

## **E. Other CEQA Considerations**

### **E.1 Environmental Effects Found not to be Significant**

Section 15128 of the CEQA Guidelines states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. These are the environmental effects found not to be significant based on the site or project characteristics.

#### **Minerals**

There are no locally important mineral resource recovery sites delineated in any local general plan, specific plan, or other land use plan governing the proposed Project area. The majority of Segment 1 of the proposed Project is located within the SMGB MRZ-4 classification zone. This designation is assigned to areas where insufficient information is available regarding the presence or absence of mineral deposits. Segment 2 of the proposed Project is within the SMGB MRZ-3a classification zone. This designation is assigned to areas where there is the potential for unknown mineral resources.

However, potential impacts associated with temporary construction activities for the proposed Project would affect a very small area in a narrow strip along the proposed Project. No active mining locations are in the vicinity of the proposed Project, and no mining of metallic or nonmetallic deposits are within 1,000 feet on either side of the proposed Project alignment. Construction activities associated with the proposed Project would not result in the loss of known mineral resources, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impact would occur.

Operation and maintenance (O&M) of the proposed Project would include routine inspection and maintenance of the Proposed 115 kV subtransmission line. No active mining locations are in the vicinity of the proposed Project, and no mining of metallic or non-metallic deposits are within 1,000 feet on either side of the proposed Project. Therefore, O&M of the proposed Project would not result in the loss of known mineral resources, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impact would occur.

#### **Population/Housing**

Construction and O&M of the proposed Project would have no impact on population and housing. The proposed Project would not include building new homes or businesses, or any increase in infrastructure in a manner that would lead to substantial population growth in the area. Construction workers would be drawn from the local labor pool. The proposed Project may require temporary accommodations for construction workers during construction, and this need is anticipated to be met by hotels and motels in the vicinity of the proposed Project. The proposed Project would be unattended and remotely operated, requiring only occasional visits for routine maintenance and emergency repair. No new housing would need to be constructed for temporary construction workers or for personnel during Project O&M.

## Public Services

Construction of the proposed Project would be temporary and short term in nature and would not affect the provision of existing emergency services or require the provision of public services beyond existing capabilities. O&M of the proposed Project would not directly induce growth or create a need for the expansion or construction of new fire and police protection, schools, libraries, hospitals, or other public facilities.

## Utilities and Service Systems

Construction of the proposed Project would provide electrical service to the Electrical Needs Area to address system reliability and it would add capacity to address long-term forecasted demand for electricity. Because construction is temporary it would have a minimal effect on public services and other utilities. During O&M, the proposed Project would not directly induce growth or create a need for the expansion or construction of new wastewater treatment, stormwater drainage, sanitary landfill, or other utility and service systems facilities.

## E.2 Significant Effects that Can Not be Avoided

### E.2.1 Significant Direct Effects of the Proposed Project

Section 15126.2(b) of the State CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. Potential environmental effects of the proposed Project and proposed mitigation measures are discussed in detail in Section C of this EIR. Impacts in the following areas would be significant and unavoidable with construction and operation of the proposed Project even with the incorporation of feasible mitigation measures that attempt to reduce impacts to the extent feasible.

#### **Aesthetics: Substantially Degrade the existing visual character or quality of the site and its surroundings.**

- **Impact AES-6: Long-term presence of the Project would result in landscape changes that degrade existing visual character or quality.** Absent similar structures and character in the existing landscape (aside from intermittent street lights), the proposed new facility would cause a high degree of visual contrast and would be dominant relative to the scale of the existing landscape features at KOP 5 (Lantana Way at Leon Road). The visually prominent structures would attract the attention of the casual observer, and view blockage of higher value landscape features (background sky and ridgelines) would be high. The overall visual change would be high, and in the context of the existing landscape's high visual sensitivity, the resulting visual impact would be significant. No mitigation measures were identified that could reduce impacts, therefore, the significant impact would be unavoidable (Class I). However, Alternative 2: Partial Underground Alternative provides an option for reducing this impact.

