5.18 Mandatory Findings of Significance

3 5.18.1 Environmental Impacts and Assessment

4

1 2

5 This section discusses mandatory findings of significance, as well as potential cumulative and growth-

6 inducing impacts, related to the Sanger Substation Expansion Project (proposed project) proposed by

7 Pacific Gas and Electric Company (PG&E, or the applicant). California Environmental Quality Act

8 (CEQA) Guidelines Section 15065 requires that the lead agency determine whether the proposed project 9 would have a significant effect on the environment. Table 5.18-1 contains the criteria for making the

9 would have a significant effect on the environment. Table 5.18-1 contains the criteria for making the10 determination.

10

Table 5.18-1 Mandatory Findings of Significance Criteria

	<u> </u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a.	Does the project have the potential to substantially 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, substantially 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?				
b.	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)?				
C.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

12

a. Does the project have the potential to <u>substantially</u> degrade the quality of the environment,
substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels,
threaten to eliminate a plant or animal community, <u>substantially</u> 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?

19 Biological Resources

Areas impacted by construction and operation of the proposed project provide minimal foraging habitat

for some special status bird species; abundant foraging habitat would still be available surrounding the project area and within range of such species. The proposed project therefore would not degrade

22 project area and within range of such species. The proposed project merefore would not degrade
 23 environmental quality through habitat modification or substantially reduce the habitat of a fish or wildlife

24 population to drop below self-sustaining levels.

25

The proposed project area is heavily modified agricultural land with no native plant species. Plants in the project area consist mainly of seasonal agricultural crops. The proposed project would not threaten to

- 1 eliminate a plant community. The area provides marginal foraging habitat for some general wildlife and
- 2 potentially for some special status species; there is abundant similar land adjacent to the project area and
- 3 in the immediate vicinity of the project area. The proposed project would not threaten to eliminate an animal community.
- 4 5
- 6 No special status plant species have been located on site or have the potential to be found on site. The 7 proposed project would not substantially reduce the number or restrict the range of any rare or endangered 8 plant species.
- 9
- 10 There is a moderate potential for Swainson's hawk (*Buteo swainsoni*) to occur in the project area. There is 11 low potential for burrowing owl (Athene cunicularia), loggerhead shrike (Lanius ludovicanus), San
- 12 Joaquin kit fox (Vulpes macrotis mutica), and white-tailed kite (Elanus leucurus) to occur in the project
- 13 area. Observations of pallid bat (Antrozous pallidus) and western red bat (Lasiurus blossevillii) have not
- 14 been reported within a 10-mile radius of the project area. As discussed in greater detail in Section 5.4,
- 15 "Biological Resources," the applicant would implement Applicant Proposed Measures (APMs) as part of
- 16 the proposed project; however, not all APMs were applied to reduce impacts. APM BIO-9 and APM
- BIO-11 were applied to reduce impacts to biological resources. APM BIO-9 would prohibit pets and 17
- 18 firearms in the project area. APM BIO-11 would require inspection of excavation sites prior to backfilling
- 19 and placement of structures.
- 20
- 21 Impacts to all species would remain significant even with these APMs. The applicant would be required 22 to implement several mitigation measures as well, including Mitigation Measure (MM) BIO-1, which 23 would ensure that all construction personnel are aware of the special status species in the area and the 24 project commitments to reduce impacts; MM BIO-2, which would ensure that preconstruction surveys for
- 25 special status species are performed prior to construction; MM BIO-3, which would ensure that special
- 26 status species in the project vicinity are monitored to reduce disturbance by project activities to the fullest
- 27 extent possible; MM BIO-4, which would ensure that a qualified avian biologist identifies any active
- 28 nests prior to construction and would implement the appropriate nest buffers; MM BIO-5, which would
- 29 reduce harassment and potential vehicle strikes of wildlife; MM BIO-6, which provides specific protocols
- 30 for burrowing owl surveys; and MM BIO-7, which would describe protocols for Swainson's hawk 31 specifically. With mitigation, the proposed project would not substantially reduce the number or restrict
- 32 the range of any rare or endangered animal species. There are no known native wildlife nursery sites or
- 33 migratory routes for any native resident or migratory fish or wildlife species in the project area. The
- 34 proposed project would not fragment any wildlife habitat. The impacts would be less than significant after
- 35 implementing the above-stated mitigation measures and APMs.

36 37 **Cultural Resources**

- 38 The proposed project would not eliminate important examples of major periods of California history or
- 39 prehistory. There are no known resources in the project area that would qualify as important historical
- 40 examples of this type. Though it is unlikely that such a resource would be discovered during excavation,
- 41 there is potential for discovery. Damage to such a resource would be a significant impact. As discussed in
- 42 greater detail in Section 5.5, "Cultural Resources," PG&E has proposed APM CUL-1 and CUL-3,
- 43 respectively, to train workers on cultural resources in general and to outline the process to follow in the
- 44 event that a cultural resource is discovered. Impacts would still be significant after implementation of
- 45 these APMs. The applicant would be required to implement several mitigation measures, including MM
- 46 CUL-1, which would supersede APM CUL-3 and require preparation of a Cultural Monitoring and
- 47 Treatment Plan that has procedures for unanticipated discovery of resources, and MM CUL-2, which
- 48 would supersede APM CUL-1 and would in part require training workers on cultural resources that may
- 49 be encountered at the site. The proposed project would not eliminate important examples of major periods
- 50 of California history or prehistory after implementation of mitigation. With the implementation of MM 51
- CUL-1 and MM CUL-2, impacts under this criterion would be less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable?

4 Cumulative Impacts

A cumulative impact is when "two or more individual effects which, when considered together, are
considerable or which compound or increase other environmental impacts" (CEQA Guidelines section
15355).

