

6. Other CEQA Considerations

6. Other CEQA Considerations

This section addresses issues required to be addressed by CEQA that are beyond the impact analysis presented in Chapter 4. Such issues include cumulative impacts, growth-inducing impacts, and mandatory findings of significance.

6.1 Cumulative Impacts

CEQA requires lead agencies to consider the cumulative impacts of proposals under their review. Section 15355 of the CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” A cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts” (Section 15130(a)(1)). The cumulative impacts analysis “would examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects” (Section 15130(b)(3)).

Section 15064(h)(3) states that a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located.

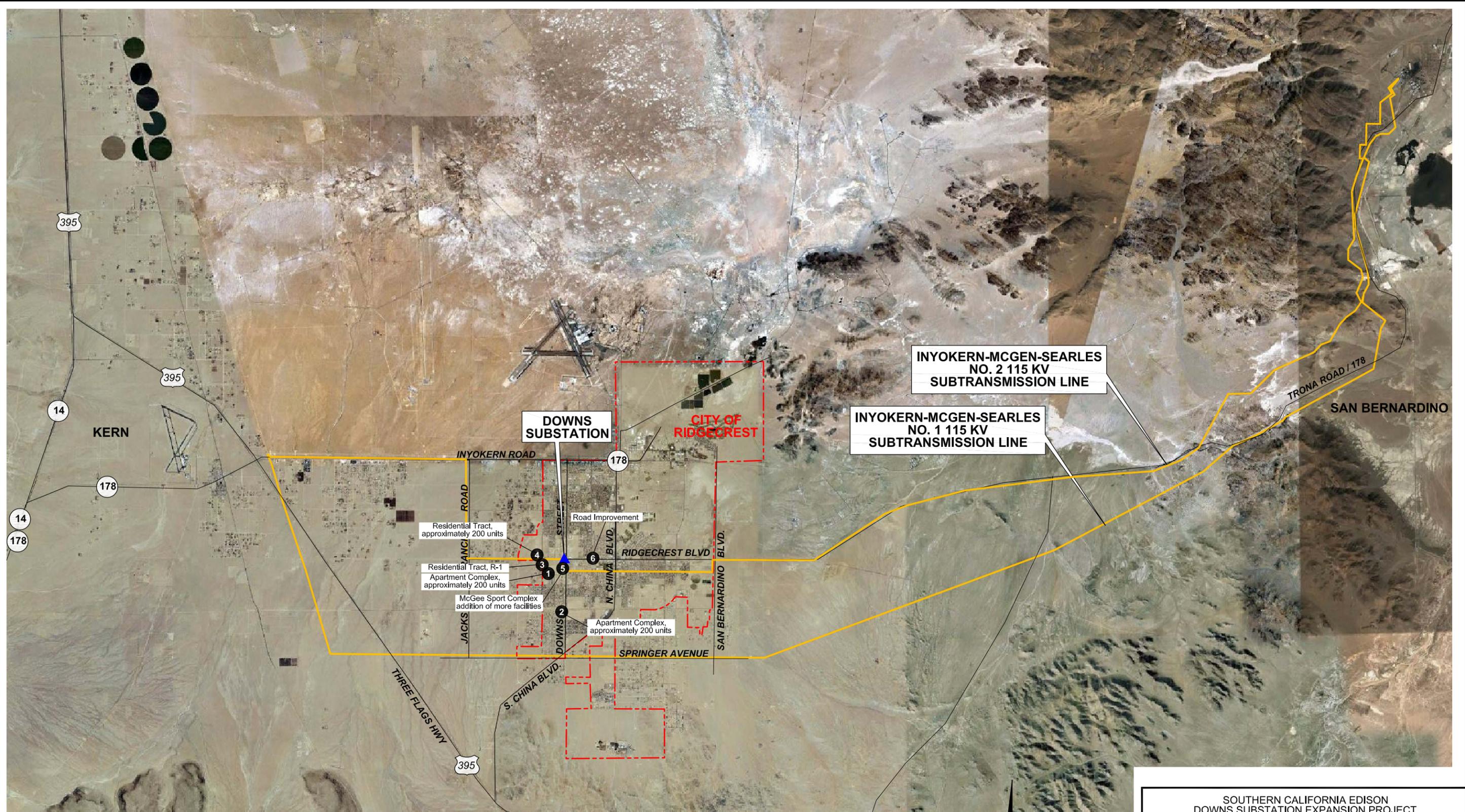
In conducting a cumulative impacts analysis, impacts are referenced to the temporal span and spatial areas in which the Proposed Project would cause impacts. Additionally, a discussion of cumulative impacts must include either: (1) a list of past, present, and probable future projects, including, if necessary, those outside the lead agency’s control; or (2) a summary of projections contained in an adopted general plan or related planning document, or in a prior certified EIR, which described or evaluated regional or area-wide conditions contributing to the cumulative impact, provided that such documents are referenced and made available for public inspection at a specified location (Section 15130(b)(1)). As used in this section, “probable future project” includes approved projects that have not yet been constructed; projects that are currently under construction; projects requiring an agency approval for an application that has been received at the time a Notice of Preparation is released; and projects that have been budgeted, planned, or included as a later phase of a previously approved project.

