

Chapter 21

Other Statutory Considerations

21.1 Introduction

This chapter presents discussions of significant and unavoidable impacts, growth-inducing impacts, and cumulative impacts as required by the California Environmental Quality Act (CEQA) Guidelines.

21.2 Significant and Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires an Environmental Impact Report (EIR) to describe any significant impacts that cannot be mitigated to a less-than-significant level. All of the impacts associated with the Proposed Project would be reduced to a less-than-significant level through the implementation of identified mitigation measures. The Proposed Project would not result in any significant and unavoidable impacts.

21.3 Growth Inducement

Section 15126.2(d) of the CEQA Guidelines requires an EIR to include a detailed statement of a proposed project's anticipated growth-inducing impacts. The analysis of growth-inducing impacts must discuss the ways in which a proposed project could foster economic or population growth or the construction of additional housing in the surrounding environment. The analysis must also address project-related actions that would remove existing obstacles to population growth, tax existing community service facilities and require construction of new facilities that cause significant environmental effects, or encourage or facilitate other activities that could, individually or cumulatively, significantly affect the environment. A project would be considered growth inducing if it induces growth directly (through the construction of new housing or increasing population) or indirectly (increasing employment opportunities or eliminating existing constraints on development). Under CEQA, growth is not assumed to be either beneficial or detrimental.

The Proposed Project would not involve new development or infrastructure installation that could directly induce significant population growth in the project area. Construction-related jobs would be short-term and would be anticipated to draw from the existing work force. The Proposed Project would not displace any existing housing units or persons, or create any housing units. Additionally, operation of the Proposed Project would not require any on-site workers as NextEra Energy Transmission West, LLC (NEET West) anticipates remotely operating the facility from its Lone Star control Center in Austin, Texas. Maintenance of the Proposed Project would likely include routine monthly inspections of the Static VAR compensator (SVC) equipment and inspections of the transmission line would occur every 6 to 8 months. This work would be conducted by a small crew of NEET West technicians (1 to 2 workers). The small amount of job growth associated with the Proposed Project's operation

1 is not anticipated to generate sufficient economic activity, such that it would result in
2 substantial population growth.

3 As described in Chapter 2, *Project Description*, the Proposed Project would increase
4 operational efficiencies by providing reactive support at the Suncrest Substation. With the
5 loss of a large producer of reactive power (i.e., the San Onofre Nuclear Generating Station
6 (SONGS)) and projected increases in renewable energy, the Proposed Project would ensure
7 that the transmission system reliably delivers new solar photovoltaic and other renewable
8 power generation from Imperial Valley to consumers in the San Diego and Los Angeles areas.
9 Although it is possible that the Proposed Project could remove an obstacle to growth (e.g.,
10 lack of reliable electric transmission) and contribute to secondary effects of growth, it would
11 be speculative to determine the extent to which the Proposed Project could result in growth
12 inducement in the San Diego and Los Angeles areas. Even if the Proposed Project did induce
13 growth indirectly or directly, any growth would be negligible. In conclusion, any growth
14 inducement that may be caused by the Proposed Project would not be substantial.

15 **21.4 Cumulative Impacts**

16 According to State CEQA Guidelines Section 15130(a)(1), a cumulative impact is created by
17 the combination of a proposed project with other past, present, and probable future projects
18 causing related impacts. Cumulative impacts can result from individually minor but
19 collectively significant projects taking place over a period of time (State CEQA Guidelines
20 Section 15355[b]). Under CEQA, an EIR must discuss the cumulative impacts of a project
21 when the project's incremental contribution to the group effect is "cumulatively
22 considerable." An EIR does not need to discuss cumulative impacts that do not result, in part,
23 from the project evaluated in the EIR. Where an incremental effect is not cumulatively
24 considerable, the basis for concluding that the incremental effect is not cumulatively
25 considerable must be described.

26 To meet the adequacy standard established by State CEQA Guidelines Section 15130, an
27 analysis of cumulative impacts must contain the following elements:

- 28 ▪ an analysis of related past, present, and reasonably foreseeable projects or planned
29 development that would affect resources in the project area similar to those affected
30 by the proposed project;
- 31 ▪ a summary of the environmental effects expected to result from those projects with
32 specific reference to additional information stating where that information is
33 available; and
- 34 ▪ a reasonable analysis of the combined (cumulative) impacts of the relevant projects.

