6.0 OTHER CEQA CONSIDERATIONS

This chapter of the Proponent's Environmental Assessment (PEA) provides a discussion of additional considerations of the California Environmental Quality Act (CEQA). These considerations include the potential for construction and operation of Southern California Edison's (SCE's) proposed Banducci Substation and associated facilities (Proposed Project) to result in impacts not evaluated in Chapter 4.0, Environmental Impact Assessment, of this PEA. Specifically, the CEQA considerations evaluated in this section are as follow:

- Cumulative impacts assessment
- Growth-inducing impacts
- Significant environmental effects of the Proposed Project
- Mandatory findings of significance

6.1 Cumulative Impact Assessment

CEQA requires lead agencies to consider the cumulative impacts of proposed projects under 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 Environmental Impact Report (EIR) together with other projects causing related impacts" (Section 15130[a][1]). The cumulative impacts analysis "shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects" (Section 15130[b][5]).

Section 15130(a)(3) also states that an environmental document may determine that a proposed project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable, and therefore not significant, if a project is required to implement or fund its fair share of mitigation measure(s) designed to alleviate the cumulative impact.

In conducting a cumulative impacts analysis, impacts are referenced to the temporal span and spatial areas in which the project would cause impacts. Additionally, a discussion of cumulative impacts must include either (1) a list of past, present, and reasonably foreseeable future projects, including, if necessary, those outside the lead agency's control; or (2) a local, regional or state-wide plan, or related planning document that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency (Section 15130[b][1]).

Projects Considered in Cumulative Analysis

The cumulative impact assessment identifies the potential cumulative impacts caused by the Proposed Project when considered along with other projects in the surrounding area, including past, present, and reasonably foreseeable projects. The projects that were considered in this cumulative impact assessment were identified through a review of the potential projects listed in the vicinity of the Proposed Project Study area by the Kern County and City of Tehachapi planning departments.

Although there are a number of reasonably foreseeable projects in Kern County, including the Tehachapi Renewable Transmission Project and the Tehachapi Solar Project, these projects would be located more than 7 miles away from the nearest telecommunications facilities that is associated with the Proposed Project, and at least 17 miles away from the proposed Banducci Substation. Additionally, the Cummings Valley Solar Project, which would have been located 0.72 mile northeast of the proposed Banducci Substation site is no longer proposed, as the Kern County Board of Supervisors denied the project in late 2011 and the project's proponent withdrew an appeal the Board's decision in 2012.[1] As a result, only one project has been considered in this assessment: the Tehachapi Municipal Airport Master Plan.

Tehachapi Municipal Airport Master Plan

The Tehachapi Municipal Airport Master Plan was last completed in 2004. Another update to the Tehachapi Municipal Airport Master Plan is anticipated in response to the City of Tehachapi Airport Commission's call for an update of the Tehachapi Airport Master Plan in 2011. The Tehachapi Airport Master Plan would provide guidance for future development and expansion of the Tehachapi Airport and the surrounding area, which includes portions of the Proposed Telecommunications Route 2. Portions of the proposed telecommunications facilities would be located within an area covered by the Tehachapi Airport Master Plan update area. SCE would notify the Federal Aviation Administration (FAA) of the Proposed Project's related alterations in accordance with 49 CFR Part 77. Coordination with the FAA would ensure that the construction and operation of the Proposed Project would be consistent with the FAA's requirements and is not expected to significantly contribute to the cumulative impacts associated with the Proposed Project.

Cumulative Impact Analysis

The incremental impacts of the Proposed Project when added to other past, present, or reasonably foreseeable future projects would not have the potential to result in cumulatively considerable impacts. Potential impacts associated with the Proposed Project would be less than significant. Moreover, as discussed below, the activities associated with the Proposed Project

[1] See the Kern County Board of Supervisors Summary of Proceedings, November 10, 2011 and the Tehachapi News (online) article Solar Project Withdrawn (dated January 26, 2012).

would be geographically isolated and therefore would not increase or create impacts that would contribute to cumulative impacts.

The following sections discuss the cumulative impacts of each environmental resource category.

Aesthetics

Construction and operation of the Proposed Project would result in less than significant impacts to visual resources. The effects to aesthetics resulting from construction and operation of the Proposed Project are believed to represent an incremental, but not significant, change in the visual character in the area, but would have a less than significant effect on aesthetics. This incremental, but not significant, change, when considered in conjunction with the aesthetic changes that would occur with the other development projects approved by the local agencies, would not significantly affect the visual character or quality of the area.

Cumulative impacts to aesthetics would be less than significant.