The cumulative impact analysis for the Proposed Project included a review of developments within approximately one mile of the proposed Downs Substation expansion location and within one mile

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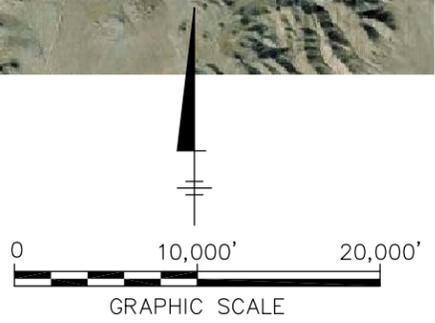
of the Inyokern-McGen-Searles No. 1 and No. 2 115 kV subtransmission lines. This one-mile boundary was chosen to identify those future projects whose impacts could potentially intersect with, or overlap, those of SCE's Proposed Project, and thus where a cumulatively considerable impact could result. Probable future projects were identified by contacting the City of Ridgecrest's Planning Department and the Kern County Planning Department. Information from the San Bernardino County Land Use Services Department was requested but not provided. These identified projects are shown on [Figure 6.1-1](#) and listed in [Table 6.1-1](#). In the discussion below, future projects evaluated are referred to as Probable Future Projects.

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LEGEND:

-  SUBSTATION
-  CITY OF RIDGECREST
-  SUBTRANSMISSION/TELECOM LINE LOOP



SOUTHERN CALIFORNIA EDISON
 DOWNS SUBSTATION EXPANSION PROJECT
 KERN AND SAN BERNARDINO COUNTIES, CALIFORNIA
PROPONENT'S ENVIRONMENTAL ASSESSMENT

LOCATION OF PROJECTS FOR THE CUMULATIVE IMPACT ANALYSIS



 FIGURE **6.1-1**
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Table 6.1-1 Probable Future Projects in the Vicinity of the Proposed Project

	Project Type	Location	Status
1	Apartment Complex, approximately 200 units	West of Inyo and Church, City of Ridgecrest	Proposed
2	Apartment Complex, approximately 200 units	Downs and Bowman, City of Ridgecrest	Application pending
3	Residential Tract, R-1	Mahan, just south of Ridgecrest Boulevard, City of Ridgecrest	Proposed
4	Residential Tract, approximately 200 units	Northwest corner of Mahan and Ridgecrest Boulevard, City of Ridgecrest	Approved
5	Addition of more facilities	Kerr-McGee Sport Complex, City of Ridgecrest	Pending
6	Road Improvement	Ridgecrest Boulevard, City of Ridgecrest	Pending

6.1.1 Significance Criteria

The CEQA Environmental Checklist provides significance criteria for assessing the cumulative impacts of the Proposed Project. A project causes a potentially significant cumulative impact if:

- The project has impacts that are individually limited, but cumulatively considerable, where “cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

6.1.2 Impact Assessment

The Proposed Project would have a less than significant impact for the following criterion:

Does the Proposed Project have impacts that are individually limited, but cumulatively considerable, where “cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?

