

ITEM 9.A.

MOORPARK CITY COUNCIL AGENDA REPORT

TO: Honorable City Council

FROM: David A. Bobardt, Community Development Director
By: Joseph R. Vacca, Principal Planner  

DATE: October 4, 2011 (CC Meeting of 10/19/11)

SUBJECT: Consider Draft Environmental Impact Report (EIR) for the Proposed Southern California Edison Presidential Substation Project and Utilities, Located within Various Rights of Ways in the County of Ventura, and the Cities of Simi Valley and Thousand Oaks

BACKGROUND

The Presidential Substation project is proposed by Southern California Edison, (SCE) who filed an application with the California Public Utilities Commission, (CPUC) in December of 2008, requesting approval to construct a new 66/16 kilovolt substation in the city of Thousand Oaks and a 3.5 mile 66 kilovolt subtransmission line route. The unstaffed, low-profile distribution substation would allow high-voltage electricity (66 kilovolts) to be reduced to a lower voltage (16 kilovolts) so that it could be distributed for use in homes and businesses. The project also would include construction of two new overhead subtransmission lines entering the new substation. They would connect to two existing subtransmission lines in order to supply electrical power for the new substation.

On February 17, 2009, the CPUC distributed a Notice of Preparation to advise interested parties that an EIR would be prepared for the proposed project. Then, on August 25, 2010, the CPUC distributed a Noticing Letter to interested parties, stating that the project description for the proposed project had changed and that due to proposed changes and the length of time that passed since the initial scoping period, the CPUC conducted a 30-day supplemental scoping period.

The Community Development Department reviewed both the original and revised project plans, and provided comments to the CPUC, generally outlined as follows:

- On March 17, 2009 via e-mail, staff expressed concerns that the new transmission lines through Tierra Rejada Valley would be visible to residents in the Serenata neighborhood and to travelers along Tierra Rejada Road in Moorpark, that the City had recently made a substantial investment in enhanced landscaping along Tierra Rejada Road and that the new steel poles would be a dominant feature of the landscape.
- On December 22, 2009, a letter from the Mayors of Moorpark, Simi Valley, and Thousand Oaks was provided 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.
- On September 24, 2010, staff mailed a comment letter to the environmental project manager, (Attachment 1) indicating that the EIR needs to fully explore two alternatives including full undergrounding and an alternative route following existing lines west of the Tierra Rejada Valley, along with providing more detail on the pole sizes.

DISCUSSION

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. The Electrical Needs Area (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) (ENA substations) provide electrical service to approximately 60,000 metered customers and are presently at or near their operating capacity. Therefore, SCE is proposing to construct a new 66/16 kV substation to meet the electrical needs and be operational by the Spring or Summer of 2013, (Attachment 2).

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. One above-ground connection is proposed along Sunset Valley Road travelling north-south from the intersection with Tierra Rejada Road to Read Road. The second above ground connection is to be along Read Road, travelling east-west from Moorpark Road to the proposed substation at Olsen Road. The only section proposed to be underground is where the utility line's cross the State Route 23 Freeway, (Attachment 3). 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 utility connections travel above ground on new poles, replacing wood poles with either light weight steel poles, (LWS) or tubular steel poles (TSP). The LWS poles can range in height from 61' to 75', with a 1.5' to 2' wide pole diameter at the base. The TSP poles can range in height from 60' to 100', with a 2'

to 4' wide pole diameter at the base. In the Moorpark ROW along Tierra Rejada Road in the vicinity of the intersection with Sunset Valley Road, there are three wood/guy poles between 29' and 75' in height proposed for replacement. The new replacement poles in this area are proposed to consist of three LWS poles between 61' and 75' in height and one TSP between 60' and 100' in height, all proposed along the south side of Tierra Rejada Road. The proposed Presidential Substation, an unstaffed and automated, 56 megavolt, 66/16 kV low-profile distribution substation, would be constructed on a 4-acre site within a 5.4-acre ROW or acquired property, proposed south of Olsen Road, in the City of Thousand Oaks near its eastern boundary with the City of Simi Valley.

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

According to SCE, construction of the project is needed to maintain safe and reliable electric service to customers and to serve forecasted electrical demand in the electric needs area. As part of the project review and approval process for the proposed project, SCE must submit a Permit to Construct application to the CPUC for approval. The CPUC is the state regulatory agency that sets electricity rates and issues permits for the construction of certain electric facilities. SCE's application will include an EIR to evaluate the environmental impacts of the proposed project. The CPUC will review the application in accordance with CEQA and either approve the project as filed, approve the project with modifications or deny the project.

The Draft EIR has identified that the proposed project will result in permanent significant and unavoidable impacts to aesthetics, as well as temporary significant and unavoidable impacts to air quality and noise, during project construction. There are eight alternatives analyzed in the Draft EIR, as options to consider instead of employing the Proposed Presidential Substation site and proposed alignment of above ground utility lines on Sunset Valley Road and Read Road, and under SR 23. The alternatives are generally depicted on Attachment 3. All proposed alternatives include above-ground subtransmission poles and wiring, and have also been determined to create significant and unavoidable impacts except System Alternative B.

In reviewing the Draft EIR, staff believes the draft has not adequately addressed the City's comments raised during scoping. Staff 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 Draft EIR because impacts to air quality, and noise resources would increase and an additional potentially significant cultural resources impact would occur. In addition, the Draft EIR states that 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. Staff is recommending that the EIR include Alternative Subtransmission Alignment 4 as an alternative and analyze in more detail its potential for reducing long range aesthetics impacts on the Tierra Rejada Valley. During scoping, staff 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 above-ground line. This requested alternative was not evaluated in the EIR, even though staff believes it may show a significant reduction in project impacts to the Tierra Rejada Valley, thereby improving the decision-making process on this project as a reasonable alternative.

In addition, 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. Staff 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.

In the City's response to the latest scoping letter, staff also raised issues of pole sizing as an area of concern. 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 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 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.

With respect to the visual impact analysis, 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. Staff is recommending use of 11" x 17" pull-out photo simulations in the EIR, which may improve the visual quality for comparison because the existing photo simulations understate the visual impacts.

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.

System Alternative B is the Environmentally Superior Alternative. This alternative would not result in any significant unavoidable impacts, does not involve the construction of a new substation and would meet most of the basic project objectives but, the Draft EIR indicates it 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. In light of the visual impacts to Moorpark from all other alternatives, staff supports the Environmentally Superior Alternative, System Alternative B, as the only option for adequately addressing environmental impacts as presented in the Draft EIR, and recommends that this Alternative be analyzed in greater detail in the EIR so decision makers have a real understanding of whether or not this alternative meets project objectives sufficiently to be feasible

Staff has contacted Mark Towne, Deputy Director / City Planner, Community Development, Thousand Oaks and Lauren Funaiole, Environmental Planner, Planning Division of the Department of Environmental Services of Simi Valley to ascertain their conclusions on review of the Draft EIR. Both parties indicated that the Draft EIR failed to adequately address concerns raised by their respective cities during the Notice of Preparation process. Furthermore, both staff members concluded that while it may be premature to recommend an alternative at this time, the Environmentally Superior Alternative, System Alternative B seems to be the preferred alternative of staff from both agencies at this time.

FISCAL IMPACT

None

STAFF RECOMMENDATION

Direct staff to provide a comment letter, (Attachment 4) to the Environmental Project Manager to address the unresolved issues in the Draft Environmental Impact Report, and provide preliminary support for System Alternative B as outlined in the Draft EIR.

ATTACHMENTS:

1. Staff comment letter responding to Notice of Preparation, Dated September 24, 2010, (with attachments)
2. Executive Summary of the Draft EIR, dated September 2011
3. Draft EIR Figure ES-2, Alternative Subtransmission Alignments
4. DRAFT staff comment letter on Presidential Substation project, October __, 2011



City of Moorpark

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.

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JANICE S. PARVIN
Mayor

ROSEANN MIKOS
Mayor Pro Tem

KEITH F. MILLHOUSE
Councilmember

DAVID POLLOCK
Councilmember

MARK VAN DAM
Councilmember

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Bobardt". The signature is fluid and cursive, with a large, sweeping flourish at the end.

