Decision **PROPOSED DECISION OF ALJ YACKNIN (Mailed 5/20/16)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U338E) for a Permit to Construct Electrical Facilities With Voltages Between 50 kV and 200 kV: Moorpark-Newbury 66 kV Subtransmission Line Project.	Application 13-10-021 (Filed October 28, 2013)

DECISION GRANTING PERMIT TO CONSTRUCT THE MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE PROJECT

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DECISION GRANTING PERMIT TO CONSTRUCT THE MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE PROJECT

Summary

This decision grants Southern California Edison Company (SCE) a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project, with mitigation identified in the Mitigation Monitoring, Reporting and Compliance Plan attached to this order. As the lead agency for environmental review of the project, we find that the Environmental Impact Report for this project meets the requirements of the California Environmental Quality Act. This proceeding is closed.

1. Background

By this application, Southern California Edison Company (SCE) seeks a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project. The proposed project would provide a new 66 kV subtransmission between Moorpark and Newbury Substations, and would be located entirely within existing right-of-ways between the Cities of Moorpark and Thousand Oaks in Ventura County.

General Order (GO) 131-D exempts utilities from the otherwise-applicable requirement to obtain a permit to construct electric power line facilities with voltages between 50 kV and 200 kV pursuant to certain exemptions specified in Section III.B.1, except that the exemptions shall not apply under certain exception criteria that are specified in Section III.B.2. A utility claiming such an exemption must file an advice letter giving notice of its intent to construct the project pursuant to the exemption.

SCE originally gave notice of its plan to build the proposed project by Advice Letter 2272-E in October 2008, claiming that the project was exempt from

GO 131-D's permit requirement pursuant to Section III.B.1.g (Exemption g), which exempts projects that are "located in an existing franchise, road-widening setback easement, or public utility easements …." The advice letter was protested by local governments and local area residents and ultimately resolved by Executive Director Action Resolution E-4225, which determined that the project was indeed exempt from California Public Utilities Commission (Commission) permitting requirements.

Alan and Peggy Ludington (Ludingtons), Danalynn Pritz, and David J. Tanner appealed Resolution E-4225 in March 2009. At the County of Ventura's request, the Commission conducted an informal public participation hearing in September 2009 to provide a forum for the County, SCE, and residents to speak to the matter. On March 11, 2010, the Commission issued Resolution E-4243 dismissing the appeal based on the findings that (1) SCE complied with the notice requirements for the proposed construction of the project; (2) the project was exempt from GO 131-D's permitting requirements pursuant to Exemption g, and (3) the facts claimed by the appellants did not support a finding that the exception criteria applied. SCE commenced project construction in fall 2010.

Ludingtons filed Application (A.) 10-04-020 for rehearing of Resolution E-4243, claiming that Exemption g did not apply to the proposed project, that in any event the conditions specified in Section II.B.2 rendered Exemption g inapplicable, and that the procedures used to resolve the protests to Advice Letter 2272-E, violated our due process and our rules. On November 11, 2011, the Commission issued Decision (D.) 11-11-019, which dismissed SCE's Advice Letter 2272-E without prejudice, vacated Resolution E-4243, and ordered SCE to cease any construction activity and file

this application for a permit to construct on the basis that the rehearing application raised new factual allegations that could not be resolved in the appellate process.[1]

By this juncture, SCE had installed one tubular steel pole and constructed 700 feet of duct bank within the Moorpark Substation; constructed 24 pole foundations and installed 21 complete and one partial tubular steel poles within five miles between Moorpark Substation and the City of Thousand Oaks; evacuated holes for three pole foundations and constructed five pole foundations within three miles between the City of Thousand Oaks and near the intersection of Conejo Center Drive and Rancho Conejo Boulevard; and replaced 27 wood poles with light-weight steel poles, installed a portion of conductor, and transferred the existing lines to the new structures within the remaining one mile to Newbury Substation.

SCE filed this application for a permit to construct the proposed project on October 28, 2013, and timely protests were filed by Ludingtons, James Porter (Porter) Cheryle M. Potter and Herbert T. Potter (Potters), Donald Walker and Therese Walker (Walkers), Krista and Phillip Pederson (Pedersons), the Office of Ratepayer Advocates, and Environmental & Regulatory Specialists, Inc.

Pursuant to GO 131-D, a permit to construct is conditioned on the Commission's determination that the project complies with the California Environmental Quality Act (CEQA) and with the Commission's policies requiring the use of low-cost and no-cost measures to mitigate electric and magnetic field effects (EMF). CEQA requires the lead agency (the Commission in

[1] D.11-11-019 rejected the Ludingtons' claims of due process and rules violations.

this case) to conduct a review to identify the environmental impacts of the project, and ways to avoid or reduce environmental damage, for consideration in the determination of whether to approve the project, a project alternative, or no project. Where it is anticipated that the proposed project will create significant and unmitigable environmental impacts, then the lead agency must prepare an environmental impact report (EIR) that identifies the environmental impacts of the proposed project and alternatives, designs a recommended mitigation program to reduce any potentially significant impacts, and identifies, from an environmental perspective, the preferred project alternative.

In addition, pursuant to GO 131-D and Decision (D.) 06-01-042, the Commission will not approve a project unless its design is in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures.

The Commission's Energy Division issued the Draft EIR on June 11, 2015, and issued the Final EIR on November 4, 2015.[2]

A prehearing conference was conducted on August 13, 2015, in Thousand Oaks, California, at which time Santa Rosa Valley Estates Homeowners Association and Center for Biological Diversity (CBD) appeared and were granted party status.

[2] The Final EIR contains comments on the Draft EIR, responses to the comments, and revisions to the Draft EIR. The EIR is comprised of both the Draft EIR and the Final EIR.

Evidentiary hearing was held on January 28, 2016, in Los Angeles. SCE, CBD and, jointly, Ludingtons, Environmental & Regulatory Specialists, Inc.,[3] Santa Rosa Valley Estates Homeowners Association, Pedersons, Potters, Porter and Walker (Intervenors) filed opening briefs on March 10, 2016, and reply briefs on April 10, 2016, upon which the matter was submitted.

2. Scope of Issues

The assigned Commissioner's November 13, 2015, scoping memo identifies the following issues to be determined in this matter:

1. What are the significant adverse environmental impacts of the proposed project? This issue encompasses consideration of whether the project design comports with Commission rules and regulations and other applicable standards governing safe and reliable operations.
2. Are there potentially feasible mitigation measures or project alternatives that will avoid or lessen the significant adverse environmental impacts? This issue encompasses consideration of how to design the proposed project in a manner that ensures its safe and reliable operations.
3. As between the proposed project and the project alternatives, which is environmentally superior?
4. Are the mitigation measures or project alternatives infeasible?
5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable adverse environmental impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed project or project alternative?

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[3] Environmental & Regulatory Specialists, Inc. is represented by David J. Tanner. Although the Intervenors' brief misidentifies David J. Tanner as the party, we deem it to be jointly sponsored by Environmental & Regulatory Specialists, Inc.

6. Was the EIR completed in compliance with CEQA, did the Commission review and consider the EIR prior to approving the project or a project alternative, and does the EIR reflect our independent judgment?
7. Is the proposed project and/or project alternative designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures?
8. Should the application be dismissed on the basis that SCE and Commissioners or Commission staff engaged in (1) private communications between SCE and Commissioners' personal advisors during the pendency of A.10-04-020, (2) private communications between SCE and Commissioners' personal advisors during the pendency of the informal appeal of Resolution E-4225,[4] (3) private communications between SCE and the Commission's General Counsel during the pendency of A.10-04-020, and/or (4) communications between SCE and environmental consultants for the Commission's Energy Division regarding SCE's preparation of the Proponent's Environmental Assessment for this application?

3. Environmental Impacts of Proposed Project

The proposed project would consist of the following main components:

- Installation of approximately 500 feet of new underground 66 kV subtransmission line and a new line position in the 66 kV switchrack entirely within Moorpark Station.
- Installation of two tubular steel pole foundations, four tubular steel poles, the upper portion of one tubular steel pole, and approximately five miles of conductor on new and existing tubular steel poles along the new Moorpark-Newbury 66 kV subtransmission line on the

[4] The scoping memo inadvertently refers to the informal appeal of Resolution E-4243. The correct reference is to Resolution E-4225, which was resolved by Resolution E-4243. Resolution E-4243 was formally appealed by A.10-04-020, which was resolved by D.11-11-019.

south and east sides of SCE's existing Moorpark-Ormond Beach 220 kV right-of-way.

- Installation of eight tubular steel foundations, 13 double-circuit tubular steel poles, and approximately two miles of conductor on the new Moorpark-Newbury 66 kV subtransmission line, and reconductoring of two miles of the Moorpark-Newbury-Pharmacy 66 kV subtransmission line. The two subtransmission lines would be collocated on the new double-circuit tubular steel poles, and 14 existing lattice steel towers along this two-mile segment would be removed.
- Installation of approximately one mile of conductor in order to collocate the two subtransmission lines on previously installed lightweight steel poles into Newbury Substation. In addition, four tubular steel pole foundations, four tubular steel poles, two lightweight steel poles, and a new 66 kV subtransmission line position would be installed, and six wood poles would be removed, at Newbury Substation.

The proposed project would have significant and unavoidable impacts on air quality and noise during project construction. Construction-related daily exhaust emissions of NOx would exceed the applicable significance threshold, resulting in emissions that could contribute to a violation of ozone air quality standards, which would be individually significant as well as cumulatively considerable. Construction-related activities would generate noise levels that would exceed the Ventura County construction noise threshold criteria, and nighttime construction–related activities would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.

The proposed project would not have any significant environmental impacts on aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic that cannot be mitigated to a less-than-significant level with the mitigation

measures identified in the Mitigation Monitoring, Reporting and Compliance, and Program (MMRCP).

The proposed project would have no impact or a less-than-significant impact on agriculture and forestry resources, energy conservation, geology and soils, greenhouse gas emissions, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.

4. Project Alternatives

CEQA requires the consideration of a range of reasonable project alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project.

The EIR identifies the following project objectives:

- Meet forecasted electrical demand in the Electrical Needs Area (ENA).
- Maintain sufficient voltage in accordance with applicable requirements.
- Maintain system reliability within the ENA.
- Utilize and manage existing right-of-way in a prudent manner.
- Maintain consistency with the Garamendi Principles (Senate Bill 2431, Stats. 1988, Ch. 1457).
- Maintain consistency with GO 95's rules for overhead electric line construction.
- Design and construct the project in conformance with SCE's applicable engineering, design, and construction standards.

The EIR screened six project alternatives (and a combination of two of those alternatives), but determined that none would both feasibly attain most of

the basic project objectives and avoid or substantially lessen the proposed project's significant effects. Alternative 1 (reconductoring) would result in the projected overload of the Moorpark-Newbury tap in 2023[5] and voltage violations at Newbury Substation in 2015. Alternative 2 (realignment of a portion of the Moorpark-Ormond Beach line) would be inconsistent with GO 95 pertaining to unnecessary crossings of existing transmission lines and would not conform to SCE's engineering, design, and construction standards, and it would result in greater environmental impacts than the proposed project. Alternative 3 (collocation with existing Moorpark-Newbury-Pharmacy line) failed because it would result in greater environmental impacts than the proposed project. Alternative 4 (reconnect the Camgen Generator) would result in projected voltage violations at Newbury Substation in 2015.[6] Alternative 1 combined with Alternative 4 would result in the projected overload of the Moorpark-Newbury tap in 2023 and voltage violations at Newbury Substation in 2015. Alternative 5 (demand-side management) would not serve projected demand or reliability objectives and is not feasible on a scale that would be suitable to replace the proposed project within a reasonable period of time. Alternative 6 (renewable and distributed generation energy resources) would still require upgraded or new subtransmission and transmission infrastructure, there is limited potential for local renewable resources or distribute generation to meet the projected

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[5] Citing to the Draft EIR, CBD incorrectly asserts that the EIR identifies the projected overload as occurring in 2026. (CBD opening brief, p.9.) The Final EIR revised this projection to 2023. (Final EIR, pp. 3.1-9 and 4-12.)

