statement that no new cultural resources were recorded within the project area during the 2008 survey. It should be noted that, there was one isolate recorded (P-56-100199).	Please revise as follows: "No new cultural resources were recorded within the project area. Other than an isolated mano, no new cultural resources were recorded within the project area. As an isolated artifact, the mano is not eligible for listing in the California Register and is not considered a historic resource or unique archaeological resource under CEQA."	The m alterna
SCE-T-188	Chapter 4.5	4.5-7	Under the heading, Phase I Archaeological Survey , when the term "relocated" is used for the first time in the cultural resources section, please add a footnote to clarify that the term relocation does not refer to moving a cultural resource, but rather refers to the subsequent verification of a previously identified cultural resource.	Please add a footnote as follows: " <u>The term "relocated" refers to</u> <u>field verification in 2008 of a previously identified cultural</u> <u>resource</u> ."	The re <u>Th</u> <u>ide</u>
SCE-T-189	Chapter 4.5	4.5-13	Under the heading, Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please revise as follows: " <u>CPUC General Order No. 131-D explains</u> that local land use regulations would not apply to the Proposed <u>Project. However, for information purposes, the following goals and</u> policies were included for informational purposes only"	See Ro
SCE-T-190	Chapter 4.5	4.5-15	Under the heading, Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please revise as follows: " <u>CPUC General Order No. 131-D explains</u> that local land use regulations would not apply to the Proposed <u>Project. However, for information purposes, the following goals and</u> policies were included for informational purposes only"	See Ro
SCE-T-191	Chapter 4.5	4.5-18	Regarding APM-PAL-01 that states a Final Report will be included in the monitoring plan. The final report will come at the end of the project. This was incorrectly worded by SCE.	Please revise as follows: "The Paleontological Monitoring Plan shall include a provision for the preparation of a final report <u>at the</u> <u>conclusion of the project</u> ."	Comm Th me inc con
SCE-T-192	Chapter 4.5	4.5-18	Under the heading, Analysis Approach , paleontological resources should be included.	Please revise as follows: "SCE would include instructions that would guide construction crews on the procedures to follow if cultural <u>or paleontological</u> resources were uncovered during construction."	Comm

ruction duration and the full scope of System Alternative B factored into further consideration of this alternative. However, n Alternative B was removed from consideration in the Final See Master Response 1, *Alternatives* in Section 3.1.1 for onal information.

nent incorporated as follows:

2003, a cultural deposit, later designated CA-VEN-1778, was scovered during trenching at a housing development south of A-VEN-1571 (W & S Consultants, 2003). The site was subject Phase II archaeological testing and was proposed as being ncillary" to CA-VEN-1571. <u>Site CA-VEN-1778 is located</u> proximately 600 feet south of the proposed subtransmission gnment.

nent incorporated.

nano was not located within the current project area or atives.

equested footnote was added with the following text: <u>ne term "relocated" refers to field verification of a previously</u> <u>entified cultural resource</u>.

esponse SCE-T-6.

esponse SCE-T-6.

nent incorporated as follows:

the Paleontological Monitoring Plan shall also include a final conitoring report. The Paleontological Monitoring Plan shall clude a provision for the preparation of a final report at the nclusion of the project.

nent incorporated.

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-193 (Chapter 4.5	4.5-19	Under the heading Impact 4.5-1 , it should be clarified in the second paragraph, if construction uncovers previously unknown intact archaeological deposits, the treatment and discovery plan would not be able to define an action to "avoid" the impact that already occurred.	Please revise as follows: "would define appropriate actions to lessen or avoid <u>additional</u> impacts to site CA-VEN-1571."	Comme
SCE-T-194 (Chapter 4.5	4.5-19	Under the heading Impact 4.5-1 , it should be noted in the third paragraph, more than one TSP will be placed into the site under several of the alternatives.	Please revise as follows: "Impacts to the site could result from excavation during installation of the new TSPs."	Comme
SCE-T-195	Chapter 4.5	4.5-20	 Regarding Mitigation Measure 4.5-1: (a). Mitigation Measure 4.5-1 refers to two plans, a Cultural Resources Treatment Plan and a Discovery Plan. Since Mitigation Measure 4.5-2b covers the Discovery Plan, references to this plan should be deleted from Mitigation Measure 4.5-1. (b). Mitigation Measure 4.5-2a already addresses monitoring activities for the project; therefore, this language is redundant and should be deleted. 	Please revise as follows: "A qualified archaeologist shall be retained to serve as lead archaeologist and shall prepare a Cultural Resources Treatment and Discovery Plan prior to issuance of a grading permit. The Cultural Resources Treatment and Discovery-Plan shall address the implementation of protective measures (as detailed in APMs CUL-2 through CUL-5), archaeological monitoring, and procedures for discovery of cultural resources. The Cultural Resources Treatment and Discovery Plan shall provide detailed plans for data recovery for those components of eligible resource CA-VEN-744 that cannot be avoided during project implementation, and for the capping of those portions of site CA- VEN-744 that may be indirectly impacted. The plan shall also address the creation of Environmentally Sensitive Areas within sites CA-VEN-744 and CA-VEN-1571. The Cultural Resources Treatment and Discovery Plan shall also state that if significant portions of either site are encountered during project implementation outside of protected areas, Proposed Project redesign should be considered in order to avoid impacts to significant areas. If avoidance is infeasible, then data recovery shall be implemented. The Cultural Resources Treatment and Discovery Plan shall detail the duration and locations of archaeological and Native American monitoring during project implementation and shall provide for discretionary modifications to monitoring procedures by the lead archaeologist based on observations made by the monitor as construction progresses. The Cultural Resources Treatment and Discovery Plan shall also create measures for the accidental diseovery of archaeological resources during project implementation."	The Cu docume should
SCE-T-196	Chapter 4.5	4.5-21	Regarding Mitigation Measure 4.5-2a and 4.5-2b , both mitigation measures refer to individual components of a single plan; one is monitoring (covered by Mitigation Measure 4.5-2a), and one is discovery (covered by Mitigation Measure 4.5-2b). Therefore, the language that refers to discovery in Mitigation Measure 4.5-1 has been deleted and moved to this mitigation measure. In addition, this mitigation measure should be revised to include references to the Cultural Resource Treatment and Discovery Plan and to clarify the use of a Chumash Native American representative as a Native American monitor.	Please revise as follows: "Prior to issuance of a grading permit, an archaeological monitor shall be retained by SCE and/or its contractors to monitor all ground disturbing activities, including grading, excavation, vegetation clearance and grubbing, and implementation of cultural resources protective measures (i.e. site capping, pad construction). The procedures for monitoring shall be outlined in the Cultural Resources Treatment and Discovery Plan as described in Mitigation Measure 4.5-1, and shall include provisions for discretionary modifications to monitoring procedures by the lead archaeologist based on observations made by the monitor as construction progresses. The Archaeological Monitoring and Unanticipated Discovery Plan shall detail the duration and locations of archaeological and Native American monitoring during project implementation and shall provide for discretionary modifications to monitoring procedures by the lead archaeologist based on observations made by the monitor as construction progresses.	See Re NAHC

CPUC Response

ent incorporated.

ent incorporated.

Cultural Resources Treatment and Discovery Plan is one nent. The mitigation measures as written make sense and d not be revised.

sponse SCE-T-195. The monitor would be selected from the list provided for the Proposed Project.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-196 (cont.)				The monitor shall be a qualified archaeologist and shall work under the supervision of an archaeologist who meets the Secretary of the Interior's professional qualification standards for archaeology. In the event that cultural resources are unearthed during ground- disturbing activities, the archaeological monitor shall be empowered to halt or redirect ground disturbing activities away from the vicinity of the find so that the find can be evaluated.	
				Due to the sensitivity of the project area for Native American resources, at least one Native American monitor shall also monitor ground-disturbing activities in the project area, including the implementation of protective measures and data recovery. <u>SCE will</u> retain the services of a Chumash Native American representative to <u>conduct monitoring activities for the project</u> . Selection of monitors shall be made from the Native American Heritage Commission list provided for the Project."	
SCE-T-197	Chapter 4.5	4.5-21	With respect to Mitigation Measure 4.5-2b , the mitigation measure language was revised because Mitigation Measure 4.5-1 covers the Cultural Resource Treatment Plan.	Please revise as follows: "If unanticipated archaeological resources are encountered at any point during Proposed Project implementation, SCE and/or its contractors shall cease all activity within 50 feet of the find until the find can be evaluated by a qualified archaeologist. If the archaeologist determines that the resources may be significant, and if avoidance is determined to be infeasible, the archaeologist shall notify the lead agency and shall follow procedures outlined in the Cultural Resources Treatment and Discovery Plan (Mitigation Measure 4.5-1), in consultation with the lead agency and with appropriate Native American representatives (if the resources are prehistoric or Native American in nature) follow the procedures adopted in the Archaeological Monitoring and Unanticipated Discovery Plan. This includes ceasing activity around the discovery at an appropriate distance to ensure no further impacts to the resource and consultation with the Lead Agency and other stakeholders."	See So
SCE-T-198	Chapter 4.5	4.5-23	Under the heading, Impact 4.5-4 , the first paragraph incorrectly references Mitigation Measure 4.5-3 and should instead be referencing Mitigation Measure 4.5-4.	Please revise as follows: "However, with implementation of Mitigation Measure 4.5- 3 4, in conjunction with Mitigation Measures 4.5-1 through 4.5-2b, and APMs CUL-1 through CUL-7, this impact would be reduced to less than significant."	Comm
SCE-T-199	Chapter 4.5	4.5-23	Regarding Mitigation Measure 4.5-4 , SCE has no authority to enforce the requirements of PRC 5097.98. While the reference to this code section can remain in the document, the cited language should be deleted from this mitigation measure. Additionally, include clarification to the language of the mitigation measure with respect to halting all work.	Please revise as follows: "If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work <u>in the vicinity of the find</u> , contact the Ventura County Coroner to evaluate the remains, and follow the procedures and protocols set forth in §15064.5 (e)(1) of the CEQA Guidelines. If the County coroner determines that the remains are Native American, SCE shall contact the NAHC, in accordance with Health and Safety Code §7050.5, subdivision (c), and PRC5097.98 (as amended by AB 2641). Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains."	Comm

CPUC Response CE-T-195. nent incorporated. nent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-200	Chapter 4.5	4.5-24	Prior comments regarding mitigation measures for the cultural resources impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1 .		No cha Respon
SCE-T-201	Chapter 4.5	4.5-25	Prior comments regarding mitigation measures for the cultural resources impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2 .		No cha Respon
SCE-T-202	Chapter 4.5	4.5-26	Prior comments regarding mitigation measures for the cultural resources impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3 .		No cha Respon
SCE-T-203	SCE-T-203 Chapter 4.5	4.5-26	Prior comments regarding mitigation measures and significance conclusions for the cultural resources impacts analysis would be equally applicable to Alternative Substation Site B .		Comme follows Wit
			Regarding Alternative Substation Site B, it is explained that impacts for this alternative are less than the Proposed Project. Such a conclusion is unsupported by the information provided in the DEIR. In particular, it appears that some of the assumptions relied upon in analyzing the cultural resources impact of Alternative Substation Site B do not consider the additional extensive ground disturbance required as part of this alternative. Not only would additional ground disturbance be required for the demolition activities necessary to remove the sheriff station infrastructure, SCE believes that a substantial amount of additional grading may be required outside of already disturbed areas at the site. Therefore, the DEIR's assumption that there would be less resource sensitivity at the alternative site simply because it has been somewhat developed does not account for resources that could be affected by this full scope of ground disturbance activities. As a result, the DEIR's conclusion that cultural resources would be less impacted by Alternative Substation Site B than by the Proposed Project site is not valid. Therefore, the analysis should be revised to take into consideration the full scope of Alternative Substation Site B.		B h resc Alta dev for stati be r How wou to A othe
SCE-T-204	Chapter 4.5	4.5-27	Under the heading Alternative Substation Site B , please clarify the impacts being referred to and mitigated are related to construction only.	Please revise as follows: "With respect to CEQA criterion (c), the paleontological setting for Alternative Substation Site B is similar to that of the Proposed Project. As a result, <u>construction</u> impacts to paleontological resources would be similar to those for the Proposed Project. However, implementation of Mitigation Measure 4.5-3would mitigate <u>construction</u> impacts to paleontological resources to a less-than-significant level (Class II). Operation and maintenance of Alternative Substation Site B would not impact paleontological resources."	Comme
SCE-T-205	Chapter 4.5	4.5-27	 Regarding System Alternative B, it should be noted that the existing facilities are historic in age (Thousand Oaks Substation was built in 1960 and Royal Substation was built in 1964). The potential impacts associated with the substation modifications, as detailed in SCE's accompanying letter, were not considered in the analysis. Additionally, as detailed in SCE's accompanying letter, there would be work necessary outside the substation footprint (e.g., reconductoring, telecommunication lines, potential pole relocation, and distribution circuits), which could have the potential to encounter cultural resources. Ground disturbance activities associated with this work are not considered in this analysis. The analysis should be updated to consider the full scope of System Alternative B. 		The eff System footprin Howev in the E addition

CPUC Response

nge made. Mitigation measures will not be revised. See nses SCE-T-195 through 197.

nge made. Mitigation measures will not be revised. See nses SCE-T-195 through 197.

nge made. Mitigation measures will not be revised. See nses SCE-T-195 through 197.

ent incorporated. The text has been revised on Page 4.5-26 as s:

th respect to CEQA criterion (b), Alternative Substation Site has a slightly lower similar sensitivity for archaeological burces than compared to the Proposed Project. No cultural burces have been recorded within the vicinity of the ernative Substation Site B, which is located on an already reloped area. However, ground disturbance would be required the demolition activities necessary to remove the sheriff ion infrastructure, in addition to additional grading that may required outside of already disturbed areas at the site. wever, since Since construction of the alternative substation uld require ground-disturbing activities, construction related Alternative Substation Site B could impact buried or erwise obscured cultural resources.

ent incorporated.

fects of ground disturbance associated with construction of a Alternative B, including disturbance outside the substation nt, were factored into further consideration of this alternative. ver, System Alternative B has been removed from the analysis EIR. See Master Response 1, *Alternatives* in Section 3.1.1 for nal information.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-206	Chapter 4.6	4.6-1	Under the heading, 4.6 Geology, Soils, Seismicity and Mineral Resources, please update the last sentence to refer to subtransmission lines not transmission lines.	Please revise as follows: "in the project area (proposed substation site and <u>sub</u> transmission lines)"	Comme
SCE-T-207	Chapter 4.6	4.6-1 & 4.6-3	Under the heading, Project Area Geology and Earthquake Mechanisms and Fault Activity , the reference to late Holocene deposits incorrectly identifies the time period as 10,000 years ago to present. It should be 11,000 years ago to present.	Please revise as follows: "These deposits are late Holocene (10,000 <u>11,000</u> years ago to present), alluvial materials, comprised of consolidated gravel, sand and silt in active or recently active streambeds."	Comme
				Please revise as follows: "An <i>active</i> fault is defined by the State of California as a fault that has had surface displacement within Holocene time (last 10,000 <u>11,000</u> years)."	
SCE-T-208	Chapter 4.6	4.6-11	Under the heading, Local , please clarify that all references to local land use regulations are included for informational purposes only. Therefore please remove the text from under the heading <i>Ventura County General Plan</i> and place it under the heading Local .	Please provide the following clarification: " <u>CPUC General Order</u> <u>No. 131-D explains that local land use regulations would not</u> <u>apply to the Proposed Project. However for informational</u> <u>purposes, the following goals and policies identified in the</u> <u>Ventura County, City of Thousand Oaks, City of Simi Valley</u> <u>General Plan would otherwise be relevant to the Proposed Project</u> <u>and Alternatives:</u> "	See Res
SCE-T-209	Chapter 4.6	4.6-19	Under the heading Impact 4.6-4 , geologic reconnaissance and more current geologic maps by Dibblee, dated 1992 and 1993, do not indicate the presence of landslides at the substation site or along the subtransmission route.	Please revise as follows: "The CGS Seismic Hazard Zones map identifies the southern portion of the proposed Presidential Substation site as an area susceptible to earthquake-induced landslides (CDMG, 1997a, updated 2001). According to the PEA, this feature was likely a surficial slide associated with friable sandstone of the Sespe Formation (SCE, 2008, citing Webber, 1984). Additionally, the CGS mapped an area of potential earthquake-induced landslides near the subtransmission alignment along Read Road between Sunset Valley Road and Hwy 23. Based on the geology in that area, the <u>potential for an earthquake-induced landslide is appears</u> associated with Conejo Volcanics geologic unit. While these areas are mapped as susceptible to earthquake induced slope failure, it does not necessarily mean that <u>a landslide is present</u> <u>at these locations or that</u> a failure would occur during a future earthquake. The project specific design-level geotechnical study would evaluate the areas of identified <u>and/or potential</u> slope instability that appear to hinder project construction, operation, or maintenance and provide recommendations for slope stabilization structures, <u>if necessary</u> . Slope stabilization methods could include soil conditioning, re-contouring, or slope removal and replacement. Slope stability assessment and development of slope reinforcement methods would be an element of geotechnical evaluation performed by SCE as a preconstruction activity. Given that the areas of potential earthquake-induced landslides would be reviewed <u>evaluated</u> during the design level geotechnical study and stabilized <u>if necessary</u> , prior to construction, this impact would be less than significant."	Text an Bas asso are doe futu stuc inst mai stra stru soil repl rein eva that <u>eva</u> (<u>if r</u> sigr
SCE-T-210	Chapter 4.6	4.6-22	Under the heading Alternative Subtransmission Alignment 1 , the need for stabilization or structural reinforcement will be evaluated and further detailed upon final engineering and additional geotechnical evaluation. As provided in comments for Chapter 3 of this DEIR, the scope described in Alternative Subtransmission Alignment 1 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.	Please revise as follows: "Based on recommendations of the geotechnical engineer or engineering geologist, either the slope would may require stabilization or structural reinforcement requirements would may be necessary for the subtransmission facilities."	Comme

ent incorporated.

ent incorporated.

sponse SCE-T-6.

nended as follows:

sed on the geology in that area, the landslide <u>potential</u> appears ociated with Conejo Volcanics geologic unit. While these areas mapped as susceptible to earthquake-induced slope failure, it es not necessarily mean that a failure would occur during a are earthquake. The project specific design-level geotechnical dy would evaluate the areas of identified and/or potential slope tability that appear to hinder project construction, operation, or intenance and provide recommendations for slope stabilization tegies or reinforcement requirements for subtransmission ctures, if necessary. Slope stabilization methods could include conditioning, re-contouring, or slope material removal and lacement. Slope stability assessment and development of slope forcement methods would be an element of the geotechnical luation performed by SCE as a preconstruction activity. Given t the areas of potential earthquake-induced landslides would be luated during the design level geotechnical study and stabilized necessary) prior to construction, this impact would be less than nificant.

ent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-211	Chapter 4.6	4.6-23	Under the heading Alternative Subtransmission Alignment 2 , the following statement is inaccurate: "no new or improved access roads would be necessary, there would be a lesser need for geotechnical support structures such as retaining walls and engineered fill" as modification of access roads east of HWY 23 would be required. As provided in comments for Chapter 3 of this DEIR, the scope described in Alternative Subtransmission Alignment 2 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		Text an The gra nec stru <u>mo</u> nec
SCE-T-212	Chapter 4.6	4.6-23	Under the heading Alternative Subtransmission Alignment 3 , the following statement is inaccurate: "no pole replacement would possibly reduce the need for geotechnical evaluation of pole foundations" because the telecommunication line east and west of HWY 23 may require removal and replacement of poles. As detailed in SCE's accompanying letter, the scope described in Alternative Subtransmission Alignment 3 is incomplete. For example, it appears that a Hilfiker wall and widening of access roads east of HWY 23 could be required in order to fully construct this alternative alignment. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		No tex
SCE-T-213	Chapter 4.6	4.6-23	Under the heading Alternative Subtransmission Alignment 3, geologic reconnaissance and more current geologic maps by Dibblee, dated 1992 and 1993, do not indicate the presence of landslides at the substation site or along the subtransmission route.	Please revise as follows: "As Alternative Subtransmission Alignment 3 would be underground from the corner of <u>Sun Sunset</u> Valley Road and Read Road, slope stabilization evaluation of the <u>mapped potential</u> earthquake-induced landslide site on Read Road may not be required."	Comm
SCE-T-214	Chapter 4.6	4.6-23	Regarding Alternative Substation Site B, as detailed in SCE's accompanying letter, the scope described for this alternative is incomplete. For example, in order to accommodate the substation footprint, an approximately 16 foot high retaining wall would need to be constructed at the top of the existing slope (generally in the area currently used for overflow parking) and additional grading would be required. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		The tex approp
SCE-T-215	Chapter 4.6	4.6-23	Under the heading Alternative Substation Site B , the need for more excavation and hillside cut slopes will be evaluated and further detailed upon final engineering and additional geotechnical evaluation.	Please revise as follows: ", Alternative Substation Site B is not in an area mapped as a landslide hazard area and would <u>may</u> require more excavation and hillside cut slopes."	Comm
SCE-T-216	Chapter 4.6	4.6-24	Regarding System Alternative B , as detailed in SCE's accompanying letter, the scope described for this alternative is incomplete. Development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. Due to existing topography, additional grading activities would be required at Thousand Oaks Substation to create a site that would support suitable foundations for the infrastructure associated with this alternative. The current analysis should be revised to account for the full scope of System Alternative B.		The fu for cor footpri alterna from th <i>Alterna</i>
SCE-T-217	Chapter 4.7	4.7-7	Under the heading Impact 4.7-1 , the analysis provides quantification of GHG emission for the proposed project. As mentioned in the comments for Chapter 4.3 Air Quality, the calculations associated with construction equipment emissions have been updated by SCE and those updates are being provided by SCE with this comment package. Accordingly, the calculation of GHG emissions should be updated to correspond with those new calculations.		As desirevised revised Impact constru emission of the

CPUC Response
mended as follows: he need for seven pull and tension sites may require additional ading however, as no new or improved access roads are cessary, there would be a lesser need for geotechnical support fuctures such as retaining walls and engineered fill., and odification of access roads east of Hwy 23 could also be cessary.
xt change required. See Response SCE-T-70.
nent incorporated.
xt has been amended to include additional details as priate to better reflect the scope of this alternative.
nent incorporated.
all scope of System Alternative B, including the potential instruction of new facilities outside existing facility ints, was factored into further consideration of this ative. However, System Alternative B has been removed he analysis in the EIR. See Master Response 1, <i>atives</i> in Section 3.1.1 for additional information.
scribed in response to SCE-T-150, the CPUC reviewed SCE's d construction emission estimates and has determined that the d emission estimates are adequate and the Draft EIR t 4.7-1 discussion has been updated to reflect the revised uction emission estimates. It should be noted that the revised ons do not change the significance conclusion related to any GHG emissions impacts.
Comment

SCE-T-218
SCE-T-219
SCE-T-220

ne 17, 2011, the California Air Resources Board Final ation Order associated with Scoping Plan Measure H-6 for ng SF₆ emissions from gas insulated switchgear became ve. The regulation requires gas insulated switchgear owners to lly report their SF₆ emissions and emission rate to the California esources Board. Therefore, the last sentence of Mitigation are 4.7-2 (see Draft EIR page 4.7-9) has been deleted as ated.

itigation Measure 4.7-2: SCE shall ensure that the circuit eakers installed at the proposed Presidential Substation have a aranteed SF₆ annual leak rate of no more than 0.5 percent by lume. SCE shall provide CPUC with documentation of mpliance, such as specification sheets, prior to installation of the cuit breakers. In addition, SCE shall annually monitor the SF₆ntaining circuit breakers at the proposed Presidential Substation the detection and repair of leaks. SCE shall annually report its esidential Substation related SF₆ emissions to the CPUC until a gulation is approved by the State of California Office of liministrative Law that approves a regulation requiring annual porting of SF₆-emissions to the CARB.

ification of emissions for each alternative is not a CEQA ement to support the comparison of alternatives (see Response Γ -153, above).

raft EIR statement that short-term construction activities could in slightly lower overall GHG emissions compared to the uction emissions that could result under the Proposed Project, is rted by the fact that compared to the proposed subtransmission nent, the Alternative Subtransmission Alignment 1 would not e existing distribution along Read Road to be relocated ground, which is much more labor intensive than attaching the ng distribution line to the new poles.

ems specific to the alternative identified in the comment were lered, and compared to the proposed relocation of distribution ground along Read Road. The opinion of CPUC staff continues hat short-term construction activities under the alternative result in slightly lower overall emissions.

ification of emissions for each alternative is not a CEQA ement to support the comparison of alternatives (see Response Γ -154, above).

this alternative, the additional equipment hours required to y an access road would likely be offset by the elimination of ed for relocation of the overhead distribution 16 kV line. On ee, construction emissions under Alternative Subtransmission ment 2 could be slightly less compared to the Proposed et. No revisions are necessary.

ding the need to replace existing poles under the alternative for loading, subsequent to submittal of the commenter's letter, berformed a wind loading study for the existing poles that tes that the wooden poles can accommodate the load. fore, Alternative Subtransmission Alignment 2 would not e replacement poles due to wind loading concerns.

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision
SCE-T-221	Chapter 4.7	4.7-9	Under the heading Alternative Subtransmission Alignment 3, the following statement is unsupported: "short term construction activities could result in slightly lower overall GHG emissions compared to the construction emissions that would result under the Proposed Project" as there is no quantification of construction emissions. In addition, there is a failure to account for the emissions associated with 1) Hilfiker wall and widening of access roads east of HWY 23, 2) potential replacement of existing poles subject to windloading for the telecommunications components, and 3) potential grading of existing topography and construction of access roads, retaining wall(s) and a construction pad to support subtransmission line installation adjacent to HWY 23.	Quantif requirer SCE-T- As state short-te Alignm because overhea requirer some ac would I overhea distribu under A compar Regard wind Io require Respon
SCE-T-222	Chapter 4.7	4.7-10	Under the heading Alternative Substation Site B , the following statement is unsupported: "short term construction activities would result in similar overall GHG emissions compared to the construction emissions that would result under the proposed Presidential Substation" as there is no quantification of construction emissions. This is especially true given the significant amount of demolition work and cut and fill activities required for a suitable substation site. In addition, there is a failure to account for the emissions associated with the construction of the new approximately 16 foot retaining wall.	Quantif required SCE-T- As disc provide would H substan would H provide 16 foot The and other ci earthwo volume that the extensit the grad Both si may red substati negligil Site B v associa use, wh require constru result in constru
SCE-T-223	Chapter 4.7	4.7-10	Under the heading System Alternative B , the following statement is unsupported: "short term construction activities could result in substantially less GHG emissions compared to the construction emissions that would result under the Proposed Project" as there is no quantification of construction emissions. As detailed in SCE's accompanying letter, the scope described for System Alternative B for evaluation of air quality impacts is	GHG e of Syste breaken Howev Final E details.

CPUC Response

fication of emissions for each alternative is not a CEQA ment to support the comparison of alternatives (see Response -154, above).

ed on Draft EIR pages 4.7-9 and 4.7-10, it is anticipated that erm construction activities under Alternative Subtransmission nent 3 could be slightly less compared to the Proposed Project e the double circuit overhead line and the relocation of the ad distribution line east of Sunset Valley Road would not be d. In addition, the equipment hours required for widening of ccess roads, and potential grading of existing topography likely be offset by the elimination of the need for the proposed ad double circuit 66 kV line and relocation of the overhead tion 16 kV line. On balance, construction GHG emissions Alternative Subtransmission Alignment 3 could be slightly less red to the Proposed Project. No revisions are necessary.

ing the need to replace existing poles under the alternative for bading, Alternative Subtransmission Alignment 3 would not replacement poles due to wind loading concerns (see use SCE-T-220, above).

fication of emissions for each alternative is not a CEQA ment to support the comparison of alternatives (see Response -156, above).

cussed in Response SCE-24 (see Section 3.4.2), SCE did not e an estimate of the graded cut and fill volume amounts that be associated with the alternative for direct comparison to the ntial fill volume (i.e., 40,000 cubic yards of imported soil) that be required for the proposed substation site and does not e any assumptions for comparison related to construction of the wall or the site access road.

alysis in the Draft EIR considered the topography, layout, and ircumstances at the alternative site and it was determined that ork at the alternative site would require less total cut and fill compared to the Proposed Project. Therefore, it is assumed fill activities associated with the proposed site would be more ve and would require additional equipment hours compared to ding activities that would be required at the alternative site. tes would require an access road, and although a taller wall quire additional hours to complete compared to the proposed ion wall, the associated difference in emissions would be ble. Although the development at the Alternative Substation would require complete demolition of all existing structures ted with the previous Ventura County Sherriff's Department nen considering the additional equipment hours that would be d under the Proposed Project related to fill activities, short-term ction activities under Alternative Substation Site B would n similar total overall GHG emissions compared to the ction emissions that would result for the proposed Presidential ion. No revisions are necessary.

emissions and air quality impacts associated with construction em Alternative B, including the potential need for new circuit rs, were factored into further consideration of this alternative. eer, System Alternative B was eliminated from analysis in the EIR. See Master Response 1, *Alternatives* in Section 3.1.1, for

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-223 (cont.)			incomplete as it does not address a number of components that would be required in order to develop this alternative. It also fails to address the additional circuit breakers required at each of the substations as well as the likely need to import fill to the Thousand Oaks Substation in order to create a suitable site to implement the modified design of the substation.		
SCE-T-224	Chapter 4.8	4.8-1	Under the heading, 4.8 Hazards and Hazardous Materials, EMF information is already covered in Chapter 2 Section 2.10. Further, it should not be covered in the Hazardous Materials section since EMF is not a hazard in the context of CEQA.	Please revise as follows: "The CPUC generally provides information about electric and magnetic fields (EMF) in its environmental documents, including this EIR, to inform the public and decision makers. However, the CPUC does not consider EMF, in the context of CEQA, as an environmental impact because there is no agreement among scientists that EMF creates a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMF. Information about EMF generated by transmission lines is provided in Chapter 2, Project Description, and in Appendix B."	Comm the tex subject
SCE-T-225	Chapter 4.8	4.8-5	Under the heading, Wood Treatment Products , please note SCE would like to clarify that it would be removing approximately 89 existing wood poles, not more than 90 poles as referred to in the text.	Please revise as follows: "More than 90 <u>Approximately 89</u> existing subtransmission and 16 kV distribution wood poles would be removed from the proposed subtransmission alignments."	Comm
SCE-T-226	Chapter 4.8	4.8-5	Under the heading, Schools and Daycare Facilities , it is noted that the Tutor Time facility is located approximately 300 feet northeast of the Proposed Presidential Substation site. SCE's PEA (page 4-108) indicated the same facility was located 700 feet northeast of the Proposed Presidential Substation site. Furthermore, Table 4.13-1 and the text on page 4.13-4 of this DEIR references the distance as 400 feet from the substation site.	Please include location references for the measurement (e.g. substation perimeter wall to wall of Tutor Time facility) and clarify any discrepancy.	The ref substat propert in Draf relative
SCE-T-227	Chapter 4.8	4.8-10	Under the heading Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please insert the following under the Local heading: " <u>CPUC</u> <u>General Order 131-D explains that local land use regulations</u> would not apply to the Proposed Project, Accordingly, the <u>following discussion of local land use regulations is provided for</u> <u>informational purposes only."</u>	See Re
SCE-T-228	Chapter 4.8	4.8-17	With respect to Mitigation Measure 4.8-1b , which requires SCE to prepare a Hazardous Substance Control and Emergency Response Plan during construction, operations and maintenance to ensure compliance with applicable federal, state and local laws and guidelines regarding the handling of hazardous materials. As a result, these specific bullet points underneath the general introductory paragraph of Mitigation Measure 4.8-1b are duplicative of already applicable law and therefore unnecessary. In addition, the current language within these bullet points is unclear, as it contains a number of inconsistencies with the introductory paragraph. For example, whereas the introductory paragraph states that the Hazardous Substance Control and Emergency Response Plan shall be submitted "prior to commencement of construction activities," the bullet points speak to plans that shall be developed prior to operations of the Proposed Project. In addition, it is unclear whether this mitigation measure would require SCE to submit one plan as titled above or three separate plans that are identified in the three respective bullet points. Therefore, the three bullet points should be removed from the contents of the mitigation measure.	Remove the bullet points titled Hazardous Materials and Hazardous Waste Handling, Transport of Hazardous Materials, and Emergency Response Procedures, as well as associated text.	The sp paragra applica accords Transp three re emerge identifi the Haz that wo the con bullets constru The fir has bee
					The fir has bee

ent noted. Draft EIR text not changed as after consideration t was intended to inform readers of the CPUC policy on this t.

ent incorporated.

eference points for the stated measured distance are: the tion property perimeter and the Tutor Time Child Care Center rty line (see Draft EIR Figure 2-9a). The reference to 400 feet ft EIR Table 4.13-1 and text on Draft EIR page 4.13-4 is re to the proposed substation wall (see Draft EIR Figure 2-4).

sponse SCE-T-6.

becific bullet points underneath the general introductory raph of Mitigation Measure 4.8-1b are not duplicative of able law. Bullets one and two would be implemented in lance with OSHA standards or U.S. Department of portation and Caltrans regulations, respectively, and bullet requires personnel to be aware of the local, State, and federal ency response reporting guidelines. To clarify, the items fied in Mitigation Measure 4.8-1b are to be addressed within azardous Substance Control and Emergency Response Plan ould be submitted to CPUC for review and approval prior to mmencement of construction activities. The first and third s of the measure have been revised to clearly indicate that preuction compliance would be required.

st sentence of the first bullet in Mitigation Measure 4.8-1b en revised as follows:

Hazardous Materials and Hazardous Waste Handling: A project operations-specific hazardous materials management and hazardous waste management program shall be developed prior to <u>construction operations</u> of proposed Presidential Substation project.

st sentence of the third bullet in Mitigation Measure 4.8-1b en revised as follows:

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-228 (cont.)					•
SCE-T-229	Chapter 4.8	4.8-19	Under the heading, Impact 4.8-3 , it is noted that the Tutor Time facility is located approximately 300 feet northeast of the Proposed Presidential Substation site. SCE's PEA (page 4-108) indicated the same facility was located 700 feet northeast of the Proposed Presidential Substation site. Furthermore Table 4.13-1 and the text on page 4.13-4 of this DEIR references the distance as 400 feet from the substation site.	Please include location references for the measurement to clarify the discrepancy (e.g. substation perimeter wall to wall of Tutor Time facility).	See Re
SCE-T-230	Chapter 4.8	4.8-19	With respect to Mitigation Measure 4.8-2 which requires SCE's Hazardous Substance Control and Emergency Response Plan (as requested in Mitigation Measure 4.8-1b) to include provisions for dealing with subsurface hazardous materials, the mitigation content requested in this measure should be combined with the text of Mitigation Measure 4.8-1b as both mitigations are addressing requirements of the same plan and it is redundant and not necessary to create mitigation measures that refer to other mitigation measures.		The co with M becaus conten need to
SCE-T-231	Chapter 4.8	4.8-20	Regarding the analysis for Impact 4.8-4 , please include a figure that displays the location of the private air strip in the Tierra Rejada Valley for evaluation of the potential impacts and reasonableness of the mitigation measure.		The co airstrip figure inform includi airstrip PEA p accura
SCE-T-232	Chapter 4.8	4.8-20	Regarding Mitigation Measure 4.8-3 that references implementation of Mitigation Measures 4.8-1a through 1e and 4.8-2. It is unnecessary and redundant to create mitigation measures that reference implementation of other mitigation measures. Therefore, Mitigation Measure 4.8-3 should be removed.	Remove mitigation measure 4.8-3 and replace with Mitigation Measures 4.8-1a through 1e and 4.8-2.	The co with M Althou CPUC 4.8-3 v
SCE-T-233	Chapter 4.8	4.8-21	Regarding Mitigation Measure 4.8-4 that requests written notification be provided to the two private air strips within the vicinity of the Proposed Project, there is no state requirement outlining the requirements of such a notification to private air strips. SCE suggests modifications to the content of the mitigation measure to meet the same intent, as well as delete the portion of the mitigation measure that references information already contained in this DEIR.	Please revise as follows: "Mitigation Measure 4.8-4: SCE shall provide written notification to the Ventura County Sheriff Department and the land owner of the Tierra Rejada Valley landing strip stating when new subtransmission line and poles would be erected. SCE shall also provide the Sheriff Department and the landing strip owner with recent aerial photos or topographic maps clearly showing the location of the new lines and poles. The photos or maps shall also indicate the heights of the poles and conductors. SCE shall provide documentation of compliance to the CPUC."	The co becaus such a applica the rec sugges
SCE-T-234	Chapter 4.8	4.8-21	Regarding Mitigation Measure 4.8-5 that references implementation of Mitigation Measures 4.15-1b. It is unnecessary and redundant to create mitigation measures that reference implementation of other mitigation measures. Therefore, Mitigation Measure 4.8-3 should be removed.	Please remove mitigation measure 4.8-5 and reference mitigation measure 4.15-1b.	The co and Mi there is becaus
SCE-T-235	Chapter 4.8	4.8-21	Under the heading Impact 4.8-5 , the roadways mentioned in the first sentence are public roadways therefore it is unclear which private roadways the sentence is referring to.	Please revise as follows: "Several private and Public roadways, including Sunset Valley Road, Moorpark Road, and Madera Road that, as well as several private roadways would be crossed by the Proposed Presidential Substation project"	Comm

CPUC Response

Emergency Release Response Procedures: An Operations Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to Substation <u>construction operational</u> activities.

sponse SCE-T-226.

ommenter requests that Mitigation Measure 4.8-2 be combined Aitigation Measure 4.8-1b to avoid redundancy. However, se the commenter does not appear to take issue with the at of Mitigation Measures 4.8-2 or 4.8-1b, CPUC staff sees no o combine the two measures.

ommenter requests a figure to illustrate the location of the p in the Tierra Rejada Valley. CPUC staff does not have a available that maps the location of the airstrip; however, the nation in the Impact 4.8-4 discussion on the subject airstrip, ing the distance from the subtransmission line route to the p, was obtained from SCE's environmental assessment (see hage 4-108) on the Proposed Project, and was found to be the to assess project impacts.

ommenter requests that Mitigation Measure 4.8-3 be replaced Aitigation Measures 4.8-1a through 4.8-1e, and 4.8-2. agh parts of Mitigation Measure 4.8-3 may be redundant staff has not identified a need to replace Mitigation Measure with the subject mitigation measures.

ommenter suggests changes to Mitigation Measure 4.8-4 se there is no State requirement outlining the requirements of a notification to private airstrips. However, the absence of an able State requirement in itself is not adequate justification for commended revisions to Mitigation Measure 4.8-4. The sted revisions have not been incorporated.

ommenter requests that Mitigation Measure 4.8-5 be removed litigation Measure 4.15-1b should be referenced. However, as no need to remove Mitigation Measure 4.8-5 for this purpose se it requires implementation of Mitigation Measure 4.15-1b.

nent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-236	Chapter 4.8	4.8-22	Regarding Mitigation Measure 4.8-6 , it would seem appropriate that coordination with CalFire and applicable local fire departments to determine the appropriate amounts of fire equipment to be carried on construction vehicles (if determined necessary) and the need for any additional water resources at the site (e.g. water trucks or tanks) would be sufficient for mitigating any potential impact. As such the mitigation measure should be revised.	Please revise as follows: "Mitigation Measure 4.8-6: SCE and/or its contractors shall have water tanks and/or water trucks sited/available at active project sites for fire protection. All construction and maintenance vehicles shall have fire suppression equipment. Construction personnel shall be required to park vehicles away from dry vegetation. Prior to construction, SCE and its-contractors shall contact and coordinate with the California Department of Forestry (CalFire) and applicable local fire departments (i.e., Ventura County) to determine the appropriate amounts of fire equipment to be carried on the vehicles, <u>if necessary</u> and appropriate locations for the water tanks if water trucks are not used <u>secondary water sources</u> (e.g. water trucks or tanks), <u>if necessary</u> . SCE shall submit verification of its consultation with CalFire and the local fire departments to the CPUC."	The co sugges sugges
SCE-T-237	Chapter 4.8	4.8-24	Prior comments regarding mitigation measures and significance conclusions for the hazards and hazardous materials impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1 . In addition, as provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		For ress signific Respon The ad Subtrat discuss Propos acciden mobili interfe hazard
SCE-T-238	Chapter 4.8	4.8-24	Prior comments regarding mitigation measures and significance conclusions for the hazards and hazardous materials impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2 . The following statement is inaccurate: "unlike the proposed subtransmission alignment, Alternative Subtransmission Alignment 2 is entirely adjacent to existing roadways." Potential modification of access roads east of HWY 23, as well as the potential pole replacement for the telecommunication component, would occur in areas not adjacent to existing roadways. As provided in comments for Chapter 3 of this DEIR, the scope described in Alternative Subtransmission Alignment 2 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		For res signific Respon The re Althou to exis accura Regard telecon comme existin the loa not req Consid SCE fo change hazard under t
SCE-T-239	Chapter 4.8	4.8-24	Prior comments regarding mitigation measures and significance conclusions for the hazards and hazardous materials impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3 . The following statement is inaccurate: "however no pole replacement or construction would be required between the intersection of Sunset Valley Road and Read Road and the substation." The telecommunication line east		For res signific Respon Regard telecor comme

ommenter does not give adequate justification to support the sted edits to Mitigation Measure 4.8-6. Therefore the sted changes are not made.

sponses to comments related to mitigation measures and cance conclusions for hazards and hazardous materials, see nses SCE-T-228 through SCE-T-236.

dditional scope items identified by SCE for Alternative unsmission Alignment 1 do not warrant a change to the impact sion because they would result in the same impacts as the sed Project in regard to routine use of hazardous materials, ental release of hazardous materials, the release and ization of previously unidentified residual contamination, erence with an adopted emergency response plan, and fire ds. No revisions are necessary.

sponses to comments related to mitigation measures and icance conclusions for hazards and hazardous materials, see nses SCE-T-228 through SCE-T-236.

efferenced statement is in regards to the alternative alignment. ugh there may be a need for access roads that are not adjacent sting roads, the statement regarding the alternative alignment is ite.

ding the need to replace existing poles for the mmunication component, subsequent to submittal of the enter's letter, SCE performed a wind loading study for the ng poles that indicates that the wooden poles can accommodate ad. Therefore, Alternative Subtransmission Alignment 2 would guire replacement poles for the telecommunication component.

deration of the additional applicable scope items identified by or Alternative Subtransmission Alignment 2 do not warrant a e to the impact discussion; impacts related to hazards and lous materials would be similar to those that would occur the Proposed Project. No revisions are necessary.

sponses to comments related to mitigation measures and icance conclusions for hazards and hazardous materials, see nses SCE-T-228 through SCE-T-236.

ding the need to replace existing poles for the mmunication component, subsequent to submittal of the enter's letter, SCE performed a wind loading study for the

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-239 (cont.)			and west of HWY 23 may necessitate the removal and replacement of existing poles. Additionally, construction of a Hilfiker wall and widening of access roads east of HWY 23 may be required. As detailed in SCE accompanying letter, the scope described in Alternative Subtransmission Alignment 3 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		existing the loa not req The fo EIR pa the inte propos Ho wo Ros pro Consid SCE fo change hazard under t
SCE-T-240	Chapter 4.8	4.8-24	Under the heading Alternative Subtransmission Alignment 3 , this section does not accurately describe the alternative route, therefore the analysis for Alternative Subtransmission Alignment 3 needs to be updated to accurately reflect the potential impacts of the proposed alternative. For clarification, the alignment does follow Read Road and there is construction between the intersection of Sunset Valley and Read Road to the Presidential Substation site.		The de route in page 4 Alt loc alig Ali <u>sub</u> Althou route w analysi
SCE-T-241	Chapter 4.8	4.8-25	As provided in comments for Chapter 3 of this DEIR, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		Consid Alterna discuss would Project
SCE-T-242	Chapter 4.8	4.8-25	As detailed SCE's accompanying letter, the scope described for System Alternative B is incomplete as it does not address a number of components that would be required in order to develop this alternative. For example, the DEIR simply states that, "installing larger transformers could require the replacement of some existing distribution equipment located inside and outside of the substation footprint." However, System Alternative B would also require substantial rebuilding of the each of the three substations, the need to reconductor the Moorpark Royal No 2 66 kV subtransmission line, installation of a new capacitor bank at Malibu Substation and the construction of additional new 16 kV distribution circuits out of each of the three substations. The current analysis should be revised to account for the full scope of System Alternative B, as it also fails to address the handling of hazardous materials associated with the rebuilding of the substations.		The fu Alterna was fac System EIR. S additio
SCE-T-243	Chapter 4.8	4.8-25	With respect to System Alternative B , the analysis applies an incorrect CEQA criterion when analyzing potential hazards impacts. The DEIR states, "Because the footprint of the System Alternative B is less than the Proposed Project and contains existing infrastructure, construction, and operational impacts would be less than the Proposed Project." The DEIR's reliance on the size of substation footprints does not appear to be relevant to the		The ful Alterna was fac System EIR. Se additio

CPUC Response

ng poles that indicates that the wooden poles can accommodate ad. Therefore, Alternative Subtransmission Alignment 3 would quire replacement poles for the telecommunication component.

blowing revisions has been made to the last sentence on Draft age 4.8-24 to clarify that no poles would be installed between ersection of Sunset Valley Road and Read Road and the sed Presidential Substation project:

owever, no pole replacement or <u>pole installation</u> construction ould be required between the intersection of Sunset Valley oad and Read Road and the proposed Presidential Substation oject.

deration of the additional applicable scope items identified by or Alternative Subtransmission Alignment 3 do not warrant a e to the impact discussion; impacts related to hazards and lous materials would be similar to those that would occur the Proposed Project. No revisions are necessary.

escription of the Alternative Subtransmission Alignment 3 in the first sentence of the last paragraph on Draft EIR 4.8-24 has been revised as follows:

ternative Subtransmission Alignment 3 is in a very similar eation to along the same route as the proposed subtransmission gnment, except: however, the underground portion of ignment 3 does not follow includes undergrounding the btransmission line along a portion of Read Road.

ugh the route description was described incorrectly, the correct was considered during the analysis. No revisions to the is are necessary.

deration of the additional scope items identified by SCE for lative Substation Site B do not warrant a change to the impact sion; impacts related to hazards and hazardous materials be similar to those that would occur under the Proposed tt. No revisions are necessary.

all range of project components associated with System hative B, including the technical aspects listed in this comment, actored into further consideration of this alternative. However, in Alternative B was removed from consideration in the Final See Master Response 1, *Alternatives* in Section 3.1.1 for bonal information.

all range of project components associated with System native B, including the technical aspects listed in this comment, actored into further consideration of this alternative. However, in Alternative B was removed from consideration in the Final See Master Response 1, *Alternatives* in Section 3.1.1 for conal information.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-243 (cont.)			significance conclusion regarding hazards and hazardous materials. Rather, the analysis should consider the CEQA significance criteria listed as items a) through h) on page 4.8-15.		
			A corrected analysis should consider elements such as the fact that System Alternative B would require the removal of existing 15 MVA transformers which currently contain mineral oil, followed by assembly and installation of the 30 MVA transformers and then filling those new transformers with mineral oil on site. This activity would occur at each of the three substations, Thousand Oaks, Potrero, and Royal, whereas with the Proposed Project, installation of 15 MVA transformers would only need to occur at the Presidential Substation. As a result, development of System Alternative B would involve the handling of 21 transformers with mineral oil, whereas the Proposed Project would only involve the handling of 2 transformers.		
			Please revise the System Alternative B analysis to accurately address the CEQA significance criteria for which the Proposed Project is being evaluated against, as opposed to simply discussing the size of the respective substation footprint.		
SCE-T-244	Chapter 4.9	4.9-12	Under the heading Construction General Permit (SWRCB 2009-09 DWQ) , the Construction General Permit has been amended and the text should be updated to reflect the amendment.	Please revise as follows: "2009-0009-DWQ <u>as amended by 2010-0014-DWQ</u> "	Comr
SCE-T-245	Chapter 4.9	13 et seq.	Under the heading Construction General Permit , the notice of Intent (NOI) is no longer used for Construction General Permit. Now, the State Board relies on an online application package called "Permit Registration Documents" (PRDs) via their database, known as "Storm Water Multiple Application and Report Tracking System" (SMARTS). Please undate subsequent references to NOI to PRDs throughout the section	Please revise as follows: "Dischargers are required to submit a Notice of Intent (NOI) Permit Registration Documents (PRDs) via the SWRCB's database, known as "Storm Water Multiple Application and Report Tracking System" (SMARTS) in order to, at the discretion of the SWRCB and the LARWQCB, obtain coverage under the Construction General Permit."	Comr
SCE-T-246	Chapter 4.9	13	Under the heading Construction General Permit , the third paragraph notes the complete list of "compliance items" would not necessarily apply to every project. Some may not apply to Presidential, depending on the project's risk level that will be determined when the Risk Analysis (Risk Determination) and SWPPP are prepared.	Please revise as follows: "The permit contains several compliance items that may apply to a project depending on that site's characteristics, including:"	Comr Th a j <u>m</u>
SCE-T-247	Chapter 4.9	4.9-22	Under the heading Mitigation Measure 4.9-1 , please revise the mitigation measure to reflect the access road design and drainage specifications to be consistent with SCE access road design.	Please revise as follows: " Mitigation Measure 4.9-1: For all segments of new or improved access roads that would be within 300 feet of an existing surface water channel (i.e., one that has a distinct bed and banks, including irrigation ditches where no berm/levee is currently in place) and traverse a ground slope greater than two percent, the following protective measures shall be adhered to and/or installed: All access roads shall be <u>in</u> out-sloped; Cross drains (road surface drainage, e.g., waterbars, rolling dips, or channel drains) shall be installed at intervals based upon the finished road slope: road slope 5 percent or less, cross drain spacing shall be 150 feet; road slope 6 to 15 percent, cross drain spacing shall be 75 feet; and 21 to 25 percent, cross-drain spacing shall be 50 feet Cross-drains (road surface drainage, e.g., waterbars, rolling dips, or channel drains) shall be installed at intervals based upon the finished road slope: road slope 5 percent or less, cross drain spacing shall be 150 feet; road slope 6 to 15 percent, cross-drain spacing shall be 75 feet; and 21 to 25 percent, cross-drain spacing shall be 50 feet	One a ditche mitiga With contro specif docum erosic are ba erosic Chapt access specif study This r applic feet o

ment incorporated.

ment incorporated.

ment incorporated. Text revised as follows:

he permit contains several compliance items that may apply to project depending on that site's characteristics (some of which hay not be applicable depending on project site characteristics), including:

addition to the mitigation measure regarding the use of in-board es was incorporated. Otherwise, this change is rejected and the ation measure generally stays the same.

respect to maintaining the natural drainage pattern and olling erosion, out-sloped roads are generally superior. The fications in the mitigation measure are based on extensive mented analyses regarding road designs that limit drainage and on issues. The original specifications in the mitigation measure ased upon published work done with respect to forest roads and on (mainly the Weaver and Hagans citation in Draft EIR ter 4.9, *Hydrology and Water Quality*). While the proposed as roads are not "forest," the cited work and recommended fications are still valid because the recommendations from the r can be applied to non-forest roads as well.

measure does not apply to the design of *all* access roads; it es only to roads (or sections of roads) that are 1) within 300 f a channel and 2) would have a slope greater than 2 percent.

nitigation measure is amended as follows:

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-247 (cont.)				cross-drain spacing shall be 600 feet; road slope 5 to 10 percent, cross-drain spacing shall be 400 feet; road slope 10 to 15 percent, cross-drain spacing shall be 200 feet; and road slope 15 percent and above, cross-drain spacing shall be 100 feet;	•
				Energy dissipation features (e.g., rock rip-rap, or a rock-filled container) shall be installed at all cross-drain outlets; and	
				<u>Typically</u> no new or improved road segments with finished slopes greater than 25 percent."	
SCE-T-248	Chapter 4.9	4.9-23	Under the heading Impact 4.9-2 , please include the updated language to clarify alternate methods that could be used instead of dewatering for pole settings as previously communicated to the Commission. While dewatering may be implemented for portions of the proposed project, please include the revised language to clarify the method to be used.	Please revise as follows: "The proposed excavations (up to 60 feet) could encounter groundwater in select locations, in which case dewatering would may be necessary used. As discussed above, groundwater within the project area could be as shallow as 15 to 35 feet bgs. Where the groundwater table is relatively shallow, some groundwater seepage may occur into pole excavation or auger holes requiring which could require dewatering. on a one-time basis immediately prior to pole placement and installation. As an alternative method instead of dewatering, the hole may be stabilized with drilling mud slurry. If this technique is used, mud slurry would be placed in the hole after drilling to prevent the sidewalls from sloughing. The concrete for the foundation is then pumped to the bottom of the hole, displacing the mud slurry. The mud slurry brought to the surface is typically collected in a baker tank or vacuum truck adjacent to the foundation, and then pumped out to be reused, or discarded at an off-site disposal facility in accordance with all applicable laws. For the Proposed Project, if dewatering is <u>used</u> required for pole placement, it would be accomplished be by setting well points around the work area which are tied to manifold and pump. The water would <u>could</u> then be discharged to a sediment tank and, after adequate residence time for settling of sediments and other solids, subsequently discharged into the local storm drain or sewer system consistent with an y applicable permits and regulations."	Text rev Whe grou auge imm <u>may</u> dewa slurr pum The vacu facil
SCE-T-249	Chapter 4.9	4.9-23	Under the heading Impact 4.9-2 , the LARWQCB has discretion regarding how a dewatering discharge will be permitted. It could fall under several different orders. Those most likely are the one listed SWRCB Order 2003- 0003-DWQ or LARWCB Order R4-2008-0032, Discharges of Groundwater from Construction Dewatering to Surface Waters.	Please revise as follows: "SCE shall apply and comply with SWRCB Order 2003 0003 DWQ SCE shall apply and comply with a dewatering permit"	Text was SCF <u>Ord</u> <u>inel</u> plar
SCE-T-250	Chapter 4.9	4.9-24	Under the heading Mitigation Measure 4.9-2 , please revise the third bullet point in order to reflect that other methods of discharge may be used, other than discharging to a community sewer system.	Please revise as follows: "If discharging to a community sewer system is <u>used feasible or necessary</u> "	Text is If dinect
SCE-T-251	Chapter 4.9	4.9-27	Prior comments regarding mitigation measures and significance conclusions for the hydrology and water quality impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1 . The scope described Alternative Subtransmission Alignment 1 is incomplete. For example, the second source line would require a new access road and the potential for such facilities to cross waterways. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		Text re The the <u>a ne</u> dev rela subt

CPUC Response

In-board ditches may be used to control/convey water seepage from cut slopes. If used, in-board ditches shall be lined with rock rip-rap and (the slope shall not exceed 6 percent); vised as follows: ere the groundwater table is relatively shallow, some indwater seepage may occur into pole excavation or er holes requiring dewatering on a one time basis nediately prior to pole placement and installation which require dewatering. As an alternative method to vatering, the hole may be stabilized with a drilling mud ry. Concrete for the pole foundation would then be nped to the bottom of the hole displacing the mud slurry. mud slurry would be recovered (e.g., in a baker tank or uum truck) and either be reused or discarded at an off-site lity in accordance with all applicable laws. as amended as follows: E shall apply for and comply with the provisions of SWRCB ler 2003 0003 DWQa dewatering permit (e.g., SWRCB ler 2003-0003-DWQ or LARWQCB Order R4-2008-0032), udingas well as develop and submit a discharge monitoring (if necessary). revised as follows: ischarging to a community sewer system is feasible or essary, vised as follows: e second subtransmission line for this alternative (i.e., from Moorpark-Royal No. 2 to the Substation), which may require ew access road, would traverse land that is generally less reloped and which is characterized by more variable and tively steeper topography as compared to the proposed transmission alignment.

