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4.16 CUMULATIVE IMPACTS

4.16.1 Introduction

This section of the PEA discusses potential cumulative impacts related to the construction, operation, and maintenance of the Proposed Project. The purpose of the Proposed Project is to increase fire safety and system reliability along TL 637 between the Creelman and Santa Ysabel Substations, as described further in Section 2.0, Proposed Project Purpose and Need. As explained within Sections 4.1 through 4.15, no significant impacts were identified for the Proposed Project.

The Proposed Project is the reconstruction of an existing 69kV wood power line. The Proposed Project is located within existing SDG&E ROW, where SDG&E currently maintains and operates existing electric power, distribution and substation facilities. The existing power line facilities would be removed and rebuilt within existing SDG&E ROW, and some areas that are currently disturbed would be restored and/or allowed to revegetate. Approximately seven poles would be removed and not replaced (e.g. removed from service), and approximately 1,170 feet of power line (three poles) that is currently located within jurisdictional water resources (wet meadow) would be relocated outside of the jurisdictional waters. SDG&E's existing facilities and operations and maintenance activities are included in the baseline for evaluating the impacts of the Proposed Project.

Permanent impacts associated with the construction of the Proposed Project would be offset considerably or entirely by the removal of existing facilities, some of which would be eliminated and not replaced with new structures. For example, in terms of permanent impacts from ground disturbance associated with construction of the Proposed Project, the Proposed Project would provide a net reduction in permanent impacts, as existing facilities would be removed, some poles would not be replaced and other poles would be relocated to eliminate existing impacts to jurisdictional or sensitive resources. With respect to potential permanent impacts on aesthetics, the Proposed Project will rebuild the existing power line in substantially the same alignment as the existing TL 637 facilities and within SDG&E's existing ROW. As discussed in Section 4.1, the visual impacts of the Proposed Project are incremental and not significant. Therefore, the Proposed Project would not contribute to any cumulatively significant permanent impacts as a result of construction of the Proposed Project.

Similarly, operation and maintenance of the Proposed Project would not be substantially different from existing, baseline conditions, and would be slightly less than baseline due to the increased reliability of the new power line components included in a typical wood to steel replacement project, the installation of fewer poles along the alignment, and the relocation of poles outside of jurisdictional features. Therefore, The Proposed Project would not contribute to any cumulatively significant impacts during operation and maintenance activities in any of the resource areas evaluated under CEQA.

4.16.2 Significance Criteria

CEQA defines a cumulative impact as one *"which is created as a result of the project…together with other [past, present, and future] projects causing related impacts."* Cumulative impacts refer to two or more individual effects which, when considered together, are considerable and cumulatively exceed the criteria established for each resource area as described in Sections 4.1 through 4.15 of the PEA. In such cases, the Proposed Project's contribution is analyzed to determine whether it is cumulatively considerable. *CEQA Guidelines* Section 15064(h)(1) further explains that:

> *…when assessing whether a cumulative effect requires an [Environmental Impact Report], the lead agency shall consider whether the cumulative impact is significant and [whether] the project's incremental effect, though individually limited, is 'cumulatively considerable.'*

Applying this qualitative standard necessarily requires application of judgment based on the facts of a particular project subject to CEQA.

Further, the significance of an impact may be weighed against the overall effect as both increases and decreases in impacts may balance one another. As noted in the *CEQA Guidelines*:

> *The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

4.16.3 Timeframe of Analysis

For the purpose of this cumulative impacts analysis, the Proposed Project is defined in terms of construction duration as well as post-construction operation and maintenance activities. SDG&E anticipates that construction of the Proposed Project would take a total of approximately nine months, spanning from January through September 2014. Operation and maintenance of the Proposed Project would occur for the foreseeable future following the completion of construction.

4.16.4 Area of Analysis

In accordance with *CEQA Guidelines* Section 15130(b), past, present, and planned/reasonably foreseeable future projects located within one mile of the Proposed Project were reviewed in order to identify any projects that could, when combined with the Proposed Project, create a cumulatively considerable effect. The analysis of potential cumulative impacts was limited to within approximately one mile of the Proposed Project components because this distance was estimated to be the furthest that the Proposed Project impacts, if any, could extend.

4.16.5 Methodology

Existing conditions and reasonably foreseeable projects were identified within a one-mile radius of each Proposed Project component. Information was gathered from internet searches of local planning department and state agency websites and correspondence with agency staff. The

websites of the following entities were reviewed and/or these agencies contacted regarding development projects, road and utility improvement projects, and capital investment projects:

- SDG&E,
- County of San Diego,
- CPUC,
- CEC,
- CAISO,
- Cleveland National Forest, and
- Caltrans.