35 **21.4.1 Approach to Analysis: List Approach**

36 The following analysis of cumulative impacts focuses on whether the impacts of each
37 alternative are cumulatively considerable within the context of impacts resulting from the
38 alternative and other past, present, or reasonably foreseeable future projects. The cumulative

1 impact scenario considers other projects proposed within the area defined for each resource
2 that have the potential to contribute cumulatively considerable impacts.

3 State CEQA Guidelines Section 15130 provides the following two alternative approaches for
4 analyzing and preparing an adequate discussion of significant cumulative impacts:

- 5 ▪ the list approach, which involves listing past, existing, and probable future projects
6 or activities that have or would produce related or cumulative impacts, including, if
7 necessary, those projects outside the control of the lead agency; or
- 8 ▪ the projection approach, which uses a summary of projections contained in an
9 adopted local, regional or statewide plan, or related planning document, that
10 describes or evaluates conditions and their contribution to the cumulative effect.

11 This Draft EIR uses the list approach for analyzing potential cumulative impacts. Activities
12 related to the Proposed Project that are included in the cumulative analysis were determined
13 using several factors, including the location and type of activity and the characteristics of the
14 activity related to resources with the potential to be affected by the Proposed Project. In
15 addition, regional or global conditions that might lead to cumulative impacts are also
16 described.

17 Resource Topics Considered and Dismissed

18 The Proposed Project has been determined to have the potential to make a considerable
19 contribution to cumulative impacts related to the following resource topics: Air Quality,
20 Biological Resources, Hazards and Hazardous Materials, Public Services and Utilities, and
21 Transportation and Traffic. Greenhouse gas emissions are a cumulative issue and are already
22 addressed in Chapter 10, *Greenhouse Gas Emissions*; therefore this topic is not discussed
23 further in this section. For all other resource topics, as shown in **Table 21-1**, either significant
24 cumulative impacts do not exist, or the Proposed Project would not have the potential to
25 make a considerable contribution to any significant cumulative impacts. These resource
26 topics have been dismissed from consideration in the analysis of cumulative impacts and are
27 not discussed further.

28 **Table 21-1. Resource Topics Dismissed from Further Consideration in the Analysis of**
29 **Cumulative Impacts**

Resource Topic Not Discussed Further	Rationale
Agricultural and Forest Resources	As described in Chapter 5, <i>Agriculture and Forestry</i> , the Proposed Project would not convert agricultural lands or forest lands to non-agricultural uses; therefore it would not have the potential to contribute to any cumulative impacts related to agricultural resources or forestry uses.
Cultural Resources	The Proposed Project would not result in any impacts to known significant cultural resources, and the possibility of the Proposed Project affecting unknown significant cultural resources is speculative (and very low). Therefore, the Proposed Project would not contribute to any significant cumulative impacts related to cultural resources.

Resource Topic Not Discussed Further	Rationale
Geology, Soils, and Seismicity	Similar to the Proposed Project, other construction projects that involve new structures would be required to withstand seismic hazards including liquefaction, expansive soils, and corrosive soils. Because no cumulative projects would overlap the Proposed Project area (aside from the existing Suncrest Substation), there would be no cumulative geologic, soils, or seismic impacts.
Hydrology and Water Quality	As described in Chapter 12, <i>Hydrology and Water Quality</i> , the Proposed Project would be required to obtain a General Construction Stormwater Permit from San Diego Regional Water Quality Control Board, which includes preparation and implementation of a SWPPP and a number of construction BMPs that prevent erosion and potential water quality impacts to nearby waters. Similarly, due to the scale of other nearby projects listed in Table 21-2, those projects would also be required to obtain a General Construction Stormwater Permit and implement Best Management Practices that would reduce construction-related impacts to adjacent waters. For these reasons, there would be no significant cumulative impact to which the Proposed Project would contribute.
Land Use and Planning	This topic has been dismissed from the cumulative analysis because, similar to the Proposed Project, other major projects are subject to planning, environmental review, and a permitting process. Through these processes, inconsistencies with relevant plans and policies would be resolved before project implementation. Therefore, consistency with local plans and policies would not apply in the cumulative context.
Mineral Resources	As described in Chapter 14, <i>Mineral Resources</i> , the Proposed Project is not located on or in the vicinity of any known mineral resources. Therefore, there is no cumulative impact regarding mineral resources to which the Proposed Project could contribute.
Noise and Vibration	The geographic extent of any cumulative noise impacts is generally within approximately 0.62 mile of the project work area. As described in Chapter 15, <i>Noise and Vibration</i> , this represents the farthest extent where the loudest construction activities at the project work area might be audible from a sensitive noise receptor (e.g., resident). As discussed in Chapter 15, construction activities for the Proposed Project would not exceed noise level standards established by San Diego County. Even if construction of the Proposed Project occurs simultaneously with one or more projects listed in Table 21-3, below, given that the closest projects are located over 1 mile away from the Proposed Project, there would be no significant cumulative noise impact.