[6] Intervenors incorrectly assert that the EIR eliminated this alternative because of the possibility of insufficient right–of-way. (Intervenors opening brief, p.36.)

demand or reliability objectives for the projects, and it would potentially result in greater environmental impacts than the proposed project.

CEQA also requires the evaluation of the "no project" alternative. The EIR evaluated two "no project" alternatives.

Under the No Project Alternative 1, the proposed project would not be built, and all of the infrastructure already constructed for the project would remain in place. The No Project Alternative 1 would have no impact for all resource areas.

Under the No Project Alternative 2, the proposed project would not be built, and the infrastructure already constructed for the project would be removed (with the exception of the previously installed lightweight steel poles and energized conductor and, at SCE's discretion, the infrastructure already installed at Moorpark and Newbury Substations). The No Project Alternative 2 would have significant and unavoidable impacts on air quality and noise during deconstruction similar to, but slightly less than, those of the proposed project. The No Project Alternative 2 would have similar or lesser impacts than the proposed project in all other resource areas.[7]

5. Environmentally Superior Alternative

Pursuant to CEQA Guidelines § 15126.6(e)(2), if the EIR identifies the "no project" alternative as the environmentally superior alternative, it must "also identify an environmentally superior alternative among other alternatives." The

[7] Citing to Table 6-1 summarizing *significant and unavoidable* environmental impacts of the proposed project and alternatives, Center for Biological Diversity (CBD) incorrectly asserts that the EIR finds that the No Project Alternative 2 would have the same impacts as the proposed project. (CBD opening brief, p.8.) To the contrary, as shown in Table 6-2 summarizing *all* environmental impacts, the EIR finds that the No Project Alternative 2 would have slightly less impacts than the proposed project in most resource areas.

EIR identifies the No Project Alternative 1 as the environmentally superior alternative because it would avoid any environmental impacts. The EIR analyzed a range of alternatives, but did not identify any that could feasibly accomplish most of the basic objectives of the proposed project and could avoid or substantially lessen one or more of the significant effects. Therefore, the proposed project is the environmentally superior alternative apart from the "no project" alternatives.

6. Certification of EIR

CEQA requires the lead agency to certify that the EIR was completed in compliance with CEQA, that the agency has reviewed and considered it prior to approving the project, and that the EIR reflects the agency's independent judgment.

Energy Division issued the Draft EIR for public review and comment on June 11, 2015, and provided notice of the public review period and public meeting on June 24, 2015, in Thousand Oaks to public agencies, adjacent property owners and occupants, the official service list for this matter, and agencies, organizations, and individuals that submitted comments on the Notice of Preparation for the EIR, and published public notices on June 11 and 20, 2015, in the local newspaper. Public comments were taken from at least 18 speakers at the public meeting, and Energy Division received written comments from approximately 170 individuals and organizations during the comment period, which ended July 27, 2015, and six written comments between September 2 and October 18, 2015, after the comment period had ended.

The Final EIR documents all comments made on the Draft EIR, and responds to them, as required by CEQA.[8] The EIR identifies the proposed project's significant and unavoidable environmental impacts, mitigation measures that will avoid or substantially lessen them, and the environmentally superior alternative. We have reviewed and considered the information contained in the EIR, as well as parties' challenges to the adequacy of the EIR as discussed below. We certify that the EIR was completed in compliance with CEQA, we have reviewed and considered the information contained in it, and we certify that it reflects our independent judgment and analysis.

6.1. Project Description and Baseline

Intervenors and CBD assert that the EIR is inadequate because it includes SCE's past construction of the power line as part of the baseline conditions and excludes the past construction from the project description. To the contrary, the EIR's definition of baseline conditions fully complies with CEQA. CEQA Guidelines § 15125(a) provides:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.

[8] The Final EIR responds to the late comments but, due to publishing constraints resulting from their lateness, does not include them in the document.

There is no reasonable dispute that the physical environmental conditions in the vicinity of the project, as they existed at the time the notice of preparation was published, included SCE's past construction.

CBD asserts that, pursuant to CEQA Guidelines § 15125(a), the proper baseline is conditions at the time SCE filed Advice Letter 2272-E because the Commission engaged in environmental analysis "when it determined that a CEQA exemption was applicable." (CBD opening brief, p.15.) CBD mistakenly confounds exemption from CEQA with inapplicability of CEQA. CEQA only applies to "projects," which are defined in relevant part as "an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." (CEQA Guideline § 15378(a)(3).) A CEQA "project" may nevertheless be exempt from CEQA review under a number of exemptions contained in CEQA Guidelines §§ 15250 through 15333. However, if an activity does not require a permit, it is not a "project" subject to CEQA in the first place. Here, SCE's advice letter was not an application for a permit, and the Commission's inquiry at the time SCE filed its advice letter was not whether construction of the Moorpark-Newbury 66 kV Transmission Line was exempt from CEQA review. Rather, the Commission's inquiry was whether the construction was exempt from GO 131-D's permitting requirements such that it was not a "project" and therefore not subject to CEQA in the first place. Resolution E-4225 affirmed, and Resolution E-4243 reaffirmed, that the activity did not require a permit pursuant to GO 131-D. As it did not require a permit, the activity was not a "project" and was not subject to CEQA.

Intervenors and CBD maintain that D.11-11-019's subsequent dismissal of Advice Letter 2272-E and vacation of Resolution E-4243 constituted the Commission's "acknowledging the mistake it made" in granting its "wrongly

issued approval" for the "illegal construction." (CBD opening brief, p.15; Intervenors' opening brief, p.73.) To the contrary, D.11-11-019 expressly stated that it did not make any decision as to whether SCE required a permit pursuant to GO 131-D. (D.11-11-019 at 2, 20.) To be sure, by D.11-11-019's order directing SCE to cease construction and apply for a permit to construct the power line, additional power line construction thereupon became a "project" under CEQA because it thereupon became "an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." (CEQA Guidelines § 15378(a).) Nevertheless, the Commission's post-hoc order requiring SCE to obtain a permit to construct the power line cannot be held to transform the prior construction into an illegal activity under CEQA.

In any event, whether or not the prior construction was illegal makes no difference for purposes of the CEQA analysis. The general rule that ongoing activities should be treated as part of the baseline applies equally when the project includes renewal of a permit for an existing facility, even though the facility was not previously reviewed under CEQA. (*Citizens for East Shore Parks v. California State Lands Comm'n* (2011) 202 Cal.App.4th 549, 557-558.) It also applies when the existing physical conditions violate current regulatory provisions. (*Id.* at 559; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452-1453; *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1270; *Eureka Citizens for a Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 371.)

Intervenors and CBD assert that the past construction must be included in the EIR's project description because it is part of the Moorpark-Newbury 66 kV subtransmission line and therefore part of the "whole of the action" as CEQA

Guidelines § 15378 defines the term "project." (CBD opening brief, p.5.) They assert that the EIR instead improperly divides the project into parts, contrary to CEQA Guidelines § 15069 and its interpretation in Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263 and its progeny. To the contrary, CEQA Guidelines § 15069 and its prohibition against "piecemealing" a project into its parts concerns future activities, not past activities that are properly included in the project baseline as was the case in Fat, Riverwatch and Eureka Citizens.[9]

Intervenors cite to *Laurel Heights Improvement Association v. Regents of University of California* (1988) 47 Cal.3d 396, for the proposition that the "whole of the project" should encompass SCE's "master plan" for the Big Creek-Ventura area, including any projects affecting the Thousand Oaks, Moorpark and Newbury Park communities including the substations, transmission lines and right-of-ways that serve them, as well as SCE's 2015 Distributed Resources Plans, its proposed Puente Power Plant in Oxnard, its improvement and reconductoring of the Colonia substation and line, any pole replacement and reconductoring under the Pole Loading Program, SCE's 2014 Energy Storage Procurement Plan, and SCE's rooftop solar projects under Assembly Bill 327. (Intervenors opening brief, pp. 70-71.) To the contrary, Laurel Heights holds that "an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental

[9] CEQA Guidelines § 15069 provides, "Where individual projects are, or a phased project is, *to be undertaken* and where the total undertaking comprises a project with significant environmental effect, the lead agency must prepare a single EIR for the ultimate project." (Emphasis added.)

effects. Absent these two circumstances, the future expansion need not be considered in the EIR for the proposed project." (Laurel Heights at 396.) Intervenors do not show that any of these activities are a reasonably foreseeable consequence of the Moorpark-Newbury 66 kV subtransmission line, and there is no basis for us to assume otherwise.

CBD maintains that the EIR must review the prior construction because D.11-11-019 directed SCE to file this application "if it wishes to build the power line described in Advice Letter 2272-E" and the past construction is part of that power line. We do not interpret this language to have us engage in a fiction in which the past construction has not occurred, or to have us deviate from established precedent with regard to the scope of CEQA review as discussed above.

6.2. Project Objectives

Intervenors argue that the EIR is flawed because the Draft EIR's project objectives deviated from the project description in Advice Letter 2272-E, and because the Final EIR's project objectives deviated from the Draft EIR by identifying potential new voltage violation scenarios in response to SCE comments on the Draft EIR. Intervenors cite to *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193, and *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 818 for the proposition that the EIR's project description should be deemed inadequate for this reason. (Intervenors opening brief, pp.61-64.) Intervenors are mistaken; the project objectives are the same in Draft and Final EIRs. (Compare Draft EIR, p. 1-3 and Final EIR, p. 3.1-4.) Intervenors mischaracterize the Final EIR's response to comment O9-1 as altering

the second project objective[10] by "add[ing] a third violation criterion: 'overload on the Thousand Oaks 66 kV line beginning in 2015 during an N-1 abnormal system condition." (Intervenors' opening brief, p.64.) To the contrary, the response does not alter the project objective; rather, it notes SCE's comment that identifies this additional voltage criteria violation under SCE's most recent 10-year forecast. (Final EIR, Response O9-1, p.3.2-93.) Intervenors offer no rational basis for concluding that the EIR is flawed for acknowledging this information, and none is apparent.

6.3. Cumulative Impacts

The Final EIR revises the Draft EIR's discussion of "CPUC Procedural Activities" (Section 2.2) to clarify that past construction activities are considered in the analysis of cumulative effects (Chapter 7) to the extent that they are causing continuing impacts that could combine with those of the proposed project. (Final EIR, Master Response 4, p. 3.1-24.) However, as Intervenors point out, the Final EIR did not carry this clarification through to Chapter 7 itself. Accordingly, Energy Division issued an errata on April 21, 2016, revising Chapter 7 to comport with the response to comment.

6.4. Electrical Needs Area

The EIR defines the Electrical Needs Area (ENA) to be served by the proposed project as the customers served by the Newbury and Pharmacy Substations. Intervenors assert that the ENA "was intentionally designed to ignore the favorable impact of the interrelatedness between Newbury Substation and adjacent substations," and that it should instead be defined as the customers served by the Newbury, Thousand Oaks and Potrero Substations

[10] "Maintain sufficient voltage in accordance with applicable requirements."

because the Pharmacy Substation cannot be considered in determining reliability, Thousand Oaks Substation's load growth has factored into SCE's load growth forecast,[11] and Thousand Oaks and Potrero Substation are logically related to the Moorpark system grid. (Intervenors opening brief, pp. 35 and 81.) Intervenors' assertion is without merit. The EIR properly defines the ENA as the customers served by the Newbury and Pharmacy Substations because these are the customers whose service would be directly at risk of disruption if an outage were to occur on the Moorpark-Newbury-Pharmacy line. Furthermore, the definition of the ENA does not – and did not in this case – restrict consideration of the interrelatedness of facilities outside of the ENA in the evaluation of project alternatives: The EIR considered the related Newbury-Thousand Oaks line when it identified and analyzed Alternative 1, which would reconductor both the Moorpark-Newbury-Pharmacy line and the Newbury-Thousand Oaks line. (Draft EIR, p. 4-7.)