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

Presidential Substation Project

From: David Bobardt [dbobardt@ci.moorpark.ca.us] **Sent:** Tue 3/17/2009 6:01 PM
To: Presidential Substation Project
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 be analyzed and mitigation needs to be identified in the Draft EIR.
2. The exact location of the substation was not clear from the exhibits on the project website. The City is requesting a 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
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December 22, 2009

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

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.

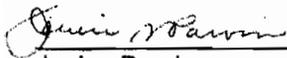
This joint letter has therefore been prepared in order to underscore the importance of undergrounding any proposed transmission lines in the area of the Tierra Rejada Valley Greenbelt, and is consistent with previous requests by all three cities to underground

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,



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

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EXECUTIVE SUMMARY

ES.1 Introduction / Background

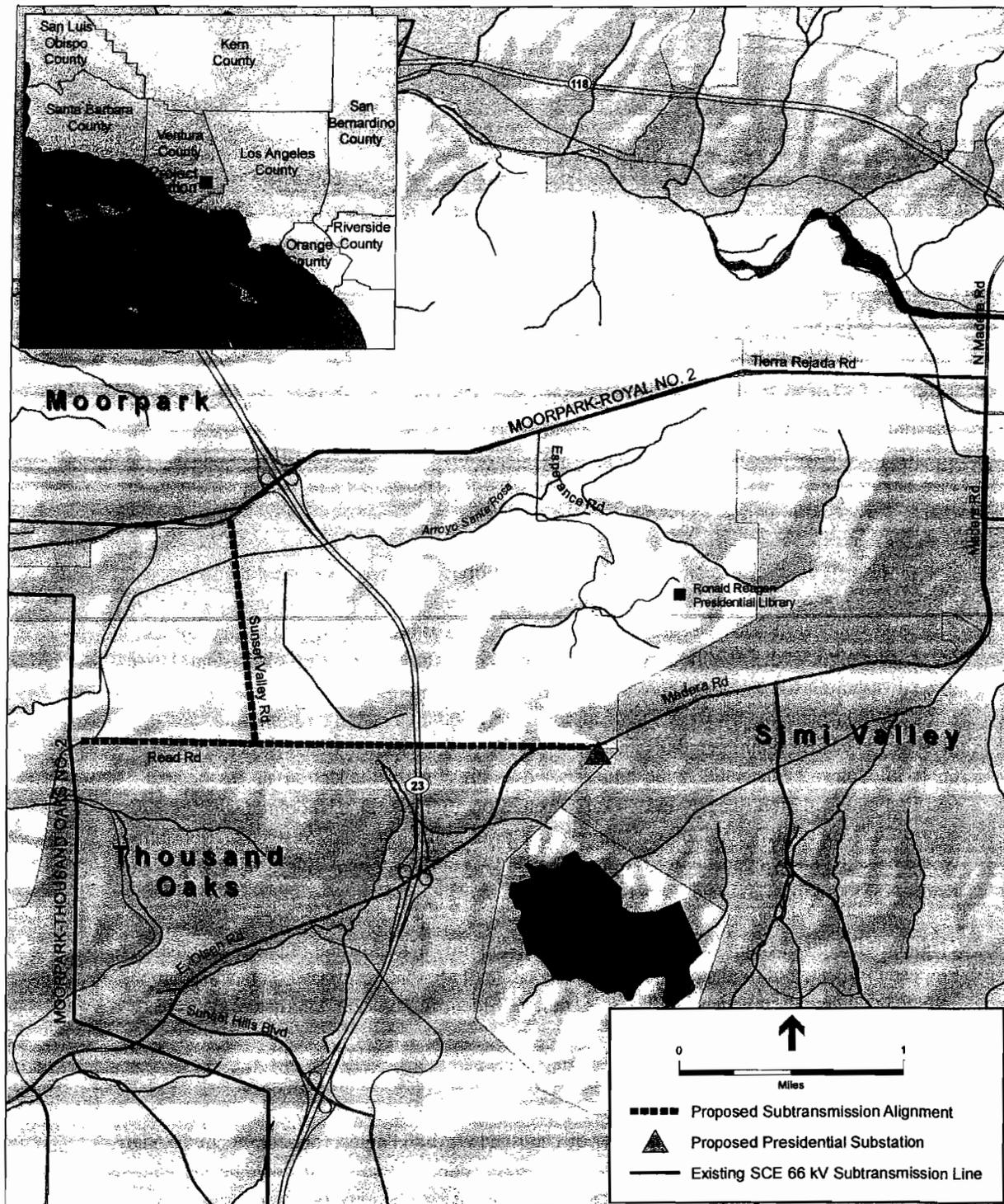
Southern California Edison (SCE), in its California Public Utilities Commission (CPUC) application for the Presidential Substation Project (Proposed Project) (A.08-12-023), filed on December 22, 2008, seeks a Permit to Construct (PTC), to construct, operate and maintain electrical facilities pursuant to CPUC General Order (GO) 131-D. The application includes the Proponent's Environmental Assessment (PEA) (SCE, 2008) prepared pursuant to Rule 2.4 of CPUC's Rules of Practice and Procedure.

The purpose of the Presidential Substation Project (Proposed 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 Proposed Project would construct a new 66/16 kilovolt (kV) distribution substation (proposed Presidential Substation) and associated 66 kV subtransmission lines (proposed subtransmission alignments), telecommunications connection, and related distribution components. Power to the proposed Presidential Substation would be supplied by connecting to two existing 66 kV subtransmission lines, Moorpark-Royal No.2 and Moorpark-Thousand Oaks No. 2.

This Draft EIR has been prepared to consider the potential environmental impacts from the Proposed Project, and to identify and evaluate a range of alternatives. Based on this evaluation and the documentation which follows, this Draft EIR identifies System Alternative B as the Environmentally Superior Alternative.

ES.1.1 Proposed Project

The Proposed Project is located in the City of Thousand Oaks and unincorporated Ventura County, California. As depicted in **Figure ES-1** 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-



SOURCE: SCE, 2011

Presidential Substation Project . 207584.02

Figure ES-1
Proposed Project Overview

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.

The Proposed Project includes 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.

SCE's Proposed Project Objectives

The objectives of the Proposed Project are defined by SCE in its PEA (SCE, 2008). This EIR does not adopt or endorse the objectives that SCE has defined for its Proposed Project. SCE's defined objectives are presented below.

- Meet long term electrical demand requirements in the ENA beginning in 2011 and extending beyond 2014 in order to meet 10-year planning criterion;
- 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.

**TABLE ES-1
SUMMARY OF PROPOSED PROJECT COMPONENTS**

Construction of a new 66/16 kV low-profile distribution substation (Proposed Presidential Substation) on an approximate four-acre site

- Install one 66 kV switchrack
- Install five 66 kV circuit breakers and disconnect switches
- Install two 28 MVA, 66/16 kV transformers
- Install two 16 kV, 4.8 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 underground 16 kV distribution getaways
- Install lighting
- Construct one Mechanical and Electrical Equipment Room (MEER)
- Construct perimeter wall and gate
- 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 ROW (25 TSPs, of which two are already described in the substation section above, and 41 light weight circular 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 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 ROW
- Construct new access roads or improve existing roads for construction and maintenance of subtransmission facilities.

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.

**TABLE ES-1 (Continued)
SUMMARY OF PROPOSED PROJECT COMPONENTS**

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

- Install telecommunication line (i.e. fiber optic cable) from the Moorpark-Thousand Oaks No. 2 66 kV Subtransmission Line to approximately Sunset Valley Road.
- Install underground telecommunications facilities with the 16 kV distribution lines from approximately Sunset Valley Road to proposed Presidential Substation.
- Install underground telecommunication lines at the intersections of Moorpark Road, and Read Road, and also at Sunset Valley Road and Tierra Rejada Road to follow the 16 kV distribution pathway.

SOURCE: SCE, 2008b, 2010

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 proponents application and PEA (SCE 2008); 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.

