# 6 Comparison of Alternatives

This Chapter presents the results of a comparative analysis of the CSP Project and its feasible Alternatives in terms of potential environmental impacts.

## 6.1 Alternatives Comparison

### 6.1.1 Comparison of Ability of Each Alternative to Avoid or Reduce a Potentially Significant Impact

As presented in Chapter 5, the CSP Project presents impacts that would be significant and unavoidable for the following CEQA impact criteria:

- Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15065.5?
- Would the Project disturb any human remains, including those interred outside of formal cemeteries?

As presented in Chapter 5, the CSP Project presents impacts that would be less than significant with mitigation for the following CEQA impact criteria:

- Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?
- Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
- Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
- Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, and coastal) through direct removal, filling, hydrological interruption, or other means?
- Would the Project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15065.5?
- Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Would the Project reduce or prevent access to a designated recreation facility or area?

As presented in Chapter 4, the following alternatives have been identified as feasible and thus carried through to this analysis:

- Highway 6 Route Alternative
- Rebuild Existing Single-Circuit Pole Lines Alternative

These alternatives are each potentially feasible, meet the underlying purpose of the CSP Project, and meet the basic project objective.

None of the alternatives would avoid or reduce a potentially significant impact. The relative effect for each of the CEQA impact criteria identified above for each of the feasible alternatives is discussed in the sections below.

#### *6.1.1.1 Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15065.5?*

##### 6.1.1.1.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts would be the same in the short-term; this is because some work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts in the long-term are unknown. The impacts would be more widespread, as the Alternative would be constructed and operated in a longer alignment than for the CSP Project.

##### 6.1.1.1.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts would be the same in the short-term; this is because work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

#### *6.1.1.2 Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

##### 6.1.1.2.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts would be the same in the short-term; this is because some work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts in the long-term are unknown. The impacts would be more widespread, as the Alternative would be constructed and operated in a longer alignment than for the CSP Project.

##### 6.1.1.2.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts would be the same in the short-term; this is because work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

#### *6.1.1.3 Cumulatively Considerable Net Increase of any Criteria Pollutant*

##### 6.1.1.3.1 Highway 6 Route Alternative

Compared with the CSP Project, the Highway 6 Route Alternative would likely result in greater emissions of criteria pollutants in the short-term; this is due to the greater scope of work included under the Alternative. Potential impacts would also be greater in the long-term; this is due to the longer linear length along which O&M-related activities would occur. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

##### 6.1.1.3.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, the Single-Circuit Pole Line Alternative would likely result in greater emissions of criteria pollutants in the short-term; this is due to the greater scope of work included under

the Alternative. Potential impacts would also be greater in the long-term; this is due to the greater number of structures that would be subject to O&M-related activities. Compared with the CSP Project, impacts would be no more widespread.

### *6.1.1.4 Species Identified as Candidate, Sensitive, or Special-Status*

#### 6.1.1.4.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts to candidate, sensitive, or special-status species would be greater in the short-term; this is due to the greater distance along which work would occur under the Alternative and the longer construction duration (and thus an increased spatial and temporal scope of the project). Potential impacts would also be greater in the long-term; this is due to the longer linear length along which O&M-related activities would occur. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

#### 6.1.1.4.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts to candidate, sensitive, or special-status species would be greater in the short-term; this is due to the increased scope of work under the Alternative and the longer construction duration. Potential impacts would also be greater in the long-term; this is due to the larger number of poles to be installed under the Alternative, and thus a concomitant increase in O&M-related actions. Compared with the CSP Project, impacts would be no more widespread; this is because the Alternative would be constructed and operated in the same locations as the CSP Project.

### *6.1.1.5 Riparian Habitat or Other Sensitive Natural Communities*

#### 6.1.1.5.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts to riparian and other sensitive natural communities would be greater in the short-term; this is due to the greater distance along which work would occur under the Alternative and thus the number of riparian communities and other sensitive natural communities that would be intersected by the Alternative alignment. Potential impacts would also be greater in the long-term; this is due to the longer linear length along which O&M-related activities would occur. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

#### 6.1.1.5.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts to riparian and other sensitive natural communities would be the same in the short-term; this is because work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities in riparian and other sensitive natural communities than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

### *6.1.1.6 State or Federally Protected Wetlands*

#### 6.1.1.6.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts to wetlands would be greater in the short-term; this is due to the greater distance along which work would occur under the Alternative and thus the length and area of wetlands that would be intersected by the Alternative alignment. Potential impacts would also be greater in the long-term; this is due to the longer linear length along which O&M-related activities would

occur. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

#### 6.1.1.6.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts to wetlands would be the same in the short-term; this is because work under the Alternative would occur in the same locations where work is planned under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities in wetlands than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

### *6.1.1.7 Archeological Resource*

#### 6.1.1.7.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts to archeological resources may be greater in the short-term due to the greater distance along which work would occur under the Alternative and thus the greater number of borings or excavations under the Alternative that may impact archeological resources. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities (including pole replacements that would require borings or excavations) than under the CSP Project. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

#### 6.1.1.7.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts to archeological resources would be equivalent in the short-term; this is because work locations under the Single-Circuit Pole Lines Alernative would be the same as the work locations under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities (including pole replacements that would require borings or excavations) than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

### *6.1.1.8 Paleontological Resource or Site*

#### 6.1.1.8.1 Highway 6 Route Alternative

Compared with the CSP Project, potential impacts to paleontological resources would be greater in the short-term; this is due to the greater distance along which work would occur under the Alternative and thus the greater number of borings or excavations under the Alternative. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities (including pole replacements that would require borings or excavations) than under the CSP Project. Compared with the CSP Project, impacts would be more widespread. This is due to the longer linear length of the Alternative.