9 Cumulative Scenario

In discussing cumulative impacts, the CEQA Guidelines outline two approaches for characterizing
 projects that may occur in the vicinity of a proposed project:

12 13

14

15

20

8

1 2

3

- 1. **Project list:** A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the agency (CEQA Guidelines section 15130(b)(1)(A)).
- Summary of projections: A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect (CEQA Guidelines section 15130(b)(1)(B)). This summary can be supplemented with additional information, including a regional modeling program.
- This document uses both approaches, depending on which is more appropriate for the resource area being analyzed. The approach selected depends on the resource area and the nature and character of expected impacts. The rationale for selecting an approach is provided in the cumulative impacts discussion for each resource area.

2526 Projects Considered

27 Table 5.18-2 includes a list of projects considered in the cumulative impacts analysis. The list in Table

- 28 5.18-2 was compiled by contacting local and state agencies regarding planned projects and projects
- 29 currently under construction. PG&E was also queried to determine if they had any planned projects near 30 the proposed project. The following agencies were queried:
- 31
- Fresno County
- City of Sanger
- U.S. Forest Service, Sierra National Forest
- California Department of Transportation (Caltrans)
- Federal Energy Regulatory Commission (FERC)

- 32
- 33 No Caltrans, FERC, U.S. Forest Service, or PG&E projects were identified for inclusion in the
- cumulative impacts analysis in this section. No projects were identified in the vicinity of the Fence
 Meadow Repeater Station: therefore, the antenna system component at the Fence Meadow Repeater
- Meadow Repeater Station; therefore, the antenna system component at the Fence Meadow Repeater
 Station was not evaluated for cumulative impacts in this section. Generally, projects within 5 miles were
- 37 station was not evaluated for cumulative impacts in this section. Generally, projects within 5 miles wer avaluated for inclusion in the cumulative impacts analysis. Projects carried forward for analysis in this
- section had to be probable future projects with impacts that would combine with impacts of the proposed
- 39 project.

No.	Project Name	Project Description	Location and Distance from Existing Sanger Substation	Status
1	Royal Woods Subdivision - Phase 3	This subdivision includes the construction of 187 homes. The project also includes various improvements such as sidewalks, drainage facilities, water mains, utilities, and landscaping. The site is located on about 50 acres.	Northeast of intersection of East Jensen Avenue and South Indianola Avenue; 1.5 miles east of existing Sanger Substation	Under construction; as of October 2015, 74 lots had been completed. Phase 3 will include construction of 93 additional homes and will be completed by February 2017.
2	Agricultural Commercial Center (Fresno County CUP Application No. 3349)	This commercial center would include a gas station and market. The site would be located on about 1.8 acres.	Southeast of intersection of State Route 180 and McCall Avenue; 1.9 miles north of existing Sanger Substation	Approved: The project was approved in April 2014. There was no construction on the site as of March 2015. Construction schedule is unknown.
3	Vita Pakt Citrus Products Company Commercial Dehydrator Facility Expansion (Fresno County CUP Application No. 3497)	This project would involve almost 28,000 square feet of new buildings on about 4.4 acres for fruit and vegetable processing. The new building would replace about 31,000 square feet of existing facilities.	8898 East Central Avenue in Del Rey, California; 2.1 miles southwest of existing Sanger Substation	Approved. The project was approved in August 2015.
4	Rezone of AE20 to C2, and General Plan Amendment	This project would involve a general plan amendment and rezoning of 5.22 acres from agricultural use to commercial use for a community shopping center. Future uses could include retail, office, and public facilities.	East of North McCall Avenue, about 420 feet north of intersection with State Route 180; 2.0 miles north of existing Sanger Substation	Approved. The amendment was approved in 2014. There was no construction on the site as of March 2015. No known application for construction has been submitted.

Table 5.18-2 Cumulative Project List

Sources: Sheppard 2015; City of Sanger 2016b; Fresno County 2014a; PG&E 2015; Motta pers. comm. 2015; Fresno County 2014b; Google Earth 2015; Fresno County 2014c

- 1 The projects located near the proposed project were evaluated to determine whether they would contribute
- 2 to a cumulatively significant impact and whether the proposed project would make a cumulatively
- 3 considerable contribution to that significant cumulative impact. The locations of the cumulative projects 4 are shown on Figure 5.18-1.
- 5
- 6 Not all projects are considered part of the cumulative scenario for all impacts. The potential for
- 7 cumulative impacts on a given resource is in part dictated by geographic scope. For example, cumulative
- 8 noise and vibration impacts are highly localized because both attenuate over distance. For each resource
- 9 category, a geographic scope is given and applied to limit the list of projects considered in the cumulative impact analysis.
- 10 11

12 **Cumulative Impacts**

13 **Resources with No Impacts**

14 The proposed project would have no impact and would therefore not contribute to a cumulative impact on 15 the following resources:

16 17

22

- Land Use and Planning
- 18 • Mineral Resources
- 19 **Public Services** •
- 20 21 These resource areas are therefore not discussed in this section.