#### **Cultural Resources: The proposed Project would disturb human remains, including those interred outside of formal cemeteries.**

- **Impact CR-2: Implementation of the Project would uncover, expose, and/or damage human remains.** Buried human remains have been discovered within a mile of the proposed Project route. The Pechanga tribe noted during initial scoping that the Project area is sensitive for subsurface cultural resources, including human remains. Therefore, a potential exists for unmarked burials to be inadvertently unearthed during construction activities. Treatment of the remains other than protection in place would not reduce the impacts to a less than significant level (Class I).

## E.2.2 Significant Cumulative Effects

According to Section 15355 of the State CEQA Guidelines, the term “*cumulative impacts*” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Individual effects that may contribute to a cumulative impact may be from a single project or a number of separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

This EIR has considered the potential cumulative effects of the proposed Project in Section C. Impacts of the proposed Project, when combined with impacts from past, present, and probable future projects would be considered cumulatively significant for the following issue areas:

- **Cultural Resources: The Project would disturb human remains, including those interred outside of formal cemeteries.** The proposed Project and the other proposed cumulative projects could uncover, expose, and/or damage human remains during construction in the Project area. While the proposed Project may not uncover any sensitive resources during construction, given the sensitivity of the area for cultural resources, the Project could contribute to cumulative impacts in the Project area.

## E.3 Irreversible and Irretrievable Commitments of Resources

Pursuant to Section 15126.2(c) of the State CEQA Guidelines, an EIR must address significant irreversible and irretrievable environmental changes that would be caused by a proposed project. These changes include uses of nonrenewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from project-related accidents.

Development of the SCE’s proposed Project would require a permanent commitment of natural resources resulting from the direct consumption of fossil fuels, construction materials, the manufacture of new equipment that, to a degree, cannot be recycled at the end of the Project’s useful lifetime, and energy required for the production of materials. The proposed Project involves:

- modification of SCE’s existing Valley 500/115-kV Substation (City of Menifee) to equip an existing 115-kV line position and provide protection equipment as required,
- construction of a new approximately 12-mile 115-kV subtransmission line between the Valley Substation and a tubular steel pole (TSP) located at the intersection of Leon Road and Benton Road (Riverside County),
- replacement of approximately 3.4 miles of existing 115-kV conductor from the Leon/Benton Road TSP to an existing TSP (Terminal TSP) located just outside SCE’s 115/12-kV Triton Substation (City of Temecula),
- relocation of existing distribution and telecommunication lines to support the installation of the new 115-kV subtransmission line, and
- installation of telecommunications facilities to connect the proposed subtransmission line to SCE’s existing telecommunication system.

The anticipated equipment, vehicles, and materials required for construction of the proposed Project are detailed in Section B.4 (Project Construction). Maintenance and inspection of the proposed Project and alternatives would not change appreciably from SCE’s existing activities in the Project area, and thus would not cause a substantial increase in the consumption or use of nonrenewable resources.

It is estimated that the total permanent land disturbance for the proposed Project would be approximately ~~14,210~~ acres, while the temporary land disturbance would be approximately ~~194,218~~ acres.

The land disturbance values presented here were taken from Table C.5-9 in Section C.5 (Biological Resources). However, refer to Table B-7 (Subtransmission Approximate Land Disturbance) for the estimated amount of land disturbance for each Project component. ~~is summarized in Table B-7 (Subtransmission Approximate Land Disturbance).~~

As mentioned, an “irreversible or irremediable” commitment of resources includes the use of nonrenewable resources during construction and operation, as well as the creation of long-term or permanent access to previously inaccessible areas, and irreversible damages that occur as a result of project-related accidents. Use of nonrenewable resources that would occur as a result of the proposed Project and alternatives are summarized above. In addition, in accordance with the accepted definition of irreversible or irremediable commitment of resources, following is a discussion of other environmental impacts of the proposed Project and alternatives that would result in an irreversible or irremediable commitment of resources.

## Biological Resources

Construction of the 115-kV subtransmission line would result in approximately 10 acres of permanent and approximately 218 acres of temporary disturbance to native and non-native vegetation. Impacts would include a total of 0.20 acres of permanent and 6.16 acres of temporary impacts to riparian habitats or sensitive natural communities. Construction and operation of the VSSP would result in approximately 0.01 acres of permanent and 4.61 acre of temporary impacts to jurisdictional wetlands and/or waters. With the implementation of the mitigation measures provided in this EIR, adverse impacts to biological resources would be reduced to less than significant.