4.16.6 Existing/Operating Projects

The Proposed Project is generally surrounded by rural (mainly open space) with some limited residential and commercial development near the Santa Ysabel and Creelman Substations and between Pole Nos. D40 and P65. Section 4.9, Land Use and Planning, outlines all of the specific existing land uses for the entire Proposed Project vicinity.

4.16.7 Foreseeable Projects Inventory

For the purposes of this document, "reasonably foreseeable" refers to projects that federal, state, or local agency representatives have knowledge of resulting from a formal application process. Table 4.16-1, Planned and Proposed Projects within One Mile of the Proposed Project Area, lists known projects that are within one-mile of the Proposed Project facilities with the potential to create cumulative impacts. A total of four such projects have been identified within one-mile of the Proposed Project. Figure 4.16-1, Foreseeable Projects Map, depicts the location of each project with respect to the Proposed Project components.

Projects are included that are located within one mile of the Proposed Project and are of sufficient size and type such that, when combined with the Proposed Project, there would be a potential for cumulative effects on the environment. For example, small-scale discretionary projects like usage permit projects (such as liquor license applications) that are internal to an existing building or development and have no potentially significant impact to the environment, modifications to existing individual homes or businesses that do not result in any increases in noise, traffic, air emissions, etc. (i.e. architectural modifications to existing structures such as patios, decks, fences, and awnings), and site-specific residential developments (including swimming pools, backyard renovations, and second story additions), do not create incremental environmental impacts that, when added with the impacts from the Proposed Project, could potentially result in a cumulatively significant impact.

Table 4.16-1: Planned and Proposed Projects within One Mile of the Proposed Project Area

Project Name	Project Location[1]	Approximate Distance from the Proposed Project[1]	Project Description/Size	Anticipated Construction Schedule	
				Begin	End
TL 626 Wood-to-Steel project	Cleveland National Forest and surrounding private lands	Immediately adjacent to approximately 16 miles from Proposed Project	Proposed wood-to-steel re-construction of existing 69kV power line. The TL 626 project is one of 11 power line and distribution line fire hardening projects included in SDG&E's application to the USFS for a Master Special Use Permit to maintain electrical facilities within the Cleveland National Forest and one of five 69kV power line fire hardening projects included in SDG&E's application to the CPUC for a Permit to Construct for Power Line Reconstruction Projects (collectively, CNF MSUP/PTC)[2]. TL 626 is the only project in the CNF MSUP/PTC within ten miles of the Proposed Project and only a small portion of TL 626 is within one mile of the Proposed Project. The Proposed Project and the TL 626 project both propose to replace approximately 12 poles and conductor where TL 637 and 626 are co-located on double-circuit structures. These 12 structures will be replaced as part of whichever project proceeds first.	TBD	TBD
				(5 year total construction) Based upon preliminary engineering and planning	
Circuit 222 Wood-to-Steel project	Private lands southwest of Santa Ysabel	Immediately adjacent to approximately 1.8 miles from TL 637. Circuit 222 crosses TL 637 at Pole No. P94.	Replacement of approximately 300 wood distribution poles with new weathering steel poles along Circuit 222. Circuit 222 is located northwest of the TL 637 alignment, south of the Santa Ysabel Substation. Circuit 222 and TL 637 share one pole (Pole No. P94). At this pole, C222 is located in a buck position, running across (not parallel to) the TL 637 alignment.	September 2013	February 2014
Sol Orchard SD-5 - Santa Ysabel	Julian Road (Hwy 78), approximately one mile west of Hwy 79.	Approximately 1.2 miles west of Santa Ysabel Substation and 0.9 mile northwest of Pole No. P142	Proposed 7.17 acres of photovoltaic panels located on 78.70 acre site. Project not yet approved.	No construction schedule set[3]	

Table 4.16-1 (cont.): Planned and Proposed Projects within One Mile of the Proposed Project Area

Project Name	Project Location[1]	Approximate Distance from the Proposed Project[1]	Project Description/Size	Anticipated Construction Schedule	
				Begin	End
Sol Orchard Solar Farm	Ramona Street and 1650 Warnock Drive	Approximately 0.30 mile from Warnock Drive Staging Area	Proposed 46 acres of photovoltaic panels located on 110 acre site with a production capacity of 7.5 Megawatts (MW). Solar Farm approved by the DPLU Oct 19, 2012	2nd quarter 2013	4th quarter 2013
Feral Pig Control	Cleveland National Forest, All Districts	Varies, project covers a large portion of Cleveland National Forest	The Cleveland National Forest proposes to reduce and, where possible, eliminate further impacts from increasing numbers of non-native wild pigs on Forest Service land and water resources, including impacts to plant and animal species. Management of Feral Pig Population through hunting within the Palomar and Descanso Ranger Districts.	Project begin - Oct 2012	No end date listed