Less than Significant Impacts. As presented in Chapter 4, several resource categories have no impact associated with them; because they present no impact, they therefore could not present or contribute to a cumulative impact. As a result, the following resource categories are excluded

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from the evaluation of this criterion: Agriculture and Forestry, Land Use, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities.

The following sections discuss the potential cumulative impacts of the remaining environmental resource categories.

Aesthetics

As discussed in Section 4.1, the Proposed Project would represent a minor incremental change in the visual character of the area. Vertical, man-made features already exist in the area and are part of the visual landscape. Specifically, the immediate area already includes the existing Downs Substation, poles, conductors, and lines. The expanded area of Downs Substation would be adjacent to the existing substation, and the new TSPs and LWS poles would be of a similar character to, although slightly higher than, the existing poles in the area. Additionally, the entirety of the routes where the proposed fiber optic telecommunication cable would be installed and where the six subtransmission poles would be replaced is characterized by existing transmission lines. Finally, the proposed Downs Substation expansion would include landscaping, developed in consultation with the City of Ridgecrest, to filter views for the surrounding community.

None of the Probable Future Projects identified in [Table 6.1-1](#) would be immediately adjacent to the proposed Downs Substation expansion, and thus new infrastructure at the proposed expansion location would not combine with any of the Probable Future Projects to impact the viewshed around the proposed expansion location. The fiber optic telecommunication cable would be installed on existing infrastructure in the immediate vicinity of some of the Probable Future Projects. However, because of the small diameter of the cable and its placement on existing infrastructure, the fiber optic telecommunication cable would not combine with any of the Probable Future Projects to significantly impact the viewsheds along the existing 115 kV subtransmission lines.

Thus, although the Proposed Project would result in a slight incremental change to the visual landscape, the impacts of the Proposed Project on aesthetics would be less than significant and are not cumulatively considerable when viewed in combination with the Probable Future Projects evaluated in this section.

Air Quality

As discussed in Section 4.2, construction and operation of the Proposed Project would result in less than significant impacts to all air quality-related CEQA criteria. Specifically, the Proposed Project would emit criteria pollutants below the threshold levels established in plans adopted by

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the EKCAPCD and the MDAQMD to achieve attainment with state and federal air quality standards. Consistent with CEQA Guidelines section 15064(h)(3), because the Proposed Project would comply with applicable air quality plans and would not impede either District from achieving attainment, the Proposed Project would not have a significant cumulative impact.

Biological Resources

As discussed in Section 4.4, the construction and operation of infrastructure at the proposed Downs Substation expansion would have a less than significant impact to biological resources with the implementation of APMs. To the extent that burrowing owls are encountered during construction, APMs 3 and 5 would ensure that any potential impacts would be addressed. When considered together with the Probable Future Projects, the Proposed Project would not be expected to materially reduce the amount of available habitat in the area. Therefore, the Proposed Project would not have a cumulatively considerable impact in the vicinity of the proposed Downs Substation expansion.

Installation of the six replacement subtransmission poles and installation and operation of the fiber optic telecommunication cable would have a less than significant impact on biological resources with the implementation of APMs. The potential impacts to Mohave ground squirrel, desert tortoises, and nesting birds from work along the 115 kV subtransmission line corridors are location- and species-specific. To the extent that the Proposed Project would have any impact to biological resources, it would be of limited duration and the majority of the activities would occur at a substantial distance from all Probable Future Projects.

Additionally, the Proposed Project would have less than significant impacts on drainage features. All potential drainage impacts would occur in areas remote from the Probable Future Projects. Therefore, when considered with the Probable Future Projects, the Proposed Project would not have a cumulatively considerable impact.

Cultural Resources

As presented in Section 4.5, the Proposed Project would have less than significant impacts on cultural and paleontological resources with the implementation of APMs. Similar to the Proposed Project, the Probable Future Projects would be expected to undergo CEQA review and would be subject to applicable regulatory requirements to protect cultural and paleontological resources. Therefore, the Proposed Project would not have a significant cumulative impact on cultural or paleontological resources.