6.5. Public Safety Hazards

Intervenors assert that the EIR failed to give due consideration to public safety concerns raised in comments on scoping and the Draft EIR. To the contrary, the very citations that intervenors reference in support of this proposition demonstrate that the Final EIR appropriately summarizes and responds to all such comments. (Final EIR, pp. 3.3-116, 127-130.) We reiterate CEQA Guideline § 15151 which states in part, "Disagreement among experts

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[11] Intervenors charge SCE with manipulating its load growth forecast by adding Thousand Oaks Substation's projected load growth to its 2015-2024 forecast. (Intervenors' opening brief, p.64.) To the contrary, all of the power flow forecasts that SCE has provided in this proceeding (i.e., 2013-2022, 2014-2023, and 2015-2023) have included load forecast data for Thousand Oaks Substation. (*See* Proponent's Environmental Assessment, Attachments B, C, and D, and SCE responses to CPUC Data Requests 3 and 6.)

does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."

6.6. Peak Load Growth Forecasts

Intervenors and CBD challenge the EIR for using SCE's peak load growth forecast, which they assert is overstated and unsupported.[12] To the contrary, as the Final EIR explains, the EIR reasonably relied upon SCE forecasts after independent review by its environmental consultant and electrical transmission planning consultant. (Final EIR, Master Response 5, pp. 3.1-25 through 3.1-28.) The EIR comports with CEQA Guidelines § 15144 that, while recognizing that "foreseeing the unforeseeable is not possible," an agency is required to "use its best efforts to find out and disclose what it reasonably can."

6.7. Alternatives

CBD challenges the EIR for rejecting Alternatives 1, 4, 1+4, 5 and 6 in part because they would result in voltage violations; CBD asserts that such violations can be resolved by not re-energizing the Pharmacy Substation following an N-1 of the Moorpark-Newbury-Pharmacy line. (CBD opening brief, pp. 9-10.) To the contrary, as discussed in greater detail in Part 8 ("Overriding Considerations") below, SCE is obligated to re-energize Pharmacy Substation following an outage of the Moorpark-Newbury-Pharmacy line. CBD also asserts that such violations can be resolved by installing more reactive power at the Newbury Substation and transferring some load from the Newbury Substation to adjacent substations. (*Id.)* CBD does not cite to any record evidence for this proposition in violation of

[12] Intervenors object to SCE's peak load growth forecast for using "normal" peak demand instead of "low" or "no" growth. (Intervenors' opening brief, p.48.) We note that, to the contrary, SCE's 2014-2023 and 2015-2024 forecasts used "likely case" peak data, not "normal" peak demand data. (*See* Final EIR, Master Response 5, p. 3.1-28.)

Rule 13.11, and it is not apparent what CBD means by installing more reactive power at Newbury Substation. However, we note that the EIR evaluated the option of implementing a power storage facility at Newbury Substation (Final EIR, Appendix G, p.7) and of transferring some load from the Newbury Substation to adjacent substations (*id*., pp. 1-2) and explains why they were determined not to be feasible.

CBD suggests that battery storage is a viable project alternative because, contrary to SCE's argument in its opening brief that it would only provide two of the four hours that SCE considers to be necessary during an N-1 condition at peak demand, SCE witness McCabe allegedly "admitted" under cross-examination that a four-hour battery could be used. (CBD reply brief, pp. 4-5, citing to RT 157-158, 160.) CBD mischaracterizes and obfuscates the testimony. Witness McCabe merely agreed that "it is possible that there would be a battery that would have a four-hour duration," and his testimony on page 159, which CBD omitted from its citation, explains that the battery described in CBD's hypothetical would not be sufficient to serve the requisite load. In any event, the EIR considered the potential for electricity storage as a project alternative in response to comments, and reasonably concluded that it is not. (*See* Final EIR, Master Response 1, pp. 3.1-6 through 3.1-8, addressing electricity storage in the context of demand-side management and distributed energy generation alternatives; Response I50-3, p.3.3-222, regarding thermal energy storage; and Appendix G, p.7, regarding general storage equipment at Newbury Substation.)

CBD suggests that voltage support devices are a viable project alternative because, contrary to SCE's argument in its opening brief that it risks creating an excessive overvoltage situation, witness McCabe allegedly acknowledged under

cross-examination that concern to be a "red herring." (CBD opening brief, p.6, citing to RT 160-161.) To the contrary, in the testimony to which CBD cites, witness McCabe merely agreed that capacitors can be set to automatically switch off when a high-voltage condition is detected, and that automatic switches have the ability to energize and de-energize capacitor banks in a fraction of a second. We do not conclude from this testimony that voltage support devices are therefore a viable project alternative to the proposed project. Furthermore, we remind CBD that the time and place for suggesting additional project alternatives beyond those assessed in the Draft EIR was in comment on the Draft EIR. (*See* June 11, 2015, Administrative Law Judge's (ALJ) Ruling; Assigned Commissioner's Scoping Memo.) We are not aware of any such comment with regard to the viability of voltage support devices as a project alternative, and CBD's testimony on this subject is untimely. In any event, we are persuaded by SCE witness McCabe's rebuttal testimony that concludes, based on SCE's investigation of a range of seven hypothetical capacitor-based options and consideration of space at the existing facilities, such alternative is not feasible. (SCE/McCabe, Exhibit 9, pp. 10-23.)

Intervenors suggest that the EIR is flawed for failing to evaluate SCE's "Operational Excellence" program as a project. (Intervenors opening brief, pp. 28-29.) To the contrary, as discussed more fully in Part 7.8 ("Independent Judgment and Analysis") below, the Final EIR evaluated the alternative in response to Ludingtons' late comment on the Draft EIR identifying this potential alternative, and the EIR provides a sufficient explanation of why it did not qualify for full evaluation. (Final EIR, Appendix G.)

6.8. Independent Judgment and Analysis

Intervenors assert that "the Final EIR appears to accept every assertion of SCE, without meaningful independent assessment," specifically with regard to its rejection of project alternatives and its electrical demand and need projections. (Intervenors opening brief, p.86.) To the contrary, as evidenced by the response to comments challenging the Draft EIR, the EIR presents a fair and impartial assessment of these issues. (*See* Final EIR, Master Responses 1 and 5, Responses I50-12 through I50-34, and Response O9-11.)

Intervenors assert that the EIR does not reflect the Commission's independent judgment, and is biased, because Energy Division's project manager was staff on Advice Letter 2272-E and the resolutions affirming that the project was exempt from GO 131-D's permitting requirements. To the contrary, the project manager's prior involvement in the determination of whether the proposed project was exempt from GO 131-D's permitting requirements does not reasonably create the appearance of bias, much less demonstrate it, and such suggestion is belied by the substance of the EIR.

Intervenors assert that the EIR is biased because, previously, in SCE's application for a permit to construct the Presidential Substation project (A.08-12-023), the Energy Division's consultants had determined that the Presidential Substation project did not include the Moorpark-Newbury project, notwithstanding public demand to the contrary. To the contrary, the consultants' prior determination regarding the project description in A.08-12-023 does not reasonably create the appearance of bias, much less demonstrate it, and such suggestion is belied by the substance of the EIR.

Intervenors assert that the failure to include Ludington's late comment letters in the Final EIR or to analyze the new information provided in them "seems a gross dereliction" of the Commission's duty to explore alternatives and demonstrates bias. (Intervenors' opening brief, pp. 88-89.) To the contrary, as stated in the Final EIR, the 45-day comment period concluded on July 27, 2015, and Ludingtons' late comment letters were received on September 2, 9, and 24, and October 12, 16, and 18, 2015, making it infeasible to include the comments in the Final EIR and publish the Final EIR on a reasonable schedule. Furthermore, the Final EIR does in fact evaluate the late comments and provides a sufficient explanation of why the numerous additional proposed project alternatives did not qualify for full evaluation and that the new information did not identify new issues or more severe impacts that would change any EIR findings. (Final EIR, Appendix G.) We reiterate that disagreement among experts does not make an EIR inadequate; nor does it demonstrate bias.

7. Infeasibility of Proposed Project and Mitigation Measures

CEQA Guidelines §15091(a) prohibits an agency from approving a project for which an EIR has been certified and which identifies one or more significant environmental effects of the project unless (1) the project incorporates changes that avoid or substantially lessen the project's significant environmental impacts, (2) such changes are within the responsibility and jurisdiction of another agency who can or will adopt them, or (3) such changes are infeasible. In this case, with the mitigation identified in the MMRCP the proposed project will avoid all significant environmental impacts other than air quality and noise impacts during project construction. No party asserts that any of the identified mitigation is infeasible and we have no reason to find otherwise.

8. Overriding Considerations

Pursuant to CEQA Guidelines § 15093, the Commission may only approve a project that results in significant and unavoidable impacts if it finds that there are benefits to the project that outweigh the unavoidable adverse environmental impacts and makes a statement of overriding considerations to that effect.

The proposed project would enable SCE to avoid a projected violation of applicable voltage criteria beginning in 2015 at Newbury and Pharmacy Substations, and overload on the Newbury-Thousand Oaks line,[13] under N-1 abnormal system conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation. It would also avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024.

Intervenors and CBD argue that the project is not needed because the potential voltage criteria violation can be avoided by leaving Pharmacy Substation and its industrial customer off-line for the duration of the N-1 event. To the contrary, system planning based on the targeted load interruption to one customer in order to provide other customers continued service would be a violation of SCE Tariff Rule 14.C, which requires in the event of a supply shortage that SCE apportion its electricity supply in an equitable manner.

Intervenors and CBD argue that SCE's planning criteria sanction such an approach because it allows for load interruptions at facilities served by a single subtransmission system component. SCE counters that the provision does not contemplate a wholesale interruption of the load served by the facilities, but only

[13] The Final EIR identified the overload on the Newbury-Thousand Oaks line beginning in 2015 during an N-1 abnormal system condition. (Final EIR, Response O9-1, p. 3.2-93.)

a brief interruption of service where at least some of the load can be accommodated by other distribution circuit connections during the N-1 event, which is not possible in this instance. We agree that a contrary conclusion would violate Tariff Rule 14.C and principles of fundamental fairness and equal protection.

9. Electric and Magnetic Fields Mitigation

The Commission has examined EMF impacts in several previous proceedings.[14] We found the scientific evidence presented in those proceedings was uncertain as to the possible health effects of EMFs and we did not find it appropriate to adopt any related numerical standards. Because there is no agreement among scientists that exposure to EMF creates any potential health risk, and because CEQA does not define or adopt any standards to address the potential health risk impacts of possible exposure to EMFs, the Commission does not consider magnetic fields in the context of CEQA and determination of environmental impacts.

However, recognizing that public concern remains, we do require, pursuant to GO 131-D, Section X.A, that all requests for a permit to construct include a description of the measures taken or proposed by the utility to reduce the potential for exposure to EMFs generated by the proposed project. We developed an interim policy that requires utilities, among other things, to identify the no-cost measures undertaken, and the low-cost measures implemented, to reduce the potential EMF impacts. The benchmark established for low-cost measures is 4 percent of the total budgeted project cost that results

[14] *See* D.06-01-042 and D.93-11-013.

in an EMF reduction of at least 15 percent (as measured at the edge of the utility right-of-way).

SCE filed a detailed Field Management Plan (FMP) as Appendix F to its application, based on the proposed project. The FMP provides that the project will utilize subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria, arrange conductors of subtransmission line for magnetic field reduction, and utilities double-circuit construction that reduces spacing between circuits as compared with single-circuit construction. In addition, SCE will place new electrical equipment away from the Moorpark Substation property lines closest to populated areas.

Intervenors argue that, in identifying potential no-cost and low-cost measures, SCE should have assumed the existing 220 kV Moorpark-Ormond Beach 220 kV line's current status of limited energization (as the current peaker Mandalay and Ormond Beach Power Plants are being decommissioned and the proposed Puente Power Plant is designed as a peaker). We find it more prudent to plan for the potential maximization of the line's use when identifying measures to reduce EMF effects.