Notes:
[1]Refer to Figure 4.16-1 for locations of all of the projects listed in this table and locations relative to the Proposed Project facilities.
[2]As proposed by SDG&E, the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with construction of TL 626, which is anticipated to be constructed in late 2014. Moreover, the Proposed Project would only coincide with CNF MSUP/PTC projects that are more than 20 miles from the Proposed Project and therefore not cumulatively considerable.
[3]Project application has not seen recent activity from the applicant and no plan for construction or issuance of permits currently exists. Project remains on this list because the case file is still open and the project could still move forward.
Sources: https://publicservices.sdcounty.ca.gov/CitizenAccess/, San Diego County Planning Department, Cleveland National Forest, SDG&E Cleveland National Forest Master Special Use Permit Preliminary Plan of Development (SDG&E 2012), SDG&E Permit to Construct Power Line Replacement Projects (SDG&E 2012)

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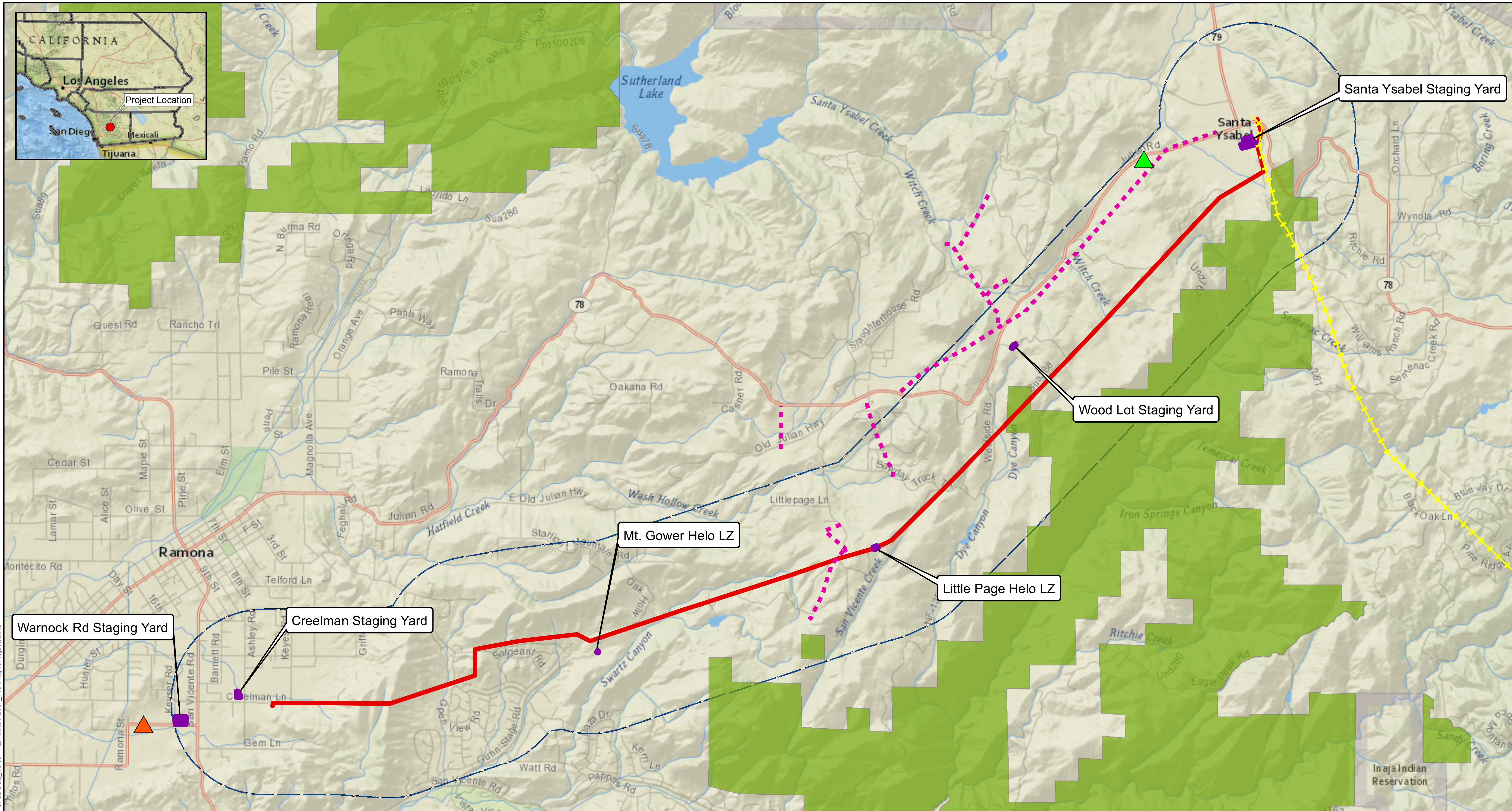

Created For:	Created By:
Brad Carter	TRC

Date: 2/13/2013

SDG&E is providing this map with the understanding that the map is not survey grade.