One method of meeting long term electrical demand requirements within the ENA would include the construction of a new substation. In order for the CEQA team to consider alternatives involving the construction, operation and maintenance of a new substation it further defined “operational flexibility” and “reliability” requirements using the additional data provided by SCE and independently assessed. The CEQA team determined that to be considered for further analysis an alternative substation site would have to meet the following objectives of the Proposed Project.

- Be capable of being served from two separate 66 kV lines.
- Be located such that at least two of the 16 kV distribution circuits can easily interconnect with circuits from adjacent substations.
- Be capable of ultimately providing 12 to 16, 16 kV distribution circuits.

ES.1.2 Summary of Public Involvement Activities

- On February 17, 2009, the CPUC published and distributed a Notice of Preparation (NOP) to advise interested local, regional, and State agencies, and interested public, that an EIR would be prepared for the Proposed Project, and included information about a public scoping meeting.
- On Tuesday, March 3, 2009 at 6:30 pm the CPUC held an educational workshop and public scoping meeting in the cafeteria of the Park Oak Elementary School, located at 1335 Calle Bouganvilla, Thousand Oaks, California.
- On Tuesday, March 3, 2009 following the educational workshop
- Due to the changes in the Proposed Project design and the length of time that passed since the initial scoping period, the CPUC conducted a 30-day supplemental scoping period. The CPUC provided several public notices for the supplemental scoping process. On Wednesday, August 25, 2010; the CPUC published and distributed a Noticing Letter to interested local, regional, and State agencies, and the public, stating that the Project Description for the Proposed Project had changed (Appendix A).
- On Tuesday, September 14, 2010, from 6:30 p.m. to 8:30 pm the CPUC conducted a supplemental scoping meeting in a meeting room at the Palm Garden Hotel, at 495 N. Ventu Park Road, Thousand Oaks, California.

ES.1.3 Areas of Controversy / Public Scoping Issues

Private citizens, homeowners, and local businesses provided the majority of the comments during the scoping process. In addition, comments were received from the following organizations and government agencies:

- California Department of Fish and Game
- Center for Biological Diversity
- City of Moorpark
- City of Simi Valley
- City of Thousand Oaks
- Deer Creek Community Association
- Department of the Interior, National Park Service/Santa Monica Mountains National Recreation Area
- Native American Heritage Commission
- Santa Monica Mountains Conservancy
- Sunset Hills Homeowners Association
- Rancho Madera Homeowners Association
- Underwood Family Farms
- United States Fish and Wildlife Service
- Ventura County Air Pollution Control District

- Ventura County Department of Public Work and Transportation
- Ventura County Integrated Waste Management Division
- Ventura County Planning Division
- Ventura County Resource Management Agency
- Ventura County Watershed Protection District

The Scoping Reports in Appendix A include all comments and describe which comments are not within the scope of CEQA. The overarching themes in the written and oral comments received are as follows:

- Impacts on scenic views, especially along eligible and designated-scenic Ventura County and city roadways
- Impacts from loss of agricultural land;
- Impacts to air quality from earth disturbance and removal of vegetation;
- Impacts to wildlife and plant life;
- Impacts of greenhouse gas emissions on climate change;
- Impacts to known cultural resources;
- Impacts to water quality and water runoff in the project area;
- Impacts to the surrounding land uses;
- Noise impacts from operation of the transmission lines;
- Impacts to population and housing;
- Impacts on public services and recreation;
- Impacts to the transportation systems and traffic safety;
- Cumulative impacts;
- Ensuring that alternatives are adequately addressed; and,
- Ensuring that perceived inadequacies in the PEA will not be repeated.

ES.2 Alternatives

Alternatives to SCE's Proposed Project are identified and evaluated in accordance with CEQA Guidelines. CEQA Guidelines (§15126(a)) state:

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.

CEQA Guidelines (§15364) define feasibility 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.

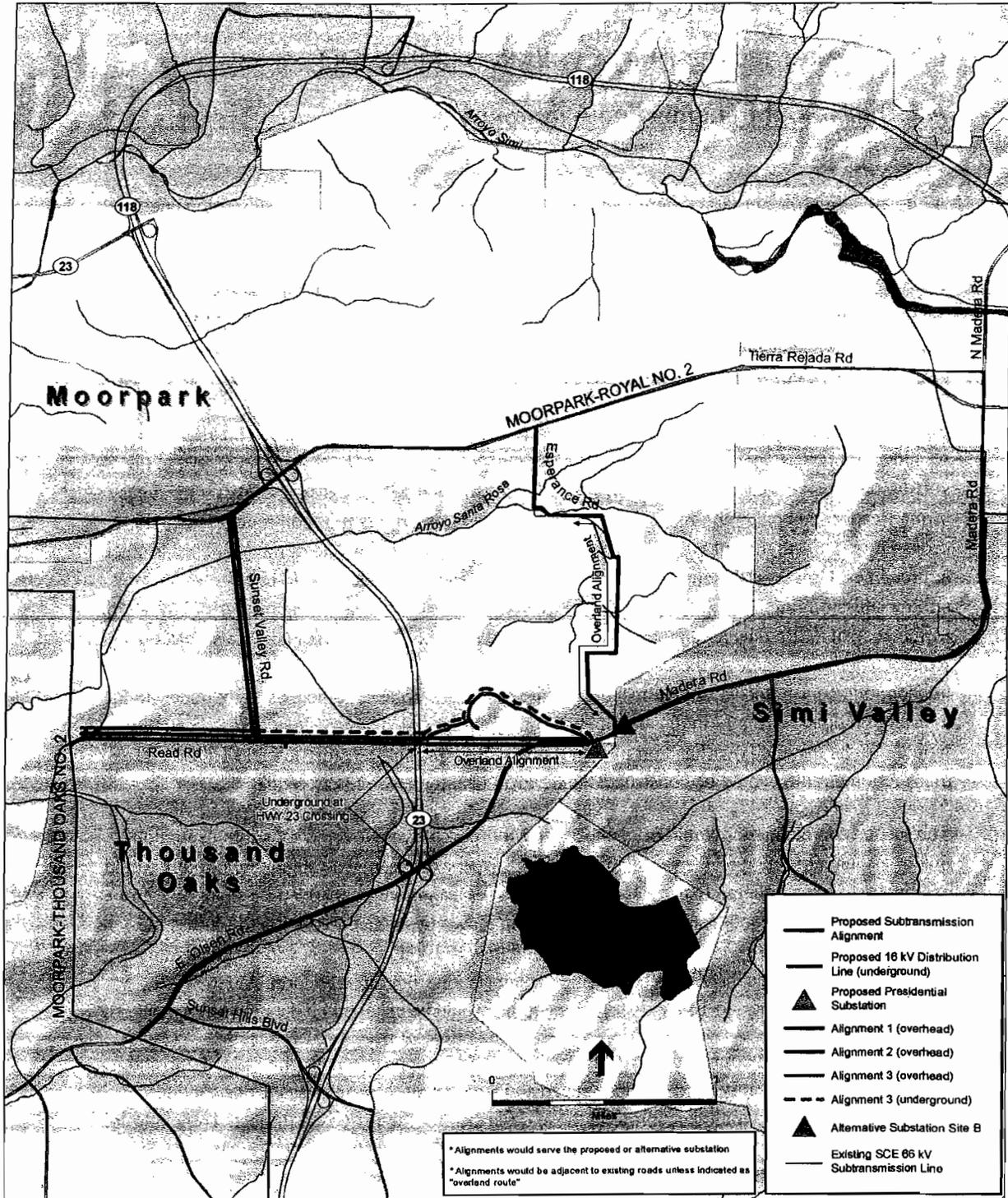
Alternatives to the Proposed Project were presented by SCE in its PEA and or developed by the CEQA Team. Particular emphasis was placed on developing feasible alternatives which would reduce impacts to Aesthetics, Noise, and Air Quality.