#### 6.1.1.8.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential impacts to paleontological resources would be greater in the short-term; this is because a greater number of poles would be installed under the Alternative than under the CSP Project. Potential impacts would be greater in the long-term, as the Alternative would require more intensive O&M activities (including pole replacements that would require borings or excavations) than under the CSP Project. The impacts would be no more localized or widespread, as the Alternative would be constructed and operated in functionally the same location as the CSP Project.

### *6.1.1.9 Reduce or Prevent Access to Recreational Facilities*

#### 6.1.1.9.1 Highway 6 Route Alternative

Compared with the CSP Project, the reduction or prevention of access to recreational facilities would be equivalent in the short-term. Like for the CSP Project, during construction of the Highway 6 Route Alternative, portions or the entireties of Silver Canyon Road and Wyman Canyon Road will be either closed to non-project traffic or the direction of non-project traffic will be controlled. This will result in access to designated recreation facilities and areas being reduced (if the direction of traffic is controlled) or prevented (if that portion of the road that is the sole access to a given recreation facility is closed). Potential impacts would be eliminated in the long-term, as the Alternative proposes complete removal of CSP Project-related infrastructure in areas where recreational facilities (trails) are located.

#### 6.1.1.9.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, the reduction or prevention of access to recreational facilities would be equivalent in the short-term. Like for the CSP Project, during construction of the Alternative, portions or the entireties of Silver Canyon Road and Wyman Canyon Road will be either closed to non-project traffic or the direction of non-project traffic will be controlled. This will result in access to designated recreation facilities and areas being reduced (if the direction of traffic is controlled) or prevented (if that portion of the road that is the sole access to a given recreation facility is closed). Potential impacts would be equivalent in the long-term, as O&M activities would continue in areas with designated recreational facilities (trails).

### *6.1.1.10 Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan*

#### 6.1.1.10.1 Highway 6 Route Alternative

Compared with the CSP Project, potential physical interference with an evacuation route would be greater in the short-term; this is attributable to a greater linear length of work occurring under the Alternative adjacent to or over evacuation routes than would occur under the CSP Project. The potential physical interference with an evacuation route would be equivalent in the long-term, as O&M activities are infrequent and unlikely to interfere with an evacuation under either the CSP Project or the Alternative. The potential physical interference with an evacuation route would be more widespread due to the longer linear length of the Alternative.

#### 6.1.1.10.2 Rebuild Existing Single-Circuit Pole Lines Alternative

Compared with the CSP Project, potential physical interference with an evacuation route would be greater in the short-term and equivalent in the long-term, and the impacts would be no more localized or widespread. This is because the Alternative is proposed to be constructed and operated in functionally the same location as the CSP Project, and because construction of the Alternative would take longer than the CSP Project.

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## 6.2 Alternatives Ranking

Table 6.2-1 summarizes the comparison results discussed above. The proposed CSP Project is the environmentally superior project.

**Table 6.2-1. Alternatives Ranking**

| CEQA Impact Criterion | Proposed CSP Project | Highway 6 Route Alternative | Rebuild Existing Single-Circuit Pole Lines Alternative |
|---|---|---|---|
| Historical Resource | Impacts presented in Chapter 5 | • Short-term impacts same<br>• Long-term impacts unknown<br>• Impacts more widespread | • Short-term impacts same<br>• Long-term impacts greater<br>• Impacts more widespread |
| Human Remains | Impacts presented in Chapter 5 | • Short-term impacts same<br>• Long-term impacts unknown<br>• Impacts more widespread | • Short-term impacts same<br>• Long-term impacts greater<br>• Impacts more widespread |
| Criteria air pollutants | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts more widespread | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| Species identified as candidate, sensitive, or special-status | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts more widespread | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| Riparian habitat or other sensitive natural communities | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts more widespread | • Short-term impacts same<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| State or federally protected wetlands | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts more widespread | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| Archeological resource | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts more widespread | • Short-term impacts same<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| Paleontological resource or site | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts same<br>• Impacts more widespread | • Short-term impacts greater<br>• Long-term impacts greater<br>• Impacts no more localized or widespread |
| Reduce or prevent access to recreational facilities | Impacts presented in Chapter 5 | • Short-term impacts same<br>• Long-term impacts lesser<br>• Impacts no more localized or widespread | • Short-term impacts same<br>• Long-term impacts same<br>• Impacts no more localized or widespread |

**Table 6.2-1. Alternatives Ranking**

| CEQA Impact Criterion | Proposed CSP Project | Highway 6 Route Alternative | Rebuild Existing Single-Circuit Pole Lines Alternative |
|---|---|---|---|
| Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan | Impacts presented in Chapter 5 | • Short-term impacts greater<br>• Long-term impacts same<br>• Impacts more widespread | • Short-term impacts greater<br>• Long-term impacts same<br>• Impacts no more localized or widespread |

# 7 Cumulative and Other CEQA Considerations

This Chapter presents the results of a cumulative impacts analysis for the CSP Project, and an analysis of the potential growth-inducing impacts associated with the CSP Project.

## 7.1 Cumulative Impacts

This section analyzes the potential cumulative impacts related to the CSP Project.