23 Aesthetics

24 Aesthetic and visual resource impacts are project-specific and highly localized; therefore, the list

- 25 approach was used to evaluate potential cumulative impacts. The geographic scope of cumulative impacts
- 26 on aesthetics includes all areas where more than one project would be visible with the proposed project in
- 27 the same public view. None of the cumulative projects are located within the same public view as the
- 28 proposed project because all projects are at least 1.5 miles away from the proposed project across
- 29 relatively flat land. Therefore, there would be no cumulatively significant impact.
- 30

31 Agriculture and Forestry Resources

32 The projections approach is used for agriculture and forestry resources, since these resources are in

- 33 general managed at a regional level. The geographic scope of cumulative impacts on agriculture resources
- 34 includes the entirety of Fresno County because agricultural resources are typically managed at the county
- 35 level. Cumulative impacts for agriculture resources include lands designated as Prime Farmland and
- Farmland of Statewide Importance in Fresno County. The County of Fresno contains over 678,000 acres 36
- 37 of Prime Farmland and over 404,000 acres of Farmland of Statewide Importance (CDC 2014).
- 38
- 39 The proposed project would not impact forestry resources (significance criteria (c) and (d)) and therefore
- 40 would not contribute to a cumulative impact for these resources. The proposed project would not involve
- 41 other changes that would result in conversion of forest land to non-forest use (significance criterion (e)) 42
- and therefore would not contribute to a cumulative impact for these resources. The proposed project
- 43 would not conflict with a Williamson Act contract or agricultural zoning and therefore would not
- 44 contribute to a cumulative impact (significance criterion (b)). Furthermore, no countywide impacts
- 45 involving other activities that would result in conversion of agricultural land to non-agricultural use have
- been identified in the Fresno County General Plan; therefore, the proposed project would not contribute to 46 47 a cumulative significant impact (significance criterion (e)). Significance criteria (b), (c), (d), and (e) are



- Existing Line to be Removed
- New Line Installed
- **Proposed Substation Expansion Footprint**
- **Existing Substation Footprint**

Sources: PG&E 2015, ESRI 2012 Basemap: NAIP 2014

Figure 5.18-1 Locations of **Cumulative Projects** Sanger Substation Fresno County, CA

1 Construction and Operation and Maintenance

Construction of the proposed project would temporarily impact 21.84 acres of Farmland. Of this, 14.94
 acres of Prime Farmland and 6.9 acres of Farmland of Statewide Importance would be disturbed. The

4 proposed project would permanently disturb and convert 7.15 acres of land to non-agricultural use; 7.09

5 acres are designated as Prime Farmland, and 0.05 acres are designated as Farmland of Statewide

6 Importance. The Fresno County General Plan Environmental Impact Report (EIR) states that, under the

7 General Plan, up to 37,373 acres of prime and/or important farmland would be converted to urban land

uses to the year 2020. Similarly, the loss of agricultural production is identified as a significant and
 unavoidable impact (Fresno County 2000). This represents a significant cumulative agricultural impact

9 unavoidable impact (Fresno County 2000). This represents a significant cumulative agricultural impact,
 10 and the proposed project would contribute to the significant cumulative impact through conversion of

Farmland during construction and operation. However, the proposed project's contribution to the

12 significant cumulative impact would not be cumulatively considerable. For mitigation of direct

13 conversion impacts, the Fresno County General Plan EIR indicates policies related to:

- 14
- 15 Residential development on agricultural land
- Minimum parcel size in agricultural areas
- Preference of siting uses in urban areas
- 18 Directing urban growth away from agricultural areas
- 19 20

• Avoiding encroachment of and conflicts with incompatible land uses. (Fresno County 2000)

21 Mitigation listed in the General Plan EIR indicates that projects related to electric conveyance are not a 22 key impetus for agricultural land conversion. Furthermore, substations are listed in the General Plan 23 policies as an allowed use under certain conditions (Policy LU-A.3); Sanger Substation is an existing use, 24 so the proposed project would be part of an already allowed use at the site consistent with the General 25 Plan. Given that the proposed project is not of the type that is chiefly responsible for agricultural land conversion as indicated by General Plan Policies, and given the small acres temporarily and permanently 26 27 converted to non-agricultural use by the proposed project, the proposed project would not make a 28 cumulatively considerable contribution to agricultural land conversion (significance criterion (a)). 29

30 Air Quality

31 The list approach was used to determine localized air quality impacts, such as odor and exposure of

32 sensitive receptors to substantial air pollutants. The geographic extent for exposure of receptors to

33 substantial pollutant concentrations is 1,000 feet due to eventual dispersion of most diesel particulate

34 matter at that distance from concentration of trucks (CARB 2005). There are no projects within 1,000 feet

35 of Sanger Substation; therefore, the proposed project would not contribute to a cumulative exposure

36 impact to sensitive receptors (significance criterion (d)). The geographic extent for odor impacts is 36

37 feet, given that is the maximum distance at which perception of diesel exhaust emissions can be perceived

38 (Colucci and Barnes 1970). There are no projects within 36 feet of the substation sites; therefore, the

39 proposed project would not contribute to a cumulative odor impact (significance criterion (e)).

40 Significance criteria (d) and (e) are not further discussed.

41

42 To characterize basin-wide impacts, this analysis used a comparison to significance thresholds adopted by

43 the San Joaquin Valley Air Pollution Control District (SJVAPCD), per the projections approach. The

44 SJVAPCD has adopted several attainment plans that outline the long-term strategies designed to achieve

45 compliance with National Ambient Air Quality Standards and California Ambient Air Quality Standards.

46 According to the SJVAPCD (2015 par. 7.12, page 65), "projects with emissions below the thresholds of

47 significance for criteria pollutants would be determined to 'Not conflict or obstruct implementation of the

48 District's air quality plan."

1

2 Construction

3 Air quality emissions would be below significance thresholds for all criteria pollutants, as described in

4 Section 5.3, "Air Quality," for significance criteria (a), (b), and (c). Construction of the proposed project

5 therefore would not make a cumulatively considerable contribution to any significant air quality impact at

6 the basin level (significance criteria (a), (b), and (c)).7

8 **Operation and Maintenance**

9 There would be no increase in criteria pollutant emissions during operation and maintenance, as future

10 operation and maintenance activities would be comparable to the existing activities, and the proposed

11 project would be unstaffed, with no new permanent employees. Therefore, the proposed project would not

12 contribute to a cumulative air quality impact (significance criteria (a), (b), and (c)) during operation and

13 maintenance.14

15 Biological Resources

16 The list approach was used for the biological resources cumulative analysis. The habitat in the

surrounding area is highly homogenous, and the project area is limited in reach such that impacts are

18 expected to be somewhat localized. The geographic scope of cumulative impacts on biological resources

19 is 2 miles due to the largely homogenous agricultural surroundings. Therefore, there is abundant similar

20 agricultural habitat in the vicinity. Furthermore, the impacts of the proposed project are minimal and not

21 expected to result in impacts to sufficient wildlife individuals to have widespread effects. The Royal

Woods Subdivision, an agricultural market project, and rezoning projects are located within 2 miles of the proposed project.