Agriculture and Forestry Resources

The substation component of the Proposed Project would be located on land that is designated as Prime Farmland in the Farmland Mapping and Monitoring Program (FMMP). However, the Proposed Project would result in the conversion of a relatively minor amount of Prime Farmland and, considering the substantial amount of farmland in the area surrounding the Proposed Project, such conversion would be less than significant. This land is not designated as Unique Farmland or Farmland of Statewide Importance.

The proposed telecommunications routes would be located on existing SCE easements and would not change the use of the land. The telecommunications routes would largely be located adjacent to land designated by the FMMP as Urban and Built-Up Land or Grazing Land (CDC, 2008). While portions of the telecommunications routes would be located adjacent to land designated by the FMMP as Prime Farmland, the telecommunications cables would be compatible with agricultural uses of the land as noted earlier (Kern County, 2009). Installation of the telecommunications components would not convert land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use.

Cumulative impacts to agriculture and forestry resources would be less than significant.

Air Quality

Construction and operation of the Proposed Project would have a less than significant impact to air quality. The Proposed Project would be constructed in compliance with the established rules and guidelines as adopted by the Eastern Kern Air Pollution Control District (EKAPCD) and would not exceed any thresholds established by EKAPCD. Construction activities would not be expected to exceed the established air quality related emissions thresholds for the area. Construction of the other projects listed in the cumulative impact analysis may contribute to

adverse air quality, but the Proposed Project has been designated in an area that has been designated as noncompliance for ozone (O_3) and particulate matter (PM_{10} and $PM_{2.5}$). Fugitive-dust controls and other protective measures similar to those discussed for the Proposed Project would likely reduce impacts to less than significant for these projects.

During operation of the Proposed Project, emissions would be limited to those produced from vehicles that would be necessary for periodic inspection, maintenance, and repair. No stationary emissions sources would be associated with the Proposed Project. These intermittent visits would not contribute significantly to cumulative impacts to air quality.

Cumulative impacts to air quality would be less than significant.

Biological Resources

Construction and operation of the Proposed Project would not be expected to have impacts to biological resources that could not be reduced to less than significant levels with the implementation of Applicant Proposed Measures (APMs). The other project considered in the cumulative impact analysis could occur on undisturbed land. This project may have cumulative impacts to biological resources, especially wildlife corridors, but the footprint of the Proposed Project would not be expected to significantly impact wildlife corridors. Biological resources effects from the Tehachapi Municipal Airport Master Plan, if significant, would be appropriately mitigated, and would not be cumulatively considerable when combined with the effects to biological resources from construction and operation of the Proposed Project.

Cumulative impacts to biological resources would be less than significant.

Cultural Resources

Impacts to cultural resources as a result of the Proposed Project would be less than significant. The other project considered in the cumulative impact analysis may have significant impacts to cultural resources. However, because the Proposed Project would have less than significant impact to cultural resources, the Proposed Project, when combined with the impacts of other project in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts to cultural resources would be less than significant.

Geology and Soils

Impacts related to geology and soils associated with the Proposed Project would be less than significant. When considering the effects that could be cumulatively considerable, such as the loss of topsoil, the potential impacts from the Proposed Project and other project would be minimized by existing laws, regulations, and ordinances that require projects to obtain grading permits and implementation of Storm Water Pollution Prevention Plans (SWPPPs).

Cumulative impacts to geology and soils would be less than significant.

Greenhouse Gas Emissions

The EKAPCD has not formally adopted recommendations or official guidance to evaluate the significance of greenhouse gas (GHG) emissions for projects within the Mojave Desert Air Basin (MDAB), in which the EKAPCD is not the lead agency. The EKAPCD has adopted an addendum to its CEQA Guidelines, *Addressing GHG Emission Impacts for Stationary Source Projects When Serving as the Lead CEQA Agency*. The recommended threshold for GHG emissions is 25,000 tons per year of carbon dioxide-equivalent (CO_2e).

As the lead agency for the Proposed Project, the California Public Utilities Commission (CPUC) has elected to use a more conservative approach to the determination of significance of GHG emissions based on the interim GHG significance thresholds recommended by the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted an interim operational significance threshold of 10,000 metric tons of CO_2e per year for stationary sources (SCAQMD, 2008). Given the Proposed Project's proximity to the SCAQMD, the SCAQMD's significance threshold is the most applicable GHG significance threshold for the Proposed Project.

As discussed in Section 4.7, Greenhouse Gas Emissions, the total of amortized construction emissions and annual operational GHG emissions associated with the Proposed Project would be 45 metric tons CO_2e per year. Although operation of the other projects in the cumulative impact analysis may result in an increase in GHG emissions, the Proposed Project's contribution to cumulative impacts would not be considerable, as the Proposed Project's GHG emissions would be much less than the SCAQMD's significance threshold.