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Geology/Soils

The less than significant impacts discussed in Section 4.6 are largely a function of the specific geological conditions and soil types found at the location of the proposed Downs Substation expansion location and the ROWs where the proposed subtransmission poles would be replaced and where the fiber optic telecommunication cable would be installed. As a result, these impacts are inherently non-cumulative (activities at another location would not alter the geology of the area, or modify the soils at the Proposed Project location, for example). Those less than significant impacts that could result in impacts away from the location of the Proposed Project (landslides, failure of infrastructure due to placement across a fault line) are located in areas that are physically distant from the Probable Future Projects, and thus the impacts from the Proposed Project and Probable Future Projects could not be cumulative. The incremental effect of the Proposed Project on soil erosion, when combined with the potential impacts of Probable Future Projects, would not be cumulatively considerable due to the limited excavation and grading required for the Proposed Project. Therefore, the less than significant effects of the Proposed Project would not result in a cumulatively considerable impact.

Greenhouse Gases

As presented in Section 4.7, the construction and operation of the Proposed Project would result in less than significant impacts from GHG emissions.

At present, no formally adopted GHG emissions threshold applies to the Proposed Project. For this reason, even though the Proposed Project is not located within the boundaries of the South Coast Air Quality Management District (SCAQMD), SCAQMD's interim CEQA thresholds were used as a threshold for greenhouse gas emissions (as measured in CO₂e). The Proposed Project falls within the category termed "industrial projects." For such projects, SCAQMD has identified a threshold of 10,000 metric tons per year of CO₂e for cumulative impact analysis. Modeling for the Proposed Project indicates that the GHG emissions would not exceed 450 metric tons per year CO₂e and would therefore be well below the SCAQMD threshold for cumulative impacts.

The Proposed Project would also use sulfur hexafluoride (SF₆) in gas insulated switchgear (GIS) at the proposed Downs Substation expansion area. SF₆ is a potent GHG that has the potential to contribute to climate change. CARB adopted a Climate Change Scoping Plan in 2008. The Plan calls for development and implementation of measures to meet the general goals set forth in the Scoping Plan. While some measures have been formally adopted, others are still in development and are not currently effective. In February 2010, CARB adopted proposed regulations to address SF₆ emissions from GIS (the proposed regulations have not been finalized by CARB or submitted to the Office of Administrative Law [OAL] for approval). The proposed regulations would require

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owners of GIS to comply with maximum annual SF₆ emission rates. The maximum emission rate would initially be 10 percent in 2011, but would decrease by a percent each year until 2020, when the maximum annual SF₆ emission rate would be one percent. Although the proposed regulations have not been finalized and approved by OAL and are not yet effective, SCE has already initiated efforts to address SF₆ emissions from GIS. SCE has established Gas Management Guidelines that allow for rapid location and repair of equipment leaking SF₆ gas. These efforts have resulted in reductions of overall SF₆ emissions over time. SCE would apply its Gas Management Guidelines at the proposed Downs Substation expansion area. With implementation of SCE's existing SF₆ Gas Management Guidelines, SF₆ emissions from the Proposed Project would be expected to meet the proposed CARB regulatory requirements.

Because the Proposed Project would emit approximately 450 tons per year of GHGs, which is below the SCAQMD significance threshold, and because the Proposed Project is not out of compliance with the requirements of any state, regional, or local approved air quality or greenhouse gas plan, the Proposed Project's incremental contribution to climate change would not be cumulatively considerable.

Hazards and Hazardous Materials

As discussed in Section 4.8, the Proposed Project would have a less than significant impact on hazards and hazardous materials. The Proposed Project would require the transportation and use of hazardous materials typical of construction projects including gasoline, diesel fuel, oil, and lubricants. The Probable Future Projects would likely use similar hazardous materials. Federal and state regulations effectively reduce the potential impact from the Proposed Project that could result from the transportation and use of these materials to less than significant; such federal and state regulations would also apply to the Probable Future Projects. Therefore, the incremental effect from the Proposed Project, in combination with the incremental effect from the small number of Probable Future Projects identified, would not result in a cumulatively considerable impact.