23 24

25 The proposed project would not impact any riparian habitat or sensitive natural communities; it would not

26 contribute to a cumulative impact to sensitive natural communities (significance criterion (b)). The

27 proposed project would not impact any federally or state projected wetlands; it would therefore not

28 contribute a cumulative impact to wetlands (significance criterion (c)). The proposed project would not 29 interfere with wildlife movement or migration; it would therefore not contribute to a cumulative impact to

wildlife movement or migration; it would therefore not contribute to a cumulative impact to wildlife movement or migration (significance criterion (d)). The proposed project would not conflict with

30 wildlife movement or migration (significance criterion (d)). The proposed project would not conflict with 31 local biological resources protection policies or the provisions of an adopted Habitat Conservation Plan,

Natural Community Conservation Plan, or other such plan; it would therefore not contribute to any

33 cumulative impact related to conflict with a biological resources protection plan (significance criteria (e)

34 and (f)). Significance criteria (b), (c), (d), (e), and (f) are therefore not further discussed.

35

36 Construction

There is a moderate potential for one special status species— Swainson's hawk—to occur in the area, and low potential for burrowing owl, loggerhead shrike, pallid bat, San Joaquin kit fox, western red bat, and

39 white-tailed kite. Land impacted by the proposed project is primarily agricultural. Nearly half of Fresno

40 County's land is involved in agricultural operations (Fresno County Farm Bureau n.d.), and the majority

41 of land within 2 miles of Sanger Substation is agricultural land. As a result, potential habitat for the

42 special status species in the project area is representative of potential habitat near and at the site of the

43 proposed project. The Royal Woods Subdivision project has already been graded, and the agricultural

market project site is already disturbed (Google Earth 2015). The rezoning project area currently contains
 vineyards (Google Earth 2015). This means there is little to no habitat at the cumulative project sites for

45 vineyards (Google Earth 2013). This means there is intre to no habitat at the cumulative project sites for 46 special status species, though the sites may be used for foraging by the same species and individuals as

40 special status species, mough the sites may be used for foraging by the same species and individuals as 47 the proposed project site. Royal Woods Subdivision, the agricultural market project, and the eventual

47 the proposed project site. Royal woods Subdivision, the agricultural market project, and the eventual 48 development on the rezoned area may result in minimal impacts to special status species. On its own, the

49 proposed project would result in a potentially significant impacts to Special status species. On its own, th

- 1 loggerhead shrike. San Joaquin kit fox, and white-tailed kite. Other projects may have similar impacts on
- 2 these species from vegetation removal and grading, which means the impact would be cumulatively
- 3 significant. All of the proposed project's significant impacts would be reduced to less than significant
- 4 with implementation of APM BIO-9 (mitigates potential for pets to kill San Joaquin kit foxes), APM
- 5 BIO-11 (mitigates potential for San Joaquin kit fox to be entrapped in excavations), MM BIO-1 (worker
- 6 training to reduce impacts to special status species), MM BIO-2 (mitigation of impacts of special status
- 7 species through avoidance), MM BIO-3 (mitigation of impacts to special status species through
- 8 monitoring), MM BIO-4 (mitigates impacts to nesting birds), MM BIO-5 (mitigates construction impacts
- 9 to wildlife in general), MM BIO-6 (mitigates impacts to burrowing owl), and MM BIO-7 (mitigates
- 10 impacts to special status raptors). The proposed project's contribution to the significant cumulative impact
- 11 (significance criterion (a)) would not be cumulatively considerable after mitigation.
- 12

13 **Operation and Maintenance**

- 14 With the proposed expansion, Sanger Substation would continue to be operated remotely. Power line
- 15 inspections would not change from those on the existing lines and new structures, including the expanded
- 16 substation and transmission lines. The proposed project would not contribute to a cumulative biological
- 17 resources impact during operation and maintenance.
- 18

19 Cultural Resources

- 20 Cultural and paleontological resources impacts are highly localized in that they impact resources in
- 21 discrete areas; therefore, the cumulative cultural resources analysis uses the list approach. The geographic
- 22 scope of cumulative impacts to cultural and paleontological resources would include all ground-disturbing
- 23 projects within 100 feet of the proposed project that could impact known or undiscovered cultural
- 24 resources. The geographic scope is limited because cultural resources are discrete and typically not very
- 25 large, such that two projects must be very close to impact the same resource. None of the cumulative
- projects are located within 100 feet of the proposed project. Therefore, the proposed project would not 26
- 27 contribute to a cumulative impact to cultural and paleontological resources (significance criteria (a), (b), 28 (c), and (d)).
- 29

30 Geology and Soils

- 31 Geology and soils impacts are project-specific and highly localized; therefore, the cumulative geology 32 and soils analysis uses the list approach. The geographic scope of cumulative impacts would include 33
- projects in the immediate vicinity of the proposed projects; for geology and soils impacts of different
- 34 projects to accumulate, the projects must be close together so that impacts combine in the same location. 35 All of the cumulative projects are located 1.5 miles or more from the proposed project. Therefore, the
- 36 proposed project would not contribute to a cumulative impact to geology and soils (significance criteria 37 (a), (b), (c), (d), and (e)).
- 38