The CEQA requires lead agencies to consider the cumulative impacts of proposals under their review. Section 15355 of the CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." According to Section 15130(a)(1), a cumulative impact "is the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." The cumulative impacts analysis "would examine reasonable, feasible options for mitigating or avoiding the Proposed Project's contribution to any significant cumulative effects" (Section 15130(b)(3)).

Section 15130(a)(3) also states that an environmental document may determine that a project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable, and thus 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, the proper frame of reference is the temporal span and spatial areas in which the CSP Project would cause impacts. In addition, a discussion of cumulative impacts must include either:

- a list of past, present, and probable future projects, including, if necessary, those outside the lead agency's control; or
- a summary of projections contained in an adopted general plan or related planning document, or in a previously certified EIR, which described or evaluated regional or area-wide conditions contributing to the cumulative impact, provided that such documents are referenced and made available for public inspection at a specified location (Section 15130(b)(1)).

The term "probable future projects" includes approved projects that have not yet been constructed; projects that are currently under construction; projects requiring an agency approval for an application that has been received at the time a Notice of Preparation (NOP) is released; and projects that have been budgeted, planned, or included as a later phase of a previously approved project (Section 15130(b)(1)(B)(2)). A listing of projects meeting these criteria within 2 miles of the CSP Project alignment are listed in Table 7.1-1: Cumulative Projects within 2 Miles, along with an identification number, a brief description, the jurisdiction in which it is located, distance from the CSP Project alignment, status, and anticipated construction schedule; these projects are shown on Figure 7.1-1.

The following subsections discuss whether—when combined with past, present, planned, and probable future projects in the area—the CSP Project could result in significant short-term or long-term environmental impacts. Short-term impacts are generally associated with construction of the CSP Project and cumulative projects, while long-term impacts are those that result from permanent CSP Project features or operation and maintenance of the cumulative projects. No material changes in operation and maintenance activities are anticipated with implementation of the CSP Project, and therefore with the exception of aesthetics, there would be no cumulative long-term impacts generated by the CSP Project.

### 7.1.1 List of Cumulative Projects

Review of the Mono County Planning Division's website and the Inyo County Planning Department's website revealed no past, present, or probable future projects that are located within two miles of the CSP Project alignment and that overlap temporally with the CSP Project. No portion of the CSP Project alignment is located within two miles of the City of Bishop's city boundary.

**Table 7.1-1: Cumulative Projects within 2 Miles**

| Project | Description | Location | Distance | Status | Anticipated Schedule |
|---|---|---|---|---|---|
| SCE-1: SCE Enhanced Overhead Inspection Program | Replacement of wood poles with lightweight steel poles in Segment 1. | Inyo County | 0 miles | Complete | 2019-2020 |
| SCE-2: SCE Control-Silver Peak 55 kV Reliability Project | Installation of remote fault indicators, packet routers, and installation of remote switches along with pole replacements. | Inyo County | 0 miles | Planning | 2021 |
| SCE-3: Zack 55/12 kV (D): HFRA RTU CB Relay Upgrades - (1) Total Relay | Install new relay at Zack Substation. | Mono County | 0 miles | Planning | 2021 |
| SCE-4: Zack 55/12 kV (D): Replace station battery (ZACK SWITCHER Battery) | Replace battery at Zack Substation. | Mono County | 0 miles | Planning | 2021 |
| SCE-5: Ivanpah-Control Project, Segment 1 | Rebuild existing SCE subtransmission line between Control and Inyokern substations. | Inyo County | 0 miles | Planning | 2024 |
| SCE-6: Deteriorated Pole Program | Replace approximately 380 deteriorated poles with new LWS poles, primarily along Segments 2 and 3. | Inyo County Mono County | 0 miles | Planning | 2021-2025 |
| BLM-1: Proposed Range Improvements in Deep Springs Valley and South Oasis Grazing Allotments | Construction, use, and maintenance of range improvement features. | Inyo County Mono County | 0 miles | In Progress - Comment and Review Period | Unknown |
| CT-1: Bishop Pavement | Roadway improvements. | Inyo County | On haul route | Environmental | 2023-2024 |
| CT-2: Bishop Maintenance Yard Expansion | Expand yard. | Inyo County | On haul route | Design | 2012-2022 |
| CT-3: D9 Lab | Construct laboratory. | Inyo County | On haul route | Environmental | 2024-2025 |
| CT-4: Inyo Digouts | Roadway improvements. | Inyo County | On haul route | Design | 2021 |
| CT-5: Ped Safety Project | Roadway improvements. | Inyo County | On haul route | Construction | 2020-2021 |
| CT-6: D9 End Treatments | Roadway improvements. | Inyo County | On haul route | Design | 2021 |
| CT-7: SR-168 Westgard Shoulder Project | Roadway improvements. | Inyo County | On haul route | Design | 2021 |
| CT-8: SR-266 Thin Blanket | Roadway improvements. | Mono County | On haul route | Design | 2021-2022 |

Sources: Caltrans District 9 Quarterly Report: https://caltrans.maps.arcgis.com/apps/opsdashboard/index.html#/67670a6e24ee42628f5a852c61b57abf
SCE
United States Forest Service. Forest Service Schedule of Proposed Actions for the Inyo National Forest. https://www.fs.fed.us/sopa/forest-level.php?110504

### 7.1.2 Geographic Scope

The geographic scope of analysis for each resource topic is constrained to those areas where work under the CSP Project would be performed or, for aesthetics, those areas where work under the CSP Project would be visible.

### 7.1.3 Cumulative Impact Analysis

#### *7.1.3.1 Aesthetics*

As discussed in Section 5.1, the CSP Project would have less than significant impacts under all Aesthetics criteria.