None of the Probable Future Projects are located in the vicinity of either a public or private airstrip and a component of the Proposed Project. As a result, these impacts are inherently non-cumulative. Similarly, the physical distance between the proposed Downs Substation location expansion and the Probable Future Projects would not result in any cumulative impacts to implementation of emergency response plans or evacuation plans.

Hydrology/Water Quality

As presented in Section 4.9, the Proposed Project presents no impacts to several hydrology and water quality criteria (those related to flood hazards and inundation), and only incremental, less

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than significant impacts under other criteria (those related to water quality standards, groundwater, and the alteration of drainage patterns). Many of these potential incremental impacts are negligible (impacts to groundwater) or specific to the immediate vicinity of the proposed Downs Substation expansion location (potential to increase on- or off-site erosion, siltation, or flooding). Due to the distance between the Probable Future Projects and the proposed Downs Substation expansion location (where any effects may be realized), the incremental and less than significant effects that may result from the Proposed Project would not, in combination with effects generated by Probable Future Project, result in a cumulatively considerable impact.

Noise

As presented in Section 4.12, construction of the Proposed Project would result in less than significant noise- and vibration-related effects through adherence to County and City codes regarding construction hours and due to the distance to the nearest sensitive receptors (residential dwellings). Operation of the Proposed Project would generate only a minor incremental change in the ambient noise level in the vicinity of the proposed Downs Substation expansion location (less than 5 dBA).

The Probable Future Projects in the vicinity of the proposed Downs Substation expansion include residential developments and the addition of new athletic fields. It is assumed that the construction of any of these Probable Future Projects would also adhere to these codes. As a result, the Proposed Project's incremental effect combined with the effects from Probable Future Projects (if they were undertaken at the same time as the Proposed Project) would not create a significant cumulative effect.

Transportation/Traffic

As discussed in Section 4.16, construction and operation of the Proposed Project would result in no impacts to air traffic patterns and emergency access, and would not increase hazards due to a design feature; therefore, there would be no cumulative impact to these criteria as a function of the Proposed Project.

Construction of the Proposed Project would result in less than significant impacts to the level of service and congestion on roadways or to public transport, bicycle, or pedestrian travel. The timing of construction activities related to Probable Future Projects is unknown at this time; however, the Proposed Project's contribution to any significant effect would be rendered less than cumulatively considerable through the implementation of BMPs and appropriate traffic control as contained in permits from the City and Counties, and thus would not be significant.

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Operation of the Proposed Project would have a less than significant impact to the level of service and congestion on roadways or to public transport, bicycle, or pedestrian travel; therefore, there would be a less than significant cumulative impact to these criteria as a function of operation of the Proposed Project.

6.2 Growth-Inducing Impacts

6.2.1 Significance Criteria

Section 15126.2(d) of the CEQA Guidelines states that an environmental impact report shall "...discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment..."

A project could be considered to have growth inducing effects if it:

- Either directly or indirectly fosters economic or population growth or the construction of additional housing in the surrounding area;
- Removes obstacles to population growth;
- Requires the construction of new community facilities that could cause significant environmental effects; or
- Encourages and facilitates other activities that could significantly affect the environment, either individually or cumulatively.

6.2.2 Impact Assessment

The Proposed Project would have no impacts for the following CEQA criteria.

Would the Proposed Project either directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding area?

No Impact. The Proposed Project is designed to meet forecasted electrical demand and maintain safe and reliable service to customers in portions of the City of Ridgecrest and the surrounding areas of unincorporated Kern and San Bernardino Counties. The Proposed Project could be considered growth-inducing if growth resulted from the direct and indirect employment needed to

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construct, operate, and maintain the Proposed Project, and/or if growth resulted from the additional electrical power that would be transmitted by the Proposed Project. As discussed in Section 3, Project Description, the construction and operation of the Proposed Project would not affect employment in the area.

SCE would draw the labor required for construction from its current workforce or contractors. The limited, short-term nature of this employment would not result in long-term growth in the area. The local community has adequate infrastructure and services to meet the needs of temporary workers associated with the Proposed Project. During operations, SCE personnel would generally visit only for electrical switching and routine maintenance. No long-term employment would occur in association with the operational phase of the Proposed Project.