39 Greenhouse Gases

- 40 The CEOA Guidelines address how a lead agency can assess cumulative impacts of projects that emit 41 greenhouse gases (GHGs) (CEQA Guidelines Section 15064(h)(3)):
- 42
- 43 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 44
- plan or mitigation program (including, but not limited to ... regulations for the reduction of 45
- 46 greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen
- 47 the cumulative problem within the geographic area in which the project is located.
- 48

1 For this analysis, compliance with state-level policies is used to assess cumulative impacts, given that a

2 substantial amount of GHG reduction programs and policies are undertaken or spearheaded at the state

- 3 level. The cumulative scenario includes all GHG emission sources in California, which includes sources
- 4 such as transportation, manufacturing, energy production, and agriculture.
- 5

6 **Construction and Operation**

7 Regional and global development patterns continue to rely on methods and practices that contribute large 8 volumes of GHGs to the atmosphere, and impacts related to GHGs have widespread and potentially 9 harmful consequences. The increase in GHGs in the atmosphere, caused in large part by human activity, 10 is now considered one of the key causes of global climate change. Current scientific research indicates that potential effects of climate change include variations in temperature and precipitation, sea-level rise, 11 12 impacts on biodiversity and habitat, impacts on agriculture and forestry, and human health and social 13 impacts. As described in the state's Climate Change Scoping Plan of 2014 (CARB 2014), GHG sources 14 in the state collectively result in emissions that are higher than the targets established by Assembly Bill 15 32, which indicates that GHG emissions in the state continue to contribute to a total significant state-wide 16 cumulative impact.

17

18 The proposed project would contribute to a cumulative GHG impact because it would result in emission

19 of GHGs. During construction, emissions would be generated by equipment/vehicle usage. During

20 operation, emissions would be generated by equipment/vehicle usage and through sulfur hexafluoride

- 21 (SF_6) leakage from circuit breakers.
- 22

23 The proposed project would comply with regulations related to reduction of GHG emissions from heavy-

24 duty trucks during construction, including the Low Carbon Fuel Standard and, if applicable, "Phase 2"

25 heavy-duty truck GHG standards and other standards and regulations adopted over time. Compliance with

these standards is discussed in greater detail in Section 5.7, "Greenhouse Gases." The proposed project's

contribution to the cumulative significant impact would therefore not be cumulatively considerable.

29 Hazards and Hazardous Materials

30 The cumulative hazards and hazardous materials analysis uses the list approach for hazardous materials

31 impacts because the impacts are project-specific and highly localized. The geographic scope of

32 cumulative impacts for hazardous materials and hazards, including wildfire, would be the area within 100

feet of the proposed project disturbance areas. The limited geographic scope is due to the fact that there is

34 low risk for a hazardous material spill or release as a result of the proposed project. Furthermore, any

release would not travel far due to the types of materials involved in construction. The greatest risk would be spillage of gasoline, diesel fuel, oil, or lubricants during construction. In the event of an accident, none

of these substances are expected to be released in large quantities or to travel long distances. Furthermore,

a wildfire would be limited geographically by roadways among the agricultural fields. None of the

cumulative projects are located within 100 feet of the proposed project. Therefore, the proposed project

40 would not contribute to a cumulative impact involving hazards and hazardous materials (significance

41 criteria (a), (b), (c), (d), (e), (f), (g), (h)).

42

43 Hydrology and Water Quality

44 The cumulative hydrology and water quality analysis uses both the list approach and the projection

45 approach, depending on the impact. Certain hydrology and water quality impacts are project-specific and

46 highly localized, including water quality, drainage impacts, and runoff. Some impacts, however, are

47 basin- or countywide, such as groundwater supply, making the projection approach most appropriate to

48 evaluate cumulative impacts. The geographic scope of cumulative impacts for hydrology and water

49 quality is dependent on the impact. Impacts related to groundwater supply and water quality are regional

- 1 scope is within 0.25 miles of the proposed project because this area encompasses the nearest drainages
- 2 where local impacts to hydrology and water quality could combine. There are no projects located within
- 3 0.25 miles of the proposed project, so there would be no cumulative impacts related to drainage alteration
- 4 (significance criteria (c) and (d), and (e)). Significance criteria (c), (d), and (e) as they relate to
- 5 stormwater drainage are therefore not discussed further.
- 6
- 7 The proposed project would not result in impacts related to 100-year floods, seiches, tsunamis, or
- 8 mudflows. The proposed project therefore would not contribute to a cumulative impact related to 100-
- 9 year floods, seiches, tsunamis, or mudflows (significance criteria (g), (h), and (j)). The proposed project
- 10 would not affect groundwater recharge and would therefore not contribute to a cumulative impact to 11 groundwater recharge (significance criterion (b)). Construction of Sanger Substation would require 1
- million gallons of water sourced from the City of Sanger, City of Fowler, and Sunnyside Farm (which
- 13 owns the expansion parcel); operation would not use groundwater. Since construction and operation
- 14 would represent a net reduction of groundwater use at the parcel, the proposed project would not
- 15 contribute to cumulative adverse impacts to groundwater supply (significance criterion (b)). Significance
- 16 criterion (b) is therefore not discussed further.
- 17

18 Construction

- 19 The proposed project and the projects identified in Table 5.18-2 would be required to adhere to applicable
- 20 water quality regulations at the local, state, and federal levels. Likewise, all projects would be required to
- 21 comply with applicable permitting requirements such as a Construction Activities Storm Water General
- 22 Permit (Order 99-08-DWQ) for storm water discharges associated with construction activities. For any
- 23 projects that would disturb more than 1 acre, a Stormwater Pollution Prevention Plan would also be
- required, which would mandate implementation of best management practices prior to construction, such
- as fiber rolls, silt fence, and mulch. Projects would also need to comply with applicable hazardous
 materials regulations to prevent spills. With compliance with existing regulations, cumulative impacts to
- water quality from sedimentation and hazardous materials spills (significance criteria (a), (e), and (f))
- 27 water quality from sedimentation 2 28 would not be significant.
- 29