Cumulative impacts from GHG emissions would be less than significant.

Hazards and Hazardous Materials

Construction and operation of the Proposed Project would not result in significant impacts to hazards or hazardous materials. No other development project in the cumulative impact analysis would contribute to the cumulative impacts of hazardous materials. Because the Proposed Project would have less than significant impact to hazards and hazardous materials, the Proposed Project, when combined with the impacts of other projects in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts from hazards and hazardous materials would be less than significant.

Hydrology and Water Quality

Construction and operation of the Proposed Project would not result in significant impacts to hydrology and water quality. Evaluation of the Proposed Project components in a cumulative impact analysis found that the Proposed Project would not substantially interfere with existing drainage patterns, nor create additional storm water runoff. Additionally, implementation of project-specific grading permit(s) and SWPPP would protect water quality.

Cumulative impacts to hydrology and water quality would be less than significant.

Land Use and Planning

Construction and operation of the Proposed Project would not result in significant impacts to land use and planning. The other development project listed in the cumulative impact analysis would be permitted through local agencies and as such, would be compatible with applicable land use regulations, and any cumulative impacts to land use and planning would be evaluated and addressed by the local agencies during that project's CEQA process.

Cumulative impacts to land use and planning would be less than significant.

Mineral Resources

Construction and operation of the Proposed Project would not result in significant impacts to mineral resources. Because the Proposed Project would not result in significant impacts to mineral resources, the Proposed Project, when combined with the impacts of the other project in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts to mineral resources would be less than significant.

Noise

Construction and operation of the Proposed Project would not result in significant impacts to noise. The other development project that is part of the cumulative impact analysis may also generate noise during construction, but the noise generated by the construction of the Proposed Project would occur intermittently over a period of approximately twelve months, and would not be considered cumulatively considerable.

Operation of the other development project in the cumulative impact analysis may result in an increase in ambient noise due to the increased traffic from the projects, but the noise due to the operation of the Proposed Project in addition to the noise produced by the other development project would not be considered cumulatively considerable.

Cumulative impacts to noise would be less than significant.

Population and Housing

Construction and operation of the Proposed Project would not result in significant impacts to population and housing. Because the Proposed Project would not result in significant impacts to population and housing, the Proposed Project, when combined with the impacts of the other project in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts to population and housing would be less than significant.

Public Services

Construction and operation of the Proposed Project would not result in significant impacts to public services. Because the Proposed Project would not result in significant impacts to public services, the Proposed Project, when combined with the impacts of the other project in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts to public services would be less than significant.

Recreation

Construction and operation of the Proposed Project would not result in significant impacts to recreation. Because the Proposed Project would not result in significant impacts to recreation, the Proposed Project, when combined with the impacts of the other project in the vicinity, would be less than significant and not cumulatively considerable.

Cumulative impacts to recreation would be less than significant.

Transportation

Construction and operation of the Proposed Project would not result in significant impacts to transportation. The other development project that is part of the cumulative impact analysis may also generate traffic during construction (or road/lane closures), but the traffic generated during the construction of the Proposed Project would occur for a short period of time, and would not be cumulatively considerable.

Operation of the other projects in the cumulative impact analysis may result in an increase in traffic from the other development project, but the traffic associated with the operation of the Proposed Project when considered in addition to other development would not be cumulatively considerable.

Cumulative impacts to transportation would be less than significant.

Utilities and Service Systems

Construction and operation of the Proposed Project would not result in significant impacts to utilities and service systems. Any significant impacts to utilities and service systems due to the construction and operation of the other development project in the cumulative impact analysis would be addressed by the local agencies during that project's CEQA process. The Proposed Project would not have a cumulatively considerable impact to utilities and service systems.

Cumulative impacts to utilities and service systems would be less than significant.

6.2 Growth-Inducing Impacts

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines states that environmental documents should "...discuss the ways in which the [P]roposed [P]roject could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment..."

6.2.1 Significance Criteria

In this discussion, it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the 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
- Encourages and facilitates other activities that could significantly affect the environment, either individually or cumulatively

6.2.2 Impact Analysis

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. As discussed in Chapter 1.0, Purpose and Need, of this PEA, the purpose of the Proposed Project is to serve an existing need for electricity in the Proposed Project Study Area. As discussed in Chapter 3.0, Project Description, the construction and operation of the Proposed Project would not substantially affect employment in the area. Construction would be performed by either SCE construction crews or contractors, and in general, construction workers would be drawn from the local labor pool. Operation of the Proposed Project would require occasional electrical switching and routine maintenance; however, it would not require dedicated, full-time personnel.