Intervenors argue that SCE should have analyzed affixing insulators and conductor mounts on the west side of the tubular steel poles rather than on the east side closer to homes. SCE witness Hung testified at hearing that the effect of this small shift on EMF reduction would be negligible, and he raised questions about whether it would inhibit safe maintenance access to poles and towers. (SCE/Hung, RT 92-106.) Nevertheless, Intervenors' suggestion appears to have the potential to reduce EMF effects at little or no cost, and there is not sufficient evidence to conclude that it would in fact inhibit access. It is reasonable for SCE to analyze the potential measure and implement it if it is found to be feasible and

low- or no-cost. We therefore direct SCE to perform the analysis, and to submit an advice letter reporting on its results and, if appropriate, amending its FMP to incorporate the measure.

Intervenors argue that SCE should have analyzed the EMF effects of constructing the project on the west side of the Moorpark-Ormond Beach right-of-way (Alternative 2) or any other of the EIR alternatives. We reject these arguments as moot as the EIR has found the alternatives not to be feasible.

We find that the FMP complies with the Commission's EMF decisions, except that we direct SCE to submit an advice letter no later than 90 days after the effective date of this decision reporting on the results of its analysis of whether affixing insulator and conductor mounts to the west side of project poles are a low- or no-cost measure for reducing EMF effects and, if so, amending the FMP accordingly.

10. SCE's Communications with Advisors, Staff, and General Counsel During Pendency of Prior Proceedings and EIR

Intervenors, supported by CBD, assert that this application warrants dismissal due to the following undisputed contacts between SCE and Commission staff:

- During the pendency of the informal appeal of Resolution E-4225, SCE representatives communicated with then-President Peevey's personal advisor Carol Brown (and perhaps other Commissioners' personal advisors) regarding the status of its discussions with the County of Ventura regarding the Moorpark-Newbury power line project.
- During the pendency of the informal appeal of Resolution E-4225, SCE representatives provided technical information regarding the project to Energy Division engineering staff.

- During the pendency of A.10-04-020, the formal application for rehearing of Resolution 4243-E, an SCE representative communicated its intention to commence, and status of, project construction to Energy Division manager Ken Lewis.
- During the pendency of A.10-04-020, an SCE representative communicated to Commission General Counsel that project construction had commenced.
- Energy Division staff and consultants advised SCE regarding preparation of the Proponent's Environmental Assessment (PEA), and requested and received responses to data requests regarding the PEA.

Intervenors label these communications as unfair, inappropriate, and unethical, warranting dismissal of the application. Intervenors concede that the communications violate no rule or statute. However, they contend that the communications are nevertheless unfair, inappropriate, and unethical. (Intervenors' opening brief, pp. 96-103.) To the contrary, statute and rule clearly delineate between permissible and impermissible communications regarding Commission matters, and we do not presume to challenge that delineation here. There is no prohibition under any circumstances against private substantive communications between regulated utilities or any interested persons and Energy Division staff or the General Counsel, and communications with Commissioners' personal advisors is only prohibited in formal proceedings that have been categorized as adjudicatory (and is permitted, but must be reported, in formal proceedings that have been categorized as ratesetting). Public Utilities Code (Pub. Util. Code) §§ 1701.1 et seq.; Rule 8.1 et seq.) The advice letter process, by definition, is not a formal proceeding and, consistent with Rule 8.3(g), the restrictions (or lack thereof) that attended the informal process underlying Advice Letter 2272-E applied to A.10-04-020, the formal application

for rehearing of Resolution 4243-E. These communications do not warrant dismissal of this application.

Intervenors assert that the communications between SCE and Energy Division and its consultants regarding the sufficiency of the PEA, and Energy Division's "collegial" data requests to SCE served to inappropriately "coach" and "collaborate with" SCE in "correcting and perfecting data and power flow analyses," warranting dismissal of the application. (*Id.*, pp.104-108.) To the contrary, Energy Division and its consultants independently, objectively, and rigorously tested the need for and alternatives to the proposed project, as demonstrated by the CEQA administrative record and the Commission's commissioning of a third-party electrical consultant to evaluate the electrical data provided by SCE. The Intervenors' allegations are without merit.

11. Other Issues

Intervenors raise three additional issues in context of the private communications between SCE and Commission staff. First, Intervenors' conjecture, on the one hand, that no one involved in the rehearing process at the Commission was aware of the start of construction (*id.*, pp. 93-94)[15] while asserting, on the other hand, that the Commission's General Counsel was aware of the construction during the Commission's ongoing legal review (*id.*, pp.100-101). In the context of these communications (or lack thereof), Intervenors assert that it was unfair, inappropriate and unethical for SCE to have proceeded with construction, warranting dismissal of the application.

[15] Intervenors note SCE's testimony that it kept Energy Division staff apprised of its project construction, but do not offer any basis for conjecturing that staff did not communicate this information to Legal Division. (*Id.*, p. 94.)

We disagree. By statute and rule, the application for rehearing of Resolution E-4243 did not stay the resolution. (Pub. Util. Code § 1733, Rule 16.1(b).) We further note that the Commission recognized that SCE may have already proceeded with construction when it ordered SCE to cease it. (D.11-11-019, ordering paragraph 5.) SCE was within its rights to commence construction during the pendency of the application for rehearing of Resolution 4243-E, and its having done so does not warrant dismissal of this application.

Second, Intervenors assert that the Commission inappropriately resisted their Public Records Act (PRA) requests for project-related communications between the Commission and SCE, which contaminated this proceeding and contributed to the circumstances warranting dismissal of the application. (*Id.*, pp. 91-92.) The issue of the Commission's compliance with the PRA is well beyond the scope of this proceeding.

Lastly, Intervenors assert that it was unfair, inappropriate and unethical for the Commission to have voted on Resolution 4243-E notwithstanding alleged representations by President Peevey's personal advisor Carol Brown that the Commission would not vote on the item until the public's concerns were satisfied, warranting dismissal of this application. (*Id.*, pp. 96-99.) The issue of whether the Commission improperly voted on Resolution 4243-E is well beyond the scope of this proceeding.

12. Comments on Proposed Decision

The proposed decision of ALJ Hallie Yacknin in this matter was mailed to the parties in accordance with Pub. Util. Code § 311 and comments were allowed pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on June 8, 2016, by SCE, Intervenors, and CBD, and reply comments were filed on June 14, 2016, by SCE and Intervenors. Intervenors' and CBD's comments asserting error are without merit. SCE's comments identify a minor factual error in the proposed decision's project description, and we correct it. No other changes are made to the proposed decision.

13. Assignment of Proceeding

Carla Peterman is the assigned Commissioner and Hallie Yacknin is the assigned ALJ in this proceeding.

Findings of Fact

1. The proposed project would have significant impacts on air quality and noise during project construction that can be reduced, but not avoided, with mitigation identified in the MMRCP.

2. The proposed project would not have any significant environmental impacts on aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic that cannot be mitigated to a less-than-significant level with the mitigation measures identified in the MMRCP.

3. The proposed project would have no impact or a less-than-significant impact on agriculture and forestry resources, energy conservation, geology and soils, greenhouse gas emissions, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.

4. There are no alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project.

5. The No Project Alternative 1 would have no impact for all resource areas.

6. The No Project Alternative 2 would have significant and unavoidable impacts on air quality and noise during deconstruction similar to, but slightly less than, those of the proposed project, and similar or lesser impacts than the proposed project in all other resource areas.

7. The proposed project is the environmentally superior project alternative.

8. The proposed project and its identified mitigation measures in the MMRCP are not infeasible.

9. The proposed project would enable SCE to avoid a currently projected violation of applicable voltage criteria in 2015 at Newbury Substation under N-1 conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation, and to avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024.

10. SCE's FMP incorporates many feasible no-cost and low-cost measures to reduce potential EMF impacts by utilizing subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria, arranging conductors of subtransmission line for magnetic field reduction, and utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit construction and, at the Moorpark Substation, placing new electrical equipment away from the substation property lines closest to populated areas.

11. Affixing insulator and conductor mounts to the west side of project poles, rather than the east side, may be a feasible and effective low- or no-cost measure for reducing EMF effects.

Conclusions of Law

1. The EIR was completed in compliance with CEQA.

2. The EIR reflects the Commission's independent judgment and analysis on all material matters.

3. The project benefits of enabling SCE to avoid a projected violation of applicable voltage criteria in 2015 at Newbury Substation under N-1 conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation, and to avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024 are overriding benefits that merit project approval notwithstanding its significant and unavoidable impacts on air quality and noise during project construction.

4. SCE should analyze whether affixing insulator and conductor mounts to the west side of project poles are a feasible and effective low- or no-cost measure for reducing EMF effects and, if so, amend the FMP accordingly. SCE's FMP otherwise comports with the Commission's policies regarding the mitigation of EMF effects.

5. None of the private communications between SCE and Commissioners' personal advisors, General Counsel, staff and consultants during the pendency of Advice Letter No. 2272-E, the informal appeal of Resolution E-4225, or A.10-04-020 formally appealing Resolution E-4243, or during the preparation of the Proponents Environmental Assessment or EIR in this proceeding, were contrary to statute or rule, or otherwise unfair, inappropriate, or unethical.

6. SCE was within its rights to commence construction during the pendency of the application for rehearing of Resolution 4243-E, and its having done so does not warrant dismissal of this application.

7. The issue of the Commission's compliance with the PRA is beyond the scope of this proceeding.

8. The issue of whether the Commission improperly voted on Resolution 4243-E is beyond the scope of this proceeding.

9. SCE should be granted a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project with the mitigation identified in the MMRCP, which is attached to this decision.

10. This decision should be effective today.

11. Application 13-10-021 should be closed.

O R D E R

IT IS ORDERED that:

1. The Environmental Impact Report for the Moorpark-Newbury 66 kV Subtransmission Line Project is certified as having been completed in compliance with the California Environmental Quality Act, reviewed and considered by the California Public Utilities Commission (Commission) prior to approving the project, and reflective of the Commission's independent judgment and analysis.

2. Southern California Edison Company is granted a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project, with the mitigation identified in the Mitigation Monitoring, Compliance and Reporting Plan, which is attached to this decision.

3. Energy Division may approve requests by Southern California Edison (SCE) for minor project refinements that may be necessary due to final engineering of the Moorpark-Newbury 66 kV Subtransmission Line Project

so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the environmental document; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement. SCE shall seek any other project refinements by a petition to modify this decision.

4. Within 90 days of this order, Southern California Edison shall submit, and serve on the official service list in Application 13-10-021, an advice letter analyzing the effectiveness and feasibility of reducing electromagnetic effects at low- or no-cost by affixing insulators and conductor mounts for the Moorpark-Newbury 66 kV Subtransmission Line Project on the west side of the tubular steel poles rather than on the east side closer to homes and, if effective and feasible, amending the Field Management Plan for the project to incorporate the measure.

5. Application 13-10-021 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

Mitigation Monitoring, Reporting, and Compliance Program

Southern California Edison's
Moorpark-Newbury 66 kV
Subtransmission Line Project

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM

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

INTRODUCTION

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

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

California Public Utilities Commission – MMRCP Authority

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

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

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

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

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

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

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

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

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

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

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

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

- Air Quality
- Noise

Roles and Responsibilities

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

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

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

Enforcement and Responsibility

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

Mitigation Compliance Responsibility

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

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

Dispute Resolution Process

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

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

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

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

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

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

General Monitoring Procedures

Mitigation Monitor

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

Construction Personnel

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

- SCE shall require all contractors to comply with the conditions of project approval, including all applicable APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all APMs mitigation measures requiring their attention.