Comment Section	Page	Comment	Suggested Revision	
SCE-T-252 Chapter 4.9	4.9-28	The scope of Alternative Subtransmission Alignment 2 as described in the DEIR is incomplete. Among other deficiencies, the following statement is inaccurate, "no new access roads would be installed or improved as part of construction or operation of Alternative Subtransmission Alignment 2" because modification of access roads east of HWY 23, as well as the potential pole replacement for the telecommunication component would be required for this alternative. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2. In addition, prior comments regarding mitigation measures and significance conclusions for the hydrology and water quality impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2.		Comm Alu and alig in t im Su for pot the wo He she im Su Su for pot the wo He she and Ali app to t Im wo Me alig in t im Su for pot the she and alig in t im Su for pot the she and alig in t im Su for pot the she and alig in t im Su for pot the she and alig in t im Su for pot the she and alig in t im Su for pot the she and alig in t im Su for pot the she and alig in su for she and alig in the she and alig in the she and alig in su sec she and alig in su sec she and alig in su sec she and alig in su sec and alig in su su sec she and alig in su su sec she and alig in su su su su su su su su su su su su su
SCE-T-253 Chapter 4.9	4.9-28	As detailed in SCE's accompanying letter, the scope described Alternative Subtransmission Alignment 3 is incomplete. For example, the following statement is inaccurate, "no new access roads would be installed or improved as part of construction or operation of Alternative Subtransmission Alignment 3" because modification of access roads east of HWY 23, potential pole replacement for the telecommunication component, and installation of a construction pad to support the subtransmission line adjacent to HWY 23 would be required for this alternative. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3. In addition, prior comments regarding mitigation measures and significance conclusions for the hydrology and water quality impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3.		See Ra Ali hyd sul Ali ali op sin ali wa Su pro dif No of Ali <u>of</u> <u>ma</u> <u>roa</u> equ sec eli be

nent incorporated in text as follows:

ternative Subtransmission Alignment 2 has a similar hydrology water quality setting as the proposed subtransmission gnment, and Alternative Subtransmission Alignment 2 is similar scope to the proposed subtransmission alignment. The potential pacts resulting from construction and operation of Alternative btransmission Alignment 2 would be similar to those identified the proposed subtransmission alignment. In general, the tential impacts to hydrology and water quality resulting from e implementation of Alternative Subtransmission Alignment 2 ould be the same as for the proposed subtransmission alignment. wever, some differences in the extent of the potential impacts buld be noted. No new access roads would be installed or proved as part of construction or operation of Alternative stransmission Alignment 2. Therefore, the potential erosion and imentation risks related to road installation or improvement uld likely be eliminated, and the implementation of Mitigation asure 4.9 1 would not be necessary. However, land-clearing grading activities associated with Alternative Subtransmission ignment 2 may disturb a larger gross area due to the need for proximately seven additional pull and tension sites as compared the proposed subtransmission alignment.

plementation of Alternative Subtransmission Alignment 2 puld not likely warrant additional or different mitigation easures than those required for the proposed subtransmission gnment. Therefore, Mitigation Measures <u>4.9-1</u>, 4.9-2 and 4.9-3 puld also <u>likely</u> be required for Alternative subtransmission ignment 2 and the potential impacts of this alternative to drologic resources and water quality would be less than gnificant (Class II).

esponse SCE-T-70. Comment incorporated as follows:

ternative Subtransmission Alignment 3 has a similar drology and water quality setting as the proposed btransmission alignment, and Alternative Subtransmission ignment 3 is similar in scope to the proposed subtransmission gnment. The potential impacts resulting from construction and eration of Alternative Subtransmission Alignment 3 would be nilar to those identified for the proposed subtransmission gnment. In general, the potential impacts to hydrology and tter quality resulting from the implementation of Alternative btransmission Alignment 3 would be the same as for the oposed Subtransmission alignment. However, some ferences in the extent of the potential impacts should be noted.

o new access roads would be installed or improved as part construction or operation of Alternative Subtransmission ignment 3, although some additional widening and grading the access road along the 66 kV underground alignment by be necessary if engineering determines existing access adds do not meet standards required for construction <u>uipment.</u> Therefore, the potential erosion and limentation risks related to road installation <u>would be</u> <u>minated</u>, and impacts from road improvement would likely less than under the Proposed Project. or improvement

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-253 (cont.)					wo Mit Wo me alig 4.9 Sut alte less
SCE-T-254	Chapter 4.9	4.9-29	Prior comments regarding mitigation measures and significance conclusions for the hydrology and water quality impacts analysis would be equally applicable to Alternative Substation Site B.		No cha to the o
SCE-T-255	Chapter 4.9	4.9-29	As detailed in SCE's accompanying letter, the scope described for System Alternative B is incomplete as it does not address a number of components that would be required in order to develop this alternative. For example, the following statement is inaccurate, "System Alternative B would be much smaller in scope as compared to the Proposed Project," as System Alternative B would require substantial rebuilding at each of the three substations, the need to reconductor the Moorpark-Royal No. 2 66 kV subtransmission line, installation of a new capacitor bank at Malibu Substation and the construction of additional new 16 kV distribution circuits out of each of the three substations. The current analysis should be revised to account for the full scope of System Alternative B.		The fui Alterna was fao System See Ma inform
SCE-T-256	Chapter 4.10	4.10-1	Under the heading Proposed Presidential Substation , as previously mentioned in the Executive Summary, reference to the 4 acre substation site should be revised to 5.4 acres	Please revise as follows: "The 4 <u>5.4</u> -acre substation <u>site</u> footprint would be built in presently undeveloped land"	See Re
SCE-T-257	Chapter 4.10	4.10-1	Under the heading Proposed Presidential Substation , the description of the existing setting is incomplete, as it should include the land use to the west and north of site.	Please include language to identify that the existing land use to the west and north of the site is open space.	Comm
SCE-T-258	Chapter 4.10	4.10-1	Under the heading Proposed Subtransmission Alignment , regarding the reference to ROW, please clarify the ROW is road ROW.	Please revise as follows: "The proposed subtransmission alignment would be located predominantly within <u>road</u> ROW currently being used for 16 kV distribution."	Comm
SCE-T-259	Chapter 4.10	4.10-1	Regarding the footnote at the bottom of the page, related to text under the heading Proposed Subtransmission Alignment , additional land rights other than potential overhang easements could be required for access roads, and the subtransmission line east of HWY 23, therefore the footnote should be removed.	Please revise as follows: " 1 While some areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross arms, the Proposed Project would not require additional ground surface ROW."	This for Project WH Rot acc req add
SCE-T-260	Chapter 4.10	4.10-2	Under the heading Proposed Subtransmission Alignment , it should be clarified that the subtransmission line on Sunset Valley Road does not "cross" but is adjacent to the mentioned existing land uses.	Please revise as follows: "Along Sunset Valley Road, the proposed subtransmission alignment would eross <u>be adjacent to</u> lands that are being used for agriculture, open space, and rural residential development."	Comm
SCE-T-261	Chapter	4.10-3	Under the heading Alternative Substation Site B, an existing setting should be included for this site		Comm
	4.10		For example, surrounding land uses include, to the south of Olsen Road, commercial and agricultural, to the west of the site, open space. To the north, west, and east of the site is open space.		The app Ma the

CPUC Response uld likely be eliminated, and the implementation of tigation Measure 4.9-1 would not be necessary. plementation of Alternative Subtransmission Alignment 3 buld not likely warrant additional or different mitigation asures than those required for the proposed subtransmission gnment. Therefore, Mitigation Measures 4.9-1, 4.9-2 and -3 would also <u>likely</u> be required for Alternative otransmission Alignment 3 and the potential impacts of this ernative to hydrologic resources and water quality would be s than significant (Class II). ange necessary. Existing language is inclusive of the additions description of Alternative Substation Site B. Ill range of project components associated with System ative B, including the technical aspects listed in this comment, ctored into further consideration of this alternative. However, Alternative B has been eliminated from analysis in the EIR. aster Response 1, Alternatives in Section 3.1.1 for additional ation. sponse SCE-T-1. ent incorporated. ent incorporated. potnote has been revised to match the text from Chapter 2, Description: hile some Some areas along Sunset Valley Road and Read ad could require additional overhang easement rights to commodate pole cross-arms, the Proposed Project would not uire additional ground surface ROW and may require litional easement rights depending on the final engineering. ent incorporated.

ent incorporated as follows:

e Alternative Substation Site B would be located on an proximate 2.3-acre parcel of land located on the north side of idera Road in the City of Simi Valley. The parcel is owned by City of Simi Valley and previously housed the Ventura

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-261 (cont.)					Co con non
SCE-T-262	Chapter 4.10	4.10-3	Under the heading System Alternative B , an existing setting should be included for each of the substation sites.		The ex further comm receive Final I
SCE-T-263	Chapter 4.10	4.10-3	Under the heading Local , please clarify that all references to local land use regulations are included for informational purposes only.	Please insert the following under the Local heading: " <u>CPUC</u> <u>General Order 131-D explains that local land use regulations</u> would not apply to the Proposed Project, Accordingly, the following discussion of local land use regulations is provided for informational purposes only."	See Re
SCE-T-264	Chapter 4.10	4.10-11	Under the heading City of Simi Valley Municipal Code: Zoning Districts, the reference to a conditional use permit should be revised to include the source from which the information is coming from. It should also be reiterated that because of GO 131-D, a conditional use permit would not be required for the Proposed Project as it is considered a discretionary permit.	Please revise as follows: " <u>According to the City of Simi Valley</u> <u>Municipal Code</u> , "a conditional use permit is required"	Comm
SCE-T-265	Chapter 4.10	4.10-13	Under the heading Proposed Subtransmission Alignment and other general references to "existing ROW" in this section of the document, please clarify existing ROW refers primarily to existing road ROW currently being used for 16 kV distribution.	Please revise as follows: "The alignment would be located within existing ROW primarily existing road ROW"	Comm
SCE-T-266	Chapter 4.10	4.10-13	Under the heading a); Proposed Presidential Substation , as previously mentioned in the Executive Summary, the reference to the 4 acre substation site should be revised to 5.4 acres.	Please revise as follows: "The proposed approximately 4 <u>5.4</u> -acre Substation <u>site</u> footprint could not physically divide the City of Simi Valley because it would not be constructed or operated within this city."	See Re
SCE-T-267	Chapter 4.10	4.10-13	Under the heading a); Proposed Subtransmission Alignment and other general references to "existing ROW" in this section of the document, please clarify existing ROW refers primarily to existing road ROW currently being used for 16 kV distribution.	Please revise as follows: "The alignment would be located <u>primarily</u> within the existing <u>road</u> ROW currently being used for 16 kV distribution within the City of Thousand Oaks."	Comm
SCE-T-268	Chapter 4.10	4.10-13	Under the heading a); Proposed Subtransmission Alignment , for clarification, SCE does not typically acquire "ground surface" land rights.	Please revise as follows: "Some areas along Sunset Valley Road and Read Road (in unincorporated Ventura County) could require additional overhang easement rights to accommodate pole crossarms, and could require additional ground surface ROW."	Comm
SCE-T-269	Chapter 4.10	4.10-14	Under the heading b), the third paragraph references an established utility corridor, please clarify that this refers to primarily road ROW with existing utility facilities.	Please revise as follows: "The proposed subtransmission alignment would be located in an established utility corridor within primarily road ROW with existing utility facilities"	Comm
SCE-T-270	Chapter 4.10	4.10-15	Under the heading b), after the number 4, please clarify that the subsequent discussion regarding the City of Thousand Oaks Zoning Ordinance, is included for informational purposes only.	Please revise as follows: "Although General Order No. 131-D gives the CPUC sole and exclusive jurisdiction over the siting and design of the Proposed Project, <u>therefore</u> , the following is provided for informational purposes only if the City of Thousand Oaks Zoning Ordinance applied to the Proposed Project, a conflict with the Protected Ridgeline Overlay Zone would result:"	Draft I modifi Alt the des <u>inf</u> Cit Pro Ov

inty Sheriff's Department. <u>Surrounding land uses include</u> imercial and agricultural to the south, and open space to the th, west, and east.
isting setting for System Alternative B was factored into consideration of this alternative. However, Pursuant to nts received from SCE and follow up discussions and data d, System Alternative B was eliminated from analysis in the IR. See Master Response, 3.1.3, <i>Alternatives</i> , for details.
sponse SCE-T-6.
ent incorporated.
ent incorporated.
sponse SCE-T-1.
ent incorporated.
ent incorporated.
ent incorporated.
IR page 4.10-15, the first paragraph under item 4, has been ed as follows:
hough <u>As discussed above</u> , General Order No. 131-D gives CPUC sole and exclusive jurisdiction over the siting and ign of the Proposed, if <u>Project and therefore the following</u> ormation is provided for informational purposes only. If the y of Thousand Oaks Zoning Ordinance applied to the
posed Project, a conflict with the Protected Ridgeline

verlay Zone would result:

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-271	Chapter 4.10	4.10-15	Under the heading City of Thousand Oaks Zoning Ordinance: Protected Ridgeline Overlay Zone , the discussion regarding the Protected Ridgeline Overlay Zone should be deleted because there is no conflict with the City of Thousand Oaks protected ridgeline due to CPUC's preemptive jurisdiction under GO 131-D. Further, this language refers to Aesthetics, and is inapplicable in the Land Use and Planning section.	Please revise as follows: "The proposed Presidential Substation site and several of the parcels that would be traversed by the proposed subtransmission alignment would also be subject to the <i>Protected Ridgeline Overlay Zone (PR)</i> set forth in Article 35 of the City's Zoning Ordinance. Certain development standards apply within 300 feet horizontally or 100 feet vertically of the crest of a protected ridgeline; however, these standards can be modified with an approved request for a Special Use Permit. The significance of adverse impacts on the scenic vistas and natural features intended to be protected by the <i>PR</i> zoning designation would be considered by the City in evaluating such a request. As analyzed in Section 4.1, <i>Aesthetics</i> , Impact 4.1 8 concludes that the Proposed Project would cause a significant impact on visual resources by substantially degrading the existing visual character or quality of the proposed Presidential Substation site and its surroundings from public views. Even with the implementation of recommended mitigation measures, the impact would remain significant and unavoidable. Consequently, construction, operation and maintenance of the Substation would conflict with the City of Thousand Oaks's Protected Ridgeline Overlay Zone."	No char
SCE-T-272	Chapter 4.10	4.10-17	Under the heading, City of Thousand Oaks Zoning Ordinance , please insert the word "with" into the last sentence.	Please revise as follows: "Consequently, Alternative Subtransmission Alignment 2 would not conflict <u>with</u> these zoning designations."	Comme
SCE-T-273	Chapter 4.10	4.10-17	Under the heading, City of Simi Valley General Plan , please insert a conclusion sentence regarding no conflict with the general plan.	Please revise as follows: " <u>Consequently, Alternative</u> <u>Subtransmission Alignment 2 would not conflict with the general</u> <u>plan (even if it were applicable)."</u>	Comme The of tr <u>and</u> <u>not</u>
SCE-T-274	Chapter 4.10	4.10-18	Under the heading City of Simi Valley Municipal Code: Zoning Districts, after the last sentence insert language to clarify those discretionary permits are not required.	Please revise as follows: <u>"However, such permits are discretionary</u> and, because of CPUC General Order No. 131-D, would not be necessary."	This ch
SCE-T-275	Chapter 4.10	4.10-19	Under the heading City of Simi Valley Municipal Code: Zoning Districts , insert language to clarify that discretionary permits are not required.	Please revise as follows: <u>"However, such permits are discretionary</u> and, because of CPUC General Order No. 131-D, would not be necessary."	This ch
SCE-T-276	Chapter 4.10	4.10-16	The scope described for Alternative Subtransmission Alignment 1 is incomplete. For example, the second source line would require a new access road and the potential for such facilities to cross waterways. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		Comme Con Alte simi the s line subt and Espe Tier Espe gene as a subt vicin

CPUC Response

nge made. See Response SCE-T-6 above.

ent incorporated.

ent incorporated as follows:

e General Plan does not discuss the allowance or disallowance ransmission line facilities within these land use designations <u>I therefore Alternative Subtransmission Alignment 2 would</u> <u>conflict with the General Plan, even if the General Plan was</u> <u>blicable</u>.

ange is not necessary. See Response SCE-T-6.

nange is not necessary. See Response SCE-T-6.

ent incorporated as follows:

nstruction, operation and maintenance activities associated with ernative Subtransmission Alignment 1 would be the same as <u>tilar to</u> the Proposed Project. The first source line would follow same alignment as the Proposed Project. The second source e would originate at the Moorpark-Royal No. 2 66 kV transmission line near the intersection of Tierra Rejada Road Esperance Road. It would extend due south parallel to berance Road and turn east approximately 0.5 mile south of rra Rejada Road and then southeast where the alignment leaves berance Road. For 1.8 miles, the alignment would cross erally overland requiring new ROW up to 25 feet wide as well additional land rights for access that may not follow the transmission line, and a new access road. Land use in the inity of this alignment is a mix of open space and rural

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-276 (cont.)					res for 1 v Im apj by
SCE-T-277	Chapter 4.10	4.10-16 to 4.10-17	The scope described for Alternative Subtransmission Alignment 2 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		Comm Co Alt Pro fol tela wo and 23 and exi use
SCE-T-278	Chapter 4.10	4.10-17	Regarding Alternative Subtransmission Alignment 2, under the heading City of Simi Valley General Plan, a conclusion statement is missing, therefore, please insert a statement that Alternative Subtransmission Alignment 2 would not conflict with the City of Simi Valley General Plan.	Please revise as follows: "The General Plan does not discuss the allowance or disallowance of transmission line facilities within these land use designations. <u>Consequently, Alternative</u> <u>Subtransmission Alignment 2 would not conflict with the City of Simi Valley General Plan</u> ."	Comm Th of <u>and</u> <u>no</u> ap
SCE-T-279	Chapter 4.10	4.10-17 to 4.10-18	Regarding Alternative Subtransmission Alignment 2, under the heading City of Simi Valley Municipal Code: Zoning Districts , clarification that a conditional use permit would not be required should be included in the discussion.	Please revise as follows: "in the absence of General Order 131- D. <u>However, such a permit is discretionary and because of CPUC</u> <u>General Order 131-D would not be necessary.</u> "	This c
SCE-T-280	Chapter 4.10	4.10-18	 Prior comments regarding significance conclusions for the land use and planning impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3. For clarification, the City of Thousand Oaks Protected Ridgeline Overlay Zone is included in the analysis for the Proposed Project for informational purposes and no such conflict with this zone exists. As detailed in SCE's accompanying letter, the scope described for Alternative Subtransmission Alignment 3 is incomplete. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3. 		Comm Co Alt Pro <u>be</u> <u>RC</u>
SCE-T-281	Chapter 4.10	4.10-18	As detailed in SCE's accompanying letter, the scope described for Alternative Substation Site B is incomplete. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		No cha Substa the add
SCE-T-282	Chapter 4.10	4.10-18	Under the heading City of Simi Valley Municipal Code: Zoning Districts , clarification that a conditional use permit would not be required should be included in the discussion.	Please revise as follows: "in this zoning designation (City of Simi Valley, 2006). <u>However, such a permit is discretionary and,</u> because of CPUC General Order 131-D, would not be necessary."	See Re
SCE-T-283	Chapter 4.10	4.10-19	As detailed in SCE's accompanying letter, "no new facilities" as mentioned under System Alternative B is an incorrect assumption. In contrast, development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. For		Pursua and da analys Sectio

sidential with existing utility lines for a portion of the alignment the second source line. Alternative Subtransmission Alignment would not physically divide any established communities (No pact). Also like the Proposed Project, there are no HCPs or other proved governmental habitat plans that involve lands traversed Alternative Subtransmission Alignment 1 (No Impact).

nent incorporated as follows:

onstruction, operation and maintenance activities associated with ternative Subtransmission Alignment 2 would be similar to the oposed Project. <u>In addition to the subtransmission alignments</u> lowing a different route than under the Proposed Project, a ecommunication line would be required for this alternative that ould travel west from the proposed substation site under Hwy 23 d along Read Road. Modification of access roads east of Hwy could also be necessary as would some potential tree removal d/or tree trimming. Work would take place primarily within isting road ROW and would therefore not affect adjacent land es.

nent incorporated as follows:

transmission line facilities within these land use designations d therefore Alternative Subtransmission Alignment 2 would t conflict with the General Plan, even if the General Plan was plicable.

hange is not necessary. See Response SCE-T-6.

nent incorporated as follows:

onstruction, operation and maintenance activities associated with ternative Subtransmission Alignment 3 would be similar to the oposed Project. <u>Some additional groundwork and grading would required</u>, but would primarily take place within existing road <u>DW</u>.

anges are necessary pursuant to updates to the Alternative ation Site B description as the existing language is inclusive of ditional details provided.

esponse SCE-T-6.

ant to comments received from SCE and follow up discussions at received, System Alternative B was eliminated from the Final EIR. See Master Response 1, *Alternatives*, in n 3.1.1 for details.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-283 (cont.)			example, this alternative would require reconductoring of the Moorpark- Royal No. 2 66 kV line, installation of a new capacitor bank at Malibu Substation, and new distribution circuitry. The current analysis should be revised to account for the full scope of System Alternative B.		
SCE-T-284	Chapter 4.11	4.11-1	Regarding the analysis for the noise section, supporting details for the calculations are not provided. As such, the noise level calculations cannot be verified.Therefore, a technical appendix should be included.	Please provide the technical appendix to support calculations seen in the document.	The ass levels a
SCE-T-285	Chapter 4.11	4.11-1	The noise analysis does not use consistent thresholds for determining impacts (e.g. conflict with general plan policies, County methodology).	Please revise the analysis to use a uniform threshold.	The pro- unincon have di operation impacts not be a
SCE-T-286	Chapter 4.11	4.11-7	Under the heading Sensitive Receptors , please clarify the points (e.g., property line, center of property, etc.) where the measurements are taken from for references to sensitive receptor locations.		The des compor centerli
SCE-T-287	Chapter 4.11	4.11-7	 Under the heading, Proposed Project, and the remainder of the analysis for this section, please correct the spelling of Tutor Time Child Care. In addition, as mentioned in prior sections (4.8 Hazards and Hazardous Materials) the reference that the Tutor Time Child Care is 300 feet from the Proposed Substation Site is inconsistent with what SCE provided in the PEA (700 feet). Therefore, it is suggested that locational references are provided to clarify where this measurement is being taken from. Please take into consideration this comment for the full Noise section. 	Please revise as follows: "and the Tudor <u>Tutor</u> Time Child Care Center is"	Comme In addit Tutor T and the Figure
SCE-T-288	Chapter 4.11	4.11-8	Under the heading Regulatory Context , please provide clarification about the applicability of local land use regulations with respect to GO 131-D as it is applicable to Ventura County, City of Thousand Oaks and City of Simi Valley General Plan policies.	Please include the following language: " <u>CPUC General Order No.</u> <u>131-D explains that local land use regulations would not apply to</u> <u>the Proposed Project. However, for information purposes, the</u> <u>following policies have been included for reference.</u> "	Change
SCE-T-289	Chapter 4.11	4.11-13	Under the heading Impact 4.11-1 , the noise analysis presented in the first paragraph assumes positions of construction equipment in proximity to sensitive receptors. However, industry analysis assumes a speculative position for construction equipment.	Please revise this portion of the analysis to use the standards as described in cited sources (e.g. FTA 2006).	It is not stateme constru noise le position location
SCE-T-290	Chapter 4.11	4.11-12 - 15	Regarding the analysis for Impact 4.11-1, SCE has the following concerns:The analysis related to noise impacts is primarily based on potential conflicts with noise policies from general plans which are not the appropriate threshold for evaluating noise impacts as they are not applicable as noted on page 4.11-8 of this DEIR. Furthermore, Mitigation Measures $4.11-1a$ through $4.11-1b$ would not be warranted to reduce the impact to less than significant.The noise analysis presented in the first paragraph, more specifically as discussed starting on line 9, does not seem to match the County methodology identified on page $4.11-9$ of this DEIR. The County methodology calls for the determination of the hourly L_{eq} . However, the analysis seems to indicate it is based on a 10-hour L_{eq} . Additionally, this portion of the analysis incorrectly develops and applies the usage factor. A usage factor should be based on the hourly activity level of the equipment.	Please revise the analysis to use the correct methodology.	Althoug not bou has elec effects As a re- pages 4 violate cause a obligate minimi Becaus availab typical usage f

sumptions used to calculate the construction-related noise are included in Final EIR Appendix I.

oject would occur in different jurisdictions (i.e., rporated Ventura County and City of Thousand Oaks) that ifferent thresholds for evaluation of construction and on noise. Use of a uniform threshold to evaluate noise s relative to local standards, policies, and ordinances would appropriate for the Proposed Project.

scriptions of distances to sensitive receptors from project nents are relative to the project site boundary or alignment ine and the property line of the sensitive receptor.

ent incorporated.

ition, the reference points for the stated measured distance to Time Child Care Center are: the substation property perimeter e Tutor Time Child Care Center property line (see Draft EIR 2-9a).

e not made, see Response SCE-T-6.

t clear what the commenter is referring to with regard to the ent: "..., industry analysis assumes a speculative position for action equipment." In order to estimate construction-related evels at sensitive receptor locations, assumptions of the ns of construction equipment relative to the sensitive receptor ns are necessary.

gh its decision-making authority over the Proposed Project is and by local agency noise ordinance restrictions, the CPUC cted to analyze the significance of Project-related noise relative to standards that otherwise apply in the project area. esult, the conclusion of analysis of Impact 4.11-1 (Draft EIR, 4.11-13 and 4.11-14) was that construction noise would Ventura County General Plan Policy 2.16.2-1(5), and so a significant impact. CEQA Guidelines Section 15126.4(a)(1) es the CPUC to describe feasible measures that could ize significant adverse impacts.

se equipment hourly activity level information is not yet ble for the Proposed Project, the hours of operation during a 10-hour workday were used as surrogates to develop hourly factors. For clarification, the second to last sentence of the

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-290 (cont.)					first pa follow
					use tha
SCE-T-291	Chapter 4.11	4.11-13	As explained in multiple resource sections of the DEIR, CPUC GO 131-D explains that local land use regulations would not apply to the Proposed Project, therefore policies in the Ventura County General Plan would not be relevant for purposes of the analysis and references to such policies should be included for informational purposes only. This exemption is expressly noted in the Ventura County General Plan, which recognizes that State regulations preempt local regulations with respect to public utility facilities. Specifically, "State and Federal highways, all railroad line operations, aircraft in flight, and public utility facilities are noise generators having Federal and State regulations that preempt local regulations." (See page 49 of the Ventura County General Plan).	Please revise the analysis to identify the applicable noise methodology and apply those standards to the project for determining appropriate impact conclusions.	See Re
SCE-T-292	Chapter 4.11	4.11-15	Under the heading Impact 4.11-1 , the last paragraph of the analysis explains that nearly all nighttime construction activities within 1,000 feet of Ventura County sensitive receptors would continue to exceed the Ventura County General Plan construction noise threshold criteria. As discussed above, Ventura County General Plan Noise Policies would not be relevant for purposes of the analysis. In addition, there is no quantification of anticipated impacts for use in determining the magnitude of the impact for evaluation.	Please revise analysis to identify the applicable noise methodology and apply those standards to the project for determining appropriate impact conclusions. Please also provide a quantitative analysis for nighttime construction noise level.	Refer Becau propos associa used to constru
SCE-T-293	Chapter 4.11	4.11-15	As previously mentioned, the noise policy thresholds established in the Ventura County General Plan are not relevant to this project. Accordingly, Mitigation Measures 4.11-1a and 4.11-1b would not mitigate any significant impact under CEQA criterion a) for noise and should therefore be deleted. In addition, there does not seem to be any benefit associated with these mitigation measures. As noted on page 4.11-15, "it is not possible to firmly substantiate that implementation of Mitigation Measures 4.11-1a and 4.11- 1b would achieve noise reductions of more than 5 dBA." Because 5 dBA is explained to be the typical change in noise level required for any noticeable change in human response, implementation of mitigation measures that would not achieve that noticeable change should not be implemented. The analysis also does not consider potential noise impacts associated with the implementation of some aspects of the mitigation measures described in the DEIR. For example, Mitigation Measure 4.11-1b includes a provision stating that temporary noise barriers should be installed. However, installation of noise barriers may prove to be counterproductive if applied to work associated with 66 kV subtransmission lines. Most 66 kV line construction is of short duration, and installation and removal of the barriers could take longer and could produce as many or more impacts, including noise impacts, than the 66 kV work itself.	Please remove Mitigation Measures 4.11-1a and 4.11-1b under criterion a).	Refer to Also, to benefito becaus Howeve firmly 1a and (i.e., refirmly 1a and (i.e., refirmly 1a and (i.e., refirmly achieve comment Mo dat facts, of the corf barrier than co Pursua construe movea positio construe elevate subtrai 1a and
SCE-T-294	Chapter 4.11	4.11-15	Under the heading, Construction Noise Municipal Codes , the conclusion is that there would be no impact related to violations of local ordinances, however the analysis under Impact 4.11-1 explained that there was (although not quantified) a likely violation due to nighttime noise level limits. This finding is inconsistent with the prior finding.	Please revise the analysis for Impact 4.11-1 to be consistent with finding under heading Construction Noise Municipal Codes.	The ni based based with th sugges

aragraph on Draft EIR page 4.11-13 has been revised as /s:

, therefore an average hourly usage factor of 30 percent was ed to estimate the water truck L_{eq} noise levels associated with at construction activity.

esponse SCE-T-290.

to Response SCE-T-290.

se no specific nighttime construction activities are currently sed, it is not possible to quantify the noise levels that would be ated with such activities. Therefore, a qualitative analysis was o assess the noise-related impact should SCE determine that uction during nighttime is necessary.

to Response SCE-T-290.

the commenter appears to indicate that there would not be a t associated with Mitigation Measures 4.11-1a and 4.11-1b se they would not achieve a noticeable change in noise level. ver, as indicated on Draft EIR page 4.11-15, it not possible to substantiate that implementation of Mitigation Measures 4.11-14.11-1b would achieve noise reductions of more than 5 dBA eductions up to 5 dBA can be substantiated). Therefore, nentation of Mitigation Measures 4.11-1a and 4.11-1b would re a noticeable reduction in noise and so, based on the enter's own criteria, should be implemented.

ta or references offering facts, reasonable assumptions based on or expert opinion supported by facts is offered to substantiate mmenter's suggestion that installation and removal of noise rs could take longer and produce as many or more noise impacts onstruction of the proposed 66 kV subtransmission lines. ant to Mitigation Measure 4.11-1a, the shields used during linear uction activities would be required to be readily removable and able so they may be repositioned, as necessary. In addition, oning of noise shields would not involve the same intense uction activities (e.g., clearing, auguring, etc.) that generate ed noise levels as would be required to construct the nsmission source lines. Accordingly, Mitigation Measures 4.11-14.11-1b have not been removed in response to this comment.

ighttime noise level limit referenced by the commenter is on Ventura County General Plan Policy 2.16.2-1(5); it is not on a municipal code requirement. Impact 4.11-1 is consistent he findings under Construction Noise Municipal Codes. The sted revision is not necessary.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-295	Chapter 4.11	4.11-17	Under the heading Corona Noise , the last paragraph references a "37" dBA noise level at 25 feet. According to EPRI, 35 dBA is the wet conditions noise level at 25 feet from a 138 kV transmission line. For clarification, the 37 dBA is at 0 feet.	Please revise as follows: " 37 dBA <u>35 dBA</u> "	The connoise la reference are callo of the content 25 feet incorport
SCE-T-296	Chapter 4.11	4.11-18	Under the heading Corona Noise , the first paragraph references a "44" dBA noise level. However, based on the comment above, the correct dBA is 42.	Please revise as follows: "44 dBA <u>42 dBA</u> "	The su SCE-T
SCE-T-297	Chapter 4.11	4.11-19	Under the heading, Impact 4.11-4 , the analysis of temporary construction noise increase provides the predicted noise level from construction, but does not identify the existing level or the increase in noise levels	Please revise the analysis to provide the existing noise level and the increase so the impact from the increase can be determined.	The foi on Dra noise le levels a <u>As</u> <u>levels</u> <u>ide</u> <u>rec</u> <u>The</u> <u>are</u> <u>abc</u>
SCE-T-298	Chapter 4.11	4.11-19 to 4.11-20	Under the heading, Impact 4.11-4 , it is concluded that the Proposed Project construction activities would not result in a substantial increase in noise levels, however "construction noise levels would likely be perceived as a nuisance" and therefore, could potentially result in significant impacts. The perception of nuisance (which the DEIR also terms annoyance) is subjective, and was not identified as an impact threshold and such a conclusion is not supported by the analysis that is provided. Therefore, Mitigation Measure 4.11-4 should be removed as it is proposed to mitigate annoyance. Additionally, the analysis related to the FTA L_{eq} level should be removed as it is not relevant to the significance conclusion for this impact. The CEQA criterion for impact 4.11-4 asks whether there would be a substantial increase in "existing" ambient noise levels. The noise levels identified by the FTA as generally related to community reaction are not appropriately considered under this criterion, as they do not relate to actual existing ambient noise levels.	Please update the analysis to provide a quantification of the temporary increase above ambient noise levels. Remove references to perceived nuisance and annoyance as these are not directly related to the criterion being evaluated.	Refer t In addi page 4 signific be con levels Imp cor noi <u>sho</u> signific
SCE-T-299	Chapter 4.11	4.11-21	Under the section 4.11.5 Alternatives, a quantification of the construction noise levels related to each of the alternatives should be included within the analysis to substantiate the conclusions regarding significance as well as comparison to the level associated with Proposed Project.		Per CE about e analysi examir the ana of nois suppor with th compo
SCE-T-300	Chapter 4.11	4.11-21	Regarding Subtransmission Alignment 1 , SCE's prior comment related to significant unavoidable short term construction impacts within unincorporated Ventura County would be equally applicable here. Additionally, SCE's prior comment related to mitigation measures would also be applicable.		Refer t above.

CPUC Response

ommenter appears to have misinterpreted the referenced EPRI level information. As stated on page 63 of EPRI, 1978, the need noise levels are associated with conductors at 30 feet and leulated at approximately 5 feet above the ground. The x axis chart reflects distance from the centerline, not distance from nductor. Therefore, the referenced noise level 0 feet from the line reflects a location directly below the line, approximately t from the conductor. The suggested revision has not been porated.

nggested revision has not been incorporated. See Response T-295.

ollowing paragraph has been added before the last paragraph aft EIR page 4.11-19 to provide a comparison of the existing levels in the project area to the estimated construction noise at sensitive receptor locations.

s shown in Tables 4.11-1 and 4.11-2, daytime ambient noise vels in the project area average between 43 and 64 dBA. onsidering the estimated noise levels at sensitive receptors entified in Table 4.11-5, ambient noise levels at those sensitive ceptors could be increased by between 0 dBA and 34 dBA. erefore, some of the existing sensitive receptors in the project ea would experience a temporary increase in noise levels ove those existing without the Proposed Project.

to Response SCE-T-297 above.

lition, the last sentence of the second paragraph on Draft EIR 4.11-12 has been revised as shown below to clarify that the icance of short-term increases in ambient noise levels would asidered to result in a significant impact if the increased noise would result in an adverse community reaction.

pacts were assessed by comparing the modeled noise levels of nstruction equipment and operational activities to applicable ise regulations, and/or the ambient noise environment, and ort-term increases in ambient noise levels would be considered mificant if the increased noise levels would result in an verse community reaction.

EQA Guidelines Section 15126.6(d), sufficient information each alternative is required to allow a meaningful evaluation, is, and impact comparison; however, CEQA allows for nation of an alternative's impacts at a lesser level of detail than alysis of a proposed project's impacts. Therefore, quantification se levels for each alternative is not a CEQA requirement to rt the comparison of alternatives. The noise impacts associated ne alternatives were assessed qualitatively by comparing the onents of the Proposed Project to the various alternatives.

to Responses SCE-T-285, and SCE-T-289 through SCE-T-294

Comment	Section	Page	Comment	Suggested Revision
SCE-T-301	Chapter 4.11	4.11-22	 With respect to Alternative Subtransmission Alignment 2, the following statement, "unincorporated Ventura County residents would not be impacted under this alternative" is incorrect because the scope described for Alternative Subtransmission Alignment 2 is incomplete. For example, modification of access road east of HWY 23, as well as the pole replacement for the telecommunication component would occur within the boundaries of Ventura County, and this activity would likely be in close proximity to sensitive receptors in Ventura County. In addition, prior comments regarding mitigation measures and significance conclusions for the noise impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2. 	SCE H modifi necess specifi need t unsub or pos reside Regar wind I perfor that th Altern replac There necess In add SCE-7
SCE-T-302	Chapter 4.11	4.11-22	Prior comments regarding mitigation measures and significance conclusions for the noise impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3.	Refer above
SCE-T-303	Chapter 4.11	4.11-23	With respect to Substation Site B , the analysis appears to understate potential noise impacts since it does not account for additional grading that would be required in order to prepare the site for substation construction. Prior comments regarding mitigation measures and significance conclusions for the noise impacts analysis would be equally applicable to Alternative Substation Site B.	Refer Respo
SCE-T-304	Chapter 4.11	4.11-23	With regard to the discussion Construction Impacts under the heading "System Alternative B, SCE notes that the DEIR contains the following statement: "it is anticipated that construction period for each of the substations would be substantially shorter than the construction period that would be associated with the proposed Presidential Substation." Actually, as explained in SCE's accompanying letter, the construction activities associated with System Alternative B are estimated to be at least 18 to 36 months just for substation work alone, and this duration does not even account for additional potential work that may be needed outside the substation, such as 66 kV line reconductoring and installation of additional distribution circuits.	The converse of System See M
			With regard to operation impacts on page 4.11-24, SCE notes that the DEIR contains the following statement, "Assuming that the new larger transformers would have twice the sound pressure level of the existing transformers, the associated CNEL would be approximately 55 dBA." This assumption is not supported by any evidence or details regarding noise levels associated with the size of the transformers established in System Alternative B. In addition, although the DEIR establishes Mitigation Measure 4.11-SAB-1 to limit operational noise from the new transformers, it cannot be verified that it is technically feasible to achieve compliance with County of Ventura standards as required in that mitigation measure. For example, because of space limitations at the these existing substations, it may not be possible to locate the new transformers with substantial setbacks from existing residential properties. SCE also cannot verify whether transformer manufacturers can equip transformers with sound attenuation devices that would reduce noise levels to meet county standards. Accordingly, the DEIR's conclusion that impacts associated with this alternative would be mitigated to less than significant is not supported by substantial evidence.	

as not provided adequate information regarding the ication of access roads east of Highway 23 that could be sary under Alternative Subtransmission Alignment 2. Without ics, such as which access roads, and what road locations, the o modify access roads east of Highway 23 appears to be merely stantiated speculation, and it would therefore not be appropriate spible to determine whether unincorporated Ventura County nces would be impacted by such modifications.

rding the need to replace existing poles under the alternative for loading, subsequent to submittal of the commenter's letter, SCE rmed a wind loading study for the existing poles that indicates ne wooden poles can accommodate the load. Therefore, native Subtransmission Alignment 2 would not require cement poles due to wind loading concerns.

fore, revisions to the referenced Draft EIR statement are not sary.

lition, refer to Responses SCE-T-285, and SCE-T-289 through Γ -294 above.

to Responses SCE-T-285, and SCE-T-289 through SCE-T-294

to Response SCE-24 in Section 3.4.2. In addition, refer to onses SCE-T-285, and SCE-T-289 through SCE-T-294 above.

onstruction period and noise effects for System Alternative B factored into further consideration of this alternative. However, m Alternative B was eliminated from analysis in the Final EIR. Iaster Response 1, *Alternatives* in Section 3.1.1 for details.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-305	Chapter 4.12	4.12-1	Under the heading 4.12 Population and Housing , paragraph 1 states "Project construction would also involve a temporary marshalling yard in the City of Moorpark or the City of Santa Clarita." Please clarify that a marshaling yard could be located in other jurisdictions.	Please revise as follows: " <u>SCE anticipates that</u> project construction would <u>could</u> also involve a temporary marshalling yard in the City of Moorpark, <u>City of Thousand Oaks</u> or City of Santa Clarita."	Comm
SCE-T-306	Chapter 4.12	4.12-2	Regarding Table 4.12-2 , the last column on the right states that the data is "% Change 2015-2035." The table and numeric data reflect a percent change from 2020 to 2035. Please revise the column to reflect the correct time period.	Please revise the table to indicate the correct time period for the percent change $\frac{(2015-2035)}{(2020-2035)}$.	Comm
SCE-T-307	Chapter 4.12	4.12-4	Under the heading Impact 4.12-1 , the first paragraph includes two references to a "utility corridor." As previously mentioned, "utility corridor" is not the correct term.	Please revise as follows: "The proposed subtransmission alignment would be within an established <u>utility corridor primarily</u> <u>existing road ROW containing overhead utilities</u> , which would continue to be used as a utility corridor for utilities."	Comm
SCE-T-308	Chapter 4.12	4.12-5	Criterion b) includes a reference to a "utility corridor." As previously mentioned, "utility corridor" is not the correct term.	Please revise as follows: "The proposed subtransmission alignment would be constructed within 3.5 miles of an existing <u>overhead</u> <u>utility ROW utility corridor</u> , generally paralleling local and County roads as well as traversing open space and agricultural areas."	Comm
SCE-T-309	Chapter 4.12	4.12-6	As provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis.		The up do not
			The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		
SCE-T-310	Chapter 4.12	4.12-6	As provided in the comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 2 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		The up do not
SCE-T-311	Chapter 4.12	4.12-6	As detailed SCE's accompanying cover letter, Alternative Subtransmission Alignment 3 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		No cha Subtran inclusi
SCE-T-312	Chapter 4.12	4.12-7	As detailed SCE's accompanying cover letter, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		Draft E Cor Alta Pro the an a the con be I add <u>Site</u> indi Pro be I
SCE-T-313	Chapter 4.12	4.12-7	As detailed in SCE's accompanying letter, the construction activities associated with System Alternative B are estimated to be at least 18 to 36 months just for substation work alone, and this duration does not even account for additional potential work that may be needed outside the substation, such as 66 kV line reconductoring and installation of additional distribution circuits.		System See Ma

CPUC Response				
ent incorporated.				
dates to Alternative Subtransmission Alignment 1 description require changes to this analysis.				
dates to Alternative Subtransmission Alignment 2 description require changes to this analysis.				
inges are necessary pursuant to updates to the Alternative nsmission Alignment 3 description as the existing language is ve of the additional details provided.				
ZIR Page 4.12-6 has been updated as follows: Instruction, operation and maintenance activities associated with ernative Substation B would be the same as under the Proposed ject. Duration of construction is also expected to be similar to Proposed Project.; however, it would require the construction of approximately 16-foot high perimeter wall, which is higher than wall proposed for the Proposed Project. Therefore, total project istruction of Alternative Substation Site B would be expected to proportionately longer than the Proposed Project. However, the litional construction time necessary for Alternative Substation a B would not induce substantial population growth directly or irectly, as it would use the same labor pool as the Proposed ject; therefore, impacts related to population and housing would the same as under the Proposed Project.				
Alternative B was eliminated from analysis in the Final EIR. aster Response 1, <i>Alternatives</i> in Section 3.1.1, for details.				

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-313 (cont.)			The current analysis should be revised to account for the full scope of System Alternative B, especially these components that would occur outside of existing substations.		
SCE-T-314	Chapter 4.13	4.13-4	In Table 4.13-1 , Tutor Time Childcare/Learning Center is listed as 400 feet west of the Proposed Project but actually is located east of the Proposed Project. Additionally, as previously mentioned, please include locational references for measurement as SCE indicated a different distance from the same location in the PEA.	Please revise as follows for Table 4.13-1: "400 feet west <u>east</u> of the Proposed Project."	Comm
SCE-T-315	Chapter 4.13	4.13-4	Under the heading Libraries , the distance of the Ronald Reagan Presidential Library from Alternative Substation Site B is not included.	Please include a distance from Substation Site Alternative B to the Ronald Regan Presidential Library.	Draft The in t nor Alt mil app Ali <u>Alt</u>
SCE-T-316	Chapter 4.13	4.13-6	Under the heading a.i) Fire Protection , it is explained that, "The proposed subtransmission alignment would be constructed in an existing utility corridor," SCE would like to clarify that the proposed subtransmission line would be constructed primarily within existing road ROW where current utility facilities already exist.	Please revise as follows: "the proposed subtransmission alignment would be constructed in an primarily road ROW with current utility facilities existing utility corridor"	Comm
SCE-T-317	Chapter 4.13	4.13-7	Under the heading, a.ii) Police Protection, it is explained that, "the subtransmission line and proposed Presidential Substation would require monitoring in the form of police response to potential trespassing."	Please revise as follows: "the subtransmission line and proposed Presidential Substation would could require monitoring in the form of police response to potential trespassing."	Comm
SCE-T-318	Chapter 4.13	4.13-7	Under the heading, a.ii) Police Protection , the last paragraph needs to include a conclusion statement that no impact would occur.	Please insert the following language after the last sentence of the last paragraph: " <u>Accordingly, no impact would occur.</u> "	Comm
SCE-T-319	Chapter 4.13	4.13-9	As provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis.		The ch to the i
			The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		
SCE-T-320	Chapter 4.13	4.13-9	As provided in the comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 2 contains additional project scope not considered in this analysis.		The ch to the i
			The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		
SCE-T-321	Chapter 4.13	4.13-9	As detailed SCE's accompanying cover letter, Alternative Subtransmission Alignment 3 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		The im has bee Du Sul ins <u>this</u> add

CPUC Response
ent incorporated.
EIR Page 4.13-4 has been updated as follows:
e Ronald Reagan Presidential Library, at 40 Presidential Drive he City of Simi Valley, is located approximately 0.7 mile theast of the Proposed Project, approximately 0.2 mile east of ernative Subtransmission Alignment 1, approximately 0.4 e north of Alternative Subtransmission Alignment 2, roximately 0.4 mile northeast of Alternative Subtransmission gnment 3, and approximately 0.4 mile northeast of ernative Substation Site B (RRPFL, 2009).
ent incorporated.
ent incorporated.
ent incorporated.
anges to this alternative's description do not require changes mpact analysis.
anges to this alternative's description do not require changes mpact analysis.
pact analysis for Alternative Subtransmission Alignment 3 n updated as follows (Draft EIR page 4.13-9):
ing construction, additional portions of Alternative stransmission Alignment 3 subtransmission alignment would be alled underground compared to the Proposed Project. <u>To do</u> , the road shoulder would need to be widened and some itional retaining walls may be required.
· · · ·

3. Comments and Responses

3.4 Southern California Edison Responses

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-322	Chapter 4.13	4.13-10	As detailed SCE's accompanying cover letter, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		The im updated Pro Val asso as <u>c</u> diff <u>unc</u> rem woo
SCE-T-323	Chapter 4.13	4.13-10	As detailed in SCE's accompanying letter, "no new facilities" as mentioned under System Alternative B is an incorrect assumption. In contrast, a development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. For example, this alternative would require reconductoring of the Moorpark- Royal No 2 66 kV line, installation of a new capacitor bank at Malibu Substation, and new distribution circuitry. The current analysis should be revised to account for the full scope of System Alternative B, especially these components that would occur outside of avieting substations.		See Re SCE ar Alterna Master
SCE-T-324	Chapter 4.15	4.15-1	Under the heading, 4.15.1 Setting , the first sentence does not clearly represent the location of the Proposed Project.	Please revise as follows: "The Proposed Project is located northeast of the City of Thousand Oaks-in southern southeastern Ventura County."	Comm
SCE-T-325	Chapter 4.15	4.15-4	Under the heading Traffic Volumes and Levels of Service , the paragraph appears to mix average daily traffic (ADT) volumes with peak hour Level of Service (LOS). If trying to convey ADT then the ADT LOS should be provided. Alternatively, peak hour traffic volumes should be provided if the purpose is to convey peak hour LOS. Please revise the paragraph to provide the ADT LOS or the peak hour volumes for these roadways. In addition, please provide a table with the roadway capacities for Hwy 23, Tierra Rejada, Madera Road, and Moorpark Road. This table would assist the reader to understand how close the roadways are to capacity.		Text ha hour Lu Roa Tra Vol Howev comme did not Project intende current daily tr average make in engine
SCE-T-326	Chapter 4.15	4.15-6	Under the heading, Local , describe the applicability of local land use regulations to the project.	Please insert the following under the Local heading: " <u>CPUC</u> <u>General Order 131-D explains that local land use regulations</u> <u>would not apply to the Proposed Project, Accordingly, the</u> <u>following discussion of local land use regulations is provided for</u> <u>informational purposes only."</u>	No tex
SCE-T-327	Chapter 4.15	4.15-8	Under the heading, Construction Easement Requirements , private roads could be used for access during construction as referenced in section 2.8.2 Access Roads of this DEIR.	Please revise as follows: " <u>Construction vehicles and equipment</u> would use a combination of existing paved and unpaved public and private roads. Existing paved public roads and unpaved access roads would be used to provide necessary construction access."	Comm

CPUC Response

npact analysis for Alternative Substation Site B has been ed as follows (Draft EIR page 4.13-10):

though Alternative Substation Site B would differ from the oposed Project in that it would be located in the City of Simi lley, construction, operation and maintenance activities sociated with Alternative Substation Site B would be the same or similar to under the Proposed Project. <u>Construction would</u> fer in that the substation perimeter wall would be taller than der the Project, and existing structures onsite would need to be noved. However, overall, the duration Duration of construction build also be similar to the Proposed Project.

esponse to SCE-T-124. Pursuant to comments received from nd follow up discussions and data received, System ative B was eliminated from analysis in the Final EIR. See Response 1, *Alternatives* in Section 3.1.1, for details.

ent incorporated.

as been revised to clarify that references to LOS mean peak-LOS as follows:

badway conditions are analyzed based on Average Daily affic (ADT), <u>and Peak Hour</u> Level of Service (LOS), and blume to Capacity (V/C) ratio.

ver, there is no need to revise text in full compliance with enter's request. The analysis of impacts did not include (and t need to include) calculations of LOS under Existing Plus t conditions; the reported existing peak-hour LOS is ed to paint a picture for the reader as to the general level of t congestion on area roadways. The relatively low-level of rip generation for the project allows it to be compared to ge daily traffic (ADT) volumes on area roadways in order to impact determinations based on professional traffic tering judgment.

t change made. See Response SCE-T-6.

ent incorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-328	Chapter 4.15	4.15-8	Under the heading Construction Easement Requirements , the second paragraph does not accurately reflect the access road construction that would occur east of Hwy 23. Please update the paragraph using the language provided.	Please revise as follows: <u>"In addition, construction activities</u> would use paved and unpaved roads east of Hwy 23, north of Olsen Road as depicted on Figure 2-10 . Grubbing and clearing would be required for use of an existing unpaved access road off of Olsen/Madera Road. These unpaved access roads would necessitate rehabilitation and widening to a finished width of 14 feet."	Comme
				An unpaved dirt road provides access to the 16 kV distribution eircuit between Hwy 23 and the proposed Presidential Substation site, and is approximately 0.5 mile long. SCE has an access easement for maintenance of the existing 16 kV distribution eircuit but it is anticipated that approximately 0.3 mile of this access road could require rehabilitation and widening to support proposed subtransmission alignment construction activities. The existing road ranges between eight and ten feet in width, subtransmission construction and maintenance activities would require widening the road to fourteen feet.	
SCE-T-329	Chapter 4.15	4.15-10	Under the heading, Proposed Presidential Substation Construction , the second paragraph explains the 40,000 cubic yards of fill for the substation would require approximately 5,440 truck loads. The average truck load could consist of 10 cubic yards, therefore the total number of truck trips would be approximately 4,000. There would be approximately 45 fill deliveries per day or 90 one-way truck trips.	Please revise as follows: "The Proposed Project would require approximately 40,000 cubic yards of fill, which would generate approximately $5,440 4,000$ truck loads to bring the fill to the proposed Presidential Substation site from offsite locations. Grading is expected to take 90 work days and assuming that the truck trips are divided evenly over the 90 days, there would be approximately 60.45 fill deliveries per day or 120.90 one-way truck trips. The impacts from the additional 120.90 truck trips would include short-term intermittent lessening of roadway capacities due to slower movements and larger turning radii of trucks compared to passenger vehicles."	Comm The yard truc Sub <u>cap</u> take eve: deli fror and mov
SCE-T-330	Chapter 4.15	4.15-10	Under the heading, Proposed Presidential Substation Construction , the fourth paragraph explains the bike lane would be closed for approximately eight months; however, for clarification, closures would occur intermittently for portions of the bike lane.	Please revise as follows: "It is estimated that trenching would take 104 work days, the vault delivery, cable pulling, switch installation and cable splicing would take 59 work days, and paving would take seven work days, thus, <u>portions of</u> the bike lane would be closed <u>intermittently</u> for approximately eight months."	Comme
SCE-T-331	Chapter 4.15	4.15-10	Under the heading, Proposed Subtransmission Alignment Construction , please clarify that existing ROW refers to "primarily within existing road ROW."	Please revise as follows: "with approximately 66 steel poles with polymer insulators <u>primarily</u> within the existing <u>road</u> ROW."	Comme
SCE-T-332	Chapter 4.15	4.15-11	Under the heading, Proposed Subtransmission Alignment Construction , for clarification, SCE assumes the first paragraph is referring to work along Read Road rather than across Read Road.	Please revise as follows: "The placement of the proposed subtransmission alignment on poles across along Read Road would temporarily disrupt existing transportation and traffic patterns in the vicinity of the crossing."	Comme
SCE-T-333	Chapter 4.15	4.15-11	Under the heading, Proposed Subtransmission Alignment Construction , for clarification, SCE will coordinate construction activities along Read Road with emergency service providers. In addition, a nearby roadway in the area may provide an additional emergency access route to residences along Read Road.	Please revise as follows: "Access on Read Road for emergency vehicles would be maintained at all times. No- <u>An</u> alternative access (detour) for emergency vehicles is may be available via a roadway leading from Olsen Road. As discussed in Section 4.8 Hazards and Hazardous Materials (At page 4.8-21), SCE and/or its contractors would coordinate all construction activities with emergency service providers in and along the proposed subtransmission alignment to minimize disruption to emergency vehicle access."	No text The cor provide Read R an adeq Section 4.15-1b of emer remain

ent incorporated.

nent incorporated as follows:

e Proposed Project would require approximately 40,000 cubic ds of fill, which would generate approximately 5,4404,000ck loads to bring the fill to the proposed Presidential ostation site from offsite locations, assuming an average truck oacity of 10 cubic yards (SCE, 2012d). Grading is expected to e 90 work days and assuming that the truck trips are divided enly over the 90 days, there would be approximately $\frac{6045}{6045}$ fill iveries per day, or $\frac{12090}{12090}$ one-way truck trips. The impact m the additional $\frac{12090}{12090}$ truck trips would include short-term l intermittent lessening of roadway capacities due to slower vements and larger turning radii of the trucks compared to ssenger vehicles.

ent incorporated.

ent incorporated.

ent incorporated.

t change made.

mment's reference to "a nearby roadway in the area [that] may e an additional emergency access route to residences along coad" is a gated "Read Road Bypass" that could not function as quate additional emergency access route. Also, the text cited in a 4.8 is that section's cross-reference to Mitigation Measure b, which talks about coordination with and advance notification rgency service providers, but also says that "All roads shall passable to emergency service vehicles at all times".

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-334	Chapter 4.15	4.15-11	Under the heading, Proposed Subtransmission Alignment Construction , regarding the fourth paragraph, SCE does not anticipate blocking access to Underwood Family Farms. Any closures required along Sunset Valley Road would not completely block access to Underwood Family Farms because another access to the farm would remain available via Tierra Rejada Road or Read Road.	Please revise as follows: "The temporary closure of a lane or of an entire roadway segment would be required on Sunset Valley Road to ensure public safety during construction. <u>However, access to the Underwood Family Farms would still be available either from the north or south on Sunset Valley Road during construction.</u> Temporary closure or partial closure of Sunset Valley Road would have the potential to block access to the Underwood Family Farms, ereating traffic congestion and confusion for patrons of the Farms."	No text The CF from T
SCE-T-335	Chapter 4.15	4.15-12	Under the heading, Operations, please clarify that maintenance activities on the existing subtransmission line ROW actually refers to the existing facilities located on the Proposed Project subtransmission alignment.	Please revise as follows: "Maintenance activities would not increase above existing levels that are employed to maintain the existing <u>utility facilities</u> subtransmission line ROWs and therefore, would not result in an increase in traffic in the study area."	Comme
SCE-T-336	Chapter 4.15	4.15-12 - 4.15-13	With regard to the Proposed Mitigation Measures on pages 4.15-12 through 4.15-13, in the context of Impact 4.15-1 , as previously mentioned in multiple resource sections of the DEIR, CPUC GO 131-D explains that local land use regulations would not apply to the Proposed Project. Therefore policies in the City of Thousand Oaks general plan and potential conflicts would not be relevant for purposes of the analysis, and references to such policies should be included for informational purposes only. Because local land use regulations do not apply to the proposed project, there are no impacts that require mitigation. Therefore, Mitigation Measures 4.15-1a through 4.15-1d are not required.	Please remove Mitigation Measures 4.15-1a through 4.15-1d should be removed.	No text Encroa use reg stipulat traffic i
SCE-T-337	Chapter 4.15	4.15-15	Mitigation Measure 4.15-3a refers to implementation of Mitigation Measure 4.15-1a, Mitigation Measure 4.15-1b, and Mitigation Measure 4.15-2c. It is redundant and unnecessary to create a new mitigation measure that refers to implementation of other mitigation measures.	Please remove Mitigation Measure 4.15-3a.	No text It is sta mitigat
SCE-T-338	Chapter 4.15	4.15-15	Mitigation Measure 4.15-1a should be revised to provide that notification and encroachment permits need only be provided for the public and private road crossings implicated in specific construction activities.	Please revise as follows: "Mitigation Measure 4.15-1a: SCE shall obtain and comply with local road encroachment permits for public roads that are crossed by the proposed subtransmission alignment. SCE shall also <u>notify the owner of any private road</u> <u>east of HWY 23 that will be crossed by the proposed</u> <u>subtransmission alignment regarding coordinate</u> short-term construction activities at the private road crossing. applicable <u>private property owners</u> . Copies of all encroachment permits <u>for</u> <u>those specific</u> construction activities <u>that will involve the crossing</u> <u>of a public road</u> , and evidence of private property <u>owner</u> <u>notification for those construction activities that will involve the</u> <u>crossing of a private road east of HWY 23, coordination</u> shall be provided to the CPUC prior to the commencement of <u>those</u> <u>specific</u> construction activities."	Comme
SCE-T-339	Chapter 4.15	4.15-15	Mitigation Measure 4.15-3b is unclear with respect to who "Project Partners" are. This is not a defined term in SCE's PEA; nor is it a defined term in this DEIR. In addition, the measure itself is not needed and should be deleted. SCE already makes such repairs pursuant its franchise agreements with local jurisdictions and/or applicable local jurisdiction encroachment permits. Generally, encroachment agreements typically require a pre-construction meeting be held with city/county staff (typically the City/County Inspector and/or other Public Works/ Engineering department representatives) prior to construction starting.	Please remove Mitigation Measure 4.15-3b	Comme

CPUC Response
t change made.
PUC knows of no access to the Underwood Family Farms ierra Rejada Road or Read Road.
ant in componented
ent incorporated.
t change made.
chment permits and Traffic Management Plans are not "land ulations". They are means to manage traffic impacts by ing measures to control when, where, and how construction is to occur.
t change made.
ndard practice to cross-reference a previously-described ion measure that applies to another impact.
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in meorporated.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-340	Chapter 4.15	4.15-16	Mitigation Measure 4.15-4 and 4.15-5 refer to implementation of mitigation measures already proposed in the Transportation and Traffic section for this DEIR. It is redundant and unnecessary to create a new mitigation measure that refers to implementation of other mitigation measures.	Please remove Mitigation Measures 4.15-4 and 4.15-5.	No tex It is st mitiga
SCE-T-341	Chapter 4.15	4.15-16	Under the heading Impact 4.15-5 , as explained in multiple resource sections of the DEIR, CPUC GO 131-D explains that local land use regulations would not apply to the Proposed Project because local land use regulations do not apply to the proposed project, there are no impacts that require mitigation. Furthermore, Mitigation Measures 4.15-5 would not be warranted to reduce	Please remove Mitigation Measure 4.15-5	No tex The m to miti
SCE-T-342	Chapter 4.15	4.15-17	 the impact to less than significant. The scope described for Alternative Subtransmission Alignment 1 is incomplete. For example, the second source line would require a new access road. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1. Prior comments regarding mitigation measures and significance conclusions for the transportation and traffic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 1. 		Revise Th be <u>Al</u> alc pla the 10 bri
SCE-T-343	Chapter 4.15	4.15-17	The scope described for Alternative Subtransmission Alignment 2 is incomplete. Modification of access road east of HWY 23, as well as the pole replacement for the telecommunication component would be required for this alternative. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2. Prior comments regarding mitigation measures and significance conclusions for the transportation and traffic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 2.		Text ru Th Al' the tru tel <u>tra</u> anu 23 anu Al the
SCE-T-344	Chapter 4.15	4.15-18	 The scope described for Alternative Subtransmission Alignment 3 is incomplete. For example, the telecommunication line east and west of HWY 23 may necessitate the replacement of existing poles, construction of a Hilfiker wall, and widening of access roads east of HWY 23. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3. Prior comments regarding mitigation measures and significance conclusions for the transportation and traffic impacts analysis would be equally applicable to Alternative Subtransmission Alignment 3. 		Text r Al add sul ali lar <u>are</u> for clc
SCE-T-345	Chapter 4.15	4.15-19	 The scope described for Alternative Substation Site B is incomplete. For example, in order to accommodate the substation footprint, an approximately 16 foot high retaining wall would need to be constructed at the top of the existing slope (generally in the area currently used for overflow parking). Such work has the potential to generate additional truck trips. The current analysis should be revised to account for the full scope of Alternative Substation Site B. Prior comments regarding mitigation measures and significance conclusions for the transportation and traffic impacts analysis would be equally applicable to Alternative Substation Site B. 		Text r Th the <u>on</u> da Su roa an 1d les

kt change made.

andard practice to cross-reference a previously-described tion measure that applies to another impact.

kt change made.

itigation measure is not a "land use regulation." It is a means igate traffic impacts.

ed text on page 4.15-17:

ternative Subtransmission Alignment 1 would the same as the Proposed Project <u>along Read Road.</u> <u>ternative Subtransmission Alignment 1 would not be placed</u> ong Sunset Valley Road, but a second source line would be aced along Esperance Road (an unpaved, local roadway), and <u>thus, a total number of daily truck trips of approximately</u> ,880 one way truck trips (120 per day) would be required to ang fill to the <u>work</u> site<u>s would be similar to the project</u>.

evised on page 4.15-18:

te location for the proposed Presidential Substation for ternative Subtransmission Alignment 2 would be the same as e Proposed Project, thus, approximately 6045 daily round-trip tek trips would be required to bring fill to the site. <u>A</u> <u>ecommunication line would be required for this alternative,</u> <u>veling west from the proposed substation site under Hwy 23</u> <u>d along Read Road. Modification of access roads east of Hwy</u> <u>could also be necessary as would some potential tree removal</u> <u>d/or tree trimming.</u> Impacts from increased truck traffic for ternative Subtransmission Alignment 2 would be greater than <u>be same as-the Proposed Project.</u>

evised on page 4.15-18:

ternative Subtransmission Alignment 3 would require ditional road closures for the purpose of undergrounding btransmission lines. <u>Additionally, for the portion of the</u> <u>gnment that would be undergrounded, SCE would construct a</u> <u>ge flat pad to accommodate construction vehicles, turnaround</u> <u>eas, crane pad areas for installing the vault, and access roads</u> <u>c construction and maintenance, which may also require road</u> <u>osures.</u>

evised on page 4.15-19:

e demolition and hauling would create truck trips to and from e site, <u>as would the construction of the retaining wall required</u> <u>the south side of the parcel</u>, but likely fewer than the 6045 ily round trips needed to haul fill to the proposed Presidential bstation site. As with the Proposed Project, all impacts to area adways from construction would be <u>short-term and</u> temporary, d implementation of Mitigation Measures 4.15-1a through 4.15-, and Mitigation Measure 4.15-3b, would reduce impacts to a st than significant level.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-346	Chapter 4.15	4.15-19	As described in SCE's accompanying cover letter, the scope described for System Alternative B is incomplete. For example, development of System Alternative B would require the construction of new facilities, many of which would be outside existing facility footprints. Additionally, grading and paving activities would be required for, among other things, foundation work and expansion of the substation footprints. Such work has the potential to generate additional truck trips. Therefore, the following statements are unsubstantiated, "therefore, the number of construction trips needed for delivery of equipment and the circulation of construction trips needed for delivery of equipment and the circulation of construction trips needed for delivery of equipment and the circulation of construction trips needed for delivery of equipment and the circulation of construction trips needed for delivery of equipment and the circulation of construction employee vehicles would be minimal."		The fu Altern was fa System EIR. S additio
			The current analysis should be revised to account for the full scope of System Alternative B.		
SCE-T-347	Chapter 4.16	4.16-6 – 4.16-7	Under the heading Local , various policies from the General Plans include information not relevant to evaluating potential impacts associated with the CEQA significance criteria for Utilities and Service Systems, therefore, they should be removed from the regulatory context.	Please remove Ventura County Goal 4.5.11, Policy 4.5.2.2, Policy 4.5.2.3; and City of Thousand Oaks Policy 9.	No cha
SCE-T-348	Chapter 4.16	4.16-6	Under the heading, Ventura County Construction and Demolition Debris Ordinance, in the first sentence, replace the reference to "Tulare County" with Ventura County.	Please revise as follow: "The Tulare-<u>Ventura</u> County Recycling"	Comm
SCE-T-349	Chapter 4.16	4.16-8	Under the heading, Impact 4.16-1 , the second sentence is incomplete.	Please revise as follows: "The only wastewater generated during construction would be from the use of portable <u>sanitation</u> <u>facilities, a one time limited time frame</u> ."	Comm
SCE-T-350	Chapter 4.16	4.16-8	Under the heading, Impact 4.16-1 , the Presidential Substation would have a portable sanitation facility during operation for those accessing the site for routine maintenance and inspections. The portable sanitation facility during operation would not change the impact conclusion for Impact 4.16-1.	Please revise as follows: "No additional wastewater would be <u>The</u> <u>only wastewater</u> generated during operation or maintenance of the Proposed Project, as the Proposed Presidential Substation would not have bathroom facilities would be from the use of portable sanitation facilities at the Proposed Presidential Substation."	Comm
SCE-T-351	Chapter 4.16	4.16-9	Regarding Table 4.16-3 , the approximate surface area (ft ²) for the element "Perimeter Wall Foundation" is incorrect and should be revised. Since the foundations are impervious and are below the surface for approximately 24 inches, the footing area should not be accounted for in the surface area calculation.	Please revise the table to reflect an approximate surface area of 650 ft^2 for the element "Perimeter Wall Foundation."	The nu EIR C a simil corresp Section been n
SCE-T-352	Chapter 4.16	4.16-10	Under the heading, 4.16.4 Impacts and Mitigation Measures c), the total approximate impervious area will exceed the 5 percent EIA of the project area. However, additional water quality BMPs may be implemented to reduce the cumulative storm water run-off from leaving the site. Specific water quality BMPs will be determined during final engineering.		Draft I Mi con to s red Sul
SCE-T-353	Chapter 4.16	4.16-10	Under the heading, Impact 4.16-2 , insert the word Project in the last sentence.	Please revise as follows: "Construction, operation and maintenance of the Proposed <u>Project</u> would therefore not require new or expanded waster supply resources or entitlements."	Comm
SCE-T-354	Chapter 4.16	4.16-11	Under the heading, Impact 4.16-3 , please update the analysis to include the portable sanitation facility during operation. The portable sanitation facility during operation would not change the impact conclusion for Impact 4.16-3.		The arrevised In factor

CPUC I	Response
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all range of project components associated with System hative B, including the technical aspects listed in this comment, actored into further consideration of this alternative. However, in Alternative B has been removed from the analysis in the See Master Response 1, *Alternatives* in Section 3.1.1 for bonal information.

ange made. This text provides important regulatory context.

nent incorporated.

nent incorporated.

nent incorporated.

umbers in Draft EIR Table 4.16-3 are consistent with Draft hapter 2, *Project Description*, Table 2-5. SCE did not request lar change for Table 2-5, nor did SCE comment on the ponding impervious surface numbers for Draft EIR n 4.9, *Hydrology and Water Quality*. As such, no change has nade to Table 4.16-3.

