

1.0 Introduction

Southern California Edison Company (SCE or the applicant) filed an application (A. 12-10-018) with the California Public Utilities Commission (CPUC) for a Permit to Construct (PTC) the Santa Barbara County Reliability Project (the proposed project) on October 26, 2012. The proposed project would include removal and/or replacement of existing 66-kilovolt (kV) subtransmission structures facilities, modifications to existing substations, installation of telecommunications facilities, and removal of subtransmission infrastructure decommissioned during past work activities between 1999 and 2004 (described further in Section 1.3, below). New construction and modifications to existing systems would occur in the cities of Buena Ventura (Ventura) and Carpinteria, and adjacent areas of unincorporated southern Santa Barbara County and northern Ventura County (Figure 1-1).

The application and Proponent's Environmental Assessment (PEA) were deemed complete on March 4, 2013.

1.1 Purpose and Need

1.1.1 Purpose

SCE states that the purpose of the proposed project is to ensure the availability of safe and reliable electrical service and to help meet customer electrical demand within the Electrical Needs Area (ENA) during emergency conditions. The ENA is defined by the geographic area that includes those customers served by the Goleta Substation (Figure 1-1).

1.1.2 Need

According to SCE the project is needed to improve reliability and address electrical demand under emergency conditions while also maintaining operational flexibility in the ENA. The ENA is isolated to the south and west by the Pacific Ocean, to the north by the Pacific Gas and Electric Company (PG&E) service boundary, and to the east by Los Padres National Forest. The ENA receives its electric service through SCE's existing Goleta 220/66 kV System. Due to the unique geographical features of the area, the Goleta 220/66 kV System is served via the Goleta-Santa Clara No. 1 220 kV Transmission Line and Goleta-Santa Clara No. 2 220 kV Transmission Line, which are located in a single right-of-way (ROW) on the same double circuit structures. An outage of both the Goleta-Santa Clara 220 kV transmission lines would result in an outage to metered customers and would require the ENA to be served from the three existing 66 kV subtransmission tie-lines that extend from the Santa Clara 220/66 kV Substation in Ventura County to the Carpinteria 66/16 kV Substation and Santa Barbara 66/16 kV Substation in the ENA¹. The 2014 projected peak demand for the ENA served by Goleta Substation is 269 Megavolt Amperes (MVA). The existing back-up 66 kV facilities would not have adequate capacity to serve the entire load if needed during emergency conditions. The three existing back-up 66 kV subtransmission tie lines collectively have a maximum operating limit of 124 MVA under normal operating conditions. Two of these 66 kV subtransmission lines also serve load in the Santa Clara System, which reduces their capacity to

¹ These three 66-kV subtransmission tie-lines do not serve load in the ENA under normal operating conditions.

1 serve the ENA if needed. As a result, for prolonged outages, only 100 MVA of load in the ENA can be
2 supported from these 66 kV lines in an emergency situation².

3
4 Accordingly, SCE projects that 165 MVA of peak load would be dropped and rotating outages would
5 occur in the ENA under such conditions. In order to minimize the potential for prolonged customer
6 outages, SCE determined in 1998 that reconductoring to increase the capacity of two of the three
7 existing 66 kV subtransmission tie-lines that connect the Santa Clara 66 kV Subtransmission System
8 and Goleta 66 kV Subtransmission System would address the existing limitation in redundant
9 service for the ENA³.

10
11 Based on the forecasted 2014 peak load and considering existing operating procedures, this
12 reconductoring and capacity increase of the 66 kV subtransmission lines would increase the
13 electrical power delivered to the ENA by 80 MVA (from 100 MVA to 180 MVA) during a prolonged
14 outage of both 220 kV transmission lines. This system work would enable SCE to serve a majority of
15 the load in the ENA and decrease the amount of load that otherwise would be dropped.

16 17 **1.2 Objectives**

18 19 **1.2.1 CPUC Objectives**

20
21 The CPUC developed the following three objectives of the proposed project with consideration of
22 the objectives presented in the PEA. The objectives, as defined by the CPUC, were used as a basis for
23 the development of a reasonable range of alternatives pursuant to CEQA (Chapter 3, "Description of
24 Alternatives").