Construction and operation of the Proposed Project would not cause new opportunities for new industry or commerce or impact population growth in the area. Therefore, no impacts would occur under this criterion as a result of the Proposed Project.

Would the Proposed Project remove obstacles to population growth?

No Impact. The Proposed Project would increase capacity at the Downs Substation and would allow space for limited future modification; however, the Proposed Project would not remove obstacles to population growth. Local governments in California can increase and decrease the potential for community growth through the creation and/or implementation of policies that are specifically designed to promote or minimize growth. Jobs, developable land, and infrastructure are also needed to support existing and planned future populations. The Proposed Project would not remove obstacles to population growth. Therefore, no impacts would occur under this criterion as a result of the Proposed Project.

Would the Proposed Project require the construction of new community facilities that could cause significant environmental effects?

No Impact. The Proposed Project would not involve the creation of any community facilities or public roads that would provide new access to undeveloped or underdeveloped areas, or extend public service to an area presently not served by electricity. The Proposed Project is designed to respond to existing growth and demand trends and would not require the construction of new community facilities that could cause significant environmental effects. Therefore, no impacts would occur under this criterion as a result of the Proposed Project.

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Would the Proposed Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

No Impact. The Proposed Project would not encourage or facilitate other activities that could significantly affect the environment. The Proposed Project would ensure that SCE would be able to reliably meet current and future electrical subtransmission requirements in the area. No significant effects related to growth inducement would occur from the Proposed Project. Therefore, no impacts would occur under this criterion as a result of the Proposed Project.

6.3 Significant Environmental Effects

The CEQA Guidelines (Section 15126.2) requires a discussion of the overall significance of the environmental effects of the Proposed Project. This discussion is to distinguish between the direct and indirect effects of a project, and the short-term/long-term effects of a project. These potential significant environmental effects are summarized in [Table 6.3-1](#). With the implementation of APMs, all of the potential significant environmental effects associated with the Proposed Project would be reduced to less than significant levels.

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Table 6.3-1 Potential Significant Environmental Effects

Resource	Description	Direct/Indirect	Short-term/Long-term
Biological Resources			
Mohave ground squirrel	During replacement of subtransmission line poles, burrows could be impacted	Direct	Short-term. SCE's APMs 1, 2, 3, and 5 would be implemented to reduce impacts to less than significant
Desert tortoise	During fiber optic telecommunication cable installation, tortoise could be impacted by vehicle traffic	Direct	Short-term. SCE's APMs 1, 2, 3, and 5 would be implemented to reduce impacts to less than significant
Nesting birds	During installation of replacement subtransmission poles and installation of fiber optic telecommunication cable, nesting birds may avoid the area due to Proposed Project activities	Direct	Short-term. SCE's APMs 2, 3, and 5 would be implemented to reduce impacts to less than significant
Cultural Resources			
Archaeological resource pursuant to Section 15064.5	Construction of Downs Substation expansion will require ground disturbing activities, and thus the potential for uncovering buried resources exists	Direct	Short-term. SCE's APM CR-1 to reduce any potential impacts to less than significant

6.4 Mandatory Findings of Significance

The Mandatory Findings of Significance are as follows:

Does the Proposed Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major period of California history or prehistory?

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Less than Significant Impact. The Proposed Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major period of California history or prehistory. Therefore, less than significant impacts would occur under this criterion as a result of the Proposed Project.

Does the Proposed Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects.)

No Impact. As discussed in Section 6.1 above, the Proposed Project, with the implementation of APMs, would not result in any cumulatively considerable impacts to any environmental resource category. Therefore, no impacts would occur under this criterion as a result of the Proposed Project.

Does the Proposed Project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. Construction and operation of the Proposed Project would not cause substantial adverse effects on human beings, either directly or indirectly. As presented in Chapter 4 and above in Section 6.1, the direct and indirect impacts of the Proposed Project would be less than significant for all CEQA criteria during both the construction and operations phases of the Proposed Project. Consequently, the Proposed Project would not cause any substantial adverse direct or indirect effects on human beings.