In total, the alternatives screening process has culminated in the identification and screening of approximately five potential alternatives for SCE's Proposed Project (not including combinations of alternative components): three alternative subtransmission alignments including a partial undergrounding alternative, one alternative substation site, and one system alternative that would upgrade existing substations.

Alternatives to the Proposed Project were screened according to CEQA guidelines to determine those alternatives to carry forward for analysis in the EIR and alternatives to eliminate from detailed consideration. The alternatives were primarily evaluated according to: (1) whether they would meet most of the basic project objectives; (2) whether they would be feasible considering legal, regulatory and technical constraints; and (3) whether they have the potential to substantially lessen any of the significant effects of the Proposed Project.¹ Other factors considered, in accordance with CEQA Guidelines (CEQA Guidelines §15126.6(f)), were site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries, and proponent's control over alternative sites. Economic factors or costs of the alternatives (beyond economically feasible) were not considered in the screening of alternatives since CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of project objectives or would be more costly" (CEQA Guidelines §15126.6(b)).

The detailed results of the alternatives screening analysis are contained in Chapter 3 of the EIR. Provided below are summary descriptions of the alternatives which meet the basic project objectives, lessen significant impacts, and are feasible, and were therefore carried forward for further analysis. **Figure ES-2** illustrates the general alignment of the three alternatives compared to the Proposed Project, as well as the location of the alternative substation site. Section 3.5, *Alternatives Eliminated from Full EIR Evaluation*, provides information related to other alternatives considered and the rationale for elimination from further consideration.

¹ At the screening stage, it is neither possible nor legally required to evaluate all of the impacts of the alternatives 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.



SOURCE: SCE, 2010

Presidential Substation Project . 207584.02
Figure ES-2
 Alternative Subtransmission Alignments

ES.2.1 Alternatives Fully Evaluated in this EIR

Alternative Subtransmission Alignment 1

Description

Alternative Subtransmission Alignment 1 would be capable of serving a new substation at either the proposed Presidential Substation site or the Alternative Substation Site B (with minor alignment modifications in the vicinity of the substation).

The first source line would consist of a single-circuit subtransmission line originating 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 alignment would extend east along the south side of Read Road within the City of Thousand Oaks along an existing 16 kV distribution circuit past the intersection of Read Road and Sunset Valley Road. The alignment would continue east along Read Road, crosses Hwy 23 (underground), and continue east to the substation site. Although the alignment would be constructed within existing ROW, some areas along Read Road could require additional overhang easement rights to accommodate the pole cross-arms. This alignment would be constructed in the same path as one of the Proposed Project source lines. However, the entire alignment would be constructed as a single-circuit subtransmission line. As a single-circuit, the line would be constructed using primarily LWS with limited use of TSPs. The pole types and locations between Moorpark Road and Sunset Valley Road would be the same as the Proposed Project. 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 new telecommunication line would also be installed overhead on the LWS poles. Both the subtransmission and 16 kV distribution circuits would be constructed underground at the Hwy 23 crossing.

The second source line for would originate at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Tierra Rejada Road and Esperance Road. The alignment initially 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. The alignment would terminate at the substation site entering the substation from directly north. A new telecommunication line and 16 kV distribution circuit would be installed on the new LWS poles.

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 Project. Trenching for the installation of 16 kV distribution lines along Read Road and east of Hwy 23 would not be required under this Alternative.

Rationale for Full Analysis

This alternative would meet the basic project objectives for both the proposed Presidential Substation site and the Alternative Substation Site B. It would also meet all legal, regulatory and

technical feasibility criteria. This alternative would lessen the level of impacts on noise and air quality but would result in new significant unavoidable impacts on aesthetics.

Alternative Subtransmission Alignment 2

Description

Alternative Subtransmission Alignment 2 would be capable of serving either the proposed Presidential Substation, or Alternative Substation Site B (with minor alignment modifications in the vicinity of the substation).

The first source line would originate at the Moorpark-Thousand Oaks No. 2 66 kV subtransmission line near the intersection of Olsen Road and Sunset Hills Boulevard in the City of Thousand Oaks, and follow Olsen Road, primarily on the north side to the substation.

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.

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. 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. Based on preliminary engineering, single-circuit subtransmission poles would be placed every 180 to 200 feet. Poles would be a combination of LWS and TSPs depending upon the structural needs of the location.

Construction and pole assembly would occur on existing adjacent paved roads (Madera Road and Olsen Road). No new access roads would be required for this alignment. Activities within or immediately adjacent to the roadway, could require temporary lane closure. Traffic management would be conducted in a manner similar to the Proposed Project. While conductor pulling and preparation of pull and tension sites would be similar to the Proposed Project. This alternative would require approximately 12 pull and tension sites. Similar to the proposed subtransmission alignment the pull and tension sites would be approximately 150 feet by 30 feet.

In total, Alternative Subtransmission Alignment 2 would be approximately 5 miles long and would be adjacent to land presently used for residential, commercial, public space, and open space purposes.

Rationale for Full Analysis

This alternative would meet the basic project objectives for both the proposed Presidential Substation site and the Alternative Substation Site B. It would also meet all legal, regulatory and technical feasibility criteria. This alternative would lessen the level of impacts on noise but would result in new significant unavoidable impacts on aesthetics.

Alternative Subtransmission Alignment 3

Description

Alternative Subtransmission Alignment 3 would construct two new 66 kV subtransmission source lines capable of serving either the proposed Presidential Substation site or Alternative Substation Site B (with minor alignment modifications in the vicinity of the substation). The origination points and general route would be the same as the Proposed Project. However, additional portions of Alternative Subtransmission Alignment 3 would be installed underground compared to the Proposed Project. In addition, some sections of the existing 16 kV distribution line would not need to be relocated and would instead remain in place on existing wooden poles.

The first source line would originate as a single-circuit overhead subtransmission line at the Moorpark-Thousand Oaks No. 2 66 kV subtransmission line near the intersection of Read Road and Moorpark Road. The alignment extends east overhead along Read Road to the intersection of Sunset Valley Road, similar to the Proposed Project. The second source subtransmission circuit would originate as a single-circuit overhead subtransmission line at the Moorpark-Royal No. 2 66 kV subtransmission line near the intersection of Tierra Rejada Road and Sunset Valley Road. The alignment extends southeast overhead along Sunset Valley Road to the intersection with Read Road, similar to the Proposed Project. Pole structures and construction methods would be the same as for the Proposed Project for these portions of the alignment. At the intersection of Sunset Valley Road and Read Road, a TSP riser pole would be installed and from that point east, a double-circuit subtransmission line would be installed underground within Read Road, north of the centerline to the new substation.

The double-circuit subtransmission line would continue east underneath Hwy 23 in the same manner as described for the Proposed Project. However, since the line would already be underground, TSP risers on the west and east sides of the bore would not be required.

Once the double-circuit subtransmission line reaches the east side of Hwy 23, the line would continue underground to the new substation. 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.

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.

Relocation of the existing 16 kV distribution line between Sunset Valley Road and the substation would not be required.

Rationale for Full Analysis

This alternative would meet the basic project objectives for both the proposed Presidential Substation site and the Alternative Substation Site B. It would also meet all legal, regulatory and

technical feasibility criteria. This alternative would lessen the level of impacts on noise and air quality and would eliminate significant impacts on aesthetic resources.

Alternative Substation Site B

Description

Alternative Substation Site B would construct a new 66/16 kV substation on an approximate 2.3-acre parcel of land located on the north site of Madera Road in the City of Simi Valley. Similar to the Proposed Project, this substation location is capable of being served by the proposed subtransmission alignment or Alternative Subtransmission Alignments 1, 2 or 3, with minor modifications. Unlike the proposed subtransmission alignment, the Alternative Substation, would not require crossing Olsen Road to connect to the substation. Instead, the alignment would continue on the north side of Olsen Road until reaching the Alternative Substation Site B.

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 lessen the level of impacts on noise and air quality and would eliminate significant impacts on aesthetic resources related to substation construction.

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.