- Tie-Line 637 Alignment
- 1-mile Buffer
- Staging Yards and Helicopter Landing Zones
- Tie-Line 626 Wood-to-Steel Project
- Circuit 222 Wood-To-Steel Project
- Sol Orchard Solar Farm Project
- Sol Orchard SD-5 (Santa Ysabel) Project
- Feral Pig Management Project

Tie-Line 637 Wood-To-Steel Project

Foreseeable Projects Map

Figure 4.16-1

0 1 2 3 Miles

N

SDGE A Sempra Energy utility

Data Source: SDG&E; County of San Diego; California Protected Areas Database, July 2012; Basemap Source: National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, iPC

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BACK OF FIGURE 4.16-1

4.16.8 Potential Cumulative Impacts

This section of the PEA discusses potential cumulative impacts associated with the Proposed Project. As discussed in Section 4.16.2, cumulative impacts are those impacts that result from a combination of effects from the Proposed Project and other past, present, or planned, approved, or otherwise probable future projects. In order for cumulatively significant impacts to result, projects must generally share two factors in common; schedule and location. Thus, for cumulative impacts to occur, the Proposed Project must occur within the vicinity of other projects and be either constructed or operated at the same time, such that impacts associated with the project can combine for a net effect greater than either project taken individually. Projects that were not within one mile of the Proposed Project and would not likely be constructed or operated at the same time as the Proposed Project are not analyzed herein.

The potential cumulative impacts are analyzed for the following resource areas:

- Aesthetics,
- Agriculture and Forestry,
- Air Quality and Greenhouse Gases,
- Biological Resources,
- Cultural Resources,
- Geology and Soils,
- Hazards and Hazardous Materials,
- Hydrology and Water Quality,
- Land Use and Planning,
- Noise,
- Population and Housing,
- Public Services,
- Recreation.
- Transportation and Traffic, and
- Utilities and Service Systems.

For each of these resource areas, only the areas in which a potential cumulative impact exists are discussed. Where there is no potential for the Proposed Project to create an adverse effect relating to an individual CEQA Appendix G criterion, no potential for cumulative effects were deemed possible and the particular criterion is not discussed. At the beginning of each subsection below, the specific criterion with no potential for impacts are listed. Where there is potential for adverse impact, the pertinent CEQA Appendix G significance criteria are discussed and the Proposed Project's contribution of any cumulatively considerable effects is analyzed.

No impacts were identified relating to the following CEQA Appendix G resource areas; therefore there is no discussion of potential cumulative impacts relating to these resource areas:

- Agriculture and Forestry Resources,
- Mineral Resources,
- Land Use and Planning,
- Population and Housing, and
- Public Services.

4.16.8.1 Aesthetics

The Proposed Project would not have any impacts associated with the following CEQA Appendix G significance criteria relating to aesthetics or visual resources during construction or operations and maintenance:

- Substantial adverse effects on scenic vistas (Question 1a),
- Substantial damage to scenic resources (Question 1b), and
- New light or Glare (Question 1d).

Therefore, there would be no potential for cumulatively considerable impacts associated with these significance criteria and the above listed criteria are not further discussed herein. The remaining aesthetics-related impacts are discussed below for construction, operation, and maintenance of the Proposed Project.

Construction

Overall Visual Character

Construction of the Proposed Project is anticipated to have temporary, less than significant impacts on the overall visual character of the surrounding area. Similarly, the projects listed in Table 4.16-1 would also result in temporary impacts in this regard. Where construction of multiple projects overlap, and construction equipment and activities are visible within the same viewsheds, impacts would be cumulatively considerable. The Proposed Project could contribute to cumulative effects on the overall visual character of the surrounding area in conjunction with the following projects, assuming that construction activities overlap:

- TL 626 project,
- Circuit 222 project,
- Sol Orchard Solar Farm project, and
- Sol Orchard SD-5 (Santa Ysabel) project.

However, there are currently no plans for construction of the Sol Orchard SD-5 (Santa Ysabel) project, the Sol Orchard Solar Farm project will be constructed prior to planned construction of the Proposed Project, and construction of the TL 626 project is not anticipated to occur concurrently with the Proposed Project. Active construction of the Circuit 222 project would not occur within one mile of active construction of the Proposed Project, unless specifically requested by a land owner. If construction of the Proposed Project and the Circuit 222 project

were to be purposefully overlapped, it would be only in limited, specific areas for the purpose of reducing impacts to adjacent land owner(s). Construction would occur utilizing common access roads, staging yards, and would share other common construction support services and land uses such that any potential combined impact is minimized. The Circuit 222 project is an independent distribution line project that is located entirely within private lands, and therefore the construction schedule is at the sole discretion of SDG&E. SDG&E can therefore ensure that construction of the two projects will typically not overlap, regardless of the eventual construction schedule for TL 637 (which is subject to the issuance of a PTC by the CPUC). Therefore construction activities for the Proposed Project would not be visible within a common viewshed along with construction activities associated with any of the projects listed in Table 4.16-1. The CPUC has discretionary approval authority over both the Proposed Project and the TL 626 project; therefore, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the two projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 would not proceed in the immediate vicinity of the Proposed Project while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project.