As presented in Section 5.1, the CSP Project would not substantially affect the existing visual character or quality of any scenic vista. The CSP Project would have a less than significant impact on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. Cumulative Projects SCE-1 and SCE-5 overlap or adjoin the CSP Project alignment in the immediate proximity of SR-168, a designated State Scenic Highway. In this area, the CSP Project would install only OPGW on poles to be installed under Cumulative Project SCE-1, and thus no change to scenic resources within this roadway corridor would occur and there would be no impact from the CSP Project alone. The work to be performed under Cumulative Project SCE-1 is akin to the work to be performed in Segment 2 under the CSP Project; as discussed in Section 5.1, this work would result in changes that are minor and incremental, and not expected to have a substantial effect on motorists' views from the eligible State Scenic Highway. Similarly, the work under Cumulative Project CSP 1-2 would be expected to have non-substantial effects on motorists' views. The work under Cumulative Project CSP 1-1 would occur within the existing Control Substation, and would not be particularly evident to motorists, or have a substantial effect on motorists' views. Therefore, no cumulatively considerable impact would result from the CSP Project and the Cumulative Projects.

The CSP Project would result in incremental permanent visual change that would not substantially alter or degrade the existing visual character in the area. Given the scopes of work under the Cumulative Projects, it is anticipated or has been analyzed that these projects too would result in only incremental permanent visual change. Further, the equipment and poles installed under Cumulative Project SCE-2 would be subsumed within the CSP Project, and the poles installed under Cumulative Project SCE-6 would either be subsumed within the CSP Project, or would be removed by the CSP Project when replacement poles at those locations are installed; therefore, there would be no significant cumulative impact. Work under Cumulative Projects SCE-3 and SCE-4 would occur within the existing Zack Substation; this work would result in minor modifications to a substation facility that already exists and is contained in the visual character of the area. None of the other Cumulative Projects would change the visual character of the area. Cumulative Projects SCE-1, -2, -5, -6 will occur or have occurred in the same viewshed as the CSP Project; the incremental permanent visual change resulting from each project would not result in a cumulatively considerable impact given the currently-impacted visual character of the areas.

Neither the CSP Project nor any of the Cumulative Projects would be a source of considerable glare and none would be a new source of light. Therefore, no cumulatively considerable impact would result.

#### *7.1.3.2 Agriculture and Forestry Resources*

As presented in Section 5.2, the CSP Project would result in no impacts for all agriculture-related CEQA criteria; therefore, the CSP Project would not contribute to any cumulatively considerable agriculture-related impact. None of the Cumulative Projects are anticipated to have any forestry-related impacts; therefore, the CSP Project's less-than-significant impact would not contribute to a cumulatively considerable impact.

### *7.1.3.3 Air Quality*

As presented in Section 5.3, the CSP Project would have no impact in terms of conflicting with or obstructing implementation of an applicable air quality plan, and thus would not contribute to any cumulatively considerable impact.

Emissions during the construction phase would include criteria air pollutants that could contribute to existing or projected violations of the ambient air quality standards for ozone and $PM_{10}$. These emissions would not contribute to a cumulatively considerable impact: with the exception of SCE-6, none of the identified Cumulative Projects would overlap the CSP Project's construction work in time. Under Cumulative Project SCE-6, only two poles are scheduled to be installed during the timeframe when the CSP Project would be under construction, and the nominal emissions associated with this work would not result in the CSP Project contributing to a cumulatively considerable impact.

The CSP Project will have less than significant impacts associated with other emissions such as those leading to objectionable odors and exposing sensitive receptors to substantial pollutant concentrations. None of the identified Cumulative Projects would overlap with the CSP Project's construction period or are in proximity to a potential receptor. Because odors and pollutant concentrations disperse rapidly with distance, and because none of the identified Cumulative Projects would overlap with the CSP Project's construction period or are in proximity to a potential receptor, the CSP Project would not contribute to any cumulatively considerable impact.

### *7.1.3.4 Biological Resources*

The geographical area evaluated for cumulative impacts on biological resources includes areas directly affected by construction as well as adjacent habitat potentially affected by construction activities. The geographical extent of the cumulative impact analysis also includes federal and state-regulated jurisdictional wetlands and other waters of the U.S.

Construction could affect plant, amphibian, reptilian, avian, and mammalian species identified as candidate, sensitive, or special-status species, and Cumulative Projects listed in Table 7.1-1 would have the potential for similar effects where those projects' activities occur in the presence or habitat of these species. Every construction area associated with Cumulative Project SCE-6 would overlap a construction area associated with the CSP Project; given the similarities in scope and because Cumulative Project SCE-6 would precede the CSP Project in time, these overlapped areas would be first impacted by Cumulative Project SCE-6. As discussed in Section 5.4, all impacts associated with the CSP Project would be reduced to a less-than-significant level with the implementation of APMs. Impacts to sensitive species and habitats during construction: (a) would be temporary and intermittent in nature (lasting only as long as construction work at a given site); and (b) would be limited in their potential geographic scope. In addition, with the exception of two poles to be installed under Cumulative Project SCE-6, none of the identified Cumulative Projects would overlap the CSP Project's construction work in time, and the Cumulative Projects would be expected to adhere to federal and state regulations promulgated for the protection of sensitive species. Therefore, no cumulatively considerable impact to sensitive species or their habitats would be anticipated.