No Project Alternative

Description

In addition to the alternative subtransmission alignments/substation described above, the EIR evaluates the No Project Alternative, in accordance with CEQA requirements. CEQA Guidelines [§15126.6(e)], state that the No Project Alternative must include (a) the assumption that conditions at the time of the Notice of Preparation (i.e., baseline environmental conditions) would not be changed since the Proposed Project would not be installed, and (b) the events or actions that would be reasonably expected to occur in the foreseeable future if the project were not approved.

Under this alternative, the Proposed Project would not be implemented and the basic project objectives would not be met.

ES.3 Proposed Project Impact Assessment

ES.3.1 Impact Assessment Methodology

The analysis of environmental impacts is based upon the environmental setting applicable to each resource/issue and the manner in which the construction, operation and maintenance of the Proposed Project or alternatives would affect the environmental setting and related resource conditions. In accordance with CEQA requirements and guidelines, the impact assessment methodology also considers the following three topics: (1) the regulatory setting, and evaluates whether the Proposed Project or alternatives would be consistent with adopted federal, State and Local regulations and guidelines, (2) growth-inducing impacts, and (3) cumulative impacts. Regulatory compliance issues are discussed in each resource/issue area section. The EIR document is organized according to the following major issue area categories:

- Aesthetics
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

In order to provide for a comprehensive and systematic evaluation of potential environmental consequences to the resource/issue areas, the environmental impact assessments for the Proposed Project and alternatives are based upon a classification system, with the following four associated definitions:

Class I: Significant impact; cannot be mitigated to a level that is not significant

Class II: Significant impact; can be mitigated to a level that is not significant

Class III: Adverse impact, less than significant

No Impact: No impact identified

ES.3.2 Applicant Proposed Measures

In the Proponent's Environmental Assessment (SCE, 2008) and subsequent data response (SCE, 2010), SCE identified the following applicant proposed measures (APMs) that would be implemented to avoid or reduce potential impacts from the Proposed Project.

- **APM-BIO-01: Minimize Impacts to Coastal Sage Scrub.** To the extent feasible, the Proposed Project would be designed to avoid or minimize impacts to coastal sage scrub. Mitigation measures and compensation for impacts to coastal sage scrub would be developed in consultation with USFWS and CDFG to reduce the impacts to less than significant.
- **APM-BIO-02: Minimize Impacts to Jurisdictional Drainages.** A jurisdictional drainage delineation would be conducted during Spring 2009 to describe and map the extent of resources under the jurisdiction of the USACE, the RWQCB, and/or the CDFG following the guidelines presented in the Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. As appropriate, SCE would secure a Streambed Alteration Agreement from the CDFG, and Clean Water Act §404 and 401 permits from the USACE and LARWQCB, respectively, prior to disturbing the jurisdictional drainage.
- **APM CUL-1: Cultural Resources Treatment Plan.** SCE will develop a Cultural Resources Treatment Plan that would define appropriate actions necessary to lessen or avoid potential impacts to sites CA-VEN-1571 and CA-VEN-744.
- **APM CUL-2: Installation of Geotextile Type Fabric along Access Road.** Prior to construction, SCE will address the drivability of the access road leading to site CA-VEN-744. In the event that the road is determined to be inadequate for transporting of equipment, SCE would design and implement the placement of geotextile-type fabric and fill soil along the road prior to access road usage. The placement of the geotextile-type fabric and fill soil would protect the archaeological site from potential impacts such as increased displacing of artifacts of the existing site surface due to vehicle traffic and road maintenance.
- **APM CUL-3: Capping of Archaeological Site on Potential Impact Areas.** Prior to installation of the subtransmission structure located at site CA-VEN-744, SCE will cap the portions of the site that have the potential to be impacted. To cap the site, SCE will place geotextile-type fabric on the surface of the archaeological site and then spread imported fill soil or other suitable material over the geotextile-type fabric. The capping will prevent future erosion of the site surface as a result of SCE's ingress and egress for maintenance and inspection activities. The archaeological site cap will not be removed after construction.
- **APM CUL-4: Construction of Earthen Pad.** SCE will install an earthen pad adjacent to the existing subtransmission structure location. The earthen pad is necessary to support heavy equipment required to install the subtransmission structure safely, while preserving archaeological site CA-VEN-744 from potential construction related impacts. The earthen pad area will be covered by geotextile-type fabric and then overlaid by "honey comb structure." The honey comb structure will be filled with imported fill soil. The earthen pad would not be removed after construction and will be utilized for maintenance activities.

- **APM CUL-5: Fencing of an Environmentally Sensitive Area.** SCE would install an Environmentally Sensitive Area (ESA) fence to protect portions of archaeological sites CA-VEN-744 and CA-VEN-1571 from potential impacts.
- **APM CUL-6: Native American Monitoring.** SCE will retain the services of a Chumash Native American representative to conduct monitoring activities during work carried out within sites CA-VEN-744 and CA-VEN-1571 and in their vicinity. The Native American representative will be present during any archaeological excavations and during project construction in those areas determined by SCE's project archaeologist as having the potential to contain archaeological resources.
- **APM CUL-7: Archaeological Monitoring.** A qualified archaeologist will be on site to monitor ground-disturbing activities within or in the vicinity of sites CA-VEN-744 and CA-VEN-1571. If archaeological resources were identified during construction activities, construction would be halted in that area and away from the discovery, until a qualified archaeologist assesses the significance of the resource. The archaeologist would recommend appropriate measures to record, preserve or recover the resources.
- **APM-PAL-01: Develop and Implement a Paleontological Monitoring Plan.** A project paleontologist meeting the qualifications established by the Society of Vertebrate Paleontologists shall be retained by SCE to develop and implement a Paleontological Monitoring Plan prior to the start of ground disturbing activities at the Proposed Project substation site. As part of the Paleontological Monitoring Plan, the project paleontologist shall establish a curation agreement with an accredited facility prior to the initiation of ground-disturbing activities. The Paleontological Monitoring Plan shall also include a final monitoring report. If fossils are identified, the final monitoring report shall contain an appropriate description of the fossils, treatment, and curation.
- **APM-PAL-02: Paleontological Monitoring.** A paleontological monitor shall be on site to observe ground-disturbing activities within the paleontologically sensitive formations at the Proposed Project substation site. If fossils are found during ground-disturbing activities, the paleontological monitor shall be empowered to halt the ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment.

ES.3.3 Mitigation Measures

The EIR describes feasible measures that could minimize significant adverse impacts (CEQA Guidelines §15226.4). Within each issue area, mitigation measures are recommended where environmental effects could be substantially minimized. The mitigation measures recommended by this study have been identified in the impact assessment sections of the EIR and are presented in Mitigation Monitoring, Reporting, and Compliance Program in Chapter 8.

ES.3.4 Findings

An overview of environmental impacts by resource area is provided below based on the detailed impact finding and mitigation measures for the Proposed Project and alternatives provided in Chapter 4, *Environmental Analysis*. Tables ES-4 and ES-5, at the end of this Executive Summary, provide a more detailed summary of all the environmental impacts and mitigation measures for the Proposed Project and alternatives.

Less than Significant and Less than Significant with Mitigation

For the Proposed Project and alternatives, based on technical review and evaluation against the environmental and regulatory setting, the following environmental impacts were determined to be less than significant or less than significant with mitigation (i.e., Class III and Class II, respectively).

- Agriculture Resources
- Biological Resources
- Cultural Resources
- Geology, Soils and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Significant Unavoidable

As summarized in **Table ES-2**, environmental impacts would be significant and unavoidable (Class I), even with implementation of feasible mitigation measures, in the following areas:

- Aesthetics (Proposed Project; Alternative Subtransmission Alignments 1 and 2)
- Air Quality (Proposed Project; Alternative Subtransmission Alignments 1, 2 and 3; Alternative Substation Site B)
- Noise (Proposed Project; Alternative Subtransmission Alignments 1 and 3)

ES.4 Summary Comparison of the Proposed Project and Alternatives

ES.4.1 Methodology

CEQA requires identification of an environmentally superior alternative, but does not provide specific direction regarding the methodology of alternatives comparison. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with long-term impacts (e.g., visual impacts and permanent loss of habitat/agricultural lands). Impacts associated with construction (i.e., temporary or short-term) or those that are easily mitigable to less than significant levels are considered to be less important.