Therefore, construction of the Proposed Project is not anticipated to contribute to any significant cumulative adverse impacts relating to the overall visual character of the Proposed Project area.

Operation & Maintenance

Overall Visual Character

Operation and maintenance of the Proposed Project is anticipated to have less than significant impacts on the overall visual character of the surrounding area.

Some of the projects listed in Table 4.16-1 could result in significant changes to the overall visual character of the surrounding area, most notably the Santa Ysabel Solar Farm and the Sol Orchard Solar Farm. However, these projects are not located in the immediate vicinity of the Proposed Project and are therefore not likely to create a cumulatively considerable effect in combination with the Proposed Project. The Sol Orchard SD-5 project is located approximately 1.2 miles west of the Santa Ysabel Substation and the Sol Orchard Solar Farm project is located approximately 1.3 miles west of the Creelman Substation.

With respect to the TL 626 and Circuit 222 projects, significant cumulative effects are also not anticipated because the Proposed Project, TL 626, and Circuit 222 facilities would be very similar, and located in very similar alignment to current existing electric power and distribution facilities. All three projects represent reconstruction of existing electric facilities in locations where similar facilities already exist. Therefore, the Proposed Project is not anticipated to contribute to any cumulatively considerable adverse effects on the overall visual character of the Proposed Project area.

4.16.8.2 Air Quality and Greenhouse Gases

As outlined in Section 4.3, Air Quality and Greenhouse Gases, there is no potential for impacts to occur during operation and maintenance of the Proposed Project because operation and

maintenance activities will be slightly less than current, baseline operation and maintenance activities. Therefore, there would be no potential for cumulatively considerable impacts associated with operation and maintenance. Potential cumulative impacts associated with operation and maintenance of the Proposed Project are not further discussed herein. Air quality and GHG-related construction impacts are discussed below for the Proposed Project.

Construction

Construction of the Proposed Project is anticipated to result in less than significant short-term impacts to air quality standards, compliance with the RAQS and SIP, exposure of sensitive receptors to pollutant emissions, creation of objectionable odors, generation of GHGs, and compliance with GHG plans, policies, and regulations. The potential for cumulatively considerable effects relating to these significance criteria is discussed below.

Compliance with the RAQS and SIP

Construction of the Proposed Project would result in short-term, temporary emissions of criteria pollutants. These emissions would not constitute non-compliance with the RAQS and SIP as construction is not anticipated to result in emissions that would exceed APCD thresholds. Four of the other projects listed in Table 4.16-1 could either result in emissions greater than the APCD thresholds individually, or when combined with the Proposed Project. However, none of those projects are currently anticipated to have construction overlap with the Proposed Project construction (January through September of 2014), except for potential limited overlap between the Proposed Project and the Circuit 222 project. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in emissions sources would occur; and therefore cumulative emissions would not exceed significance thresholds. Upon receipt of a request to have the Proposed Project and the Circuit 22 project constructed at one time, SDG&E project management and Environmental Programs staff for both projects will participate in a construction coordination meeting to ensure that the combined construction activities do not result in cumulatively considerable impacts relating to construction emissions. Therefore cumulative impacts, if any, would be less than significant.

The CPUC has discretionary approval authority over both the Proposed Project and the TL 626 project; therefore, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the Proposed Project and TL 626 projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 project would not proceed in the immediate vicinity of the Proposed Project while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project.

Therefore, no significant cumulatively considerable adverse effects are anticipated relating to compliance with the RAQS and SIP.

Air Quality Standards

As stated above and within Section 4.3, Air Quality and Greenhouse Gases, emissions from construction of the individual segments of the Proposed Project would result in less than significant, short-term, temporary impacts relating to emission of the criteria pollutants. Similar to the Proposed Project, some of the projects listed in Table 4.16-1 would also result in short-term impacts to air quality. Therefore, cumulatively considerable adverse effects could result where construction activities for multiple projects occur simultaneously in the same general vicinity. The only projects with the potential to have simultaneous construction activities with the Proposed Project are the TL 626 and Circuit 222 projects. Similar to the Proposed Project, these projects would result in temporary, short-term emissions of criteria pollutants above existing, baseline conditions. The CPUC has discretionary approval authority over both the Proposed Project and the TL 626 project; therefore, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the two projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 would not proceed in the immediate vicinity of the Proposed Project (portions of the TL 626 project are located greater than 10 miles from the Proposed Project) while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Therefore, no cumulatively considerable impacts are anticipated.