The Proposed Project is not designed to facilitate growth in the community, either directly or indirectly. It would accommodate growth in the area that is planned or approved by local land use authorities, but it would not, by itself, induce growth.

As further discussed in Section 4.13, Population and Housing, of this PEA, the Proposed Project would not include components that would result in impacts to population, housing, employment,

or other aspects that could either directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding area.

Would the Proposed Project remove obstacles to population growth?

No Impact. The Proposed Project would not be expected to remove land use restrictions or other obstacles to population growth. The Proposed Project has been proposed in order to accommodate electrical needs and demands in the area, rather than as a stimulant for development in the area. Although the Proposed Project would increase the reliability with which electricity is made available, the objective of the Proposed Project is not to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Obstacles to population growth in the region served by the Proposed Project are primarily due to feasibility of development, economic constraints, permitting, and other development restrictions and regulations administered by local agencies. The Proposed Project would not affect the feasibility of developing in the area, remove an obstacle to growth, or affect development restrictions administered by local agencies.

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

No Impact. As discussed in Section 4.13, Population and Housing of this PEA, the Proposed Project would not include the construction of housing or include residential or community facilities components. However, the Proposed Project would involve the construction of new access roads for construction and ongoing maintenance. The new access roads would not extend public services to an area not presently served by electricity. The Proposed Project is designed to respond to existing growth and demand trends.

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

No Impact. The Proposed Project is the result of an electrical need and demand in the area rather than a precursor to development in the area. Although the Proposed Project would increase the reliability with which electricity is made available, the Proposed Project would not provide a new source of electricity or encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

6.3 Significant Environmental Effects of the Proposed Project

In accordance with Section 15126.2 of the CEQA Guidelines, this section of the PEA affirms that the Proposed Project does not have the potential to result in significant environmental effects.

6.4 Mandatory Findings of Significance

This section of the PEA provides an analysis of the mandatory findings of significance associated with construction and operation of the Proposed Project and its alternatives. In accordance with the CEQA Guidelines Section 15064 (a through h), this PEA section provides substantial evidence that is used to support the determination of whether the Proposed Project would result in significant environmental impacts.

6.4.1 Significance Criteria

Appendix G of the CEQA Guidelines provides the criteria used in determining whether project-related impacts would be significant. Impacts resulting from the Proposed Project could be considered significant if they have the potential to create substantial impacts when the following questions are considered. Would 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 periods of California history or prehistory?

- 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 probable future projects)?

- Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

6.4.2 Impact Analysis

Does the 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 periods of California history or prehistory?

The Proposed Project would not 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 periods of California history or prehistory.

As discussed in Section 4.4, Biological Resources, although construction of the proposed Banducci Substation would be expected to remove up to 6.1 acres of agricultural land that contains foraging (but not nesting) habitat for several wildlife species, this amount would be considered relatively minor when compared to the availability of habitat in the region. There would also be approximately 6.5 acres of foraging habitat that would be temporarily impacted by the proposed subtransmission facilities. Since the expected habitat loss is relatively minor compared to the more than 13,000 acres of potential habitat for these species in the region, and because no impacts to nesting habitat would be expected to occur, impacts to these species would be considered adverse but less than significant.

The Proposed Project would not entail components that would otherwise 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.

As described in Section 4.5, Cultural Resources, potential impacts to cultural resources (including important examples of the major periods of California history or prehistory) would be avoided during construction and operation activities associated with the Proposed Project and it would not be expected to eliminate important examples of the major periods of California history or prehistory. The Proposed Project would be expected to result in less than significant impacts related to these criteria.

Does the 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 probable future projects)?

As discussed in Section 6.1, Cumulative Impact Assessment, the Proposed Project would not be expected to increase or create incremental impacts that would contribute to cumulatively considerable impacts.

Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As discussed in Chapter 1.0, Purpose and Need, of this PEA, the Proposed Project has been specifically designed by SCE to respond to the growth and anticipated electrical demand of the area that is currently served by Cummings Substation. The Proposed Project would result in benefits that would directly increase the service capacity and efficiency of the public service for the existing and anticipated consumers in the vicinity. The Proposed Project is designed to support an existing infrastructure and the existing electrical systems in and around the Proposed Project site.

Indirectly, the Proposed Project would reduce the electrical load demands on the existing systems, which would in turn increase the safety and reliability of the systems through the anticipated growth phase as well as during unanticipated natural or man-made events. The Proposed Project would not be expected to substantially alter the physical environment or to result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly (see Section 6.2, Growth-Inducing Impacts).