The methodology used to compare alternatives in this EIR started with identification of alternatives. 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, one alternative substation site, and one system alternative. A No Project alternative was also identified. The second step required assessment of the environmental impacts of the Proposed Project and alternatives. The third step was the comparison of the impacts of each alternative to those of the Proposed Project to determine the environmentally superior alternative. The environmentally superior alternative was then compared to the No Project alternative.

**TABLE ES-2
SUMMARY OF SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL IMPACTS
OF THE PROPOSED PROJECT AND ALTERNATIVES BY COMPONENT**

Alternative	Significant (Class I) Impacts
Proposed Project – Includes both the proposed Presidential Substation and proposed subtransmission alignment	<p><i>Aesthetics – significant unavoidable:</i> The Proposed Project would result in significant unavoidable impacts to scenic resources and degradation of visual character and public views. Significant unavoidable impacts would result from both the substation construction and the proposed subtransmission line construction.</p> <p><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.</p> <p><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, 16kV distribution line and telecommunications cable and access road construction.</p>
Significant Impacts (Class I) Eliminated or Created by Alternatives	
Alternative Subtransmission Alignment 1	<p><i>Aesthetics – significant unavoidable:</i> Aesthetic impacts would be created on views from three equestrian centers and the Ronald Reagan Presidential Foundation and Ronald Reagan Presidential Library.</p> <p><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.</p> <p><i>Noise – significant unavoidable:</i> Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.</p>
Alternative Subtransmission Alignment 2	<p><i>Aesthetics – significant unavoidable:</i> 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).</p> <p><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.</p> <p><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.</p>
Alternative Subtransmission Alignment 3	<p><i>Aesthetics – less than significant:</i> The subtransmission crossing of Olsen Road would be installed underground reducing the visual impact to less than significant.</p> <p><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.</p> <p><i>Noise – significant unavoidable:</i> Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.</p>
Alternative Substation Site B	<p><i>Aesthetics – less than significant:</i> Elimination of eliminate Class I impacts related to aesthetic resources.</p> <p><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.</p> <p><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.</p>
System Alternative B	<p><i>Aesthetics – less than significant:</i> Class I aesthetic impacts would be eliminated.</p> <p><i>Air Quality – less than significant:</i> Construction impacts in Ventura County associated with potential violation of ozone air quality standards and cumulatively considerable levels of NOx.</p> <p><i>Noise – less than significant short-term construction impacts:</i> 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.</p>

Although this comparison focuses on the most important issue areas (e.g., aesthetic resources, air quality and noise), determining an environmentally superior alternative is difficult because of the many factors that must be balanced. While the EIR identifies an environmentally superior alternative, it is possible that the Commission could balance the importance of each impact area differently and reach a different conclusion.

ES.4.2 Summary of Significant (Class I) Unavoidable Impacts

As discussed above in Table ES-2, the Proposed Project would result in significant and unavoidable impact with respect to aesthetic resources, air quality and noise. 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.4.3 Environmentally Superior Alternative

The selection of an Environmentally Superior Alternative is based on differences in intensity and duration of significant impacts. 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 of the alternatives combinations are variations of alignments and/or new substation location. For a number of resources there are no material environmental impact differences between the Proposed Project and alternatives including: geology, soils, seismicity and mineral resources; hydrology/water quality; land use/ planning; population/ housing; and recreation.

Implementation of the Proposed Project and all seven of the alternative combinations would involve construction of a new substation that results in significant unavoidable (Class I) air quality impacts. Although air quality impacts would be of varying degrees with regard to NOx as an ozone precursor, each of the seven alternatives would still result in exceedences of the local threshold.

ES.4.4 Environmentally Superior Alternative vs. No Project Alternative

The Environmentally Superior Alternative (System Alternative B) would result in less-than-significant impacts on aesthetics, noise and air quality resources and would have 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.

ES.5 Impact Summary Tables

Table ES-3 on the following pages summarizes all identified impacts of the Proposed Project. The following information is presented: impact number, impact class (Class I, II, or III), applicable mitigation measure, and residual impact (if significant unavoidable). **Table ES-4** presents a summary of environmental impacts increased or decreased by each of the alternatives. The table (ES-4) focuses only on Aesthetics, Noise, and Air Quality since these are the only resources with significant unavoidable impacts under the Proposed Project. Impacts on all other resources are mitigable to less than significant.

**TABLE ES-3
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>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. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>Mitigation Measure 4.1-2a: For all structures that are visible from viewsheds where visual impacts are significant (i.e., Highway 23, Read Road, and Underwood Family Farms), 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.</p> <p>Mitigation Measure 4.1-2b: The subtransmission line conductors shall be non-specular and non-reflective and the insulators shall be non-reflective and non-reflective.</p>	<p>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.</p>
<p>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></p>	<p>Class I</p>	<p>Mitigation Measure 4.1-3a: Implement Mitigation Measure 4.1-2b.</p> <p>Mitigation Measure 4.1-3b: 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.</p> <p>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.</p>	<p>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.</p>
<p>Impact 4.1-5: Construction of the proposed Presidential Substation could result in a temporary adverse impact to visual quality. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>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.</p>	<p>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.</p>
<p>Impact 4.1-6: 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. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>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.</p>	<p>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.</p>

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant, unmitigable); Class III (less than significant, unmitigable); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>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 unavoidable</i></p>	<p>Class I</p>	<p>Mitigation Measure 4.1-8a: 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.</p>	<p>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.</p>
<p>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 significant with mitigation</i></p>	<p>Class II</p>	<p>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 Construction and Operation Lighting Mitigation Plan to 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 CPUC. The Plan shall include but is not limited to the following measures: Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to 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.</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Cumulative Impact: 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.</p>	Class II	<p>Mitigation Measure 4.2-Cumulative: SCE shall obtain agricultural conservation easements 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.</p>	
<p>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></p>	Class I	<p>Mitigation Measure 4.3-1: For off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles, SCE shall ensure achievement of a Project-wide fleet-average 20 percent NOx and 20 percent ROC reduction compared to the most recent CARB fleet average. A Construction Equipment NOx 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.</p>	Project construction activities would generate ozone precursor emissions that could contribute substantially to a violation of ozone air quality standards.
<p>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. <i>Less than significant with mitigation</i></p>	Class II	<p>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:</p> <ul style="list-style-type: none"> • 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. 	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant, unmitigable); Class III (less than significant, unmitigable); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Impact 4.3-2 (cont.)</p>		<ul style="list-style-type: none"> • 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. • 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. 	
<p>Impact 4.3-3: Construction activities would result in emissions of NOx that would be cumulatively considerable. <i>Significant unavoidable</i></p>	Class I	<p>Mitigation Measure 4.3-3: Implement Mitigation Measures 4.3-1 (Construction Equipment NOx Reductions) and 4.3-2 (Fugitive Dust Mitigation Plan);</p>	<p>Project construction activities would generate ozone precursor emissions that could contribute substantially to a violation of ozone air quality standards.</p>

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Impact 4.4-1: 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: Braunion's milk-vetch, Agoura Hills dudleya, Conejo dudleya, and Lyon's pentstemon as well as other non listed special-status species. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>Mitigation Measure 4.4-1: SCE and 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.</p>	<p>Significant Unavoidable Residual Impact</p>
<p>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></p>	<p>Class II</p>	<p>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.</p> <p>Mitigation Measure 4.4-2b: Where impacts to coastal sage scrub cannot be avoided (e.g. at the proposed Presidential Substation site), 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:</p> <ul style="list-style-type: none"> • Coastal sage scrub shall be restored at a 1:1 ratio in areas where it is temporarily disturbed. • A qualified ecologist shall prepare a restoration and mitigation plan in coordination with CDFG to mitigate for temporarily impacts to coastal sage scrub habitat. 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 transient and enhancement sites, success and performance criteria, and monitoring requirements, as well as measures to ensure long-term sustainability. 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). 	<p>Significant Unavoidable Residual Impact</p>