The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in emissions sources would occur; and therefore cumulative emissions would not exceed significance thresholds. Upon receipt of a request to have the Proposed Project and the Circuit 22 project constructed at one time, SDG&E project management and Environmental Programs staff for both projects will participate in a construction coordination meeting to ensure that the combined construction activities do not result in cumulatively considerable impacts relating to construction emissions. Therefore cumulative impacts relating to emissions of criteria pollutants, if any, would be less than significant.

Therefore, no significant cumulatively considerable adverse effects are anticipated relating to exceedance of APCD air quality standards.

Exposure of Sensitive Receptors

The Proposed Project was determined to have less than significant impacts relating to emissions of TACs during construction activities. These less than significant impacts are related to emissions of diesel particulate matter, which has been identified as having carcinogenic and chronic health effects. However, the duration of construction dictates that emissions would not occur long-term, and would occur in multiple, varying locations, thus diluting the potentially harmful emission throughout the length of the Proposed Project area. While the projects listed in Table 4.16-1 could have similar potential effects relating to exposure to sensitive receptors, these

impacts would similarly be associated with construction activities, which are by nature short-term compared to carcinogenic and chronic exposure periods established by CARB and the Office of Environmental Health Hazard Assessment guidelines. In addition, only the TL 626 and Circuit 222 projects have the potential to have overlapping construction with the Proposed Project. The CPUC has discretionary approval authority over both the Proposed Project and the TL 626 projects; therefore, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the two projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 project would not proceed in the immediate vicinity of the Proposed Project while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Therefore, cumulatively considerable impacts are not anticipated with respect to the TL 626 project.

The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in emissions sources would occur; and therefore cumulative emissions of TACs would not be significant. In addition, where the Proposed Project and the Circuit 222 project are located within 0.5 mile (near Pole No. P94), no potential sensitive receptors are present in the immediate vicinity (within approximately 450 feet). Therefore the potential for increased, cumulative adverse effects to sensitive receptors is considered to be low. Impacts, if any, would be less than significant.

Objectionable Odors

Construction of the Proposed Project is anticipated to have less than significant impacts associated with the emission of objectionable odors. Typical odor nuisances include emissions of substances such as hydrogen sulfide, ammonia, chlorine, and other sulfide-related compounds. No substantial sources of these pollutants would exist during construction of the Proposed Project, and none of the projects identified in Table 4.16-1 are likely to result in the emission of any of these substances during construction or operation, because none of them are the type of project that typically uses odor-producing compounds. Construction equipment and construction operations for the Proposed Project and the cumulative projects would emit trace pollutants that could be considered to have objectionable odors, such as diesel exhaust. However, these odors would be temporary in nature and are localized in effect. Only the TL 626 and Circuit 222 projects have the potential to have overlapping construction with the Proposed Project. The CPUC has discretionary approval authority over both the Proposed Project and the TL 626 projects; therefore, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the two projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 project would not proceed in the immediate vicinity of the Proposed Project while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Therefore, cumulatively considerable impacts are not anticipated with respect to the TL 626 project.

The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in emissions sources would occur; and therefore cumulative emissions of TACs would not be significant. In addition, where the Proposed Project and the Circuit 222 project are located within 0.5 mile (near Pole No. P94), no potential sensitive receptors are present in the immediate vicinity (within approximately 450 feet). Therefore the potential for increased, cumulative adverse effects relating to objectionable odors is considered to be low. Impacts, if any, would be less than significant.

Greenhouse Gas Emissions

The Proposed Project would result in GHG emissions during construction. These emissions would be below the County of San Diego's and SCAQMD's threshold of 10,000 metric tons of carbon dioxide equivalents annually for industrial projects. Impacts are therefore anticipated to be less than significant.

All GHG emissions can be considered to have a cumulative effect, and potential cumulative impacts associated with GHG emissions can be considered a state-wide effect. Existing thresholds were developed with this in mind. While construction of the Proposed Project could combine with construction of other projects, cumulative emissions would not likely result in total GHG emissions that could exceed the threshold (note that the Proposed Project's amortized GHG emissions represent less than 1 percent of the GHG threshold of 10,000 metric tons), and any cumulative impacts would not substantially hinder the long-term reduction of GHG emissions within the State of California. Therefore, cumulative effects are less than significant.