30 Catastrophic failure of the Pine Flat Dam would cause inundation of a large and populated area of

- 31 southern Fresno County, which would result in a significant impact. The proposed project would
- 32 temporarily place workers within the inundation area, contributing to the significant impact (significance
- 33 criterion (i)) in the event of dam failure. Given that the area would eventually drain, that water would be
- 34 only 2 feet deep at the substation site, and that it is unlikely that dam failure will occur during the
- 35 construction period, the proposed project's contribution to the significant impact would not be
- 36 cumulatively considerable.
- 37

38 Operation and Maintenance

- 39 Operation of the expanded substation would be appreciably the same as current operations with regard to
- 40 hazardous material use, and no additional ground disturbance would occur. No employees would be
- 41 located on site. Operation of the proposed project would therefore not contribute to a cumulative impact
- 42 to water quality from sedimentation and hazardous materials spills (significance criteria (a), (e), and (f).
- 43 Operation also would not contribute to a cumulative impact related to dam failure (i).
- 44

45 Noise and Vibration

- 46 Noise and vibration impacts are highly localized; therefore, the cumulative noise and vibration analysis
- 47 uses the list approach. The geographic scope for cumulative noise impacts is the area in which noise from
- the proposed project could combine with noise from cumulative projects to affect a sensitive receptor. For
- the loudest projects (i.e., those that could generate noise at 90 A-weighted decibels (dBA) at 50 feet from
- 50 the noise source during Phase 5, which is the loudest phase of construction) and given attenuation of

- 1 noise over distance, the geographic scope is presumed to be about 0.6 miles, where noise would attenuate
- 2 to under 54 dBA due to distance. It is likely that noise would be even further reduced due to intervening
- 3 structures and vegetation. With this additional attenuation, noise at this distance would fade into ambient
- 4 background noise (see Table 5.12-2). For vibration, the scope is even smaller due to the rapid attenuation
- 5 of vibration over distance; the most intensive activities associated with proposed project construction
- 6 would not be perceptible beyond about 36 feet (Amick and Gendreau 2000). Projects identified in Table
- 5.18-2 are more than 0.6 miles from Sanger Substation, such that noise and vibration from the proposed
 project would not combine with noise or vibration from another project to affect a sensitive noise
- 9 receptor. Therefore, there would be no cumulative noise or vibration impact (significance criteria (a), (b),
- (c), and (d)). Furthermore, the proposed project would not be located within an airport land use plan or in
- 11 the vicinity of a private airstrip and would therefore not contribute to related cumulative impacts
- 12 (significance criteria (e) and (f)).
- 13

14 **Population and Housing**

- 15 The projection approach was used to analyze the proposed project's cumulative impact on population and
- 16 housing. Because population growth occurs at a city, county, and regional level, a project list approach
- 17 would not adequately represent the cumulative scenario. Therefore, a summary of projections approach
- 18 was used to evaluate potential cumulative impacts. The cumulative scenario covers Fresno County, based 19 on the assumption that projected population growth across the county would take into account the average
- 19 on the assumption that projected population growth across the county would take into account the average 20 growth of cities to which workers may relocate if they are working on the proposed project or any of the
- 20 growth of cities to which workers may relocate if they are working on the proposed project or any of the 21 cumulative projects. The proposed project would not displace existing housing or people; it would not
- contribute to related cumulative impacts (significance criteria (b) and (c)); therefore, significance criteria
- 23 (b) and (c) are not further discussed.

2425 Construction

- 26 Caltrans forecasts that the population in Fresno County will grow approximately 1.2 percent from 2015 to
- 27 2020 (Caltrans 2016). Construction of 1.2 percent more housing could result in a significant cumulative
- 28 environmental impact depending on the location and timing of construction. However, the proposed
- 29 project's construction would not make a cumulatively considerable contribution to this impact because,
- 30 while unlikely, even if 30 construction workers relocated to the project area, vacancy rates near 8.3
- 31 percent for the County of Fresno indicate existing housing could accommodate temporary population
- 32 growth. Construction of the proposed project would not make a cumulatively considerable contribution to
- 33 the cumulative impact (significance criterion (a)).
- 34

35 **Operation and Maintenance**

- 36 Operation and maintenance of the proposed project would have no impact on population and housing,
- 37 given that the substation would be unstaffed. The proposed project therefore would not contribute to a
- 38 cumulative population growth impact (significance criterion (a)).
- 39

40 Recreation

- 41 The projection approach was used to analyze the proposed project's cumulative impact on recreation
- 42 facilities. Population growth affects use of recreational facilities. Because population growth occurs at a
- 43 city, county, and regional level, a project list approach would not adequately represent the cumulative
- 44 scenario. Therefore, a summary of projections approach was used to evaluate potential cumulative
- 45 impacts. The proposed project would not include recreational facilities and would not contribute to
- 46 cumulative impacts related to construction of recreational facilities (significance criterion (b)).
- 47 Significance criterion (b) is therefore not further discussed.