EIR page 4.16-9 has been updated as follows:

itigation Measure 4.9-3 would implement storm water quality ntrol measures and BMPs to reduce potential impacts related stormwater runoff and erosion. The Proposed Project would luce the EIA at the Substation to less than 5 percent of the bstation project area, and runoff from impervious areas in cess of the 5 percent allowance would be retained on site.

nent incorporated.

halysis for Impact 4.16-3 on Draft EIR page 4.16-11 has been d as follows:

addition, construction crews would use portable sanitation silities (portable toilets), generating relatively small volumes wastewater for a limited time during the construction phase. d the proposed Presidential Substation would have a portable

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-354 (cont.)					sa ro an op di di No Pr WH Pr WH
SCE-T-355	Chapter 4.16	4.16-15	Under the heading, Alternative Substation Site B , please refer to SCE's response to CPUC Data Request Set 3, Question 45, which included a copy of a July 8, 1998, letter from the County of Ventura Resource Management Agency (Environmental Health Division), entitled "Underground Tank Release at Former East Ventura County Sheriff Substation, 2201 East Olsen Road, Thousand Oaks, California." According to the letter, the underground fuel storage tanks were previously removed.	Please revise as follows: "However, construction of Alternative Substation B would involve greater impacts than those described for the proposed Presidential Substation, as construction would require the removal of existing structures on the site, including several abandoned concrete block buildings and structures, a garage, former underground fuel storage tanks, and parking areas."	Com
SCE-T-356	Chapter 4.16	4.16-13	As provided in comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 1 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 1.		Chang its im
SCE-T-357	Chapter 4.16	4.16-14	As provided in the comments for Chapter 3 of this DEIR, Alternative Subtransmission Alignment 2 contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 2.		Chang its im
SCE-T-358	Chapter 4.16	4.16-14	As detailed SCE's accompanying cover letter, Alternative Subtransmission Alignment 3 contains additional project scope not considered in this analysis. For example, the telecommunication line east and west of HWY 23 may necessitate the replacement of existing poles, construction of a Hilfiker wall, and widening of access roads east of HWY 23. Therefore, the following statement is inaccurate, "Alternative 3 would not require the construction of additional access roads east of Hwy 23, or the replacement of the existing wood poles from the intersection of Sunset Valley and Read Road." The current analysis should be revised to account for the full scope of Alternative Subtransmission Alignment 3.		The in has be Th be Pr ad ex Ro So <u>So</u> th en sta
SCE-T-359	Chapter 4.16	4.16-15	As detailed SCE's accompanying cover letter, Alternative Substation Site B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of Alternative Substation Site B.		Chang its im
SCE-T-360	Chapter 4.16	4.16-15	As detailed SCE's accompanying cover letter, System Alternative B contains additional project scope not considered in this analysis. The current analysis should be revised to account for the full scope of System Alternative B.		The fu Altern altern the an Section
SCE-T-361	Chapter 5		All of the SCE's aforementioned comments apply equally to the content contained in Chapter 5. In addition, please refer to SCE's accompanying cover letter for additional arguments.		Chang inform Section

nitation facility during operation for those accessing the site for utine maintenance and inspections. These toilets would generate elatively small volume of wastewater during the construction, erations and maintenance phases. Sanitation waste would be sposed of according to sanitation waste management practices. to other sources of wastewater are anticipated during the oposed Project construction activities. No additional wastewater would be generated, or during operation or maintenance of the oposed Project, as the proposed Presidential Substation would t have bathroom facilities.

nent incorporated.

ges to the description of alternative do not require revisions to pact analysis.

ges to the description of alternative do not require revisions to pact analysis.

npact analysis for Alternative Subtransmission Alignment 3 een revised as follows (Draft EIR page 4.16-14):

the trenching required for undergrounding the 66kV line would 20 inches deeper than the trench required for the Proposed oject. Alternative 3 would not require the construction of ditional access roads east of Hwy 23, or the replacement of the isting wood poles from the intersection of Sunset Valley and ead Road east to the proposed Presidential Substation site. ome additional widening and grading of the access road along e 66 kV underground alignment may be necessary if gineering determines existing access roads do not meet andards required for construction equipment.

ges to the description of alternative do not require revisions to pact analysis.

all range of project components associated with System native B was factored into further consideration of this ative. However, System Alternative B has been removed from alysis in the EIR. See Master Response 1, *Alternatives* in on 3.1.1 for additional information.

ges have been made to Chapter 5 as appropriate based on new nation from SCE. Also see Master Response 1, *Alternatives* in on 3.1.1 for additional information.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-362	Chapter 6	6-2	Under the heading 6.2 Significant Environmental Effects that Cannot be Avoided , it notes that the Proposed Project would result in impacts to noise and that, even with implementation of mitigation measures, those impacts would remain significant and unavoidable. As previously mentioned in comments related to the noise analysis of this DEIR, the significant unavoidable impact conclusion incorrectly compares the Proposed Project construction noise to a general plan policy. As explained in the regulatory context of the noise section, the general plan policy is not applicable based on GO131-D, therefore the significant unavoidable impact would not exist.		Revisio T-285,
SCE-T-363	Chapter 6	6-2	Under the heading 6.2 Significant Environmental Effects that Cannot be Avoided , it states, "The proposed Presidential Substation and proposed substation alignments would be against natural landscapes and the Proposed Project, significant impacts would be unavoidable." As previously mentioned in comments related to the Aesthetics analysis of this DEIR, the visual characterizations made in Table 4.1-2, are not supported based on the existing features within the environmental setting, and thus such significant unavoidable impacts would not exist.		As desc charact on the has bee Aesther Signific
SCE-T-364	Chapter 6	6-5	Under the heading 6.4.2 Agricultural Resources , the following statement is incorrect and needs revised, as it references the wrong table number: "As shown in Table 3-12 in Section 3.6, Cumulative Impacts, …"	Please revise as follows: "As shown in Table 3-12 3-3 in Section 3.6, Cumulative Impacts"	Comma As an a imp Tat env that
SCE-T-365	Chapter 6	6-5	 Under the heading 6.4.2 Agricultural Resources, the DEIR states; "Table 3-12 also shows a number of projects not yet in the environmental planning stage, where the acreage of Farmland that could be converted by these projects is unknown." The CEQA guidelines (section 15355 (b)) require that the "change" be evaluated and if such a change is unknown, as mentioned in the statement above, it is unclear what the DEIR analysis is evaluating for making a determination that there is a cumulatively significant impact. Furthermore, the analysis in this section goes on to explain that between 2006 and 2008 Ventura County saw a reduction in agricultural land and such data for purposes of this analysis is considered evidence of an existing significant cumulative impact. However as explained in the CEQA guidelines, the cumulative impact from several projects is the change in the environment from other "closely related" projects. Comparing this project to the County's reduction of agricultural land as a whole, and particularly projects in the County that were completed well before the Notice of Preparation was issued for this DEIR, is not in the spirit of Section 15355(b) of the CEQA guidelines. Table 3-12 was prepared to identify projects thought to be "closely related" to the Proposed Project, but for this potential impact the Proposed Project is being evaluated against a much larger potential project area. By inappropriately comparing the Proposed Project to this much larger potential project area, the DEIR incorrectly concludes a cumulatively significant impact would occur and proposes Mitigation Measure 4.2-1. For the reasons mentioned above, the cumulatively significant impact conclusion is not supported by the information provided in this section of the DEIR and therefore the conclusion should be revised and Mitigation 	Please revise the analysis in section 6.4.2 Agricultural Resources and remove Mitigation Measure 4.2-1.	As dese the acre project yet in t cumula evaluat closely future p as the g convers Mappin "Land Califor withou historic signific Becaus existing reduce

CPUC Response

ons to Section 6.2 are not warranted. Refer to Responses SCEand SCE-T-289 through SCE-T-294 above.

scribed in Responses SCE-T-101 and SCE-T-102, the visual sterizations made in Draft EIR Table 4.1-2 are supported based existing features within the environmental setting. No change en made to the impact conclusions in Draft EIR Section 4.1, *etics*, and no change is required in Draft EIR Section 6.2, *icant Environmental Effects that Cannot be Mitigated*.

ent incorporated as follows:

shown in Table $\frac{3}{123-3}$ in Section 3.6, Cumulative Impacts, approved residential project at 4920 Read Road could cause bacts to Farmland adjacent to those of the Proposed Project. ble $\frac{3}{123-3}$ also shows a number of projects not yet in the vironmental planning stage, where the acreage of Farmland t could be converted by these projects is unknown.

cribed on Draft EIR page 6-5, it is not possible to determine eage of Farmland that would be converted by the cumulative ts listed in Table 3-12, because a number of projects are not he environmental planning stage. Therefore, to ensure that the ative analysis of impacts to agriculture and forestry resources tes "the incremental impact of the project when added to other related past, present, and reasonably foreseeable probably projects" (CEQA Section 15355(b)), Ventura County is used geographic scope of cumulative impacts. Data on Farmland sion in Ventura County is available from the Farmland ng and Monitoring Program (FMMP), which showed that use conversion trends indicate that the acreage of Farmland in nia and Ventura County is expected to decline with or t the Proposed Project. For purposes of this analysis, the e decline and trend is considered evidence of an existing cant cumulative impact" (Draft EIR page 6-5).

se the Proposed Project would contribute incrementally to an g cumulative impact, Mitigation Measure 4.2-1 is required to cumulative impacts from the Propose Project to less than cant. No change has been made to Draft EIR Section 6.4.2.

Comment	Section	Page	Comment	Suggested Revision	
SCE-T-366	Chapter 6	6-6	Under the heading 6.4.3 Air Quality , SCE's prior comments made to Chapter 4.3 Air Quality, regarding impact conclusions and mitigation measures would be equally applicable to this section.		Revision SCE-T
SCE-T-367	Chapter 6	6-7	Under the heading 6.4.4 Biological Resources , SCE's prior comments made to Chapter 4.4 Biological Resources, regarding impact conclusions and mitigation measures would be equally applicable to this section.		Comm compa text wa Pro and site Ca Pro coa pro det US gna the Th imp Th hat tha tha tha tha wa sub app Va Ro jur Va
SCE-T-368	Chapter 6	6-12	Under the heading 6.4.11 Noise , SCE's prior comments made to Chapter 4.11 Noise, regarding impact conclusions and mitigation measures would be equally applicable to this section.		Revisi SCE-T
SCE-T-369	Chapter 6	6-14	Under the heading 6.4.15 Transportation and Traffic , SCE's prior comments made Chapter 4.15 Transportation and Traffic, regarding impact conclusions and mitigation measures would be equally applicable to this section.		Comm compa change
SCE-T-370	Chapter 8		All of the SCE's aforementioned comments apply equally to the content contained in Chapter 8. In addition, please refer to SCE's accompanying cover letter for additional arguments.		Section
SCE-T-371	Appendix C	Table 25	As mentioned in comments for Chapter 4.3, air quality emissions were updated and are attached. SCE updated the air quality calculations to include 2012 emission factors as opposed to the diesel off-road emission factors for the year 2009 that were utilized for the analysis.		See Re

ions to Section 6.4.3 are not warranted. Refer to Responses Γ-150 through SCE-T-152 above.

nents SCE-T-166 through 184 have been reviewed in arison to Section 6.4.4 Biological Resources. The following as added:

otocol-level surveys were performed in this area in 2008, 2010 d 2012, and gnatcatchers were observed on and adjacent to the e. Based on these findings, it was determined that coastal lifornia gnatcatchers could breed on or adjacent to the oposed Presidential Substation. Protocol-level surveys for astal California gnatcatcher surveys also considered the oposed subtransmission alignment and a gnatcatcher pair was tected on this alignment as well. Based on these findings, the SFWS may require formal consultation for coastal California atcatcher impacts and coastal sage scrub habitat losses under e FESA.

e implementation of Mitigation Measure 4.4.-2b would reduce pacts to Coastal California gnatcatcher to less than significant. erefore, the Proposed Project impact to coastal sage scrub bitat and the coastal California gnatcatcher is considered less an cumulatively considerable.

the Proposed <u>Presidential Substation</u>Project would impact proximately 0.05 acre of seasonal wetlands and associated bitat under the jurisdiction of CDFG and 0.04 acre of isolated atters under the jurisdiction of the RWQCB and Corps. <u>The</u> <u>btransmission line for the Proposed Project would impact</u> <u>proximately 0.032 acre of "Waters of the U.S" along Sunset</u> <u>alley Road and approximately 0.004 acre along Tierra Rejada</u> <u>ad. In addition, approximately 0.03 acre of waters under the</u> <u>isdiction of the CDFG would be impacted along Sunset</u> <u>alley Road.</u>

ions to Section 6.4.11 are not warranted. Refer to Responses Γ-285, and SCE-T-289 through SCE-T-294 above.

nents SCE-T-324 through 346 have been reviewed in arison to Section 6.4.15 Transportation and Traffic. No es are necessary.

n 8 has been updated pursuant to changes above.

esponse SCE-31 in Section 3.4.2.

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3.5 Public Hearing Transcripts

This section includes the transcripts from the public meetings with individual comments delineated as indicated above, followed by responses to each comment.

Comment	Letter	PΗ
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1	THURSDAY, OCTOBER 13, 2011; NEWBURY PARK, CALIFORNIA	
2	00000	
3		
4	PRESIDENTIAL SUBSTATION PROJECT	
5	CALIFORNIA PUBLIC UTILITIES COMMISSION	
6	PUBLIC COMMENT MEETING ON THE	
7	DRAFT ENVIRONMENTAL IMPACT REPORT	
8		
9	MIKE MANKA: Mary Benton. And then following	
10	Mary will be Mr. Cronin.	5445 97 - T
11	MARY BENTON: Good evening. My name is Mary	
12	Benton and I am from Thousand Oaks. Every day people are	
13	losing homes, vehicles, and even their lives due to power	
14	line problems. Take a look at the past several weeks.	
15	September 29th: "Sparks from electric power	
16	lines likely started the blaze that became the most	
17	destructive wildfire in Texas history," fire officials	
18	said.	PH-1
19	September 29th, Washington State: Two	
20	electrocutions in two weeks are a reminder of hazards	
21	posed by power lines.	
22	September 29th; Elko, Nevada headlines: "Power	
23	line fires. About 4500 customers without power." The	
24	article mentions the power outage was caused by a crow	
25	contacting the power lines, which also started two	
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Notes tata un essense secondente della

Comment Letter PH

1	A mildland finan English that work DCE and an the start A	
. <u> </u>	Wildland fires. Earlier that week, PGE are on the scene	
2	of downed electrical lines that caught fire.	
3	October 4th: A downed power line in Huntington	
4	Beach sparked a small fire, shut down busy McFadden, and	
5	cut electricity to more than 200 customers.	
6	October 4th; Jacksonville, Texas: Two small	
7	grass fires were caused by downed power lines.	
8	October 5th: Worker killed when his mower hit	
9	the power line.	
10	October 6th: Houston Fire Department officials	
11	believe a power line may be responsible for starting a	
12	grass fire.	PH-1
13	October 6th: Firefighters say power lines got	
14	knocked down on top of a car and eventually sparked a fire	
15	that destroyed it.	
16	October 7th: Last Saturday's fire in Orofino	
17	Gulch was started when the wind blew a dead tree into a	
18	power line.	
19	October 11th: A downed tree that toppled power	
20	lines caused a fire at a home in Washington.	
21	In July, a team of cause-and-origin fire	
22	investigators determined that a power line caused the Las	
23	Conchas fire. The fire has become the largest fire in New	
24	Mexico history.	
25	In the small town of Philo in June, a broken \checkmark	
	2	

Comment Letter PH

1	electrical line led to a fire in their downtown.	
2	In May, high winds swept across Ventura County	
3	causing a power line fire in Ventura. When firefighters	
4	arrived, they found high-power lines arcing on poles for	
5	about a quarter of a mile with several poles on fire.	
6	Do you remember the three family members in San	
7	Bernardino killed in their own backyard due to a downed	
8	power line as strong winds were sweeping through Southern	
9	California? A family member of the victims said it was	
10	the second time power lines had fallen and set fires at	
11	the house.	
12	In March a palm frawn fell onto an electrical	PH-1
13	line in Ventura, inconveniencing 550 Southern California	
14	Edison customers for an hour and a half.	
15	A car collision wreaked havoc in Oxnard's busy	
16	Five Points. Power was lost for more than a day due to a	
17	power pole damaged in the collision.	
18	How about when that dump truck accidentally	
19	pulled down a power line on Tierra Rejada road? That	
20	happened at 8:00 in the morning. The crews had to work	
21	through the night to get things going again.	
22	Think back on the Stinson fire. That massive	
23	fire was sparked when heavy winds downed an electrical	
24	distribution line causing sparking onto the dry brush.	
25	The Moorpark plant, the MGR Design International	
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Comment Letter PH

.1	that burned and sent flammable material into the air was \wedge	
2	started by a downed Southern California Edison power line.	
3	A neighborhood in Auburn, a place that seems the	
4	most unlikely of places for a devastating fire, a suburban	
5	setting boarded by a busy highway, a shopping center	
6	anchored by a Target and a strip of local businesses lost	
7	50 homes. Residents did not even have time to put on	
8	their shoes. A spokesperson for Pacific Gas & Electric	
9	said he understood that downed power lines were part of	
10	the fire investigation and they would have to replace 18	
11	poles.	
12	Did you know that out of the 20 largest	
13	California wildfires by acreage historically until 2009,	
14	20 percent were caused by power lines?	
15	David Hillman, California Fire Chief of Law	
16	Enforcement and Fire Protection stated as far back as	
17	2007, "Utility executives have known for decades that	
18	transmission and distribution lines present a serious risk	
19	of fire. The surest solution is to bury lines in areas	
20	likely to burn."	
21	When State Senator Christine Kehoe served on a	
22	commission that studied wildfires, she said, "Power lines	
23	do not have to fall to start a fire. Arcing wires ignite	
24	dry tree limbs. Kites and balloons hit wires and cause	
25	fires. Even birds spark fires by shorting out lines."	
	4	

PH-1

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1	Jenny Ross, a former prosecutor who won a
2	landmark criminal case against Pacific Gas & Electric, was
3	quoted as saying, "As a general matter, the primary focus
4	in corporate decision-making is on the goal of generating
5	profits, not on environment or social responsibility."
6	Every day brings new nightmares from power and
7	distribution lines. Wires need to be buried. Unburied
8	wires are extremely dangerous, unpredictable and
9	fundamentally wrong. The cost to public agencies is
10	staggering. The fines paid by electric companies in the
11	tens of millions is equally staggering.
12	Please keep our families, our homes and
13	surrounding lands safe. Please do what is environmentally
14	and morally correct.
15	Thank you.
16	MIKE MANKA: Just so everyone knows
17	CHARLES CRONIN: I have one minute now?
18	MIKE MANKA: the worst part of my job is to
19	say, "Okay, please wrap it up." I'll do so when you have
20	approximately a minute left if it looks like it might go
21	long.
22	CHARLES CRONIN: Thank you.
23	First of all, my name is Chuck Cronin. I'm with
24	STTOP, sttopsce.org, a cofounder with many of you in the
25	room.

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Comment Letter PH

PH-2

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1	I would like to thank the CPUC I understand
2	they have a tough job and their consultants for their
3	work on the DEIR, the draft EIR, and for making another
4	trip to our lovely community. I also want to thank the
5	many residents that have shown up. I understand it's been
6	very confusing with the multiple meetings, the weird
7	notices, the corrections to meeting notices, and we
8	appreciate that you felt strongly enough about the
9	project.
10	Please understand that the project is far from
11	over. Just because there's a preferred alternative, which
12	is the upgrading of all the the three substations in
13	Thousand Oaks at Portrero Road and in Thousand Oaks at
14	Royal in Simi Valley. We are about 25 percent of the way
15	there with that preferred alternative. The other
16	alternatives are still possible. As they have explained,
17	it can be changed.
18	Relative to the DEIR, it is a draft document.
19	Feel free to make comments to it. My comments are as
20	follows the high-level ones. I'll submit the rest in
21	writing. The no-project alternative was discussed, but
22	not fully explored. The no-project alternative was
23	promised by the previous ALJ to include a review of the
24	demand. That has never been forthcoming. Edison has
25	never been forthcoming with the support of its projections $$

1 for what would be today 458 megavolts, current levels around 300 without a heat storm. So that would require 2 3 that the area of Simi Valley and Thousand Oaks would have to increase their power consumption by about 38 percent. 4 I don't know about you, but I couldn't afford that on my 5 6 electric bill and I doubt that's going to happen.

7 The other item is that the upgrading of the existing substations with standard equipment would also 8 9 give us a substantial boost in capacity, to around 417 10 megavolts. That's still 25 percent higher than the amount of power that was used in 2009 and 2010 for the peak 11 demand, and those are numbers based on those provided by 12 Southern California Edison. 13

Again, who is to expect a 25 percent increase in 14 15 power consumption when the growth is minimal, something less than three percent for the next four years in Simi 16 17 Valley and Thousand Oaks? But my major concern is that 18 the alternatives of demand management, which include things like mandatory replacement of old HVAC units or 19 20 distributed solar, was not fully explored in this draft When you consider that both Simi Valley and Thousand 21 EIR. 22 Oaks were recently written up as being in the top ten 23 cities that have adopted solar by residents and have also led the way with their city efforts like at the Hill 24 Canyon Waste Treatment Plant and the work that's going on 25

PH-3

PH-2

PH-4

7
1	at the Old City Hall.	PH-4
2	Edison has been approved over \$3 billion, which	
3	is in your current rates, to put in rooftop solar. They	
4	have chosen to do it by gerrymandering the requirements	
5	where it is only being done in Riverside and San	
6	Bernardino Counties. Where was that money available to	PH-5
7	look at solar alternatives in our community where we have	
8	many shopping malls, many retail centers, many grocery	
9	stores that have large growths that can support the solar	
10	projects?	
11	And last, the consumers cannot continue to keep	
12	paying for projects that have, at best, a marginal need.	
13	They have used this project the Presidential Substation	
14	Project was used as the basis one of the projects a	
15	small one for their general rate increase for 2009 that	PH-6
16	went into place in 2010. When you look at the general	
17	rate case for 2012, you find the same Presidential	
18	Substation Project. In my business, if you submitted a	
19	budget item twice in the same year after year and you'd	
20	already spent the money, there would be a lot of questions	
21	to ask, but not for Southern California Edison.	
22	Lastly, I would ask the CPUC to consider a	
23	two-week extension on comments to the DEIR to	PH-7
24	November 15th. We request that because of the confusion	
25	in the notices, the overlapping meetings, and it's a \checkmark	
	• {	3

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1	fairly complex topic to educate people on and communicate. \wedge	
2	We appreciate that you have the meeting, but we only have	
3	14 days from this point for people to get their comments	PH-7
4	together in a written form. And I will be submitting	
5	additional statements in writing to the to your	
6	organization.	
7	Thank you very much.	
8	MIKE MANKA: Our next speaker is Mark Towne, and	
9	then following Mark is Beth Kuttler.	
10	MARK TOWNE: Good evening. My name is Mark	
11	Towne. I work at the City of Thousand Oaks and my title	
12	is Deputy Director of Community Development there. Just a	
13	few quick comments.	
14	First of all, I wanted to thank the CPUC and ESA	
15	for preparing this draft environmental impact report. The	
16	city has been involved in this project now three years	
17	plus and this document does contain a lot of useful	
18	information. Clearly the System Alternative B warrants	PH-8
19	additional information and consideration. That will be	
20	part of a comment letter which we will be submitting on	
21	the draft EIR, as well as other comments, but we wanted to	
22	make that sort of overarching point tonight. As the DEIR	
23	says, that alternative meets all legal, regulatory and	
24	technical feasibility criteria.	
25	I should also note that the City is involved \bigvee	PH-9
	9	

Riggs Reporting Services (805) 557-1075

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Comment Letter PH

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1	actively in this parallel ALJ tract which has been	
2	described this evening, so we will be present at the	PH-9
3	hearing next Tuesday morning.	
4	And so with that, again, I would like to thank	
5	you for holding the meeting tonight and for preparing the	
6	document, and we will be submitting further comments in	
7	writing.	
8	Thank you.	
9	MIKE MANKA: Thank you.	
10	Following Beth is Mark Cassar.	a de la constante de
11	BETH KUTTLER: Good evening. My name is Beth	
12	Kuttler and I'm an attorney for Josh Valdez and the Valdez	
13	family, and I'm here on the Valdez family's behalf just to	
14	put on the record that if this project needs to go	
15	forward and we are still not convinced that it does; we	
16	think that needs more exploration my client does	
17	endorse the EIR suggestion of System Alternative B and,	PH-10
18	along with other speakers tonight, we invite further	
19	exploration of that alternative. And ultimately if a	
20	project needs to go forward, we stress that any	
21	alternative should underground all subtransmission lines.	
22	That is what is best for this community, and the human	
23	environment is the most overriding concern in this	
24	project, and that's the environmental impact that needs to	-
25	be addressed. We will be submitting further comments in \bigvee	
	10	

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Comment Letter PH

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	\wedge	
1	writing as well.	PH-10
2	Thank you.	
3	MIKE MANKA: Thank you.	
4	Following Mark will be Kim Halizak.	
5	MARK CASSAR: Good evening, everyone. Thank you	
6	for coming tonight. It's great to see so many people	
7	here. When I look around, I see one person and another	
8	different person, and all of us live in this area.	
9	My family my wife and three children are here	
10	and some other friends we have been in the Tierra	
11	Rejada Valley for 30 years now. When I first moved out	
12	there, there was no lights. There was just a plain old	
13	valley. It's grown over the years, but it's grown really	
14	nicely. Nice houses, nice farms. People ask, "Where do	
15	you live?" and we say, "We live next to the Underwood	
16	Farms." All the people go, "Oh, I go there. I take my	
17	kids there," and everyone knows that the valley and all of	
18	the surrounding area is really such a lovely area.	
19	To add these poles, these huge metal poles to the	
20	area, it's going to make it look like an industrial zone.	
21	The comments that the draft EIR Alternative B makes make a	- Adama
22	lot of sense because you are taking three substations that	PH-11
23	are already there, that have already been there for many	
24	years, and you are upgrading the equipment in them. We	
25	are not changing anything out on the street, you are not $$	
	11	

changing people's home values, and you are not losing the Λ 1 rural feel that we have in the community that Ventura 2 County and the whole City of Thousand Oaks has fought so 3 hard to keep. 4 There's many times we have been on projects on 5 the other side not to build things and sometimes to build 6 7 things, but this one I think is so simple that no one would be here tonight if it was just upgrading these 8 9 substations or the alternative of putting it all 10 underground. I appreciate everybody for coming. It's hard to 11take your time and follow through with these things. But 12 if we don't do this and we don't push to find the right 13 14 alternative, these big poles will be in our beautiful 15 areas every time we drive down the street. When someone asks where I live, I won't be able to say, "Next to 16 Underwood Farms." It will be, "You know where those big 17 poles are down the street? Right there." 18 19 Thank you. MIKE MANKA: The next speaker after Kim 20 Halizak -- I'm not sure if it's Corene Hanson or Connie 21 22 Hanson. 23 KIM HALIZAK: I don't have it memorized. Sorry. My name is Kim Halizak. Actually, I live in 24 Hollywood, and I'm here to speak on behalf of wildlife. 25 12

PH-11

PH-12

1	Key wildlife linkage in the Tierra Rejada Valley $igwedge$	
2	is threatened by the Presidential Substation Project,	
3	which would also hurt critical habitat for three imperiled	PH-12
4	species: The coastal California gnatcatcher, Riverside	
5	fairy shrimp, and the yellow flowering Lyon's pentachaeta.	
6		
7	the most environmentally destructive path for its project	
8	and ignored important opportunities to increase renewable	
9	energy, energy efficiency, implement smart-grid	
10	technology, and avoid destroying wildlife habitats.	
11	Therefore, if this project were to proceed going	
12	forward, I strongly urge the CPUC to make the	
13	environmentally responsible decision to support the	
14	environmentally superior alternative, System Alternative	РП-13
15	B, which eliminates the significant environmental impacts	
16	of the Presidential Substation Project and costs	
17	ratepayers less. The alternative meets the project's	
18	objectives, costs less money and avoids significant impact	
19	to wildlife and local communities.	
20	Electricity data from the past several years	
21	demonstrates that these costly power lines and new	
22	substations are not needed.	
23	Thank you.	
24	MIKE MANKA: The next speaker after is Mercedes	
25	Todesco.	
	13	

1	CORENE HANSEN: Good evening. I grew up in	
2	Mexico City. I've been in the south Conejo area since	
3	1963, and I love driving through an area that I really	
4	feel I'm in the country. I love being able to see a	
5	rabbit or a squirrel that passes by. I'm concerned about	
6	the coyotes with my little dog, however I love to know	
7	they are out there. So I'm really concerned that as they	PH-14
8	build these poles we will lose more of our wildlife.	
9	Thank you.	
10	MERCEDES TODESCO: My name is Mercedes Todesco,	
11	and we own the blue house on Read Road, and I want to	
12	remind the commission of some of our concerns.	
13	First, the public health and public health and	
14	safety dangers, which were already well described. There	
15	are also negative physical impacts, in that exposure to	PH-15
16	high voltage is linked to noise-induced hearing loss and	
17	interferes with cochlear implants, which we do have a	
18	senior citizen with such hearing devices at our house.	
19	There are also aesthetic and air-quality issues,	
20	quality-of-life issues in that these above-ground poles	
21	are absolutely hideous. Nobody wants to drive through	PH-16
22	there, drive through a neighborhood with those poles	
23	around, and nobody has to.	
24	So I want to make sure the commission knows that	
25	we support the system alternative where there would be a \checkmark	
	14	

		1
.1	rebuilding of the existing transformers in the substations \uparrow	PH-16
2	already there and to leave the poles alone.	
3	Thank you.	
4	MIKE MANKA: Following Mr. Underwood is Kristi	
5	Brumle I'm sorry. I'm not sure what it says.	
6	CRAIG UNDERWOOD: My name is Craig Underwood and	
7	we have the farm that's boarded by Read Road and Sunset	
8	Valley Road. We are relative newcomers to the valley, but	
9	we love the valley. We have engaged in a process of	
10	working with the nature conservancy to try to create a	
11	conservation easement on the farm so that it would remain	PH-17
12	in farming and open space in perpetuity. We value the	
13	valley the way it is and do not want to see the	
14	high-voltage power lines going along Read Road or Sunset	
15	Valley.	
16	I think there's not been enough consideration	
17	given to the no-project alternative, which I think is the	
18	superior one. I think the basic flaw of the EIR is that	PH-18
19	the goal of the EIR is to make sure that the objectives of	
20	the project are achieved, and I think that is a flawed	
21	goal.	
22	So thank you very much.	
23	MIKE MANKA: The speaker after is Jennifer	
24	Crandall.	
25	KRISTI BRUMLE: Hi and thank you. I'm talking	
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1	about three minutes, two minutes about a certain thing	
2	that is more than just devaluing property and everything	
3	else, it's about rethinking substation development.	
4	I think it's time that Edison embraces more	
5	progressive eco-friendly and environmentally safe	
6	alternatives when constructing substations in communities.	
7	It's time for Edison to stop relying on traditional	PH-19
8	methods to keep up with anticipated energy demands.	
9	Traditional methods do nothing to advance or harness	
10	alternate ways to tap energy sources.	
11	Simply, this substation proposal will drive down	
12	home values, as they already state in their environmental	
13	report, quote: "Edison's proposed substation and several	
14	of the alternatives would degrade the area's visual	PH-20
15	character and public views because of the lines and	
16	poles." According to the report, nothing could be done to	
17	reduce what the report calls "significant and unavoidable	
18	impacts."	
19	Point 1: Many U.S. cities have erected	
20	substations. Analyses from these cities, citing Colorado,	
21	Tennessee, and 25 other significant areas, reported a	
22	negative impact on home values. That is a fact. When our	PH-21
23	values property values go down, will Edison pay for	
24	that? You sell. Do they pay for that? It goes down	
25	25,000. Who pays for that? Because we already know \checkmark	
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1	through these studies I don't know if they brought them \wedge	
2	forward or not. They have never said it decreases values	
3	10 percent, 25 percent, whatever percent. Well, what kind	PH-21
4	of a guarantee when we already know they go down? Who	
5	pays for that? Who?	
6	The next thing is point 2, reference other states	
7	and international countries. I wonder if Edison has	
8	considered all of these examples: Manhattan, New York:	
9	Putting substations underground. Tokyo, Japan: Under	
10	parks. Nagoya, Japan: Stacking under buildings.	
11	Leicester Square, London: Streetscapes. Bronx, New York:	
12	Substations to blend into the communities. Osaka, Japan:	
13	Enclosed substation to look naturally part of the	
14	landscapes.	
15	Edison has failed to look into alternate	PH-22
16	solutions over all the traditional things they have	
17	already done, to say nothing of looking forward to	
18	eco-friendly What should I say? I'm losing my words	
19	solar solar on all of our houses. Whatever it is, they	
20	are relying on doing the same thing, same thing, and I	
21	don't think they have done their due diligence on finding	
22	alternate ways to harness different energy instead of	
23	upgrading ugly things that degrade our community,	
24	neighbors, neighborhoods, and things we have all put money	
25	into. What do our taxes pay for?	
	17	

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1	And I guess the final thing I would say is:	
2	Steve Jobs. He's one person. He has a widget. He has a	
3	megabyte, a byte. He sits and looks at the megabyte or	
4	whatever and says, "I don't know. I don't think we can do	
5	anything with that." But you know what? Look what you	
6	have. You have cellphones, you have iPads, you have	PH-22
7	iPods. You know what? Edison sits on their butts and	
8	they don't even look at alternative ways, solar or	
9	anything else like everyone else embraces, every company,	
10	entity, whatever. I don't think that's enough. So Steve	
11	Jobs, good for you. Edison, work harder.	
12	MIKE MANKA: After Ms. Crandall is Andy Gosser.	
13	JENNIFER CRANDALL: I'm Jennifer Crandall. I'm a	
14	property owner on Read Road, and the several points I want	PH-23
15	to talk about are one of beauty, and the EIR report does	
16	state in it that Read Road was a designated scenic route	
17	in Ventura County. It's not even a two-lane road. It's	
18	just one lane. It doesn't even have a shoulder. In fact,	
19	no one is even allowed to park on one side of the street	
20	because there's no room for emergency vehicles. This	
21	would be an extremely unsafe place to put high-power	F11-24
22	poles. And this is a bicycle route now for Thousand Oaks.	
23	And how do they fit into the safety issue with that	
24	with these poles going up?	-
25	So I think this is a reckless route and whole \int	PH-25
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Comment Letter PH

1	idea by Edison. In fact, I don't know how carefully they \bigwedge
2	thought about this when they came up with this plan. The
3	engineer came to me when I talked to Mr. Gonzales when
4	they sent everybody this brochure and said, "Don't worry,
5	Jennifer, we can tuck these poles in amongst your
6	trees" and these are the trees in our front yard
7	"and you won't even see them. We will hide them. We will
8	work with you and it will be okay." She calls back two
9	weeks later and says, "I'm sorry. I made a mistake. The
10	trees will probably be killed because when we bury the
11	poles in the ground the base of them are going to go
12	30 feet down into the ground and it's going to kill the
13	roots of the trees."
14	So point in fact, if you drive down Thousand Oaks
15	Boulevard, you will see these poles, and if you go for
16	example, if you are at the post office on the other side,
17	the same side of the street as that car wash, there's a
18	big tower like the one you see on the 101. This is what
19	belongs on scenic roads? This is This tower, if you've
20	noticed over the last two years, there were big pine trees
21	in that little carwash area. Those pine trees are now
22	dead. In fact, you will see stumps there now. And I've
23	watched them since this proposal in 2008. Those trees
24	slowly died.
25	These are all of the trees in front of our house \checkmark

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PH-25

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1	in that little one one-lane road. We don't even have a 🔨	
2	room for a center divider on this road. These trees	
3	house we have Great Horned Owls in these trees, we have	
4	Red-Tailed Hawks in these trees. Those will all be	PH-25
5	destroyed. This does affect my land value to my home.	11120
6	And I pay property taxes to the City of Thousand Oaks.	
7	This electricity isn't even going to service Thousand	
8	Oaks, but yet I'm going to suffer.	
9	Also, they are going to get some type of they	
10	are going to have to somehow purchase my front yard	
11	because these towers are going to go over my fence line.	
12	Our hand-welded fence line took a year and a half to	PH-26
13	hand-weld five acres around our private ranch, so these	
14	towers will now be within 100 feet of our bedroom window	
15	and they will have to extend over our fence line.	
16	Over that fence in our front yard is our leach	
17	field and our property is terraced on five acres. Where	
18	are they going to put our leach field? Are they going to	
19	have to design some type of pump for us so we can pump	DU 27
20	everything up to a different level for a new leach field?	F11 - 21
21	There is no place to put a leach field on the other	
22	terraces, so that's huge and they are not even looking at	
23	that. They are just saying, "Okay, this is what we are	
24	going to do."	
25	The other thing that's a safety issue for me is	PH-28
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1	that I train young horses and our round pen is 25 yards
2	from the road. It's very dangerous. These animals are
3	very sensitive to noises and vibrations. I know the
4	Cassars have trainers and young people riding, and all
5	these vibrations and noises and these things going up in
6	the area, even when they trim trees it's very dangerous.
7	I can't imagine how long this project is going to go on
8	and how dangerous it's going to be for what I do with my
9	property, nor the other farms and animals there or the
10	other training grounds. They might even lose their
11	business there because people don't want to deal with the
12	danger that's going on during the construction period.
13	So those are my concerns. And I have been trying
14	to sell my home for three years and this has been a major
15	obstacle. The home values have already come down and I
16	don't even know what would be left if they just go ahead
17	and approve this.
18	The last thing I feel Southern California Edison
19	has been reckless with is that they sent this brochure
20	originally saying that, "We need to build this because we
21	need to be ready when there's increased demand for
22	energy," and they hypothetically drew this line. Remember
23	that flyer that said, "This is where the need is going to
24	be and this is where the need is going to be and this is
25	where the need is going to be"? Well So they drew this
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PH-28

PH-29

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1	line from 2008 on out, but they have never shown us where \wedge	
2	the line was now that we have had the results from 2009	
3	with the demands and 2010, and they know the data and they	PH-30
4	know the data is not consistent with where they put their	
5	hypothetical demand that we needed, so they are not	
6	telling us that part.	
7	There are no needs for this. In fact, we do have	
8	what the demands are. And like Chuck said, they are so	
9	far below where their hypothetical line is. Everybody is	
10	buying different light bulbs, we are not turning on our	
11	air conditioners, we can't afford our electric bill, and	
12	yet they are saying we need this power. There are no more	
13	building sites in Thousand Oaks basically, so where is all	PH-31
14	this demand coming from?	
15	So I think this whole thing needs to be re-looked	
16	at very carefully with this new judge and say there is no	
17	need right now. Because once these big poles go up, they	
18	are not coming down and they've definitely affected our	
19	scenic route and our homes.	
20	Thank you.	
21	MIKE MANKA: The next speaker is George Pappas.	
22	This is Andy.	
23	ANDY GOSSER: Hello. My name is Andy Gosser. I	
24	live right on Olsen Road and my property is directly	PH-32
25	across from the Sunset Hills Golf Course, and the Proposed \bigvee	
	22	

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1	Alternate Plan 2, I believe it is, would put these	
2	monstrosity poles right in my backyard. And as I'm raised	
3	above the road, it would be right at eye level of the view	
4	I paid for in our entire neighborhood, which happens to be	
5	an underground-utility neighborhood.	
6	There's no reason why Alternative 3 can't be	PH-32
7	done, other than money, and I don't think anyone has	
8	explained that, you know, environmentally. What is the	
9	environment? The definition of the environment is the	
10	environment of the people and animals and plants and	
11	scenic areas of our community.	
12	Obviously we are fighting with a huge	
13	bureaucracy. The fact is, EMFs are a factor. They are so	
14	much a factor that who I work for in LA County has gone	
15	around and monitored EMFs at every place of business where	
16	their employees are and have drawn direct conclusions that	
17	certain employees who have gotten brain cancers and other	PH-33
18	cancers directly resulted from EMFs. So we are dealing	
19	with something like Phillip Morris saying, "The smoke is	
20	not hurting you." 20 years down the road they will say,	
21	"Oh, yeah, they do kill you. Sorry they are there."	
22	There are more people in this Alternative Plan 2	
23	than any of the other routes. You have hundreds of homes.	PH-34
24	And by the way, only a few of us were notified of them	
25	trying to put this in there. There has been, I believe, a $\!$	
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Comment Letter PH

1 deliberate effort not to notify all the neighbors that 2 would be affected. There's hundreds of homes in our 3 neighborhood and, just through my neighbors and myself 4 talking to them, none of them were aware of this. In 5 fact, even as recent as last week.

This has not been forthcoming and honest in my 6 7 opinion. It would create a plight in our community. We are a scenic corridor coming into Thousand Oaks. Talk 8 about bicyclists, there's a bicycle lane and a sidewalk 9 going all the way down, and even bike races and numbered 10 events and fundraisers come right down our street. Will 11 12 they come right under the poles? The City has planted a 13 beautiful greenbelt in there with trees. Are they going to remove those and make it a nice concrete area with 14 15 these beautiful power lines?

Everything should be underground. I don't think 16 17 anyone in here would argue that. And if they put it 18 underground, none of us would be here. It wouldn't be an issue. Now, what is the issue? Money. We are being 19 bulldozed by Edison and the Public Utilities Commission, 20 who will not take this into consideration, and there is 21 22 not a legitimate excuse for that. This is about people, 23 our community, our property values. You are talking 10, 20 percent? No, this is going to cut property values by 24 25 hundreds of thousands of dollars. The hit that we have

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PH-34

PH-35

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1 already taken -- my property values have already gone down Λ half along with everybody else's. Are we going to take it 2 another half just in our little neighborhood? 3 We moved here to raise a family. I'm not more 4 5 than 50 feet away from where these power lines are 6 projected to be in this alternative plan. I have five 7 young children. I will be seeking an attorney. I would PH-35 8 like to see another attorney here. But maybe a 9 class-action suit or something. But we have got to stop and stop being patsies to this corporate effort to just 10 11 bulldoze over our community. Because once it's gone, it's 12 gone, and this is one of the scenic areas coming into 13 Thousand Oaks, and I think that -- I think it should be completely underground on a different route. I don't even 14 15 think it should be underground on that alternative route. But one of the other things is, like people 16 17 mentioned, there are a lot of environmental solar options that are -- I'm sure are not considered because, wow, 18 PH-36 Edison has to pay back people who use solar power because 19 it creates a power grid that they have to actually pay the 20 customers back. You sure as heck know they don't want to 21 22 do that. 23 Okay. Well -- And another little thing that I heard tonight, someone else speaking said this affects 24 people that have hearing aids and electrical devices. 25 25

.1	That just rang a bell in me while I was sitting in here. \uparrow
2	I have a neighbor who has been fighting for her hearing.
3	She is a mother of four. She is in my neighborhood right
4	along the street also. She is desperately trying to hold
5	onto her hearing. She has had vertigo and all kinds of
6	complications because of this. She is now getting a
7	cochlear implant, which is a very technical thing, kind of
8	a miracle thing. She'll have a headset that's run by
9	magnets and electrical waves with a brain implant. If
10	this is true also, here you have all these power lines.
11	And I can tell you in my line of work I've seen a
12	lot of problems and I sympathize with this lady and what
13	she was saying about power lines. Almost every fire in
14	Southern California starts from power lines. The Topanga
15	fire and all those, they try to blame it on the other
16	guys, but in the end it came out. It wasn't publically
17	put out there. It was power lines. Everything that hits
18	it causes fires.
19	We have accidents, many different things happen.
20	It's a danger, it's a plight, it's EMFs that they refuse
21	to acknowledge, and I just hope they do this underground
22	thing. The Alternative Plan B sounds like the only thing
23	we could live with. And shame on anyone for even thinking
24	of doing this. It's ignorance and total disregard for our
25	community.

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PH-37

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PH-39

.1	MIKE MANKA: After George is Rebecca Voskanian.
2	GEORGE PAPPAS: The FBI has a saying: "Follow
3	the money and you will find the rat."
4	Does anybody know who Michael Peevey is? Anybody
5	have an idea? One person does. Anybody else? Google the
6	Public Utilities Commission and he is the head.
7	Mr. Peevey and I'm just reading from his bio
8	Mr. Peevey, from '95 to 2000, was president of New Energy,
9	Inc. Prior to that, he was president of Edison
10	International and Southern California Edison beginning in
11	'84. He left in '95 when we passed the deregulation bill.
12	Remember that fiasco? He started New Energy, and what did
13	he do? He sold electricity to infinity affinity-type
14	organizations. Now he's on the Public Utilities
15	Commission.
16	If he followed the NASCAR rule, looking out for
17	the public interest in the NASCAR rule, which is the same
18	thing I believe congress should do, is they should put an
19	emblem on their suits showing who paid them over the years
20	and the constituents they represent. You will see
21	Southern California Gas. You would see Edison. You would
22	see a variety of different utility companies.
23	If you have a concern, go to the PUC website and
24	you can send him an e-mail. I suggest you do that.
25	Follow the money and you find the rat.
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.1	MIKE MANKA: Is Rebecca still here?	
2	After Rebecca is Georgette McBreen.	
3	GEORGE PAPPAS: I'm sorry. Let me add one other	
4	thing. His wife has been a member of the general assembly	
5	and she is now in the senate. It's a family business.	
6	REBECCA VOSKANIAN: Hi. My name is Rebecca	
7	Voskanian. I'm a member of STTOP. I Three years ago I	
8	stood in front of I went to a lot of meetings. I was	
9	pregnant with my second son.	
10	I have two little boys. They are two and almost	
11	six now. They will be building the lines right in front	
12	of my house. In two of the three alternatives, these	
13	lines, these huge towers will still go right in front of	
14	the area where my children play.	PH-40
15	So I have other comments, but that's basically	
16	that's it. I really don't want these power lines and I've	
17	always been opposed to them.	
18	Thank you.	
19	MIKE MANKA: Following Georgette is Elizabeth	
20	Groden.	
21	GEORGETTE McBREEN: I'm so relieved. I thought I	
22	was going to be the last one.	
23	Good evening, everyone. My name is Georgette	
24	McBreen. I'm speaking as a resident of Moorpark, a	PH-41
25	parent, a grandparent, and as a long-time local educator. $$	
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1	I was going to launch into all of my concerns about the
2	beauty of Tierra Rejada Valley and I don't want to see
3	those large power towers any more than anybody else does,
4	but I'm going to launch into beyond my personal concerns
5	about my neighborhood to the larger concern that lies in
6	the placement or the proposed placement of these
7	high-voltage power towers, what I have seen as big power
8	towers down Sunset Valley, down Read Road, and along both
9	sides of where Underwood Family Farms is.

10 I don't know if you have not been there. Most of 11 you hopefully have. This farm is a wonderful resource for 12 schools and families. It's a field trip destination. 13 There's school groups. There's home schoolers. There's 14 mom's clubs. There's friends. There's families. Thev 15 all come to experience the farm firsthand. They don't 16 just grow food there. For the last 12 years, I have 17 personally brought a 120 to 150 parents and children to 18 the farm to pick strawberries in the spring, pumpkins in 19 the fall.

At the farm, children learn how food grows from the ground, pumpkins actually come on vines; they don't come from Vons. That's what kids think. They see animals in person, they pick their own veggies to take home and prepare for a meal with their moms and dads. It's a priceless resource where learning takes place in a way far

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PH-41

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1	superior to books, TV or computers.
2	Myself and fellow staff members collectively, we
3	bring about 700 children every spring and fall to the
4	farm, and we are just one school. On any given day there
5	are dozens of school groups consisting of children
6	preschool- and elementary-age children, parents,
7	grandparents, pregnant moms, babies, with an upwards
8	and I asked this the other day: "About how many people
9	per day in the high season?" There's like 2000 to 2500
10	people visiting there every day.
11	I mean, it is I asked somebody the other day
12	behind me, "Where are you from?" She said, "Culver City."
13	I mean, this is a destination a lot of people come to.
14	With 5,000 I think there's 5,000 annual membership
15	passes, as well as day visitors and the festival-goers who
16	ensure this farm is a magical place where large groups of
17	people gather to learn and to enjoy, and it's a place to
18	be protected and treasured, as it's a huge asset to the
19	community.
20	Now I have to think that if Sunset Valley was a
21	road with a school, it wouldn't even be considered for
22	these power towers and the line placement along there.
23	High-voltage overhead power lines aren't run along school
24	property and for good reason: Because it's a safety
25	issue. No one wants to take risks with the future health $$
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1 of the children. But I must say that this farm offers 2 education every bit as important as a school and it serves more children than any one school: Hundreds on slow days, 3 thousands on busy days. 4 5 These things are supposed to be put where there 6 aren't lots of people, where -- I know you are concerned 7 where you live too, but I'm concerned about the children. 8 The true need for this whole project I believe hasn't been 9 demonstrated, nor have enough alternatives been explored. 10 If you must -- and I hope you don't go forward 11 and this project doesn't proceed -- please place these 12 lines through the valley, if you must, down -- down Sunset 13 Valley. If you are going to, for aesthetic reasons, for 14 fairness, for health and safety reasons, you must place 15 them underground or, as I've listened tonight, reconsider 16 this Alternative Plan B. 17 We as parents, educators and citizens are 18 counting on you to decide on the right thing to do. 19 MIKE MANKA: Following Elizabeth Groden, 20 the last speaker is Gaston Mona. Is Elizabeth Groden 21 here? 22 ELIZABETH GRODEN: Yes, but all of the speakers 23 have basically covered all of the issues, so I'm glad to just sit down and be quiet. 24 25 MIKE MANKA: Okay. It looks like we will have a 31

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3.5-32

1	couple minutes after. If anyone who hasn't spoken has
2	reconsidered and would like to speak, please grab a
3	comment card and we can accommodate that.
4	GASTON MONA: My name is Gaston Mona. I live on
5	Read Road. When I bought the property in 2004, the
6	contractor said, "No worries." He said, "All the power
7	lines are all underground." He said, "Nothing is up there
8	to disrupt your beautiful views." Now they are going to
9	build these huge poles down Read Road.
10	I would like to know I would like to ask the
11	SCE, Southern California Edison to tell us what, if
12	anything, they have done to reduce the demand for
13	electricity. At present it's 300 megavolts and they have
14	400 megavolts, which is 33 percent more than they need.
15	Why is it that they are considering this 66 kilowatt line
16	as an addition? There's no need for it.
17	I read an article recently, and according to the
18	Electric Power Research Institute, which is an
19	organization that's funded by electrical companies, they
20	say the demand of electricity is expected to decline by
21	half of one percent per year for the next ten years. This
22	article was written in September and it was in the
23	Business section of the Ventura County Star.
24	It said, "From 1980 to 2000 residential power
25	demand grew by about two and a half percent per year. \checkmark
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.1	From 2000 to 2010, the growth rate slowed to two percent. \uparrow
2	Over the next year, demand is expected to decline by about
3	half a percent a year, according to the Electrical Power
4	Research Institute, a non-profit group funded by the
5	utility industry. Overall demand, including some
6	factories and businesses, still expected to grow by only
7	seven-tenths of one percent per year," well below the two
8	and a half percent per year that the electric companies
9	want us to believe.
10	There's also a note that says that and that
11	comes from back east "Suddenly faced with shrinking
12	sales, some utilities are asking for changes so they can
13	charge higher rates per kilowatt hour in exchange for
14	helping consumers further reduce consumption, reducing
15	power demand and consumer electric bill at the same time.
16	In California, where utilities pioneered this approach in
17	early 1980, residential power demand has grown at half the
18	nationwide pace over the last three years even though the
19	state population grew at a faster rate than the nation.
20	In general, it is now cheaper for utilities to have
21	customers cut back than to build a power plant."
22	So why do they want to build?
23	We would also like to know why the SCE hasn't
24	looked at the electrical demand for 2011. And the SCE

PH-42

PH-43

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needs to know -- needs to show us what the demand is for

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1 them to request this project. Have they considered a 2 no-project alternative? 3 My suggestion is they should wait at least five 4 years from now, see if there is going to be a need for 5 this. Because truthfully, there's hardly any more places **PH-43** 6 to build homes in Thousand Oaks or Simi Valley, so why do 7 they want to build this thing? I don't think there's a need for it, and I think 8 9 we should reconsider it and wait for five years and come 10 back and see if we need it. 11 Thank you. 12 MIKE MANKA: I have one more speaker, Janet Richards. So let's get through the speakers first, 13 14 please. 15 JANET RICHARDS: Hi. I'll keep it brief. I just 16 wanted to make sure I came and represented our 17 neighborhood. We are located right under the Ronald 18 Reagan Library. We are not the proposed first route with 19 Read Road, and I understand your concerns. And if it has 20 to happen, which it sounds like it really is unnecessary PH-44 21 and this is ridiculous and we have to -- I know this 22 Tuesday morning at 10:00 a.m., I had no idea this meeting 23 was existing, I want our voice heard as well though. 24 I understand your concerns, but one of the 25 comments I heard out and about in the crowd today was, 34

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. I L	"Well, that's a wide-open space, there's no children
2	playing, and it's just wildlife. Who cares?" No, no, we
3	purchased our entire life investment into dirt and built
4	from the ground up. We are a wildlife corridor. We have
5	restrictions. We are not in a tract area. We have
6	restrictions. We can't build anything. We can build
7	certain things, but we cannot divide our property, we
8	can't sell lots off. We are 20 acres. So it looks great
9	that you can just come in and, "Oh, they won't mind." No,
10	we do mind, and I care about Read Road, and I care about
11	all of you, and I want it underground or I don't want it
12	at all, but I don't want to be overlooked because we are
13	in the middle of nothing. It is not nothing. This is a
14	wildlife corridor that is protected. It is for the
15	animals, the greenbelt, the Tierra Rejada Valley
16	greenbelt. We do mean something. \Box
17	And if you want to talk about the Underwood
18	Farms. Look at the library. Do you know how many people
19	come through the library? Okay. They are going to look
20	at power poles? You have a 20-something-million-dollar
21	home that looks down on a power pole? You have families
22	who want to build their dream home under the power poles?
23	So I understand you have existing things, but we
24	have dreams, and this is not what we want to look at or
25	drive by. I don't want you to look at it, I don't want to
	35

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PH-45

.1	look at it, and it doesn't need to exist.	
2	I don't want to come here, not be heard, and all	
3	of a sudden, "Hey, that clear path" No, it is solid	
4	rock. You will end up paying for it, them trying to drill	PH-46
5	30 feet down. No. I understand we are an alternative	
6	route, but I want to be heard. Our neighborhood cares.	
7	We don't want it.	
8	So thank you.	
9	ELIZABETH GRODEN: The only comment I have is	
10	that people mentioned solar, and really solar hasn't come	
11	into its own yet. They haven't perfected the technology	
12	yet.	
13	MIKE MANKA: Do you want to speak to it? And you	
14	are Elizabeth; right?	
15	THE WITNESS: My name is Elizabeth Groden and I	
16	live in Moorpark. I overlook the entrance to the Santa	
17	Rosa Valley, so for me it's absurd for somebody to pick	
18	such a beautiful, pristine area and decide to put up huge	
19	power poles. For me that's ludicrous and it's a travesty	PH-47
20	to destroy an area like that. But I'm not in	
21	technology, but I know that people would like to have	
22	solar and would love to have it when it becomes very]
23	efficient. And I know right now the technology is not	
24	quite there, but I also know that one day somebody	
25	talked about Steve Jobs and one day they will perfect $orall$	
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1	the technology, and when that happens there's going to be	
2	a proliferation of people using solar, so I would assume	
3	that there would be a reduction in the demand.	
4	So I definitely think it's inappropriate and just	
5	ludicrous to destroy a beautiful area. I think they	PH-47
6	should go with upgrading their current equipment in their	
7	current location and I think that everything that they do	
8	from this point forward should be underground.	
9	That's my comment.	
10	MIKE MANKA: I think that brings our comments to	
11	conclusion. I thank you, everybody. We really appreciate	
12	you taking the time out to come here and taking the time	
13	to participate. It adds It's essential to our CEQA	
14	process and it adds tremendous value to our ability to	
15	analyze these projects. So thank you very much.	
16	(Proceedings concluded.)	
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1	I, the undersigned, a Certified Shorthand
2	Reporter of the State of California, do hereby certify:
3	That the foregoing proceedings were taken before
4	me at the time and place herein set forth; that a verbatim
5	record of the proceedings was made by me using machine
6	shorthand which was thereafter transcribed under my
7	direction; further, that the foregoing is an accurate
8	transcription thereof.
9	I further certify that I am neither financially
10	interested in the action nor a relative or employee of any
11	attorney of any of the parties.
12	IN WITNESS WHEREOF, I have this date subscribed
13	my name.
14	
15	Dated: November 14, 2011
16	(marilm /)
17	V/I/W/II, (MMW
18	GINA M. CURRIE CSR No. 8429
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3.5.1 PH – Responses to Comments from Public Hearing

- PH-1 The commenter does not comment on the adequacy of the Draft EIR. The commenter expresses concerns about the safety of overhead power lines and provides details regarding incidences where power lines have caused fires. As disclosed in the Draft EIR discussion for Impact 4.8-7 (see Draft EIR page 4.8-23), the Proposed Project could increase the risk of wildland fires in the southern portion of the project area. However, implementation of the Proposed Project would not result in a significant risk of loss, injury, or death involving wildland fires; therefore, operational impacts would be less than significant. The commenter is referred to Draft EIR Section 4.8 Hazards and Hazardous Materials for a discussion and analysis of fire hazards.
- PH-2 The commenter expresses concerns about the analysis of the No Project Alternative, demand projections used for the Draft EIR, and the lack of analysis of a demand management alternative. Please see Section 3.3.6, Response I6-2, Master Response 1, *Alternatives* and Master Response 2, *Non-CEQA Issues* in Section 3.1 for responses to these issues.
- PH-3 See Response I6-3 in Section 3.3.6.
- PH-4 See Response I6-4 in Section 3.3.6.
- PH-5 The commenter expressed concerns about SCE rate approvals and solar initiatives and does not comment on any issue regarding the adequacy of the Draft EIR. This comment is noted.
- PH-6 The commenter expressed concerns about rate increases and does not comment on any issue regarding the adequacy of the Draft EIR. This comment is noted.
- PH-7 See Section 3.3.6, Response I6-6.
- PH-8 The commenter concurred with the Draft EIR's finding that System Alternative B met all legal, regulatory, and technical feasibility criteria. The commenter is referred to Master Response 1, *Alternatives*, in Section 3.1.1 for more information. Based on the new information provided by SCE, the CPUC has determined that System Alternative B and its need to convert existing substations in the ENA to larger-sized transformers is not a technically feasible alternative to the Proposed Project (see Appendix J).
- PH-9 The commenter noted their participation in the parallel ALJ tract. This comment is noted.
- PH-10 The commenter endorses System Alternative B on behalf of Josh Valdez and the Valdez family. The commenter also supported undergrounding any subtransmission lines that may be required. The commenter is referred to Section 3.1.1 Master Response 1, *Alternatives,* and Master Response 3, *Undergrounding* for additional information.