Compliance with Adopted GHG Plans, Policies, and Regulations

Construction of the Proposed Project would comply with AB 32 and CARB requirements for the reduction of GHG emissions. Construction emissions were also determined to be below the County of San Diego and SCAQMD's significance threshold for GHG. Therefore, impacts are anticipated to be less than significant. Even if the Proposed Project's effect on compliance with adopted GHG policies and plans were evaluated in combination with the TL 626 and Circuit 222 projects, the combination of these three projects would not likely exceed the significance threshold (note that the Proposed Project's amortized GHG emissions represent less than one percent of the GHG threshold of 10,000 metric tons), and the resulting impacts would not likely substantially hinder the long-term reduction of GHG emissions within the State of California. Therefore, cumulatively considerable adverse effects are not anticipated from construction of the Proposed Project.

4.16.8.3 Biological Resources

The Proposed Project would not have any impacts associated with the following CEQA significance criteria relating to biological resources during construction or operations and maintenance:

- Conflict with local policies and ordinances (Question 4e), and
- Conflict with adopted habitat conservation plans (Question 4f).

In addition, the Proposed Project would not have any impacts during operation and maintenance activities. Therefore, there is no potential for cumulative impacts associated with these significance criteria or operation and maintenance of the Proposed Project. The remaining biological resources-related impacts are discussed below for construction of the Proposed Project.

Construction

Impacts to Protected Species, Habitats, or Species Movement/Migration[1]

Construction of the Proposed Project is anticipated to have less than significant impacts relating to state and federally listed species, protected habitats, and species movement and/or migration. Impacts to native vegetation communities resulting from the construction of power lines, access roads, other support facilities, and temporary construction areas can be cumulatively significant when assessed with other projects in the vicinity. As illustrated in Table 4.16-1, there are four projects that could result in impacts that could be cumulatively considerable when assessed with the Proposed Project, as follows:

- TL 626 project,
- Circuit 222 project,
- Sol Orchard Solar Farm project, and
- Sol Orchard SD-5 (Santa Ysabel) project.

The majority of the Proposed Project's permanent impacts would be limited to areas that are not highly sensitive, with the exception of approximately 0.023 acre of impacts to sensitive habitat (refer to Section 4.4.4.3) including open oak woodland, chaparral, and coastal sage scrub/chaparral mix, and disturbed wetland. The areas of permanent impacts from poles or access roads do not occur all in one place but rather are spread across the length of the power line in locations that are predominantly undeveloped and therefore continue to have substantial acreage of land available for biological resources and wildlife migration despite the Proposed Project's impact.

Cumulative impacts within a region are most effectively minimized by comprehensive plans that address the impacts of regional growth on wildlife and its habitats. SDG&E has developed and implemented a regional, multi-species conservation program within its southern California range, known as the *SDG&E Subregional NCCP*. The *SDG&E Subregional NCCP* was developed in accordance with the California NCCP Act to avoid, minimize, and mitigate for regionally cumulative impacts to biological resources. Impacts to sensitive habitat are fully addressed through the *SDG&E Subregional NCCP*; therefore the Proposed Project's impacts to sensitive

[1] Consistent with the discussion of permanent impacts to vegetation and habitat in Section 4.4, Biological Resources, potential permanent cumulative impacts resulting from construction of new facilities are discussed within the Construction impacts section to provide consistency with implementation of the *SDG&E Subregional NCCP*, which addresses avoidance and minimization measures for biological resources.

habitat would not be significant. Implementation of operational protocols in the *SDG&E Subregional NCCP* would ensure that any other cumulative impacts to biological resources would not be significant. Similarly, all other projects listed in Table 4.16-1 would be required to mitigate any impacts to state and federally listed species and/or habitats through compliance with State and Federal ESAs, CWA, and applicable local habitat conservation plans. Therefore, any impacts to biological resources from other projects listed in Table 4.16-1 would also be mitigated, and as such, cumulatively considerable impacts to biological resources would be less than significant.

4.16.8.4 Cultural Resources

Operation and maintenance of the Proposed Project is not anticipated to have impacts on cultural resources. Therefore, no cumulative impacts would result from this significance criterion or operation and maintenance of the Proposed Project. The remaining cultural resources-related impacts are discussed below for construction of the Proposed Project.

Construction

Construction of the Proposed Project is anticipated to have less than significant impacts relating to cultural and paleontological resources (refer to Section 4.5, Cultural Resources) and less than significant impacts to human remains. The Proposed Project has been designed to avoid known cultural resources and project design features and ordinary construction restrictions (refer to Section 3.8) would ensure that any potential impacts relating to unanticipated discovery would be less than significant. For construction projects that occur within undisturbed soil units, potentially significant impacts to buried cultural resources can occur. Potential impacts can also occur where historic, cultural, and paleontological resources have been identified.