25
26 The basic objectives of the proposed project are to:

- 27
28 1. Provide long-term reliability and continuity of service to the Electrical Needs Area.
- 29
30 2. Enhance operational flexibility by providing the ability to transfer the electric load between
31 local substations and remove existing 220-kV or 66-kV lines from service when needed for
32 maintenance purposes.
- 33
34 3. Increase energy efficiency of the 66-kV subtransmission line.

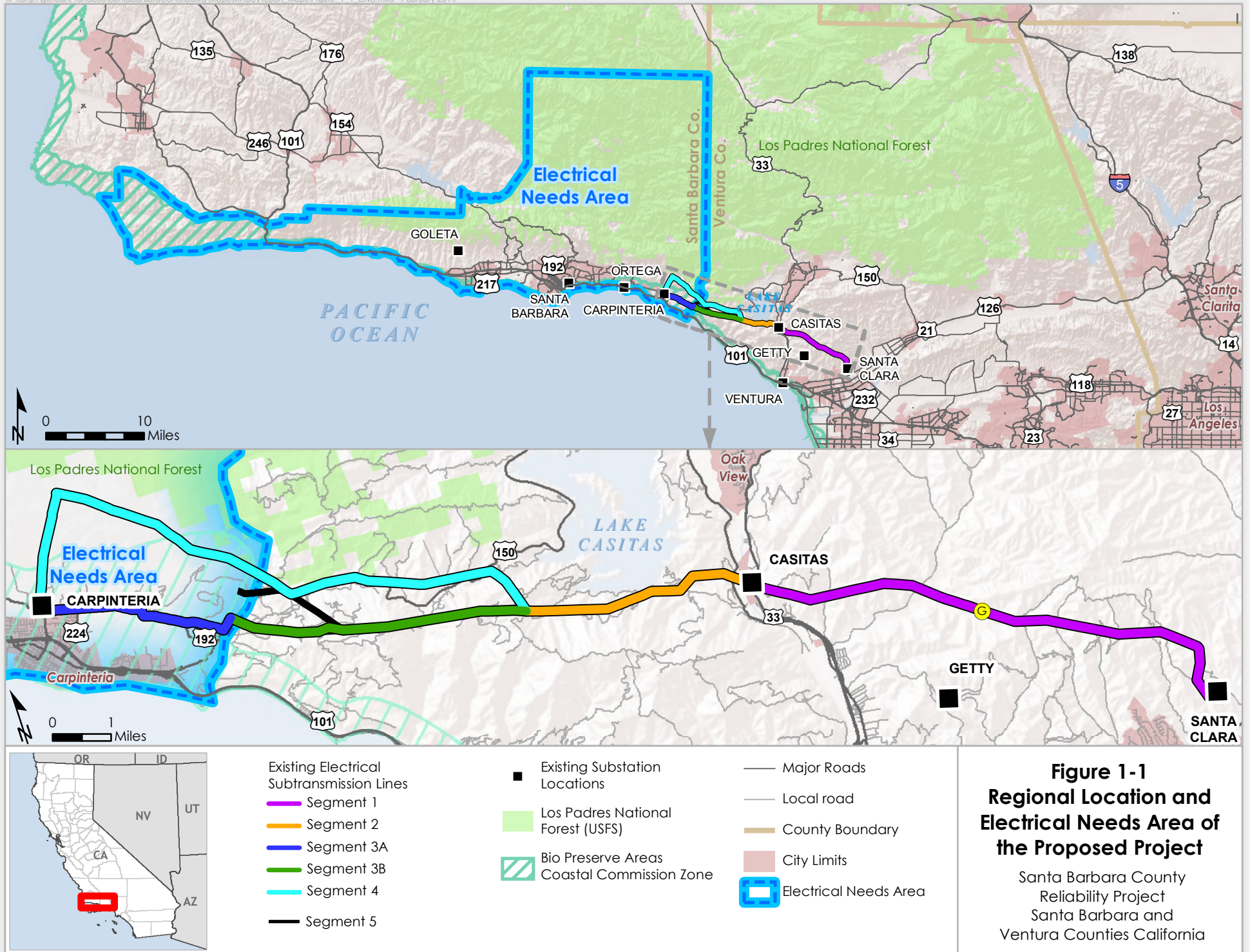
35 36 **1.2.2 Applicant's Stated Objectives**

37
38 The applicant identified the following objectives of the proposed project in the PEA. The analysis
39 presented in this EIR, however, only applies the three objectives defined by the CPUC (Section
40 1.2.1).