As stated in Section 5.4, approximately 118.1 acres of sensitive natural communities would be temporarily impacted by the CSP Project. This 118.1-acre area of sensitive natural communities that would be impacted would not result in a significant contribution to any cumulative impact to these communities and would not reduce the overall availability of these habitats.

The CSP Project would result in both temporary and permanent impacts to wetlands. Compliance with applicable state and federal regulations (including Section 404 and 401 of the Clean Water Act) and compliance with applicable permit conditions would ensure that wetland impacts are less than significant. Cumulative Project SCE-6 could impact portions of the same wetlands that could be impacted under the CSP Project. Because of the physical overlap in potential impacts, SCE compliance with applicable regulations, and implementation of APMs, no cumulatively considerable impact to wetlands is anticipated.

No component of the CSP Project would result in permanent interference to the movement of any species. Construction activities would be temporary, transient, and would affect only small, geographically-dispersed areas at any one time; these construction activities would not interfere substantially with the movement of any migratory wildlife species, although construction activities may interfere with the movement of individual animals. The Cumulative Projects also would have localized footprints and would not be expected to affect species movement within the region. For example, no new highways, levees, or other major infrastructure is planned. Therefore, the CSP Project's contribution to any cumulatively considerable impact would not be cumulatively considerable and would be less than significant.

CSP Project construction and operation would not conflict with any local policies or ordinances protecting biological resources, including trees. Cumulative projects would be expected to comply with local policies, ordinances, and the conditions of applicable permits. Therefore, the CSP Project's contribution to any cumulatively considerable impact would not be cumulatively considerable and would be less than significant.

No Habitat Conservation Plans; Natural Community Conservation Plans; or other approved local, regional, or state habitat conservation plans exist for the CSP Project area. Therefore, the CSP Project would not contribute to a cumulatively considerable impact involving conflicts with adopted natural resource plans.

#### *7.1.3.5 Cultural Resources*

As presented in Section 5.5, 45 eligible, potentially eligible, or unevaluated resources (13 prehistoric, 6 historic, 2 multicomponent, the prehistoric components of 9 multicomponent sites, and 15 historic-era built environment) overlap with the CSP Project (see Tables 5.5-1 and 5.5-2). Construction impacts to 13 resources are potentially significant and impacts to two resources will be significant and unavoidable.

Three of these resources (one multicomponent and two historic-era built environment), intersect with two of the Cumulative Projects, SCE-2 and SCE-3. The two historic-era built environment resources, Control-Silver Peak 'A' and 'C' transmission lines, overlap with both SCE-2 and SCE-3, though pole replacements under these projects are considered like-for-like replacements and impacts are not considered significant. However, the CSP Project's impacts to Control-Silver Peak 'A' and 'C' transmission lines would be significant and unavoidable and the Project's contribution to any cumulatively considerable impact would be significant and unavoidable.

CSP Project impacts to the multicomponent site, P-14-001384/H (CA-INY-1384/H), are potentially significant. These impacts, combined with the potential impacts from the construction of Cumulative Project SCE-2, would have a potentially significant cumulatively considerable impact.

#### *7.1.3.6 Energy*

As presented in Section 5.6, the CSP Project would result in no or less than significant impacts under all energy-related CEQA criteria. Construction of the Cumulative Projects would, like the CSP Project, consume energy resources during construction; the executors of the Cumulative Projects would, like SCE,

not waste, unnecessarily use, or inefficiently consume energy resources. Therefore, the CSP Project would not contribute to any cumulatively considerable impact.

#### *7.1.3.7 Geology and Soils*

The CSP Project would have no impact or a less than significant impact under all geology and soils-related criteria. Geological hazards are generally site-specific and depend on localized geologic and soil conditions, and impacts assessed under the CEQA criteria are highly localized. The only Cumulative Projects that overlap physically the CSP Project would be or have been performed by SCE. As for the CSP Project, SCE would comply with applicable laws, regulations, ordinances, and permits, and would implement BMPs and SWPPPs where applicable during construction of Cumulative Projects SCE-1, -2, and -6, and SCE would expect Caltrans to similarly comply during construction of their Cumulative Projects performed in the vicinity of the CSP Project alignment. Therefore, no cumulative impact would be realized under any of the Cumulative Projects, and the CSP Project's less than significant impacts would not be cumulatively considerable and would be less than significant.

#### *7.1.3.8 Greenhouse Gas Emissions*

The geographic scope for the analysis of greenhouse gas-related cumulative effects is the jurisdictional extent of the GBUAPCD. As presented in Section 5.8, CSP Project construction would result in emissions of GHGs from on-site construction equipment and off-site worker trips. Over the entire construction period of the CSP Project, approximately 10,215 $MTCO_2e$ would be emitted. GHG construction emissions from the CSP Project amortized over 30 years is approximately 340 $MTCO_2e$. The 340 $MTCO_2e$ emissions associated with CSP Project construction would be well below the 25,000 $MTCO_2e$ threshold of significance established by the EKAPCD, which is used as a proxy in the absence of a threshold established by the GBUAPCD. Therefore, the CSP Project would not generate, either directly or indirectly, GHG emissions that would have a significant impact on the environment. As a result, the CSP Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

As presented in Section 5.8, GHG emissions from construction of the CSP Project would fall well below the established numerical threshold of significance. Therefore, the CSP Project would not conflict with any applicable plan, policy, or regulation and would have no contribution to cumulative impacts resulting from any Cumulative Project's conflict with such plans, policies, or regulations.