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant, unmitigable); Class III (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Impact 4.4-3: Construction activities may impact common or protected nesting migratory birds. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>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):</p> <p>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.</p>	
<p>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></p>	<p>Class II</p>	<p>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:</p> <ul style="list-style-type: none"> • Provide 60-inch minimum horizontal separation between energized conductors or energized conductors and grounded hardware; • Insulate hardware or conductors against simultaneous contact if adequate spacing is not possible; • Use pole designs that minimize impacts to birds, and; • Shield wires to minimize the effects from bird collisions. 	
<p>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></p>	<p>Class II</p>	<p>Mitigation Measure 4.4-2a and 4.4-2b, above.</p>	
<p>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></p>	<p>Class II</p>	<p>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. This includes minimizing the footprint during construction of poles for the proposed subtransmission line and spanning drainages that occur within the alignment.</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES
TABLE ES-3 (Continued)

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.4-6 (cont.)		<p>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.</p> <p>Mitigation Measure 4.4-6c: 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:</p> <ul style="list-style-type: none"> 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 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 mitigation</i>	Class II	<p>Mitigation Measure 4.5-1: 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</p>	

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**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Impact 4.5-1 (cont.)</p>		<p>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.</p> <p>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 during project implementation.</p>	
<p>Impact 4.5-2: Project construction could adversely impact a unique archaeological resource. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>Mitigation Measure 4.5-2a: 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.</p> <p>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.</p> <p>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. Selection of monitors shall be made from the Native American Heritage Commission list provided for the Project.</p> <p>Mitigation Measure 4.5-2b: If 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</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.5-2 (cont.)		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).	
Impact 4.5-3: The project could adversely affect unidentified paleontological resources. <i>Less than significant with mitigation</i>	Class II	<p>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 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; microscopic examination of samples where applicable; the evaluation, recovery, identification, and curation of fossils; and the preparation of a final mitigation report.</p> <p>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.</p>	
Impact 4.5-4: Project construction could result in damage to previously unidentified human remains. <i>Less than significant with mitigation</i>	Class II	<p>Mitigation Measure 4.5-4: If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work, 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 descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.</p>	

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**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
No Impacts		No Mitigation	
Impact 4.7-2: The Proposed Project could conflict with CARB's Climate Change Scoping Plan. <i>Less 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.	
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: <ul style="list-style-type: none"> • 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 also include a discussion of appropriate response actions in the event that hazardous materials are released or encountered during excavation activities. The plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.8-1 (cont.)		<ul style="list-style-type: none"> Hazardous Materials and Hazardous Waste Handling: A project operations-specific hazardous materials management and hazardous waste management program shall be developed prior to operations of proposed Presidential Substation project. The program shall outline proper hazardous materials use, storage, and disposal requirements, as well as hazardous waste management procedures. The program shall identify types of hazardous materials to be used at the proposed Presidential Substation project and the types of wastes that would be generated. All project 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. Transport of Hazardous Materials: 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 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. <p>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.</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.8-1 (cont.)		<p>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.</p> <p>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.</p>	
Impact 4.8-2: Project activities could release previously unidentified hazardous materials into the environment. <i>Less than significant with mitigation</i>	Class II	<p>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.</p>	
Impact 4.8-3: Project activities could release hazardous materials within the vicinity of an existing day care facility. <i>Less than significant with mitigation</i>	Class II	<p>Mitigation Measure 4.8-3: Implement Mitigation Measures 4.8-1a through 4.8-1e and 4.8-2.</p>	
Impact 4.8-4: The Proposed Project could result in a safety hazard for people working in the project area because a nearby private airstrip. <i>Less than significant with mitigation</i>	Class II	<p>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 CPUC.</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>Impact 4.8-5: Construction of the Proposed Project could interfere with an emergency response or evacuation plan. <i>Less than significant with mitigation</i></p>	Class II	<p>Mitigation Measure 4.8-5: Implement Mitigation Measures 4.15-1b and 4.13-2.</p>	
<p>Impact 4.8-6: Construction and maintenance-related activities could ignite dry vegetation and start a fire. <i>Less than significant with mitigation</i></p>	Class II	<p>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 GPUUC.</p>	
<p>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 than significant with mitigation</i></p>	Class II	<p>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:</p> <ul style="list-style-type: none"> • All access roads shall be 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 100 feet; 16 to 20 percent, cross-drain spacing shall be 75 feet; and 21 to 25 percent, cross-drain spacing shall be 50 feet; • 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. 	

¹ 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 Hagens, 1994).

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>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 significant with mitigation</i></p>	<p>Class II</p>	<p>Mitigation Measure 4.9-2: Regarding dewatering activities and discharges (if necessary), the following measures shall be implemented as part of Proposed Project construction:</p> <ul style="list-style-type: none"> • 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) of the groundwater to be discharged; this shall include analyzing the sample(s) for the constituents listed in the LARWQCB Dewatering General Permit, including TDS and nitrate. Further, the sample(s) shall be compared to the screening criteria listed in the LARWQCB Dewatering General Permit and the Basin Plan, and it shall be demonstrated that the discharge would not exceed any of the applicable water quality criteria or objectives. If necessary, SCE shall develop and submit to the LARWQCB a treatment plan and design. 	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>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 mitigation</i></p>	<p>Class II</p>	<p>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):</p> <ul style="list-style-type: none"> SCE shall implement a Retention BMP(s) (as defined in the Ventura County TGM [2010]) with a design volume of approximately 0.01 acre-feet. The drainage area to this feature shall comprise at least 0.17 acre of the proposed impervious surface area. 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. 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 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. 	<p>Significant Unavoidable Residual Impact</p>
<p>No Impacts</p>	<p>No Mitigation</p>	<p>No Mitigation</p>	<p>Significant Unavoidable Residual Impact</p>
<p>Impact 4.11-1: Construction activities would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria. <i>Significant unavoidable</i></p>	<p>Class I</p>	<p>Mitigation Measure 4.11-1a: SCE and/or its contractors shall develop a Construction Noise Reduction Plan. The Plan shall include, but not be limited to, the following measures for daytime construction activities:</p> <ul style="list-style-type: none"> 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. 	<p>Project construction activities would generate noise impacts on sensitive receptors at levels that would violate standards.</p>

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.11-1 (cont.)		<ul style="list-style-type: none"> • 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 featuring a solid panel and a weather-protected, sound-absorptive material on the construction-activity side of the noise shield. Shields used during linear construction activities shall be readily removable and moveable so that they may be repositioned, as necessary, to provide noise abatement for construction activities located near residential receptors. <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • 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. 	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.11-1 (cont.)		<ul style="list-style-type: none"> 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: Construction activities could increase ambient noise levels in Thousand Oaks and Simi Valley. <i>Less than Significant with Mitigation</i>	Class II	Mitigation Measure 4.11-4: Implement Mitigation Measures 4.11-1a and 4.11-1b.	
No Impacts		No Mitigation	
No Impacts		No Mitigation	
No Impacts		No Mitigation	
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 significant with mitigation</i>	Class II	<p>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 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.</p> <p>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:</p> <ul style="list-style-type: none"> 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; 	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
Impact 4.15-1 (cont.)		<ul style="list-style-type: none"> 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. <p>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.</p> <p>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 to the CPUC. This multi-agency 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.</p>	

^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-3 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR THE ALTERNATIVE ROUTES**

Impact	Impact Class ^a	Mitigation Measure(s)	Significant Unavoidable Residual Impact
<p>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></p>	<p>Class II</p>	<p>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.</p>	<p>[Redacted]</p>
<p>Impact 4.15-4: The Proposed Project would not result in inadequate emergency access. <i>Less than significant with mitigation</i></p>	<p>Class II</p>	<p>Mitigation Measure 4.15-4: Implement Mitigation Measure 4.15-1b.</p>	<p>[Redacted]</p>
<p>Impact 4.15-5: 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></p>	<p>Class II</p>	<p>Mitigation Measure 4.15-5: Implement Mitigation Measure 4.15-1c.</p>	<p>[Redacted]</p>
<p>No Impacts</p>		<p>No Mitigation</p>	<p>[Redacted]</p>