General Reporting Procedures

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

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

Public Access to Records

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

Condition Effectiveness Review

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

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

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

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

Mitigation Monitoring, Reporting and Compliance Program

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[9] *Op cit.* 6

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(END OF ATTACHMENT)

REDLINE VERSION

Decision **PROPOSED DECISION OF ALJ YACKNIN (Mailed 5/20/16)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U338E) for a Permit to Construct Electrical Facilities With Voltages Between 50 kV and 200 kV: Moorpark-Newbury 66 kV Subtransmission Line Project.	Application 13-10-021 (Filed October 28, 2013)

DECISION GRANTING PERMIT TO CONSTRUCT THE MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE PROJECT

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Attachment - Mitigation Monitoring, Reporting, and Compliance Program

DECISION GRANTING PERMIT TO CONSTRUCT THE MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE PROJECT

Summary

This decision grants Southern California Edison Company (SCE) a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project, with mitigation identified in the Mitigation Monitoring, Reporting and Compliance Plan attached to this order. As the lead agency for environmental review of the project, we find that the Environmental Impact Report for this project meets the requirements of the California Environmental Quality Act. This proceeding is closed.

1. Background

By this application, Southern California Edison Company (SCE) seeks a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project. The proposed project would provide a new 66 kV subtransmission ~~line to replace the existing 66 kV subtransmission line between~~be Moorpark and Newbury Substations, and would be located entirely within existing right-of-ways between the Cities of Moorpark and Thousand Oaks in Ventura County.

General Order (GO) 131-D exempts utilities from the otherwise-applicable requirement to obtain a permit to construct electric power line facilities with voltages between 50 kV and 200 kV pursuant to certain exemptions specified in Section III.B.1, except that the exemptions shall not apply under certain exception criteria that are specified in Section III.B.2. A utility claiming such an exemption must file an advice letter giving notice of its intent to construct the project pursuant to the exemption.

SCE originally gave notice of its plan to build the proposed project by Advice Letter 2272-E in October 2008, claiming that the project was exempt from

GO 131-D's permit requirement pursuant to Section III.B.1.g (Exemption g), which exempts projects that are "located in an existing franchise, road-widening setback easement, or public utility easements …." The advice letter was protested by local governments and local area residents and ultimately resolved by Executive Director Action Resolution E-4225, which determined that the project was indeed exempt from California Public Utilities Commission (Commission) permitting requirements.

Alan and Peggy Ludington (Ludingtons), Danalynn Pritz, and David J. Tanner appealed Resolution E-4225 in March 2009. At the County of Ventura's request, the Commission conducted an informal public participation hearing in September 2009 to provide a forum for the County, SCE, and residents to speak to the matter. On March 11, 2010, the Commission issued Resolution E-4243 dismissing the appeal based on the findings that (1) SCE complied with the notice requirements for the proposed construction of the project; (2) the project was exempt from GO 131-D's permitting requirements pursuant to Exemption g, and (3) the facts claimed by the appellants did not support a finding that the exception criteria applied. SCE commenced project construction in fall 2010.

Ludingtons filed Application (A.) 10-04-020 for rehearing of Resolution E-4243, claiming that Exemption g did not apply to the proposed project, that in any event the conditions specified in Section II.B.2 rendered Exemption g inapplicable, and that the procedures used to resolve the protests to Advice Letter 2272-E, violated our due process and our rules. On November 11, 2011, the Commission issued Decision (D.) 11-11-019, which dismissed SCE's Advice Letter 2272-E without prejudice, vacated Resolution E-4243, and ordered SCE to cease any construction activity and file

this application for a permit to construct on the basis that the rehearing application raised new factual allegations that could not be resolved in the appellate process.[1]

By this juncture, SCE had installed one tubular steel pole and constructed 700 feet of duct bank within the Moorpark Substation; constructed 24 pole foundations and installed 21 complete and one partial tubular steel poles within five miles between Moorpark Substation and the City of Thousand Oaks; evacuated holes for three pole foundations and constructed five pole foundations within three miles between the City of Thousand Oaks and near the intersection of Conejo Center Drive and Rancho Conejo Boulevard; and replaced 27 wood poles with light-weight steel poles, installed a portion of conductor, and transferred the existing lines to the new structures within the remaining one mile to Newbury Substation.

SCE filed this application for a permit to construct the proposed project on October 28, 2013, and timely protests were filed by Ludingtons, James Porter (Porter) Cheryle M. Potter and Herbert T. Potter (Potters), Donald Walker and Therese Walker (Walkers), Krista and Phillip Pederson (Pedersons), the Office of Ratepayer Advocates, and Environmental & Regulatory Specialists, Inc.

Pursuant to GO 131-D, a permit to construct is conditioned on the Commission's determination that the project complies with the California Environmental Quality Act (CEQA) and with the Commission's policies requiring the use of low-cost and no-cost measures to mitigate electric and magnetic field effects (EMF). CEQA requires the lead agency (the Commission in this case) to conduct a review to identify the environmental impacts of the project, and ways to avoid or reduce environmental damage, for consideration in

[1] D.11-11-019 rejected the Ludingtons' claims of due process and rules violations.

the determination of whether to approve the project, a project alternative, or no project. Where it is anticipated that the proposed project will create significant and unmitigable environmental impacts, then the lead agency must prepare an environmental impact report (EIR) that identifies the environmental impacts of the proposed project and alternatives, designs a recommended mitigation program to reduce any potentially significant impacts, and identifies, from an environmental perspective, the preferred project alternative.

In addition, pursuant to GO 131-D and Decision (D.) 06-01-042, the Commission will not approve a project unless its design is in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures.

The Commission's Energy Division issued the Draft EIR on June 11, 2015, and issued the Final EIR on November 4, 2015.[2]

A prehearing conference was conducted on August 13, 2015, in Thousand Oaks, California, at which time Santa Rosa Valley Estates Homeowners Association and Center for Biological Diversity (CBD) appeared and were granted party status.

Evidentiary hearing was held on January 28, 2016, in Los Angeles. SCE, CBD and, jointly, Ludingtons, Environmental & Regulatory Specialists, Inc.,[3] Santa Rosa Valley Estates Homeowners Association, Pedersons, Potters, Porter and Walker (Intervenors) filed opening briefs on March 10, 2016, and reply briefs on April 10, 2016, upon which the matter was submitted.

2. Scope of Issues

[2] The Final EIR contains comments on the Draft EIR, responses to the comments, and revisions to the Draft EIR. The EIR is comprised of both the Draft EIR and the Final EIR.

[3] Environmental & Regulatory Specialists, Inc. is represented by David J. Tanner. Although the Intervenors' brief misidentifies David J. Tanner as the party, we deem it to be jointly sponsored by Environmental & Regulatory Specialists, Inc.

The assigned Commissioner's November 13, 2015, scoping memo identifies the following issues to be determined in this matter:

1. What are the significant adverse environmental impacts of the proposed project? This issue encompasses consideration of whether the project design comports with Commission rules and regulations and other applicable standards governing safe and reliable operations.
2. Are there potentially feasible mitigation measures or project alternatives that will avoid or lessen the significant adverse environmental impacts? This issue encompasses consideration of how to design the proposed project in a manner that ensures its safe and reliable operations.
3. As between the proposed project and the project alternatives, which is environmentally superior?
4. Are the mitigation measures or project alternatives infeasible?
5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable adverse environmental impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed project or project alternative?
6. Was the EIR completed in compliance with CEQA, did the Commission review and consider the EIR prior to approving the project or a project alternative, and does the EIR reflect our independent judgment?
7. Is the proposed project and/or project alternative designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures?
8. Should the application be dismissed on the basis that SCE and Commissioners or Commission staff engaged in (1) private communications between SCE and Commissioners' personal advisors during the pendency of A.10-04-020, (2) private communications between SCE and Commissioners' personal advisors during the pendency of

the informal appeal of Resolution E-4225,[4] (3) private communications between SCE and the Commission's General Counsel during the pendency of A.10-04-020, and/or (4) communications between SCE and environmental consultants for the Commission's Energy Division regarding SCE's preparation of the Proponent's Environmental Assessment for this application?

3. Environmental Impacts of Proposed Project

The proposed project would consist of the following main components:

- Installation of approximately 500 feet of new underground 66 kV subtransmission line and a new line position in the 66 kV switchrack entirely within Moorpark Station.

- Installation of two tubular steel pole foundations, four tubular steel poles, the upper portion of one tubular steel pole, and approximately five miles of conductor on new and existing tubular steel poles along the new Moorpark-Newbury 66 kV subtransmission line on the south and east sides of SCE's existing Moorpark-Ormond Beach 220 kV right-of-way.

- Installation of eight tubular steel foundations, 13 double-circuit tubular steel poles, and approximately two miles of conductor on the new Moorpark-Newbury 66 kV subtransmission line, and reconductoring of two miles of the Moorpark-Newbury-Pharmacy 66 kV subtransmission line. The two subtransmission lines would be collocated on the new double-circuit tubular steel poles, and 14 existing lattice steel towers along this two-mile segment would be removed.

- Installation of approximately one mile of conductor in order to collocate the two subtransmission lines on previously installed lightweight steel poles into Newbury Substation. In addition, four tubular steel pole

[4] The scoping memo inadvertently refers to the informal appeal of Resolution E-4243. The correct reference is to Resolution E-4225, which was resolved by Resolution E-4243. Resolution E-4243 was formally appealed by A.10-04-020, which was resolved by D.11-11-019.

> foundations, four tubular steel poles, two lightweight steel poles, and a new 66 kV subtransmission line position would be installed, and six wood poles would be removed, at Newbury Substation.

The proposed project would have significant and unavoidable impacts on air quality and noise during project construction. Construction-related daily exhaust emissions of NOx would exceed the applicable significance threshold, resulting in emissions that could contribute to a violation of ozone air quality standards, which would be individually significant as well as cumulatively considerable. Construction-related activities would generate noise levels that would exceed the Ventura County construction noise threshold criteria, and nighttime construction–related activities would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.

The proposed project would not have any significant environmental impacts on aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic that cannot be mitigated to a less-than-significant level with the mitigation measures identified in the Mitigation Monitoring, Reporting and Compliance, and Program (MMRCP).

The proposed project would have no impact or a less-than-significant impact on agriculture and forestry resources, energy conservation, geology and soils, greenhouse gas emissions, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.

4. Project Alternatives

CEQA requires the consideration of a range of reasonable project alternatives to the proposed project that would feasibly attain most of the basic

objectives of the project and avoid or substantially lessen any of the significant effects of the project.

The EIR identifies the following project objectives:

- Meet forecasted electrical demand in the Electrical Needs Area (ENA).
- Maintain sufficient voltage in accordance with applicable requirements.
- Maintain system reliability within the ENA.
- Utilize and manage existing right-of-way in a prudent manner.
- Maintain consistency with the Garamendi Principles (Senate Bill 2431, Stats. 1988, Ch. 1457).
- Maintain consistency with GO 95's rules for overhead electric line construction.
- Design and construct the project in conformance with SCE's applicable engineering, design, and construction standards.

The EIR screened six project alternatives (and a combination of two of those alternatives), but determined that none would both feasibly attain most of the basic project objectives and avoid or substantially lessen the proposed project's significant effects. Alternative 1 (reconductoring) would result in the projected overload of the Moorpark-Newbury tap in 2023[5] and voltage violations at Newbury Substation in 2015. Alternative 2 (realignment of a portion of the Moorpark-Ormond Beach line) would be inconsistent with GO 95 pertaining to unnecessary crossings of existing transmission lines and would not conform to

[5] Citing to the Draft EIR, CBD incorrectly asserts that the EIR identifies the projected overload as occurring in 2026. (CBD opening brief, p.9.) The Final EIR revised this projection to 2023. (Final EIR, pp. 3.1-9 and 4-12.)

SCE's engineering, design, and construction standards, and it would result in greater environmental impacts than the proposed project. Alternative 3 (collocation with existing Moorpark-Newbury-Pharmacy line) failed because it would result in greater environmental impacts than the proposed project. Alternative 4 (reconnect the Camgen Generator) would result in projected voltage violations at Newbury Substation in 2015.[6] Alternative 1 combined with Alternative 4 would result in the projected overload of the Moorpark-Newbury tap in 2023 and voltage violations at Newbury Substation in 2015. Alternative 5 (demand-side management) would not serve projected demand or reliability objectives and is not feasible on a scale that would be suitable to replace the proposed project within a reasonable period of time. Alternative 6 (renewable and distributed generation energy resources) would still require upgraded or new subtransmission and transmission infrastructure, there is limited potential for local renewable resources or distribute generation to meet the projected demand or reliability objectives for the projects, and it would potentially result in greater environmental impacts than the proposed project.