- PH-11 The commenter expresses support for System Alternative B and is referred to Section 3.1.1 Master Response 1, *Alternatives* for additional information. The commenter also mentions undergrounding subtransmission lines and is referred to Master Response 3, *Undergrounding* in Section 3.1.3.
- PH-12 The Proposed Project would not result in significant impacts to wildlife movement corridors. For potential impacts to wildlife linkages (i.e., corridors) see Response A6-3 in Section 3.2. Potential impacts to designated critical habitat for coastal California gnatcatcher, Riverside fairy shrimp, and Lyon's pentachaeta are discussed in the Draft EIR. See Draft EIR Section 4.4 for an analysis on wildlife movement and corridors on Draft EIR pages 4.4-6 to 4.4-7 and Impact 4.4-7 on page 4.4-41. The Draft EIR states that "The Proposed Project is located within an area that has natural features conducive to a wildlife corridor connecting larger areas of open space in the north, east, and west. The project area was identified by the South Coast Missing Linkages Project (Penrod et al., 2006) as a potentially important north-south migration corridor for a number of important species indicative of overall ecosystem health. Given the small size of the Proposed Project as discussed in the regional wildlife movement, the Proposed Project is not expected to greatly hinder regional wildlife movement between these larger areas of open space, or to significantly alter current patterns of wildlife movement. This impact is less than significant (Class III)."
- PH-13 The commenter expresses support for System Alternative B and is referred to Section 3.1.1 Master Response 1, *Alternatives* regarding alternatives considered for the Proposed Project, including energy conservation.
- PH-14 The commenter expresses concerns about the Proposed Project affecting local wildlife. The commenter is referred to Section 4.4 of the Draft EIR for the analysis of the Proposed Project's potential impacts on wildlife. Impacts to wildlife would be less than significant with mitigation. See Impact 4.4-2 for impacts to special status wildlife species from construction activities, Impact 4.4-3 for impacts to migratory birds from construction activities, Impact 4.4-4 for impacts to raptors from operation, Impact 4.4-5 for impacts from construction to gnatcatcher habitat, and Impact 4.4-7 for impact associated with wildlife migration.
- PH-15 The commenter expresses concerns about noise induced hearing loss and interference with cochlear implants. The commenter is referred to Section 3.3.21, Response I21-5 for a detailed response to these issues.
- PH-16 The commenter expresses general concern about the aesthetics, air quality, and quality of life issues associated with the visual appearance of the poles and supports an alternative that rebuilds the existing substations. See Draft EIR Section 4.1 for an analysis on visual resources and Section 4.3 for an analysis on air quality. The commenter also expresses support for System Alternative B and is referred to Master Response 1, *Alternatives* for a discussion on this issue.

- PH-17 The commenter expresses general opposition to the proposed subtransmission alignments on Read Road and Sunset Valley Road. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- PH-18 The commenter expresses concern about the level of attention given to the No Project Alternative. The commenter is referred to Section 3.1.1 Master Response 1, *Alternatives* and Response I29-1. The commenter also expresses concerns about the goals established for the Draft EIR. Per Public Resource Code Section 21002.1:

§ 21002.1. USE OF ENVIRONMENTAL IMPACT REPORTS; POLICY In order to achieve the objectives set forth in Section 21002, the Legislature hereby finds and declares that the following policy shall apply to the use of environmental impact reports prepared pursuant to this division:

(a) The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

As can be seen from this stated purpose, the purpose of an EIR is not to see that the objectives of a project are achieved. Rather the purpose of an EIR is to ensure that significant environmental impacts are identified and feasible alternative and mitigation measure imposed to avoid or reduce those impacts. In accordance with CEQA Guidelines Section 15126.6, project objectives are used, among others, to evaluate the feasibility of a proposed alternative since in order to be viable; an alternative must meet most of the basic project objectives.

- PH-19 The commenter does not comment on the adequacy of the Draft EIR. The commenter promotes progressive, eco-friendly and environmentally safe alternatives when constructing substations. In accordance with CEQA Guidelines Section 15126.6, the feasibility of an alternative must be evaluated or judged against, among others, its ability to accomplish most of the basic project objectives. If an alternative cannot achieve most of the basic project objectives, then it is not a viable alternative and need not to be considered in detail in an EIR. Increasing the generation of renewable energy would not meet the basic project objective of meeting long term electrical demand or improving electrical system operational flexibility and reliability. The commenter is referred to Section 3.1.1 Master Response 1, *Alternatives* for a discussion of renewable energy and demand side management alternatives considered in the Draft EIR.
- PH-20 The commenter expresses concerns that the Proposed Project would drive down home values as the visual character of the area and public views would be degraded. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2.
- PH-21 See Response PH-20.

- PH-22 The commenter expresses concerns that SCE should look at other solutions to the Proposed Project including undergrounding and solar energy. The commenter does not comment on the adequacy of the Draft EIR. The commenter is referred to Master Response 3, *Undergrounding* in Section 3.1.3 for a discussion on undergrounding the subtransmission lines and Master Response 1, *Alternatives* in Section 3.1.1 for a discussion on renewable energy alternatives considered in the Draft EIR but rejected from full evaluation.
- PH-23 See Response I5-9 in Section 3.3.5.
- PH-24 See Response I5-12 regarding traffic safety concerns on Read Road in Section 3.3.
- PH-25 Regarding impacts to trees and nesting birds on Read Road, see Draft EIR Section 4.4, *Biological Resources*, and Response I5-10. Based on the Certified Arborist Assessment that was performed for the project, excavation from the Proposed Project could potentially damage trees along the proposed alignment. Damage to trees could result in compaction, root exposure, root damage or trimming resulting in degradation of an individual tree or loss of trees (BioResource Consultants, Inc., 2011). Prior to construction, SCE and/or its contractors would be required to identify any trees that would interfere with the construction of the Proposed Project and consult with local municipalities prior to any tree alteration or removal. If protected trees cannot be avoided, SCE shall consult with a certified arborist and obtain permits consistent with the requirements of the relevant agency or municipality. Thus, construction of the Proposed Project would not conflict with local policies and ordinances protecting trees. See also Response A14-30, and Response SCE-30.

Regarding aesthetic impacts to Read Road, a designated scenic roadway, see Draft EIR Section 4.1, *Aesthetics*. Impacts to Read Road were found to be less than significant with mitigation. For concerns about electrical demand see Master Response 1, *Alternatives* in Section 3.1.1 and concerns about property values, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2.

PH-26 The commenter states that the proposed subtransmission alignment would go over her property fence line. However, the portion of the proposed subtransmission alignment on Read Road would be within the existing ROW. Draft EIR Section 2.6, *Rights-of-Way Requirements*, discusses existing and new easements required for construction of the Proposed Project. As stated in the top paragraph of page 2-29:

"The proposed subtransmission alignments would be located within existing road ROW, currently being used for 16 kV distribution. However, some areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross-arms and wires, and may require additional rights depending on final engineering." The commenter is also referred to Response I5-10 for additional information on SCE's easement on Read Road.

- PH-27 The commenter expresses concern that the Proposed Project would affect her leach field as the towers would extend over her fence line. As discussed above, the alignment on Read Road would be within existing ROW and therefore would not impact improvements on private property. The septic systems functionality would not be impacted. See Response I5-6 for additional information.
- PH-28 See Response I5-11 in Section 3.3.5.
- PH-29 Regarding property values, see Master Response 2, Non-CEQA Issues in Section 3.1.2.
- PH-30 Regarding project need, see Master Response 2, *Non-CEQA Issues* in Section 3.1.2. Regarding electrical demand, see Master Response 1, Alternatives, in Section 3.1.1.
- PH-31 Regarding project need, see Master Response 2, Non-CEQA Issues in Section 3.1.2.
- PH-32 The commenter expresses opposition to Alternative Subtransmission Alignment 2 for aesthetic reasons, and support for Alternative Subtransmission Alignment 3. Construction-related impacts associated with both alternatives would be similar to the Proposed Project. For operations, impacts to visual resources associated with Alternative Subtransmission Alignment 2 would be greater than the Proposed Project as the alternative alignment would parallel Olsen Road for approximately 2.7 miles, adjacent to all six designated scenic vistas, resulting in significant, unavoidable impacts. Impacts associated with operation of Alternative Subtransmission Alignment 3 would be substantially less than those associated with the Proposed Project and Alternative Subtransmission Alignment 2 as a result of the undergrounding of portions of the subtransmission lines. See the analysis of visual impacts in Draft EIR Section 4.1, *Aesthetics* for a complete discussion of impacts. The commenter is also referred to Master Response 1, *Alternatives* in Section 3.1.1.
- PH-33 See Master Response 2, Non-CEQA Issues, in Section 3.1.2.
- PH-34 The commenter expresses concerns about the number of residences along Alternative Subtransmission Alignment 2 and also expresses concerns about the noticing efforts associated with the Proposed Project. The commenter is directed to Draft EIR Section 1.4 *Public Review and Comment* for a complete description of outreach efforts. There have been numerous efforts to educate the local public about the Proposed Project and to solicit comments and concerns. The CPUC held an educational workshop and scoping session in Thousand Oaks, CA on Tuesday, March 3, 2009, published and distributed a Notice of Preparation on Friday, February 17, 2009, and provided several public notices for the supplemental scoping process. On Wednesday, August 25, 2010, the CPUC published and distributed a letter to notify interested local, regional, and State agencies, and the public, that the Project Description for the Proposed Project had changed and published
legal advertisements regarding this topic in the Ventura County Star on Thursday, August 26, 2010 and Saturday, September 11, 2010. The CPUC conducted a supplemental scoping meeting on Tuesday, September 14, 2010. Finally, the CPUC circulated the Draft EIR to local, State and federal agencies and to interested individuals for a 61-day public review period. The CPUC met and exceeded its noticing requirement pursuant to the CEQA Guidelines.

- PH-35 The commenter expresses general opposition to the Proposed Project for reasons pertaining to aesthetics, bicycle routes, and property values. The commenter further expresses support for undergrounding the proposed subtransmission alignment along a different route than the one proposed by Alternative Subtransmission Alignment 3. Regarding impacts to visual resources see Draft EIR Section 4.1, *Aesthetics*. Regarding bicycle routes see Draft EIR Section 4.15, *Transportation and Traffic*. Regarding property values, see Section 3.1.2 Master Response 2, *Non-CEQA Issues*. Regarding considered project alternatives, see Section 3.1.1, Master Response 1, *Alternatives*.
- PH-36 See Master Response 1, Alternatives in Section 3.1.1.
- PH-37 See Response I21-5 in Section 3.3.21 for a detailed response on issues related to hearing aids. The commenter expresses concerns about the safety of overhead power lines and provides details regarding incidences where power lines have caused fires. As disclosed in the Draft EIR discussion for Impact 4.8-7 (see Draft EIR page 4.8-23), the Proposed Project could increase the risk of wildland fires in the southern portion of the project area. However, implementation of the Proposed Project would not result in a significant risk of loss, injury, or death involving wildland fires; therefore, operational impacts would be less than significant. The commenter is referred to Draft EIR Section 4.8, *Hazards and Hazardous Materials*, for a discussion and analysis of fire hazards.
- PH-38 The commenter expresses concerns about EMFs and expresses support for System Alternative B. See Master Response 2, *Non-CEQA Issues* in Section 3.1.2 for a discussion on EMF and Master Response 1, *Alternatives* in Section 3.1.1 for information on System Alternative B.
- PH-39 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- PH-40 The commenter expresses opposition to Proposed Project and Alternatives due to the proximity to her residence and play area for her children. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- PH-41 Regarding impacts to the Tierra Rejada Greenbelt, see Response A5-5 in Section 3.2.
 Regarding visual impacts to Underwood Family Farms, please see Draft EIR Section 4.1, *Aesthetics*, pages 4.1-26, 4.1-30, and 4.1-59. Given the visual sensitivity of Underwood Family Farms (moderate-to high), impacts to visual resource would be adverse and

potentially significant. However, implementation of Mitigation Measure 4.1-8 would reduce impacts to less than significant. Regarding aesthetic impacts to Sunset Valley Road, please see Draft EIR Section 4.1, *Aesthetics*, Impact 4.1-8. Regarding safety issues, see Draft EIR Section 4.8, *Hazards and Hazardous Materials*. Regarding System Alternative B and undergrounding, see Master Response 1, *Alternatives* in Section 3.1.1, and Master Response 3, *Undergrounding* in Section 3.1.3, respectively.

- PH-42 The commenter is directed to Master Response 1, *Alternatives* in Section 3.1.1 for information about electrical demand.
- PH-43 The commenter is directed to Master Response 1, *Alternatives* in Section 3.1.1 for information about demand. The No Project Alternative was included in the analysis for each section under Alternatives. For example, see Draft EIR Section 4.1.5, *Alternatives* in the Draft EIR. See Response A6-3 for a discussion on wildlife corridors.
- PH-44 This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- PH-45 See Master Response 3, Undergrounding in Section 3.1.3.
- PH-46 The commenter expresses opposition to Alternative Subtransmission Alignment 1 for aesthetic reasons. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR. This comment is noted.
- PH-47 The commenter expresses support for System Alternative B and mentions undergrounding and solar energy. The commenter is referred to Master Response 1, *Alternatives* in Section 3.1.1 and Master Response 3, *Undergrounding* in Section 3.1.3.

References – Chapter 3

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- City of Simi Valley, 2006. City of Simi Valley Municipal Code, adopted in January 2006.

- City of Simi Valley, 2007. Simi Valley General Plan Update, Final Technical Background Report, published in October 2007.
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- SCE, 2011. Southern California Edison, Environment: Committed to Environmental Protection, www.sce.com/PowerandEnvironment/default.htm, accessed September 6, 2011.
- SCE, 2012a. Southern California Edison. Data Response ED-09, July 17, 2012.
- SCE, 2012b. Southern California Edison. Data Response ED-08, March 19, 2012.
- SCE, 2012c. Southern California Edison. Data Response ED-10, September 20, 2012.
- SCE, 2012d. Southern California Edison. Data Response ED-7, February 24, 2012.

CHAPTER 4 Revisions to the Draft EIR

4.1 Introduction

Pursuant to CEQA Guidelines Section 15132, this section presents the changes that were made to the Draft EIR to clarify or amplify its text in response to received comments. Such changes are insignificant as the term is used in CEQA Guidelines Section 15088.5(b), in that the changes merely clarify or amplify or make insignificant modifications.

The changes are grouped by Draft EIR chapters and are then shown by page number in the Draft EIR and identified as to the location of the change in the body of the text or table.

For clarity purposes Appendix J contains the Final Mitigation Monitoring, Reporting, and Compliance Program (MMRCP). Consequently, clarification to mitigation measures in addition to being listed here, are included in the MMRCP in Appendix J.

Where changes are shown inserted in the existing Draft EIR text, revised or new language is <u>underlined</u>, deleted language is indicated by strikethrough text, and the original text is shown without underline or strikethrough text.

4.2 Text Changes

Page Identification / Text Change

Executive Summary

ES-1 Under the heading **ES.1 Introduction / Background**, the last sentence of the third paragraph has been amended as follows:

Based on this evaluation and the documentation which follows, this Draft EIR identifies <u>a combination of Alternative Substation Site B with Alternative</u> <u>Subtransmission Alignment 3</u> System Alternative B as the Environmentally Superior Alternative.

ES-3 Under the heading **ES.1.1 Proposed Project**, the first bullet point has been revised as follows:

- Construction of a new 66/16 kV distribution substation (proposed Presidential Substation) on an approximately 4-<u>5.4</u>-acre <u>site with 2.5 acres of disturbed area;</u>
- **ES-3** Under the heading **SCE's Proposed Project Objectives**, the following reference has been revised:

The objectives of the Proposed Project are defined by SCE in its PEA and subsequent information (SCE, 2008 <u>;SCE 2012a, b and c</u>).

ES-3 Under the heading **SCE's Proposed Project Objectives**, the first bullet point has been revised as follows:

• Meet long term electrical demand requirements in the ENA beginning in 2011 and extending beyond 2014 in order to meet 10 year planning criterion; electrical needs area (ENA) as defined in the proponents application, PEA, and supplemental information;

ES-4 *Table ES-1*, has been revised as follows:

Construction of a new 66/16 kV low-profile distribution substation (Proposed Presidential Substation) on an approximate four-acre5.4 acre-site

- Install one 66 kV switchrack
- Install five 66 kV circuit breakers and disconnect switches
- Install two 28-ampere (MVA), 66/16 kV transformers
- Install two 16 kV, 4.8 megavolt-ampere reactive (MVAR) capacitor banks
- Install one 16 kV low-profile switchrack
- Install one TSP and one TSP Riser subtransmission poles
- Install one vault outside northwest corner of proposed Presidential Substation perimeter wall
- Install four underground16 kV distribution getaways
- Install lighting
- Construct one Mechanical and Electrical Equipment Room (MEER)
- Construct perimeter wall and gategates
- Construct proposed Presidential Substation access driveway from Olsen Road
- Construct acceleration and deceleration lanes on Olsen Road
- Install site drainage
- Upgrade subtransmission (66 kV) relays at Royal and Moorpark Substations

Remove existing poles and construct new subtransmission poles and underground distribution facilities; install 66kV subtransmission conductor to proposed Presidential Substation

- Remove approximately 89 existing wooden 16 kV distribution poles and four 66 kV subtransmission poles
- Install approximately 66 steel subtransmission poles with polymer insulators within existing road ROW (25 TSPs, of which two are already described in the substation section above, and 41 light weight eircular poles (LWS) poles)
- Install 66 kV conductor (i.e., 2000 thousand circular mil (kcmil) copper) in new underground facilities beneath Hwy23.
- Install 66 kV conductor (i.e., 954 Stranded Aluminum (SAC) and 954 Aluminum Core Steel Reinforced (ACSR) on new subtransmission poles from subtransmission supply lines to the proposed Presidential Substation (except for the Hwy 23 crossing)
 - Double-circuit 66 kV subtransmission line from proposed Presidential Substation west to the junction of Read Road and Sunset Valley Road. (1.5 miles), within existing and/or upgraded ROW (including under Hwy 23)

- Single-circuit 66 kV subtransmission line from junction of Read Road and Sunset Valley Road west adjacent to Read Road to the Moorpark-Thousand Oaks No. 2 (0.8 mile), within existing road ROW
- Single-circuit 66 kV subtransmission line from junction of Read Road and Sunset Valley Road north adjacent to Sunset Valley Road to the Moorpark-Royal No. 2 (1.0 mile), within existing road ROW
- Construct new access roads or improve existing roads for construction and maintenance of subtransmission facilities <u>within existing and/or new ROW</u>.

Relocation of existing distribution conductor

- Transfer existing 16 kV distribution line onto new subtransmission poles or to newly constructed underground facilities:
 - For existing 16 kV distribution facilities along or near the double-circuit 66 kV subtransmission line, install new
 underground distribution facilities along or near portions of the 66 kV subtransmission route
 - For existing 16 kV distribution facilities along or near the single-circuit 66 kV subtransmission line, transfer or upgrade distribution facilities to the new 66 kV subtransmission poles. Upgrades to new 16 kV distribution would involve installation of new conductors instead of re-hanging or burying the existing 16 kV conductor
 - Existing 16 kV facilities would be undergrounded to create space for new subtransmission facilities at the intersections of Read Road and Moorpark Road and at Sunset Valley and Tierra Rejada Road
- Install two new street light poles to replace existing streetlights located on wooden 16 kV distribution poles
- Construct new access roads for construction and maintenance of underground facilities.
- **ES-5** Under the heading **Basic Project Objectives as defined by the CEQA Team**, the first bullet point has been revised as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, <u>PEA</u>, and <u>supplemental information</u> and <u>PEA</u> (SCE, 2008 and 2012a, b and c); and
- **ES-6** Under the heading **ES.1.2 Summary of Public Involvement Activities**, the third bullet point has been removed:

On Tuesday, March 3, 2009 following the educational workshop

ES-8 Under the heading **ES.2** Alternatives, the following paragraph has been amended:

In total, the alternatives screening process has culminated in the identification and screening of approximately fivefour potential alternatives for SCE's Proposed Project (not including combinations of alternative components): three alternative subtransmission alignments including a partial undergrounding alternative, <u>and</u> one alternative substation site, and one system alternative that would upgrade existing substations.

ES-8 Footnote 2 has been added at the bottom of the page:

2 The Proposed Project is subject to CPUC General Order No.131-D, Section XIV.B, which preempts local jurisdictions from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. See Chapter 4, Introduction of Environmental Analysis for a discussion of General Order No. 131-D. **ES-10** Under the heading Alternative Subtransmission Alignment 1, the last sentence of the second paragraph has been amended as follows:

Both the <u>The</u> subtransmission, <u>telecommunications</u>, and 16 kV distribution circuits would be constructed underground at the Hwy 23 crossing. <u>The subtransmission</u> <u>line would be constructed underground at the Hwy 23 crossing and would require</u> <u>new underground conduit and structures</u>. <u>The 16 kV distribution circuits and</u> <u>telecommunication lines would be constructed in existing underground conduit and structures</u>.

ES-10 Under the heading Alternative Subtransmission Alignment 1, the third paragraph has been amended as follows:

For 1.8 miles, the alignment would cross generally overland requiring new ROW up to 25 feet wide <u>as well as additional land rights for access that may not follow the subtransmission line</u>. The alignment would terminate at the substation-site entering the substation from directly north. For the proposed substation site, the lines would enter from the north. It is anticipated for Alternative Substation Site B, the lines would enter from either the west or the south. A new telecommunication line and 16 kV distribution circuit would be installed on the new LWS poles. The 16 kV and telecommunication lines would be underground at the intersections of Moorpark Road and Read Road as well as Esperance Road and Tierra Rejada Road to make clearance for the new 66 kV line segment.

ES-10 Under the heading Alternative Subtransmission Alignment 1, the fourth paragraph has been revised as follows:

Construction methods and duration would be similar to those described for the Proposed Project. With the additional access roads and potential water crossings, the construction duration is anticipated to be longer than the Proposed Project.

ES-11 Under the heading Alternative Subtransmission Alignment 2, the third paragraph has been amended as follows:

The second source line would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Madera Road and Tierra Rejada Royal Avenue in the City of Simi Valley, and follows Madera Road to the substation sites.

ES-11 Under the heading Alternative Subtransmission Alignment 2, the fourth paragraph has been amended as follows:

Due to the curvatures in Olsen and Madera Roads, the subtransmission structures along this alignment could require additional support mechanisms such as anchors and guy wires, which could be located on both sides of the roadway. Poles located

inon a curve or corner along the alignment would require some form of guying to provide additional support. Guying typically consists of a guy wire attaching a pole to a buried anchor or a shorter guy pole to provide additional stability. The use of a guy wire requires adequate space for the wire to attach to the ground at a location that provides adequate stability. Guy poles are used in situations where support is needed across a roadway or where space is constrained. In addition to reducing the lateral space needed to provide a pole added stability, guy poles provide the clearance needed for the safe passage of vehicles and can be used to avoid removing vegetation. To minimize the number of guy wires crossing the road, the subtransmission alignment would be designed to cross the roadway at certain locations so that most, or ideally all, of the guying would be located on the same side of the roadway as the subtransmission line. While overhead facilities could be located on both sides of the roadway in a given alignment, it would not occur such that facilities would run parallel to one another and clutter the road ROW on both sides.

ES-11 Under the heading Alternative Subtransmission Alignment 2, the following sentence has been amended:

While conductor <u>Conductor</u> pulling and preparation of pull and tension sites would be similar to the Proposed Project.

ES-11 Under the heading Alternative Subtransmission Alignment 2, the following paragraph has been added before the last paragraph:

<u>A telecommunication line would be required for this alternative. The</u> <u>telecommunication line would travel west from the Presidential Substation site</u> <u>under Hwy 23 and along Read Road. Modification of access roads east of Hwy 23</u> <u>could also be necessary as would some potential tree removal and/or tree trimming.</u>

ES-12 Under the heading Alternative Subtransmission Alignment 3, the fourth paragraph has been amended as follows:

Once the double-circuit subtransmission line reaches the east side of Hwy 23, the line would continue underground to the new substation, where it would enter the substation either underground or via a TSP Riser Pole located outside the substation.

ES-12 Under the heading Alternative Subtransmission Alignment 3, the fifth paragraph has been amended as follows:

Additionally, a telecommunication line would be installed on the existing wood 16 kV distribution poles. The construction of a Hilfiker retaining wall and widening of access roads identified for pole removal and installation would not be required under this alternative. Under this alternative, additional groundwork

would be required compared to the Proposed Project. For the portion of the alignment that will be undergrounded (from the intersection of Read Road and Sunset Valley Road heading east), SCE would construct a large flat pad to accommodate construction vehicles, turnaround areas, crane pad areas for installing the vault, and access roads for construction and maintenance. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunication line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

ES-13 Under the heading Alternative Substation Site B, the following sentence has been amended:

Alternative Substation Site B would construct a new 66/16 kV substation on an approximate $\frac{2.35.29}{2.35}$ acre parcel of land located on the north site of Madera Road in the City of Simi Valley.

ES-13 The discussion of System Alternative B has been removed:

System Alternative B

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment could need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.

Rationale for Full Analysis

This alternative would meet the basic project objectives. It would also meet all legal, regulatory and technical feasibility criteria. This alternative would eliminate significant impacts on noise, air quality and aesthetic resources.

- **ES-15** Under the heading **ES.3.2** Applicant Proposed Measures, the following bullet point has been added following APM-BIO-02:
 - <u>APM-BIO-03: Additional Biological Resource APMs.</u> SCE may propose additional biological resource APMs following receipt of results of focused surveys that would be conducted as part of the Proposed Project, and consultation with appropriate agencies.
- ES-16 Under the heading ES.3.2 Applicant Proposed Measures, the second to last sentence of APM-PAL-01: Develop and Implement a Paleontological Monitoring Plan has been amended as follows:

The Paleontological Monitoring Plan shall also include a final monitoring report provision for the preparation of a final report at the conclusion of the project. If fossils are identified, the final monitoring report shall contain an appropriate description of the fossils, treatment, and curation.

ES-17 Under the heading ES.4.1 Methodology, the second sentence of the second paragraph has been amended as follows:

Based on alternatives suggested during scoping, an intensive evaluation process was completed that resulted in the determination that the EIR would analyze three alternative alignment variations, <u>and one alternative substation site</u>, and one system alternative.

ES-18 The System Alterative B row has been removed from Table ES-2 Summary of Significant Unavoidable (Class I) Environmental Impacts:

System Alternative B Aesthetics less than significant: Class Laesthetic impacts would be eliminated.

Air Quality – less than significant: Construction impacts in Ventura County associated with potential violation of ozone air quality standards and cumulatively considerable levels of NOx.

Noise – less than significant short-term construction impacts: Class I noise impacts in Ventura County would be eliminated. Unlike the Proposed Project and Alternative Substation Site B, this alternative would result in long-term operational impacts at the Thousand Oake Substation. However, these impacts would be mitigated to less than significant.

ES-19 Under the heading ES.4.2 Summary of Significant (Class I) Unavoidable Impacts, the following text has been removed:

One or more of these significant unavoidable impacts were also identified for each of the alternative subtransmission alignments and the alternative substation site. System Alternative B would result in no unavoidable impacts.

ES-19 Under the heading **ES.4.3 Environmentally Superior Alternative**, the first paragraph has been revised as follows:

The selection of an Environmentally Superior Alternative is based on differences in intensity and duration of significant impacts. Based on these differences the identified <u>environmentally superior alternative is System Alternative B. This alternative would not result in any significant unavoidable impacts. System Alternative B, which does not involve the construction of a new substation, would meet most of the basic project objectives but would result in reduced operational flexibility and reliability compared to the Proposed Project, and other alternatives which involve construction of a new substation. All other alternatives would result in at least one significant unavoidable impact. a combination of Alternative Substation Site B with Alternative Subtransmission Alignment 3. The Environmentally Superior Alternative would meet most basic project objectives but would still result in significant unavoidable (Class I) temporary impacts related to air quality and noise; however, neither the substation nor the subtransmission alignment would result in permanent significant unavoidable impacts on aesthetics.</u>

ES-19 Under the heading **ES.4.4 Environmentally Superior Alternative vs. No Project** Alternative, the first paragraph has been revised as follows:

The Environmentally Superior Alternative (System Alternative B Alternative Substation Site B with Alternative Subtransmission Alignment 3) would result in less-than-significant impacts on aesthetics, noise and air quality resources and would have but would still result in significant unavoidable (Class I) temporary impacts related to air quality and noise, with minimal long- term impacts on residences.

ES-21 *The title of* **Table ES-3** *has been updated as follows:*

TABLE ES-3 SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES <u>PROPOSED PROJECT</u>

- ES-21 Table ES-3 has been amended as shown on the following pages.
- **ES-40** *The title of Table ES-4 has been updated as follows:*

SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE

TABLE ES-3 SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact			
Aesthetics	Aesthetics					
Impact 4.1-2: The Proposed Project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a county scenic highway. Less than significant with mitigation	Class II	 Mitigation Measure 4.1-2a: For all <u>pole</u> structures that are visible from viewsheds where visual impacts are significant (i.e., Highway 23, Read Road, and Underwood Family Farms, and Olsen Road), SCE shall install tubular steel poles or light-weight steel poles made of self-weatherizing steel, which would oxidize to a natural-looking rust color within approximately one year. SCE shall apply surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape. For structures that are visible from one or more sensitive viewing locations, the darker colors shall be selected, because darker colors tend to blend into landscape more effectively than lighter colors, which may contrast and produce glare. At locations where a tubular steel pole or light-weight steel pole would be silhouetted against the skyline, non-reflective, light-gray colors shall be selected to blend with the sky. SCE shall develop a Structure Surface Treatment Plan for the tubular steel poles, light-weight steel poles, and any other visible structures in consultation with a visual specialist designated by the CPUC, as appropriate, to ensure that the objectives of this measure are achieved. SCE shall submit the Structure Surface Treatment Plan to the CPUC for review and approval at least 90 days prior to the start of construction. Mitigation Measure 4.1-2b: The subtransmission line conductors shall be non-refractive. Mitigation Measure 4.1-2c: Prior to the start of construction of the retaining wall and reinforced geogrids visible from Highway 23, SCE will submit to the City of Thousand Oaks a landscaping plan and wall design, as part of the 				
Impact 4.1-3: The Proposed Project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a city-designated scenic highway. <i>Significant unavoidable</i>	Class I	Intermediate of the Proposed Project.Mitigation Measure 4.1-3a: Implement Mitigation Measure 4.1-2b.Mitigation Measure 4.1-3b: Implement Mitigation Measure 4.1-2a. For all structures that are visible from Olsen Road, SCE shall install tubular steel poles or light-weight steel poles made of self-weatherizing steel, which would oxidize to a natural-looking rust color within about one year.Alternately, in lieu of installing self-weatherizing steel poles SCE may install standard tubular steel or light-weight steel poles and apply surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape. For structures that are visible from one or more sensitive viewing location, the darker color shall be selected, because darker colors tend to blend into landscape more effectively than lighter colors, which may contrast and produce glare. At locations where a tubular steel pole or light-weight steel pole would be silhouetted against the skyline, non-reflective, light gray colors shall be selected to blend with the sky. SCE shall develop a Structure Surface Treatment Plan for the tubular steel poles, light-weight steel poles, and any other visible structures.	The proposed Presidential Substation and proposed subtransmission alignments would be against natural landscapes and demand viewer attention on Olsen Road, a City of Thousand Oaks designated Scenic Highway. Despite mitigation to reduce visual contrast between the scenic character of the existing landscape and the Proposed Project, significant impacts would be unavoidable.			

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Aesthetics (cont.)			
Impact 4.1-5 ¹ : Construction of the proposed Presidential Substation could result in a temporary adverse impact to visual quality. <i>Less than</i> <i>significant with mitigation</i>	<u>Class II</u>	Mitigation Measure 4.1-5: The temporary fencing used during construction at the Presidential Substation site shall incorporate aesthetic treatment through use of appropriate, non-reflective materials, such as chain link fence with light brown or green vinyl slats. SCE shall submit final construction plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days prior to the start of construction.	
Impact 4.1-6 ² : Use of construction pulling/stringing set-up locations during the approximately 13-20 month construction period could result in temporary adverse impacts to visual quality. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.1-6: SCE shall not place equipment on the pulling/splicing sites any sooner than two weeks prior to the required use.	
Impact 4.1-8: The Proposed Project could substantially degrade the existing visual character or quality of the Proposed Project site and its surroundings from public views. <i>Significant</i> <i>unavoidable</i>	Class I	Mitigation Measure 4.1-8a: SCE will submit to the City of Thousand Oaks a landscaping plan and perimeter wall design that maximizes screening of the Presidential Substation using trees, shrubs, other landscaping, and appropriate wall design, as part of the grading permit application for the Project. Mitigation Measure 4.1-8a4.1-8b: Implement Mitigation Measure 4.1-2b and Mitigation Measure 4.1-3b. Mitigation Measure 4.1-8b: Implement Mitigation Measure 4.1-2a and 4.1-2b.	The proposed Presidential Substation and proposed subtransmission alignments would be against natural landscapes and demand viewer attention on Olsen Road, a City of Thousand Oaks designated Scenic Highway. Despite mitigation to reduce visual contrast between the scenic character of the existing landscape and the Proposed Project, significant impacts would be unavoidable.
Impact 4.1-9: The Proposed Project would create new sources of light or glare that could adversely affect views in the project area. <i>Less than</i> <i>significant with mitigation</i>	Class II	Mitigation Measure 4.1-9a: Reduce Night Lighting and Glare Impacts. SCE shall design and install all lighting at project facilities, including construction and storage yards and the staging area, such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. SCE shall submit a <i>Construction and Operation Lighting Mitigation Plan</i> , which includes a photometric analysis indicating that these objectives would be achieved under SCE's proposed lighting design, to the <u>City of Thousand Oaks and the</u> CPUC for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SCE shall not order any exterior Lighting Mitigation Plan is approved by the <u>City of Thousand Oaks and the</u> CPUC. The Plan shall include but is not limited to the following measures:	

¹ Impact and Mitigation Measure 4.1-5 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

² Impact and Mitigation Measure 4.1-6 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Aesthetics (cont.)			
Impact 4.1-9 (cont.)		• Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary, and to reduce glare.	
		• All lighting shall be of minimum necessary brightness consistent with worker safety.	
		 High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied. 	
		Mitigation Measure 4.1-9b: Implement Mitigation Measure 4.1-9a.	
		Mitigation Measure 4.1-9c: Only low profile shaded street lighting, if needed, shall be used to reduce down slope light spillover and night glare.	
		Mitigation Measure 4.1-9d: Implement Mitigation Measure 4.1-2b.	
Impact 4.1-10 ³ : Alternative Substation Site B could substantially degrade the existing visual character or quality of the project site and its surroundings from public views. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.1-10: Prior to the start of the substation construction, SCE shall consult with the City of Simi Valley to develop an appropriate landscaping plan and perimeter wall design. The preliminary landscaping plan shall include a mixture of groundcover, shrubs, and trees based on the City of Simi Valley guidelines and standards for landscape plantings. Landscaping at the proposed substation site shall be designed to filter views for the surrounding community and other potential sensitive receptors. Plants shall be installed and maintained outside the south, east and west perimeter walls.	
Agriculture and Forestry Resources			
Impact 6-1 ⁴	<u>Class II</u>	Mitigation Measure 6-1: SCE shall obtain agricultural conservation easements, as defined under Civil Code section 815 <i>et seq</i> , at a one to one (1:1) ratio for each acre of Farmland that is permanently converted by the Proposed Project. An agricultural conservation easement is a voluntary, recorded agreement between a landowner and a holder of the easement that preserves the land for agriculture. The easement places legally enforceable restrictions on the land. The exact terms of the easement are negotiated, but restricted activities shall include subdivision of that property, non-farm development, and other uses that are inconsistent with agricultural production. The mitigation lands must be of equal or better quality (according to the latest available FMMP data) and have an adequate water supply. In addition, the mitigation lands must be within the same county as the impact.	

³ Impact and Mitigation Measure 4.1-10 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

⁴ Impact and Mitigation Measure 6-1 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Air Quality			
Impact 4.3-1: Project construction activities would generate ozone precursor emissions that could contribute substantially to a violation of ozone air quality standards. <i>Significant unavoidable</i>	Class I	Mitigation Measure 4.3-1: For off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles, SCE shall <u>make a good</u> <u>faith effort to</u> ensure achievement of a Project-wide fleet-average 20 percent NO _x and 20 percent ROC reduction compared to the most recent CARB fleet average. A Construction Equipment NO _x and ROC Reduction Plan to achieve these reductions shall be submitted to CPUC for review and approval prior to commence until the plan has been approved. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, and/or other options as such become available. If SCE determines that the 20 percent NO _x Reduction Plan shall include documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to necessary amounts of equipment with late model engines, engine retrofits, after treatment products, etc.	Project construction activities would generate ozone precursor emissions that could contribute substantially to a violation of ozone air quality standards.
Impact 4.3-2: ⁵ Project construction activities would generate fugitive dust emissions of criteria pollutants that could contribute substantially to an existing or projected air quality violation. <i>Less than</i> <i>significant with mitigation</i>	<u>Class II</u>	 Mitigation Measure 4.3-2: SCE shall reduce construction-related fugitive dust emissions by implementing the following VCAPCD dust control measures. SCE shall require all contractors to comply with the following requirements: Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities. All soil and fill haul trucks shall be required to have covered loads. All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible. Graded and/or excavated inactive areas of the construction site shall be monitored by the mitigation monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust. 	

⁵ Impact 4.3-2 and Mitigation Measure 4.3-2 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Air Quality (cont.)			
Impact 4.3-2 (cont.)		 Signs shall be posted at the proposed Presidential Substation work site limiting traffic to 15 miles per hour or less. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the mitigation monitor in determining when winds are excessive. Adjacent public streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. Personnel involved in grading operations, including contractors and 	
		subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.	
Impact 4.3-3Impact 4.3-4: Construction activities would result in emissions of NOx that would be cumulatively considerable. <i>Significant unavoidable</i>	Class I	Mitigation Measure 4.3-34.3-4: Implement Mitigation Measures 4.3-1 (Construction Equipment NOx Reductions) and 4.3-2 (Fugitive Dust Mitigation Plan).	Project construction activities would generate ozone precursor emissions that could contribute substantially to a violation of ozone air quality standards.
Biological Resources			
Impact 4.4-1 ⁶ : Construction activities associated with the Proposed Project could result in adverse impacts to the following federal and/or State-Listed Endangered or Threatened plant species: Braunton's milk-vetch, Agoura Hills dudleya, Conejo dudleya, and Lyon's pentachaeta as well as other non listed special-status species. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.4-1: SCE and or its contractors shall develop and implement a Noxious Weed and Invasive Plant Control Plan consistent with standard BMPs (see for example: Department of Transportation, State of California (Storm Water Quality Handbook - Project Planning and Design Guide [Caltrans, 2010]; and Construction Site Best Management Practices Manual [Caltrans, 2003]). The Plan shall be reviewed and approved by the Ventura County Office of the Agricultural Commissioner and the CPUC. At a minimum, the Plan shall address any required cleaning of construction vehicles to minimize spread of noxious weeds and invasive plants.	
Impact 4.4-2: Construction activities associated with the Proposed Project could result in adverse impacts to the following special-status wildlife species, if present: western pond turtle, coast horned lizard, Swainson's hawk, American peregrine falcon, coastal California gnatcatcher, and San Diego desert woodrat. <i>Less than significant with mitigation</i>	Class II	Mitigation Measure 4.4-2a: Within areas that provide potentially suitable habitat, SCE and/or its contractors shall perform preconstruction surveys within 24 hours of initial ground disturbance to identify the potential presence of western pond turtle, coast horned lizard and San Diego desert woodrat within work areas. If any of these species are identified during surveys of the immediate project footprint, individuals shall be relocated from work areas by an individual who is authorized by CDFG to undertake species relocation. A suitable relocation area shall be identified and approved by CDFG prior to preconstruction surveys.	

⁶ Impact 4.4-1 and Mitigation Measure 4.4-1 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact			
Biological Resources (cont.)	Siological Resources (cont.)					
Impact 4.4-2 (cont.)		Mitigation Measure 4.4-2b: Where impacts to coastal sage scrub cannot be avoided (e.g. at the proposed Presidential Substation site <u>and portions of substransmission alignments</u>), SCE and/or its contractors shall contact CDFG and the USFWS to coordinate coastal scrub avoidance measures that have been incorporated into the project design, and determine if additional measures are needed to reduce impacts to coastal California gnatcatcher habitat. Avoidance measures may include limiting the seasonal timing of work outside the breeding so that active gnatcatcher nesting is not disrupted during construction, limiting project disturbances to the smallest possible area in or near areas with suitable habitat, and providing environmental training to construction workers. In addition, the following actions will be carried out:				
		 Coastal sage scrub shall be restored at a 1:1 ratio in areas where it is temporarily disturbed. <u>If permanent impacts are anticipated to coastal sage</u> <u>scrub, SCE shall establish new habitat at a ratio of at least 1:1 (one acre of</u> <u>created habitat for each acre lost) to achieve a no-net loss standard.</u> 				
		 A qualified ecologist shall prepare a restoration and mitigation plan in coordination with CDFG and USFWS to mitigate for temporarilytemporary impacts to coastal sage scrub habitat with the intention of restoring habitat for coastal California gnatcatcher. The plan shall include a full description of microhabitat conditions necessary for each affected target vegetation species, seed germination and planting requirements, a description of the supplemental irrigation system, if needed to support site restoration, restoration techniques for temporarily disturbed occurrences, assessments of potential transplant and enhancement sites, success and performance criteria, and monitoring requirements, as well as measures to ensure long-term sustainability. Restoration sites shall be monitored for a period of at least three years to track mitigation program. Plant survival and growth shall be recorded at the same time each year and reported to resource agencies on an annual basis using survival and percentage cover as a metric of success. Restored areas shall be considered mature when they achieve 50 percent coverage by native plant species. The mitigation plan shall apply to portions of the project alignment that support restored coastal sage scrub habitat (e.g. at the proposed subtransmission alignment). At a minimum, the mitigation plan shall provide: 				
		 The location of mitigation sites that are selected from suitable lands in the in the local project vicinity; A description of native vegetation to be planted or seeded and an estimation of the density and coverage of the final planted areas; Site preparation measures that will be employed to encourage vegetation establishment, including the need for supplemental irrigation, erosion control, or other measures as appropriate; 				

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Biological Resources (cont.)			
Impact 4.4-2 (cont.)		 Measures that would be employed to discourage site invasion by non- native species, for example, mowing, weeding, and/or herbicide application; The source of plantings or seeds that are used in support of site restoration, with a preference for local plant stock wherever possible; A schedule for maintaining and monitoring restored areas to include the number of scheduled site visits, actions that will be taken on each site visit, contingency measures to respond to site degradation, need for replanting, invasion by weeds, or erosion; The restoration effort shall be considered successful when plant cover reaches 50 percent, or is at least comparable to vegetation cover in disturbed areas, and plants are self-sustaining without supplemental water for a period of at least two years. Annual monitoring reports shall be prepared to document site progress and measures that were implemented during the prior year. Reports shall be 	
Impact 4.4-3 ⁷ : Construction activities may impact common or protected nesting migratory birds. Less than significant with mitigation	<u>Class II</u>	Submitted to CDFG and OSFWS for review and approval. Mitigation Measure 4.4-3: SCE and/or its contractors shall implement the following measures to avoid impacts on nesting raptors and other protected birds for construction activities that are scheduled during the breeding season (February 1 through August 31): No more than two weeks before construction within each new construction area, a qualified wildlife biologist shall conduct preconstruction surveys of all potential nesting habitat within 500 feet of construction sites. If active nests are not identified, no further action is necessary. If active nests are identified, a no-disturbance buffer shall be created around active raptor nests and nests of other special-status birds during the breeding season, or until it is determined that all young have fledged. Typical buffers are 300 to 500 feet for raptors and 150 to 250 feet for other nesting birds (e.g., waterfowl and songbirds), depending upon species. The size of these buffer zones and types of construction activities that are allowed in these areas could be further modified during construction in coordination with CDFG and shall be based on existing and anticipated levels of noise and disturbance.	
Impact 4.4-4: Operation of new transmission lines could impact raptors as a result of electrocution or collision. <i>Less than significant with mitigation</i>	Class II	 Mitigation Measure 4.4-4: SCE shall follow APLIC guidelines for avian protection on powerlines. SCE and/or its contractors shall use current guidelines to reduce bird mortality from interactions with powerlines. The APLIC (2005) and USFWS recommend the following: Provide 60-inch minimum horizontal separation between energized conductors or energized conductors and grounded hardware; 	

⁷ Impact 4.4-3 and Mitigation Measure 4.4-3 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Biological Resources (cont.)			
Impact 4.4-2 (cont.)		 Insulate hardware or conductors against simultaneous contact if adequate spacing is not possible, and; 	
		 Use pole designs that minimize impacts to birds, and; 	
		Shield wires to minimize the offects from bird collisions.	
Impact 4.4-5: Construction of the proposed subtransmission alignment could impact designated critical habitat for coastal California gnatcatcher. <i>Less than significant with mitigation</i>	Class II	Mitigation Measure 4.4-5: Implementation of Mitigation Measure 4.4-2a and 4.4-2.	
Impact 4.4-6: Construction activities could impact jurisdictional waters of the United States and waters of the State, including drainages and seasonal wetlands. <i>Less than significant with mitigation</i>	Class II	Mitigation Measure 4.4-6a: SCE and/or its contractors shall through project design, avoid <u>and minimize impacts to jurisdictional</u> waters of the U.S. and waters of the State to the maximum extent possible. This includes minimizing the footprint during construction of poles for the proposed subtransmission line and spanning drainages that occur within the alignment.	
		Mitigation Measure 4.4-6b: In the event of any project changes that involve ground disturbance outside of the boundary of the existing wetland delineation, a new wetland delineation shall be performed.	
		Mitigation Measure 4.4-6c6b : Where jurisdictional wetlands and other waters cannot be avoided, <u>o.g.</u> , <u>at the Proposed Presidential Substation site</u> , to offset temporary and permanent impacts that occur as a result of the project, restoration, enhancement or compensatory mitigation shall be provided through the following mechanisms:	
		 To compensate for wetland impacts from the Proposed Presidential Substation, wetland enhancement and/or restoration shall be performed at a suitable off-site drainage or stream that is suitable to CDFG, RWQCB, and the Corps. Wetland mitigation and/or enhancement shall be provided at a minimum 2:1 replacement ratio in one of several nearby unnamed intermittent drainages to offset wetland losses. 	
		 If temporary impacts are anticipated to wetlands, a Wetland Mitigation and Monitoring Plan shall be developed by a qualified biologist or wetland scientist in coordination with CDFG, RWQCB and the Corps that details mitigation and monitoring obligations for temporary impacts to wetlands and other waters as a result of construction activities. The Plan shall quantify the total acreage lost, monitoring and reporting requirements, and site specific plans to compensate for wetland losses resulting from the project at the ratios described above. The Plan shall be submitted to the appropriate regulatory agencies for approval. The Plan and documentation of such agency approval shall be submitted to the CPUC prior to construction. 	

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Biological Resources (cont.)			
Impact 4.4-8 ⁸ : Construction activities associated with Alternative 1 could result in adverse impacts to special-status plants species in portion of the alignment located north of the proposed Presidential Substation site. <i>Less than significant</i> with mitigation	<u>Class II</u>	 Mitigation Measure 4.4-8a: In portions of Alternative Subtransmission Alignment 1 that have not been surveyed for special-status plants, SCE and/or its contractors shall complete focused plant surveys following CDFG and USFWS special-status plant survey guidelines. Surveys shall document the location, extent, and size of rare plant populations in the study area for each project component, and shall be used to inform the planned avoidance of special-status plant populations whenever possible. Based on focused plant survey findings, to the extent feasible, the final project design shall minimize impacts on known special-status plant populations within and adjacent to the construction footprints, with complete avoidance of any federal or State-listed plant species. SCE and/or its contractors shall design facilities to avoid sensitive plant populations whenever possible. Exclusion fencing shall be installed and maintained during construction around sensitive plant populations with as large a buffer as possible to minimize the potential for direct and indirect impacts. Mitigation Measure 4.4- 8b: Where avoidance of non-listed plant species is not feasible, SCE and/or its contractors shall compensate for the loss through plant salvage and replanting, as follows: A qualified ecologist shall develop a Restoration and Mitigation Plan according to CDFG guidelines and in coordination with CDFG. At minimum, the plan shall include collection of complete plants or reproductive structures (as appropriate) from affected plants, a full description of microhabitat conditions necessary for each affected species, seed germination requirements, proposed restoration techniques for temporarily disturbed occurrences, an assessment of potential transplant and enhancement sites, a description of performance criteria, and a monitoring 	
Impact 4.4-9: ⁹ Construction activities associated with Alternative Subtransmission Alignment 2 could	<u>Class II</u>	Mitigation Measure 4.4-9: SCE and/or its contractors shall design Alternative Subtransmission Alignment 2 to avoid impacts to riparian habitat, with poles	
vireo, a federal and State listed Endangered species. Less than significant with mitigation		habitat occur, compensatory mitigation shall be required as described in Mitigation Measure 4.4-6b. Additionally, in the absence of a focused assessment to document the presence or absence of least Bell's vireo, this species shall be presumed present and construction activities near the identified drainage shall occur outside the February 1 through August 31	

⁸ Impact 4.4-8 and Mitigation Measure 4.4-8 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

⁹ Impact 4.4-9 and Mitigation Measure 4.4-9 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

	Impost		Cignificant Unavaidable
Impact	Class ^a	Mitigation Measure(s)	Residual Impact
Biological Resources (cont.)			
Impact 4.4-9 (cont.)		If SCE plans to locate facilities within 250 feet of riparian habitat at this location during the least Bell's vireo breeding season, a habitat assessment for least Bell's vireo shall be performed at this location and findings coordinated with the USFWS to determine the need for the full eight survey protocol. If least Bell's vireo are identified during surveys, construction activities at this location would occur outside the breeding season to avoid impacts to this species.	
Cultural Resources			
Impact 4.5-1: Project construction could cause an adverse change in the significance of a historical resource [inclusive of archaeological resources] which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic resources. <i>Less than significant with</i> <i>mitigation</i>	Class II	 Mitigation Measure 4.5-1: A qualified archaeologist shall be retained to serve as lead archaeologist and shall prepare and implement a Cultural Resources Treatment and Discovery Plan prior to issuance of a grading permit. The Cultural Resources Treatment and Discovery Plan shall address the implementation of protective measures (as detailed in APMs CUL-2 through CUL-5), archaeological monitoring, and procedures for discovery of cultural resources. The Cultural Resources Treatment and Discovery Plan shall provide detailed plans for data recovery for those components of eligible resource CA-VEN-744 that cannot be avoided during project implementation, and for the capping of those portions of site CA-VEN-744 that may be indirectly impacted. The plan shall also address the creation of Environmentally Sensitive Areas within sites CA-VEN-744 and CA-VEN-1571. The Cultural Resources Treatment and Discovery Plan shall also state that if significant portions of either site are encountered during project implementation outside of protected areas, Proposed Project redesign should be considered in order to avoid impacts to significant areas. If avoidance is infeasible, then data recovery shall be implemented. The Cultural Resources Treatment and Discovery Plan shall detail the duration and locations of archaeological and Native American monitoring during project implementation and shall provide for discretionary modifications to monitoring procedures by the lead archaeologist based on observations made by the monitor as construction progresses. The Cultural Resources Treatment and Discovery Plan shall also create measures for the accidental discovery of archaeological resources for the accidental discovery of archaeological resources to using project implementation. Avoidance shall be the preferred means of avoiding impacts to cultural Resources. The Cultural Resources for data recovery plan shall also create measures for the accidental discovery of archaeological resources during project implement	
Impact 4.5-3: ¹⁰ The project could adversely affect unidentified paleontological resources. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.5-3: Applicant Proposed Measures PAL-01 and PAL-02 shall be implemented for all paleontologically sensitive portions of the project area. The Paleontological Mitigation Plan, as described in Applicant Proposed Measure PAL-01, shall be based on prior paleontological evaluations, shall identify a plantal prior based on prior paleontological evaluations, shall be	

¹⁰ Impact 4.5-3 and Mitigation Measure 4.5-3 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Cultural Resources (cont.)			
Impact 4.5-3 (cont.)		address the locations of and procedures for paleontological resources monitoring, including the identification of specific paleontological monitoring locations; microscopic examination of samples where applicable; the evaluation, recovery, identification, and curation of fossils; and the preparation of a final mitigation report. All earth moving activities within those formations identified as sensitive within the Paleontological Mitigation Plan shall be monitored on a full-time basis, unless the project paleontologist determines that sediments are previously disturbed or there is no reason to continue monitoring in a particular area due to other depositional factors, which would make fossil preservation unlikely or deemed scientifically insignificant. In the event fossils are exposed during earth moving, construction activities shall be redirected to other work areas until the procedures outlined in the Paleontological Mitigation Plan have been implemented or the paleontologist determines work can resume in the vicinity of the find.	
Impact 4.5-4: Project construction could result in damage to previously unidentified human remains. <i>Less than significant with mitigation</i>	Class II	Mitigation Measure 4.5-4: If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work in the vicinity of the find, contact the Ventura County Coroner to evaluate the remains, and follow the procedures and protocols set forth in §15064.5 (e)(1) of the CEQA Guidelines. If the County coroner determines that the remains are Native American, SCE shall contact the NAHC, in accordance with Health and Safety Code §7050.5, subdivision (c), and PRC5097.98 (as amended by AB 2641). Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this soction (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	
Impact 4.5-5 ¹¹ : Construction of Alternative Subtransmission Alignment 1 could adversely impact a unique archaeological resource. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.5-5: The portion of Alternative Subtransmission Alignment 1 that has not been subject to archaeological survey shall be surveyed prior to any ground-disturbing activities. If significant cultural resources are identified, the procedures described in Mitigation Measure 4.5- 2b shall be implemented.	