## Cultural and Paleontological Resources

Cultural and paleontological resources are nonrenewable. Impacts to these resources would constitute an irreversible and irremediable commitment of resources. The VSSP contains 23 known cultural resources (Table C.6-2). These include two multi-component archaeological sites, 13 prehistoric archaeological sites, one historical archaeological site, four historical built environment resources, and two prehistoric isolated artifacts. In addition, the Project study area also includes portions of an informally defined prehistoric archaeological district (P-33-14370).

Portions of the proposed Project would be subject to construction-related ground disturbances, including grading and excavation activities, and the potential to discover paleontological resources during Project development. At least 35 fossil localities within several miles of the proposed Project area, from within the Pauba Formation and Pleistocene age alluvial deposits.

The amount of Project-related ground disturbance would likely be greatest for grading and excavation, which would be required for site preparation at each ~~tower~~ pole location, pulling and tensioning sites, staging areas, the Valley South Substation, and construction, grading, and widening of new spur roads and existing access roads. These activities would disturb the geologic strata at depth and have a high potential to affect buried cultural and paleontological resources. Construction of staging areas and temporary access roads would be limited to surface-disturbing activities; therefore, the potential to adversely affect cultural and paleontological resources as the result of these ancillary activities is low. The EIR has identified 13 mitigation measures (CR-1 to CR-13) to reduce potential impacts to these resources. Most impacts would be reduced to less than significant. However, human remains have previously been identified near the Project area and although the Project may not uncover human remains there is the

potential for uncovering or exposing remains. Therefore, this impact remains significant and unavoidable even with mitigation.

## Visual Resources

The proposed Project would use both existing and new ROW to construct the proposed Project. In the area of new ROW, the proposed Project would change the visual landscape and character of the Project area with prominent facilities, into a predominantly natural-appearing, semi-rural landscape. At certain locations along the route, the subtransmission towers would attract the attention of the casual observer, and in some locations would partially obstruct the view of higher value landscape features (valley floor, background ridgelines, and sky). Affected viewers would include motorists and travelers along Benton Road, Leon Road, Domenigoni Parkway, SR-79, Max Gillis Boulevard, Murrieta Hot Springs Road, Suzi Lane, and Chandler Drive; dispersed rural residential areas along local roads; and recreationists visiting public lands.

It is anticipated that some construction activity would take place at night, which could result in significant adverse night lighting visual effects given the general lack of lighting along portions of the proposed Project route. A limited amount of additional lighting will also be added to the new switchrack at Valley 500/115 kV Substation, and some O&M activity could take place at night, which could result in significant adverse night lighting visual effects. There is also potential for daytime (or nighttime) glare off of the proposed Project's subtransmission structures that could cause undesirable glare effects. However, the potentially significant glare and night lighting effects can be reduced and managed to levels that would be less than significant through effective implementation of Mitigation Measures AES-5 (*Minimize Night Lighting at Construction Sites and Project Facilities*) and AES-6 (*Treat Structure Surfaces*).

## Climate Change

The proposed Project would improve the local electrical distribution system, and help to improve the capacity, reliability, and efficiency of the overall system, which would reduce electricity sector GHG emissions. The construction emissions estimate includes emissions from off-road equipment and on-road vehicles necessary for the construction of the proposed Project. The operation emissions estimate includes emissions from the minor increase in O&M related to annual inspections of the new subtransmission lines and from new electrical equipment that contains SF6. As presented in the Section C.8, the proposed project's annualized GHG emissions would be well below the SCAQMD annual greenhouse gas emissions significance threshold.

## Mineral Resources

The Project would use excavated sand and gravel resources for miscellaneous construction activities throughout the construction phase, including for establishment of roadways and staging areas, and possibly for the implementation of mitigation measures. It is reasonably anticipated that mineral resources required during Project construction would be obtained in the Project vicinity, as sand and gravel resources are prevalent in the area. Therefore, the use of these resources for the proposed Project would not result in the loss of availability of these resources, and potential impacts are considered minimal.

## **E.4 Growth-Inducing Impacts**

Section 15126.2(d) of the State CEQA Guidelines provides the following guidance on growth-inducing impacts: a project is identified as growth inducing if it “could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

Potential growth inducing components of the Project addressed in this section relate to employment and population growth, increased power generation and regional population growth, and increased transmission capacity that serves renewable power development.