48

1 Construction

- 2 Caltrans forecasts that the population in Fresno County will grow approximately 1.2 percent from 2015 to
- 3 2020 (Caltrans 2016), which would equate to about 12,000 people. The addition of 12,000 people to the
- 4 county's population could result in significant degradation of recreational facilities. However, the
- 5 proposed project's construction would not make a cumulatively considerable contribution to this impact
- 6 because, while unlikely, even if 30 construction workers relocated to the project area, this addition to the
- 7 population would be miniscule compared to projected growth in the County.
- 8

9 **Operation and Maintenance**

- 10 Operation and maintenance of the proposed project would have no impact on population, since the
- substation would be unstaffed, and thus no impact on degradation of recreational facilities, and would not contribute to a cumulative recreation impact (significance criterion (a)).
- 13

14 Transportation and Traffic

- 15 The impacts to traffic from the proposed project would be most concentrated near Sanger Substation;
- 16 therefore, the list approach is most appropriate to analyze cumulative impacts to traffic and transportation.
- 18 The geographic scope of cumulative impacts for transportation and traffic includes projects that would
- result in impacts to roads that would be used for the proposed project's construction. Traffic associated
- 20 with the Vita Pakt expansion project could use South McCall Avenue to access the site from State Route
- 21 (SR) 180. Construction and buildout traffic of the Royal Woods Subdivision could use East Jensen
- Avenue and South McCall Avenue to access the site from the west. The agricultural market traffic would
- 23 mainly come from adjacent SR-180 but could also come from South McCall Avenue.
- 24
- The proposed project would not contribute to a change in air traffic patterns; therefore, there would be no
- cumulative air traffic impact (significance criterion (c)). The proposed project would not affect parking
- and therefore would not contribute to a cumulative parking impact (significance criterion (g)).
- 28 Significance criteria (c) and (g) are therefore not further discussed.

29

30 Construction

- 31 Construction of Sanger Substation would result in a temporary impact on roadways, including those
- 32 subject to the Fresno County Congestion Management Program (South McCall Avenue and East Jensen
- Avenue). The other proposed projects listed in Table 5.18-2 could result in traffic impacts on the same
- roadways, as construction periods could potentially overlap with the Sanger Substation construction
 period.
- 36 J
- 37 However, the agricultural center and the Vita Pakt project are in the planning stages, such that traffic
- volume analysis would be speculative at this stage. Likewise, the rezoning project does not specify what
- kinds of stores or other commercial uses would be located on the rezoned parcel, which means that traffic
- 40 volume impacts analysis would be speculative as well. The Royal Woods subdivision is located
- 41 approximately 1.2 miles east of Sanger Substation off of East Jensen Avenue, and construction of homes
- 42 is expected to overlap with expansion of Sanger Substation. Roads that could be impacted by construction
- 43 traffic from the proposed project and the Royal Woods subdivision include SR-180, South McCall
- 44 Avenue, and East Jensen Avenue. Traffic associated with the subdivision project would include vehicle
- 45 and truck trips by workers, material delivery, and heavy equipment delivery. If many homes are
- 46 constructed at once, construction may generate a substantial amount of traffic on these roadways and
- 47 combine with traffic from the proposed project.

48

1 Delays from lane closure due to line stringing across South McCall and East Jensen Avenues could result 2 in a significant cumulative impact to circulation in combination with traffic associated with Royal Woods 3 construction. The proposed project itself would generate a maximum of 200 passenger car equivalent trips 4 per day. In combination with traffic from Royal Woods construction, it is unlikely that the level of service 5 (LOS) would degrade below acceptable given the current adequate operating LOS of most affected roads 6 (South McCall Avenue, East Jensen Avenue, and SR-180; there would not be a cumulative significant 7 impact (significance criteria (a) and (b)) to LOS on these roads due to increases in traffic volume. For SR-8 168, where LOS is already level D, the addition of traffic from the proposed project and from Royal 9 Woods would be incremental compared to the total annual daily traffic on SR-168 (73,803). The 10 incremental addition of traffic from the proposed project would not result in a cumulative significant 11 impact (significance criteria (a) and (b)) to LOS on SR-168. The proposed project may result in truck 12 queuing on South McCall Avenue, which could result in delays to traffic traveling southbound on South McCall Avenue. The proposed project may also result in delay when lane closures are implemented for 13 14 stringing over South McCall Avenue and East Jensen Avenue. Traffic associated with the Royal Woods 15 Subdivision may contribute to the impact. This cumulative impact would be significant. The proposed 16 project's contribution would be cumulatively considerable because, on its own, the proposed project would result in a significant traffic impact. PG&E would be required to implement MM TRAN-1, which 17 18 would preclude project traffic from queuing on South McCall Avenue and reduce delays from lane 19 closure. With mitigation, the project's contribution to a cumulative impact (significance criteria (a) and 20 (b)) would not be cumulatively considerable.

21

Work in public roadways would likely not be required as part of any of the cumulative projects because they are contained within parcels and do not have components over roadways. Therefore, there would be

no cumulative safety impact due to work in public roadways. The cumulative projects are also located far

25 enough away from the proposed project that there would be no cumulative impact from slow truck egress.

Heavy truck traffic from any of the cumulative projects could cause pavement damage similar to that

associated with the proposed project. If damage occurs to the same roads, safety impacts could be

significant. The proposed project on its own may result in a significant safety impact due to damage,
 which would be a cumulatively considerable contribution to the cumulative impact. PG&E would repair

which would be a cumulatively considerable contribution to the cumulative impact. PG&E would repair all damaged roadways per MM TRAN-1. After mitigation, the proposed project's contribution to the

31 cumulative impact (significance criterion (d)) would not be cumulatively considerable.

32

While the proposed project may affect emergency access and public transit through lane closures, the cumulative projects likely would not require lane closure because they are home construction and

commercial buildings that will be contained within parcels and do not have components over roadways.

Thus, there would be no cumulative emergency access impact (significance criterion (e)) or public transit

36 Thus, there would be no cumulative emergency access impact (significance criterion (e)) or public transi 37 impact (significance criterion (f)).

37 im 38

39 Operation and Maintenance

40 Sanger Substation would continue to be operated remotely. Power line inspections would not change from

41 those on the existing lines and new structures. Therefore, the proposed project's operation and

42 maintenance would not contribute to a significant cumulative impact to traffic and transportation.