¹¹ Impact 45-5 and Mitigation Measure 4.5-5 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Greenhouse Gas Emissions			
Impact 4.7-2: The Proposed Project could conflict with CARB's Climate Change Scoping Plan. <i>Less</i> <i>than significant with mitigation</i>	Class II	Mitigation Measure 4.7-2: SCE shall ensure that the circuit breakers installed at the proposed Presidential Substation have a guaranteed SF6 annual leak rate of no more than 0.5 percent by volume. SCE shall provide CPUC with documentation of compliance, such as specification sheets, prior to installation of the circuit breakers. In addition, SCE shall annually monitor the SF6- containing circuit breakers at the proposed Presidential Substation for the detection and repair of leaks. SCE shall annually report its Presidential Substation-related SF6 emissions to the CPUC until a regulation is approved by the State of California Office of Administrative Law that approves a regulation requiring annual reporting of SF6 emissions to the CARB.	
Hazards and Hazardous Materials			
Impact 4.8-1: Construction, operations, and maintenance activities would require the use of certain materials such as fuels, oils, solvents, and other chemical products that could pose a potential hazard to the public or the environment through routine transport and use or accidental release. <i>Less than significant with mitigation</i>	Class II	 Mitigation Measure 4.8-1a: SCE and/or its contractors shall implement BMPs including but not limited to the following: Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction; Avoid overtopping construction and maintenance equipment fuel gas tanks; Use tarps and adsorbent pads under vehicles when refueling to contain and capture any spilled fuel; During routine maintenance of construction and operations equipment, properly contain and remove grease and oils; and Properly dispose of discarded containers of fuels and other chemicals. Mitigation Measure 4.8-1b: SCE and/or its contractors shall prepare a Hazardous Substance Control and Emergency Response Plan and implement it during construction, operations, and maintenance to ensure compliance with all applicable federal, State, and local laws and guidelines regarding the handling of hazardous materials. The plan shall prescribe hazardous material handling procedures to reduce the potential for a spill during construction, or exposure of the workers or public to hazardous materials. The plan shall approval prior to the commencement of construction activities. Hazardous Materials are released or encountered during excavation activities. The plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. Hazardous Materials and Hazardous Waste Handling: A project operations-specific hazardous materials management and hazardous waste management program shall be developed prior to <u>construction operations</u> of proposed Presidential Substation project. The program shall outline proper hazardous materials to be used at the proposed Presidential Substation 	

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact		
Hazards and Hazardous Materials (cont.)	Hazards and Hazardous Materials (cont.)				
Impact 4.8-1 (cont.)		personnel shall be provided with project-specific training. This program shall be developed to ensure that all hazardous materials and wastes are handled in a safe and environmentally sound manner. Employees handling wastes would receive hazardous materials training and shall be trained in hazardous waste procedures, spill contingencies, waste minimization procedures and Treatment, Storage, and Disposal Facility training in accordance with OSHA Hazard Communication Standard.			
		• <i>Transport of Hazardous Materials:</i> Containers used to store hazardous materials shall be properly labeled and kept in good condition. Written procedures for the transport of hazardous materials used shall be established in accordance with U.S. Department of Transportation and Caltrans regulations. A qualified transporter shall be selected to comply with U.S. Department of Transportation and Caltrans regulations.			
		• Emergency Release Response Procedures: An Operations Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to Substation <u>construction</u> operational activities. It would prescribe hazardous materials handling procedures for reducing the potential for a spill and would include an emergency response program to ensure quick and safe cleanup of accidental spills. All hazardous materials spills or threatened release, including petroleum products such as gasoline, diesel, and hydraulic fluid, regardless of the quantity spilled, would be immediately reported to the applicable agencies if the spill enters a storm drain, if the spill migrates from the site, or if the spill causes injury to a person or threatens injury to public health. The plan shall identify and make all personnel aware of the local, State, and federal emergency response reporting guidelines.			
		Mitigation Measure 4.8-1c: SCE and/or its contractors shall prepare and implement a Health and Safety Plan to ensure the health and safety of construction workers and the public during construction, operations, and maintenance. The plan shall include information on the appropriate personal protective equipment to be used during construction, operations, and maintenance.			
		Mitigation Measure 4.8-1d: SCE and/or its contractors shall ensure that oil- absorbent material, tarps, and storage drums shall be used to contain and control any minor releases. Emergency spill supplies and equipment shall be kept at the project staging areas and adjacent to all areas of work, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Substance Control and Emergency Response Plan (see Mitigation Measure 4.8-1b), which shall be implemented during construction operations, and maintenance.			

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Hazards and Hazardous Materials (cont.)			
Impact 4.8-1 (cont.)		Mitigation Measure 4.8-1e: SCE shall prepare and submit a Hazardous Materials Business Plan for the proposed Presidential Substation project. The required documentation shall be submitted to the Ventura County Department of Environmental Health and SCE. The Hazardous Materials Business Plan would include hazardous materials and hazardous waste management procedures and emergency response procedures, including emergency spill cleanup supplies and equipment.	
Impact 4.8-2 ¹² : Project activities could release previously unidentified hazardous materials into the environment. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.8-2: SCE's Hazardous Substance Control and Emergency Response Plan (as required under Mitigation Measure 4.8-1b) shall include provisions that would be implemented if any subsurface hazardous materials are encountered during construction. Provisions outlined in the plan shall include immediately stopping work in the contaminated area and contacting appropriate resource agencies, including the CPUC designated monitor, upon discovery of subsurface hazardous materials. The plan shall include the phone numbers local and State agencies and primary, secondary, and final cleanup procedures. The Hazardous Substance Control and Emergency Response Construction Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.	
Impact 4.8-3 ¹³ : Project activities could release hazardous materials within the vicinity of an existing day care facility. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.8-3: Implement Mitigation Measures 4.8-1a through 4.8- 1e, and 4.8-2.	
Impact 4.8-4 ¹⁴ : The Proposed Project could result in a safety hazard for people working in the project area because a nearby private airstrip. <i>Less than</i> <i>significant with mitigation</i>	<u>Class II</u>	Mitigation Measure 4.8-4: SCE shall provide written notification to the Ventura County Sheriff Department and the land owner of the Tierra Rejada Valley landing strip stating when the new subtransmission line and poles would be erected. SCE shall also provide the Sheriff Department and the landing strip owner with recent aerial photos or topographic maps clearly showing the location of the new lines and poles. The photos or maps shall also indicate the heights of the poles and conductors. SCE shall provide documentation of compliance to the <u>CPUC.</u>	
Impact 4.8-5: Construction of the Proposed Project could interfere with an emergency response or evacuation plan. Less than significant with mitigation	Class II	Mitigation Measure 4.8-5: Implement Mitigation Measures 4.15-1b-and 4.13-2.	

¹² Impact 4.8-2 and Mitigation Measure 4.8-2 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

¹³ Impact 4.8-3 and Mitigation Measure 4.8-3 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

¹⁴ Impact 4.8-4 and Mitigation Measure 4.8-4 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Hazards and Hazardous Materials (cont.)			
Impact 4.8-6 ¹⁵ : Construction and maintenance- related activities could ignite dry vegetation and start a fire. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.8-6: SCE and/or its contractors shall have water tanks and/or water trucks sited/available at active project sites for fire protection. All construction and maintenance vehicles shall have fire suppression equipment. Construction personnel shall be required to park vehicles away from dry vegetation. Prior to construction, SCE and its contractors shall contact and coordinate with the California Department of Forestry (CalFire) and applicable local fire departments (i.e., Ventura County) to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks if water trucks are not used. SCE shall submit verification of its consultation with CalFire and the local fire departments to the <u>CPUC.</u>	
Hydrology and Water Quality			
Impact 4.9-1: Construction and maintenance activities associated with the Proposed Project could result in increased erosion and sedimentation and/or pollutant (e.g., fuels and lubricants) loading to surface waters, which could increase turbidity, suspended solids, settleable solids, or otherwise degrade water quality. <i>Less</i> <i>than significant with mitigation</i>	Class II	 Mitigation Measure 4.9-1: For all segments of new or improved access roads that would be within 300 feet of an existing surface water channel (i.e., one that has a distinct bed and banks, including irrigation ditches where no berm/levee is currently in place) and traverse a ground slope greater than two percent, the following protective measures shall be adhered to and/or installed:¹⁶ All access roads shall be out-sloped; In-board ditches may be used to control/convey water seepage from cut slopes. If used, in-board ditches shall be lined with rock rip-rap and (the slope shall not exceed 6 percent); Cross-drains (road surface drainage, e.g., waterbars, rolling dips, or channel drains) shall be installed at intervals based upon the finished road slope: road slope 5 percent or less, cross-drain spacing shall be 150 feet; road slope 6 to 15 percent, cross-drain spacing shall be 75 feet; and 21 to 25 percent, cross-drain spacing shall be 50 feet; Energy dissipation features (e.g., rock rip-rap, or a rock-filled container) shall be installed at all cross-drain outlets; and No new or improved road segments with finished slopes greater than 25 percent. 	

¹⁵ Impact 4.8-6 and Mitigation Measure 4.8-6 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

impact or mitigation. ¹⁶ The mitigation measures for roads are based on measures and recommendations contained in the Handbook for Forest and Ranch Roads – A Guide for Planning, Designing, Constructing, Reconstructing, Maintaining, and Closing Wildland Roads (Weaver and Hagans, 1994).

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact			
Hydrology and Water Quality (cont.)						
Impact 4.9-2: Dewatering during Project construction activities could release previously contaminated groundwater to surface water bodies and/or increase sediment loading to local surface water channels through overland discharge and subsequent erosion, both processes could degrade water quality in receiving surface waters. <i>Less than</i> <i>significant with mitigation</i>	Class II	 Mitigation Measure 4.9-2: Regarding dewatering activities and discharges (if necessary), the following measures shall be implemented as part of Proposed Project construction: If degraded soil or groundwater is encountered during excavation (e.g., there is an obvious sheen, odor, or unnatural color to the soil or groundwater), SCE and/or its contractor shall excavate, segregate, test, and dispose of degraded soil or groundwater in accordance with State hazardous waste disposal requirements. 				
		 All dewatering activities shall, where feasible, ultimately discharge to the land surface in the vicinity of the particular installation or construction site. The discharges shall be contained, such that the water is allowed to infiltrate back into the soil (and eventually to the groundwater table) and the potential for inducing erosion and subsequent sediment delivery to nearby surface waterways is eliminated. Further, the holding tank or structure shall be protected from the introduction of pollutants (e.g., oil or fuel contamination from nearby equipment). Concerning such activities, SCE shall apply and comply with the provisions of SWRCB Order 2003-0003-DWQ, including develop and submit to the LARWQCB a discharge monitoring plan. If discharging to a community sewer system is feasible or necessary, SCE shall discharge to a community sewer system that flows to a wastewater treatment plant. Prior to discharging, SCE shall inform the responsible organization or municipality and present them with a description of and plan for the anticipated discharge. SCE shall comply with any specific requirements that the responsible organization or municipality may have. If discharging to surface waters (including to storm drains) would be necessary, SCE shall obtain and comply with the provisions of the LARWQCB Dewatering General Permit. SCE shall perform a reasonable potential analysis using a representative sample(s) for the constituents listed in the LARWQCB Dewatering General Permit, including TDS and nitrate. Further, the sample(s) shall be compared to the screening criteria listed in the LARWQCB Dewatering General Permit and the Basin Plan, and it shall be demonstrated that the discharge would not exceed any of the applicable water quality criteria or objectives. If necessary, SCE shall develop and submit to the LARWQCB a treatment plan and design. 				
Impact 4.9-3: Installation of the proposed Presidential Substation would alter the local drainage pattern, potentially resulting in substantial on- or off-site erosion or sedimentation, and/or substantially increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. <i>Less than significant with</i> <i>mitigation</i>	Class II	Mitigation Measure 4.9-3: The following storm water quality control measures and BMPs shall be implemented at the proposed Presidential Substation site (see Appendix D for the related worksheet and calculations):				
		• SCE shall implement a Retention BMP(s) (as defined in the Ventura County TGM [2010]) with a design volume of approximately 0.010.006 acre-feet. The drainage area to this feature shall comprise at least 0.17 0.10 acres of the proposed impervious surface area. This BMP shall be selected,				

Impact	act Class ^a Mitigation Measure(s)		Significant Unavoidable Residual Impact
Hydrology and Water Quality (cont.)			
Impact 4.9-3 (cont.)		 designed, and implemented according to the guidance and requirements summarized in the Ventura County MS4 Permit and the Ventura County TGM (2010). Alternatively, SCE shall demonstrate that the proposed storm water infiltration swale, or modifications thereto, would meet these mitigation requirements. SCE shall implement a Treatment Control BMP(s) (as defined in the Ventura County TGM [2010]) with a design volume of approximately 0.05 acre-feet. The drainage area to this feature shall comprise at least the remaining 3.83 5.3 acres of the proposed Presidential substation site (i.e., the residual drainage area not captured by the Retention BMP(s)). This BMP shall be selected, designed, and implemented according to the guidance and requirements summarized in the Ventura County MS4 Permit and the Ventura County TGM (2010). Alternatively, SCE shall demonstrate that the proposed storm water infiltration swale, or modifications thereto, would meet these mitigation requirements. 	
Noise			
Impact 4.11-1 ¹⁷ : Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria. <i>Significant</i> <i>unavoidable</i>	<u>Class I</u>	 Mitigation Measure 4.11-1a: SCE and/or its contractors shall develop a Construction Noise Reduction Plan. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The Plan shall include, but not be limited to, the following measures for daytime construction activities: Publish and distribute to the potentially affected community within 300 feet, a "Hot Line" telephone number or pager number, which shall be attended during active construction working hours, for use by the public to register complaints. All complaints shall be logged noting date, time, complainants' name, nature of complaint, and any corrective action taken. All construction equipment shall have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations. Maximize physical separation, as far as practicable, between noise sources (construction equipment) and noise receptors. Separation may be achieved by providing enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the project sites and by locating stationary equipment to minimize noise impacts on the community. Utilize construction noise barriers such as paneled noise shields, barriers, or enclosures adjacent to or around noisy equipment associated with access road construction, pole installation and removal, and underground trenching for distribution line and fiber optic cable in the immediate vicinity (i.e., within 200 feet) of sensitive receptors. Noise control shields shall be made 	Daytime construction activities associated with at least one TSP installation and installation of the underground distribution line and fiber optic cable would likely exceed the Ventura County construction noise threshold criteria, and nearly all nighttime construction activities within 1,000 feet of Ventura County sensitive receptors would continue to exceed the Ventura County construction noise threshold criteria.

¹⁷ Impact 4.11-1 and Mitigation Measure 4.11-1a were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Noise (cont.)		· · · · · · · · · · · · · · · · · · ·	
Impact 4.9-11 (cont.)		 <u>featuring a solid panel and a weather-protected, sound-absorptive material</u> on the construction-activity side of the noise shield. Shields used during <u>linear construction activities shall be readily removable and moveable so</u> that they may be repositioned, as necessary, to provide noise abatement for construction activities located near residential receptors. Mitigation Measure 4.11-1b: The Construction Noise Reduction Plan required by Mitigation Measure 4.11-1a shall include a nighttime noise and nuisance reduction strategy in the event that nighttime construction activity is determined to be necessary within 1,000 feet of sensitive receptors. The strategy shall include a set of site-specific noise attenuation measures that apply state of the art noise reduction technology to ensure that nighttime construction noise levels and associated nuisances are reduced to the extent feasible. The attenuation measures may include, but not be limited to, the control strategies and methods for implementation that are listed below. If any of the following strategies are determined by SCE to not be feasible, an explanation as to why the specific strategy is not feasible shall be included in the Construction Noise Reduction Plan. Plan construction activities to minimize the amount of nighttime construction 	
		 Offer temporary relocation of residents within 200 feet of nighttime construction activities. 	
		 Temporary noise barriers, such as shields and blankets, shall be installed immediately adjacent to all nighttime stationary noise sources (e.g., auger rigs, bore rigs, generators, pumps, etc.). 	
		• Install temporary noise barriers that block the line of sight between nighttime activities and the closest residences within 1,000 feet.	
		The notification requirements identified in Mitigation Measure 4.11-1a shall be extended to include residences within 1,000 feet of pending nighttime construction activities.	
Impact 4.11-4 ¹⁸ : Construction activities could increase ambient noise levels in Thousand Oaks and Simi Valley. Less than Significant with Mitigation	<u>Class II</u>	Mitigation Measure 4.11-4: Implement Mitigation Measures 4.11-1a and 4.11- 1b.	

¹⁸ Impact 4.11-4 and Mitigation Measure 4.11-4 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact			
Transportation and Traffic	Transportation and Traffic					
Impact 4.15-1: Project construction would temporarily increase traffic volumes on roadways in the study area, and would potentially conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. <i>Less than</i> <i>significant with mitigation</i>	Class II	Mitigation Measure 4.15-1a: SCE shall obtain and comply with local road encroachment permits for public roads that are crossed by the proposed subtransmission alignment. SCE shall also coordinate <u>notify the owner of any</u> <u>private road east of Hwy 23 that would be crossed by the proposed</u> <u>subtransmission alignment regarding</u> short-term construction activities at <u>private</u> road crossings with the applicable private property owners. Copies of all encroachment permits for those specific construction activities that would <u>involve the crossing of a public road</u> , and evidence of private property <u>owner</u> <u>notification for those construction activities that would involve the crossing of a</u> <u>private road east of Hwy 23</u> coordination shall be provided to the CPUC prior to the commencement of <u>those specific</u> construction activities.				
		Mitigation Measure 4.15-1b: SCE shall prepare and implement a Traffic Management Plan subject to approval of the appropriate state agency and/or local government(s). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. The plan shall:				
		 Include a discussion of work hours, haul routes, work area delineation, traffic control and flagging; 				
		Identify all access and parking restriction and signage requirements;				
		• Require workers to park personal vehicles at the approved staging area and take only necessary Project vehicles to the work sites;				
		• Lay out plans for notifications and a process for communication with affected residents and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which road/lanes and access point/driveways would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints; and				
		• Include plans to coordinate all construction activities with emergency service providers in the area prior to construction to ensure that construction activities and associated lane closures would not significantly affect emergency response vehicles. Emergency service providers shall be notified of the timing, location, and duration of construction activities. All roads shall remain passable to emergency service vehicles at all times. SCE shall submit verification of its consultation with emergency service providers to the CPUC. Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow.				
		 Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow. 				

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Transportation and Traffic (cont.)			
Impact 4.15-1 (cont.)		Limit construction-related truck traffic on State highways to off-peak traffic hours to the extent feasible.	
		Mitigation Measure 4.15-1c: The County and SCE shall insure that appropriate warning signs are posted alerting bicyclists to bike lane closures and instructing motorists to share the road with bicyclists. In addition, in order to remove potential roadway hazards to bicyclist in the construction areas the SEC shall ensure that all contract haul trucks are covered to prevent spillage of materials onto haul routes, and that the area adjacent to the Substation site shall be kept free of debris and dirt that may accumulate from entering and exiting trucks by conducting regular sweeping of the project area.	
		Mitigation Measure 4.15-1d: SCE shall coordinate with the appropriate local government departments in Thousand Oaks, Simi Valley, with county agencies such as the Ventura County Public Works Agency, with state agencies such as Caltrans, and with other utility districts and agencies as appropriate, regarding the timing of construction projects that would occur near the Proposed Project. The Ventura County Public Works Agency reviews environmental documents to ensure that all individual and cumulative adverse impacts to the Regional Road Network and County-maintained local roads have been adequately evaluated and mitigated to insignificant levels. SCE shall submit verification of its coordination of Mitigation Measures 4.15-1a and 4.15-1b, would ensure that the cumulative effect of simultaneous construction activities in overlapping areas would be minimized.	
Impact 4.15-3: Project construction would increase potential traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways. <i>Less than significant with mitigation</i>	Class II	Mitigation Measure 4.15-3a: Implement Mitigation Measure 4.15-1a, Mitigation Measure 4.15-1b, and Mitigation Measure 4.15-1c.Mitigation Measure 4.15-3b: Roads damaged by construction would be repaired to a structural condition equal to that which existed prior to construction activity. The Project Partners and the local jurisdiction shall enter into an agreement prior to construction that will detail the pre-construction conditions and the post-construction requirements of the rehabilitation program.	
Impact 4.15-4 ¹⁹ : The Proposed Project would not result in inadequate emergency access. Less than significant with mitigation	<u>Class II</u>	Mitigation Measure 4.15-4: Implement Mitigation Measure 4.15-1b.	

¹⁹ Impact 4.15-4 and Mitigation Measure 4.15-4 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Transportation and Traffic (cont.)			
Impact 4.15-5 ²⁰ : The Proposed Project would temporarily conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, and would temporarily decrease the performance or safety of such facilities. <i>Less than significant with mitigation</i> (Class II)	<u>Class II</u>	Mitigation Measure 4.15-5: Implement Mitigation Measure 4.15-1c.	

²⁰ Impact 4.15-5 and Mitigation Measure 4.15-5 were included in the Draft EIR but accidentally omitted in Table ES-3 – the addition in the Final EIR is a typographical correction and does not represent a new impact or mitigation.

ES-40 The second row of the second column of Table ES-4 has been amended as follows:

Alternative would have similar impacts as the Proposed Project. In addition, create a new significant aesthetics impact would be created associated with Esperance Road subtransmission alignment.

ES-40 The fourth row of the second column of **Table ES-4** has been amended as follows:

Alternative would install the subtransmission line under Olsen road, thereby eliminating the aesthetic impacts associated with the crossing. However, significant impacts would remain related to the proposed Presidential Substation site. Overall <u>impact</u> reduced but still significant unavoidable.

ES-40 The last row of **Table ES-4** has been removed:

System Alternative B	Alternative would eliminate the significant unavoidable impacts associated with the substation site and Olsen Read crossing. Overall, impacts would be reduced to less than significant.	Alternative would not require construction of a new substation or subtransmission lines, resulting in less than significant impacts on air quality.	Short term construction impacts would be less than significant. Long term noise impacts are expected to increase due to larger transformers in the existing substations but would bo mitigated to less than significant.
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Chapter 1. Introduction

1-1 Under the heading **1.1 Overview of Proposed Project**, the third sentence of the second paragraph has been amended as follows:

These three distribution substations (Thousand Oaks Substation, Potrero Substation, and Royal Substation) (ENA substations) provide electrical service to approximately 60,000 metered customers and <u>all three</u> are presently at or near their operating capacity.

1-1 Under the heading **1.1 Overview of Proposed Project**, the third of the second paragraph has been amended as follows:

The proposed subtransmission alignments would occur predominantly within 3.5 miles of existing right-of-way (ROW). The Proposed Project would be constructed and operated with two 66 kV source subtransmission lines and four 16 kV distribution getaways. The proposed Presidential Substation, an unstaffed and automated, 56 MVA, 66/16 kV low-profile distribution substation, would be constructed on a 4-acre5.4- acre site within a 5.4-acre ROW with 2.5 acres of disturbed area or acquired property in the City of Thousand Oaks, near the eastern boundary of the City of Simi Valley.

1-2 Under the heading **1.2 Project Objective**, the last sentence of the first paragraph has been amended as follows:

SCE identified the objectives for the Proposed Project in its PEA (SCE, 2008 and 2012a, b and c) as follows:

- **1-2** Under the heading **1.2 Project Objective**, the first bullet point has been corrected as follows:
 - Meet long term electrical demand requirements in the ENA beginning in fall of 2012 or winter of 2013 and extending beyond 2014 in order to meet the 10 year planning criterion electrical needs area (ENA) as defined in the proponents application, PEA, and supplemental information;
- **1-2** Under the heading **1.2 Project Objective**, the second to last bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, <u>PEA</u>, and <u>revised demand forecasts</u> (SCE 2008 & 2012a, b and c); and
- **1-3** Under the heading **1.3.2 Other Agencies**, the following sentence has been corrected to more accurately represent Other Agencies' potential roles and responsibilities:

In addition to the CPUC, State agencies such as the California Department of Transportation (Caltrans), California Department of Fish and Game (CDFG) and the Regional Water Quality Control Board (RWQCB) would be involved in reviewing and/or approving permitting the project.

1-8 Under **References-** *Introduction*, the following references have been updated or added as follows:

SCE, 2012a. Southern California Edison. Data Response ED-08, number 5, March 19, 2012.

SCE, 2012b. Southern California Edison. Data Response ED-09, July 17, 2012.

SCE, 2012c. Southern California Edison. Data Response ED-10, September 20, 2012.

Chapter 2. Project Description

- **2-3** Under the heading **2.4 SCE's Proposed Project**, the first bullet point has been amended as follows:
 - Construction of a new 66/16 kV distribution substation (proposed Presidential Substation) on an approximately 4-acre5.4-acre site;

2-6 *Table 2-1*, has been revised as follows:

Construction of a new 66/16 kV low-profile distribution substation (Proposed Presidential Substation) on an approximate 4-acre 5.4-acre site

- Install one 66 kV switchrack
- Install five 66 kV circuit breakers and disconnect switches
- Install two 28 megavolt_ampere (MVA), 66/16 kV transformers
- Install two 16 kV, 4.8 megavolt-ampere reactive (MVAR) capacitor banks
- Install one 16 kV low-profile switchrack
- Install one TSP and one TSP riser subtransmission poles
- Install one vault outside northwest corner of proposed Presidential Substation perimeter wall
- Install four underground16 kV distribution getaways
- Install lighting
- Construct one Mechanical and Electrical Equipment Room (MEER)
- Construct perimeter wall and gategates
- Construct proposed Presidential Substation access driveway from Olsen Road
- Construct acceleration and deceleration lanes on Olsen Road
- Install site drainage
- Upgrade subtransmission (66 kV) relays at Royal and Moorpark Substations

Remove existing poles and construct new subtransmission poles and underground distribution facilities; install 66kV subtransmission conductor to proposed Presidential Substation

- Remove approximately 89 existing wooden 16 kV distribution poles and four 66 kV subtransmission poles
- Install approximately 66 steel subtransmission poles with polymer insulators within existing road ROW (25 TSPs, of which two are described in the substation section above, and 41 light weight steel (LWS) poles)
- Install 66 kV conductor (i.e., 2000 thousand circular mill [kcmil^a] copper) in new underground facilities beneath Hwy23.
- Install 66 kV conductor (i.e., 954 Stranded Aluminum (SAC) and 954 Aluminum Core Steel Reinforced (ACSR) on new subtransmission poles from subtransmission supply lines to the proposed Presidential Substation (except for the Hwy 23 crossing)
 - Double-circuit 66 kV subtransmission line from proposed Presidential Substation west to the junction of Read Road and Sunset Valley Road. (1.5 miles), within existing and/or upgraded ROW (including under Hwy 23)
 - Single-circuit 66 kV subtransmission line from junction of Read Road and Sunset Valley Road west adjacent to Read Road to the Moorpark-Thousand Oaks No. 2 (0.8 mile), within existing road ROW
 - Single-circuit 66 kV subtransmission line from junction of Read Road and Sunset Valley Road north adjacent to Sunset Valley Road to the Moorpark-Royal No. 2 (1.0 mile), within existing <u>road</u> ROW
- Construct new access roads or improve existing roads for construction and maintenance of subtransmission facilities <u>within existing and/or new ROW</u>.

2-7 Under the heading **2.5.1.1 Proposed Presidential Substation**, the first paragraph has been amended as follows:

The proposed Presidential Substation, an unstaffed and automated, 56 MVA, 66/16 kV low-profile distribution substation, would be constructed on a 4-acre 5.4-acre site in the City of Thousand Oaks <u>and</u> near the <u>eastern-western</u> boundary <u>withof</u> the City of Simi Valley (Figure 2-1). The proposed Presidential Substation would include, among other facilities, an asphalt concrete access road, perimeter wall, interior fences and <u>gategates</u>.
2-10 Under the heading **One 66 kV Switchrack**, the following sentence has been revised as follows:

The operating and transfer buses would each be approximately 120 feet long and consist of one two 1,590 kcmil ACSR conductors per phase.

2-10 Under the heading **66 kV Circuit Breakers and Disconnect Switches**, the following sentence has been revised as follows:

The bus-tie position would be equipped with a circuit breaker and <u>onetwo</u> groupoperated disconnect <u>switchswitches</u>.

2-11 Under the heading **One Mechanical and Electrical Equipment Room (MEER)**, the following sentence has been revised to reflect the correct dimensions:

The MEER dimensions would be approximately 36 feet long, 2015 feet wide and 12 feet high.

2-13 Regarding **Table 2-2** Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "From the proposed Presidential Substation west along Olsen Road a crossing onto the private driveway..." has been revised as follows:

13 vaults and 1314 pull boxes and 1 handhole

- **2-13** Regarding **Table 2-2** Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "Under Moorpark Road near the intersection of Read Road and Moorpark Road ..." has been revised as follows:
 - θ <u>2 vaults</u> <u>3 pull boxes</u> <u>2 pads and</u> 5 handholes
- **2-13** Regarding **Table 2-2** Overview of Duct Bank Construction, the approximate number of vaults and pull boxes required for the following alignment: "Under Tierra Rejada Road near the intersection of Sunset Valley Road and Tierra Rejada Road ..." has been revised as follows:
 - θ <u>3 vaults</u> <u>4 pull boxes</u> <u>1 pad and</u> <u>2 handholes</u>

2-14 Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities (continued from page 2-11), it should be clarified that additional structures would be installed for the section of the duct bank at the intersection of Moorpark Road and Read Road. The section has been revised as follows:

A section of duct bank would be installed at<u>in and adjacent to</u> the intersection of Moorpark Road and Read Road to underground the existing 16 kV distribution line in order to create additional space for the new 66 kV subtransmission line. <u>This</u> <u>installation of the duct bank would require approximately 2 new vaults, 3 pull</u> <u>boxes, 2 pads, and 5 handholes.</u>

2-14 Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities (continued from page 2-11), it should be clarified that additional structures would be installed for the section of the duct bank at the intersection of Tierra Rejada Road and Sunset Valley Road. The section has been revised as follows:

A section of duct bank would also be installed at<u>in and adjacent to</u> the intersection of Tierra Rejada Road and Sunset Valley Road to underground the existing 16 kV distribution line in order to create additional space for the new 66 kV subtransmission line. <u>This installation of the duct bank would require approximately 3 new vaults</u>, <u>4 pull boxes</u>, <u>1 pad</u>, and <u>2 handholes</u>.

2-14 Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities, the approximate length of the duct bank has been revised as follows:

From the west end of the vault, an underground duct bank containing four 5-inch diameter conduits would be constructed approximately <u>12,5009,400</u> feet long, as measured from the vault outside of Presidential Substation west across Hwy 23 to Sunset Valley Road.

2-14 Under the heading Four 16 kV Distribution Getaways and Other Distribution Facilities, the fourth paragraph has been revised as follows:

It is estimated that approximately 13 new vaults with associated vent pipes would be installed along this route along with approximately <u>1314</u> new pull boxes and one <u>new handhole</u>.

2-14 Under the heading **Lighting**, the following sentence has been revised to reflect the accurate number of incandescent lamps:

Typical lighting at SCE's distribution substations consists of approximately fifteen thirty 120 volt incandescent lamps rated at 120 watts.

2-16 Under the heading **Substation Drainage**, the following sentence has been revised:

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The existing CSP is located within the proposed <u>4-acre5.4-acre</u> Presidential Substation site and directs flow in a northwesterly direction under Olsen Road.

2-19 Under the heading **2.5.2.2** *Poles*, the following sentence has been revised:

New poles would be installed within the existing <u>road</u> ROW but some areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross arms.

- **2-19** Under the heading Light Weight Steel Poles, the first bullet point has been corrected as follows:
 - From the intersection with Moorpark Road along Read Road to the junction with Sunset Valley Road, approximately 22 wood 16 kV distribution poles (approximately 6529 to 75 feet ags) would be replaced with approximately 1816 new subtransmission LWS poles (61 to 75 feet ags), and two LWS poles with risers (61 to 75 feet ags).
- **2-20** The footnote on Figure 2-8 has been revised as follows:

Hi-Lo Switch Tubular Steel Pole and Hi-Lo Tubular Steel Pole are types of deadend poles that would be used for the Proposed Project. For clarification, while these specific pole names are not called out in the text of the Project Description, they are included in the overall pole count for the project.

- **2-27** Under the heading Light Weight Steel Poles, the second bullet point has been corrected as follows:
 - From Tierra Rejada Road along Sunset Valley Road to the junction with Read Road, approximately 22 wooden 16 kV distribution poles (approximately 35 feet ags.) would be replaced with approximately 2018 new subtransmission LWS poles (approximately 61-6575 feet ags) and two LWS poles with risers (61 to 75 feet ags).
- **2-27** Under the heading Light Weight Steel Poles, the third bullet point has been corrected as follows:
 - Along Tierra Rejada Road, near the junction of Sunset Valley Road, approximately threefour existing wood subtransmission poles and one guy stub would be replaced with threetwo LWS poles (approximately 61-6575 feet ags) and one LWS pole with risers (61 to 75 feet ags).
- **2-27** Under the heading **Tubular Steel Poles**, the second paragraph has been revised as follows:

Locations of new TSPs include:

• From the junction of Sunset Valley Road and Read Road to the proposed Presidential Substation, approximately <u>3742</u> existing wooden 16 kV

distribution poles (29 to 75 feet ags) would be replaced with <u>1415</u> TSPs (70–100 feet ags), and <u>twothree</u> TSP risers to accommodate the underground subtransmission crossing of Hwy 23. The TSP riser to the west of Hwy 23 would be approximately 80 feet tall, and the TSP riser to the east of Hwy 23 would be approximately 85 feet tall.

- Four existing 66 kV TSPs and one wood 16 kV distribution pole near the intersection of Read Road and Moorpark Road would be replaced with <u>fivefour</u> new subtransmission TSPs.
- <u>TwoFour</u> subtransmission wood poles and one 16 kV distribution wood pole near the intersection of Tierra Rejada Road and Sunset Valley Road would be replaced with twoone-subtransmission TSPs-(60-100 feet ags).
- One new TSP riser and one new TSP would be installed within the proposed Presidential Substation perimeter.

2-29 Under the heading **2.6 Rights-of-Way Requirements**, the first paragraph has been corrected as follows:

The portion of the property to be <u>developeddisturbed</u> would be approximately <u>4 acres</u>2.5 acres.

2-29 Under the heading **2.7.2 Worker Environmental Awareness Training**, the text has been corrected as follows:

A list of phone numbers of SCE personnel associated with the Proposed Project (archeologist, biologist, environmental compliance coordinator, <u>Qualified SWPPP</u> <u>Practitioner (QSP)</u>, and regional spill response coordinator).

2-31 Under the heading **2.8.1 Staging Areas**, the last sentence in the first paragraph has been amended as follows:

During construction, <u>most</u> workers would <u>typically</u> park their personal vehicles at the SCE Thousand Oaks Service Center, SCE Moorpark Substation, SCE Northern Transmission Office/Pardee Substation in Santa Clarita, <u>staging areas</u>, <u>construction</u> <u>sites</u>, <u>and/</u>or at a marshalling yard and carpool to the jobsite daily in company vehicles.

2-31 Under the heading **2.8.1 Staging Areas**, the second to last sentence has been clarified as follows:

The yard would be surfaced with crushed rock would be managed with the appropriate erosion control Best Management Practices (BMPs), which may include crushed rock if the existing surface is not compatible with storage and equipment requirements.

2-31 Under the heading 2.8.2 Access Roads, the first paragraph has been revised as follows:

Construction vehicles and equipment would use a combination of <u>new and</u> existing paved and unpaved public and private roads. <u>Widening existing access roads or the construction of new ones may require the construction of Hilfiker retaining walls</u> <u>due to the steep slope of the road ROW, particularly east of Hwy 23. Additionally, any grading activities would have extensive impacts to the slope and may require additional retaining walls to provide adequate stability.</u>

2-32 Under the heading **2.8.2.2 Subtransmission Lines, Relocation of Existing Distribution** Lines and Telecommunication Installation, the first sentence has been revised as followed:

The subtransmission line construction vehicles and equipment would use the existing paved asphalt roads identified below. No changes to these existing roads would be required.

2-32 Under the heading **2.8.2.2** Subtransmission Lines, Relocation of Existing Distribution Lines and Telecommunication Installation, the following has been revised:

Grading of <u>the</u> access road for this portion would result in approximately 2,300 cubic yards of cut and 500 cubic yards of fill <u>and may require the construction of</u> <u>Hilfiker retaining walls due to the steep slope of the road ROW, particularly east of</u> <u>Hwy 23. Additionally, any grading activities would have extensive impacts to the</u> <u>slope and may require additional retaining walls to provide adequate stability</u>. The excess cut soil could be used as a fill for the proposed Presidential Substation site.

2-33 *Figure 2-10* has been replaced with an updated version provided by SCE on November 15, 2011 in their comment letter, as shown on the following page.

2-34 Under the heading 2.8.3.1 Site Preparation and Grading, the following has been revised:

The proposed, approximately <u>4-acre5.4-acre</u> Presidential Substation site would need to be prepared for construction and installation of substation equipment and other ancillary facilities. Preparation would include survey, vegetation removal, fill, and grading. A contractor office trailer and equipment trailer would be placed within the proposed Presidential Substation construction area for the duration of construction. Initial site preparation and grading would occur during the dry season; consequently no dewatering activities are anticipated.

2-34 Under the heading **2.8.3.1 Site Preparation and Grading**, the following sentences in the second paragraph have been revised as follows:

Approximately 5,4404,000 truckloads of fill would be required to bring the site up to grade. Filling operations would be completed within the first three months of construction delivering approximately 6045 truckloads per day if operating seven days per week.



- Presidential Substation . 207584.02 Figure 2-10 Access Roads **2-34** Under the heading **2.8.3.1 Site Preparation and Grading**, the following sentences in the third paragraph have been revised as follows:

The area to be enclosed by the perimeter wall would be graded to a slope that varies between 1 and 2-3 percent and compacted to 90-95 percent of the maximum dry density.

2-39 Under the heading Tubular Steel Poles, the first sentence has been clarified as follows:

At each proposed TSP location, an approximate 10 foot radial area would be cleared, <u>as needed</u>, using the same methods described for LWS pole installation.

2-45 Under the heading **2.8.4.6 16 kV Distribution and Telecommunications Line Underground Installation**, the first paragraph has been revised as follows:

The installation of a distribution duct bank would <u>require</u> digging an approximately 52 inches deep by 24 inches wide trench for approximately 12,500 feet along portions of the 66 kV subtransmission alignment where TSPs would be constructed. <u>The 12,500 feet includes the trench length from the vault outside of Presidential</u> Substation west across Hwy 23 to Sunset Valley Road and also the duct bank work at both the intersections at Moorpark Road and Read Road, and at Tierra Rejada Road and Sunset Valley Road. The amount of soil to be removed would be approximately 5,000 cubic yards. Additional excavation would be required to install approximately 13<u>17 new</u> vaults, <u>1320</u> pull boxes, <u>11 pads</u>, and 8 handholes.

2-47 Under the heading **2.8.4.7 Removal of Existing Poles**, the first sentence has been revised as follows:

When the existing 16 kV distribution circuits, subtransmission circuits and telecommunications lines are transferred to new poles, where applicable (e.g. portions of the route involving LWS poles), or placed underground, approximately 89 wood 16 kV distribution poles and five wood subtransmission poles located within existing <u>road</u> ROW would be removed, including below ground portions.

2-49 Under the heading **2.8.5.1 Storm Water Pollution Prevention Plan**, the Construction General Permit has been amended and the text has been amended to reflect the new permit number:

Therefore, a Construction General Permit (Order Number 2009-009-DWQ 2010-0014-DWQ) from the Los Angeles Regional Water Quality Control Board (LARWQCB) would be required.

2-51 *Regarding Conductor Installation activity in Table 2-7, the quantity for Drum Straw Line Puller has been added:*

1-Drum Straw Line Puller

2-52 *Regarding Fiber Optic Installation in Table 2-7, the number of work days has been revised as follows:*

<u>1014</u>

2-54 *The Estimated Schedule column has been updated in* **Table 2-8**:

Estimated Schedule
January 2012 To be determined
February 2012-March 2013 2 to 3 months after construction begins
February 2012 – January 2013 2 to 13 months after construction begins
February 2012-March 2013 2 to 15 months after construction begins
February 2012 - September 2012-2 to 9 months after construction begins
April 2013-16 months after construction begins
Occurs throughout construction, to be completed-by-April 2012 approximately 16 months after construction begins

2-54 Under the heading **2.9 Project Operation and Maintenance**, the follow sentence has been added before the last sentence:

The proposed Presidential Substation would have a portable sanitation facility during operation for those accessing the site for routine maintenance and inspections.

2-56 *The following has been added to the bottom of Table 2-9:*

NOTES:

- ^a This refers to the comparison of two construction designs:
 - 1) Single-circuit construction is designed with each circuit installed on individual poles adjacent to one another; increasing the spacing between circuits.
 - Double-circuit construction is designed to have both circuits on the same pole, thereby reducing the spacing between conductors.
- **2-57** The following has been corrected at to the bottom of **Table 2-10** Summary of Permits Requirements:

Construction Traffic Management Plan	<u>Caltrans</u>	Necessary for any lane closures or street detours that would impact the flow of traffic on SR-23 and SR-118
Transportation Permit	<u>Caltrans</u>	Transport of over-size or over-weight vehicles on State highways will require a Caltrans Transportation Permit.
Watercourse Permit	<u>VCWPD</u>	Construction or placement of any structure in, upon or across a watercourse.

2-57 *Grading permits (ministerial) has been added to* **Table 2-10** *Summary of Permits Requirements:*

Grading Permit (ministerial)

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Chapter 3. Alternatives and Cumulative Projects

3-3 Under the heading **3.2.1** Consistency with Project Objectives, the following reference has been added to the first sentence of the second paragraph:

The objectives of the Proposed Project are defined by SCE in its PEA and supplemental information (SCE, 2008 and 2012a, b, and c).

- **3-3** Under the heading **SCE's Proposed Project Objectives**, the first bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the <u>electrical needs area</u> (ENA) beginning in 2011 and extending beyond 2014 in order to meet 10year planning criterion; as defined in the proponents application, PEA, and supplemental information including revised ENA load projections;
- **3-3** Under the heading **Basic Project Objectives as defined by the CEQA Team**, the first bullet point has been amended as follows:
 - Meet long term electrical demand requirements in the ENA as defined in the proponents application, PEA, and supplemental information (SCE, 2008 and 2012a, b and c); and
- **3-4** Under the heading **Basic Project Objectives as defined by the CEQA Team**, the last sentence of the fourth paragraph as been revised as follows:

Reliability decreases the longer the distance the two 66 kV source lines are routed within the same ROWright of way (ROW).

3-9 The last row has been removed in **Table 3-2 Summary of Alternative Screening Analysis**:

System Alternative B— Upgrading existing substation sites using non- standard transformer sizes	Additional 66 kV subtransmission lines would not be required.	Meets most project objectives	Meets feasibility criteria	Meets environmental criteria, although may result in different types of impacts than
 Replaces existing transformers with larger transformers to increase the capacity of existing substations. 				the Proposed Project.
 Requires change to non-standard equipment 				

3-11 *Table 3-2 Summary of Alternative Screening Analysis*, regarding Alternative Substation Site D under Project Objectives Criteria the following has been added:

Meets most project objectives.

3-13 The following row has been added after Alternative Substation Site G in Table 3-2 Summary of Alternative Screening Analysis:

Alternative				
Substation Site	Subtransmission Alignment	Project Objectives Criteria	Feasibility Criteria	Environmental Criteria
System Alternative B – Upgrading existing substations using non- standard transformer sizes • Replaces existing transformers with larger transformers to increase the capacity of existing substations. • Requires change to non-standard equipment • Additional 16 kV distribution circuits needed	Some possible upgrades to existing 66kV subtransmission lines may be required.	Fails. While in theory this alternative would meet some of the project objectives, based on technical analysis data from SCE this alternative is not viable due to concerns of safety, operability, and system reliability. In addition, these upgraded substations would be non-standard designs that would present problems for emergency workers.	Fails to meet feasibility criteria.	<u>Meets</u> <u>environmental</u> <u>criteria.</u>

- **3-14** Under the heading **3.3.1** Alternatives Analyzed in the EIR, the last bullet point has been removed:
 - System Alternative B Upgrade existing substations by replacing existing transformers with larger units.
- **3-16** Under the heading **3.3.2** Alternatives Eliminated from EIR Consideration, the following bullet point have been revised:
 - Alternative Substation <u>SideSite</u> E and subtransmission alignment
 - <u>System Alternative A -</u> Increase capacity of existing substations using standard transformer sizes
 - System Alternative B Upgrade existing substations by replacing existing transformers with larger non-standard units.
- **3-16** Under the heading **3.4 Alternatives Evaluated in this EIR**, the first and second paragraphs have been amended as follows:

Alternatives analyzed in this EIR include one alternative substation site, <u>and</u> three alternative subtransmission alignments<u>.</u> and one system alternative. System

Alternative B and the <u>The</u> No Project Alternative <u>are is a</u> stand-alone <u>alternatives</u> <u>alternative</u> and the evaluation of environmental effects is comprehensive.

Any alternative involving construction of a new substation would also require construction of two 66 kV subtransmission lines to supply the substation. In order to comprehensively consider the environmental effects of the Alternative Subtransmission Alignments (1, 2, and 3) the effects of constructing a new substation need to be considered as well. Specifically, Alternative Subtransmission Alignments 1, 2, 3 and the proposed subtransmission alignment would all be capable of supplying a new substation at either the proposed Presidential Substation site or Alternative Substation Site B with minor modifications. This results in seven six different alternative combinations, plus System Alternative B, and athe No Project Alternative for a total of nineseven alternatives analyzed.

3-16 Under the heading **3.4 Alternatives Evaluated in this EIR**, the following bullet point has been removed:

System Alternative B

3-17 Under the heading **3.4.1** Alternative Subtransmission Alignment 1, the last sentence in the second paragraph has been amended as follows:

Both the<u>The</u> subtransmission, <u>telecommunication line</u>, and 16 kV distribution circuits would be constructed underground at the Hwy 23 crossing. <u>The</u> <u>subtransmission line would require new underground conduit and structures</u>. <u>The</u> <u>16 kV distribution circuits and telecommunication lines would be constructed in</u> <u>existing underground conduit and structures</u>.

3-17 Under the heading **3.4.1** Alternative Subtransmission Alignment 1, the third paragraph has been amended as follows:

For 1.8 miles, the alignment would cross generally overland requiring new ROW up to 25 feet wide <u>as well as additional land rights for access that may not follow the</u> <u>subtransmission line</u>. The alignment would terminate at the substation-site entering the substation from directly north. For the proposed substation site, the lines would enter from the north. It is anticipated for Alternative Substation Site B, the lines would enter from either the west or the south. A new telecommunication line and 16 kV distribution circuit would be installed on the new LWS poles. The 16 kV and telecommunication lines would be placed underground at the intersections of Moorpark Road and Read Road as well as Esperance Road and Tierra Rejada Road to make clearance for the new 66 kV line segment.

3-17 Under the heading **3.4.1** Alternative Subtransmission Alignment 1, the fourth paragraph has been amended as follows:

Construction methods and duration would be similar to those described for the Proposed Project. With the additional access roads and potential water crossings, the construction duration is anticipated to be longer than the Proposed Project.

3-17 Under the heading *Feasibility*, the following sentence has been revised:

Additional ROW easements would need to be negotiated with property owners to gain easements for the new ROWline and related access roads.

3-18 Under the heading Lessen Significant Environmental Impacts, the following sentence has been revised:

This alternative would operate construction equipment for a shorter similar period of time and result but would result in fewer truck haul trips since 9,40012,500-feet of duct bank would not be constructed.

3-18 Under the heading **3.4.2 Alternative Subtransmission Alignment 2**, the third paragraph has been amended as follows:

The second source line would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Madera Road and Tierra Rejada <u>Royal</u> <u>Avenue</u> in the City of Simi Valley, and follows Madera Road to the substation sites.

3-18 Under the heading **3.4.2** Alternative Subtransmission Alignment 2, the fourth paragraph has been amended as follows:

Due to the curvatures in Olsen and Madera Roads, the subtransmission structures along this alignment could require additional support mechanisms such as anchors and guy wires, which could be located on both sides of the roadway. Poles located inon a curve or corner along the alignment would require some form of guying to provide additional support. Guying typically consists of a guy wire attaching a pole to a buried anchor or a shorter guy pole to provide additional stability. The use of a guy wire requires adequate space for the wire to attach to the ground at a location that provides adequate stability. Guy poles are used in situations where support is needed across a roadway or where space is constrained. In addition to reducing the lateral space needed to provide a pole added stability, guy poles provide the clearance needed for the safe passage of vehicles and can be used to avoid removing vegetation. To minimize the number of guy wires crossing the road, the subtransmission alignment would be designed to cross the roadway at certain locations so that most, or ideally all, of the guying would be located on the same side of the roadway as the subtransmission line. While overhead facilities could be located on both sides of the roadway in a given alignment, it would not occur such that facilities would run parallel to one another and clutter the road ROW on both sides.

3-19 Under the heading **3.4.2** Alternative Subtransmission Alignment 2, the following sentence of the fifth paragraph has been amended as follows:

While conductor<u>Conductor</u> pulling and preparation of pull and tension sites would be similar to the Proposed Project.

3-19 Under the heading **3.4.2** Alternative Subtransmission Alignment 2, the following has been added following the fifth paragraph:

<u>A telecommunication line would be required for this alternative. The</u> telecommunication line would travel west from the Presidential Substation site under Hwy 23 and along Read Road. Modification of access roads east of Hwy 23 could also be necessary as would some potential tree removal and/or tree trimming.

3-19 Under the heading **3.4.2** Alternative Subtransmission Alignment 2, the following paragraph has been added after the fifth paragraph:

<u>A telecommunication line would be required for this alternative. The</u> telecommunication line would travel west from the Presidential Substation site under Hwy 23 and along Read Road. Modification of access roads east of Hwy 23 could also be necessary as would some potential tree removal and/or tree trimming.

3-19 Under the heading **Feasibility**, the following sentence has been added after the second sentence:

In addition, overhang easements could be required.

3-21 Under the heading **3.4.3** Alternative Subtransmission Alignment 3, the following paragraph is revised as follows:

Once the double-circuit subtransmission line reaches the east side of Hwy 23, the line would continue underground to the new substation, where it would enter the substation either underground or via a TSP Riser Pole located outside the substation.

3-21 Under the heading **3.4.3** Alternative Subtransmission Alignment 3, the following paragraph is revised as follows:

The construction of a Hilfiker retaining wall-and widening of access roads identified for pole removal and installation-would not be required under this alternative. <u>Under this alternative</u>, additional groundwork would be required compared to the Proposed Project. For the portion of the alignment that will be undergrounded (from the intersection of Read Road and Sunset Valley Road heading east), SCE would construct a large flat pad to accommodate construction vehicles, turnaround areas, crane pad areas for installing the vault, and access roads for construction and maintenance. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunication line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

- **3-21** Under the heading **Relocation of Existing 16 kV Distribution**, the first bullet point has been amended as follows:
 - Along Sunset Valley Road from Tierra Rejada Road south to the intersection with Read Road – and Along Read Road from approximately Moorpark Road east to the intersection with Sunset Valley Road. Existing wooden poles carrying 16 kV distribution lines would be removed. Following installation of new poles (predominantly LWS), the 16 kV distribution line would be installed on the new poles beneath the 66 kV subtransmission line. In addition, a telecommunication line would also be installed on the same poles. Existing wooden poles carrying 16 kV distribution lines would be removed.
- **3-22** Under the heading **Relocation of Existing 16 kV Distribution**, the third bullet point has been amended as follows:
 - From Hwy 23 east to the Proposed Substation. The existing wooden poles would remain in place and continue to support the 16 kV distribution line. A telecommunication line would also be installed in the duct bank as described for the Proposed Project. on the existing wood 16 kV distribution poles. It is anticipated that the new telecommunication cable would be installed on the existing wood distribution poles in the communication space.
- **3-23** Under the heading **3.4.4 Alternative Substation Site B**, the first sentence of the first paragraph has been revised as follows:

Alternative Substation Site B would construct a new 66/16 kV substation on an approximate 2.3-acre 5.29-acre parcel of land located on the north site of Madera Road in the City of Simi Valley.

3-23 Under the heading **3.4.4** Alternative Substation Site B, the second sentence of the second paragraph has been revised as follows:

The Parcel contains several abandoned concrete block buildings and structures, a garage, <u>paved</u> parking areas and formerly contained four underground fuel storage tanks.

3-23 Under the heading **3.4.4 Alternative Substation Site B**, the third paragraph has been revised as follows:

The development of the substation site would consist of the complete demolition of most all above ground and any below ground structures. The existing site would be

cleared of all buildings, <u>and most of the following:</u> hardscape, landscape, irrigation, perimeter fencing /block walls and foundations.

3-23 Under the heading **3.4.4 Alternative Substation Site B**, the second sentence of the fourth paragraph has been revised as follows:

It is anticipated that the remainder of the site would be graded as cut to create the required fill.

3-23 Under the heading **3.4.4** Alternative Substation Site B, the following has been added to the end of the fourth paragraph:

An approximately 16 foot high perimeter wall would be constructed at the top of the elevated grade.

3-23 Under the heading **3.4.4** Alternative Substation Site *B*, the second sentence of the fifth paragraph has been amended as follows:

<u>AllMost</u> existing impervious surfaces, such as asphalt pavement, roof structures, and sidewalks would be eliminated.

3-24 Under the heading **3.4.4 Alternative Substation Site B**, the sixth paragraph has been amended as follows:

While engineering and configuration of Alternative Substation B would be different than the Proposed Project Substation because the site is smaller, substation equipment heights would be the same <u>although due to the elevation of</u> the site, the heights of the subtransmission poles coming into the site could increase and additional distribution poles may be required for the existing 16 kV getaways <u>out of the substation</u>. Design of the perimeter wall and landscaping would be coordinated with the City of Simi Valley and would likely be similar to the Proposed Project, <u>although the perimeter wall would be taller</u>.

3-24 Under the heading **3.4.4 Alternative Substation Site B**, the last paragraph has been amended as follows:

The construction and alignment of the 16 kV distribution getaways would be similar to the Proposed Project, but may require construction of twoapproximately three distribution duct banks underneath Olsen Road.

3-24 Under the heading **Feasibility**, the second sentence has been amended as follows:

Acquisition of approximately 2.3 acres 5.29 acres of land for the substation site would have to be negotiated with property owners (currently the City of Simi Valley).

3-24 Under the heading Lessen Significant Environmental Impacts, the text in the first paragraph has amended as follows:

In addition, impacts on aesthetics resources would be reduced to a level of less than significant <u>compared to the Proposed Project</u>. Construction of a new substation at Alternative Substation Site B would eliminate the need for an overhead subtransmission line to cross Olsen Road under Alternative <u>Subtransmission</u> Alignments 1, 2, and the proposed subtransmission alignment this. This eliminates the significant unavoidable aesthetic impacts associated with the crossing. In additionThis alternative would include the construction of a 16 foot high retaining wall, however, because the site is already an industrial site, the significant unavoidable aesthetics impacts associated with development of the proposed Presidential Substation site would be eliminated.

3-24 Section 3.4.5 System Alternative B – Upgrade Existing Substations with Non-Standard Equipment has been removed:

3.4.5 System Alternative B – Upgrade Existing Substations with Non-Standard Equipment

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment could need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.⁺

Rationale for Full Analysis

Project Objectives

This alternative would meet most of the project objectives but the operational flexibility and reliability would be less than under the Proposed Project.

Replacement of the existing transformers at one of the substations would temporarily reduce the reliability of the system as existing transformers are taken off line for replacement. If the transformer change out is accomplished during the non-summer period, reliability issues could be minimized or eliminated.

Feasibility

This alternative would meet all regulatory and technical feasibility criteria. No additional land or ROW acquisitions would be required under this alternative.

Lessen Significant Environmental Impacts

System Alternative B would not require the construction of a new substation and associated subtransmission or 16 kV distribution lines. Impacts on air quality, noise and aesthetics would be less than significant.

Potential New Impacts Created

The equipment used at these three substations may not be consistent with standard SCE substations and therefore it may not be as efficient for SCE to replace or repair equipment from existing stocks. Consequently, the time necessary to replace broken equipment or acquire parts to repair, may take longer, resulting in potential impacts on utility service (i.e. brown/black outs).

Thousand Oaks Substation is located near residences. Increasing transformer sizes would increase noise associated with the operation of the substation. However, transformers could be built to mitigate noise to less than significant levels.

Larger transformers would increase the visual profile of the substations. Because these are already industrial sites, the impact of an increased profile would be less than significant.

3-26 The heading 3.4.6 No Project Alternative, has been renumbered as follows:

3.4.56 No Project Alternative

3-26 Under the heading **3.5** Alternatives Eliminated from Full EIR Evaluation, the text in the first paragraph has amended as follows:

As discussed in Section 3.1, alternatives were assessed for their ability to reasonably achieve the basic project objectives and reduce the significant environmental impacts of the Proposed Project. Also, their technical, legal, and regulatory feasibility were evaluated. Based on these screening criteria, the alternatives eliminated from EIR consideration are listed above in Section 3.3.2. The rationale for <u>elimination</u>eliminating each alternative is presented below.

3-27 Under the heading **Rationale for Elimination**, the text in has amended as follows:

Alternative Subtransmission Alignment 4 would be technically feasible and capable of meeting basic project objectives; <u>however, it would not reduce</u> <u>significant environmental impacts to a greater degree than Alternative</u> Subtransmission Alignment 3, which was carried forward for complete analysis.

Similar to the Proposed Project noise and air quality impacts would be significant unavoidable but to a greater degree. ConstructionIn order to underground the entire subtransmission alignment, construction emission levels (air quality impacts) and noise impacts would increase <u>compared to the Proposed Project</u> due to the increased trenching and duct bank construction required compared to the Proposed Project. <u>This alternative would result in significant, unavoidable noise and air</u> quality impacts. While the impact classification is the same as the Proposed Project (significant, unavoidable), the actual emissions and noise impacts would be greater.

Impacts on aesthetic resources would be reduced to a level of less than significant in the same manner as Alternative Subtransmission Alignment 3.

Undergrounding the subtransmission lines under this alternative would reduce the visibility of the Proposed Project along Sunset Valley Road and the segment extending west from the intersection of Read Road and Sunset Valley Road. However, while beneficial, the impact to aesthetic resources in these locations has been reduced to a less than significant level with implementation of Mitigation Measures 4.1-2a and b. The significant, unavoidable aesthetic resource impacts created by the subtransmission lines occur at Olsen Road, near the proposed Presidential Substation. Alternative Subtransmission Alignment 3 and Alternative Subtransmission Alignment 4 both reduce impacts to aesthetic resources to a less than significant level in this location. However, Alternative Subtransmission Alignment 4 would result in increased impacts to air quality and noise resources. Therefore Alternative Subtransmission Alignment 3 would be environmentally superior to Alternative Subtransmission Alignment 4 and was carried forward for analysis.

In addition, preliminary analysis of environmental impacts identified cultural resources <u>within</u> for the segment between the origination point with Moorpark-Thousand Oaks No. 2 and the intersection of Read Road and Sunset Valley Road. <u>Alternative Subtransmission Alignment 3 is above ground in this section and avoids impacts to these cultural resources, while Alternative Subtransmission Alignment 4 would create potentially significant impacts to cultural resources in this location.</u>

Alternative Subtransmission Alignment 4 was eliminated from consideration because impacts to air quality and noise resources would increase <u>compared to the</u> <u>Proposed Project</u> and a new potentially significant impact to cultural resources could also occur. In addition, the <u>significant</u> impacts on aesthetic resources would

not be reduced more than under Alternative Subtransmission Alignment 3 which also reduced noise and air quality impacts and was carried forward for analysis.

- **3-36** In Section 3.5.7 under the heading **Potrero Substation Upgrades**, the following has been added after the second bullet:
 - Upgrade the existing transformer breakers and leads (work internal at the substation); and
- **3-27** In Section 3.5.6 under the heading **Rationale for Elimination**, the text in has amended as follows:

This alternative does not meet the basic project objective of meeting long-term projected electrical load requirements in the ENA (SCE, 2012c). The alternative would add 16.8 MVA of additional capacity which is not sufficient to meet need beyond 2014 electrical needs of the ENA and would require significant changes to SCE electrical infrastructure beyond the ENA (SCE, 2012c). Consequently, this alternative would require construction of a new substation in the future.

3-37 The follow section has been added on page 3-37, following Section 3.5.7:

3.5.8 System Alternative B – Upgrade Existing Substations

Description

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers (transformer base rating at 55 degree Celsius (C) rise without cooling or other overload provisions) with larger ones. The larger transformers would not be consistent with a standard SCE transformer sizing.