Typically, the growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Increases in population may require construction of new community facilities, which could significantly affect the environment. Significant growth impacts could also occur if a project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies. The discussion must additionally address how a proposed project may remove obstacles to growth, or encourage and facilitate other activities that could significantly affect the environment, either directly or indirectly.

### **Direct Growth Caused by Project-Related Employment**

As discussed in Section 3.7 (Social and Economic Effects), construction of the Project would occur over an estimated 16-month period and require a workforce of up to 67 persons. Some amount of the construction workforce would come from the local area or other parts of cities of Menifee, Murrieta, Temecula, and portions of unincorporated southwestern Riverside County. However, some construction workers would likely come from outside a one-hour commute area, or the greater Riverside County area. Because construction work would be temporary, any workers employed from outside the immediate Project are not expected to permanently relocate to the area. Furthermore, operation and maintenance of the Project and alternatives would be conducted by SCE’s existing labor force and would not create new jobs locally or regionally. Therefore, the Project would not generate significant growth from direct employment.

### **Indirect Growth Related to the Provision of Additional Electric Power**

The purpose of the proposed Project is to serve long-term peak electrical demand requirements in the portions of unincorporated Riverside County and the cities of Menifee, Murrieta, and Temecula, served by the Valley-Sun City, Valley-Auld, and Valley-Auld-Triton 115-kV subtransmission lines. The proposed Project consists of Segments 1 and 2 and is 15.4 miles in total length. Segment 1 of the proposed Project involves construction of a new 115 kV subtransmission line originating at SCE’s existing Valley 500/115 kV Substation and connecting at a tubular steel pole (TSP) located at the southeast corner of Leon Road and Benton Road, for a total of 12 miles. Segment 1 of the proposed Project would cross through the City of Menifee, unincorporated Riverside County, and a small portion of the City of Murrieta.

Segment 2 of the proposed Project involves reconductoring a section of the existing Valley- Auld-Triton 115 kV Subtransmission Line. Segment 2 of the proposed Project begins at the TSP located at the southeast corner of Leon Road and Benton Road and continues south to the existing Terminal TSP located on the south side of Nicolas Road, for a total of 3.4 miles. Segment 2 of the proposed Project would cross through unincorporated Riverside County and the City of Temecula. Additionally, SCE may utilize an existing material staging yard outside of Segments 1 and 2 in the City of Perris.

Table E-1 presents historic and future population growth data for unincorporated Riverside County and the cities of Murrieta, Menifee, and Temecula are presented below. The population in unincorporated Riverside County is estimated to increase by 42 percent between 2010 and 2035. The population in the cities of Menifee, Murrieta, and Temecula are estimated to increase between 2010 and 2035 by 53 percent, 17 percent, and 19 percent, respectively.

Year	Unincorporated Riverside County	City of Menifee	City of Murrieta	City of Temecula
2000	420,721	NA <sup>2</sup>	44,282	57,716
2005	523,318	NA	85,769	78,808
2010 <sup>1</sup>	504,392	77,519	103,466	100,097
2020 <sup>3</sup>	471,500	93,100	109,300	109,800
2035	710,600	119,400	121,100	118,900

Notes (SCE, 2014):

1. Decrease in population of Unincorporated Riverside County between 2005 and 2010 can be attributed to the incorporation of areas that were previously unincorporated, such as the City of Menifee.
2. NA = Population information not available because the City of Menifee was incorporated in 2008.
3. California Department of Finance reports the historical data only for the years 2000, 2005, and 2010, while SCAG only provides forecast data for the years 2020 and 2035.

Growth is expected to occur with or without implementation of the proposed Project. The proposed Project would accommodate the anticipated future load growth in a timely manner and would be consistent with local planning documents and policies regarding population growth. Any growth that occurs with the availability of the additional power provided by the proposed Project would need to conform to the local planning documents and policies. An assessment of the potential significant cumulative impacts of the proposed Project is provided above, in Section E.2.2. Although the proposed Project would not directly result in growth in the area, its implementation would remove future obstacles to population growth by facilitating the transmission of future projected power generation in the proposed Project area.