- 41
42 • Provide long-term reliability and continuity of service to the ENA in the event of a natural
disaster or other occurrence that affects the 220-kV transmission system serving the area.

² During a CAISO declared emergency, a third-party owned gas-fired generator could be dispatched by the CAISO to serve additional load in the ENA.

³ The third 66-kV line does not require reconductoring because it already has sufficient, higher capacity.



**Figure 1-1
Regional Location and
Electrical Needs Area of
the Proposed Project**

Santa Barbara County
Reliability Project
Santa Barbara and
Ventura Counties California

- 1 • Enhance operational flexibility by providing the ability to transfer the electric load between
2 local substations and remove existing 220-kV or 66-kV lines from service when needed for
3 maintenance purposes.
- 4 • To the extent practicable, use existing ROWs and facilities constructed to date to minimize:
5 - Environmental impacts
6 - Construction schedule, and
7 - Project cost and impact on ratepayers.
- 8 • Design and construct the Project in conformance with SCE’s current engineering, design,
9 and construction standards for substation, transmission, subtransmission, and distribution
10 system projects (SCE 2012).

12 **1.2.3 Applicability of Transmission Planning Standards to the Proposed Project**

13
14 The components of the project are not subject to North American Electric Reliability Corporation
15 (NERC) or Western Electricity Coordinating Council (WECC) planning standards because they are
16 not managed by the California ISO or deemed part of the region’s bulk electric grid. Therefore, the
17 components are subject only to the applicant’s *Transmission Planning Criteria and Guidelines*, which
18 are based on the NERC and WECC planning standards.

19 20 **1.3 Past Work Activities in the Project Area**

21 In 1999, SCE commenced construction in the project area on Segments 1, 2, and 3A and several
22 surrounding substations (Figure 1-1) without notifying or obtaining permits from either the CPUC
23 or the County of Santa Barbara, which implements the California Coastal Act. At the time, SCE
24 believed that the proposed upgrades to subtransmission lines in the Ventura and Santa Barbara
25 County area were exempt from permitting pursuant to CPUC General Order (GO) 131-D and the
26 California Coastal Act (California Public Resources Code section 30610) because they were
27 considered “equivalent facilities or structures.”

28
29 However, in 2004, residents of the Shepard Mesa area near Carpinteria raised concerns that the
30 new structures in Segment 3A were different in appearance from the previous structures. The
31 California Coastal Commission and County of Santa Barbara Coastal Program issued a Stop Work
32 order to SCE after staff determined that work within the Coastal Zone did not qualify for an
33 Exemption from a Coastal Development Permit (CDP) and that a California Environmental Quality
34 Act (CEQA) review was required. The County of Santa Barbara then contacted the CPUC in order to
35 determine whether SCE needed to obtain authorization from the CPUC in order to construct its
36 project. Upon reviewing the facts, the CPUC staff determined that SCE’s project did not qualify for
37 an exemption from G.O. 131-D and thus SCE had to file a PTC. SCE subsequently filed a PTC,
38 resulting in the promulgation of this document.

39
40 A description of the unpermitted work that occurred along Segments 1, 2, and 3A and several
41 surrounding substations that was completed without a CDP or PTC is provided in Chapter 6,
42 “Cumulative Impacts and Other CEQA Considerations.” For reasons provided in Section 1.4.2, below,
43 the past work along Segment 3A is also described in Chapter 7, “Environmental Impacts of the Past
44 Work Along Segment 3A”.

1 **1.4 Intended Uses of the EIR**

2 **1.4.1 CPUC Permit to Construct**

3
4 Pursuant to Article XII of the Constitution of the State of California, the CPUC is charged with the
5 regulation of investor-owned public utilities. The CPUC conducts two parallel processes when
6 considering any application for approval of a PTC: an application process similar to a court
7 proceeding, in which the CPUC considers whether the expansion is needed and is in the public
8 interest; and an environmental review process under the CEQA. Through this process, the CPUC
9 determines whether a project meets the criteria for approval. An Assigned Commissioner (one of
10 the CPUC's five appointed commission members) and an Administrative Law Judge supervise the
11 process. The CPUC is the lead agency for CEQA compliance in evaluation of the proposed project,
12 and has directed the preparation of this EIR.