CEQA also requires the evaluation of the "no project" alternative. The EIR evaluated two "no project" alternatives.

Under the No Project Alternative 1, the proposed project would not be built, and all of the infrastructure already constructed for the project would remain in place. The No Project Alternative 1 would have no impact for all resource areas.

Under the No Project Alternative 2, the proposed project would not be built, and the infrastructure already constructed for the project would be removed (with the exception of the previously installed lightweight steel poles

[6] Intervenors incorrectly assert that the EIR eliminated this alternative because of the possibility of insufficient right–of-way. (Intervenors opening brief, p.36.)

and energized conductor and, at SCE's discretion, the infrastructure already installed at Moorpark and Newbury Substations). The No Project Alternative 2 would have significant and unavoidable impacts on air quality and noise during deconstruction similar to, but slightly less than, those of the proposed project. The No Project Alternative 2 would have similar or lesser impacts than the proposed project in all other resource areas.[7]

5. Environmentally Superior Alternative

Pursuant to CEQA Guidelines § 15126.6(e)(2), if the EIR identifies the "no project" alternative as the environmentally superior alternative, it must "also identify an environmentally superior alternative among other alternatives." The EIR identifies the No Project Alternative 1 as the environmentally superior alternative because it would avoid any environmental impacts. The EIR analyzed a range of alternatives, but did not identify any that could feasibly accomplish most of the basic objectives of the proposed project and could avoid or substantially lessen one or more of the significant effects. Therefore, the proposed project is the environmentally superior alternative apart from the "no project" alternatives.

6. Certification of EIR

CEQA requires the lead agency to certify that the EIR was completed in compliance with CEQA, that the agency has reviewed and considered it prior to approving the project, and that the EIR reflects the agency's independent judgment.

[7] Citing to Table 6-1 summarizing *significant and unavoidable* environmental impacts of the proposed project and alternatives, Center for Biological Diversity (CBD) incorrectly asserts that the EIR finds that the No Project Alternative 2 would have the same impacts as the proposed project. (CBD opening brief, p.8.) To the contrary, as shown in Table 6-2 summarizing *all* environmental impacts, the EIR finds that the No Project Alternative 2 would have slightly less impacts than the proposed project in most resource areas.

Energy Division issued the Draft EIR for public review and comment on June 11, 2015, and provided notice of the public review period and public meeting on June 24, 2015, in Thousand Oaks to public agencies, adjacent property owners and occupants, the official service list for this matter, and agencies, organizations, and individuals that submitted comments on the Notice of Preparation for the EIR, and published public notices on June 11 and 20, 2015, in the local newspaper. Public comments were taken from at least 18 speakers at the public meeting, and Energy Division received written comments from approximately 170 individuals and organizations during the comment period, which ended July 27, 2015, and six written comments between September 2 and October 18, 2015, after the comment period had ended.

The Final EIR documents all comments made on the Draft EIR, and responds to them, as required by CEQA.[8] The EIR identifies the proposed project's significant and unavoidable environmental impacts, mitigation measures that will avoid or substantially lessen them, and the environmentally superior alternative. We have reviewed and considered the information contained in the EIR, as well as parties' challenges to the adequacy of the EIR as discussed below. We certify that the EIR was completed in compliance with CEQA, we have reviewed and considered the information contained in it, and we certify that it reflects our independent judgment and analysis.

6.1. Project Description and Baseline

Intervenors and CBD assert that the EIR is inadequate because it includes SCE's past construction of the power line as part of the baseline conditions and excludes the past construction from the project description. To the contrary, the

[8] The Final EIR responds to the late comments but, due to publishing constraints resulting from their lateness, does not include them in the document.

EIR's definition of baseline conditions fully complies with CEQA. CEQA Guidelines § 15125(a) provides:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.

There is no reasonable dispute that the physical environmental conditions in the vicinity of the project, as they existed at the time the notice of preparation was published, included SCE's past construction.

CBD asserts that, pursuant to CEQA Guidelines § 15125(a), the proper baseline is conditions at the time SCE filed Advice Letter 2272-E because the Commission engaged in environmental analysis "when it determined that a CEQA exemption was applicable." (CBD opening brief, p.15.) CBD mistakenly confounds exemption from CEQA with inapplicability of CEQA. CEQA only applies to "projects," which are defined in relevant part as "an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." (CEQA Guideline § 15378(a)(3).) A CEQA "project" may nevertheless be exempt from CEQA review under a number of exemptions contained in CEQA Guidelines §§ 15250 through 15333. However, if an activity does not require a permit, it is not a "project" subject to CEQA in the first place. Here, SCE's advice letter was not an application for a permit, and the Commission's inquiry at the time SCE filed its advice letter was

not whether construction of the Moorpark-Newbury 66 kV Transmission Line was exempt from CEQA review. Rather, the Commission's inquiry was whether the construction was exempt from GO 131-D's permitting requirements such that it was not a "project" and therefore not subject to CEQA in the first place. Resolution E-4225 affirmed, and Resolution E-4243 reaffirmed, that the activity did not require a permit pursuant to GO 131-D. As it did not require a permit, the activity was not a "project" and was not subject to CEQA.

Intervenors and CBD maintain that D.11-11-019's subsequent dismissal of Advice Letter 2272-E and vacation of Resolution E-4243 constituted the Commission's "acknowledging the mistake it made" in granting its "wrongly issued approval" for the "illegal construction." (CBD opening brief, p.15; Intervenors' opening brief, p.73.) To the contrary, D.11-11-019 expressly stated that it did not make any decision as to whether SCE required a permit pursuant to GO 131-D. (D.11-11-019 at 2, 20.) To be sure, by D.11-11-019's order directing SCE to cease construction and apply for a permit to construct the power line, additional power line construction thereupon became a "project" under CEQA because it thereupon became "an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." (CEQA Guidelines § 15378(a).) Nevertheless, the Commission's post-hoc order requiring SCE to obtain a permit to construct the power line cannot be held to transform the prior construction into an illegal activity under CEQA.

In any event, whether or not the prior construction was illegal makes no difference for purposes of the CEQA analysis. The general rule that ongoing activities should be treated as part of the baseline applies equally when the project includes renewal of a permit for an existing facility, even though the

facility was not previously reviewed under CEQA. (*Citizens for East Shore Parks v. California State Lands Comm'n* (2011) 202 Cal.App.4th 549, 557-558.) It also applies when the existing physical conditions violate current regulatory provisions. (*Id.* at 559; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452-1453; *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1270; *Eureka Citizens for a Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 371.)

Intervenors and CBD assert that the past construction must be included in the EIR's project description because it is part of the Moorpark-Newbury 66 kV subtransmission line and therefore part of the "whole of the action" as CEQA Guidelines § 15378 defines the term "project." (CBD opening brief, p.5.) They assert that the EIR instead improperly divides the project into parts, contrary to CEQA Guidelines § 15069 and its interpretation in Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263 and its progeny. To the contrary, CEQA Guidelines § 15069 and its prohibition against "piecemealing" a project into its parts concerns future activities, not past activities that are properly included in the project baseline as was the case in Fat, Riverwatch and Eureka Citizens.[9]

Intervenors cite to *Laurel Heights Improvement Association v. Regents of University of California* (1988) 47 Cal.3d 396, for the proposition that the "whole of the project" should encompass SCE's "master plan" for the Big Creek-Ventura area, including any projects affecting the Thousand Oaks, Moorpark and Newbury Park communities including the substations, transmission lines and

[9] CEQA Guidelines § 15069 provides, "Where individual projects are, or a phased project is, ☼ *to be undertaken* and where the total undertaking comprises a project with significant environmental effect, the lead agency must prepare a single EIR for the ultimate project." (Emphasis added.)

right-of-ways that serve them, as well as SCE's 2015 Distributed Resources Plans, its proposed Puente Power Plant in Oxnard, its improvement and reconductoring of the Colonia substation and line, any pole replacement and reconductoring under the Pole Loading Program, SCE's 2014 Energy Storage Procurement Plan, and SCE's rooftop solar projects under Assembly Bill 327. (Intervenors opening brief, pp. 70-71.) To the contrary, Laurel Heights holds that "an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. Absent these two circumstances, the future expansion need not be considered in the EIR for the proposed project." (Laurel Heights at 396.) Intervenors do not show that any of these activities are a reasonably foreseeable consequence of the Moorpark-Newbury 66 kV subtransmission line, and there is no basis for us to assume otherwise.

CBD maintains that the EIR must review the prior construction because D.11-11-019 directed SCE to file this application "if it wishes to build the power line described in Advice Letter 2272-E" and the past construction is part of that power line. We do not interpret this language to have us engage in a fiction in which the past construction has not occurred, or to have us deviate from established precedent with regard to the scope of CEQA review as discussed above.

6.2. Project Objectives

Intervenors argue that the EIR is flawed because the Draft EIR's project objectives deviated from the project description in Advice Letter 2272-E, and because the Final EIR's project objectives deviated from the Draft EIR by

identifying potential new voltage violation scenarios in response to SCE comments on the Draft EIR. Intervenors cite to *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193, and *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 818 for the proposition that the EIR's project description should be deemed inadequate for this reason. (Intervenors opening brief, pp.61-64.) Intervenors are mistaken; the project objectives are the same in Draft and Final EIRs. (Compare Draft EIR, p. 1-3 and Final EIR, p. 3.1-4.) Intervenors mischaracterize the Final EIR's response to comment O9-1 as altering the second project objective[10] by "add[ing] a third violation criterion: 'overload on the Thousand Oaks 66 kV line beginning in 2015 during an N-1 abnormal system condition." (Intervenors' opening brief, p.64.) To the contrary, the response does not alter the project objective; rather, it notes SCE's comment that identifies this additional voltage criteria violation under SCE's most recent 10-year forecast. (Final EIR, Response O9-1, p.3.2-93.) Intervenors offer no rational basis for concluding that the EIR is flawed for acknowledging this information, and none is apparent.

6.3. Cumulative Impacts

The Final EIR revises the Draft EIR's discussion of "CPUC Procedural Activities" (Section 2.2) to clarify that past construction activities are considered in the analysis of cumulative effects (Chapter 7) to the extent that they are causing continuing impacts that could combine with those of the proposed project. (Final EIR, Master Response 4, p. 3.1-24.) However, as Intervenors point out, the Final EIR did not carry this clarification through to Chapter 7 itself. Accordingly, Energy Division issued an errata on April 21, 2016, revising Chapter 7 to comport with the response to comment.

[10] "Maintain sufficient voltage in accordance with applicable requirements."

6.4. Electrical Needs Area

The EIR defines the Electrical Needs Area (ENA) to be served by the proposed project as the customers served by the Newbury and Pharmacy Substations. Intervenors assert that the ENA "was intentionally designed to ignore the favorable impact of the interrelatedness between Newbury Substation and adjacent substations," and that it should instead be defined as the customers served by the Newbury, Thousand Oaks and Potrero Substations because the Pharmacy Substation cannot be considered in determining reliability, Thousand Oaks Substation's load growth has factored into SCE's load growth forecast,[11]

and Thousand Oaks and Potrero Substation are logically related to the Moorpark system grid. (Intervenors opening brief, pp. 35 and 81.) Intervenors' assertion is without merit. The EIR properly defines the ENA as the customers served by the Newbury and Pharmacy Substations because these are the customers whose service would be directly at risk of disruption if an outage were to occur on the Moorpark-Newbury-Pharmacy line. Furthermore, the definition of the ENA does not – and did not in this case – restrict consideration of the interrelatedness of facilities outside of the ENA in the evaluation of project alternatives: The EIR considered the related Newbury-Thousand Oaks line when it identified and analyzed Alternative 1, which would reconductor both the Moorpark-Newbury-Pharmacy line and the Newbury-Thousand Oaks line. (Draft EIR, p. 4-7.)