#### *7.1.3.9 Hazards and Hazardous Materials*

The geographic scope for hazardous materials includes areas near CSP Project sites that could be affected by a release of hazardous materials, including schools within 0.25 miles. Impacts from such releases are usually site-specific and localized. The geographic scope also includes areas affected by the Cumulative Projects listed in Table 7.1-1 including downgradient air, water bodies, groundwater, and areas subject to wildland fire hazards. Materials delivery routes are also included to account for the potential impacts from a traffic accident-related spill.

The CSP Project would not be constructed on a site listed as a hazardous materials site pursuant to Section 65962.5; and thus would not contribute to any cumulative or significant hazard to the public or the environment from construction on such a site.

The CSP Project would be constructed within an airport land use plan area, and within the vicinity of, and within 2 miles of, a public airport, public use airport, or private airstrip; however, as identified in Section 5.9, no impacts would be associated with the CSP Project for the related impact criterion, and thus the

CSP Project would not contribute to any cumulatively considerable impact as no Cumulative Projects are identified to occur in this location.

The CSP Project would not interfere with an adopted emergency response plan or emergency evacuation plan, and therefore would not contribute to a cumulatively considerable impact.

CSP Project construction would result in less than significant impacts associated with the transport, use, disposal, or foreseeable upset of, or accidents involving, hazardous materials during construction. Cumulative Projects would be expected to implement BMPs and adhere to all applicable laws and regulations to reduce to less than significant the potential impacts from hazards, including impacts associated with emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. Therefore there would be no cumulatively considerable impacts related to the transport, use, disposal or upset involving hazardous materials.

The potential for igniting vegetation would be minimized through the measures presented in Section 5.9. The Cumulative Projects would be expected to implement similar measures. Therefore, construction of the CSP Project would have a less than significant impact to risk of loss, injury, or death involving wildland fires, and the CSP Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

#### *7.1.3.10 Hydrology and Water Quality*

The geographic context for the cumulative impacts associated with hydrology and water quality consists of the watersheds and groundwater basins presented in Section 5.10; all Cumulative Projects are located in the same watersheds and groundwater basins as the CSP Project.

The CSP Project is not located in a tsunami or seiche zone. The CSP Project and Cumulative Project SCE-6 would both be performed within the floodplain associated with the Owens River; this area could be inundated during flooding. In the unlikely event of flooding or threatened flooding, SCE construction crews working on either project would evacuate in accordance to established evacuation plans and routes. Therefore, construction equipment would not be subject to inundation, and there would be no cumulative impact.

SCE would not violate any water quality standards or waste discharge requirements during construction or operation of the CSP Project; the Cumulative Projects would also not be expected to violate any water quality standards or waste discharge requirements. The CSP Project would result in less than significant impacts related to the degradation of surface and ground water quality, and therefore would not contribute to a cumulatively considerable impact.

The CSP Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; the Cumulative Projects would also not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and thus no cumulatively considerable impact would occur.

Neither the CSP Project nor the Cumulative Projects would substantially alter the existing drainage pattern of the site or area, and thus no cumulatively considerable impact would occur.

SCE would implement measures as described in Section 3.5.11 to ensure no substantial erosion or siltation occurs on- or off-site; similar measures would be employed for the Cumulative Projects, and thus no cumulatively considerable impact would occur.

SCE would implement measures as described in Section 3.5.11 to ensure no substantial increase in the rate or amount of surface runoff occurs; similar measures would be employed for the Cumulative Projects, and thus no cumulatively considerable impact would occur.

The CSP Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and neither would the Cumulative Projects; therefore, no cumulatively considerable impact would occur.

Only less than significant impacts would be realized under the CSP Project, and similar less than significant impacts would be realized under the Cumulative Projects. Therefore, no cumulatively considerable hydrology and water quality-related impact would be realized.

#### *7.1.3.11 Land Use and Planning*

As presented in Section 5.11, the CSP Project would result in no impacts under the land use and planning-related CEQA criteria; therefore, the CSP Project would not contribute to any cumulatively considerable impact.

#### *7.1.3.12 Mineral Resources*

As presented in Section 5.12, the CSP Project would result in no impacts under all mineral resources-related CEQA criteria; therefore, the CSP Project would not contribute to a cumulatively considerable impact.

#### *7.1.3.13 Noise*

Noise and vibration impacts are localized such that the geographic area in which cumulative impacts may occur is limited to the immediate vicinity of construction activities. As presented in Section 5.13, the CSP Project would result in no impacts under all noise-related CEQA criteria; therefore, the CSP Project would not contribute to a cumulatively considerable impact.

#### *7.1.3.14 Population and Housing*

As presented in Section 5.14, the CSP Project would result in no impacts under the population and housing-related CEQA criteria; therefore, the CSP Project would not contribute to any cumulatively considerable impact.

#### *7.1.3.15 Public Services*

As presented in Section 5.15, the CSP Project would result in no impacts; therefore, the CSP Project would not contribute to a cumulatively considerable impact.

#### *7.1.3.16 Recreation*

As presented in Section 5.16, the CSP Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, would not include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, and would not damage recreational trails or facilities. Therefore, the CSP Project would not contribute to a cumulatively considerable impact under these criteria.

The CSP Project would have a less than significant impact on the character of a recreational area; with the exception of Cumulative Project SCE-6, none of the Cumulative Projects are located in this area. The poles installed under Cumulative Project SCE-6 would either be replaced under the CSP Project or subsumed into the CSP Project, and thus there would be no cumulative impact.