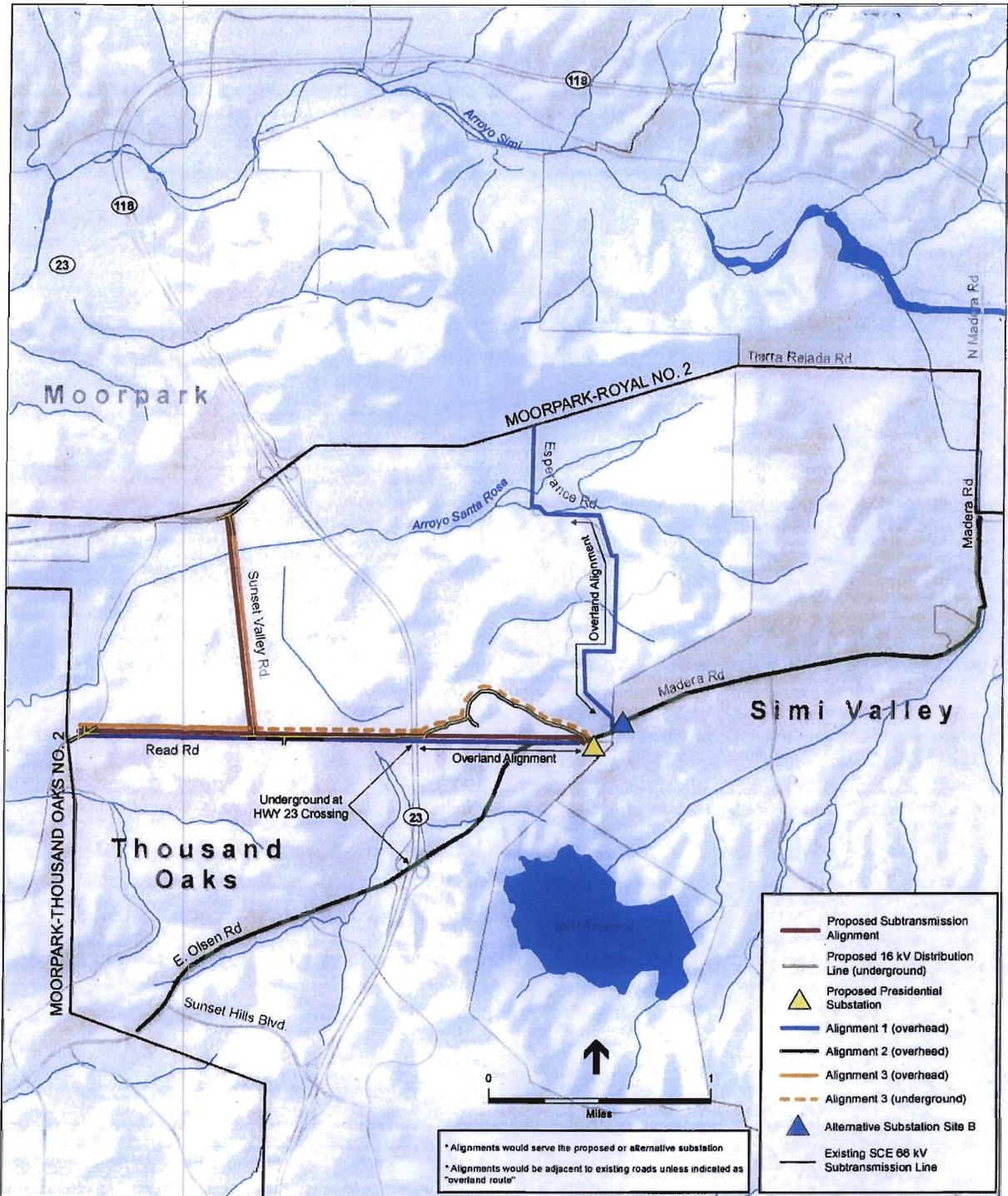
^a **Impact Classes:** Class I (significant, unmitigable); Class II (less than significant with mitigation incorporated); Class III (less than significant); Class IV (beneficial)

**TABLE ES-4
ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE**

Alternative	Aesthetics	Air Quality	Noise
Proposed Project	Significant unavoidable impacts related to Subtransmission Alignment Olsen Road crossing and also the Proposed Presidential Substation.	Significant unavoidable impacts related to construction emissions.	Significant unavoidable short term impacts where construction occurs near residences in unincorporated Ventura County.
Proposed Presidential Substation with Alternative Subtransmission Alignment 1	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.	Alternative would not include construction of 12,500 feet of duct bank but would require a longer subtransmission alignment and more pole construction. Overall, construction emission would be slightly reduced.	Alternative would result noise impacts in new areas in addition to the Proposed Project. Impacts may be slightly reduced in some areas.
Proposed Presidential Substation with Alternative Subtransmission Alignment 2	Alternative would have similar impacts as the Proposed Project. In addition, new significant aesthetics impacts would result from the alignment adjacent to Olsen and Madera Roads.	Alternative would not include construction of 12,500 feet of duct bank but would require a longer subtransmission alignment and more pole construction. Overall, construction emission would be slightly reduced.	Impacts would be similar to the Proposed Project but because of jurisdictional boundaries would be less than significant.
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 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.
Alternative Substation Site B with Proposed Project Subtransmission Alignment.	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.	Construction of the alternative substation would require fewer truck haul trips and grading resulting in reduced construction emissions. Construction emissions associated with subtransmission alignment construction would be similar to the Proposed Project. Overall, construction emissions would be reduced.	
Alternative Substation Site B with Alternative Subtransmission Alignment 1.	Alternative would eliminate the aesthetics impacts related to the substation site and the Olsen road overhead crossing. However, a new significant unavoidable impact would be created related to the Esperance Road alignment.	Alternative would eliminate construction emissions associated with 12,500 feet of duct bank construction but would require a longer subtransmission alignment and more pole replacement. Substation construction is expected to require fewer truck haul trips. Overall construction emissions would be reduced.	
Alternative Substation Site B with Alternative Subtransmission Alignment 2.	Alternative would eliminate the aesthetics impacts related to the substation site and the Olsen road overhead crossing. However, a new significant unavoidable impact would be created related to the new subtransmission lines parallel to Olsen and Madera Roads.	Alternative would eliminate construction emissions associated with 12,500 feet of duct bank construction but would require a longer subtransmission alignment and more pole replacement. Substation construction is expected to require fewer truck haul trips. Overall construction emissions would be reduced.	

TABLE ES-4 (Continued)
ENVIRONMENTAL IMPACTS INCREASED OR DECREASED BY IMPLEMENTING AN ALTERNATIVE

Alternative	Aesthetics	Air Quality	Noise
Alternative Substation Site B with Alternative Subtransmission Alignment 3.	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 eliminate construction emissions associated with access road construction and subtransmission alignment construction/pole replacement from Sunset Valley to the substation. In addition, the substation construction would involve less fill and therefore fewer truck haul trips. 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.
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.



SOURCE: SCE, 2010

Presidential Substation Project . 207584.02
Figure ES-2
 Alternative Subtransmission Alignments



City of Moorpark

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 __, 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:

1. The draft has not adequately addressed our comments raised during scoping, the 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 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 above-ground 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.

CC ATTACHMENT 4

JANICE S. PARVIN
Mayor

KEITH F. MILLHOUSE
Mayor Pro Tem

ROSEANN MIKOS, Ph.D.
Councilmember

DAVID POLLOCK
Councilmember

MARK VAN DAM
Councilmember

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 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. Therefore, 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, staff supports the environmentally superior alternative: System Alternative B. While the Draft EIR indicates that this alternative 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. It goes on to state that this Alternative would result in reduced operational flexibility and reliability and this should be analyzed in greater detail so decision makers have a real understanding of whether or not this alternative meets project objectives and is feasible.

5. 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 jvacca@ci.moorpark.ca.us.

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