Resource Topic Not Discussed Further	Rationale
Population and Housing	Information collected during the preparation of this environmental document suggests that substantial population growth is not an issue in the project area, and that sufficient housing exists to accommodate construction employees at either site. As such, there is no cumulative impact to which the Proposed Project could contribute.
Recreation	As described in Chapter 18, <i>Recreation</i> , the Proposed Project would not substantially increase population and therefore would not increase demand for recreational facilities. For this reason, there is no cumulative recreation impact to which the Proposed Project could contribute.

1 Geographic Scope of Analysis

2 The level of detail of a cumulative impact analysis should consider a proposed project's
3 geographic scope and other factors (e.g., a project's construction or operation activities, the
4 nature of the environmental resource being examined) to ensure that the level of detail is
5 practical and reasonable. The discussion focuses on the potential cumulative impacts of the
6 Proposed Project for environmental resources that could be expected to be cumulatively
7 affected by the Proposed Project in conjunction with other past, present, and reasonably
8 foreseeable future projects. The specific geographic scope for each environmental resource
9 topic analyzed in this Draft EIR for cumulative impacts is provided below.

10 The defined specific geographic scope for each environmental resource area analyzed in this
11 Draft EIR to which the Proposed Project could contribute to cumulative impacts is provided
12 below in **Table 21-2**.

13 **Table 21-2. Geographic Scope for Resources with Cumulative Impacts Relevant to the**
14 **Proposed Project**

Resource	Geographic Scope	Explanation for the Geographic Scope
Aesthetics	Areas immediately adjacent to the Proposed Project.	This area covers the viewshed of the project vicinity and the immediate surroundings that might affect viewers of the Proposed Project.
Air Quality	Generally limited to areas within 1 mile of any Project work area.	This maximum area is defined because air quality impacts quickly disperse, or dissipate, over distance from the source of emissions and would not have a substantial additive effect with other emissions sources that are located more than a mile away.
Biological Resources	Wetlands and other waters, riparian habitat, sensitive natural communities, and other habitats within the Project vicinity that might	This area covers habitats and wildlife species that could be affected by the Proposed Project and the cumulative projects identified in Table 21-3, including areas that might be disturbed during project construction activities.

Resource	Geographic Scope	Explanation for the Geographic Scope
	support special-status species	
Hazards and Hazardous Materials	Generally, within 3 miles of the Proposed Project	This area generally includes SDG&E-owned lands and lands within the Cleveland National Forest.
Public Services and Utilities	Generally, the area within 5 miles of the Proposed Project	This includes fire protection services within Very High Fire Hazard areas in the vicinity of the Proposed Project.
Traffic and Transportation	Roadway segments in the vicinity of the Proposed Project (e.g., Bell Bluff Truck Trail, Japatul Valley Road, and I-8)	This area includes roads and intersections within the vicinity of the Proposed Project where Level of Service could be adversely affected from construction of the Proposed Project in combination with other planned projects.

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Table 21-3 lists projects planned in San Diego County that could affect resources that would also be affected by the Proposed Project. The list was developed by reviewing sources available on the San Diego County website, the Governor’s Office of Planning and Research CEQAnet database, Caltrans website, California Public Utility Commissions (CPUC) website, and U. S. Forest Service (USFS) Cleveland National Forest website. While it is unlikely that every potential cumulative project is listed, the list of cumulative projects is considered sufficiently comprehensive and representative of the types of impacts that would be generated by other projects similar to or related to the Proposed Project. The evaluation of cumulative impacts assumes that the impacts of past and present projects are represented by baseline conditions, and that cumulative impacts are considered in the context of baseline conditions alongside reasonably foreseeable future projects.