13
14 This EIR provides an assessment of environmental impacts associated with the proposed project
15 and alternatives based on the level of design performed to date for each project element. Project
16 elements that would be implemented by SCE are based on preliminary engineering data and are
17 subject to change based on final engineering. Per CEQA Guidelines Section 15004, design of the
18 proposed project and the CEQA review process occur concurrently, not consecutively. These
19 concurrent processes allow the applicant to incorporate environmental considerations into project
20 conceptualization, design, and planning at the earliest feasible time. Additional environmental
21 analysis may be required in instances where, as a result of refined engineering design, anticipated
22 construction activities vary significantly from those described in the EIR.

23
24 As lead agency, the CPUC must determine through the CEQA process whether the proposed project
25 would result in significant impacts to the environment, and whether those impacts could be
26 avoided, eliminated, compensated for, or reduced to less than significant levels. This EIR will be
27 used by the CPUC in conjunction with other information developed in the CPUC's formal record to
28 act on the application for construction and operation of the proposed project. Under CEQA
29 requirements, the CPUC will determine the adequacy of the final EIR and, if adequate, will certify
30 the document as complying with CEQA. If the CPUC approves a project with significant
31 environmental impacts that cannot be mitigated to less than significant levels, it must state why in a
32 Statement of Overriding Considerations, which would be included in the Commission's decision on
33 the application.

34
35 **1.4.2 County of Santa Barbara Coastal Development Permit**

36
37 Segment 3A and a portion of Segment 4 are located within the California Coastal Zone. The portions
38 of the California Coastal Zone within Santa Barbara County are governed by the County of Santa
39 Barbara's Coastal Land Use Plan (certified by the California Coastal Commission in 1981) and
40 Chapter 35 of the County's Zoning Ordinance (certified by the California Coastal Commission in
41 2013). Development in the Coastal Zone requires the County's discretionary approval of a Coastal
42 Development Permit. Therefore, the County is a Responsible Agency under CEQA and will use this
43 EIR to satisfy its CEQA requirements for the CDP.

44
45 Prior to any development in the Coastal Zone of the County related to the proposed project, the
46 County must issue a CDP. The CDP would apply to both the proposed project and the past activities

1 in the Coastal Zone between 1999 and 2004, which were completed without a CDP. To facilitate the
2 County’s review of the CDP application, this EIR includes analysis of these past activities⁴.

3
4 Chapter 7 of the EIR analyzes the nature and extent of the environmental impacts that resulted
5 from the past work within the Coastal Zone (Segment 3A) to identify any long-term significant
6 impacts, e.g., visual impacts. The analysis compares current environmental conditions in Segment
7 3A to the physical conditions as they existed at the time the unpermitted work commenced, as data
8 can support. Chapter 7 also provides a brief, qualitative analysis of short-term impacts of the past
9 unpermitted activities, e.g., air quality and noise impacts, but does not attempt to identify or
10 quantify the significance of such impacts due to the difficulty of obtaining relevant data
11 retroactively and the inability to address such impacts through the County’s CDP process. The
12 analysis is based on information that was compiled from the PEA, the applicant’s responses to data
13 requests, previous field investigations conducted by the applicant, and estimates based on available
14 GIS data. Given the elapsed time between previous activities and the present proposed project, a
15 good faith effort was made to gather a reasonable level of data to characterize impacts; however,
16 environmental conditions prior when the past work along Segment 3A for many resource areas are
17 unknown or would be unreasonably onerous to identify.

18
19 This analysis also includes project options that would modify the design of the proposed project
20 along Segment 3A in order to reduce long-term significant impacts. Similar to alternatives to the
21 proposed project discussed in Chapter 3, project options were identified and screened in the
22 Screening Report (Appendix H) using the same CEQA screening criteria to determine whether the
23 option would reduce a significant long-term impact, meet most of the objectives of the proposed
24 project, and be potentially feasible. The term “option” is used to differentiate them from the
25 alternatives of the proposed project as they are not required under the CEQA Guidelines (Section
26 15126.6(a)).