The CSP Project would have a less than significant impact after mitigation on the accessibility of designated recreational facilities or areas. Cumulative Project SCE-6 would occur in this same area, but earlier in time, and would have similar impacts to the CSP Project. SCE would employ similar impact reduction measures during Cumulative Project SCE-6 as it would for the CSP Project; further, during construction of Cumulative Project SCE-6, access to the large majority of trail-miles in the White Mountains will not be impacted. Therefore, with implementation of APMs, the CSP Project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable, and thus not significant.

#### *7.1.3.17 Transportation*

The geographic scope for cumulative transportation impacts includes the regional and local roadways that may be used to access the CSP Project or that could otherwise be impacted by construction of the CSP Project. The geographic scope also includes the bus routes and pedestrian and bike paths in the area.

Based on the number of daily vehicle trips generated during construction, and the implementation of APM TRA-1, the CSP Project would not create any inconsistency or conflict with an applicable plan, ordinance or policy that establishes measures of effectiveness, and therefore would not contribute to a cumulatively considerable impact in this regard.

Project construction would not change air traffic patterns or locations. SCE would implement FAA recommendations regarding the installation of marker balls, to the extent feasible. Helicopter operations would be conducted in accordance with FAA regulations per APM TRA-2. None of the Cumulative Projects would likely include any air transportation, and therefore the CSP Project would not result in cumulatively considerable impacts to air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

The CSP Project would not introduce incompatible uses or design features such as changes to public roads. Therefore, the CSP Project would not contribute to any cumulatively considerable impact involving hazards due to a design feature or incompatible uses.

The CSP Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and therefore would not contribute to any cumulatively considerable VMT-related impact.

In combination with the fact that construction activities would be of short duration and performed in remote and largely-uninhabited areas, implementation of traffic control measures per APM TRA-1 would ensure that the CSP Project does not result in inadequate emergency access, even considering the effects of Cumulative Projects that may occur at the same time. It is expected that traffic control measures would be implemented during construction of the Cumulative Projects where necessary and feasible. Therefore, the CSP Project would have no contribution to any cumulatively considerable impacts.

#### *7.1.3.18 Tribal Cultural Resources*

Formal consultation under AB52, which is required to determine the potential impacts to Tribal Cultural Resources, will be conducted by the CPUC, serving as the lead state agency.

#### *7.1.3.19 Utilities and Service Systems*

As presented in Section 5.19, the CSP Project would result in no impacts under all utilities and service systems-related CEQA criteria; therefore, the CSP Project would not contribute to any cumulative impact.

#### *7.1.3.20 Wildfire*

As presented in Section 5.20, the CSP Project would result in no or less than significant impacts under all wildfire-related CEQA criteria. None of the Cumulative Projects temporally overlap the CSP Project, and therefore the less than significant impacts in terms of impairing an adopted emergency response plan or emergency evacuation plan would not contribute to a cumulatively considerable impact.

The CSP Project and Cumulative Projects are not located in both geographic and temporal proximity to each other. Therefore the less than significant impacts of the CSP Project associated with downstream flooding or landslides as a result of runoff, post-fire slope stability, or drainage changes would not contribute to a cumulatively considerable impact.

## 7.2 Growth-Inducing Impacts

### 7.2.1 Growth-Inducing Impacts

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

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

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

An EIR must describe any growth-inducing impacts of a proposed project including "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (Pub. Res. Code § 21100(b)(5); CEQA Guidelines §§ 15126(d), 15126.2(d)). Examples of projects that are growth-inducing are the expansion of urban services into a previously unserved or under-served area, the creation or extension of transportation links, and the removal of major obstacles to growth. It is important to note that these direct forms of growth have secondary effects including expanding the size of local markets and attracting additional economic activity to the area.

Typically, the growth-inducing potential of a project will 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. Significant growth-inducing 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.

#### *7.2.1.1 Would the Project either directly or indirectly, foster economic or population growth or the construction of additional housing in the surrounding area?*

**No Impact.** As presented in Chapter 2, the fundamental objective of the CSP Project is to remediate identified discrepancies. The CSP Project would not induce economic growth, as it would not provide new electrical service or electrical service to areas that are currently unserved or underserved. In addition,

the CSP Project does not include any new infrastructure such as publicly accessible roads that could either directly or indirectly foster economic or population growth.

As presented in Section 5.14, Population and Housing, the CSP Project would not foster, either directly or indirectly, population growth in the area. SCE expects to utilize up to approximately 100 workers per day. The labor demands of the CSP Project would be met by existing SCE employees or by hiring specialty electrical transmission contractors. Given the small number of positions required for construction of the CSP Project and the short term of the construction period, no population growth would be fostered, either directly or indirectly, by the rebuilding of the subtransmission lines.

As further presented in Section 5.14, the CSP Project would not displace any existing housing or people, and thus would not foster, either directly or indirectly, the construction of additional housing. Therefore, no impacts would occur under this criterion.

#### *7.2.1.2 Would the Project remove obstacles to population growth?*

**No Impact.** Growth in Inyo County and Mono County is planned and regulated by applicable local general plans and planning and zoning ordinances. The provision of electricity is generally not considered an obstacle to growth nor does the availability of electrical capacity by itself normally ensure or encourage growth. Other factors such as economic conditions, land availability, population trends, availability of water supply or sewer services, and local planning policies have a more direct effect on growth. The CSP Project, which is proposed to remediate discrepancies on existing circuits, not to provide new electrical service, will not remove obstacles to population growth. The CSP Project is required to remediate existing infrastructure. As such, the project would not bring additional power into an area that is not currently served. Therefore, no impacts would occur under this criterion as a result of the CSP Project.