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Table 21-3. Reasonably Foreseeable Future Projects that Might Cumulatively Affect Resources of Concern for the Proposed Project

Project Title	Brief Project Description	Distance from Project Site
Sunrise Powerlink Transmission Project	Construction and operation of 500 kilovolt (kV) and 230 kV electric transmission lines; transmission level substation operating at 500 kV and 230 kV. Construction was completed in 2012.	Adjacent to the project site. The western terminus of the Proposed Project ends at the Suncrest Substation.

Project Title	Brief Project Description	Distance from Project Site
San Diego Gas and Electric (SDG&E) Master Special Use Permit (MSUP) and Permit to Construct Power Line Replacement Projects	SDG&E proposes to combine over 70 individual use permits and easements for SDG&E electric facilities within the Cleveland National Forest into one Master Special Use Permit, which would be issued by the U.S. Forest Service. As part of this project, SDG&E also proposes to replace certain electric power lines within and outside the Cleveland National Forest. Most distribution facilities would be built 14 miles east of the city of El Cajon, in the vicinity of unincorporated communities of Pauma Valley, Warner Springs, Santa Ysabel, Descanso, Pine Valley, Alpine, and Campo. The Final EIR/EIS was certified June 2015.	Wood-to-steel pole conversion would occur approximately 2.6 miles north of the Proposed Project (Viejas Grade Road).
USFS Alpine Community Defense (hazardous fuel treatment) Project	The Descanso Ranger District of the Cleveland National Forest is planning a fuels management project near the community of Alpine. The project would involve fuel management activities on approximately 448 acres in three areas: Anderson Truck Trail toward Interstate(I)-8, from Viejas Creek Road eastward in eastern Alpine, and around the Carveacre Community and access road. The purpose of the project is to provide wildfire protection for communities, infrastructure, and the National Forest. This project is currently undergoing National Environmental Policy Act (NEPA) analysis.	The nearest fuel management location (Viejas Creek Trail) to the Proposed Project is approximately 2.34 miles away.
USFS Greater Alpine Community Defense Fuels	This project entails constructing fuel breaks on private lands in the greater Alpine area to reduce wildland fire risks and improve fire suppression effectiveness and safety. The proposed treatment areas are located in the Carveacre, Japatul Valley, Rancho Nuevo, and Viejas Creek neighborhoods. This project is currently undergoing NEPA analysis.	While the actual fuel break areas are unknown, the Japatul Valley neighborhood is approximately 1.5 miles east of the Proposed Project.
Cleveland National Forest Forest-wide Unauthorized Route Decommissioning	The USFS proposes to decommission the highest priority unauthorized routes in the Cleveland National Forest and restoring those routes to a more natural condition, and educate the public and vehicle users to legal opportunities. Some unauthorized routes would be added to the National Forest System as either administrative or public roads. The project area covers unauthorized routes throughout three Ranger Districts of the Cleveland National Forest: the Trabuco Ranger District, Palomar Ranger District, and Descanso Ranger District.	Various; decommissioning of an unauthorized route near Japatul Valley Road is approximately 2.75 miles northeast of the Proposed Project
Invasive Weed Management on the Cleveland National Forest	The project involves conducting invasive species control and/or eradication efforts on Cleveland National Forest lands for certain invasive weed species and specific infestations. Combination of mechanical and chemical treatments would occur as funding allows.	Throughout Trabuco, Palomar, and Descanso Ranger Districts

Project Title	Brief Project Description	Distance from Project Site
AT&T Master Permit Renewal for Telephone Lines	The project involves renewal of AT&T's authorizations on the Cleveland National Forest. Under this permit, AT&T would renew one master permit with 135 amendments, one 50-year right-of-way, one telephone booth, and one for access on a private road to telephone facilities.	Throughout Trabuco, Palomar, and Descanso Ranger Districts
Caltrans Drainage Improvements	The project involves drainage improvements at various locations near Descanso junction from Route 8/79 Separation to 1.3 miles east of Route 8/79.	Approximately 2.7 miles

1 *Sources:* USFS 2014, 2016a, 2016b, 2016c, and 2016d; CPUC and USFS 2014; and Caltrans 2016

2 **21.4.2 Cumulative Setting**

3 This section describes the cumulative setting for which the Proposed Project could
4 potentially contribute a cumulative impact.