27 28 **1.4.3 Other Public Agencies**

29
30 In addition to the CPUC and the County of Santa Barbara, other state, regional, and local agencies—
31 such as the Department of Transportation, Department of Fish and Wildlife, Air Quality
32 Management District, Regional Water Quality Control Board, and Historic Preservation Office—may
33 be involved in reviewing and/or approving the proposed project. At the federal level, agencies with
34 potential reviewing and/or permitting authority include the U.S. Army Corps of Engineers (USACE),
35 U.S. Fish and Wildlife Service (USFWS), U.S. Forest Service (USFS), and U.S. Bureau of Reclamation
36 (BOR). The USACE and USFWS will rely on the information presented in this EIR to inform their
37 decision regarding the issuance of permits related to construction or operation of the proposed
38 project. The USFS is reviewing the project in a separate NEPA process, and the terms of the existing
39 BOR permit do not require amendment.

40
41 CPUC General Order 131-D, which establishes requirements for the planning and construction of
42 facilities for the generation and transmission of electricity, requires the applicant to comply with
43 local building, design, and safety standards to the greatest degree feasible to minimize project

⁴ Although CEQA does not require review of prior unpermitted activity (*Fat v. County of Sacramento* [2002] 97 Cal.App.4th 1270; *Riverwatch v. County of San Diego* [1999] 76 Cal.App.4th 1428), this assessment is provided to support the County’s CDP process and to provide the public with an opportunity to review and comment on project options that might reduce any of the unpermitted work’s long-term, significant impacts.

1 conflicts with local conditions. The applicant would still be required to obtain all building,
2 encroachment, and other ministerial (administrative) permits from local jurisdictions.

3
4 General Order 131-D also requires the CPUC to contact and coordinate with local planning agencies
5 regarding land use concerns that could result from the proposed project. The CPUC consulted with
6 other affected agencies and jurisdictions to gather information related to the possible
7 environmental effects of the proposed project: this included making early contact and opening a
8 line of communication with key public agencies that would be directly affected by the proposed
9 project, and, as part of this process, obtaining insight and information for this EIR. Public agency
10 representatives provided background information on the local setting, permitting requirements,
11 regulatory requirements, land use information, and local environmental concerns. Chapter 8, "List
12 of Preparers, Agencies, and Persons Contacted," lists all agencies consulted during preparation of
13 this EIR.

14 **1.5 CEQA Process**

15 **1.5.1 Public Scoping**

16
17
18 On April 13, 2013, the CPUC published and distributed a Notice of Preparation (NOP) in accordance
19 with the CEQA Guidelines. The NOP was distributed to the State Clearinghouse, responsible and
20 trustee agencies, including 69 representatives of federal, state, regional, and local agencies,
21 planning groups. The NOP was also sent to members of six tribes. Additionally, the NOP was
22 distributed to over 380 individuals, including property owners within 300 feet of the existing and
23 proposed project ROW and substations.

24
25 The NOP solicited written and verbal comments on the EIR's scope during a 30-day comment
26 period and provided information about the public scoping meeting. It also presented a description,
27 the purpose, and the location of the proposed project, potential issues to be addressed in the EIR,
28 and contact details for additional information. In addition to the NOP, the CPUC placed notices
29 announcing the public scoping meeting in the following newspapers: the *Santa Barbara News Press*
30 and *Ventura County Star* on April 23, 2013 and the *Carpinteria Coastal View* on April 25, 2013.

31
32 The CPUC conducted a scoping meeting on May 7, 2013, at the Carpinteria City Hall in Carpinteria,
33 California, to solicit verbal comments on the scope of the EIR. During the public scoping meeting,
34 participants commented on the scope of issues to be included in the EIR for the proposed project.
35 An additional tribal meeting was held on May 6, 2013, at the Carpinteria Branch Library, in
36 Carpinteria, California, to discuss potential impacts of the proposed project on cultural resources.
37 Written comments were also collected throughout the public comment period.

38
39 The CPUC received five written comment letters from government agencies, one comment letter
40 from a tribal member, and 10 comment letters from members of the public and a private
41 organization. Four verbal comments were received from members of the public and a private
42 organization. A Public Scoping Report is provided in Appendix A.

43 **1.5.2 Screening of Alternatives to the Proposed Project**

44
45
46 Alternatives to the proposed project were presented by the applicant in the PEA, developed by the
47 CPUC, and suggested by the public during scoping. An alternatives screening process was carried
48 out to determine which alternatives could feasibly accomplish the purpose of the proposed project
49 (Section 1.1) and attain most of its basic objectives (Section 1.2) but would avoid or substantially

1 lessen significant effects pursuant to CEQA Guidelines Section 15126.6. The outcome of the
2 screening process was a reasonable range of alternatives to be evaluated in the EIR. The
3 alternatives eliminated from further consideration and those retained for analysis in this EIR are
4 presented in Chapter 3, "Description of Alternatives," and compared in Chapter 5, "Comparison of
5 Alternatives."