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

**No Impact.** As discussed in Section 5.14, Population and Housing, the CSP Project would not include the construction of housing, and would not trigger population growth that could result in the construction of any new or upgraded community facilities such as parks or libraries. In addition, the CSP Project would not build public roads that would provide new access to undeveloped or underdeveloped areas, or extend the need for public services to new areas. Therefore, the CSP Project would not require the construction of new community facilities that could cause significant environmental effects.

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

**No Impact.** As discussed herein, the CSP Project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

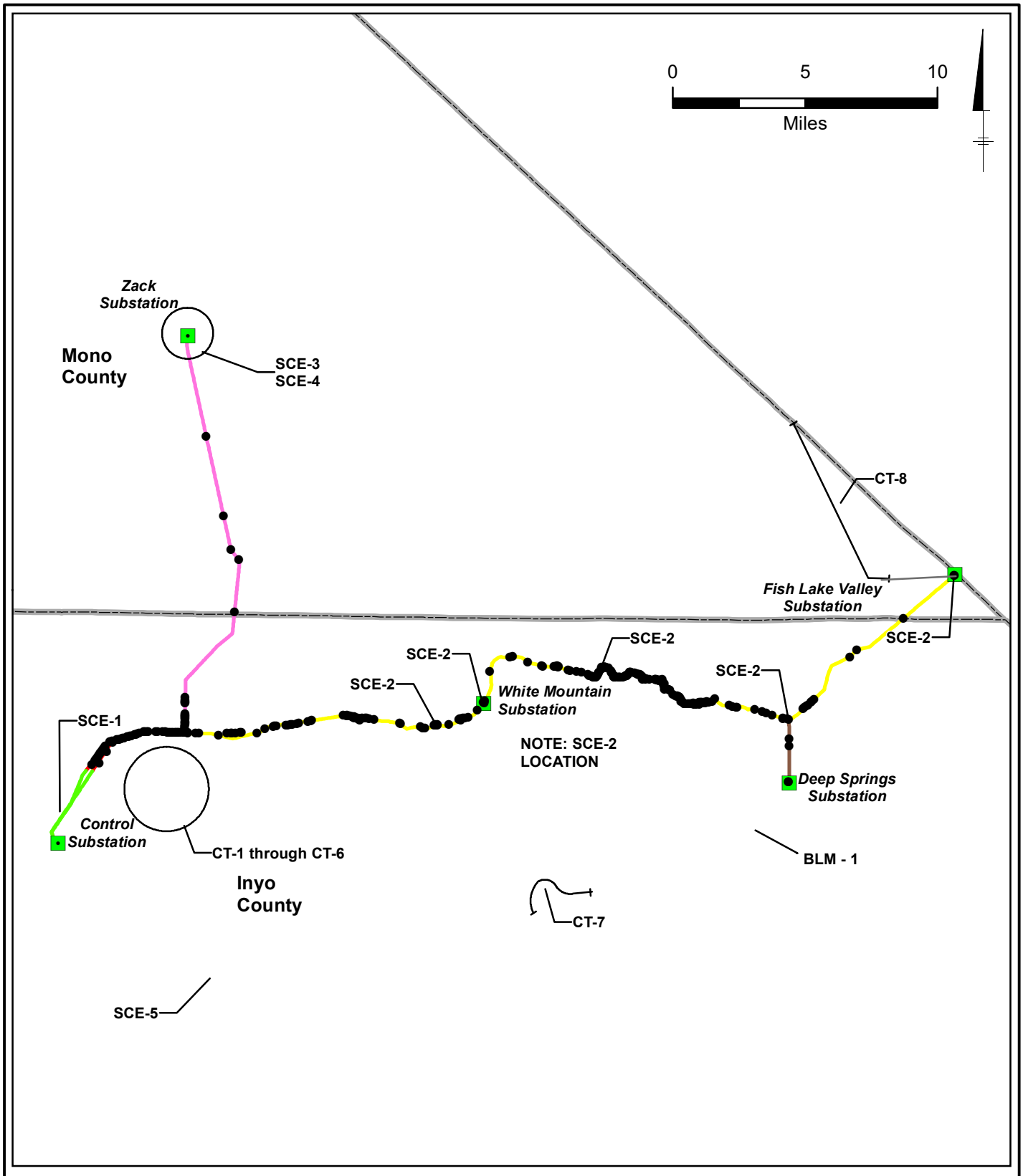
The CSP Project would not build new permanent access roads that would provide new access to undeveloped or underdeveloped areas.

Although the CSP Project would increase the reliability of electric transmission by replacing aging infrastructure with new infrastructure (which is likely less prone to failure), the CSP Project would not provide a new source of electricity that would encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Further, as presented in Chapter 2, resolving identified discrepancies to comply with standards contained in GO 95 is the driver for the Purpose and Need for the CSP Project, not future generation interconnections. As

stated in Section 3.2.2, only very limited increased capacity would be realized from the CSP Project, because any potential capacity increases to be realized from installation of new conductor would be constrained by existing substation equipment. Such constraints currently, and would continue, to inhibit future generation interconnections, and any potential growth and growth-related environmental effects.

Finally, other factors, most notably public policy and federal land management policies, would be most likely to influence whether additional activities would result in interconnections to any facility associated with the CSP Project.




## Legend

- Substation
- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Counties
- SCE-6 Deteriorated Poles

# CONTROL-SILVER PEAK PROJECT

## CUMULATIVE PROJECTS

[redacted]

FIGURE
**7.1-1**

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## 8.1 List of Preparers

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