5 **Aesthetics**

6 The visual character of the project area and surrounding area is described in Chapter 4,
7 Section 4.3. Of the projects listed in Table 21-3, projects that could contribute to cumulative
8 aesthetics impacts include the Suncrest Substation which was constructed as part of the
9 Sunrise Powerlink Transmission Project, and the SDG&E MSUP and Permit to Construct
10 Power Line Replacement Project. These two projects in combination with the Proposed
11 Project would result in a cumulative effect on the visual character or quality of the area if they
12 adversely affect the same scenic resources or views from nearby roads such as Bell Bluff
13 Truck Trail and Japatul Road.

14 **Air Quality**

15 The existing ambient air quality conditions are summarized in Chapter 6, Section 6.3. The
16 Proposed Project is located in a portion of the San Diego Air Basin (SDAB) that is designated
17 as nonattainment of the federal and State ozone standards, and State Particulate Matter
18 (PM)₁₀ and PM_{2.5} standards. Air quality has improved over time as various regulations
19 affecting emissions sources, such as the mobile and stationary sources regulations enacted
20 by California Air Resources Board (CARB) and San Diego Air Pollution Control District
21 (SDAPCD), have started to take effect. Even considering significant population growth,
22 concentrations of all criteria pollutants within the SDAB have generally gone down over time
23 since major air quality regulations were enacted in the 1970s. Air quality is forecast to
24 improve slowly within the SDAB as current regulations continue to reduce air pollutant
25 emissions from stationary, mobile, and area emission sources.

26 **Biological Resources**

27 Ongoing and future development activities in the project vicinity, including Cleveland
28 National Forest, would result in impacts on many of the same habitat types and species that
29 would be affected by the proposed project. Table 21-3 identifies several planned projects
30 near the project area that could potentially affect biological resources during the same time
31 period as the proposed project. This is considered a potentially significant cumulative impact.

1 Hazards and Hazardous Materials

2 The existing wildfire risks for the project area and greater San Diego are described in Chapter
3 11, Section 11.3.4. The Proposed Project and surrounding areas are within a Very High Fire
4 Hazard Severity Zone (CAL FIRE 2007), which indicates that the physical conditions create a
5 very high likelihood that the area will burn over a 30 to 50-year timeframe. In general, San
6 Diego County is also subject to extreme fire danger due to both physical and climatic reasons.
7 In the fall season, extreme fire weather conditions include low humidity, sustained wind-
8 speeds, and strong wind gust. The Santa Ana can create a fire danger with winds typically
9 blowing from the northeast over the Peninsular Ranges. Such winds can have sustained
10 speeds of 40 miles per hour (mph) and gusts over 100 mph.

11 Public Services and Utilities

12 The Proposed Project area is located in a Very High Fire Hazard Area and is therefore
13 susceptible to fire. Past, present, and reasonably foreseeable projects – particularly the
14 Sunrise Powerlink Project’s Suncrest Substation – have substantially increased the likelihood
15 of accidental wildfires in the region. The existing Suncrest Substation and associated Sunrise
16 power lines had a significant and unavoidable impact on the ability to suppress fires in the
17 vicinity of the Suncrest Substation. This is a significant cumulative impact on fire protection
18 services.

19 Transportation and Traffic

20 The existing traffic conditions for roadways in the project vicinity are described in Chapter
21 19, Section 19.3. The Proposed Project is located off of Bell Bluff Truck Trail, which is a
22 private, paved road that runs parallel to and is located approximately 1.8 miles south of I-8.
23 Japatul Valley Road, located east of the Proposed Project, is a north-south light collector road
24 that connects to I-8 and the south terminus of State Route 79. I-8 is an east-west limited
25 access freeway that provides direct access into San Diego and the greater metropolitan area.

26 21.4.3 Cumulative Impact Analysis

27 Impact CUM-1: Cumulative Impacts on Aesthetics.

28 As described in Chapter 4, *Aesthetics*, the Proposed Project would permanently alter views of
29 the project area through construction of the new SVC, riser pole, and 300-foot overhead span
30 connecting with the existing Suncrest Substation. In general, introduction of these new
31 aboveground facilities would not substantially alter the visual character given the presence
32 of other industrial features within the visual setting (e.g., the Sunrise Powerlink transmission
33 lines and Suncrest Substation). While the proposed rise pole and 300-foot-long overhead
34 span next to the Suncrest Substation would incrementally alter the views from Bell Bluff
35 Truck Trail at the western end of the project area, such structures would be similar in
36 character to the existing Suncrest Substation and Sunrise Powerlink transmission lines and
37 would not substantially degrade the visual character of the project area. In addition, because
38 the proposed SVC is located far (over one mile away) from the existing Suncrest Substation,
39 the SVC in combination with the Suncrest Substation would not substantially degrade scenic
40 views or the visual character of the project area.