## **E.5 Energy Conservation**

In 1975, Assembly Bill 1575 was adopted by the State Legislature, creating the California Energy Commission (CEC) and amending Public Resources Code Section 21100(b)(3) to require EIRs to examine the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In response, the State Resources Agency created Appendix F of the State CEQA Guidelines to provide guidance on completing this determination. This section includes a discussion to complete the required examination required by the State CEQA Guidelines, Appendix F.

The purpose of the proposed Project is to serve long-term peak electrical demand requirements in the portions of unincorporated Riverside County and the cities of Menifee, Murrieta, and Temecula, served by the Valley-Sun City, Valley-Auld, and Valley-Auld-Triton 115-kV subtransmission lines. The CPUC has been actively promoting conservation for over 30 years, with an intensified effort since the California power crisis in late 2000. The effort in 2001 to expand the State’s energy efficiency programs was seen as an emergency measure to reduce supply shortages and was not meant to be a long-term solution. However, the programs instituted during this period contributed to significant energy savings in California and were extended. The CPUC adopted new energy efficiency goals for 2006 and beyond, and SCE has incorporated these efficiency goals in its long-term procurement plan as well as in the Proponent’s

Environmental Assessment for the proposed Project. However, the ability to achieve incremental savings beyond the baseline level is not known.

Implementation of the proposed Project or any of the alternatives would result in the consumption of energy through fuel needed for construction activities. Fuel would be needed for construction vehicles and construction equipment. Additionally, construction would require the manufacture of new materials, some of which would not be recyclable at the end of the proposed Project's lifetime, and the energy required for the production of these materials would also result in an irretrievable commitment of natural resources. The anticipated equipment, vehicles, and materials required for construction of the proposed Project are detailed in Chapter 2 (Proposed Action and Alternatives).

Several local policies exist that require energy efficiency measures be employed for projects within each plan's jurisdiction. These include the general plans for Riverside County and the cities of Menifee, Murrieta, and Temecula. SCE would improve energy efficiency by demonstrating compliance with these procedures. Furthermore, to meet air quality requirements and save fuel for economic gain, it is to the advantage of SCE to implement energy efficiency and fuel use reduction measures for all on-site equipment.

The proposed Project is not intended to supply power for any particular development project, either directly or indirectly, and would not result in direct growth-inducing impacts. It would, however, facilitate growth indirectly by removing obstacles to population growth through the additional increased capacity of the electrical transmission system that it would make available. Growth in the Project area is expected to occur with or without implementation of the proposed Project. Therefore, the proposed Project would not increase energy consumption above what population growth itself would do.

In summary, no increases in inefficiencies or unnecessary energy consumption are expected to occur as a direct or indirect consequence of the Project. Therefore, no mitigation measures are proposed beyond the policies and procedures set by other entities that already exist.

## **E.6 Intentional Destructive Acts**

### **Introduction**

The number and high profile of international and domestic terrorist attacks during the last decade presents a new and realistic threat to the safety and security of the nation's people, infrastructure, and resources. Extremist organizations have proven to be innovative, opportunistic, and flexible, learning from experience and modifying tactics and targets to exploit perceived vulnerabilities. Current analysis of terrorist goals and motivations points to domestic and international critical infrastructure and key resources (CI/KR) as potentially prime targets for terrorist attacks (DHS, 2013). Furthermore, a recent study completed by the Federal Energy Regulatory Commission (FERC) concluded that attacks in each of the nation's three separate electric systems could cause the power network to collapse (WSJ, 2014).

While the CEQA guidelines do not specifically address the issue of terrorism. However, public concern exists regarding terrorist attacks on regional infrastructure, this section has been developed to qualitatively address environmental consequences that could result from a potential terrorist attack. It should be noted that given the uncertain nature of terrorist attacks (i.e., location, timing, and other factors), there are challenges in determining reasonable thresholds for the likelihood of an attack or the associated environmental consequences. However, the following discussion attempts to present the



potential scenarios and associated consequences as they relate to the likelihood of the proposed Project becoming the target of a terrorist attack.

## Background

The U.S. Department of Homeland Security (DHS) has developed the National Infrastructure Protection Plan (NIPP) to provide an approach for integrating the country's many CI/KR protection initiatives into a single national effort. The NIPP does not provide or recommend specific measures to protect individual resources; however, it does establish national priorities, goals, and requirements for CI/KR protection to direct federal funding and resource application.