6
7 Pursuant to CEQA, a No Project Alternative was carried through both the alternatives screening
8 process and the description and comparison of alternatives in this EIR. The Environmentally
9 Superior Alternative is defined in Chapter 5, "Comparison of Alternatives," based on a comparison
10 of each alternative with the proposed project as required by CEQA.

11 12 **1.5.3 Public Comment on the Draft EIR**

13
14 The Draft EIR is circulated to local and state agencies and interested individuals who may wish to
15 review and comment on the report. Written comments may be submitted to the CPUC during the
16 45-day public review period for the Draft EIR. Written comments on the Draft EIR will be accepted
17 via regular mail, fax, and e-mail. Verbal and written comments will be accepted at a public meeting
18 to be noticed under separate cover.

19
20 Written and oral comments on the Draft EIR will be addressed in a Response to Comments
21 document that, together with the Draft EIR, will constitute the Final EIR. The Final EIR will be
22 released for public review before the CPUC decides whether to certify the Final EIR. The CPUC will
23 then issue a proposed decision on the application and release it for public comment. The CPUC
24 proposed decision can be found here:
25 <http://docs.cpuc.ca.gov/SearchRes.aspx?ProposedDecisions=1&DaySearch=30>.

26 27 **1.6 Organization of the EIR**

28
29 This EIR is organized as follows:

30
31 **Executive Summary.** Presents a summary of the environmental impacts of the proposed project
32 and mitigation measures identified to reduce or eliminate significant impacts. The Executive
33 Summary also presents a summary of alternatives to the proposed project.

34
35 **Chapter 1: Introduction.** Provides a discussion of the background and objectives of the proposed
36 project. The results of the public scoping process are summarized, and public agency and other
37 planned uses of the EIR are explained.

38
39 **Chapter 2: Project Description.** Provides a detailed description of the proposed project and a
40 summary of permits and consultations that may be required.

41
42 **Chapter 3: Description of Alternatives.** Provides a description of the alternatives evaluation
43 process and or the alternatives considered in this EIR.

44
45 **Chapter 4: Environmental Analysis.** Provides a comprehensive analysis and assessment of
46 impacts and mitigation measures for the proposed project. This chapter is divided into sections for
47 each environmental issue area (e.g., Aesthetics, Agriculture and Forestry Resources, and Air
48 Quality).

1 **Chapter 5: Comparison of Alternatives.** Provides a discussion of the relative advantages and
2 disadvantages of the proposed project and alternatives and identifies the CEQA Environmentally
3 Superior Alternative.

4
5 **Chapter 6: Cumulative and Other CEQA Consideration.** Identifies and evaluates past, present,
6 and reasonably foreseeable future projects within the cumulative study area that may be
7 constructed or commence operation during the timeframe of activity associated with the proposed
8 project. The chapter also provides an assessment of cumulative impacts of the proposed project and
9 mitigation measures. The purpose of the cumulative impacts analysis is to identify impacts from the
10 proposed project that might not be significant when considered alone but may contribute to
11 significant impacts when considered in conjunction with impacts from past, current, and
12 reasonably foreseeable future projects. Provides a discussion of growth-inducing impacts,
13 significant irreversible environmental changes, and significant and unavoidable environment
14 effects.

15
16 **Chapter 7: Environmental Impacts of the Past Work Along Segment 3A.** Provides a limited
17 analysis of impacts for the past work along Segment 3A. Identifies alternatives to address long-term
18 significant impacts of the past work along Segment 3A.

19
20 **Chapter 8: List of Preparers, Agencies, and Persons Contacted.** Identifies the primary authors of
21 this EIR and a list of agencies and persons consulted during the preparation of this report.

22
23 **Chapter 9: Mitigation Monitoring Plan.** Provides a discussion of CPUC mitigation monitoring
24 requirements and summary of impacts of the proposed project and measures that would be
25 implemented to avoid or reduce those impacts.

26
27 **Chapter 10: References.** Provides a list of reference use throughout the document and organized
28 by section.

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