1 It is possible that some views of the Proposed Project along with one or more transmission
 2 lines of SDG&E's MSUP Project may be visible. For example, TL625 would be approximately
 3 1.5 miles away from the Proposed Project. Because this transmission line would be far from
 4 the aboveground components of the Proposed Project, there would be no significant
 5 cumulative impact on aesthetics associated with these two projects. In conclusion, the
 6 Proposed Project's contribution to cumulative impacts regarding aesthetics would not be
 7 considerable (less than significant).

8 **Impact CUM-2: Cumulative Impacts Related to Increase of Criteria**
 9 **Pollutants.**

10 As discussed in Chapter 6, *Air Quality*, construction of the Proposed Project would involve
 11 ground-disturbing activities that require use of construction equipment and vehicles. With
 12 implementation of APMs AIR-1, AIR-2, and Mitigation Measure AQ-1, which requires use of
 13 U.S. Environmental Protection Agency/CARB Tier 3 or better compliant engines, the
 14 Proposed Project would not result in construction emissions exceeding the County of San
 15 Diego emissions significance thresholds.

16 Even if construction of the Proposed Project occurs at the same time as one or more of the
 17 projects listed in Table 21-3, with implementation of the measures mentioned above, the
 18 Proposed Project's contribution to cumulatively significant impacts regarding air pollutant
 19 emissions would not be considerable (less than significant).

20 **Impact CUM-3: Cumulative Impacts on Biological Resources.**

21 The Proposed Project could potentially affect biological resources through habitat alterations
 22 or losses. Project activities would involve vegetation clearance, grubbing, ground-disturbing
 23 activities, and blasting. These activities would potentially affect various biological resources
 24 including:

- 25 ▪ Temporary disturbance or permanent loss of special-status plants such as felt-leaved
 26 monardella, San Diego milk-vetch, delicate clarkia, and other plant species.
- 27 ▪ Temporary construction-related impacts to nesting birds protected by the MBTA and
 28 special status birds including Golden Eagles.
- 29 ▪ Temporary disturbance, loss of habitat, or direct mortality of special-status mammals
 30 and reptiles, including red-diamond rattlesnake, coastal whiptail, coast horned lizard,
 31 coast patch-nosed snake, pallid bat, Dulzura pocket mouse, northwestern San Diego
 32 pocket mouse, Townsend's big-eared bat, Stephens' kangaroo rat, western mastiff
 33 bat, and San Diego desert woodrat.
- 34 ▪ Temporary and permanent loss of Engelmann Oak – Coast Live Oak/Poison Oak/
 35 Grass Association (a sensitive natural community).
- 36 ▪ Temporary sediment-related impacts on nearby waters.
- 37 ▪ Temporary barriers to wildlife movement and temporary construction-related
 38 impacts to wildlife breeding.

1 The cumulative impact on biological resources resulting from the Proposed Project in
2 combination with other projects listed in Table 21-3 and the greater San Diego County would
3 depend upon the relative magnitude of adverse effects of those projects on biological
4 resources compared to the relative benefit of impact avoidance and minimization efforts
5 prescribed by planning documents, CEQA mitigation measures, and permit requirements for
6 each project. The cumulative impact on biological resources would also depend on the
7 benefits that would be realized from adopted habitat conservation plans such as the San
8 Diego Multiple Species Conservation Program. In the absence of avoidance and minimization
9 measures, compensatory mitigation, and conservation measures, significant cumulative
10 impacts on biological resources would occur. However, the County of San Diego General Plan
11 contains conservation measures that would benefit biological resources, as well as measures
12 to avoid, minimize, and mitigate impacts to these resources. Potential BMPs and mitigation
13 measures for the above-listed cumulative projects may include pre-construction surveys and
14 avoidance measures to protect plants, wildlife, waters of the U.S. and state, and sensitive
15 natural communities and breeding. Projects such as the SDG&E MSUP and Permit to
16 Construct Power Line Replacement Projects, USFS Alpine Community Defense Project, and
17 USFS Greater Alpine Community Defense Fuels would likely have impacts on resources such
18 as special status species habitat and sensitive natural habitats which are similar to the
19 Proposed Project. Projects such as the Cleveland National Forest Forest-wide Unauthorized
20 Route Decommissioning and Invasive Weed Management on the Cleveland National Forest
21 would likely have long-term benefits to plants and wildlife in the area, by removing invasive
22 species and decommissioning environmentally damaging unauthorized routes.