6.5. Public Safety Hazards

[11] Intervenors charge SCE with manipulating its load growth forecast by adding ¤ Thousand Oaks Substation's projected load growth to its 2015-2024 forecast. (Intervenors' opening brief, p.64.) To the contrary, all of the power flow forecasts that SCE has provided in this proceeding (i.e., 2013-2022, 2014-2023, and 2015-2023) have included load forecast data for Thousand Oaks Substation. (*See* Proponent's Environmental Assessment, Attachments B, C, and D, and SCE responses to CPUC Data Requests 3 and 6.)

Intervenors assert that the EIR failed to give due consideration to public safety concerns raised in comments on scoping and the Draft EIR. To the contrary, the very citations that intervenors reference in support of this proposition demonstrate that the Final EIR appropriately summarizes and responds to all such comments. (Final EIR, pp. 3.3-116, 127-130.) We reiterate CEQA Guideline § 15151 which states in part, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."

6.6. Peak Load Growth Forecasts

Intervenors and CBD challenge the EIR for using SCE's peak load growth forecast, which they assert is overstated and unsupported.[12] To the contrary, as the Final EIR explains, the EIR reasonably relied upon SCE forecasts after independent review by its environmental consultant and electrical transmission planning consultant. (Final EIR, Master Response 5, pp. 3.1-25 through 3.1-28.) The EIR comports with CEQA Guidelines § 15144 that, while recognizing that "foreseeing the unforeseeable is not possible," an agency is required to "use its best efforts to find out and disclose what it reasonably can."

6.7. Alternatives

CBD challenges the EIR for rejecting Alternatives 1, 4, 1+4, 5 and 6 in part because they would result in voltage violations; CBD asserts that such violations can be resolved by not re-energizing the Pharmacy Substation following an N-1 of the Moorpark-Newbury-Pharmacy line. (CBD opening brief, pp. 9-10.) To the contrary, as discussed in greater detail in Part 8 ("Overriding Considerations") below, SCE is obligated to re-energize Pharmacy Substation following an outage

[12] Intervenors object to SCE's peak load growth forecast for using "normal" peak demand instead of "low" or "no" growth. (Intervenors' opening brief, p.48.) We note that, to the contrary, SCE's 2014-2023 and 2015-2024 forecasts used "likely case" peak data, not "normal" peak demand data. (*See* Final EIR, Master Response 5, p. 3.1-28.)

of the Moorpark-Newbury-Pharmacy line. CBD also asserts that such violations can be resolved by installing more reactive power at the Newbury Substation and transferring some load from the Newbury Substation to adjacent substations. (*Id.)* CBD does not cite to any record evidence for this proposition in violation of Rule 13.11, and it is not apparent what CBD means by installing more reactive power at Newbury Substation. However, we note that the EIR evaluated the option of implementing a power storage facility at Newbury Substation (Final EIR, Appendix G, p.7) and of transferring some load from the Newbury Substation to adjacent substations (*id*., pp. 1-2) and explains why they were determined not to be feasible.

CBD suggests that battery storage is a viable project alternative because, contrary to SCE's argument in its opening brief that it would only provide two of the four hours that SCE considers to be necessary during an N-1 condition at peak demand, SCE witness McCabe allegedly "admitted" under cross-examination that a four-hour battery could be used. (CBD reply brief, pp. 4-5, citing to RT 157-158, 160.) CBD mischaracterizes and obfuscates the testimony. Witness McCabe merely agreed that "it is possible that there would be a battery that would have a four-hour duration," and his testimony on page 159, which CBD omitted from its citation, explains that the battery described in CBD's hypothetical would not be sufficient to serve the requisite load. In any event, the EIR considered the potential for electricity storage as a project alternative in response to comments, and reasonably concluded that it is not. (*See* Final EIR, Master Response 1, pp. 3.1-6 through 3.1-8, addressing electricity storage in the context of demand-side management and distributed energy generation alternatives; Response I50-3, p.3.3-222, regarding thermal energy

storage; and Appendix G, p.7, regarding general storage equipment at Newbury Substation.)

CBD suggests that voltage support devices are a viable project alternative because, contrary to SCE's argument in its opening brief that it risks creating an excessive overvoltage situation, witness McCabe allegedly acknowledged under cross-examination that concern to be a "red herring." (CBD opening brief, p.6, citing to RT 160-161.) To the contrary, in the testimony to which CBD cites, witness McCabe merely agreed that capacitors can be set to automatically switch off when a high-voltage condition is detected, and that automatic switches have the ability to energize and de-energize capacitor banks in a fraction of a second. We do not conclude from this testimony that voltage support devices are therefore a viable project alternative to the proposed project. Furthermore, we remind CBD that the time and place for suggesting additional project alternatives beyond those assessed in the Draft EIR was in comment on the Draft EIR.
(*See* June 11, 2015, Administrative Law Judge's (ALJ) Ruling; Assigned Commissioner's Scoping Memo.) We are not aware of any such comment with regard to the viability of voltage support devices as a project alternative, and CBD's testimony on this subject is untimely. In any event, we are persuaded by SCE witness McCabe's rebuttal testimony that concludes, based on SCE's investigation of a range of seven hypothetical capacitor-based options and consideration of space at the existing facilities, such alternative is not feasible. (SCE/McCabe, Exhibit 9, pp. 10-23.)

Intervenors suggest that the EIR is flawed for failing to evaluate SCE's "Operational Excellence" program as a project. (Intervenors opening brief, pp. 28-29.) To the contrary, as discussed more fully in Part 7.8 ("Independent

Judgment and Analysis") below, the Final EIR evaluated the alternative in response to Ludingtons' late comment on the Draft EIR identifying this potential alternative, and the EIR provides a sufficient explanation of why it did not qualify for full evaluation. (Final EIR, Appendix G.)

6.8. Independent Judgment and Analysis

Intervenors assert that "the Final EIR appears to accept every assertion of SCE, without meaningful independent assessment," specifically with regard to its rejection of project alternatives and its electrical demand and need projections. (Intervenors opening brief, p.86.) To the contrary, as evidenced by the response to comments challenging the Draft EIR, the EIR presents a fair and impartial assessment of these issues. (*See* Final EIR, Master Responses 1 and 5, Responses I50-12 through I50-34, and Response O9-11.)

Intervenors assert that the EIR does not reflect the Commission's independent judgment, and is biased, because Energy Division's project manager was staff on Advice Letter 2272-E and the resolutions affirming that the project was exempt from GO 131-D's permitting requirements. To the contrary, the project manager's prior involvement in the determination of whether the proposed project was exempt from GO 131-D's permitting requirements does not reasonably create the appearance of bias, much less demonstrate it, and such suggestion is belied by the substance of the EIR.

Intervenors assert that the EIR is biased because, previously, in SCE's application for a permit to construct the Presidential Substation project (A.08-12-023), the Energy Division's consultants had determined that the Presidential Substation project did not include the Moorpark-Newbury project, notwithstanding public demand to the contrary. To the contrary, the consultants' prior determination regarding the project description in A.08-12-023

does not reasonably create the appearance of bias, much less demonstrate it, and such suggestion is belied by the substance of the EIR.

Intervenors assert that the failure to include Ludington's late comment letters in the Final EIR or to analyze the new information provided in them "seems a gross dereliction" of the Commission's duty to explore alternatives and demonstrates bias. (Intervenors' opening brief, pp. 88-89.) To the contrary, as stated in the Final EIR, the 45-day comment period concluded on July 27, 2015, and Ludingtons' late comment letters were received on September 2, 9, and 24, and October 12, 16, and 18, 2015, making it infeasible to include the comments in the Final EIR and publish the Final EIR on a reasonable schedule. Furthermore, the Final EIR does in fact evaluate the late comments and provides a sufficient explanation of why the numerous additional proposed project alternatives did not qualify for full evaluation and that the new information did not identify new issues or more severe impacts that would change any EIR findings. (Final EIR, Appendix G.) We reiterate that disagreement among experts does not make an EIR inadequate; nor does it demonstrate bias.

7. Infeasibility of Proposed Project and Mitigation Measures

CEQA Guidelines §15091(a) prohibits an agency from approving a project for which an EIR has been certified and which identifies one or more significant environmental effects of the project unless (1) the project incorporates changes that avoid or substantially lessen the project's significant environmental impacts, (2) such changes are within the responsibility and jurisdiction of another agency who can or will adopt them, or (3) such changes are infeasible. In this case, with the mitigation identified in the MMRCP the proposed project will avoid all significant environmental impacts other than air quality and noise impacts

during project construction. No party asserts that any of the identified mitigation is infeasible and we have no reason to find otherwise.

8. Overriding Considerations

Pursuant to CEQA Guidelines § 15093, the Commission may only approve a project that results in significant and unavoidable impacts if it finds that there are benefits to the project that outweigh the unavoidable adverse environmental impacts and makes a statement of overriding considerations to that effect.

The proposed project would enable SCE to avoid a projected violation of applicable voltage criteria beginning in 2015 at Newbury and Pharmacy Substations, and overload on the Newbury-Thousand Oaks line,[13] under N-1 abnormal system conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation. It would also avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024.

Intervenors and CBD argue that the project is not needed because the potential voltage criteria violation can be avoided by leaving Pharmacy Substation and its industrial customer off-line for the duration of the N-1 event. To the contrary, system planning based on the targeted load interruption to one customer in order to provide other customers continued service would be a violation of SCE Tariff Rule 14.C, which requires in the event of a supply shortage that SCE apportion its electricity supply in an equitable manner.

Intervenors and CBD argue that SCE's planning criteria sanction such an approach because it allows for load interruptions at facilities served by a single subtransmission system component. SCE counters that the provision does not contemplate a wholesale interruption of the load served by the facilities, but only

[13] The Final EIR identified the overload on the Newbury-Thousand Oaks line beginning in 2015 during an N-1 abnormal system condition. (Final EIR, Response O9-1, p. 3.2-93.)

a brief interruption of service where at least some of the load can be accommodated by other distribution circuit connections during the N-1 event, which is not possible in this instance. We agree that a contrary conclusion would violate Tariff Rule 14.C and principles of fundamental fairness and equal protection.

9. Electric and Magnetic Fields Mitigation

The Commission has examined EMF impacts in several previous proceedings.[14] We found the scientific evidence presented in those proceedings was uncertain as to the possible health effects of EMFs and we did not find it appropriate to adopt any related numerical standards. Because there is no agreement among scientists that exposure to EMF creates any potential health risk, and because CEQA does not define or adopt any standards to address the potential health risk impacts of possible exposure to EMFs, the Commission does not consider magnetic fields in the context of CEQA and determination of environmental impacts.

However, recognizing that public concern remains, we do require, pursuant to GO 131-D, Section X.A, that all requests for a permit to construct include a description of the measures taken or proposed by the utility to reduce the potential for exposure to EMFs generated by the proposed project. We developed an interim policy that requires utilities, among other things, to identify the no-cost measures undertaken, and the low-cost measures implemented, to reduce the potential EMF impacts. The benchmark established for low-cost measures is 4 percent of the total budgeted project cost that results in an EMF reduction of at least 15 percent (as measured at the edge of the utility right-of-way).

[14] *See* D.06-01-042 and D.93-11-013.

SCE filed a detailed Field Management Plan (FMP) as Appendix F to its application, based on the proposed project. The FMP provides that the project will utilize subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria, arrange conductors of subtransmission line for magnetic field reduction, and utilities double-circuit construction that reduces spacing between circuits as compared with single-circuit construction. In addition, SCE will place new electrical equipment away from the Moorpark Substation property lines closest to populated areas.

Intervenors argue that, in identifying potential no-cost and low-cost measures, SCE should have assumed the existing 220 kV Moorpark-Ormond Beach 220 kV line's current status of limited energization (as the current peaker Mandalay and Ormond Beach Power Plants are being decommissioned and the proposed Puente Power Plant is designed as a peaker). We find it more prudent to plan for the potential maximization of the line's use when identifying measures to reduce EMF effects.