Installing larger transformers could require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16 kV distribution circuits may be required at some locations or existing 16 kV distribution getaway equipment may need to be upgraded.

The approximate size of the new transformers would be in the 25 to 30 MVA range (transformer base rating) depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty.²¹

²¹ The ability of a piece of electrical equipment to withstand abnormally high electrical current generated as a result of a short circuit. Electrical currents in excess of the short circuit duty can damage equipment leading to wide spread electrical system failure.

Rationale for Elimination

As originally described in the Draft EIR (September 16, 2011), System Alternative B proposed upgrading the Royal, Thousand Oaks, and Potrero Substations by replacing the existing 16.8 MVA transformers with larger ones. There would not be enough physical space within any of the substations to accommodate the replacement of four 16.8 MVA transformers with four 30 MVA transformers. For this reason a System Alternative B involving installation of four 30 MVA transformers at each substation was deemed not technically feasible.

Additionally, it was conceptualized that System Alternative B could involve the replacement of four 16.8 MVA transformers with three larger 30 MVA transformers to increase capacity at each substation. System Alternative B would involve replacing the existing transformers with larger ones at the Potrero, Thousand Oaks, and Royal substations, including fill and foundation work, expansion of the existing layouts, changes to switchgear and buses, new distribution circuits, and modification of 66 kV subtransmission lines within the ENA. Based on additional understanding of the technical requirements of this alternative, this version of System Alternative B was also determined to be technically infeasible and incapable of achieving reliability and flexibility objectives. As described in the Draft EIR alternative, the approximate size of the new transformers would be in the 25 to 30 MVA range depending on the space available at the substations to accommodate the equipment and other constraints such as short circuit duty. Comments received from SCE on the 2011 Draft EIR resulted in a re-examination of the feasibility of System Alternative B. SCE commented that this alternative would reconfigure the existing substations and create numerous technical problems within the ENA (detailed in Section 3.4 Comments SCE-8 through SCE-16), SCE provided additional information concerning the existing transformers to demonstrate why this alternative was not feasible (see Appendix H in the Final EIR for additional information). SCE's comments and supporting information are summarized below.

- 1. <u>The larger transformers would not be consistent with a standard SCE</u> <u>transformer sizing and it was recognized that installing larger transformers</u> <u>could require the replacement of some existing 16 kV distribution equipment</u> <u>located inside and outside of the substation footprint.</u>
- <u>The non-standard design of the larger transformers proposed in the</u> alternative would create operational safety problems for SCE in training of staff. SCE has indicated that its practice of standard transformer design at substations provides for safe operations during emergency conditions.</u> Operationally this non-standard design would present maintenance problems for replacement and spare equipment as well as require longer lead times for replacement than standard SCE equipment.
- 3. <u>The proposed larger transformers would require the 16kV bank breakers</u> <u>short circuit duty to substantially increase, thereby requiring the replacement</u> <u>of the impacted breakers. SCE had additional concerns about procurement of</u>

this non-standard equipment and estimated an additional 6 to 12 months to configure the existing substations for this design, if procurement is even feasible.

4. <u>Finally, SCE stated that the alternative, as proposed, would not provide</u> <u>greater reliability or operational flexibility over the Proposed Project due to</u> <u>several factors, including the additional time to design and manufacture these</u> <u>non-standard transformers, a reduced ability to shift loads within the ENA</u> <u>with only three substations, and a much more complicated distribution circuit</u> <u>switching regime when compared to standard transformers and the proposed</u> <u>Presidential substation design.</u>

Additional detail demonstrating why this alternative is not feasible is included in Appendix H in the Final EIR. Based on the further consideration of System Alternative B in light of clarifying technical information provided by SCE, the CPUC has determined that the conversion to 25 to 30 MVA transformers (or other similar sized transformers) is not a technically feasible alternative capable of achieving reliability and flexibility objectives of the Proposed Project.

3-37 The following heading has been revised as follows:

3.5.83.5.9 Non-Wires Alternative – Demand Management Conservation

3-37 In Section 3.5.9 under the heading **Rationale for Elimination**, the reference in the second sentence has been clarified as follows:

Existing Demand Management Conservation programs run by SCE include rebates on energy-efficient appliances, incentives for customer-owned solar generation, a metering system that allows SCE customers with smart thermostats and appliances to automatically respond during critical peak pricing and reliability events, and more (SCE, 2011<u>b</u>).

3-37 The following heading has been revised as follows:

3.5.93.5.10 Non-Wires Alternative – Renewable or Conventional/ Distributed Generation Energy Resources

3-39 Under the heading **Rationale for Elimination**, the text has been amended as follows:

Implementation of this alternative would not alleviate substation capacity in the ENA as distributed generation electricity would still utilize the existing distribution system. A Distributed Generation Alternative would involve deployment of distributed generation in the form of many small projects within the ENA at a pace more aggressive than SCE anticipates, or is projected in the Clean Energy Jobs Plan, which identified year 2020 as the target date for developing 12,000 MW of distributed energy. <u>EvenHowever, even</u> if distributed generation energy supply sources in the ENA were built, substation capacity would continue to be a limiting factor requiring additional infrastructure.

- **3-46** Under **References- Alternatives and Cumulative Projects**, the following references have been updated or added as follows:
 - California Energy Commission, 2010. *Blythe Solar Power Project: Revised Staff* Assessment, www.energy.ca.gov/sitingcases/solar_millennium_blythe/ documents/index.html
 - California Energy Commission, 2007. Distributed Generation And Cogeneration Policy Roadmap For California. http://www.energy.ca.gov/2007publications/ CEC-500-2007-021/CEC-500-2007-021.PDF, accessed November 16, 2011.
 - California Energy Commission (CEC), 2003. Renewable Resources Development Report. Commission Report, November 2003. Publication number 500-03-080F.
 - <u>City of Thousand Oaks, 2009. City of Thousand Oaks Current Planning</u> Development Projects, Project Status Through April 30, 2009. May 2009
 - <u>SCE, 2008. Proponent's Environmental Assessment, Presidential Substation</u> <u>Project. Submitted to the Public Utilities Commission of the State of</u> <u>California, December 22, 2008.</u>
 - SCE, 2011a. Southern California Edison. Comments on the Draft EIR. November 15, 2011.
 - SCE, 2011<u>b</u>. Southern California Edison, Environment: Committed to Environmental Protection, www.sce.com/PowerandEnvironment/default.htm, accessed September 6, 2011.
 - SCE, 2012a. Southern California Edison. Data Response ED-08, number 5, March 19, 2012.
 - SCE, 2012b. Southern California Edison. Data Response ED-09, July 17, 2012.
 - SCE, 2012c. Southern California Edison. Data Response ED-10, September 20, 2012.

Chapter 4. Environmental Analysis

- **4-1** *The first bullet point in the center of the page has been revised as follows:*
 - Construction of a new 66/16 kV distribution substation on an approximately 4-acre<u>5.4-acre</u> site;

4-2 *The last bullet point in the center of the page, pertaining to alternatives has been revised as follows:*

System Alternative B

4-2 *The following text has been added under the* **Environmental Assessment Methodology** *heading:*

Scope of the Environmental Assessment

General Order No. 131-D Section XIV. Complaints and Preemption of Local Authority, Subsection B states that local jurisdictions are preempted from regulating electrical power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to CPUC jurisdiction. Public Utilities, such as SCE, are required to consult with local agencies regarding land use maters; however, local policies do not apply to such projects. This preemption would include the Proposed Project. As a result, any analysis on local policies and issues provided in this EIR is for informational purposes only. The Proposed Project is not required to comply with local policies and therefore a conflict with a local policy is not considered a significant impact.

4-2 *The last sentence of APM-PAL-01has been revised as follows:*

The Paleontological Monitoring Plan shall also include a final monitoring report provision for the preparation of a final report at the conclusion of the project. If fossils are identified, the final monitoring report shall contain an appropriate description of the fossils, treatment, and curation.

Section 4.1, Aesthetics

4.1-3 The first paragraph under the heading **Proposed Presidential Substation** in Section 4.1.1, the third sentence of the first paragraph has been modified to read:

Surrounded by avocado orchards, the Substation, which would have a 4- acres footprint, would be built on land which is presently disturb 2.5- acres of undeveloped land.

4.1-11 The second paragraph has been changed as follows:

However, a hillside between the end of the sidewalk and the Substation would be partially to fully screen views of the Substation.

4.1-11 Under the heading **Proposed Subtransmission Alignment along Read Road from Moorpark Road to Sunset Valley Road**, the second sentence of the first paragraph has been revised to read: For approximately 0.8 mile, the proposed subtransmission alignment would parallel Read Road along the south side, within existing SCE <u>franchiseroad</u> ROW.

4.1-13 Under the heading **Proposed Subtransmission Alignment along Sunset Valley Road from Tierra Rejada Road to Read Road**, the second sentence of the first paragraph has been revised as follows:

The proposed subtransmission alignment would travel south along the west side of Sunset Valley Road for approximately 1.0 mile to Read Road, within existing franchise road ROW.

4.1-13 The fifth sentence in the second paragraph under the heading **Proposed Subtransmission Alignment along Sunset Valley Road from Tierra Rejada Road to Read Road**, has been modified to read:

Motorists traveling east on Read Road between Moorpark Road and Sunset Valley roadRoad would have open and unobstructed views of this portion of the proposed subtransmission alignment across the Greenbelt, for approximately 0.8 mile.

4.1-13 Under the heading **Proposed Subtransmission Alignment along Sunset Valley Road from Tierra Rejada Road to Read Road**, the second sentence of the third paragraph has been revised as follows:

Motorists on Tierra Rejada Road would travel <u>under the parallel to the</u> tie-in point of the proposed subtransmission line with the Moorpark-Royal No. 2 66 kV subtransmission line, and would have open and unobstructed views of the proposed subtransmission alignment as the line travels south along Sunset Valley Road.

4.1-15 The second sentence of the first paragraph under the heading Alternative Subtransmission Alignment 1 has been changed as follows:

For approximately 1.5 miles the alternative subtransmission alignment would parallel Read Road, an Eligible County Scenic Highway along the south side within existing <u>franchiseroad</u> ROW.

4.1-17 The first sentence of the first paragraph under the heading Alternative Subtransmission Alignment 3 has been expanded to say:

Alternative Subtransmission Alignment 3 would be identical to the Proposed Project with respect to the segment on Read Road from Moorpark Road to Sunset Valley, and the segment along Sunset Valley from Tierra Rejada to Read Road<u>except that it would end with a tubular steel riser pole at the intersection of Sunset</u> Valley and Read Road, instead of a tubular steel pole.

4.1-18 The first sentence in the first paragraph under the heading Alternative Substation Site B has been changed to read:

Alternative Substation Site B is located on an approximate $\frac{2.3}{5.29}$ acre parcel of land on the north side of Madera Road in the City of Simi Valley.

4.1-21 Under the heading *Moorpark Road*, the following addition has been made to the second sentence of the first paragraph:

Traffic volumes are moderate, estimated at 16,500 vehicles per day <u>in the vicinity</u> <u>of the Proposed Project (north of Santa Rosa Road)</u> (Ventura County, 2010b).

4.1-30 The view exposure of viewers from the Ronald Reagan Presidential Library (the third cell of the second row) described in **Table 4.1-2** has been adjusted to read:

Foreground and Middleground/Background Distance

4.1-32 System Alternative B has been removed from the heading **City of Thousand Oaks** General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B) as follows:

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.1-33 System Alternative B has been removed from the heading City of Thousand Oaks Zoning Ordinance (Proposed Project and Alternative Subtransmission Alignments 1, 2, and 3; System Alternative B) as follows:

City of Thousand Oaks Zoning Ordinance (Proposed Project and Alternative Subtransmission Alignments 1, 2, and 3; System Alternative B)

4.1-35 *The following reference has been corrected:*

(City of Simi Valley, 1988).

4.1-36 The following corrections have been made to the number ranges in the fifth and sixth sentences of the second paragraph under the heading Visual Simulations:

Of note, the heights of the LWS pole structures in the simulations are in the middle of the range of possible pole height, and not the maximum potential height. For example, LWS pole range is $65 \ 61$ to 75 feet ags, whereas the poles in the simulation are 70 feet ags. The simulations do represent the maximum middle range of potential <u>TSP</u> height of TSPs: the TSP range is $70 \text{ to } 75 \ 60 \text{ to } 100$ feet ags, and the simulation poles are 75 feet ags (SCE, 2011).

4.1-46 Under the heading **Impact 4.1-2; HWY 23**, the second sentence as been revised as follows:

From this vantage point, the Proposed Project would replace an existing 16 kV distribution line and associated wooden poles with a single-circuit 66 kV

subtransmission line, composed of new light-weight-steel (LWS) poles ranging from 61 feet to 6575 feet with a 954 Aluminum Conductor Steel Reinforced (ACSR)Stranded Aluminum Conductor (SAC) and polymer insulators.

4.1-46 The second paragraph under the heading **Impact 4.1-2; HWY 23** has been modified to read:

This portion of the proposed subtransmission alignment would generally involve replacing an existing 16kV distribution line and associated wooden poles with a double-circuit 66 kV subtransmission line, composed of Tubular Steel Poles (TSPs) with a 954 <u>Stranded</u> Aluminum Conductor Steel Reinforced (ACSR)(SAC) and polymer insulators. The existing 16 kV distribution would be installed underground along or near portions of the 66 kV subtransmission alignment, and a telecommunication line would follow the same underground alignment as the 16 kV distribution line. The TSPs would consist of an all steel structure with a dulled galvanized finish. Installing the conductor underground would require the installation of an approximately 80 feet<u>60</u> to 85 foot tall TSP riser pole near the end of Read Road, just west of Hwy 23, as well as a approximately <u>60</u> to 85-foot tall TSP riser pole on the east side of Hwy 23.

4.1-47 The third paragraph under the heading **Impact 4.1-2; HWY 23** has been changed as follows:

Implementation of Mitigation Measure 4.1-2a, requires that TSPs and LWS poles be made of self-weatherizing steel, which would oxidize to a natural-looking rust color within about one year. treated with a surface coating of appropriate colors, finishes and textures. Rust-colored Treated poles would resemble the existing wooden poles and would better blend with the background of trees and hillside, greatly reducing the appearance of visual change in the viewshed. Additionally, implementation of Mitigation Measure 4.1-2b requires the use of non-specular and non-reflexive materials for insulators and conductors. Implementation of Mitigation Measure 4.1-2c would minimize the presence of the retaining wall in the scenic hillside. Implementation of these measures would result in a low to moderate visual change to the project area. Although the retaining wall would continue to contrast with the scenic backdrop, it would not dominate the landscape or demand attention, particularly as viewers would be exposed to it for a short distance and given the presence of other structures in the viewshed (i.e., highway signs, the highway median barrier, satellites and antenna). Visual impacts to Hwy 23 would be less than significant with mitigation.

4.1-47 *Mitigation Measure 4.1-2a* has been altered to read:

Mitigation Measure 4.1-2a: For all <u>pole</u> structures that are visible from viewsheds where visual impacts are significant (i.e., Highway 23, Read Road, and-Underwood Family Farms, and Olsen Road), SCE shall install tubular steel poles or light-

weight steel poles made of self-weatherizing steel, which would oxidize to a natural-looking rust color within approximately one year. SCE shall apply surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape. For structures that are visible from one or more sensitive viewing locations, the darker colors shall be selected, because darker colors tend to blend into landscape more effectively than lighter colors, which may contrast and produce glare. At locations where a tubular steel pole or light-weight steel pole would be silhouetted against the skyline, nonreflective, light-gray colors shall be selected to blend with the sky. SCE shall develop a *Structure Surface Treatment Plan* for the tubular steel poles, light-weight steel poles, and any other visible structures in consultation with a visual specialist designated by the CPUC, as appropriate, to ensure that the objectives of this measure are achieved. SCE shall submit the Structure Surface Treatment Plan to the CPUC for review and approval at least 90 days prior to the start of construction.

4.1-47 Mitigation Measure 4.1-2c has been added after Mitigation Measure 4.1-2b as follows:

Mitigation Measure 4.1-2c: Prior to the start of construction of the retaining wall and reinforced geogrids visible from Highway 23, SCE will submit to the City of Thousand Oaks a landscaping plan and wall design, as part of the grading permit application for the Proposed Project.

4.1-49 The second paragraph under the heading **Read Road** has been revised as follows:

As seen from the simulation, to motorists along Read Road the Proposed Project would appear against a backdrop of trees and sky, as motorists drive directly beneath <u>parallel to</u> the lines.

4.1-49 The third sentence in the first paragraph under the heading **Olsen Road** has been revised as follows:

Construction of the proposed Presidential Substation, a new 66/16 kV low-profile distribution substation on an approximate <u>4-acre5.4-acre</u> site, would involve installation/construction of:

4.1-52 *The first sentence of the first paragraph on page 4.1-52 has been revised as follows:*

Implementation of Mitigation Measures 4.1-3a and 4.1-3b would require measures to reduce pole visibility (i.e., self-weatherizing steel or appropriate colors, finishes, textures, as well as non-specular and non-reflexive materials), to lessen views of the Proposed Project from sensitive viewers.

4.1-52 *Mitigation Measure 4.1-3b* has been changed to refer the reader to *Mitigation Measure 4.1-2a*:

Mitigation Measure 4.1-3b: <u>Implement Mitigation Measure 4.1-2a</u>. For all structures that are visible from Olsen Road, SCE shall install tubular steel poles or

light-weight steel poles made of self-weatherizing steel, which would oxidize to a natural-looking rust color within about one year.

Alternately, in lieu of installing self-weatherizing steel poles SCE may install standard-tubular-steel or light-weight steel poles and apply surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape. For structures that are visible from one or more sensitive viewing location, the darker color shall be selected, because darker colors tend to blend into landscape more effectively than lighter colors, which may contrast and produce glare. At locations where a tubular steel pole or light-weight steel pole would be silhouetted against the skyline, non-reflective, light-gray colors shall be selected to blend with the sky. SCE shall develop a *Structure Surface Treatment Plan* for the tubular steel poles, light-weight steel poles, and any other visible structures.

4.1-54 Under **Impact 4.1-5** the description of the impacts of two underground duct banks in the second paragraph has been altered to read:

The proposed duct bank would be constructed under the existing bike lane on Olsen Road, which-and would be cleaned up and restored to preconstruction conditions after construction, in accordance with the applicable SCE franchise agreements and/or the encroachment permits. Visual contrast would be weak, and the presence of work crews would not dominate the viewshed. As such, impacts outside the Substation perimeter walls would be adverse, but not significant.

4.1-54 The following change has been made to the first paragraph under **Impact 4.1-6**:

Each pull site would be cleaned up and restored to preconstruction conditions after construction-in accordance with the applicable SCE franchise agreements and/or the agreements with the property owner.

4.1-55 Under Impact 4.1-8, the third sentence in the first paragraph under the heading **Proposed Presidential Substation** has been revised as follows:

As discussed above, the Proposed Project would construct the proposed Presidential Substation, a new 66/16 kV low-profile distribution substation on an approximate <u>4-acre 5.4-acre site</u> on Olsen Road.

4.1-56 Under **Impact 4.1-8**, the heights of the TSPs referred to in the second paragraph have been revised to read:

From the perspective of a passing motorist, the Proposed Project would replace the existing wooden poles (34-71.5 feet) and 16 kV distribution lines with: an industrial substation partially screened by an eight-foot high tan block wall; an asphalt turning lane and driveway; 70-60 to 100-foot high TSPs and subtransmission lines; and new landscaping along the north and east perimeter

walls, including a mixture of groundcover, shrubs, and trees (see Chapter 2, *Project Description*, for more information on landscaping.)

4.1-56 Starting with the last sentence of the third paragraph under **Impact 4.1-8**, the analysis has been updated as follows:

However, in consideration of <u>as indicated by</u> the site's scenic zoning designation, <u>the</u> <u>site is a visually sensitive location</u>, and the resulting visual impact would be adverse and potentially significant.

As described in Chapter 2, Project Description, prior to the start of the proposed Presidential Substation construction, SCE would submit a landscaping plan and perimeter wall design to the City of Thousand Oaks for review and approval as part of the grading permit application for the Proposed Project. Mitigation Measure 4.1-8a would ensure that this design development and review process would consider the need to maximize screening of the Substation using trees, shrubs, other landscaping and appropriate wall design. In addition, Mitigation Measures 4.1-8ab would require measures to reduce pole visibility (i.e., self-weatherizing steel or appropriate colors, finishes, textures, as well as non-specular and non-reflective materials), to lessen views of the Proposed Project from sensitive viewers. However, even with implementation of Mitigation Measures 4.1-8a and 4.1-8b, the Proposed Project would substantially alter the intrinsic character of the existing roadway view in terms of its composition and the general scale of landscape elements. As shown in Figures 4.1-7a and 4.1-7b, the poles reaching above the Substation would be viewed from a low vantage point by motorist, and could be against a backdrop of the sky. Implementation of this these mitigation measures would not reduce this impact below a significant level; therefore the impact would remain significant and unavoidable.

Mitigation Measure 4.1-8a: SCE will submit to the City of Thousand Oaks a landscaping plan and perimeter wall design that maximizes screening of the Presidential Substation using trees, shrubs, other landscaping, and appropriate wall design, as part of the grading permit application for the Project.

Mitigation Measure 4.1-8ab: Implement Mitigation Measure 4.1-2b and Mitigation Measure 4.1-3b.

Significant Significance After Mitigation: Significant Unavoidable.

4.1-59 The following has been added to the third sentence of the second paragraph under the heading **Park and Recreation Areas**:

As seen in Simulation H, the LWS poles and single-circuit subtransmission line would be within <u>middleground/background</u> view, and would be barely discernible within this viewshed.

4.1-59 Under the heading **Park and Recreation Areas**, the fourth paragraph has been revised to read:

Mitigation Measure 4.1-8b would require measures to reduce pole visibility (i.e., self-weatherizing steel or appropriate colors, finishes, textures) to mitigate visibility of the Proposed Project for sensitive viewers, including visitors to Underwood Family Farm. With implementation of Mitigation Measure 4.1-8e4.1-8b, the overall visual change would be low to moderate, and impacts to Underwood Family Farm visitors would be less than significant.

4.1-59 Mitigation Measure 4.1-8b has been removed as follows:

Mitigation Measure 4.1-8b: Implement Mitigation Measures 4.1-2a and 4.1-2b.

4.1-59 The significance statement after **Mitigation Measure 4.1-8b** has been removed as follows:

Significant after Mitigation: Less than Significant.

4.1-60 *The City of Thousand Oaks has been added as a recipient of the* Construction and Operation Lighting Mitigation Plan *in the first paragraph under Mitigation Measure 4.1-9a*:

SCE shall submit a *Construction and Operation Lighting Mitigation Plan*, which includes a photometric analysis indicating that these objectives would be achieved under SCE's proposed lighting design, to the <u>City of Thousand Oaks and the</u> CPUC for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SCE shall not order any exterior lighting fixtures or components until the *Construction and Operation Lighting Mitigation Plan* is approved by the <u>City of Thousand Oaks and the</u> CPUC.

4.1-60 The number of incandescent lamps at the proposed Presidential Substation has been updated in the first paragraph under the heading **Proposed Presidential Substation**:

Lighting at the proposed Presidential Substation would consist of approximately fifteen thirty 120 volt incandescent lamps rated at 120 watts.

4.1-63 The following additions have been made to the first two sentences in the third paragraph under the heading Alternative Subtransmission Alignment 1:

Alternative Subtransmission Alignment 1 differs from the Proposed Project in that it proposes approximately 1.9 miles of new ROW north of the proposed Presidential Substation site <u>and additional land rights for access that may not</u> <u>follow the subtransmission line</u>. This new ROW <u>and associated access road</u> would not follow any designated or eligible scenic roads; it would, however, be adjacent to three equestrian centers (CastleRock Farms, Elvenstar, and Rancho Linda Mio Riding Club), and would be visible within the viewshed of the Ronald Reagan Presidential Library from a distance of approximately 0.2 mile.

4.1-64 The third paragraph under heading **Alternative Subtransmission Alignment 2** has been revised to read:

Alternative Subtransmission Alignment 2 would differ from the Proposed Project in that <u>itthe subtransmission alignment</u> would not cross, parallel, or be visible from Moorpark Road or Read Road (Eligible County Scenic Highways). Therefore, there would be no impact to these roads. <u>A telecommunication line would be</u> required for this alternative, which would travel west from the Presidential Substation site under Hwy 23 and along Read Road; however, the telecommunication line would be located on existing distribution poles, and the visual change would be imperceptible. Overall impacts to views from Moorpark Road and Read Road would be less than under the Proposed Project.

4.1-65 Under the heading Alternative Subtransmission Alignment 3, the second paragraph has been modified as follows:

Impacts associated with operation of Alternative Subtransmission Alignment 3 would be substantially less than those associated with the Proposed Project. Impacts at the proposed Presidential Substation site would be less than the Proposed Project because poles within the Substation and on Olsen Road would be eliminated, with the exception of the potential for one TSP Riser Pole located outside the substation. However, like the Proposed Project, impacts to the site would remain significant and unavoidable (Class I). Visual impacts to scenic roads would be less than those for the Proposed Project east of Sunset Valley Road because wooden poles in this segment would not be removed, and subtransmission facilities would be underground, eliminating. Although this portion of the alignment may require access roads for construction and maintenance, and potential retaining walls to provide adequate stability, compared to the Proposed Project it would reduce or eliminate the introduction of new industrial features within the viewshed as well as and the need for tree removal. Impacts on the Read Road viewshed west of Sunset Valley Road would be substantially less than the Proposed Project (Class III), as would subtransmission alignment impacts to Hwy 23 and Olsen Road (No ImpactClass III). Specifically, the alternative subtransmission alignment would not be visible from either Hwy 23, and would only be visible from or Olsen Road, and no retaining wall would be required on the east side of Hwy 23. if a TSP Riser Pole is required outside the substation. Impacts to Moorpark Road and Tierra Rejada Road would be the same as the Proposed Project (Class III).

4.1-65 Under the heading Alternative Substation Site B, the following impact statement has been added following the first paragraph:

Impact 4.1-10: Alternative Substation Site B could substantially degrade the existing visual character or quality of the project site and its surroundings from public views. *Less than significant with mitigation* (Class I)

4.1-66 The discussion of **System Alternative B** has been removed:

System Alternative B

Under System Alternative B, no new facilities would be constructed, and all changes would take place on and around existing facility footprints. Construction impacts would consequently be less than the Proposed Project and would be less than significant. Operation of this alternative would not affect scenic vistas, scenic resources, or the existing visual character of the surrounding area, and would not create any additional source of light or glare (No Impact).

Section 4.2, Agricultural and Forestry Resources

4.2-1 Under the heading **Important Farmland**, the definition of Prime Farmland has been expanded to include the following:

Land must have been used for irrigated agricultural production at some point during the four years prior to the mapping date.

4.2-1 Under the heading *Important Farmland*, the definition of Farmland of Statewide Importance has been expanded to include the following:

Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

4.2-2 Under the heading **Important Farmland**, the definition of Unique Farmland has been expanded to include the following:

Land must have been cropped at some time during the four years prior to the mapping date.

4.2-2 Under the heading **Important Farmland**, the second paragraph is clarified as follows:

Table 4.2-1 shows the acres of Farmland in Ventura County in 2006 and 2008, as well as the amount of recent Farmland conversions. Table 4.2-2 shows the miles of ROW of the Proposed Project and alternatives that would cross Farmland <u>mapped</u> by the FMMP. Table 4.2-2 does not include Alternative Substation Site B or System Alternative B because neither of these alternatives this Alternative would be located on Farmland.

4.2-6 *The following heading and text are corrected as follows:*

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City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

While CPUC General Order No. 131<u>-D</u> explains that local land use regulations would not apply to the Proposed Project, there are also no goals or policies identified in the City of Thousand Oaks General Plan that otherwise would be applicable to the Proposed Project and alternatives (City of Thousand Oaks, 1997; City of Thousand Oaks, 2009a).

4.2-6 *The following heading is corrected as follows:*

City of Thousand Oaks Municipal Code: Zoning Ordinance (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.2-7 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.2-7 *The following heading is corrected as follows:*

City of Simi Valley Municipal Code: Zoning Ordinance (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.2-8 Under the heading **Impacts and Mitigation Measures**, the first sentence has been expanded to include the following:

Based on the *CEQA Guidelines*, the analysis considers whether the Proposed Project would result in impacts to Farmland <u>and/or Forest Land</u>.

4.2-8 Under the heading, **Impact 4.2-1**, the first two paragraphs have been corrected to reflect that the Proposed Substation would not be located on Farmland:

Proposed Project construction would cause temporary disturbance to Farmland due to construction methods that would be used to complete the various components of the Proposed Project including subtransmission alignment construction, distribution line relocation, and installation of telecommunication lines, and construction of the proposed Presidential Substation. Temporary impacts to Farmland could-would occur at construction sites located on Farmland, including a temporary marshalling yard, impacts at work areas, conductor pulling/stringing set-up locations, and access routes to poles along the subtransmission line alignment.

No temporary impacts to Farmland would occur at the proposed Presidential Substation site, as the <u>4-acre Substation footprint is 2.5 acres on which the</u> <u>Substation would be constructed are</u> not designated Farmland. No temporary impacts would occur from the use of the temporary marshalling yard, as the marshalling yard would be located at the existing Moorpark Substation (in the City of Moorpark), Thousand Oaks Service Center (in the City of Thousand Oaks); Pardee Substation (in the City of Santa Clarita); and/or an approximately 3-acre commercial facility site located within approximately 5 miles of the construction area. SCE would ensure that the constructing marshalling yard is zoned to allow the use of marshalling and/or staging yards; as such, it would not be an agricultural site and is not land that has been designated as either Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

4.2-10 Under the heading, **Impacts 4.2-2** b), the second sentence is revised as follows:

The proposed subtransmission alignment would be located within <u>exitingexisting</u> ROW currently being used for 16 kV distribution lines in unincorporated Ventura County and the City of Thousand Oaks, and would not conflict with zoning designations in either of these jurisdictions (*A-E* in Ventura County and *RPD-0.22U-SPD-PR*, *RE - 5AC*, *OS*, and *OS-PR* in the City of Thousand Oaks) (No Impact).

4.2-11 Under the heading **Impacts 4.2-2** c), the second paragraph, second sentence is revised as follows:

The principal natural communities at the <u>4-acre5.4-acre</u> proposed Presidential Substation site are coastal sage scrub, chamise chaparral and non-native grassland (Bonterra, 2008).

4.2-11 Under the heading **Impacts 4.2-2** c), the text has been amended to better reflect existing conditions:

However, the proposed subtransmission alignment would be located <u>primarily</u> in an <u>established utility corridor in existing SCE ROW existing road ROW that contains</u> <u>existing utility facilities</u>. Being located in <u>SCE existing road</u> ROW would preclude the land from being managed for one or more forest resources; thus the proposed subtransmission alignment portion of the Proposed Project does not meet the definition of "forest land" or "timberland."

4.2-11 Under the heading **Impacts 4.2-2** *d*), the first sentence is clarified as follows:

As discussed under criterion $\frac{d}{d}$ <u>c) above</u>, there are no areas of forest land or timberland located within the project area, and the Proposed Project would not traverse any land used for growing trees for commercial production of timber or other forest products.

4.2-12 Under the heading **Impacts 4.2-3**, the second paragraph, second sentence is revised as follows:

This could have an adverse affect on agriculture (Valberg, 2010).

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4.2-14 *The following text has been removed:*

System Alternative B

Under System Alternative B, no new facilities would be constructed, and all changes would take place within existing facility footprints and would cause no impact to agriculture and forestry. Implementation of this alternative would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Implementation of System Alternative B also would not conflict with existing zoning for agricultural use, or a Williamson Act contract, or involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. Finally, this alternative would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

4.2-15 *The following references have been revised as follows:*

References – Agricultural and Forestry Resources

- CDC, 2007. Williamson Act Program Farmland Security Zones, Questions and Answers, 2007.
- City of Thousand Oaks, 2009c. City of Thousand Oaks Municipal Code, Title 5, adopted March 13, 2009.

FMMP, see CDC, Farmland Mapping and Monitoring Program.

Section 4.3, Air Quality

4.3-5 *The following text heading has been removed:*

System Alternative B

System Alternative B would require upgrades at existing Royal, Thousand Oaks, and Potrero substations. Royal and Potrero substations are surrounded by commercial uses; however, Thousand Oaks Substation is surrounded by multi- and single-family residences as close as 35 feet from the substation, and Pinecrest School is approximately 300 feet to the east of the substation.

4.3-9 Under the heading 2007 Air Quality Management Plan, the second paragraph has been amended as follows:

The new control measures are proposed revisions to existing VCAPCD rules that VCAPCD staff has found practicable for Ventura County-pursuant.

4.3-11 The following revisions have been made to the air quality Impact 4.3-1 discussion to reflect SCE's revised emission estimates, starting at the second paragraph:

As part of the CPUC's permit application process During the DEIR public comment period, SCE provided revised construction emissions estimates for the majority of construction activities that would be associated with the Proposed Project. It should be noted that at the time the emission estimates were prepared, the Proposed Project did not include the underground open trench subtransmission installation, the Hwy 23 undercrossing, or the underground distribution and telecommunication; therefore, SCE's emission estimates do not include emissions related to those activities. Exhaust emissions were estimated using emission factors from CARB's EMFAC2007 and Offroad2007 emissions models (see Appendix C DEIR Comment SCE-31 for details associated with the Proposed Project emission estimates).

To estimate peak daily construction emissions that would be associated with construction of the Proposed Project, a reasonable worst-case scenario was developed in order to identify the types of construction activities that would overlap in schedule and would contribute to the combined total maximum daily emissions. For the purposes of this analysis, it is assumed that the construction activities associated with grading civil work for the Presidential Substation, open trench activities for underground installation of the subtransmission line, subtransmission line steel pole framing and setting, tubular steel pole (TSP) footing and installation, and material deliveries for the subtransmission line, subtransmission line bore activities associated with the Hwy 23 undercrossing, the civil work related to the underground distribution, and the overhead subtransmission line conductor installation, and the civil work for the Olsen Road Getaway would overlap in schedule, representing the peak day construction scenario. As discussed above, open trench construction emissions were not included in the SCE's emission estimates for the project; therefore, ESA has independently estimated the daily emissions that would be associated with the open trench underground subtransmission line construction activities (see Appendix C, Table 29). For consistency, ESA used the same general methods and emissions factors that SCE used for its emission estimates.

Table 4.3-3 presents the estimated peak day construction emissions that would be associated with the Proposed Project. As indicated in the table, grading the proposed Presidential Substation site the overhead subtransmission line conductor installation would be the most air polluting construction activity associated with the Proposed Project given the volume of material handling and hauling that would occur greater amount of equipment that would be required on a daily basis. However, because Substation grading the overhead subtransmission line conductor installation would start not occur at the beginning of the construction phase-and would occur over a relatively short duration (i.e., approximately three to four
months), it is reasonable to assume that substation grading those activities would not occur at the same time as the underground subtransmission line installation substation grading, steel pole framing and setting, or TSP footing installation activities associated with. It is also assumed that the Hwy 23 undercrossing nor would it not occur at the same time as the installation of the underground distribution and telecommunications open trench subtransmission line installation or during the Olsen Road Getaway activities.

	Peak Day Emissions (lb/day)							
Emission Sources	ROC	NOx	со	PM ₁₀	PM _{2.5}			
Substation Grading	9.4	92.5	<u>41.2</u>	4.4	4.1			
Open Trench Subtransmission Line Installation	6.1	52.5	23.5	2.6	2.3			
Steel Pole Framing and Setting	6.6	51.0	25.9	2.8	2.5			
TSP Footing and Installation	<u>6.2</u>	54.5	23.0	<u>2.7</u>	<u>2.4</u>			
Subtransmission Line Material Delivery	0.5	2.4	2.5	0.2	0.2			
Substation Civil	<u>2.7</u>	<u>17.6</u>	<u>15.9</u>	<u>1.2</u>	<u>1.1</u>			
Subtransmission Line Bore	5.4	46.1	<u>25</u>	<u>2.1</u>	<u>1.9</u>			
Distribution Underground Civil	<u>4.4</u>	<u>34.1</u>	<u>22.4</u>	<u>2.1</u>	<u>2</u>			
Subtransmission Conductor Installation	<u>8.3</u>	<u>88.7</u>	<u>34.6</u>	<u>2.9</u>	<u>2.7</u>			
Olsen Road Getaway Civil	<u>1.6</u>	<u>11.3</u>	<u>7.7</u>	<u>1.0</u>	<u>0.8</u>			
Total Maximum Daily Emissions	28.8 <u>22.4</u>	252.9 <u>197.8</u>	116.1 <u>105.6</u>	12.7 <u>9.3</u>	11.5 <u>8.5</u>			
VCAPCD Thresholds	25	25						
Significant Impact?	Yes <u>No</u>	Yes	No	No	No			

TABLE 4.3-3
PROPOSED PROJECT PEAK DAY CONSTRUCTION EXHAUST EMISSION ESTIMATES

NOTES: See Appendix C Draft EIR Comment SCE-31 for all assumptions and emissions factors used to estimate the peak day construction emissions for the Proposed Project. It is assumed that construction activities related to the proposed subtransmission line undercrossing of Hwy 23, and the underground distribution and telecommunication would commence after Substation grading is complete. Peak day emissions associated with the subtransmission line undercrossing of Hwy 23, and the underground distribution and telecommunication are assumed to be similar to or less than those estimated for Substation grading.

4.3-12 The following revisions have been made to the Impact 4.3-1 discussion and associated Mitigation Measure 4.3-1, starting at the second paragraph:

Therefore, as the Lead Agency for the review of the Proposed Project, the CPUC has elected to use the VCAPCD thresholds of significance to assess the significance of short-term construction equipment exhaust emissions. As indicated in Table 4.3-3, Proposed Project construction-related NO_x and ROC emissions would be more than the significance threshold, resulting in a significant impact. Therefore, implementation of Mitigation Measure 4.3-1, which requires a 20 percent reduction in construction-related NO_x and ROC emission levels compared to the most recent CARB fleet average, shall be required.

With regard to the estimated <u>ROC</u>, CO, PM₁₀, and PM_{2.5} exhaust emissions presented in Table 4.3-3, these mass emissions would not exceed any VCAPCD established significance criteria and would be dispersed throughout the study area at the proposed Presidential Substation site and along the proposed subtransmission alignments, as well as along the roads that would be used to access the Proposed Project. Therefore, <u>ROC</u>, CO, PM₁₀, and PM_{2.5} exhaust emissions generated by the Proposed Project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Associated impacts for <u>ROC</u>, CO, PM₁₀, and PM_{2.5} would therefore be less than significant.

Mitigation Measure 4.3-1: For off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles, SCE shall make a good faith effort to ensure achievement of a Project-wide fleet-average 20 percent NO_x and 20 percent ROC reduction compared to the most recent CARB fleet average. A Construction Equipment NO_x and ROC Reduction Plan to achieve these reductions shall be submitted to CPUC for review and approval prior to commencement of construction activities. Construction activities cannot commence until the plan has been approved. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. If SCE determines that the 20 percent NO_x reduction cannot feasibly be achieved, the Construction Equipment NO_x Reduction Plan shall include documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to necessary amounts of equipment with late model engines, engine retrofits, after treatment products, etc.

Implementation of Mitigation Measure 4.3-1 would reduce the Proposed Projectrelated NO_x and ROC exhaust emissions identified in Table 4.3-3 by up to 20 percent. This would reduce the maximum day NO_x and ROC emissions to approximately 202 158 pounds and 23 pounds, respectively. Therefore, although ROC emissions would be reduced to less than significant, NO_x emissions would not be reduced to below the significance level of 25 pounds. The constructionrelated NO_x impact would remain significant and unavoidable.

4.3-13 The second paragraph under Impact 4.3-2 has been revised as follows:

As part of the CPUC's permit application process During the Draft EIR public comment period, SCE provided construction-related fugitive dust emissions estimates for the Proposed Project. The fugitive dust emissions were estimated using methods identified by CARB, USEPA, and the South Coast Air Quality Management District (SCAQMD) (see Appendix C-Draft EIR Comment SCE-31 for details associated with the Proposed Project emission estimates). To estimate peak daily fugitive dust emissions that would be associated with construction of the Proposed Project, a reasonable worst-case scenario was developed in order to identify the types of construction activities that would overlap in schedule and would contribute to the combined total maximum daily emissions. For the purposes of this analysis, it is assumed that the construction activities associated with substation grading, open trench subtransmission line installation, subtransmission line steel pole framing and setting, TSP footing and installation, and material deliveries for the subtransmission line civil work, subtransmission line bore activities associated with the Hwy 23 undercrossing, the civil work related to the underground distribution, and the overhead subtransmission line conductor installation would overlap in schedule, representing the peak daily construction scenario. The estimated peak day construction-related fugitive dust emission that would be associated with the Proposed Project is 255187 pounds per day of PM₁₀ and 2819 pounds per day of PM_{2.5}. The vast majority of these emissions would be associated with vehicle travel on paved and unpaved surfaces.

4.3-19 The first paragraph under Alternative Subtransmission Alignment 1 has been revised as follows:

Although this alternative would include a longer subtransmission line from the Moorpark-Royal No. 2 line, compared to the proposed subtransmission alignment along Sunset Valley Road, it would not require existing distribution to be relocated underground. <u>Undergrounding associated with this alternative would include the subtransmission line at the Hwy 23 crossing and the 16 kV distribution circuits and the telecommunication lines at the intersections of Moorpark Road and Read Road as well as Esperance Road and Tierra Rejada Road to make clearance for the new 66 kV line segment.</u>

4.3-20 The first paragraph under **Alternative Subtransmission Alignment 2** has been revised as follows:

Although this alternative would include longer lengths of subtransmission source lines, compared to the lengths of the proposed subtransmission alignments, it would not require existing distribution to be relocated underground. <u>This alternative would require a telecommunication line that would travel west from the proposed substation site under Hwy 23 and along Read Road. Modification of access roads east of Hwy 23 could also be necessary as would some potential tree removal and/or tree trimming.</u>

4.3-20 The first paragraph under Alternative Subtransmission Alignment 3 has been revised as follows:

Under Alternative Subtransmission Alignment 3, short-term construction activities could result in slightly lower overall criteria pollutant emissions compared to the construction emissions that would result under the Proposed Project because the double circuit subtransmission line would be installed underground along the same route as the Proposed Project underground distribution and telecommunication lines. <u>Under this alternative, additional groundwork would be required compared to the Proposed Project.</u> For the portion of the alignment that will be undergrounded

(from the intersection of Read Rd. and Sunset Valley Rd. east), a large flat pad to accommodate construction vehicles would be constructed as well as turnaround areas, crane pad areas for installing the vault and the construction of access roads meeting current SCE standards for both construction and maintenance operations. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunication line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment. Existing wooden poles carrying 16 kV distribution lines would be removed along Sunset Valley Road from Tierra Rejada Road south to Read Road.

4.3-20 The first paragraph under Alternative Substation Site B has been revised as follows:

Although the development at the Alternative Substation Site B would require complete demolition of all existing structures associated with the previous Ventura County Sherriff's Department, <u>and the construction of an approximately 16 foot high retaining wall on the south side of the parcel. this This site would require considerably less cut and fill construction activities compared to the proposed Presidential Substation.</u>

4.3-21 The text under System Alternative B has been removed as follows:

System Alternative B

Under the System Alternative B, short-term construction activities would result in substantially less criteria pollutant emissions compared to the construction emissions that would result for the Proposed Project. Construction activities under this alternative would primarily be associated with replacing the existing transformers at Royal, Thousand Oaks, and Potrero substations with new transformers. There could also be a need to replace and/or add some distribution equipment at the substations. It is anticipated that peak day construction emissions under the System Alternative B would be similar to the peak daily emissions estimated for the proposed Presidential Substation civil work (see Appendix C Table 7). Peak day NO_{*} emissions under this alternative are estimated to be approximately 22 pounds, which would exceed the significance threshold of 20 pounds. However, implementation of Mitigation Measure 4.3-1 (see Impact 4.3-2 discussion above) would reduce NO_{*} emissions by 20 percent, to approximately 18 pounds. Therefore, construction impacts under the System Alternative B would be mitigated to less than significant associated with short-term generation of NO* on an individual and cumulative basis. Moreover, the System Alternative B would not conflict with the 2007 AOMP, and would result in less than significant impacts related to operations and maintenance, exposing sensitive receptors to DPM, coccidioides immitis spores, and odors.

Section 4.4, Biological Resources

- **4.4-1** Under the heading **4.4.1** Settings, the follow bullet points have been revised:
 - California Department of Fish and Game (CDFG) California Natural Diversity Database (CNDDB) (CDFG, 2011CDFG, 2012)
 - The California Native Plant Society (CNPS) online database (CNPS, 2011CNPS, 2012)
 - Results of the Focused Presence/Absence Surveys for the Coastal California Gnatcatcher <u>in 2010 and 2012</u> (Bonterra, 2010a; 2012)
 - Special Status Plant Surveys (Bonterra, 2009; 2011)
 - <u>Certified Arborist Assessment (BioResource Consultants, Inc., 2011)</u>

4.4-1 Under the heading **4.4.1 Settings**, the following paragraph has been revised:

Field In addition to the above surveys, field reconnaissance surveys of the Proposed Project and alternatives were performed by Environmental Science Associates (ESA) ecologist Mitchell Jenkins and senior wildlife biologist Brian Pittman (Certified Wildlife Biologist) on February 10, 2009, and again on April 20, 2009 by ESA senior ecologist Greg Ainsworth.

4.4-2 Under the heading Vegetation Community Descriptions, the second paragraph is revised as follows:

The vegetation types that occur in the project area include coastal sage scrub, coastal sage scrub/coast prickly pear succulent scrub, coastal sage, chaparral scrub, chamise chaparral, non-native grassland, freshwater marsh, willow riparian scrub, mule fat scrub, oak woodland, California walnut woodland, agriculture, ornamental/developed, ruderal (disturbed), and disturbed (<u>ruderal)</u> areas.

4.4-2 Under the heading Non-native Grassland, the second sentence of the paragraph is revised as follows:

Grasslands in the project area consist of both disturbed and <u>relativerelatively</u> intact habitat. Disturbed areas that have been subject to ongoing residential and agricultural pressures occur adjacent to Read Road and Sunset Valley Road.

4.4-4 Under the heading **Proposed Presidential Substation**, the first sentence of the first paragraph is revised as follows:

The principal natural communities at the <u>4 acre<u>5.4 acre</u> proposed Presidential Substation site are coastal sage scrub, chamise chaparral and non-native grassland (Bonterra, 2008).</u>

4.4-5 Under the heading Sensitive Plant Communities, the second sentence of the first paragraph is amended as follows:

Sensitive natural communities that occur in the study area <u>andbut</u> would not necessarily be affected by the Proposed Project include freshwater marsh, California walnut woodland, and willow riparian scrub.

4.4-7 Under the heading **Wildlife Movement and Corridors**, the second paragraph is amended as follows:

Ongoing projects in the area by the National <u>ParksPark</u> Service, CalTrans, the Santa Monica Mountains Conservancy, and others have been working to improve the functionality of the area as a wildlife corridor in connecting the areas mentioned above.

4.4-7 Under the heading **Special-Status Species**, the second paragraph is amended as follows:

Critical habitat is further described in the Biological Resources *Regulatory Setting* <u>Context</u> discussion below. Figure 4.4-1 and Figure 4.4-2 displays known occurrences of special-status plant and wildlife species in the study area, and designated critical habitat, respectively. A list of special-status species reported or expected to occur within the study area as well as information pertaining to natural communities of special concern was compiled on the basis of data in the PEA (SCE, 2008), Bonterra (2008, 2011) biological studystudies, CNDDB (CDFG, 2011 <u>CDFG, 2012</u>), CNPS online database (CNPS, 2011 <u>2012</u>), field surveys and other available scientific databases.

4.4-10 *Table 4.4-1*, has been revised as shown on the following page.

4.4-16 Under the heading **Special-Status Species**, the first sentence of the second paragraph is revised as follows:

Suitable habitat for California Orcutt grass (vernal pools) is not present in the study area. Suitable habitat is present for Braunton's milk-vetch, Agoura Hills dudleya, Conejo dudleya and Lyon's pentachaeta; though only Lyon's pentachaeta is reported near the study area (CDFG, 20112012).

4.4-16 Under the heading **Braunton's milk-vetch**, the first paragraph is revised as follows:

A general plant and wildlife survey was completed during the typical January through August blooming period for this species and focused botanical surveys were also conducted during the blooming period (CNPS, 20112012; Bonterra, 2009; 2011).

TABLE 4.4-1 SPECIAL-STATUS SPECIES KNOWN OR WITH POTENTIAL TO OCCUR IN THE STUDY AREA

Listing	Potential for Species Occurrence in the Project Area										
Common Name Scientific Name		General Habitat	Proposed Substation	Proposed Subtransmission Alignment	Alternative Subtransmission Alignment 1	Alternative Subtransmission Alignment 2	Alternative Subtransmission Alignment 3	Alternative Substation Site B			
Reptiles											
FEDERAL OR STATE SPECIES OF SPECIAL CONCERN											
<u>Silvery legless lizard</u> <u>Anniella pulchra</u> <u>pulchra</u>	<u>/CSC</u>	Local occurrence (5 mi. from project) is from loamy soil within coastal sage scrub /oak woodlan habitat	Low Potential. limited suitable habitat	Low Potential, limited suitable habitat	Low Potential. limited suitable habitat	Low Potential. limited suitable habitat	Low Potential, limited suitable habitat	Low Potential, limited suitable habitat			
STATUS CODES:Federal (U.S. Fish and Wildlife Service):State (California Department of Fish and Game):B&GEPA= Golden and Bald Eagle Protection ActSE=Listed as Endangered by the State of CaliforniaFE=Listed as Endangered by the Federal GovernmentST=Listed as Threatened by the State of CaliforniaFT=Listed as Threatened by the Federal GovernmentST=Listed as Threatened by the State of CaliforniaWL=Birds on CDFG Watch ListCFP=California fully protected species SDSD=State Delisted			nia Li ia	California Native Plant Society (CNPS): List 1B = Plants rare, threatened, or endangered in California and elsewhere							
SOURCES: CPNS, 2011; CDFG, 2011 <u>CPNS, 2012 ; CDFG, 2012</u> ; Bonterra, 2008; 2009; 2010a; 2010b; 2010c <u>: 2011; 2012</u>											

4.4-17 Under the heading Agoura Hills Dudleya, the first paragraph is revised as follows:

In the vicinity of the Proposed Project, this species has been reported along Hwy 23 between Potrero Road and Carlisle Road (CDFG, <u>20112012</u>).

4.4-17 Under the heading **Conejo Dudleya**, the first paragraph is revised as follows:

This perennial herb generally occurs in rocky soils and rock outcrops between 120 and 1,350 feet elevation in coastal sage scrub and valley and foothill grasslands (CNPS, <u>20112012</u>). In the vicinity of the Proposed Project, this species has been reported between Moorpark Road and Olsen Road at the head of the Arroyo Santa Rosa (CDFG, <u>20112012</u>).

4.4-17 Under the heading **California Orcutt Grass**, the third sentence of the first paragraph is revised as follows:

In the vicinity of the Proposed Project this species has been reported from USGS Thousand Oaks and the Tierra Rejada Valley 7.5-minute quadrangles (CDFG, <u>20112012</u>).

4.4-17 Under the heading Lyon's Pentachaeta, the text has been amended as follows:

This annual herb occurs in rocky, clay soils in chaparral, coastal sage scrub and valley and foothill grasslands between 100 and 2,000 feet elevation (CNPS, 20142012). This species was reported in 1992 in disturbed coastal scrub/cactus scrub approximately 500 feet southwest of the proposed Presidential Substation footprint (Figure 4.4-1) (CDFG, 20112012). Several focused botanical surveys were conducted in search of this species (Bonterra, 2009; 2011). A reference site was visited prior to conducting focused surveys to verify the blooming period of this species. The high number of individuals found in a nearby reference population (350 to 400 plants in April 2010, and 300 to 400 plants in May 2010) suggests adequate rainfall, locally, to detect this species during the survey year (Bonterra, 2009).

Previous studies detected this species in the study area; however, this species was not observed during surveys of the proposed Presidential Substation site; proposed subtransmission alignment, or Alternative Substation Site B. <u>Based on protocol-level</u> <u>survey findings, Lyon's pentachaeta populations do not occur on or adjacent to the proposed Presidential Substation site and additional surveys for this species are not warranted.</u> Low quality habitat is present on portions of Alternative Subtransmission Alignment 1 located north of the proposed Presidential Substation site, and also in roadside habitat along Alternative Subtransmission Alignment 2. The high number of individuals found in a nearby reference population (350 to 400 plants in April 2010, and 300 to 400 plants in May 2010) suggests adequate rainfall, locally, to detect this species (Bonterra, 2009).</u>

On November 14, 2006, the USFWS published the Final Rule designating critical habitat for Lyon's pentachaeta (USFWS, 2006). This designation includes approximately 3,396 acres in Ventura, Los Angeles, and Orange Counties, California. The <u>A portion of the</u> Proposed Project is located near, but outside of within Subunit 1C of the Simi Valley Critical Habitat Unit for this species. <u>Ground disturbance would occur adjacent to but not occur within designated critical habitat for Lyon's pentachaeta.</u>

4.4-19 Under the heading **Riverside Fairy Shrimp**, the third sentence of the first paragraph is revised as follows:

Riverside fairy shrimp have been identified north of the northern portion of the proposed subtransmission alignment (CDFG, 2011 CDFG, 2012).

4.4-19 Under the heading **Coastal California Gnatcatcher**, the first paragraph is amended as follows:

This species has been reported approximately 1 mile from the Proposed Project and alternatives (CDFG, <u>20112012</u>). Focused surveys to determine the presence <u>or</u> <u>absence</u> of this species <u>in the project area</u> were conducted 14 times during the summer and autumn of 2008 (Bonterra, 2008)<u>, and</u> 9 times in 2010 (Bonterra, 2010a), and repeated again in 2012 (Bonterra, 2012).

4.4-19 Under the heading Coastal California Gnatcatcher, the second paragraph is revised as follows:

Moderately suitable habitat for this species occurs in the coastal sage scrub and disturbed coastal sage scrub on the proposed Presidential Substation site.; however, use of this area was not detected during focused surveys A In 2010, a juvenile California gnatcatcher was detected from coastal sage scrub/coastal prickly pear succulent scrub habitat located about 1,100 feet southwest of the proposed Presidential Substation site (Bonterra, 2010a). Follow-up surveys in 2012 found two pairs of coastal California gnatcatchers on the Proposed Substation Site and one pair was observed on the proposed subtransmission alignment (Bonterra, 2012). Surveys did not detect this species on the proposed subtransmission alignment, Alternative Subtransmission Alignment 2, Alternative Subtransmission Alignment 3, or at Alternative Substation Site B.

4.4-20 Under the heading **Bank Swallow**, the first paragraph is amended as follows:

This species record comes from an 1864 collection of bank swallow eggs in the vicinity of Lake Sherwood (CDFG, 20112012).

4.4-21 Under the heading Jurisdictional Waters of the U.S., Including Wetlands, the first sentence of the third paragraph is revised as follows:

Presidential Substation Project A.08-12-023) Final Environmental Impact Report Along the proposed subtransmission alignment and alternative subtransmission line alignments, the relatively small footprint of the pole sites and the long spans between poles would allow avoidance of may potentially impact jurisdictional areas as some jurisdictional areas occur in the project area.

4.4-26 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; Alternative B)

4.4-27 The following heading is corrected as follows:

City of Thousand Oaks Municipal Code Chapter 24: Landmark Tree Preservation and Protection (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.4-28 The following heading is corrected as follows:

City of Thousand Oaks Municipal Code, Chapter 14: Oak Tree Preservation and Protection (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.4-30 The following heading is corrected as follows:

City of Thousand Oaks Municipal Code, Chapter 28: Tree Pruning (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.4-31 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.4-32 The following heading is corrected as follows:

City of Simi Valley Municipal Code Chapter: Mature Tree Preservation Ordinance (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.4-33 Under the heading **4.4.3** Applicant Proposed Measures, the following text has been added:

<u>APM-BIO-03: Additional Biological Resource APMs.</u> SCE may propose additional <u>biological resource</u> APMs following receipt of results of focused surveys that would be conducted as part of the Proposed Project, and consultation with appropriate agencies.

4.4-36 *Impact 4.4-2*, fourth paragraph, is revised as follows:

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About 3.5 acres of coastal sage scrub habitat on the proposed Presidential Substation site is suitable to support coastal California gnatcatcher and would be removed by the Proposed Project. Protocol-level surveys were performed in this area in 2008, and again in 2010 and 2012, and gnatcatchers were not observed on orand adjacent to the site. However, a juvenile California gnatcatcher was detected about 1,100 feet from the site in association with coast sage scrub/coast prickly pear succulent scrub habitat. On the basis of this finding, there is potential thatBased on these findings, coastal California gnatcatchers could breed on or adjacent to the Proposed Presidential Substation site at a later date. Protocol-level surveys for coastal California gnatcatcher surveys also considered the proposed subtransmission alignment; however, this species was not detected and is considered absent from the alignment. Because the gnatcatcher was not identified on the Proposed Presidential Substation site during protocol-level surveys and the site is outside of designated critical habitat for this species, and a gnatcatcher pair was detected on this alignment as well. Based on these findings, the USFWS and CDFG may concur with survey findings and not require compensation for formal consultation for coastal California gnatcatcher impacts and coastal sage scrub habitat losses under the FESA.

4.4-36 Impact 4.4-2, sixth paragraph, is revised as follows:

Designated critical habitat for coastal California gnatcatcher occurs on the proposed subtransmission alignment. The implementation of Mitigation Measure 4.4-2a and 4.4-2b would reduce impacts to Coastal California gnatcatcher to less than significant.

4.4-36 The following changes have been made to **Mitigation Measure 4.4-2b**:

Mitigation Measure 4.4-2b: Where impacts to coastal sage scrub cannot be avoided (e.g., at the proposed Presidential Substation site <u>and portions of subtransmission alignments</u>), SCE and/or its contractors shall contact CDFG and the USFWS to coordinate coastal scrub avoidance measures that have been incorporated into the project design, and determine if additional measures are needed to reduce impacts to coastal California gnatcatcher habitat. Avoidance measures may include limiting the seasonal timing of work outside the breeding so that active gnatcatcher nesting is not disrupted during construction, limiting project disturbances to the smallest possible area in or near areas with suitable habitat, and providing environmental training to construction workers. In addition, the following actions will be carried out:

- Coastal sage scrub shall be restored at a 1:1 ratio in areas where it is temporarily disturbed. If permanent impacts are anticipated to coastal sage scrub, SCE shall establish new habitat at a ratio of at least 1:1 (one acre of created habitat for each acre lost) to achieve a no-net loss standard.
- A qualified ecologist shall prepare a restoration and mitigation plan in coordination with CDFG <u>and USFWS</u> to mitigate for temporarily temporary

impacts to coastal sage scrub habitat with the intention of restoring habitat for coastal California gnatcatcher. The plan shall include a full description of microhabitat conditions necessary for each affectedtarget vegetation species, seed germination and planting requirements, a description of the supplemental irrigation system, if needed to support site restoration, restoration techniques for temporarily disturbed occurrences, assessments of potential transplant and enhancement sites, success and performance criteria, and monitoring requirements, as well as measures to ensure long-term sustainability. Restoration sites shall be monitored for a period of at least three years to track mitigation success and identify needed adjustments to the restoration program. Plant survival and growth shall be recorded at the same time each year and reported to CDFG on an annual basis using survival and percentage cover as a metric of success. Restored areas shall be considered mature when they achieve 50 percent coverage by native plant species. The mitigation plan shall apply to portions of the project alignment that support restored coastal sage scrub habitat (e.g. at the proposed subtransmission alignment). At a minimum, the mitigation plan shall provide:

- <u>The location of mitigation sites that are selected from suitable lands in</u> the in the local project vicinity;
- <u>A description of native vegetation to be planted or seeded and an</u> estimation of the density and coverage of the final planted areas;
- <u>Site preparation measures that will be employed to encourage</u> vegetation establishment, including the need for supplemental irrigation, erosion control, or other measures as appropriate;
- Measures that would be employed to discourage site invasion by nonnative species, for example, mowing, weeding, and/or herbicide application;
- <u>The source of plantings or seeds that are used in support of site</u> restoration, with a preference for local plant stock wherever possible;
- <u>A schedule for maintaining and monitoring restored areas to include</u> the number of scheduled site visits, actions that will be taken on each site visit, contingency measures to respond to site degradation, need for replanting, invasion by weeds, or erosion;
- The restoration effort shall be considered successful when plant cover reaches 50 percent, or is at least comparable to vegetation cover in disturbed areas, and plants are self-sustaining without supplemental water for a period of at least two years.