43

44 Utilities and Service Systems

45 The projection approach was used to analyze the cumulative impact to utilities because utilities are

46 provided at the city and county levels. The geographic scope of cumulative impacts on utilities and

- 47 service systems includes water district boundaries and landfill service areas that overlap with the
- 48 proposed project area or that the project area would use. The City of Sanger may provide water proposed
- 49 project construction. The landfill closest to the project area is the City of Clovis Landfill, located at 15679
- 50 Auberry Road in Fresno, California, approximately 15.3 miles northwest of the substation expansion area.

- 1 The second closest active landfill, the American Avenue Disposal Site, is located approximately 29.2
- 2 miles southwest of the substation expansion area.
- 3

4 Projects would presumptively comply with wastewater treatment requirements of the Central Valley

5 Regional Water Quality Control Board, such that there would be no related cumulative significant impact

- 6 (significance criterion (a)). The proposed project would not require or result in construction of new water
- 7 or wastewater facilities or require the expansion of existing facilities, and thus it would not contribute to a
- 8 significant impact (significance criterion (b)). The proposed project would have no impact related to
- 9 noncompliance with federal, state, and local statutes and regulations related to solid waste disposal and

10 therefore would not contribute to a significant impact (significance criterion (g)). Significance criteria (a),

- 11 (b), and (g) are therefore not further discussed.
- 12

13 Construction

14 The Fresno County General Plan notes a significant impact from construction of new stormwater drainage

15 facilities over time due to growth (Fresno County 2000). However, the proposed project's stormwater

drainage facilities are self-contained and therefore do not contribute to those impacts. The proposed 16

17 project would not contribute to a cumulative significant stormwater drainage impact (significance

- 18 criterion (c)).
- 19

20 Construction of the proposed project would require approximately 1 million gallons of water. All water

21 used would be trucked in from an outside source(s) in the project vicinity, which could include the City of

22 Sanger, City of Fowler, or Sunnyside Farms (current owner of substation expansion area).

23

24 The City of Sanger is capable of producing 4.7 billion gallons of water per year from eight wells, and the 25 current demand is 1.7 billion gallons of water per year (City of Sanger 2016a). The City of Fowler is

26 capable of producing approximately 3.1 billion gallons of water per year and pumped 551,500 million

gallons of water in 2015 (Weisser 2016). As described in Section 5.17, "Utilities and Service Systems,"

27

28 neither the City of Sanger nor the City of Fowler has a limit to the amount of water they may pump. 29

Across the county, projected growth-related demand on water supply that would require additional 30 facilities for water treatment has been identified as a significant cumulative impact (Fresno County 2000).

31 The proposed project would utilize water and would therefore contribute to the significant cumulative

- 32 impact. The proposed project would utilize water during the construction period, which would be
- 33 temporary and for only 24 to 30 months. It would not cause the need for new entitlements during the
- 34 temporary construction period, and then water use would cease. The proposed project therefore would not
- 35 make a cumulatively considerable contribution to this significant impact (significance criterion (d)) if
- 36 water from the City of Sanger or City of Fowler is used.
- 37

38 If Sunnyside Farms water is used, water use on the parcel would decrease during construction when

39 compared to baseline. Given that the current demand is 5.9 million gallons per year on the expansion area

40 for eggplant crops, and the proposed project's need is 1 million gallons over 24 to 30 months, there would

41 be a decrease in water need at the substation expansion parcel if the Sunnyside Farms water supply is

42 used. In this case, construction of the proposed project would not contribute to a cumulative water supply

- 43 impact (significance criterion (d)).
- 44

45 The Fresno County General Plan notes a significant impact from construction of new wastewater facilities

46 over time due to growth (Fresno County 2000). Wastewater would be generated during construction of

47 Sanger Substation, but this impact would be temporary and would not be due to growth. Construction of

- 48 the proposed project therefore would not contribute to a significant impact (significance criterion (e)).
- 49

50 Construction of Sanger Substation would generate solid waste from demolition and installation of new

51 infrastructure installation of new steel tubular poles. The waste would be disposed of within the County. The County General Plan EIR (Fresno County 2000) finds that there is adequate capacity at the county level in existing landfills to serve future needs under the General Plan, which includes projects such as the proposed project. The cumulative impact related to solid waste disposal (significance criterion (f)) would

4 therefore be less than significant.

5

6 **Operation and Maintenance**

7 The expanded Sanger Substation would be operated remotely and would have no new permanent water, 8 wastewater, or solid waste needs. No water would be used to operate or maintain the expanded substation; 9 therefore, the proposed project would not contribute to a cumulative water use impact. Therefore, the 10 proposed project's operation and maintenance would not contribute to a significant cumulative impact to 11 utilities and service systems (significance criteria (c), (d), (e), (f)).

12 13

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

14 15

16 The proposed project would not cause substantial adverse effects on human beings either directly or 17 indirectly. The proposed project would result in temporary impacts to human health during construction, 18 including changes to air quality, exposure to geologic hazards, and exposure to hazardous materials. As 19 discussed in Section 5.3, "Air Quality," air quality effects would be less than significant. As discussed in 20 Section 5.8, "Hazards and Hazardous Materials," hazards impacts would be less than significant with 21 implementation of APMs and mitigation measures, including preparation and implementation of a 22 Hazardous Materials Management Plan and implementation of an updated Spill Prevention Control and 23 Countermeasure Plan. As discussed in Section 5.6, "Geology and Soils," seismic impacts on workers 24 during construction would be less than significant, and the proposed project would not exacerbate existing 25 seismic conditions. Operation and maintenance activities would be comparable to current activities and no 26 additional impacts to human beings would occur.