Intervenors argue that SCE should have analyzed affixing insulators and conductor mounts on the west side of the tubular steel poles rather than on the east side closer to homes. SCE witness Hung testified at hearing that the effect of this small shift on EMF reduction would be negligible, and he raised questions about whether it would inhibit safe maintenance access to poles and towers. (SCE/Hung, RT 92-106.) Nevertheless, Intervenors' suggestion appears to have the potential to reduce EMF effects at little or no cost, and there is not sufficient evidence to conclude that it would in fact inhibit access. It is reasonable for SCE to analyze the potential measure and implement it if it is found to be feasible and low- or no-cost. We therefore direct SCE to perform the analysis, and to submit

an advice letter reporting on its results and, if appropriate, amending its FMP to incorporate the measure.

Intervenors argue that SCE should have analyzed the EMF effects of constructing the project on the west side of the Moorpark-Ormond Beach right-of-way (Alternative 2) or any other of the EIR alternatives. We reject these arguments as moot as the EIR has found the alternatives not to be feasible.

We find that the FMP complies with the Commission's EMF decisions, except that we direct SCE to submit an advice letter no later than 90 days after the effective date of this decision reporting on the results of its analysis of whether affixing insulator and conductor mounts to the west side of project poles are a low- or no-cost measure for reducing EMF effects and, if so, amending the FMP accordingly.

10. SCE's Communications with Advisors, Staff, and General Counsel During Pendency of Prior Proceedings and EIR

Intervenors, supported by CBD, assert that this application warrants dismissal due to the following undisputed contacts between SCE and Commission staff:

- During the pendency of the informal appeal of Resolution E-4225, SCE representatives communicated with then-President Peevey's personal advisor Carol Brown (and perhaps other Commissioners' personal advisors) regarding the status of its discussions with the County of Ventura regarding the Moorpark-Newbury power line project.

- During the pendency of the informal appeal of Resolution E-4225, SCE representatives provided technical information regarding the project to Energy Division engineering staff.

- During the pendency of A.10-04-020, the formal application for rehearing of Resolution 4243-E, an SCE representative communicated its intention to commence, and status of, project construction to Energy Division manager
Ken Lewis.

- During the pendency of A.10-04-020, an SCE representative communicated to Commission General Counsel that project construction had commenced.

- Energy Division staff and consultants advised SCE regarding preparation of the Proponent's Environmental Assessment (PEA), and requested and received responses to data requests regarding the PEA.

Intervenors label these communications as unfair, inappropriate, and unethical, warranting dismissal of the application. Intervenors concede that the communications violate no rule or statute. However, they contend that the communications are nevertheless unfair, inappropriate, and unethical. (Intervenors' opening brief, pp. 96-103.) To the contrary, statute and rule clearly delineate between permissible and impermissible communications regarding Commission matters, and we do not presume to challenge that delineation here. There is no prohibition under any circumstances against private substantive communications between regulated utilities or any interested persons and Energy Division staff or the General Counsel, and communications with Commissioners' personal advisors is only prohibited in formal proceedings that have been categorized as adjudicatory (and is permitted, but must be reported, in formal proceedings that have been categorized as ratesetting). Public Utilities Code (Pub. Util. Code) §§ 1701.1 et seq.; Rule 8.1 et seq.) The advice letter process, by definition, is not a formal proceeding and, consistent with Rule 8.3(g), the restrictions (or lack thereof) that attended the informal process

underlying Advice Letter 2272-E applied to A.10-04-020, the formal application for rehearing of Resolution 4243-E. These communications do not warrant dismissal of this application.

Intervenors assert that the communications between SCE and Energy Division and its consultants regarding the sufficiency of the PEA, and Energy Division's "collegial" data requests to SCE served to inappropriately "coach" and "collaborate with" SCE in "correcting and perfecting data and power flow analyses," warranting dismissal of the application. (*Id.*, pp.104-108.) To the contrary, Energy Division and its consultants independently, objectively, and rigorously tested the need for and alternatives to the proposed project, as demonstrated by the CEQA administrative record and the Commission's commissioning of a third-party electrical consultant to evaluate the electrical data provided by SCE. The Intervenors' allegations are without merit.

11. Other Issues

Intervenors raise three additional issues in context of the private communications between SCE and Commission staff. First, Intervenors' conjecture, on the one hand, that no one involved in the rehearing process at the Commission was aware of the start of construction (*id.*, pp. 93-94)[15] while asserting, on the other hand, that the Commission's General Counsel was aware of the construction during the Commission's ongoing legal review (*id.*, pp.100-101). In the context of these communications (or lack thereof), Intervenors assert that it was unfair, inappropriate and unethical for SCE to have proceeded with construction, warranting dismissal of the application.
We disagree. By statute and rule, the application for rehearing of

[15] Intervenors note SCE's testimony that it kept Energy Division staff apprised of its project construction, but do not offer any basis for conjecturing that staff did not communicate this information to Legal Division. (*Id.*, p. 94.)

Resolution E-4243 did not stay the resolution. (Pub. Util. Code § 1733, Rule 16.1(b).) We further note that the Commission recognized that SCE may have already proceeded with construction when it ordered SCE to cease it. (D.11-11-019, ordering paragraph 5.) SCE was within its rights to commence construction during the pendency of the application for rehearing of Resolution 4243-E, and its having done so does not warrant dismissal of this application.

Second, Intervenors assert that the Commission inappropriately resisted their Public Records Act (PRA) requests for project-related communications between the Commission and SCE, which contaminated this proceeding and contributed to the circumstances warranting dismissal of the application. (*Id*., pp. 91-92.) The issue of the Commission's compliance with the PRA is well beyond the scope of this proceeding.

Lastly, Intervenors assert that it was unfair, inappropriate and unethical for the Commission to have voted on Resolution 4243-E notwithstanding alleged representations by President Peevey's personal advisor Carol Brown that the Commission would not vote on the item until the public's concerns were satisfied, warranting dismissal of this application. (*Id*., pp. 96-99.) The issue of whether the Commission improperly voted on Resolution 4243-E is well beyond the scope of this proceeding.

12. Comments on Proposed Decision

The proposed decision of ALJ Hallie Yacknin in this matter was mailed to the parties in accordance with Pub. Util. Code § 311 and comments were allowed pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on June 8, 2016, by SCE, Intervenors, and CBD, and reply comments were filed on June 14, 2016, by SCE and Intervenors. Intervenors' and CBD's comments asserting error are without merit. SCE's comments identify a minor factual error in the proposed decision's project description, and we correct it. No other changes are made to the proposed decision.

13. Assignment of Proceeding

Carla Peterman is the assigned Commissioner and Hallie Yacknin is the assigned ALJ in this proceeding.

Findings of Fact

1. The proposed project would have significant impacts on air quality and noise during project construction that can be reduced, but not avoided, with mitigation identified in the MMRCP.

2. The proposed project would not have any significant environmental impacts on aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic that cannot be mitigated to a less-than-significant level with the mitigation measures identified in the MMRCP.

3. The proposed project would have no impact or a less-than-significant impact on agriculture and forestry resources, energy conservation, geology and soils, greenhouse gas emissions, land use and planning, mineral resources,

population and housing, public services, recreation, and utilities and service systems.

4. There are no alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project.

5. The No Project Alternative 1 would have no impact for all resource areas.

6. The No Project Alternative 2 would have significant and unavoidable impacts on air quality and noise during deconstruction similar to, but slightly less than, those of the proposed project, and similar or lesser impacts than the proposed project in all other resource areas.

7. The proposed project is the environmentally superior project alternative.

8. The proposed project and its identified mitigation measures in the MMRCP are not infeasible.

9. The proposed project would enable SCE to avoid a currently projected violation of applicable voltage criteria in 2015 at Newbury Substation under N-1 conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation, and to avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024.

10. SCE's FMP incorporates many feasible no-cost and low-cost measures to reduce potential EMF impacts by utilizing subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria, arranging conductors of subtransmission line for magnetic field reduction, and utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit construction and, at the Moorpark Substation, placing new electrical equipment away from the substation property lines closest to populated areas.

11. Affixing insulator and conductor mounts to the west side of project poles, rather than the east side, may be a feasible and effective low- or no-cost measure for reducing EMF effects.

Conclusions of Law

1. The EIR was completed in compliance with CEQA.

2. The EIR reflects the Commission's independent judgment and analysis on all material matters.

3. The project benefits of enabling SCE to avoid a projected violation of applicable voltage criteria in 2015 at Newbury Substation under N-1 conditions, in which SCE would likely be obliged to shed some of the load served by Newbury Substation, and to avoid a projected overload under base case conditions on the Moorpark-Newbury-Pharmacy line beginning in 2024 are overriding benefits that merit project approval notwithstanding its significant and unavoidable impacts on air quality and noise during project construction.

4. SCE should analyze whether affixing insulator and conductor mounts to the west side of project poles are a feasible and effective low- or no-cost measure for reducing EMF effects and, if so, amend the FMP accordingly. SCE's FMP otherwise comports with the Commission's policies regarding the mitigation of EMF effects.

5. None of the private communications between SCE and Commissioners' personal advisors, General Counsel, staff and consultants during the pendency of Advice Letter No. 2272-E, the informal appeal of Resolution E-4225, or A.10-04-020 formally appealing Resolution E-4243, or during the preparation of the Proponents Environmental Assessment or EIR in this proceeding, were contrary to statute or rule, or otherwise unfair, inappropriate, or unethical.

6. SCE was within its rights to commence construction during the pendency of the application for rehearing of Resolution 4243-E, and its having done so does not warrant dismissal of this application.

7. The issue of the Commission's compliance with the PRA is beyond the scope of this proceeding.

8. The issue of whether the Commission improperly voted on Resolution 4243-E is beyond the scope of this proceeding.

9. SCE should be granted a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project with the mitigation identified in the MMRCP, which is attached to this decision.

10. This decision should be effective today.

11. Application 13-10-021 should be closed.

O R D E R

IT IS ORDERED that:

1. The Environmental Impact Report for the Moorpark-Newbury 66 kV Subtransmission Line Project is certified as having been completed in compliance with the California Environmental Quality Act, reviewed and considered by the California Public Utilities Commission (Commission) prior to approving the project, and reflective of the Commission's independent judgment and analysis.

2. Southern California Edison Company is granted a permit to construct the Moorpark-Newbury 66 kV Subtransmission Line Project, with the mitigation identified in the Mitigation Monitoring, Compliance and Reporting Plan, which is attached to this decision.

3. Energy Division may approve requests by Southern California Edison (SCE) for minor project refinements that may be necessary due to final engineering of the Moorpark-Newbury 66 kV Subtransmission Line Project

so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the environmental document; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement. SCE shall seek any other project refinements by a petition to modify this decision.

4. Within 90 days of this order, Southern California Edison shall submit, and serve on the official service list in Application 13-10-021, an advice letter analyzing the effectiveness and feasibility of reducing electromagnetic effects at low- or no-cost by affixing insulators and conductor mounts for the Moorpark-Newbury 66 kV Subtransmission Line Project on the west side of the tubular steel poles rather than on the east side closer to homes and, if effective and feasible, amending the Field Management Plan for the project to incorporate the measure.

5. Application 13-10-021 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

Mitigation Monitoring, Reporting, and Compliance Program

Southern California Edison's
Moorpark-Newbury 66 kV
Subtransmission Line Project

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM

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

INTRODUCTION

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

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

California Public Utilities Commission – MMRCP Authority

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

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

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

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

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

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

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

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

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

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

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

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

- Air Quality
- Noise

Roles and Responsibilities

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

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

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

Enforcement and Responsibility

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

Mitigation Compliance Responsibility

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

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

Dispute Resolution Process

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

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

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

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

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

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

General Monitoring Procedures

Mitigation Monitor

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

Construction Personnel

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

- SCE shall require all contractors to comply with the conditions of project approval, including all applicable APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all APMs mitigation measures requiring their attention.

General Reporting Procedures

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

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

Public Access to Records

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

Condition Effectiveness Review

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

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

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

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

Mitigation Monitoring, Reporting and Compliance Program

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[9] *Op cit.* 6

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(END OF SERVICE LIST)