Annual monitoring reports shall be prepared to document site progress and measures that were implemented during the prior year. Reports shall be submitted to CDFG and USFWS for review and approval.

4.4-38 *Impact 4.4-4*, first paragraph, is revised as follows:

Many standard designs of electrical industry hardware place conductors and groundwires close enough together that raptors can touch them simultaneously with

their wings or other body parts, causing electrocution. Raptors and other birds may also collide with powerlines, which can be difficult for birds to detect for various reasons such as during night flight or during inclement weather conditions. The type and magnitude of such impacts, and strategies to avoid conflicts between birds and new transmission lines have been well described by the Edison Electric Institute's Avian Power Line Interaction Committee (APLIC).

4.4-38 Under the heading **Impact 4.4-4**, the following paragraph has been added before the last paragraph on page 4.4-38:

Generally, raptor interactions with transmission lines and towers due to collisions occur in areas within migratory pathways that have a high risk for collision. Raptors and other birds may also collide with powerlines, which can be difficult for birds to detect for various reasons such as during night flight or during inclement weather conditions. The Proposed Project is not considered to be within an area of particular raptor concentration and is not considered to have an elevated risk of avian collision with powerline facilities.

4.4-39 The following changes have been made to **Mitigation Measure 4.4-4**:

- Insulate hardware or conductors against simultaneous contact if adequate spacing is not possible. and;
- Use pole designs that minimize impacts to birds, and;.
- Shield wires to minimize the effects from bird collisions

4.4-40 *Impact 4.4-6*, first paragraph, is revised as follows:

The proposed subtransmission alignment is not expected to directly or indirectly impact jurisdictional wetlands in the project area. Identified features would be avoided with a suitable upland construction buffer (e.g., at least 50 feet); therefore, no direct impacts were identified to these features. Drainages that would be spanned by the Proposed Project include Arroyo Santa Rosa and several ditches along Olsen Road. The subtransmission line for the Proposed Project would impact approximately 0.032 acre of "Waters of the U.S" along Sunset Valley Road and approximately 0.004 acre along Tierra Rejada Road. In addition, approximately 0.03 acre of waters under the jurisdiction of the CDFG would be impacted along Sunset Valley Road.

4.4-40 The following changes have been made to Mitigation Measure 4.4-6:

Mitigation Measure 4.4-6a: SCE and/or its contractors shall through project design, avoid <u>and minimize impacts to</u> jurisdictional waters of the U.S. and waters of the State to the maximum extent possible. This includes minimizing the footprint during construction of poles for the proposed subtransmission line and spanning drainages that occur within the alignment.

Mitigation Measure 4.4-6b: In the event of any project changes that involve ground disturbance outside of the boundary of the existing wetland delineation, a new wetland delineation shall be performed.

Mitigation Measure 4.4-666b: Where jurisdictional wetlands and other waters cannot be avoided, e.g., at the Proposed Presidential Substation site, to offset temporary and permanent impacts that occur as a result of the project, restoration, enhancement or compensatory mitigation shall be provided through the following mechanisms:

4.4-41 Under Impact 4.4-7, the last sentence of the first paragraph is revised as follows:

The 4-acre<u>5.4-acre</u> substation <u>site</u> would be positioned immediately adjacent to existing development, which minimizes encroachment into natural habitat and allows continued local wildlife movement.

4.4-41 Under the heading e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, the first paragraph has been amended a follows:

Three local jurisdictions have ordinances protecting trees: Ventura County, the City of Thousand Oaks and the City of Simi Valley. Impacts to trees Trees identified in local ordinances may occur be affected by during construction of the Proposed Project, principally along Read Road. The existing subtransmission line that would be replaced on Read Road spans about 5 dozen large the dripline or Tree Protection Zone²² of 12 native and 43 non-native trees of various species- that are between 6- and 72-inches in diameter (BioResource Consultants, Inc., 2011). A Certified Arborist Assessment in 2011 inventoried the location, species, number and size of trees in the subtransmission line alignment; however, the assessment does not estimate impacts to protected and non-protected trees, or specify impacts that could be encountered from the Proposed Project. The arborist report did not identify the character of anticipated effects, such as whether or not tree removal or trimming is required, or characterize the potential for root damage to individual trees.

Presumably, the proposed subtransmission alignment would follow a similar alignment to the existing distribution line and the removal or trimming of an undetermined number of individual trees may be needed to accommodate the new pole locations. Based on a review of digital aerial photographs, the number of large trees that occur within the alignment appears to be fewer than 20. Based on the Certified Arborist Assessment, excavation from the Proposed Project could potentially affect up to 55 trees along the proposed alignment, due to soil compaction around trees, root exposure, root damage or trimming, resulting in degradation of an individual tree or loss of trees (BioResource Consultants, Inc.,

²² The BioResource Consultants, Inc. (2011) report defines the Tree Protection Zone as the area within 5-feet of the dripline.

2011). However, SCE has committed to complying with local ordinances pertaining to tree removal and modifications, including obtaining permits consistent with the conditions of the local agencies (see Proponent's Environmental Assessment (PEA) page 4-67 et. seq, and Draft EIR Section 4.4, *Biological Resources*, Regulatory Context, pages 4.4-26 through 4.4-32). Such compliance would ensure there is no impact pursuant to CEQA.

4.4-42 Under the heading Alternative Subtransmission Alignment 1, following has been added after the second sentence in the first paragraph:

<u>New facilities that would be located underground under this alternative would not</u> increase or diminish potential impacts to biological resources. Alignment information was not available for potential access roads that may be needed for this alignment; however, such facilities would have similar, if incrementally greater impacts to those discussed for the Proposed Project.

4.4-43 The following heading is corrected as follows:

Impact 4.4-7<u>Impact 4.4-8</u>: Construction activities associated with Alternative 1 could result in adverse impacts to special-status plants species in portion of the alignment located north of the proposed Presidential Substation site. *Less than significant with mitigation* (Class II)

4.4-43 The mitigation numbers in the last sentence of the first paragraph under **Impact 4.4-7** have been corrected to read:

The implementation of Mitigation Measures 4.4-7a 4.4-8a and 4.4-7b-4.4-8b, which require surveys for special-status plants and the implementation of appropriate avoidance measures, would reduce the potential impact to a less-than-significant level.

4.4-43 The following heading is corrected as follows:

Mitigation Measure 4.4-6a: <u>Mitigation Measure 4.4-8a:</u> In portions of <u>the alignment</u> <u>Alternative Subtransmission Alignment 1</u> that have not been surveyed for special status plants...

4.4-43 Under the **Mitigation Measure 4.4-8a**, the last sentence of the second paragraph has been amended a follows:

Exclusion fencing shall be installed and maintained during construction shall install exclusion fencing around sensitive plant populations with as large a buffer as possible to minimize the potential for direct and indirect impacts.

4.4-43 *The following heading is corrected as follows:*

Mitigation Measure 4.4-6b: Mitigation Measure 4.4-8b:

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4.4-44 Under the heading Alternative Subtransmission Alignment 2, the first paragraph has been amended a follows:

Unlike the proposed subtransmission alignment, Alternative Subtransmission Alignment 2 is <u>entirely mostly</u> adjacent to existing roadways; <u>however</u>, <u>modification</u> <u>of access roads located east of Highway 23 and pole replacement for the</u> <u>telecommunication component are not adjacent to existing roadways. In addition,</u> <u>some tree removal and/or tree trimming may be required for this alternative.</u> This alternative alignment has not been surveyed for rare plants and there is a moderate potential that several special-status plant species may occur on or near the proposed alignment based on the availability of potentially suitable habitat (see Table 4-4.1). The implementation of Mitigation Measures <u>4.4-7a 4.4-9</u> and <u>4.4-7b</u> would reduce this potential project effect to special-status plants to less than significant.

4.4-44 The following heading is corrected as follows:

Impact 4.4-8<u>Impact 4.4-9</u>: Construction activities associated with Alternative Subtransmission Alignment 2 could result in less than significant impacts to least Bell's vireo, a federal and State listed Endangered species. *Less than significant with mitigation* (Class II)

4.4-44 Under Impact **4.4-9**, the first paragraph has been revised to read:

The proposed alternative would be located near, or would span the riparian corridor, with poles located greater than 50 feet from the corridor; however, engineering specifications for this alternative are not available, therefore it is possible that some impact could occur to nesting vireos. The implementation of Mitigation Measure 4.4-8 Mitigation Measure 4.4-10 would reduce impacts to least Bell's vireo and their habitat to less than significant.

4.4-44 *The following heading and text has been amended as follows:*

Mitigation Measure 4.4-7 <u>Mitigation Measure 4.4-9</u>: SCE and/or its contractors shall design Alternative Subtransmission Alignment 2 to avoid all impacts to riparian habitat, with poles located greater than 50 feet from the <u>outside of</u> riparian corridors whenever feasible. Because If impacts to riparian habitat would be avoided <u>occur</u>, compensatory mitigation is not required shall be required as described in Mitigation Measure 4.4-6b. Additionally, in the absence of a focused assessment to document the presence or absence of least Bell's vireo, <u>this species shall be presumed present and</u> construction activities near the identified drainage shall occur outside the February 1 through August 31 breeding season described in Mitigation Measure 4.4-3.

If SCE plans to locate facilities within 250 feet of riparian habitat at this location during the least Bell's vireo breeding season, a habitat assessment for least Bell's vireo shall be performed at this location and findings coordinated with the USFWS to determine the need for the full eight survey protocol. If least Bell's vireo are identified during surveys, construction activities at this location must occur outside the breeding season to avoid impacts to this species.

4.4-45 Under the heading Alternative Subtransmission Alignment 3, the first paragraph has been amended a follows:

Alternative Subtransmission Alignment 3

Construction-related impacts associated with this alternative may be similar to the Proposed Project, though the impacts of below grade construction on tree health viability is not known. However, no No pole replacement or related construction would be required between the intersection of Sunset Valley Road and Read Road and the substation. As a result, no tree removal along read Road Road between Sunset Valley Road and Hwy 23 would be required. Based on the Certified Arborist's Assessment prepared for the Proposed Project, impacts to trees on Read Road between Sunset Valley Road and Highway 23 would similarly not conflict with local policies and ordinances protecting trees. The report does not identify the number, size and type of trees that would be affected by below grade construction; thus a direct comparison between the number of trees that would be trimmed or removed under the Proposed Project to the number of trees that would experience root damage or require removal under Alternative Subtransmission Alignment 3 is not available. However, like the Proposed Project, SCE has committed to complying with local ordinances pertaining to tree removal and modifications, including obtaining permits consistent with the conditions of the local agencies. Such compliance would ensure there is no impact pursuant to CEQA. Construction of access roads and removal of 13 avocado trees east of Hwy 23 would not be required. Below grade construction would be similar to the Proposed Project.

4.4-45 Under the heading Alternative Substation Site B, the following has been added before the last sentence of the first paragraph:

The longer construction duration required for this alternative would not substantially affect biological resources, as any delay work would still need to occur in such a manner that protected birds would not be impacted by the project.

4.4-45 *The following heading and text, has been removed:*

System Alternative B

There will be no significant impacts to biological resources associated with this alternative.

4.4-45 Under **References- Biological Resources**, the following references have been updated or added as follows:

BioResource Consultants, Inc., 2011. Certified Arborist Assessment for the Presidential Substation Project in Thousand Oaks, Ventura County, CA. Letter report to Mr. Andrew Keller, Southern California Edison, November 4, 2011.

- Bonterra, 2011. Results of Focused Plant Surveys for the Presidential Substation Project, Ventura, County, California, prepared for Southern California Edison, August 31, 2011.
- Bonterra, 2012. Results of Focused Coastal California Gnatcatcher Presence/Absence Surveys for the Presidential Substation Project, Ventura County, California, prepared for Southern California Edison, August 6, 2012.
- California Department of Fish and Game (CDFG), 2011 2012. California Natural Diversity Database. California Department of Fish and Game, Biogeographic Data Branch, Sacramento, CA, March 18 2011 July 9, 2012.
- California Native Plant Society (CNPS), 2011 2012. Electronic Inventory of Rare and Endangered Plants (online edition, v7-08c), California Native Plant Society, Sacramento, CA, March 18 2011 July 9, 2012.
- Holland, R.F., 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California, State of California, The Resources Agency.
- Ventura County, 2008. Ventura County General Plan: Goals, Policies and Programs, September 9, 2008.

Section 4.5, Cultural Resources

4.5-6 The third sentence of the second paragraph under **Sites Located within the Project Area** has been modified as follows:

The site was subject to Phase II archaeological testing and was proposed as being "ancillary" to CA-VEN-1571. Site CA-VEN-1778 is located approximately 600 feet south of the proposed subtransmission alignment.

4.5-7 Under the heading Native American Contact, the last line of the first paragraph on this page has been revised to read:

Both Ms Salazar-Folkes and Mr. Tumamait requested that ground-disturbing activities be monitored by a Native American monitor.

4.5-7 Under the heading **Phase I Archaeological Survey**, the first sentence has been modified as follows:

A Phase 1 archaeological<u>cultural and paleontological resources</u> survey was conducted in July and August, 2008, by PCR Services Corporation.

4.5-7 Under the heading **Phase I Archaeological Survey**, the second paragraph has been modified as follows:

About 30 percent of the project area was not systematically surveyed due to restricted access or development. In areas of development, systematic survey was not feasible due to the fact that the ground surface was paved and therefore not visible. The entire project area was surveyed for cultural resources. The open space areas in the northern portion of Alternative Subtransmission Alignment 1 (an approximately 1.5 mile segment) were not surveyed due to restricted access. The open space areas in the northern portion of Alternative Subtransmission Alignment 1 (an approximately 1.5 mile segment) were not surveyed due to restricted access.

4.5-7 The following footnote has been added to the word "relocated" in the first sentence of the third paragraph under **Phase I Archaeological Survey**:

Site CA-VEN-744 was relocated¹ during the survey. About 20 pieces of flaked stone debitage and numerous fragments of marine shell were observed. The bedrock milling feature was not relocated.

1 The term "relocated" refers to field verification of a previously identified cultural resource.

4.5-14 The following changes have been made to the **City of Thousand Oaks** heading:

City of Thousand Oaks (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.5-14 The City of Simi Valley heading has been revised to read:

City of Simi Valley (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.5-15 The City of Thousand Oaks heading has been changed to read:

City of Thousand Oaks (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.5-16 The following revisions have been made to the **City of Simi Valley** heading:

City of Simi Valley (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.5-18 Applicant proposed measure APM-PAL-01 has been revised to read:

The Paleontological Monitoring Plan shall also include a final monitoring report. The Paleontological Monitoring Plan shall include a provision for the preparation of a final report at the conclusion of the Proposed Project.

4.5-18 The following changes have been made to the last paragraph under the heading **4.5.3** *Applicant Proposed Measures:*

In addition, as described in Section 2.7.2, Worker Environmental Awareness Training, SCE would include instructions that would guide construction crews on the procedures to follow if cultural <u>or paleontological</u> resources were uncovered during construction.

4.5-19 Under the heading Impact 4.5-1, the second paragraph has been modified as follows:

Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to lessen or avoid <u>additional</u> impacts to site CA-VEN-1571.APMs CUL-5 through CUL-7 would create an environmentally sensitive area (ESA) around site CA-VEN-1571 and require Native American and archaeological monitoring during construction within and in the vicinity of the site. With this mitigation measures and APMs incorporated, impacts to site CA-VEN-1571 would be less than significant.

Project construction could potentially impact site CA-VEN-744. The site was subject to archaeological testing in 2010 and was found to be eligible for the California Register <u>of Historical Resources</u>, and therefore a historical resource under CEQA. Impacts to the site could result from excavation during installation of new TSPs, the movement of heavy machinery and vehicles around the site during construction, and continued use of vehicles around the site along access roads and during future maintenance activities.

Although much of the site will be avoided during project implementation, total avoidance of site CA-VEN-744 would be infeasible. As part of the Proposed Project, an existing TSP within site boundaries would be removed, and a new TSP would be installed within the site boundaries. The new TSP would not be installed within the footprint of the existing TSP because the existing conductor needs to remain suspended on the existing TSP during installation of the new pole. Total avoidance of impacts to site CA-VEN-744 could only be achieved by placing the proposed new TSP outside of site boundaries and thus having the existing conductor span site CA-VEN-744. Due to the existing topography where the archeological site is located, the existing subtransmission facilities, and the dimensions of the site, spanning the site was deemed impractical due to engineering constraints.

However, impacts to the majority of site CA-VEN-744 would be avoided through site capping and avoidance, and residual impacts would be mitigated to a less-thansignificant level. Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to mitigate or avoid direct impacts to site CA-VEN-744. In order to avoid impacts from the use of heavy machinery and vehicles around the site and from the continued use of vehicles along access roads during future maintenance activities, the majority of the site would be permanently capped, as specified in APMs CUL-2 through CUL-4 and Mitigation Measure 4.5-1. These measures would require that SCE permanently cap other portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction and maintenance; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP.

Impacts to those portions of the site where impacts cannot be avoided through capping or avoidance would be mitigated by the implementation of data recovery. The Cultural Resources Treatment and Discovery Plan would include a systematic data recovery plan to be implemented within the footprint where the new TSP would be installed, in order to mitigate impacts to that portion of the site. SCE has also proposed APMs CUL-2 through CUL 4, which would permanently cap other portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP.

4.5-19 *Impact 4.5-1* has been revised starting at the third paragraph to read:

Project construction could potentially impact site CA-VEN-744. The site was subject to archaeological testing in 2010 and was found to be eligible for the California Register <u>of Historical Resources</u>, and therefore a historical resource under CEQA. Impacts to the site could result from excavation during installation of the new TSP, the movement of heavy machinery and vehicles around the site during construction, and continued use of vehicles around the site along access roads and during future maintenance activities.

Although much of the site would be avoided during Project implementation, total avoidance of site CA-VEN-744 would be infeasible. As part of the Proposed Project, an existing TSP within site boundaries would be removed, and a new TSP would be installed within the site boundaries. The new TSP would not be installed within the footprint of the existing TSP because the existing conductor needs to remain suspended on the existing TSP during installation of the new pole. Total avoidance of impacts to site CA-VEN-744 could only be achieved by placing the proposed new TSP outside of site boundaries and thus having the existing conductor span site CA-VEN-744. Due to the existing topography where the archeological site is located, the existing subtransmission facilities, and the dimensions of the site, spanning the site was deemed impractical due to engineering constraints.

However, impacts to the majority of site CA-VEN-744 would be avoided through site capping and avoidance, and residual impacts would be mitigated to a less-than-

significant level. Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to mitigate or avoid direct impacts to site CA-VEN-744. In order to avoid impacts from the use of heavy machinery and vehicles around the site and from the continued use of vehicles along access roads during future maintenance activities, the majority of the site would be permanently capped, as specified in APMs CUL-2 through CUL-4 and Mitigation Measure 4.5-1. These measures would require that SCE permanently cap portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction and maintenance; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP.

Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create an archaeological treatment and discovery plan that would define appropriate actions to mitigate or avoid direct impacts to site CA VEN 744.Impacts to those portions of the site where impacts cannot be avoided through capping or avoidance would be mitigated through data recovery. Mitigation Measure 4.5-1, in conjunction with APM CUL-1, would create a treatment plan for those portions of CA-VEN-744 that cannot be avoided during Proposed Project implementation. The Cultural Resources Treatment and Discovery Plan would include a systematic data recovery plan to be implemented within the footprint where the new TSP would be installed, in order to mitigate impacts to that portion of the site. SCE has also proposed APMs CUL-2 through CUL-4, which would permanently cap other portions of the site that could potentially be indirectly impacted during construction; permanently cap those access roads within site boundaries that would be rehabilitated and used during construction; and construct a permanent earthen pad on which to place the heavy equipment needed to install the new TSP.

4.5-20 The first sentence of **Mitigation Measure 4.5-1** has been revised to read:

Mitigation Measure 4.5-1: A qualified archaeologist shall be retained to serve as lead archaeologist and shall prepare <u>and implement</u> a Cultural Resources Treatment and Discovery Plan prior to issuance of a grading permit.

4.5-20 The following has been added to the end of the second paragraph of **Mitigation Measure** *4.5-1*:

Avoidance shall be the preferred means of avoiding impacts to cultural resources. The Cultural Resources Treatment and Discovery Plan shall set forth detailed procedures for data recovery in the event that resources cannot be avoided.

4.5-23 Under the heading **Impact 4.5-4**, the last sentence of the first paragraph has been changed as follows:

However, with implementation of Mitigation Measure <u>4.5-34.5-4</u>, in conjunction with Mitigation Measures 4.5-1 through 4.5-2b, and APMs CUL-1 through CUL-7, this impact would be reduced to less than significant.

4.5-23 Mitigation Measure 4.5-4 has been revised to read:

Mitigation Measure 4.5-4: If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work <u>in the vicinity of the find</u>, contact the Ventura County Coroner to evaluate the remains, and follow the procedures and protocols set forth in §15064.5 (e)(1) of the CEQA Guidelines. If the County coroner determines that the remains are Native American, SCE shall contact the NAHC, in accordance with Health and Safety Code §7050.5, subdivision (c), and PRC5097.98 (as amended by AB 2641). Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

4.5-24 Under the heading Alternative Subtransmission Alignment 1, the following impact statement has been added following the first paragraph:

Impact 4.5-5: Construction of Alternative Subtransmission Alignment 1 could adversely impact a unique archaeological resource. *Less than significant with mitigation* (Class II)

4.5-24 The last sentence of the second paragraph under the heading Alternative Subtransmission Alignment 1 has been modified as follows:

However, an undeveloped portion of Alternative Subtransmission Alignment 1 has not been subject to archaeological survey due to access restrictions; this segment should be surveyed prior to ground disturbing activities (Mitigation Measure 4.5-5Alt1-1).

4.5-24 Mitigation Measure 4.5-Alt1-1 has been revised to read:

Mitigation Measure 4.5.5<u>Alt1-1</u>: The portion of Alternative Subtransmission Alignment 1 that has not been subject to archaeological survey shall be surveyed prior to any ground-disturbing activities. <u>If significant cultural resources are</u> <u>identified</u>, the procedures described in Mitigation Measure 4.5-2b shall be implemented.

4.5-26 Under the heading Alternative Substation Site B, the following changes have been made to the second paragraph:

With respect to CEQA criterion (b), Alternative Substation Site B has a slightly lower similar sensitivity for archaeological resources thancompared to the

Proposed Project. No cultural resources have been recorded within the vicinity of the Alternative Substation Site B, which is located on an already developed area. However, ground disturbance would be required for the demolition activities necessary to remove the sheriff station infrastructure, in addition to additional grading that may be required outside of already disturbed areas at the site. However, since Since construction of the alternative substation would require ground-disturbing activities, construction related to Alternative Substation Site B could impact buried or otherwise obscured cultural resources.

4.5-27 The third paragraph under the **Alternative Substation Site B** heading has been revised to read:

With respect to CEQA criterion (c), the paleontological setting for Alternative Substation Site B is similar to that of the Proposed Project. As a result, <u>construction</u> impacts to paleontological resources would be similar to those for the Proposed Project. However, implementation of Mitigation Measure 4.5-3 would mitigate <u>construction</u> impacts to paleontological resources to a less-than-significant level (Class II).

4.5-27 The fourth paragraph under the Alternative Substation Site B heading has been changed as follows:

With respect to CEQA criterion (d), the potential to encounter and impact buried human remains for Alternative Substation Site B is would be similar to that of the Proposed Project.

4.5-27 *The following text has been removed:*

System Alternative B

With the implementation of the System Alternative B, no new facilities would be constructed, and all changes would take place on existing facility footprints. Implementation of this alternative would not impact historical resources, unique archaeological resources, Native American resources, or paleontological resources. Therefore, the System Alternative B would have no impact on cultural resources (No Impact).

4.5-27 *The following reference has been added under the heading References – Cultural Resources:*

<u>W&S Consultants, 2003. Site record for CA-VEN-1778, on file at the South</u> <u>Central Coastal Information Center, California State University, Fullerton,</u> <u>1998.</u>

Section 4.6, Geology, Soils, Seismicity, and Mineral Resources

4.6-1 Under the heading, **4.6 Geology, Soils, Seismicity and Mineral Resources,** the last sentence has been revised as follows:

Also described here are the existing conditions in the project area (proposed substation site and transmission subtransmission lines) and the regulations relevant to the Proposed Project.

4.6-1 Under the heading, **Project Area Geology**, the second sentence of the second paragraph has been revised as follows:

These deposits are late Holocene (10,000<u>11,000</u> years ago to present), alluvial materials, comprised of unconsolidated gravel, sand and silt in active or recently active streambeds.

4.6-3 Under the heading, Earthquake Mechanisms and Fault Activity, the last sentence has been revised as follows:

An *active* fault is defined by the State of California as a fault that has had surface displacement within Holocene time (last <u>10,00011,000</u> years).

4.6-13 The following reference has been corrected as follows:

Policy 2.9.2: Structural design of buildings and other structures shall recognize the potential for hydrocompaction subsidence and provide mitigation recommendations for structures that may be affected. (Ventura CountyCounty of Ventura, 2008)

4.6-13 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.6-15 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.6-19 The following changes have been made to the **Impact 4.6-4** discussion:

According to the PEA, this feature was likely a surficial slide associated with friable sandstone of the Sespe Formation (SCE, 2008, citing Webber, 1984). Additionally, the CGS mapped an area of potential earthquake-induced landslides near the subtransmission alignment along Read Road between Sunset Valley Road and Hwy 23. Based on the geology in that area, the landslide <u>potential</u> appears associated with Conejo Volcanics geologic unit. While these areas are mapped as susceptible to earthquake-induced slope failure, it does not necessarily mean that a failure would

occur during a future earthquake. The project specific design-level geotechnical study would evaluate the areas of identified <u>and/or potential</u> slope instability that appear to hinder project construction, operation, or maintenance and provide recommendations for slope stabilization strategies or reinforcement requirements for subtransmission structures, <u>if necessary</u>. Slope stabilization methods could include soil conditioning, re-contouring, or slope material removal and replacement. Slope stability assessment and development of slope reinforcement methods would be an element of the geotechnical evaluation performed by SCE as a preconstruction activity. Given that the areas of potential earthquake-induced landslides would be reviewedevaluated during the design level geotechnical study and stabilized <u>(if necessary)</u> prior to construction, this impact would be less than significant.

4.6-19 The following reference has been changed in the **Impact 4.6-5** discussion:

Because both the Cibo Clay (CmE) and Calleguas-Arnold complex (CbF2) soil series are well drained (US Department of Agriculture, 2009) and the Proposed Presidential Substation site is on sloping ground, accelerated erosion is considered an issue under normal conditions. Soil survey data indicates the hazard of soil loss from non-surfaced roads and trails for both soil series is moderate to slight (USDA, 2011).

4.6-22 Under the heading, Alternative Subtransmission Alignment 1, the third sentence of the first paragraph has been revised as follows:

Based on recommendations of the geotechnical engineer or engineering geologist, either the slope would may require stabilization or structural reinforcement requirements would may be necessary for the subtransmission facilities.

4.6-23 Under the heading, Alternative Subtransmission Alignment 2, the following sentence has been revised as follows:

The need for seven pull and tension sites may require additional grading<u>however</u>, as no new or improved access roads are necessary, there would be a lesser need for geotechnical support structures such as retaining walls and engineered fill, and modification of access roads east of Hwy 23 could also be necessary.

4.6-23 Under the heading, Alternative Substation Site B, the first sentence of the first paragraph has been revised as follows:

While the proposed Presidential Substation site is located in an area susceptible to earthquake-induced landslides and would require considerable fills, Alternative Substation Site B is not in an area mapped as a landslide hazard area and would<u>may</u> require more excavation and hillside cut slopes.

4.6-23 Under the heading, Alternative Substation Site B, the following sentences have been revised as follows:

Overall, the level of geotechnical analysis and the number of potential issues at the proposed Presidential Substation site compared to the Alternative Substation Site B are of equal similar magnitude. The geotechnical limitations at the Alternative Substation Site B would not represent significant environmental issues and because it is not in an earthquake hazard zone for landslides, could have fewer impacts. Nevertheless, impacts associated with this alternative site would be less than significant (Class III).

4.6-24 *The following heading and text have been removed:*

System Alternative B

The System Alternative B (i.e., upgrade the existing substations with non-standard equipment) would not require geotechnical and seismic considerations because a new site would not be developed. However, some geotechnical work may be required to determine whether the existing foundation soils and pads can adequately support increased the weight of new equipment. Certain structural considerations may be required to determine the support needed to reduce the potential for toppling during a seismic event. No slope stability analysis or additional slope grading would be required and it is possible that geotechnical data developed when the original site was developed could be adequate for design of improvements under the System Alternative B. No significant impacts are anticipated in regards to this alternative.

4.6-25 *The following references have been added under the heading References – Geology and Soils:*

ESRI, 2009. ESRI Data and Maps, http://www.esri.com/data/data-maps

SCE, 2010. Project Related GIS data

- <u>USGS and CGS, 2009.</u> Quaternary fault and fold database for the United States, <u>http://earthquakes.usgs.gov/regional/qfaults/</u>
- Webber, F.H., Jr., 1984. Geology of the Calabasas-Agoura-Eastern Thousand Oaks Area, Los Angeles and Ventura Counties, California; California Division of Mines and Geology, Open File Report 8401 LA.

Section 4.7, Greenhouse Gas Emissions

4.7-6 *The first two paragraphs under* **Impact 4.7-1** *have been revised to read:*

As part of the permit application process for the Proposed Project During the public review period for the Draft EIR, SCE provided revised GHG construction emission estimates for various construction activities that would be associated with the Proposed Project. Exhaust emissions in the form of CO₂ were estimated using emission factors from CARB's EMFAC2007 and Offroad2007 emissions models

(see Appendix C DEIR Comment SCE-31 for details associated with the Proposed Project construction emission estimates). SCE's CO_{2e} construction emissions estimate for the Proposed Project is 9281,462 metric tons.

It should be noted that SCE's estimated emissions did not include those that would be associated with the proposed underground subtransmission alignment installation activities related to the Hwy 23 crossing or the installation of the underground distribution line and telecommunications cable. Based on the overall equipment hours that would be required to complete these activities (see Project Description Table 2-5), it is estimated that total Proposed Project construction emissions would be approximately 25 to 30 percent higher than SCE's estimate. In addition, SCE's emissions estimate includes only CO2 emissions. Construction equipment and vehicles would also generate other GHGs, including CH₄ and N₂O. However, using methods identified by the California Climate Action Registry (CCAR, 2009), the CO₂e emissions that would account for CH₄ and N₂O would represent a less than one percent increase compared to the estimate of only CO₂ emissions. For a conservative analysis, it is assumed that the total CO₂e emissions that would be associated with construction of the Proposed Project would be approximately 30 percent higher than the CO₂ emissions estimate provided by SCE (to account for the non-CO₂ GHGs as well as the undergrounding activities not included in SCE's emission estimates). Therefore, it is estimated that total construction emissions that would be associated with the Proposed Project would be approximately 1,206 metric tons CO₂e.

4.7-7 *The following revisions have been made to the last paragraph of the* **Impact 4.7-1** *discussion:*

As indicated above, total GHG construction emissions in the form of CO₂e would be approximately $\frac{1,2061,462}{1,462}$ metric tons. These emissions amortized over a 30year period equal approximately $\frac{4049}{40}$ metric tons per year. Adding $\frac{4049}{40}$ metric tons CO₂e to the operational emissions of 18 metric tons CO₂e per year gives the total Proposed Project annual GHG emissions of approximately $\frac{5867}{2}$ metric tons CO₂e per year, which would be substantially less than the SCAQMD's significance threshold of 10,000 metric tons CO₂e per year for stationary sources.

4.7-8 The following revisions have been made to the second paragraph of the **Impact 4.7-2** discussion:

The requirements would apply to California and out-of-state registered trucks that travel to California. This measure would require in use trucks and trailers to comply through a phase in schedule starting in 2010 and achieve 100 percent compliance by 2014. Construction of the Proposed Project and the associated use of heavy-duty vehicles for hauling would be expected to be complete by approximately June 2012, which would be prior to the scheduled 100 percent compliance of the recommended measure. Therefore, the potential for the Proposed Project to conflict with

compliance of this recommended action would be negligible. This measure requires fleet owners of in-use trucks and trailers to comply through a phase-in schedule starting in 2010 and achieve 100 percent compliance by 2014. Heavy-duty vehicles used for hauling during construction of the Proposed Project would be required to be compliant with the regulations associated with Scoping Plan Measure T-7; therefore, the potential for the Proposed Project to conflict with compliance of this recommended action would be negligible and associated impacts would be less than significant.

4.7-8 The following revisions have been made to the third paragraph of the **Impact 4.7-2** discussion:

Scoping Plan Measure H-6: High Global Warming Potential Gas Reductions from Stationary Sources – SF₆ Leak Reduction and Recycling in Electrical Applications. This measure will reduce emissions of SF₆ within the electric utility sector and at particle accelerators by requiring the use of best achievable control technology for the detection and repair of leaks and the recycling of SF_6 . On February 9, 2011, the State of California Office of Administrative Law (OAL) approved nine of the ten proposed sections for the SF_{6} regulation. The approved regulations establish maximum annual SF₆ emission rates for gas insulated switchgear, starting in 2012 at 10 percent of the owners' total equipment capacity averaged over 2011. On June 17, 2011, the approved Final Regulation Order associated with Scoping Plan Measure H-6 for reducing SF_6 emissions from gas insulated switchgear became effective. The regulation establishes maximum annual SF₆ emission rates for gas insulated switchgear, starting in 2011 at 10 percent of the owners' total equipment capacity. The emission rates will steadily decline by 1 percent per year until 2020, at which time the maximum annual SF_6 emission rate would be set at 1 percent. The OAL disapproved proposed regulation §95356 because it failed to meet the clarity standard pursuant to Government Code §11349.1. The primary component of §95356 of the proposed regulation would require gas insulated switchgear owners to annually report their SF₆ emissions and emission rate to CARB. The regulation also requires gas insulated switchgear owners to annually report their SF_6 emissions and emissions rate to CARB (CARB, 2011).

4.7-8 Under the heading, **Impact 4.7-2**, the first sentence of the fourth paragraph has been removed:

Utilities and other affected entities would comply by using leak detection and repair (LDAR) abatement equipment to reduce system leakage. The proposed performance standard would mandate and enhance current voluntary federal SF_6 recycling standards. The proposed Presidential Substation would include installation of a new circuit breaker that would contain SF_6 . Pursuant to Mitigation Measure 4.7-1 (see below), SCE would be required to install a circuit breaker with

low SF_6 leak rates and monitor the SF_6 -containing circuit breaker consistent with the intent of Scoping Plan Measure H-6.

4.7-9 *Mitigation Measure* **4.7-2** *have been revised to read:*

Mitigation Measure 4.7-2: SCE shall ensure that the circuit breakers installed at the proposed Presidential Substation have a guaranteed SF_6 annual leak rate of no more than 0.5 percent by volume. SCE shall provide CPUC with documentation of compliance, such as specification sheets, prior to installation of the circuit breakers. In addition, SCE shall annually monitor the SF_6 -containing circuit breakers at the proposed Presidential Substation for the detection and repair of leaks. SCE shall annually report its Presidential Substation related SF_6 emissions to the CPUC until a regulation is approved by the State of California Office of Administrative Law that approves a regulation requiring annual reporting of SF_6 emissions to the CARB.

4.7-9 Under the heading, Alternative Subtransmission Alignment 1, the text has been revised as follows:

Although this alternative would include approximately 0.8 mile longer length of subtransmission alignment from the Moorpark-Royal No. 2 line, compared to the proposed subtransmission alignment along Sunset Valley Road, it would not require existing distribution to be relocated underground. Total The subtransmission would be constructed underground at the Hwy 23 crossing and would require new underground conduit and structures and the 16 kV and telecommunication lines would be underground at the intersections of Moorpark Road and Read Road as well as Esperance Road and Tierra Rejada Road to make clearance for the new 66 kV line segment. Overall, total emissions, including those associated with construction, operation, and maintenance, would continue to be less than significant.

4.7-9 Under the heading, Alternative Subtransmission Alignment 2, the text has been revised as follows:

Although this alternative would include approximately 1.0 mile longer length of the alternative subtransmission alignments compared to the lengths of the proposed subtransmission alignments <u>and would require a telecommunication line and</u> <u>modification of access roads east of Hwy 23</u>, it would not require existing distribution to be relocated underground.

4.7-9 Under the heading, Alternative Subtransmission Alignment 3, the following paragraph has been to the beginning of the analysis:

Under this alternative, additional groundwork would be required compared to the Proposed Project. For the portion of the alignment that will be undergrounded (from the intersection of Read Rd. and Sunset Valley Rd. east), a large flat pad to accommodate construction vehicles would be constructed as well as turnaround areas, crane pad areas for installing the vault and the construction of access roads meeting current SCE standards for both construction and maintenance operations. Widening of access roads identified for pole removal and installation would not be required under this alternative as the 16 kV poles would remain in place and would accommodate the telecommunication line, as described above. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

4.7-10 Under the heading, Alternative Substation Site B, the first paragraph has been revised as follows:

Although the development at the Alternative Substation Site B would require complete demolition of all existing structures associated with the previous Ventura County Sherriff's Department buildings and infrastructure <u>and the construction of</u> <u>an approximately 16 foot high retaining wall</u>, this site would require considerably less cut and fill construction activities compared to those that would be required for the proposed Presidential Substation.

4.7-10 *The following heading and text have been removed:*

System Alternative B

Under the System Alternative B, short-term construction activities would result in substantially less GHG emissions compared to the construction emissions that would result for the Proposed Project. Construction activities under System Alternative B would primarily be associated with replacing the existing transformers at Royal, Thousand Oaks, and Potrero substations with new transformers. There could also be a need to replace and/or add some distribution equipment at the substations. It is anticipated that total GHG emissions under System Alternative B would be similar to the total emissions estimated for the Proposed Project associated with Substation civil work (see Appendix C Tables 1 and 2). Total GHG emissions under this alternative are estimated to be approximately 60 metric tons, which would be approximately seven percent of the total GHG emissions estimated for the Proposed Project. Total GHG emissions, including those associated with construction, operation, and maintenance, would be less than significant.

4.7-11 The following references have been added or removed under the heading References-Greenhouse Gas Emissions:

> California Climate Action Registry (CCAR), 2009. General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1, January 2009. Tables C.4 and C.7.

CARB, 2011. Final Regulation Order to Adopt new Subarticle 3.1, Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear sections 95350 to 95359, title 17, California Code of Regulations. Available at: http://www.arb.ca.gov/cc/sf6elec/sf6elec.htm. Accessed October 6, 2011.

<u>USEPA, 2006. SF6 Leak Rates from High Voltage Circuit Breakers – U.S. EPA</u> <u>Investigates Potential Greenhouse Gas Emissions Source. IEEE Power</u> <u>Engineering Society General Meeting, Montreal, Quebec, Canada, June 2006.</u> <u>Available at: http://www.epa.gov/electricpower-</u> <u>sf6/documents/leakrates_circuitbreakers.pdf.</u>

Section 4.8, Hazards and Hazardous Materials

4.8-2 Reference to System Alternative B has been removed from the heading Alternative Substation Site B, Alternative Subtransmission Alignments, and System Alternative B and from the first paragraph following that heading:

Alternative Substation Site B, and Alternative Subtransmission Alignments, and System Alternative B

Chapter 3, Alternatives and Cumulative Projects, and Figure 3-2, Project Alternatives Map, describe and depict the locations for Alternative Substation Site B and the alternative subtransmission alignments. This section evaluates the alternative subtransmission alignments, and Alternative Substation Site B, and the System Alternative B; however, because CEQA does not require an equal level of detail for project alternatives, this analysis was not included in the Phase 1 Environmental Site Assessment Report. The types of bulk hazardous materials currently stored and/or used in the vicinity of the alternatives would most likely be petroleum hydrocarbons found in underground storage tanks, such as those previously located at the Sherriff's station and water district; or in aboveground storage tanks, such as those typically located at farm or ranch operation centers. While the Phase 1 Environmental Site Assessment Report (SCE, 2008) may have included portions of the proposed alternatives within the radius search for the Proposed Presidential Substation Project, ESA conducted a regulatory database search of the SWRCB's GeoTracker and the California Department of Toxic Substances Control's EnvironStor websites for each of the proposed alternatives. Review of the GeoTracker database did not reveal any hazardous material sites at Alternative Subtransmission Alignment 1, Alternative Subtransmission Alignment 2, Alternative Subtransmission Alignment 3, or Alternative Substation Site B, or the System Alternative B.

4.8-4 *The first two paragraphs after Table 4.8-2 have been removed:*

For the System Alternative B, the Potrero Substation site is located approximately 800 feet southwest of an open LUST site (RB-Case #: C03006); however, this case has already undergone remediation, and the case is open for monitoring purposes. The potential contaminants of concern were hydrocarbons detected in groundwater (SWRCB, 2011).

For the System Alternative B, the Thousand Oaks Substation Site is located approximately 800 feet east of a LUST site (RB Case #: 88042); however, this case has already undergone remediation, and is open for monitoring purposes. This substation site is also located approximately 1,000 feet northeast of two additional LUST sites that are currently undergoing remediation (RB Case #: 89093 and RB Case # 92022) (SWRCB, 2011).

4.8-4 *The third paragraph after Table 4.8-2 has been changed as follows:*

A review of the EnviroStor database did not reveal any hazardous sites at Alternative Subtransmission Alignment 1, Alternative Subtransmission Alignment 2, Alternative Subtransmission Alignment 3, <u>or</u> Substation Site B, or at any of the System <u>Alternative substations</u> (California Department of Toxic Substances Control, 2011).

4.8-4 The last paragraph after **Table 4.8-2** has been changed as follows:

Alternative Substation Site B is a 2.35.29-acre parcel north of Madera Road that previously housed the Ventura County Sheriff's Department.

4.8-5 The first sentence of the paragraph under the heading **Wood Treatment Products** has been revised as follows:

More than 90<u>Approximately 89</u> existing subtransmission and 16kV distribution wood poles would be removed from the proposed subtransmission alignments.

4.8-5 *Reference to System Alternative B has been removed from the second paragraph under the heading Schools and Daycare Facilities*:

Madera Elementary School is located in City of Simi Valley, approximately 500 feet from the Alternative Subtransmission Alignment 2 (MUSD, 2009). The System Alternative B includes upgrades to the existing Thousand Oaks Substation, which is located approximately 500 feet from both Pine School and Head Start Child Development Resources in Thousand Oaks.

 4.8-12 System Alternative B has been removed from the heading City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2, and 3; System Alternative B) as follows:

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.8-12 System Alternative B has been removed from the heading City of Simi Valley General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2, and 3; System Alternative B) as follows:

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

- **4.8-17** The first bullet under **Mitigation Measure 4.8-1b**, the following replacement has been made:
 - *Hazardous Materials and Hazardous Waste Handling*: A project operationsspecific hazardous materials management and hazardous waste management program shall be developed prior to <u>operationsconstruction</u> of proposed Presidential Substation project.
- **4.8-18** The third bullet under **Mitigation Measure 4.8-1b**, has been revised as follows:
 - *Emergency Release Response Procedures:* An Operations Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to Substation operational construction activities.
- **4.8-21** The following modifications have been made to the first sentence under Impact 4.8-5:

Several private and public Public roadways, including Sunset Valley Road, Moorpark Road, and Madera Road, that as well as several private roadways would be crossed by the Proposed Presidential Substation project would likely need to be temporarily closed during subtransmission line stringing activities.

4.8-24 The first sentence under the heading Alternative Subtransmission Alignment 2 has been modified to read:

Unlike the proposed subtransmission alignment, Alternative Subtransmission Alignment 2 is entirely adjacent to existing roadways, but this alternative subtransmission alignment has a similar geographic setting to the proposed subtransmission alignment.

4.8-24 Under the heading Alternative Subtransmission Alignment 3, the following revisions have been incorporated:

Alternative Subtransmission Alignment 3 is in a very similar location to along the <u>same route as the proposed</u> subtransmission alignment, <u>except</u>; however, the <u>underground portion of</u> Alignment 3 does not follow includes undergrounding the <u>subtransmission line along a portion of</u> Read Road. Construction and operation impacts associated with this alternative would be similar to the Proposed Project. However, no pole replacement or <u>construction pole installation</u> would be required between the intersection of Sunset Valley Road and Read Road and the proposed Presidential Substation project.

4.8-25 The discussion of System Alternative B has been removed as follows:

System Alternative B

The System Alternative B would not require the construction of a new substation and associated subtransmission lines. Installing larger transformers could require the replacement of some existing distribution equipment located inside and outside of the substation footprint. Additional 16 kV circuits may be required at some locations or existing 16 kV get-away equipment may need to be upgraded. Construction and operation of this equipment would not result in hazard impacts. Because the footprint of the System Alternative B is less than the Proposed Project and contains existing infrastructure, construction and operational impacts would be less than the Proposed Project. The two existing LUST sites currently undergoing remediation would not affect construction and operation of this alternative because this alternative would not require grading or subsurface construction, and because this alternative is not located directly adjunct to either of these open cases.

4.8-26 The Environmental FirstSearch reference has been corrected as follows:

Environmental FirstSearch, 2008. Environmental FirstSearch Report Prepared for Southern California Edison, April 10, 2008. Proponent's Environmental Assessment, Appendix <u>H-F</u>.

4.8-25 The following reference has been removed under the heading References- Hazards and Hazardous Materials:

State Water Resources Control Board. 2011, GeoTracker, Available: https://geotracker.waterboards.ca.gov/. Accessed June 27, 2011.

Section 4.9, Hydrology and Water Quality

4.9-12 The following heading and text have been amended as follows:

Construction General Permit (SWRCB Order 2009-09-DWQ (as amended by 2010-0014-DWQ)). For storm water discharges associated with construction activity in the state of California, the SWRCB has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (SWRCB Order 2009-0009-DWQ (as amended by 2010-0014-DWQ); Construction General Permit) in order to avoid and minimize water quality impacts attributable to such activities.

4.9-13 Under the heading, **Construction General Permit**, the second sentence of the second paragraph has been revised as follows:

Dischargers are required to submit a Notice of Intent (NOI) <u>Permit Registration</u> <u>Documents (PRDs) via the SWRCB's online database</u> in order to, at the discretion of the SWRCB and the LARWQCB, obtain coverage under the Construction General Permit.

4.9-13 Under the heading, **Construction General Permit**, the third sentence of the third paragraph has been revised as follows:

The permit contains several compliance items that may apply to a project depending on that site's characteristics (some of which may not be applicable depending on project site characteristics), including:

4.9-13 Under the heading, Construction General Permit, the second sentence of the fourth paragraph has been amended as follows:

SCE would submit an NOI<u>PRDs</u> to the SWRCB and obtain coverage under, and comply with, the General Construction Permit.

4.9-16 Under the heading, **Ventura County Watershed Protection District (Proposed Project and Alternative Subtransmission Alignments 1 and 3)**, the first paragraph has been amended as follows:

> The authority of the VCWPD over its jurisdictionjurisdictional channels is established through a number of ordinances and policies. The primary ordinance established establishing the VCWPD's authority and requirements to obtain permits for encroachments in related to jurisdictional waters and right-of-ways is Ventura County Ordinance FC-18No. WP-1 (which has been consolidated from earlier ordinances focused on flood control and watershed protection) (VCWPD, 2010). Ordinance FC-18 relates to protection and regulation of flood control facilities and watercourses. This ordinance has been amended by FC-19 through FC-23 and FC-27 (VCWPD, 1981). The ordinance prohibits the construction or placement of any structure in, upon or across a watercourse without a permit. The Proposed Project and Alternative Subtransmission Alignment 3 would cross Arroyo Santa Rosa, a VCWPD jurisdictional channel, and would subsequently require a watercourse permit from the District. In either instance, SCE would contact and acquire the necessary permits from the VCWPD.

4.9-17 *The following heading is corrected as follows:*

City of Thousand Oaks Municipal Code (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.9-17 The following heading is corrected as follows:

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.9-18 The following heading is corrected as follows:

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.9-21 The following changes have been made to the third paragraph of **Impact 4.9-1** discussion:
SCE would be required to submit an <u>NOIPRDs</u> to the SWRCB in order to obtain approval to carry-out construction activities under the General Construction Permit.

4.9-22 The following bullet point has been added after the first bullet point in **Mitigation** *Measure 4.9-1*:

• <u>In-board ditches may be used to control/convey water seepage from cut</u> <u>slopes. If used, in-board ditches shall be lined with rock rip-rap and (the</u> <u>slope shall not exceed 6 percent);</u>

4.9-23 The following changes have been made to **Impact 4.9-2** discussion:

The proposed excavations (up to 60 feet) could encounter groundwater in select locations, in which case dewatering would-may be necessary. As discussed above, groundwater within the project area could be as shallow as 15 to 35 feet bgs. Where the groundwater table is relatively shallow, some groundwater seepage may occur into pole excavation or auger holes requiring dewatering on a one time basis immediately prior to pole placement and installation which may require dewatering. As an alternative method to dewatering, the hole may be stabilized with a drilling mud slurry. Concrete for the pole foundation would then be pumped to the bottom of the hole displacing the mud slurry. The mud slurry would be recovered (e.g., in a baker tank or vacuum truck) and either be reused or discarded at an off-site facility in accordance with all applicable laws.

4.9-23 The following changes have been made to the second paragraph under **Impact 4.9-2**:

For the Proposed Project, if dewatering is required for pole placementemployed, it would be accomplished <u>be-by</u> setting well points around the work area which are tied to <u>a</u> manifold and pump. The water would then be discharged to a sediment tank and, after adequate residence time for settling of sediments and other solids, subsequently discharged into the local storm drain or sewer system <u>in a manner</u> <u>consistent with any applicable permits and regulations</u>. However, as described above, locally high concentrations of TDS and nitrate within groundwater are likely within the project area.

4.9-23 The following changes have been made to the third paragraph of **Impact 4.9-2** discussion:

Concerning such activities, SCE shall apply <u>for</u> and comply with the provisions of SWRCB Order 2003-0003-DWQ including a dewatering permit (e.g., SWRCB Order 2003-0003-DWQ or LARWQCB Order R4-2008-0032), as well as develop and submit a discharge monitoring plan (<u>if necessary</u>).

4.9-24 The following bullet point has been amended in *Mitigation Measure 4.9-2*:

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- If discharging to a community sewer system is feasible or necessary, SCE shall discharge to a community sewer system that flows to a wastewater treatment plant.
- **4.9-25** The following changes have been made to the last sentence of the second paragraph of *Impact 4.9-3* discussion:

Construction activities for the proposed Presidential Substation would result in a disturbed area of approximately 2.3 2.5 acres (see Chapter 2, *Project Description*, Figure 2-7), and the various elements associated with the proposed Presidential Substation (e.g., foundation, driveways, perimeter wall, etc.) would result in approximately 16,000 square feet of new, impervious surface at the site (see Chapter 2, *Project Description*, Table 2-5).

4.9-25 Under the heading **Impact 4.9-3**, the following changes have been made to the first sentence of the third paragraph:

The Ventura County MS4 Permit comprises two general categories,: storm water quality control measures and hydromodification control measures.

4.9-26 Under the heading **Impact 4.9-3**, the following changes have been made to the fourth paragraph:

The total project area for the proposed Substation site is approximately 4 acres 5.4 acres (all pervious surface), and the total area of impervious surface that would be created as part of the Proposed Project is approximately 16,000 square feet (or 0.37 acre). The 5 percent EIA allowance for the proposed Presidential Substation site would equate to $0.20 \ 0.27$ acre, leaving approximately $0.17 \ 0.10$ acre in excess of the allowance. Guidance for selection and implementation of retention BMPs, biofiltration BMPs, and treatment control measures can be found in the Ventura County TGM (2010).

4.9-26 Under the heading **Impact 4.9-3**, the first sentence of the fifth paragraph has been amended a follows:

In accordance with the requirements outlined in the Ventura County MS4 Permit and the Ventura County TGM (2010), SCE must implement a retention BMP with a design volume of approximately $0.01 \ 0.006$ acre-feet and a treatment control measure with a design volume of approximately $0.05 \ 0.056$ acre-feet.

4.9-26 The first bullet point has been amended in **Mitigation Measure 4.9-3**:

• SCE shall implement a Retention BMP(s) (as defined in the Ventura County TGM [2010]) with a design volume of approximately 0.01 0.006 acre-feet. The drainage area to this feature shall comprise at least 0.17 acre0.10 acres of the proposed impervious surface area.

4.9-27 The second bullet point has been amended in **Mitigation Measure 4.9-3**:

- SCE shall implement a Treatment Control BMP(s) (as defined in the Ventura County TGM [2010]) with a design volume of approximately 0.050.056 acre-feet. The drainage area to this feature shall comprise at least the remaining 3.835.3 acres of the proposed Presidential Substation site (i.e., the residual drainage area not captured by the Retention BMP(s)).
- **4.9-27** Under the heading, Alternative Subtransmission Alignment 1, the first sentence of the second paragraph has been amended as follows:

The second subtransmission line for this alternative (i.e., from the Moorpark-Royal No. 2 to the Substation), which may require a new access road, would traverse land that is generally less developed and which is characterized by more variable and relatively steeper topography as compared to the proposed subtransmission alignment.

4.9-28 The following text under the heading Alternative Subtransmission Alignment 2 has been edited:

However, some differences in the extent of the potential impacts should be noted. No new access roads would be installed or improved as part of construction or operation of Alternative Subtransmission Alignment 2. Therefore, the potential erosion and sedimentation risks related to road installation or improvement would likely be eliminated, and the implementation of Mitigation Measure 4.9-1 would not be necessary. However, land-clearing and grading activities associated with Alternative Subtransmission Alignment 2 may disturb a larger gross area due to the need for approximately seven additional pull and tension sites as compared to the proposed subtransmission alignment. Implementation of Alternative Subtransmission Alignment 2 would not likely warrant additional or different mitigation measures than those required for the proposed subtransmission alignment.

4.9-28 Under the heading, Alternative Subtransmission Alignment 2, the third paragraph has been amended as follows:

Therefore, Mitigation Measures <u>4.9-1</u>, 4.9-2 and 4.9-3 would also <u>likely</u> be required for Alternative subtransmission Alignment 2 and the potential impacts of this alternative to hydrologic resources and water quality would be less than significant (Class II).

4.9-28 The last sentence in the first paragraph under Alternative Subtransmission Alignment 3 has been removed:

However, some differences in the extent of the potential impacts should be noted.

4.9-28 Under the heading Alternative Subtransmission Alignment 3, the second paragraph has been edited:

No new access roads would be installed-or improved as part of construction or operation of Alternative Subtransmission Alignment 3, although some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment. Therefore, the potential erosion and sedimentation risks related to road installation would be eliminated, and impacts from road improvement would likely be less than under the Proposed Project. or improvement would likely be eliminated, and the implementation of Mitigation Measure 4.9-1 would not be necessary.

Implementation of Alternative Subtransmission Alignment 3 would not likely warrant additional or different mitigation measures than those required for the proposed subtransmission alignment. Therefore, Mitigation Measures <u>4.9-1</u>, 4.9-2 and 4.9-3 would also <u>likely</u> be required for Alternative Subtransmission Alignment 3 and the potential impacts of this alternative to hydrologic resources and water quality would be less than significant (Class II).

4.9-28 The following changes have been made to the last sentence of the third paragraph under *Alternative Subtransmission Alignment 3*:

Therefore, Mitigation Measures <u>4.9-1</u>, 4.9-2 and 4.9-3 would also <u>likely</u> be required for Alternative Subtransmission Alignment 3 and the potential impacts of this alternative to hydrologic resources and water quality would be less than significant (Class II).

4.9-29 The heading and text under the heading System Alternative B has been removed:

System Alternative B

System Alternative B (i.e., upgrade the existing substations with non-standard equipment) has a similar hydrology and water quality setting as the Proposed Project, yet System Alternative B would be much smaller in scope as compared to the Proposed Project. Potential construction and operational impacts related to storm water runoff and water quality for System Alternative B would be controlled by existing regulatory requirements, including the Construction General Permit and relevant WDRs. Therefore, there would be no impacts related to hydrology and water quality (No Impact).

4.9-30 The following reference has been revised under the heading **References – Hydrology and** *Water Quality:*

> Ventura County Watershed Protection District (VCWPD), Ventura County Flood Control District 2010. Watershed Protection Ordinance No. FC-18, amended

by FC-19 through FC-23 and FC-27, 1981<u>WP-1</u>, enacted January 12, 2010, http://portal.countyofventura.org/portal/page/portal/PUBLIC_WORKS/Wate rshed_Protection_District.

Section 4.10, Land Use and Planning

4.10-1 Under the heading **Proposed Presidential Substation**, the first paragraph has been amended a follows:

The 4-acre Substation footprint would be built on presently undeveloped land that is included in the Wood Ranch Specific Plan area (see *Regulatory Context*, below, for further description of this Plan). A privately owned avocado orchard surrounds the parcel to the south and east, with Lake Bard Water Filtration Plant farther south, and a former sheriff's station (now abandoned) on the hill across the street to the northeast. The land to the north and west of the site is open space. The land use pattern in the adjacent area of the City of Simi Valley, southwest of the site, includes a mix of open space, residential, public facilities, commercial, and agriculture uses.

4.10-1 Under the heading **Proposed Subtransmission Alignment**, the first paragraph has been revised as follows:

The proposed subtransmission alignment would be located predominantly within <u>road</u> ROW currently being used for 16 kV distribution¹. The proposed subtransmission alignment would originate at the Moorpark-Thousand Oaks No. 2 66 kV subtransmission line near the intersection of Read Road and Moorpark Road in unincorporated Ventura County. The proposed subtransmission alignment would extend east along the south side of Read Road within the City of Thousand Oaks, cross underneath Hwy 23, and continue east to the <u>terminate terminus</u> at the proposed Presidential Substation site.

4.10-1 Footnote 1 has been revised as follows:

While some <u>Some</u> areas along Sunset Valley Road and Read Road could require additional overhang easement rights to accommodate pole cross-arms, the Proposed Project would not require additional ground surface ROW <u>and may require additional easement rights depending on the final engineering</u>.

4.10-2 Under the heading **Proposed Subtransmission Alignment**, the last sentences of the second paragraph has been amended as follows:

Along Sunset Valley Road, the proposed subtransmission alignment would <u>eross be</u> <u>adjacent to</u> lands that are being used for agriculture, open space, and rural residential development.