The NIPP considers a broad range of terrorist objectives, intentions, and capabilities to assess the threat to various components of CI/KR. Based on that assessment, terrorists may contemplate attacks against CI/KR to achieve three general types of effects:

- **Direct Infrastructure Effects:** Disruption or arrest of critical functions through direct attacks on an asset, system or network, such as an attack on a substation or transmission tower.
- **Indirect Infrastructure Effects:** Cascading disruption and financial consequences for the government, society, and economy through public and private sector reactions to an attack. An operation could reflect an appreciation of interdependencies between different elements of CI/KR. This type of effect could occur if the disruption of electrical service resulting from an attack on the proposed Project consequently resulted in adverse impacts to a sensitive facility such as a hospital, airport, security facility, etc.
- **Exploitation of Infrastructure:** Exploitation of elements of a particular infrastructure to disrupt or destroy another target or produce cascading consequences. Such attacks use CI/KR elements as a weapon to strike other targets, thereby allowing terrorist organizations to magnify their capabilities far beyond what could be achieved using their own limited resources.

The NIPP delineates domestic infrastructure and resources into specific sectors such as Agriculture, Defense, Energy, etc. The Energy Sector includes the "production, refining, storage, and distribution of oil, gas, and electric power, except for commercial nuclear power facilities" (DHS, 2013). While electrical transmission lines are not specifically referred to in this plan, they would generally fall into the category of distribution of electric power and are therefore considered a potential target of terrorist attack. Potential consequences of a terrorist attack on the proposed Project could include:

- Disruption of electrical service,
- Physical damage to system features and surrounding facilities, and
- Personal injury or loss of human life.

## Potential Environmental Consequences

The proposed Project would include new and upgraded electric subtransmission lines, modification to an existing substation, and relocation of existing distribution and telecommunication lines to serve long-term peak electrical demand requirements in portions of unincorporated Riverside County and the cities of Menifee, Murrieta, and Temecula, served by the Valley-Sun City, Valley-Auld, and Valley-Auld-Triton 115-kV subtransmission lines. The proposed Project is also needed to enhance electrical system reliability and operational flexibility; meet the Project needs while minimizing environmental impacts; and design and construct the Project in conformance with SCE's current engineering, design, and construction standards.

The electrical grid of which the proposed Project would be a part is a looped system with substations configured to permit electrical loads to flow across various paths from the source substation at all times. This allows for an alternate path to immediately absorb the entire load of a substation in the event that another path is interrupted. A terrorist attack on the proposed Project would likely result in reduced or disrupted electricity transmission to the regional electric grid. As is common practice when a line is down, the utility would have to re-route power around the affected substation or transmission line to serve the southern California load, and an outage could occur for some period of time while the system was modified to provide service from other locations. Therefore, the regional transmission system is interconnected in such a way that it is generally not possible that a single line outage would cause an outage at a specific sensitive facility, such as a hospital, airport, security facility, etc. In addition, major facilities would also have back up power/generators to prevent electricity interruptions in the event of an outage, such as would occur with a terrorist attack on a transmission line.

The Valley Substation associated with the proposed Project would be unstaffed and function as a remotely controlled substation. Operators would perform station inspections when there is an indication of trouble, or minimum of once per year via ground and/or aerial observations. Therefore, an attack on this substation is unlikely to result in a high incidence of human injury or mortality.

A terrorist attack on the subtransmission line could also result in downed towers. It is possible that subtransmission poles/towers could partially or fully collapse as a result of a terrorist attack, potentially resulting in property damage and/or injury or mortality to people in the immediate vicinity.

By nature, the purpose of terrorism is to create and promote fear among populations, as well as (and through) death, destruction, and disruption of a targeted population's or facility's ability to effectively carry out its intended function and/or to eliminate or limit peaceful living and commerce. While the possibility of a terrorist attack on the proposed Project exists, the proposed Project is not considered to be a high level or likely target for attack, because consequences of a potential attack while serious and adverse would not result in catastrophic consequences to the regional electric grid. Any human injury or death resulting from a terrorist attack would be serious, tragic, and difficult to prevent; however, the overall risk of an attack on the proposed Project is not considered likely.