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CEQA Guidelines (Section 15126.6(a)) require that an environmental impact report:

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

The selection of the alternatives is presented in Section 15126.6(c), which notes that

“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.”

Section 15.126.6(c) also notes that alternatives may be eliminated from detailed consideration in an environmental impact report for one of three reasons: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The basic Project Objectives, as presented in Section 1.4, are as follows:

- Meet long-term projected electrical load requirements with additional transformer capacity and a substation that is capable of future expansion.
- Provide safe and reliable electrical service consistent with SCE’s criteria and guidelines.
- Meet project needs while minimizing environmental impacts.
- Restore capacity reserve and operational flexibility of the existing 33 kV distribution network.

As set forth in Chapter 2, SCE developed four potential System Alternatives for preliminary consideration. The technical aspects of these System Alternatives and the benefits they present are contained in Chapter 2.

System Alternative 1, No Project, does not meet the basic Project Objectives and was therefore eliminated from further consideration. System Alternatives 2 and 3 do not meet the basic Project Objectives, and were therefore eliminated from further consideration. System Alternative 4 meets the basic Project Objectives and is feasible; therefore, it was retained as the Proposed Project.

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In addition, no alternative locations are discussed further in this PEA because no alternative locations could reasonably be expected to allow for the expansion of Downs Substation as feasibly as the proposed location while also reducing environmental impacts. For example, the existing Downs Substation is already in operation at the current location, so development of an expanded Downs Substation at another location would require additional work associated with the transfer of existing equipment from the current location to the new location. That additional work would necessarily cause additional environmental impacts, including impacts associated with additional truck trips (such as traffic congestion and air emissions) that would not be associated with the Proposed Project if constructed at the current Project Area/SCE-owned property.

Similarly, the current Downs Substation is located immediately adjacent to the existing Inyokern-McGen-Searles No. 2 115 kV subtransmission line, so looping that line into the proposed expanded Downs Substation would require construction of only approximately 1,000 circuit feet of new lines. In contrast, if the Proposed Project were to be constructed at another location, looping in a 115 kV subtransmission line could require potentially longer circuits if the new location is not immediately adjacent to an existing 115 kV subtransmission line. The construction of longer circuits would also consequently produce increased environmental impacts compared to the current location.

In addition, because SCE already owns the entirety of the property on which the expanded Downs Substation would be constructed, construction of the Proposed Project at the Project Area/SCE-owned property would be more feasible from an economic perspective than would construction of the Proposed Project at an alternative location. For example, acquisition of a new location large enough to house the expanded Downs Substation could require a substantial capital outlay and a potential condemnation action, all while rendering the already-developed portions of the Project Area/SCE-owned property needlessly obsolete. In contrast, because SCE already owns the entire location on which the current Proposed Project would be constructed, the Proposed Project would be more feasible at the current location. For these reasons, no alternative locations for the Proposed Project are further considered in this PEA.