23 The Proposed Project would implement Mitigation Measures BIO-1 through BIO-18,
24 described in Chapter 4, *Biological Resources*, to avoid, reduce, or compensate its impacts.
25 Through BMPs, mitigation measures contained in this EIR as well as other CEQA documents
26 for nearby projects, and compliance with permit conditions, projects in the region would
27 mitigate their contributions to biological resources impacts and thereby reduce cumulative
28 impacts. By implementing Mitigation Measures BIO-1 through BIO-18, the Proposed Project
29 would ensure that its contributions to cumulative impacts on biological resources would not
30 be considerable.

31 **Impact CUM-4: Cumulative Impacts related to Hazards and Hazardous** 32 **Materials.**

33 As described in Chapter 11, project construction would involve use of combustion-engine
34 construction equipment as well as storage of potentially flammable materials, such as fuel or
35 lubricating oil. These activities could provide a spark or ignition source, or introduce
36 materials that could combust or burn at high intensity if exposed to a heat source. During the
37 construction phase, use of such equipment and use or storage of flammable materials could
38 increase the risk of initiating a wildland fire. Similarly, other cumulative projects would
39 potentially involve use of combustion-engine construction equipment and flammable
40 materials that could increase the risk of a wildland fire. Therefore, a potentially significant
41 cumulative impact regarding wildland fires would occur. As described in Chapter 11,
42 Mitigation Measure HAZ-2, which requires preparation and implementation of a Construction
43 Fire Prevention Plan, would reduce the potential for wildland fire risk under the Proposed
44 Project. Because development of such plans is a requirement in the San Diego County
45 Consolidated Fire Code, other cumulative projects may be required to prepare an implement
46 a similar fire prevention plan. It should also be noted that the purpose of several nearby
47 projects is to reduce hazardous fuels (e.g., the USFS Alpine Community Defense Project and

1 the USFS Greater Alpine Community Defense Fuels). In conclusion, given the nature of nearby
2 projects and because the Proposed Project would implement a fire prevention plan, the
3 Proposed Project's contribution to this cumulative impact would not be considerable (less
4 than significant).

5 **Impact CUM-5: Cumulative Impacts on Fire Protection Services.**

6 As described in Chapter 17, the Proposed Project would involve use of internal-combustion
7 construction equipment during construction, which could potentially generate a spark or
8 provide an ignition source. Additionally, the Project may involve blasting during Project
9 construction and potentially may require storage of explosives on-site, which could create
10 fire hazard risk.

11 Implementation of Mitigation Measure PUB/UTL-1 would ensure that NEET West
12 coordinates with the County of San Diego, California Department of Forestry and Fire
13 Protection, and U.S. Fish and Wildlife Service to determine if additional fire protection
14 improvements are needed to ensure adequate fire protection services for the Proposed
15 Project. With implementation of this measure and given that other proposed projects in the
16 vicinity would also be required to implement measures to that minimize wildland fire
17 hazards (e.g., the Alpine Community Defense Project and Greater Alpine Community Defense
18 Fuels Project), there would be no considerable contribution to this significant cumulative
19 impact regarding fire protection services.

20 **Impact CUM-6: Cumulative Impacts on Traffic during Construction of the** 21 **Proposed Project.**

22 As described in Chapter 19, construction workers accessing the work sites would add vehicle
23 traffic to area roadways which could result in temporary traffic increases. However, these
24 trips would be negligible considering the average daily traffic and existing Level of Service on
25 I-8 and local roadways. In addition, as discussed in Chapter 19, Mitigation Measures TR-1 and
26 TR-2 would reduce the effects of construction activities and construction traffic on roadways
27 by conducting traffic flow measures and implementing a traffic control plan. Several of the
28 construction projects listed in Table 21-3 are undergoing NEPA analysis and the construction
29 schedules for those projects are not yet clearly defined. Even if construction of the Proposed
30 Project overlaps with the construction schedule of one or more of the projects listed in Table
31 21-3, because the levels of service on nearby roads is relatively high, the number of vehicle
32 trips generated by the Proposed Project would not considerably contribute to a cumulative
33 traffic impact (less than significant).