4.10-3 Under the heading Alternative Substation Site B, the first paragraph has been amended as follows:

The parcel is owned by the City of Simi Valley and previously housed the Ventura County Sheriff's Department. <u>Surrounding land uses include commercial and</u> agricultural to the south, and open space to the north, west, and east.

4.10-3 *The following text has been removed:*

System Alternative B

This alternative would consist of upgrading three existing SCE substations: Royal Substation in the City of Simi Valley, Thousand Oaks Substation in the City of Thousand Oaks, and Potrero Substation in the City of Thousand Oaks. All work would occur on land currently being used for utility purposes. No additional land or ROW acquisitions would be required under this alternative.

4.10-6 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.10-7 The following heading is corrected as follows:

City of Thousand Oaks Municipal Code: Zoning Regulations Chapter (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.10-8 The following heading is corrected as follows:

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.10-10 The sentence at the top of page 4.10-10 is corrected as follows:

The following goals and policies identified in the City of Simi Valley General Plan govern in the area proposed for development of Alternative Subtransmission Alignment 2, Alternative Substation Site B, and the System Alternative B:

4.10-10 *The following heading is corrected as follows:*

City of Simi Valley Municipal Code: Zoning Districts (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.10-11 *The following text has been added to the beginning of paragraph, pertaining to conditional use permits:*

A<u>According to the City of Simi Valley Municipal Code, a</u> conditional use permit is required for public utility facilities as well as pipelines, transmission lines, and aboveground facilities in the Open Space, Residential – Low Density, Residential – Moderate Density, Residential – High Density, and Residential – Very High Density zoning designations.

4.10-13 Under the heading *a*); *Proposed Presidential Substation*, the first sentence of the second paragraph has been amended a follows:

The proposed approximately 4-acre Substation footprint could not physically divide the City of Simi Valley because it would not be constructed or operated within this city.

4.10-13 Under the heading *a*); *Proposed Subtransmission Alignment*, the paragraph has been amended a follows:

Proposed Subtransmission Alignment. The proposed subtransmission alignment would not have an impact related to the physical division of an established community. The alignment would be located <u>primarily</u> within the existing <u>road</u> ROW currently being used for 16 kV distribution within the City of Thousand Oaks. Some areas along Sunset Valley Road and Read Road (in unincorporated Ventura County) could require additional overhang easement rights to accommodate pole cross-arms, and could require additional ground surface ROW. Regardless, because the proposed subtransmission alignment would be located predominantly within an existing <u>road</u> ROW in a largely low density rural residential area, and because a subtransmission line would not restrict access or constitute a physical barrier to an established community, the proposed subtransmission alignment would have no impact related to the physical division of an established community (No Impact).

4.10-14 Under the heading **b**), the second sentence of the third paragraph has been amended a follows:

The proposed subtransmission alignment would be located in an established utility corridor primarily within road ROW with existing utility facilities in which an existing 16 kvkV distribution line is currently located.

4.10-15 Under the heading **b**), the paragraph has been amended a follows:

<u>Although As discussed above</u>, General Order No. 131-D gives the CPUC sole and exclusive jurisdiction over the siting and design of the Proposed Project, if and therefore the following information is provided for informational purposes only. If the City of Thousand Oaks Zoning Ordinance applied to the Proposed Project, a conflict with the Protected Ridgeline Overlay Zone would result:

4.10-15 Under the heading b); 1) City of Thousand Oaks Zoning Ordinance: Protected Ridgeline Overlay Zone, the third paragraph is revised as follows:

The proposed Presidential Substation site and several of the parcels that would be traversed by the proposed subtransmission alignment would also be subject towithin the Protected Ridgeline Overlay Zone (PR) set forth in Article 35 of the City's Zoning Ordinance. Certain development standards apply within 300 feet horizontally or 100 feet vertically of the crest of a protected ridgeline; however, these standards can be modified with an approved request for a Special Use Permit. The significance of adverse impacts on the scenic vistas and natural features intended to be protected by the *PR* zoning designation would be considered by the City in evaluating such a request. As and are further analyzed in Section 4.1, Aesthetics, Impact 4.1-8 concludes that the Proposed Project would cause a significant impact on visual resources by substantially degrading the existing visual character or quality of the proposed Presidential Substation site and its surroundings from public views. Even with the implementation of recommended mitigation measures, the impact would remain significant and unavoidable. Consequently, construction, operation and maintenance of the Substation would conflict with the City of Thousand Oaks's Protected Ridgeline Overlay Zone.

4.10-16 Under the heading Alternative Subtransmission Alignment 1, the first paragraph has been amended a follows:

Construction, operation and maintenance activities associated with Alternative Subtransmission Alignment 1 would be the same as similar to the Proposed Project. The first source line would follow the same alignment as the Proposed Project. The second source line would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Tierra Rejada Road and Esperance Road. It would extend due south parallel to Esperance Road and turn east approximately 0.5 mile south of Tierra Rejada Road and then southeast where the alignment leaves Esperance Road. For 1.8 miles, the alignment would cross generally overland requiring new ROW up to 25 feet wide as well as additional land rights for access that may not follow the subtransmission line. Land use in the vicinity of this alignment is a mix of open space and rural residential with existing utility lines for a portion of the alignment for the second source line. Alternative Subtransmission Alignment 1 would not physically divide any established communities (No Impact). Also like the Proposed Project, there are no HCPs or other approved governmental habitat plans that involve lands traversed by Alternative Subtransmission Alignment 1 (No Impact).

4.10-16 Under the heading Alternative Subtransmission Alignment 2, the first paragraph has been amended a follows:

Construction, operation and maintenance activities associated with Alternative Subtransmission Alignment 2 would be similar to the Proposed Project. <u>In addition to</u>

the subtransmission alignments following a different route than under the Proposed Project, a telecommunication line would be required for this alternative that would travel west from the proposed substation site under Hwy 23 and along Read Road. Modification of access roads east of Hwy 23 could also be necessary as would some potential tree removal and/or tree trimming. Work would take place primarily within existing road ROW and would therefore not affect adjacent land uses.

4.10-17 Under the heading **City of Thousand Oaks Zoning Ordinance**, the last sentence of the first paragraph has been amended a follows:

Consequently, Alternative Subtransmission Alignment 2 would not conflict with these zoning designations.

4.10-17 Under the heading **City of Thousand Oaks Zoning Ordinance**, the second sentence of the second paragraph is corrected as follows:

If the City of Thousand Oaks's Quasi-Public, and Institutional Lands and Facilities zoning requirements applied to the Proposed Project, a special use permit would be required.

4.10-17 Under the heading **City of Simi Valley General Plan**, the last sentence has been amended a follows:

The General Plan does not discuss the allowance or disallowance of transmission line facilities within these land use designations and therefore Alternative Subtransmission Alignment 2 would not conflict with the General Plan, even if the General Plan were applicable.

4.10-18 Under the heading Alternative Subtransmission Alignment 3, the first paragraph has been amended a follows:

Construction, operation and maintenance activities associated with Alternative Subtransmission Alignment 3 would be similar to the Proposed Project. <u>Some additional groundwork and grading would be required, but would primarily take place within existing road ROW.</u>

4.10-18 Under the heading Alternative Substation Site B, the first paragraph has been amended a follows:

Construction, operation and maintenance activities associated with Alternative Substation Site B would be similar to the Proposed Project with the addition of a <u>16-foot high retaining wall</u>. Alternative Substation Site B would not physically divide an established community as it would be constructed at an already <u>developed site</u>; no local land use plans, policies and regulations, including discretionary permit requirements, would apply; and no HCPs or NCCPs cover lands within the Alternative Substation Site B (No Impact).

4.10-19 Under the heading **City of Simi Valley General Plan**, the first sentence of the first paragraph is corrected as follows:

The proposed Alternative Substation Site B would be located within the jurisdiction of the City of Simi Valley in a parcel designated as Institutional/Public (City of Simi Valley, 2007).

4.10-19 *The following text has been removed:*

System Alternative B

Implementation of the Systems Alternative B would not require any new facilities to be constructed; all changes would take place within existing facility footprints. Implementation of this alternative would not physically divide an established community; conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the Proposed Project; or conflict with an applicable HCP or NCCP. Therefore, the Systems Alternative B would have no impact (No Impact).

4.10-19 *The following references have been removed from heading References-Land Use and Planning:*

California Department of Conservation, 2007. Williamson Act Program - Farmland Security Zones, Questions and Answers, 2007

City of Thousand Oaks, 2009c. City of Thousand Oaks Municipal Code, Chapter 5, adopted March, 2009.

Section 4.11, Noise

4.11-7 In the second sentence of the first paragraph under the heading **Proposed Project**, the name of the child care center has been corrected as follows:

There are also approximately four dozen residences located farther south and east of the Substation site, along Fresh Meadows Road and Shoal Creek Court, and the Tudor <u>Tutor</u> Time Child Care Center is located approximately 300 feet east of the site.

4.11-8 The text under the heading **System Alternative B** has been removed:

System Alternative B

System Alternative B would require upgrades at existing Royal, Thousand Oaks, and Potrero substations. Royal and Potrero Substations are surrounded by commercial uses; however, Thousand Oaks Substation is surrounded on the west, south, and east by multi-family residential buildings as close as 35 feet from the Thousand Oaks Substation, and to the north are approximately eight single-family residences at distances between 100 and 200 feet. Pinecrest School is approximately 300 feet to the east of the Thousand Oaks Substation.

4.11-10 The following heading is corrected as follows:

City of Thousand Oaks (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.11-11 *The following heading is corrected as follows:*

City of Simi Valley (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.11-12 Under the heading **4.11.4 Impacts and Mitigation Measures**, the last sentence in the second paragraph has been revised as follows:

Impacts were assessed by comparing the modeled noise levels of construction equipment and operational activities to applicable noise regulations and/or the ambient noise environment, and short-term increases in ambient noise levels would be considered significant if the increased noise levels would result in an adverse community reaction.

4.11-13 Under the heading **Impact 4.11-1**, the following sentence in the third paragraph has been corrected as follows:

For example, a water truck would operate approximately three hour per day during the Substation civil construction activities, therefore a<u>n average hourly</u> usage factor of 30 percent was used to estimate the water truck L_{eq} noise levels associated with that construction activity.

4.11-18 The name of the child care center has been corrected in the second paragraph under the heading *Substation Transformers*:

The nearest sensitive receptors to the perimeter of the proposed Presidential Substation site are Tudor Tutor Time Child Care Center approximately 300 feet to the east and approximately 10 residences along Adirondack Court approximately 600 to 1,000 feet to the south.

4.11-19 The following paragraph has been added under Table 4.11-5:

As shown in Tables 4.11-1 and 4.11-2, daytime ambient noise levels in the project area average between 43 and 64 dBA. Considering the estimated noise levels at sensitive receptors identified in Table 4.11-5, ambient noise levels at those sensitive receptors could be increased by between 0 dBA and 34 dBA. Therefore, some of the existing sensitive receptors in the project area would experience a temporary increase in noise levels above those existing without the Proposed Project. **4.11-19** The second sentence of the paragraph under **Table 4.11-5** has been revised as follows:

Given that L_{eq} noise levels at the nearest Simi Valley sensitive receptors would be limited to 69 dBA at the Tudor Tutor Time Child Care Center and 62 dBA at the nearest residences, and the L_{eq} noise levels at the nearest Thousand Oaks sensitive receptors would range between 61 dBA and 85 dBA, the increase in local noise levels would not be expected to be substantial at nearby sensitive receptors.

4.11-23 The text under the heading System Alternative B has been removed:

System Alternative B

Under System Alternative B, short-term construction activities at Royal, Thousand Oaks, and Potrero Substations would result in similar overall noise levels compared to the construction activities that would result for the proposed Presidential Substation. Average noise levels at the closest residences to Thousand Oaks Substation are estimated to be up to 89 dBA. However, it is anticipated that the construction period for each of the substations would be substantially shorter than the construction period that would be associated with the proposed Presidential Substation. Construction activities under System Alternative B would result in impacts that would be mitigated to less than significant (Class II) with implementation of Mitigation Measures 4.11–1a and 4.11–1b. Like the Proposed Project, System Alternative B would result in less than significant impacts related to exposing sensitive receptors to vibration and to periodic employee vehicle noise during maintenance activities (Class III).

4.11-24 The text under the heading **Impact 4.11**, has been removed:

Impact 4.11-SAB-1: Transformer noise under System Alternative B at Thousand Oaks Substation would increase noise levels at nearby residences, potentially conflicting with City of Thousand Oaks noise standards. *Less than significant with mitigation* (Class II)

The new transformers that would replace the existing transformers at Thousand Oaks Substation would be located approximately 100 feet from the nearest sensitive receptors. Assuming that the new larger transformers would have twice the sound pressure level of the existing transformers, the associated CNEL would be approximately 55 dBA. According to the Thousand Oaks General Plan Noise Element, if the cumulative CNEL is expected to be 55 to 60 dB, then a project would be considered to have an individually significant impact if it would increase noise levels by greater than 1 dB. Given the residential characteristics in the vicinity of Thousand Oaks Substation and the substation's location setback from the nearest public roadways, it is anticipated that the average CNEL at the substation is directly influenced by the existing transformers, which are estimated to produce an average noise level of approximately 52 CNEL at 100 feet. Therefore, implementation of System Alternative B could result in CNEL noise levels at residences adjacent to Thousand Oaks Substation that would be approximately three dBA higher than ambient conditions, potentially resulting in a significant impact. However, implementation of **Mitigation Measure 4.11-SAB-1** would ensure that SCE would design the upgrades to Thousand Oaks Substation such that transformer noise levels would not exceed City of Thousand Oaks's noise standards.

Mitigation Measure 4.11-SAB-1: Thousand Oaks Substation. SCE shall ensure that noise levels associated with the Thousand Oaks Substation do not exceed the City of Thousand Oaks noise standards. Noise control techniques may include, but not be limited to: locating the new transformers with as much setback from the existing residential properties as possible, use of noise walls or equivalent sound attenuation devices, and the use of transformers with special noise control specifications designed in a way to specifically achieve acceptable regulatory noise standards.

Prior to the installation of the new transformers, SCE shall submit to the CPUC and the City of Thousand Oaks, for review and approval, a plan that describes the specific measures that will be taken in order to comply with the City's noise standards. SCE shall retain an acoustical engineer to perform noise measurements in the vicinity of the adjacent residences prior to and after the proposed transformers are operational, to verify that transformer noise levels comply with the County standards. Documentation of compliance shall be submitted to the CPUC and City of Thousand Oaks. In the event the transformer noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.

Significance after Mitigation: Less than Significant.

Section 4.12, Population and Housing

4.12-1 Under the heading **4.12 Population and Housing**, the following sentence is corrected as follows:

<u>SCE anticipates that</u> Project construction would<u>could</u> also involve a temporary marshalling yard in the City of Moorpark<u>, City of Thousand Oaks</u>, or the City of Santa Clarita.

4.12-2	<i>Table 4.12-2</i> ,	has been	revised	as follows:
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Area	1980 a	1990 b	% Change 1980–1990	2000 b	% Change 1990–2000	2005 b	% Change 2000–2005	2010c	% Change 2005–2010	2020 d	% Change 2010–2020	2035 d	% Change 2015 2020– 2035
Ventura County	529,174	666,800	26%	749,740	11%	809,286	7%	822,108	2%	910,328	11%	978,978	8%
Thousand Oaks	77,072	104,800	36%	116,535	10%	126,344	8%	126,655	0%	131,865	4%	133,075	1%
Simi Valley	77,500	99,600	29%	110,732	10%	120,686	8%	124,238	3%	131,894	6%	135,389	3%

TABLE 4.12-2HISTORIC AND PROJECTED POPULATION GROWTH, 1980–2035

4.12-3 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.12-3 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.12-4 Under the heading, **Impact 4.12-1**, the third sentence of the first paragraph has been revised as follows:

The proposed subtransmission alignment would be <u>primarily</u> within an established utility corridor, <u>existing road ROWs containing overhead utilities</u>, which would continue to be used as a utility corridor<u>for utilities</u>.

4.12-5 Under the heading, **Impact 4.12-1**, the second paragraph has been amended as follows:

Therefore, overall<u>Overall</u>, employment generated by the Proposed Project would have no impact on population growth because any short-term housing demand created during construction could be accommodated by existing units and no longterm growth would result from operation and maintenance of the Proposed Project.

4.12-5 Under the heading **b**), the first sentence of the first paragraph is revised as follows:

The proposed subtransmission alignment would be constructed within 3.5 miles of an existing <u>utility corridor overhead utility ROW</u>, generally paralleling local and County roads as well as traversing open space and agricultural areas.

4.12-7 Under the heading Alternative Substation Site B, the first paragraph has been amended as follows:

Construction, operation and maintenance activities associated with Alternative Substation B would be the same as under the Proposed Project. Duration of construction is also expected to be similar to the proposed project.; however, it would require the construction of an approximately 16-foot high perimeter wall, which is higher than the wall proposed for the Proposed Project. Therefore, total project construction of Alternative Substation Site B would be expected to be proportionately longer than the Proposed Project. However, the additional construction time necessary for Alternative Substation Site B would not induce substantial population growth directly or indirectly, as it would use the same labor pool as the Proposed Project; therefore, impacts related to population and housing would be the same as under the Proposed Project. Alternative Substation Site B would differ from the Proposed Project because it is located on a parcel of land that contains numerous structures and buildings, including several abandoned concrete block buildings and structures, a garage, former underground fuel storage tanks, and parking areas.

4.12-7 *The following text has been removed:*

System Alternative B

Operation and maintenance activities associated with System Alternative B would be similar to the Proposed Project. This alternative would not require the construction of a new substation and associated subtransmission lines. Construction activities associated with upgrading the Royal and Potrero substations would require a similar number or fewer temporary construction personnel than the Proposed Project, and would consequently not induce substantial population growth directly or indirectly. Additionally, implementation of System Alternative B would not displace any residential housing units or people. Therefore, impacts related to population and housing would be less than the Proposed Project (i.e. less than significant) and would require no mitigation (Class III).

Section 4.13, Public Services

4.13-4 Table 4.13-1, has been revised as follows:

TABLE 4.13-1
CHILD CARE FACILITIES IN VICINITY OF PROPOSED PROJECT AND ALTERNATIVES

Childcare/Daycare	Address	Distance from Proposed Project or alternative
Tutor Time Childcare/ Learning Center	1080 Country Club Drive West, Simi Valley	400 feet west east of the Proposed Project and Alternative Subtransmission Alignments 1 and 3; adjacent to Alternative Subtransmission Alignment 2; approximately 550 feet from Alternative Substation Site B

4.13-4 Under the heading *Libraries*, the first paragraph has been amended as follows:

The Ronald Reagan Presidential Library, at 40 Presidential Drive in the City of Simi Valley, is located approximately 0.7 mile northeast of the Proposed Project, approximately 0.2 mile east of Alternative Subtransmission Alignment 1, approximately 0.4 mile north of Alternative Subtransmission Alignment 2, approximately 0.4 mile northeast of Alternative Subtransmission Alignment 3, and approximately 0.4 mile northeast of Alternative Subtransmission Alignment 3, and approximately 0.4 mile northeast of Alternative Subtransmission Site B (RRPFL, 2009).

4.13-6 Under the heading **a.i**) Fire Protection, the third sentence of the first paragraph is revised as follows:

The proposed subtransmission alignment would be constructed in an existing utility corridor primarily within road ROW with current utility facilities and the proposed Presidential Substation would be an unmanned facility.

4.13-7 Under the heading **a.ii**) **Police Protection**, the first sentence of the third paragraph is revised as follows:

Once constructed, the subtransmission line and proposed Presidential Substation would <u>could</u> require monitoring in the form of police response to potential trespassing.

4.13-7 Under the heading **a.ii**) **Police Protection**, the last sentence of the third paragraph is revised as follows:

Therefore, operation and maintenance of the Proposed Project would not result in the need for new or altered police protection facilities (No Impact).

4.13-9 Under the heading Alternative Subtransmission Alignment 3, the first paragraph has been amended as follows:

Operation and maintenance activities associated with Alternative Subtransmission Alignment 3 would be the same as under the Proposed Project (No Impact). During construction, additional portions of Alternative Subtransmission Alignment 3 subtransmission alignment would be installed underground compared to the Proposed Project. <u>To do this, the road shoulder would need to be widened and some</u> <u>additional retaining walls may be required.</u> In addition, some sections of the existing 16 kV distribution line would not need to be relocated and would instead remain in place on the existing wooden poles.

4.13-10 Under the heading Alternative Substation Site B, the first paragraph has been amended as follows:

Although Alternative Substation Site B would differ from the Proposed Project in that it would be located in the City of Simi Valley, construction, operation and maintenance activities associated with Alternative Substation Site B would be the same as <u>under or similar to</u> the Proposed Project. <u>Construction would differ in that</u> the substation perimeter wall would be taller than under the Proposed Project, and existing structures onsite would need to be removed. However, overall, the duration Duration of construction would also be similar to the Proposed Project. Alternative Substation Site B would differ from the Proposed Project because it is located on a parcel of land that contains numerous structures and buildings, including several abandoned concrete block buildings and structures, a garage, former underground fuel storage tanks, and parking areas.

4.13-10 The following text has been removed:

System Alternative B

System Alternative B would not require the construction of a new substation and associated subtransmission alignments, and would require a shorter construction

period and smaller crew than under the Proposed Project. As such, System Alternative B would not generate a substantial temporary or permanent service population that would result in the need for new or physically altered fire protection, police protection, school, park, or other public service facilities (No Impact).

4.13-10 The following change has been made to the County of Ventura General Plan reference:

County of Ventura, Ventura County, 2008. *Ventura County General Plan: Goals, Policies, and Programs*, September 9, 2008.

4.13-11 The following reference has been removed from the References list:

Simi Valley Police Department (SVPD), 2009. City of Simi Valley Police Department — Welcome to the Simi Valley Police Department, www.simivalley.org/index.aspx?page=221, accessed July 22, 2009.

Section 4.14, Recreation

4.14-7 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.14-7 *The following heading is corrected as follows:*

City of Thousand Oaks Bicycle Facilities Master Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.14-8 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.14-8 *The following heading is corrected as follows:*

Simi Valley Bicycle Master Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.14-8 *The following heading is corrected as follows:*

City of Simi Valley Wood Ranch Specific Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.14-11 *The following text has been removed:*

System Alternative B

Implementation of System Alternative B would result in the construction of no new facilities; all changes would take place on existing facility footprints. Implementation of this alternative would not increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, System Alternative B would have no impact (No impact) relating to recreation resources.

4.14-11 The following reference has been removed:

City of Thousand Oaks, 2008. City of Thousand Oaks Bike Route Map Brochure, published August 2008.

4.14-12 The following references have been removed:

Underwood, 2009. Craig Underwood, Owner, Underwood Family Farms, email communication with Rachel Baudler, ESA, July 31-August 28, 2009.

Ventura County Transportation Commission (VCTC), 2009. Draft Ventura County Congestion Management Program, Chapter 4. May 26, 2009.

Section 4.15, Transportation and Traffic

4.15-1 Under the heading **4.15.1 Setting**, the first paragraph has been amended as follows:

The Proposed Project is located northeast of the City of Thousand Oaks in southern southeastern Ventura County.

4.15-3 Under the heading, *Local Roadway Network*, the first sentence of the third paragraph, has been amended as follows:

The following table <u>Table 4.15-1</u> includes a list of study area roadway segments and the agency or local municipality that has jurisdiction over the roadway.

4.15-4 Under the heading **Traffic Volumes and Levels of Service**, the text has been revised as follows:

Roadway conditions are analyzed based on Average Daily Traffic (ADT), <u>and Peak</u> <u>Hour</u> Level of Service (LOS), and Volume to Capacity (V/C) ratio.

4.15-4 *The reference at the end of Table 4.15-2 has been revised as follows:*

SOURCE: TRB, 20102000

4.15-7 *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative)

4.15-7 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative)

4.15-8 Under the heading, Construction Easement Requirements, the text has been revised as follows:

Existing paved public roads and unpaved access roads would be used to provide necessary construction access. Construction vehicles would use a combination of existing paved and unpaved public and private roads.

4.15-8 Under the heading, **Construction Easement Requirements**, the second paragraph has been revised as follows:

An unpaved dirt road provides access to the 16 kV distribution circuit between Hwy 23 and the proposed Presidential Substation site, and is approximately 0.5 mile long. SCE has an access easement for maintenance of the existing 16 kV distribution circuit but it is anticipated that approximately 0.3 mile of this access road could require rehabilitation and widening to support proposed subtransmission alignment construction activities. The existing road ranges between eight and ten feet in width, subtransmission construction and maintenance activities would require widening the road to fourteen feet. In addition, construction activities would use paved and unpaved roads east of Hwy 23, north of Olsen Road, as depicted on **Figure 2-10**. Grubbing and clearing would be required for use of an existing unpaved access road off Olsen/Madera Road. These unpaved access roads would necessitate rehabilitation and widening to a finished width of 14 feet.

4.15-10 Under the heading, **Proposed Presidential Substation Construction**, the second paragraph has been revised as follows:

The Proposed Project would require approximately 40,000 cubic yards of fill, which would generate approximately 5,4404,000 truck loads to bring the fill to the proposed Presidential Substation site from offsite locations, assuming an average truck capacity of 10 cubic yards (SCE, 2012d). Grading is expected to take 90 work days and assuming that the truck trips are divided evenly over the 90 days, there would be approximately 6045 fill deliveries per day, or 12090 one-way truck trips. The impact from the additional 12090 truck trips would include short-term and intermittent lessening of roadway capacities due to slower movements and larger turning radii of the trucks compared to passenger vehicles.

4.15-10 Under the heading, **Proposed Presidential Substation Construction**, the following sentence has been added to the end of the third paragraph:

However, it is acknowledged that truck traffic during peak commute hours on State highways could affect traffic flow and should be avoided to the extent feasible.

4.15-10 Under the heading, **Proposed Presidential Substation Construction**, the last sentence of the fourth paragraph has been revised as follows:

It is estimated that trenching would take 104 work days, the vault delivery, cable pulling, switch installation and cable splicing would take 59 work days, and paving would take seven work days, thus, <u>portions of the bike lane would be closed intermittently</u> for approximately eight months.

4.15-10 Under the heading, **Proposed Subtransmission Alignment Construction**, the text has been revised as follows:

The proposed subtransmission alignment construction activities would consist of replacing approximately 89 existing wooden poles and four steel poles with approximately 66 steel poles with polymer insulators <u>primarily</u> within the existing <u>road</u> ROW.

4.15-11 Under the heading, **Proposed Subtransmission Alignment Construction**, the second sentence of the second paragraph has been revised as follows:

The placement of the proposed subtransmission alignment on poles <u>across along</u> Read Road would temporarily disrupt existing transportation and traffic patterns in the vicinity of the crossing.

4.15-12 Under the heading, **Operations**, the text has been revised as follows:

Maintenance activities would not increase above existing levels that are employed to maintain the existing subtransmission line ROWsutility facilities and therefore, would not result in an increase in traffic in the study area.

4.15-12 The following changes have been made to Mitigation Measure 4.15-1a:

Mitigation Measure 4.15-1a: SCE shall obtain and comply with local road encroachment permits for public roads that are crossed by the proposed subtransmission alignment. SCE shall also coordinatenotify the owner of any private road east of Hwy 23 that would be crossed by the proposed subtransmission alignment regarding short-term construction activities at private-road crossings with the applicable private property owners. Copies of all encroachment permits for those specific construction activities that would involve the crossing of a public road, and evidence of private property-coordinationowner notification for those construction activities that would involve the crossing of a private road east of <u>Hwy 23</u> shall be provided to the CPUC prior to the commencement of <u>those</u> <u>specific</u> construction activities.

- **4.15-12** Under *Mitigation Measure* **4.15-1b**, the following bullet item has been added:
 - <u>Limit construction-related truck traffic on State highways to off-peak traffic</u> hours to the extent feasible.
- **4.15-15** Under the heading, **Impact 4.15-3**, the following has been added after the third paragraph has been revised as follows:

The above-described impact is considered potentially significant and mitigable to a less-than-significant level by implementing Mitigation Measure 4.15-3.

4.15-15 Under the heading, *Impact 4.15-3*, the fourth paragraph has been revised as follows:

This impact is considered potentially significant and mitigable to less thansignificant levels by implementing Mitigation Measures 4.15-3a and 4.15-3b. Pursuant to franchise agreements with local jurisdictions and/or applicable local jurisdiction encroachment permits, SCE would makes repairs to roads damaged by construction to a structural condition equal to that which existed prior to construction activity. Encroachment agreements typically require a meeting be held with the contractor and applicable city/county staff prior to construction starting.

4.15-15 Under the heading, **Operations**, **Mitigation Measure 4.15-3a**, has been revised as follows:

Mitigation Measure 4.15-3a <u>Mitigation Measure 4.15-3</u>: Implement Mitigation Measure 4.15-1a, Mitigation Measure 4.15-1b, and Mitigation Measure 4.15-1c.

4.15-15 Under the heading, Operations, Mitigation Measure 4.15-3b has been removed:

Mitigation Measure 4.15-3b: Roads damaged by construction would be repaired to a structural condition equal to that which existed prior to construction activity. The Project Partners and the local jurisdiction shall enter into an agreement prior to construction that will detail the pre-construction conditions and the post-construction requirements of the rehabilitation program.

4.15-17 Under the heading, No Project Alternative, the text has been revised as follows:

Implementation of this alternative would not affect area roadways or bike lanes and would not result in inadequate emergency access or parking capacity (No Impact).

4.15-17 Under the heading, Alternative Subtransmission Alignment 1, the first paragraph has been amended as follows:

The location for Alternative Subtransmission Alignment 1 would be the same as the Proposed Project thus, a along Read Road. Alternative Subtransmission Alignment 1 would not be placed along Sunset Valley Road, but a second source line would be placed along Esperance Road (an unpaved, local roadway), and the total of approximately 10,880 one-way truck trips (120 per day) would be number of daily truck trips required to bring fill to the work sites would be similar to the Proposed Project. This alternative would also require temporary road closures/partial road closures and temporary road crossing closures during the construction of new poles, the stringing of conductor, and the removal of old poles. The location for the proposed Presidential Substation for Alternative Subtransmission Alignment 1 would be the same as the Proposed Project, thus, approximately 60-about 45 daily round-trip truck trips would be required to bring fill to the site. Impacts from increased truck traffic for Alternative Subtransmission Alignment 1 would be the same as the Proposed Project. As stated above, Alternative Subtransmission Alignment 1 would not encroach on Sunset Valley Road, and thus, would not impede access to the Underwood Family Farms as the Proposed Project would. Implementation of Mitigation Measure 4.15-1a through 4.15-1d, and Mitigation Measure 4.15-3b, would reduce construction-related impacts to area roadways to a less than significant level.

4.15-17 Under the heading, Alternative Subtransmission Alignment 2, the third sentence of the first paragraph, has been amended as follows:

Unlike the Proposed Project, this alternative would not result in potential impacts to the Class II bike lane on Tierra Rejada Road, or the Class III bike route on Read Road.

4.15-18 Under the heading, Alternative Subtransmission Alignment 2, the text has been revised as follows:

The location for the proposed Presidential Substation for Alternative Subtransmission Alignment 2 would be the same as the Proposed Project, thus, approximately <u>6045</u> daily round-trip truck trips would be required to bring fill to the site. <u>A telecommunication line would be required for this alternative, traveling</u> west from the proposed substation site under Hwy 23 and along Read Road. <u>Modification of access roads east of Hwy 23 could also be necessary as would</u> <u>some potential tree removal and/or tree trimming.</u> Impacts from increased truck traffic for Alternative Subtransmission Alignment 2 would be the same as greater than the Proposed Project. Alternative Subtransmission Alignment 2 would not encroach on Sunset Valley Road, and thus, would not impede access to the Underwood Family Farms as the Proposed Project would. Implementation of Mitigation Measure 4.15-1a through 4.15-1d, and Mitigation Measure 4.15-3b, would reduce construction-related impacts to area roadways to a less than significant level. **4.15-18** Under the heading, Alternative Subtransmission Alignment 3, the following text has been added after the second sentence:

Alternative Subtransmission Alignment 3 would require additional road closures for the purpose of undergrounding subtransmission lines. <u>Additionally, for the</u> <u>portion of the alignment that would be undergrounded, SCE would construct a</u> <u>large flat pad to accommodate construction vehicles, turnaround areas, crane pad</u> <u>areas for installing the vault, and access roads for construction and maintenance,</u> <u>which may also require road closures.</u>

4.15-18 Under the heading, Alternative Subtransmission Alignment 3, the end of the first paragraph, has been amended as follows:

The location for the proposed Presidential Substation for Alternative Subtransmission Alignment 3 would be the same as the Proposed Project, thus, approximately <u>6045</u> daily round-trip truck trips would be required to bring fill to the site. Impacts from increased truck traffic for Alternative Subtransmission Alignment 3 would be the same asgreater than the Proposed Project. Alternative Subtransmission Alignment 3 would encroach on Sunset Valley Road, and thus, would impede access to the Underwood Family Farms as would the Proposed Project, and would result in the same potential impacts to the Class II bike lane on Tierra Rejada Road, and the Class III bike route on Read Road. Implementation of Mitigation Measure 4.15-1a through 4.15-1d, and Mitigation Measure 4.15-3b, would reduce construction-related impacts to area roadways to a less than significant level.

4.15-19 Under the heading, Alternative Substation Site B, the end of the first paragraph, has been amended as follows:

The demolition and hauling would create truck trips to and from the site, <u>as would</u> the construction of the retaining wall required on the south side of the parcel, but likely fewer than the <u>6045</u> daily round trips needed to haul fill to the proposed Presidential Substation site. As with the Proposed Project, all impacts to area roadways from construction would be <u>short-term and</u> temporary, and implementation of Mitigation Measures 4.15-1a through 4.15-1d, and Mitigation Measure 4.15 3b, would reduce impacts to a less than significant level.

4.15-19 The following text has been removed:

System Alternative B

Construction-related impacts associated with this alternative would be less than the proposed project. System Alternative B would require upgrades at existing Royal, Thousand Oaks, and Potrero substations. These substation sites are already developed, and the proposed upgrades would not require construction-related truck trips associated with grading activities or the delivery of fill material. Construction

activities under System Alternative B would primarily be associated with replacing the existing transformers at Royal, Thousand Oaks, and Potrero substations with new transformers. There could also be a need to replace and/or add some distribution equipment at the substations. Therefore, the number of construction trips needed for delivery of equipment and the circulation of construction employee vehicles would be minimal. Similar to the proposed project, construction related impacts would be short-term and temporary, and implementation of Mitigation Measures 4.15-1a through 4.15-1d, and Mitigation Measure 4.15-3b, would reduce impacts to a less than significant level.

Similar to the proposed project, operating System Alternative B would not cause a substantial increase in traffic in the study area because this alternative would not create trip generating land uses (such as residences or retail centers), and this alternative would require a minimal number of trips for maintenance activities.

4.15-20 Under **References** – **Transportation and Traffic**, the following reference has been added:

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SCE, 2012d. Southern California Edison, Data Request Response 7, February 24, 2012.
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Transportation Research Board (TRB), 2000. Highway Capacity Manual.

Section 4.16, Utilities and Service Systems

4.16-3 *The heading for Storm Water Management has been correct as follows:*

Storm water Water Management

4.16-6 Under the heading, **Ventura County Construction and Demolition Debris Ordinance**, the first paragraph, has been amended as follows:

The Tulare Ventura County Recycling and Conversion of Construction and Demolition Debris Ordinances (Ordinance Number 43574421 and 4308), adopted in 20072010 and 2004, establishesestablish regulations for the recycling and diversion of Construction and Demolition (C&D) Debris within unincorporated areas in Ventura County. Both ordinances assist the County in its efforts to meet the requirements of AB 939. According to the ordinance, applicants for a Covered Project² must complete and submit a C&D Debris Recycling Plan as a prerequisite for Permit issuance. The C&D Recycling Plan must be reapproved by the C&D Recycling Compliance Official, and prior to completion of the project the Applicant must submit a C&D Debris Recycling Report showing compliance with the Plan. According to the ordinance, the applicant must divert a minimum of 60 percent of the C&D debris resulting from the project (County of Ventura, 20072010). The applicant must fill out a summary table at the completion of the

project, and submit it to the Ventura County Integrated Waste Management Division at the conclusion of project work. The summary table must include the contractor's name, address, and phone number, the project's name, the types of recyclable materials generated during the project (e.g., metal, concrete, asphalt, rebar, wood, soil, greenwaste) and the approximate weight of recyclable materials. Receipts and/or documentation are required for each entry in the summary table to verify recycling and/or reuse occurred, and that recyclable greenwaste, wood, soil, and sediment generated by this project was not landfilled.

- **4.16-6** *Footnote 2 has been updated to reflect the language in Ordinance 4421:*
 - (3) New structures of 1,000 square feet or more of gross floor area irrespective of gross floor area or valuation;
- **4.16-6** *The following heading is corrected as follows:*

City of Thousand Oaks General Plan (Proposed Project and Alternative Subtransmission Alignments 1, 2 and 3; System Alternative B)

4.16-7 *The following heading is corrected as follows:*

City of Simi Valley General Plan (Alternative Subtransmission Alignment 2; Alternative Substation Site B; System Alternative B)

4.16-8 Under the heading, *Impact 4.16-1*, the first paragraph has been revised as follows:

The only wastewater generated during construction would be from the use of portable, <u>a one time limited timeframe.</u> <u>sanitation facilities.</u> Furthermore, wastewater would be disposed of according to required regulations. No additional wastewater would be <u>The only wastewater</u> generated during operation or maintenance of the Proposed Project, as the Proposed Presidential Substation would not have bathroom facilities would be from the use of portable sanitation facilities at the Proposed Presidential Substation</u>. Therefore, this impact would be less than significant. See also, e) below.

4.16-10 The third sentence in the paragraph that begins "As discussed in Section 4.9, *Hydrology and Water Quality...*" has been removed:

The Proposed Project would reduce the EIA at the Substation to less than 5 percent of the Substation project area, and runoff from impervious areas in excess of the 5 percent allowance would be retained on site.

4.16-10 Under the heading, *Impact 4.16-2*, the last sentence has been revised as follows:

Construction, operation and maintenance of the Proposed <u>Project</u> would therefore not require new or expanded <u>wasterwater</u> supply resources or entitlements.

4.16-11 The following revisions have been made to the paragraph discussing **Impact 4.16-3**:

In addition, construction crews would use portable sanitation facilities (portable toilets), generating relatively small volumes of wastewater for a limited time during the construction phase. and the proposed Presidential Substation would have a portable sanitation facility during operation for those accessing the site for routine maintenance and inspections. These toilets would generate a relatively small volume of wastewater during the construction, operations and maintenance phases. Sanitation would be disposed of according to sanitation waste management practices. No other sources of wastewater are anticipated during the Proposed Project construction activities. No additional wastewater would be generated, or during operation or maintenance of the Proposed Project, as the proposed Project would not affect a wastewater treatment provider's capacity to serve its existing commitments, and this impact would be less than significant.

4.16-12 Under the heading, **Impact 4.16-4**, the following sentence was added before the last sentence in the last paragraph:

The C&D Debris Recycling Plan submitted by the applicant would include specifications ensuring that the Proposed Project meets all Ventura County solid waste requirements, including details on construction material recycling, soil reuse and recycling, and green waste. Also, because the local landfills would have sufficient capacity to accept the remainder of SCE's construction waste (i.e., a combined remaining capacity of 42.6 million cubic yards of waste), this would be a less-than-significant impact.

4.16-13 Under the heading, **Impact 4.16-5**, the following clarifications were made to the third paragraph:

Nevertheless, as stated in Section 4.16.1, *Regulatory Context*, Ventura County has a construction and demolition ordinanceordinances that establishesestablish diversion requirements for construction and demolition occurring within unincorporated areas.

4.16-14 Under the heading, Alternative Subtransmission Alignment 3, the description of removing former underground storage tanks has been corrected:

Alternative 3 would not require the construction of additional access roads east of Hwy 23, or the replacement of the existing wood poles from the intersection of Sunset Valley and Read Road east to the proposed Presidential Substation site. Some additional widening and grading of the access road along the 66 kV underground alignment may be necessary if engineering determines existing access roads do not meet standards required for construction equipment.

4.16-15 Under the heading, Alternative Substation Site B, the description of removing former underground storage tanks has been corrected:

However, construction of Alternative Substation Site B would involve greater impacts than those described for the proposed Presidential Substation, as construction would require the removal of existing structures on the site, including several abandoned concrete block buildings and structures, a garage, former underground storage tanks, and parking areas.

4.16-15 *The following text and heading have been removed:*

System Alternative B

This alternative would consist of upgrading the Royal, Thousand Oaks, and Potrero substations by replacing the existing 16.8 MVA transformers with larger ones. The demands placed on local water, wastewater, and storm drainage, would be less than the Proposed Project. Construction of System Alternative B would also generate similar or less impacts regarding solid waste disposal than those described for the Proposed Project. System Alternative B would not require the construction of a new substation and associated subtransmission line; construction would require the removal of existing structures at the substations, including 16.8 MVA transformers. Installing larger transformers could also require the replacement of some existing 16 kV distribution equipment located inside and outside of the substation footprint. Additional 16kV circuits may be required at some locations or existing 16kV getaway equipment may need to be upgraded. However, System Alternative B would not require the removal of 89 wood poles and 4 TSPs. As such, System Alternative B would generate less waste from construction activities. Overall, like the Proposed Project, there would be no need for construction or expansion of water, wastewater, or stormwater drainage facilities (No Impact), and impacts to wastewater treatment and solid waste facilities would be less than significant with no mitigation required. Therefore, this alternative would result in no impact to utility services regarding b) and c) (No Impact), and less than significant impacts regarding criteria a), d), e), f), and g) (Class III).

4.16-16 Under **References- Utilities and Service Systems**, references have been updated to reflect the updated ordinances:

County of Ventura, 2004. Ordinance No. 4308. Board of Supervisors, County of Ventura, State of California, June 22, 2004.

County of Ventura, 20072010. Ordinance No. 443574421. Board of Supervisors, County of Ventura, State of California, Tuesday January 9, 2007-November 23, 2010.

Chapter 5. Comparison of Alternatives

5-2 Under the heading, Step 1: Identification of Alternatives, the following clarifications were made:

Step 1: Identification of Alternatives. An alternatives screening process (described in Chapter 3, *Alternatives and Cumulative Projects*) was used to identify approximately <u>1617</u> alternatives to the Proposed Project. That screening process identified <u>eight-seven</u> alternatives (each combination of components is considered a separate alternative) for detailed EIR analysis.

5-2 Under the heading, **5.2 Evaluation of Project Alternatives**, the first sentence of the first paragraph, has been amended as follows:

This section compares the potential environmental impacts for the Proposed Project and eight-seven alternatives.

5-3 Under the heading, **5.2 Evaluation of Project Alternatives,** the first sentence of the fourth paragraph, has been amended as follows:

There would be significant unavoidable (Class I) air quality impacts under the Proposed Project and each alternative, except System Alternative B (**Table 5-1**).

5-3 Under the heading, **5.3 Environmentally Superior Alternative**, the second paragraph, has been revised as follows:

The selection of an Environmentally Superior Alternative is based on differences in intensity and duration of significant impacts (Table 5-2). Based on these differences the identified environmentally superior alternative is System Alternative B. This alternative would not result in any significant unavoidable impacts. System Alternative B, which does not involve the construction of a new substation, would meet most of the basic project objectives but would result in reduced operational flexibility and reliability compared to the Proposed Project, and other alternatives which involve construction of a new substation. All other alternatives would result in at least one significant unavoidable impact.

5-3 Under the heading, **5.3 Environmentally Superior Alternative**, the first sentence of the third paragraph, has been revised as follows:

Seven With the exception of the No Project Alternative, all of the alternatives combinations are variations of alignments and/or new substation location.

5-4 *Table 5-1* has been revised as follows:

		-			
			Ranking (1 = Most Environmentally Preferred Alternative and 4 = Least Environmentally Preferred Alternative)		
Alternative	Significant (Class I) Impacts	Substation Site	Sub- transmission Alignment		
Proposed Project – proposed Presidential Substation	Aesthetics – significant unavoidable: The Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views. Air Quality – significant unavoidable: The Proposed Project construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Significant unavoidable impacts would result from the combined emissions associated with all components of the Proposed Project.	₹ <u>2</u>			
Proposed Project – proposed subtransmission alignment	Aesthetics – significant unavoidable: The Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views. Air Quality – significant unavoidable: The Proposed Project construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Significant unavoidable impacts would result from the combined emissions associated with all components of the Proposed Project. Noise – significant unavoidable: The Proposed Project construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria. Significant unavoidable impacts would result from the proposed subtransmission line, 16kV distribution line and telecommunications cable and access road construction.		રુ 2		
Significant Impact	ts (Class I) Eliminated or Created by Alternatives				
Alternative Subtransmission Alignment 1	Aesthetics – significant unavoidable: Aesthetic impacts would be created on views from three equestrian centers and the Ronald Reagan Presidential Foundation and Ronald Reagan Presidential Library. Air Quality – significant unavoidable: Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. Noise – significant unavoidable: Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.		4- <u>3</u>		
Alternative Subtransmission Alignment 2	Aesthetics – significant unavoidable: Aesthetic impacts due to the presence of pole structures that would substantially degrade the existing visual character of the sites and their surroundings, and Class I impacts to approximately 2.7 miles of Olsen Road (designated Scenic Highway in the City of Thousand Oaks), and approximately 2.2 miles of Madera Road (designated Scenic Roadway in the City of Simi Valley). <i>Air Quality – significant unavoidable</i> : Construction activities would generate ozone precursor emissions (i.e., NOX) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable. <i>Noise – less than significant</i> : Construction activities would eliminate significant unavoidable impacts related to exceeding Ventura County construction noise threshold criteria because unincorporated Ventura County residents would not be impacted under this alternative.		4- <u>3</u>		

TABLE 5-1 SUMMARY OF SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES BY COMPONENT

			Ranking (1 = Most Environmentally Preferred Alternative and 4 = Least Environmentally Preferred Alternative)		
Alternative	Significant (Class I) Impacts	Substation Site	Sub- transmission Alignment		
Alternative Subtransmission Alignment 3	Aesthetics – less than significant. The subtransmission crossing of Olsen Road would be installed underground reducing the visual impact to less than significant.				
	Air Quality – significant unavoidable: Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable.		2 - <u>1</u>		
	<i>Noise – significant unavoidable</i> : Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.				
Alternative Substation	Aesthetics – less than significant. Elimination of eliminate Class I impacts related to aesthetic resources.				
Site B	Air Quality – significant unavoidable: Construction activities would generate ozone precursor emissions (i.e., NOx) that could contribute substantially to a violation of ozone air quality standards and would be cumulatively considerable.	2<u>1</u>			
	<i>Noise – less than significant.</i> Construction activities would not generate noise levels in unincorporated Ventura County in excess of Ventura County construction noise threshold criteria. Construction at this site would result in noise impacts less than significant.				
System Alternative B	Aesthetics - less than significant: Class I aesthetic impacts would be eliminated.				
	Air Quality — less than significant: Construction impacts in Ventura County associated with potential violation of ozone air quality standards and cumulatively considerable levels of NOx.		1		
	Noise — loss than significant short-term construction impacts: Class I noise impacts in Ventura County would be eliminated. Unlike the Proposed Project and Alternative Substation Site B, this alternative would result in long term operational impacts at the Thousand Oaks Substation. However, these impacts would be mitigated to loss than significant.				

5-5 Under the heading, **5.3 Environmentally Superior Alternative**, the fifth paragraph has been revised as follows:

As described above, System Alternative B is the only alternative which would not result in significant unavoidable impacts on any resource and is therefore ranked as the environmentally superior alternative. A No single alternative would provide an Environmentally Superior Alternative to both site and subtransmission environmental impacts; rather, a combination of Alternative Substation Site B with Alternative Subtransmission Alignment 3 would follow as the next be the environmentally preferred superior alternative. This combination would still result in significant unavoidable temporary impacts related to noise and air quality, but neither the substation nor the subtransmission alignment would result in permanent significant unavoidable impacts on aesthetics.

5-7 *The System Alternative B column has been removed from Table 5-2:*

Resource Area	System Alternative B
Aesthetics	Impacts would be less than the Proposed Project. Overall impacts would be less than significant.
	Preferred
	Least Impacts
Agriculture and Forestry	Impacts would be less than the Proposed Project.
Resources	No Preference
Air Quality	Impacts would be less than the Proposed Project. Overall, impacts would be mitigated to less than significant.
	Most Preferred
	Least Impact
Biological Resources	Impacts would be less than the Proposed Project.
	No Preference
	Least Impacts
Cultural Resources	Impacts would be less than the Proposed Project.
	No Preference
	Least Impacts
Geology, Soils, Seismicity	Impacts would be similar to the Proposed Project.
and Mineral Resources	No Preference
Greenhouse Gas Emissions	Impacts would be less than the Proposed Project.
	Most Preferred
	Least Impacts
Hazards and Hazardous	Impacts would be less than the Proposed Project.
Materials	No Preference
	Least Impacts
Hydrology/Water Quality	Impacts would be similar to Proposed Project but to a lesser degree.
	Most Preferred
Land Use/Planning	Impacts would be similar to the Proposed Project.
	No Preference
Noise	Construction impacts would less than significant.
	Operational impacts would be greater than the Proposed Project but mitigable to less than significant.
	Preferred
	Least Impacts
Population/Housing	Impacts would be similar to the Proposed Project.
	No Preference
Public Services	Impacts would be similar to Proposed Project but to a lesser degree.
	Preferred
Recreation	Impacts would be similar to Proposed Project but to a lesser degree.
	No Preference

TABLE 5-2 PROPOSED PROJECT VS. ALTERNATIVES SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	System Alternative B
Transportation/Traffic	Impacts would be less than the proposed project.
	No Preference
	Least Impacts
Utilities/Service Systems	Impacts would be similar to Proposed Project but to a lesser degree.
	No Preference
	Least Impacts

TABLE 5-2 PROPOSED PROJECT VS. ALTERNATIVES SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

5-7 The following change has been made to the Alternative Substation Site B with Alternative Subtransmission Alignment 3 column, in regards to aesthetic resources in Table 5-2:

Impacts would be less than the Proposed Project. Overall impacts would be mitigable to less than significant.

Most Preferred

5-7 The following change has been made to the Alternative Substation Site B with Proposed Subtransmission Alignment column, in regards to air quality resources in Table 5-2:

Impacts would be slightly less than <u>similar to</u> the Proposed Project, but still significant unavoidable.

Preferred <u>No</u> Preference

5-8 The following change has been made to the **Alternative Substation Site B with Alternative Subtransmission Alignment 3** column, in regards to noise in **Table 5-2**:

Construction impacts would be less than the Proposed Project, but still significant unavoidable.

Preferred No Preference

5-9 *The following row of* **Table 5-3** *has been revised:*

TABLE 5-3 ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE

Proposed Presidential Substation with Alternative Subtransmission Alignment 1	Alternative would have similar impacts as the Proposed Project. In addition, creates a new significant aesthetics impact would be created associated with Esperance Road subtransmission alignment.	Alternative would not include construction of <u>9,40012,500</u> feet of duct bank but would require a longer subtransmission alignment and more pole construction. Overall, construction emission <u>s</u> would be slightly reduced.	Alternative would result in noise impacts in new areas in addition to the Proposed Project. Impacts may be slightly reduced in some areas.

5-9 *The following row of Table 5-3 has been revised:*

TABLE 5-3 ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE							
Proposed Presidential Substation with Alternative Subtransmission Alignment 3	Alternative would install the subtransmission line under Olsen road, thereby eliminating the aesthetic impacts associated with the crossing. However, significant impacts would remain related to the proposed Presidential Substation site. Overall <u>impact</u> reduced but still significant unavoidable.	Alternative would eliminate construction emissions associated with access road construction and subtransmission alignment construction/pole replacement from Sunset Valley to the substation. Overall construction emissions would be reduced.	Impacts would be less than the Proposed Project because construction/pole replacement related to the subtransmission alignment would not be required for much of the alignment.				

5-10 The System Alternative **B** row has been removed from Table 5-3:

TABLE 5-3

ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE

System Alternative B Alternative would eliminate the significant unavoidable impacts associated with the substation site and Olsen Road crossing. Overall, impacts would be reduced to less than significant.	would not require n of a new pr subtransmission ing in less than mpacts on air mpacts on air the existing substations but would be mitigated to less than significant.
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5-10 Under the heading, **5.4.1 Summary of the No Project Alternative and Its Impacts**, the first sentence has been revised as follows:

The No Project Alternative is described in Section <u>3.4.6.3.4.5.</u> Under the No Project <u>alternative Alternative</u>, the Proposed Project would not be built and would therefore have no environmental impacts related to project construction and maintenance.

5-11 Under the heading, **5.4.2 Summary of the Environmentally Superior Alternative and Its** *Impacts, the first paragraph has been revised as follows:*

The Environmentally Superior Alternative is defined in Section 5.3 as <u>a</u> <u>combination of Alternative Substation Site B with Alternative Subtransmission</u> <u>Alignment 3 System Alternative B</u>. Impacts of <u>the Environmentally Superior</u> <u>Alternative System Alternative B</u> are defined in each resource area's impact analysis in Sections 4.1, *Aesthetics*, through 4.16, *Utilities and Service Systems*, and are also summarized in Table 5-2, above. The Environmentally Superior Alternative would <u>meet most basic project objectives but would still result in</u> <u>significant unavoidable (Class I) temporary impacts related to air quality and noise;</u> <u>however, neither the substation nor the subtransmission alignment would result in</u> <u>permanent significant unavoidable impacts on aesthetics</u> have no significant <u>unavoidable impacts. However, although System Alternative B would meet most</u> <u>basic project objectives, it would result in reduced operational flexibility compared</u> to the Proposed Project, and the seven alternatives involving construction of a new substation.

5-11 Under the heading, **5.4.3 Conclusion: Comparison of the Environmentally Superior Alternative with the No Project Alternative**, the first paragraph has been revised as follows:

> The Environmentally Superior Alternative (<u>Alternative Substation Site B with</u> <u>Alternative Subtransmission Alignment 3System Alternative B</u>) would result in less-than-significant impacts on aesthetics <u>but would still result in significant</u> <u>unavoidable (Class I) temporary impacts related to air quality and noise, noise and</u> <u>air quality resources and would have with</u> minimal long-term impacts on residences.

Chapter 6. CEQA Statutory Sections

6-4 Under the heading, **6.4 Cumulative Impacts**, the first paragraph has been revised as follows:

This section analyzes the potential for the Proposed Project to cause or contribute to significant cumulative effects when the impacts of projects listed in Table $\frac{3-123}{2}$ are considered together with the impacts of the Proposed Project.

6-5 *The following heading is corrected as follows:*

6.4.2 Agriculture and Forestry Resources

6-5 *The third paragraph under the heading* **6.4.2** *Agriculture Resources has been corrected to read:*

As shown in Table 3-123-3 in Section 3.6, *Cumulative Impacts*, an approved residential project at 4920 Read Road could cause impacts to Farmland adjacent to those of the Proposed Project. Table 3-123-3 also shows a number of projects not

yet in the environmental planning stage, where the acreage of Farmland that could be converted by these projects is unknown.

6-5 Under the heading **6.4.2** Agriculture Resources, the following impact statement has been added under the fourth paragraph:

Impact 6-1: The Proposed Project's incremental contribution (0.06 acre) to Ventura County's overall decline in Farmland would be a cumulatively considerable contribution to an existing significant impact.

6-5 Under the heading **6.4.2 Agriculture Resources**, Mitigation Measure 4.2-1 has been revised as follows:

Mitigation Measure <u>6-1</u>4.2-1: SCE shall obtain agricultural conservation easements, as defined under Civil Code section 815 *et seq*, at a one to one (1:1) ratio for each acre of Farmland that is permanently converted by the Proposed Project...

Significance after Mitigation: Less than Significant.

6-8 *To be consistent with Draft EIR Section 4.4, the second sentence of the second paragraph has been modified as follows:*

Such losses would occur at the proposed Presidential Substation site (about 3.5 acres of coastal sage scrub habitat) with small permanent habitat impacts associated with Alternative Subtransmission Alignment 2 to accommodate pole footprints and temporarily habitat impacts during pole installation.

6-8 To be consistent with Draft EIR Section 4.4, the first sentence of the final paragraph on page 6-8 has been modified as follows:

The loss of <u>about</u> 3.5 acres of coastal sage scrub habitat under the Proposed Project would occur in an area that is separate and distinct from other coastal sage scrub areas and designated critical habitat for <u>Coastal_coastal_California gnatcatcher.-Based</u> on the absence of breeding observations during protocol level surveys, it is reasonable to conclude that the Presidential Substation site does not provide breeding habitat for this species. This site may serve as open space that potentially links nearby natural areas, including designated critical habitat for the coastal California gnatcatcher that occurs north of the site. The potential use of adjacent natural lands as a linkage corridor to other nearby natural lands would remain intact during the operations phase of the Proposed Project due to the large amount open space in the surrounding region. Given the demonstrated absence of site use by gnatcatchers and large amount of surrounding habitat for this species within designated critical habitat, the Proposed Project impact to coastal sage scrub habitat and the coastal California gnatcatcher is considered less than cumulatively considerable.

Protocol-level surveys were performed in this area in 2008, 2010 and 2012, and gnatcatchers were observed on and adjacent to the site. Based on these findings, it was determined that coastal California gnatcatchers could breed on or adjacent to the Proposed Presidential Substation. Protocol-level surveys for coastal California gnatcatcher surveys also considered the proposed subtransmission alignment and a gnatcatcher pair was detected on this alignment as well. Based on these findings, the USFWS may require formal consultation for coastal California gnatcatcher impacts and coastal sage scrub habitat losses under the FESA.

The implementation of Mitigation Measure 4.4.-2b would reduce impacts to Coastal California gnatcatcher to less than significant. Therefore, the Proposed Project impact to coastal sage scrub habitat and the coastal California gnatcatcher is considered less than cumulatively considerable.

The Proposed <u>ProjectPresidential Substation</u> would impact approximately 0.05 acre of seasonal wetlands and associated habitat under the jurisdiction of CDFG and 0.04 acre of isolated waters under the jurisdiction of the RWQCB and Corps. <u>The</u> <u>subtransmission line for the Proposed Project would impact approximately</u> 0.032 acre of "Waters of the U.S" along Sunset Valley Road and approximately 0.004 acre along Tierra Rejada Road. In addition, approximately 0.03 acre of waters under the jurisdiction of the CDFG would be impacted along Sunset Valley Road. The affected drainage is considered to have marginal habitat value and does not support any special-status plants or wildlife species.

6-15 *The source at the bottom of Table 6-1 has been modified as follows:*

SOURCE: ESA, 2011 City of Simi Valley, 2008; City of Thousand Oaks, 2009; County of Ventura, 2009

6-15 Under **References- CEQA Statutory Sections**, the following references have been added as follows:

<u>City of Simi Valley, 2008. Summary of Residential Development: Fourth Quarter</u> <u>2008 City of Thousand Oaks, 2009. Current Planning Development Projects,</u> <u>City of Thousand Oaks, Community Development Department, May 2009</u> (project status through April 30, 2009).

<u>City of Thousand Oaks, 2009. City of Thousand Oaks Current Planning</u> <u>Development Projects, Project Status Through April 30, 2009. May 2009.</u>

County of Ventura, 2009. Pending Projects List; Recently Approved Projects List, as of April 30, 2009.

Chapter 7. Report Preparers

There are no text changes in this section.

Presidential Substation Project A.08-12-023) Final Environmental Impact Report
Chapter 8. Mitigation Monitoring, Reporting, and Compliance Program

All text changes to Chapter 8, *Mitigation Monitoring, Reporting, and Compliance Program*, are shown in Appendix J of the Final EIR Document.