As illustrated in Table 4.16-1, there are four projects that are within a one-mile radius of the Proposed Project and are potentially large enough to have a regionally significant impact. However, impacts to cultural resources are site-specific, and as such are not expected to combine with the development of other projects to cumulatively increase the risk of impacting historic or prehistoric archaeological or paleontological resources or human remains. Potential impacts are evaluated on a case-by-case basis. While the TL 626 and Circuit 222 projects would result in ground disturbance within the immediate vicinity of the Proposed Project, these two projects will also be designed to avoid known cultural resources and would be subject to the same project design features and ordinary construction restrictions as the Proposed Project. As such, the Proposed Project's contribution to cumulative impacts related to cultural resources would be less than significant.

4.16.8.5 Geology, Soils, and Mineral Resources

The Proposed Project would not have any impacts associated with the following CEQA Appendix G significance criteria relating to geology, soils, and mineral resources during construction or operations and maintenance:

- Alquist-Priolo Earthquake Faults (Question 6a[i]), and
- Soils incapable of supporting septic system use (Question 6e).

In addition, as outlined in Section 4.6, Geology, Soils and Mineral Resources, there is only the potential for significant impacts during operation and maintenance of the Proposed Project relating to seismic and geologic hazards. Therefore, potential cumulative impacts for operation and maintenance are limited to seismic and geologic hazards. The remaining geology and soils impacts are discussed below for construction and operation and maintenance of the Proposed Project.

Construction

Seismic and Geologic Hazards

Construction of the Proposed Project is anticipated to have less than significant impacts relating to seismic and geologic hazards (refer to Section 4.6, Geology, Soils, and Mineral Resources). Potential geologic hazards, such as seismic shaking, liquefaction, and landslides, could adversely affect the Proposed Project, as well as most of the projects listed within Table 4.16-1. However, these potential impacts are largely avoided through adherence to project design features and engineering standards, which are generally applicable to all of the projects listed in Table 4.16-1 (note that SDG&E projects are subject to the same standards as private development projects, however, all projects would be designed to account for geologic hazards). Furthermore, construction activities are short-term, and workers are not exposed to potential risks for long periods of time (i.e. only during work hours). Finally, construction activities would not occur at the same site, thereby reducing the probability of multiple construction crews (i.e. from different projects) substantially increasing the number of people exposed to potential risks during construction activities at one location. Therefore, any potential cumulative impacts would be less than significant.

Soil Erosion and Loss of Topsoil

Construction of the Proposed Project would have less than significant impacts relating to soil erosion and loss of topsoil. The following projects could result in similar impacts during construction activities, and are located in close proximity to the Proposed Project:

- TL 626 project,
- Circuit 222 project,
- Sol Orchard Solar Farm project, and
- Sol Orchard SD-5 (Santa Ysabel) project.

While these projects could have impacts relating to soil erosion and loss of topsoil in the immediate vicinity of the Proposed Project, all of these projects (including the Proposed Project) would be subject to NPDES requirements, including the preparation of a SWPPP. Adherence to NPDES requirements and erosion control BMPs included within the SWPPPs would ensure that the cumulative effects from the combined projects would be less than significant.

Operation and Maintenance

Seismic and Geologic Hazards

Operation and maintenance of the Proposed Project is anticipated to have less than significant impacts relating to seismic and geologic hazards (refer to Section 4.6, Geology, Soils, and Mineral Resources). Potential geologic hazards, such as seismic shaking, liquefaction, and landslides, could adversely affect the Proposed Project, as well as most of the projects listed within Table 4.16-1. However, these potential impacts are largely avoided through adherence to design and engineering standards, which are applicable to all of the projects listed in Table 4.16-1. Therefore, any potential cumulative impacts would be less than significant.

4.16.8.6 Hazards and Hazardous Materials

The Proposed Project would not have any impacts associated with the following CEQA significance criteria relating to hazards and hazardous materials during construction or operations and maintenance:

- Hazardous Emissions within one-quarter mile of school (Question 7c),
- Sites listed pursuant to Government Code Section 65962.5 (Question 7d),
- Airport land use plans (Question 7e), and
- Private airstrip safety hazards (Questions 7f).

In addition, as outlined in Section 4.7, Hazards and Hazardous Materials, there is no potential for adverse impacts during operation and maintenance of the Proposed Project.

Therefore, there would be no potential for cumulatively considerable impacts associated with these significance criteria or operation and maintenance of the Proposed Project. The remaining hazards and hazardous materials-related impacts are discussed below for construction of the Proposed Project.

Construction

Routine Transport and Handling of Hazardous Materials and Wastes

The Proposed Project would result in less than significant impacts associated with the routine handling and transport of hazardous materials as well as for potential accident or upset conditions. None of the projects outlined within Table 4.16-1 are likely to involve large-scale utilization of hazardous or acutely hazardous substances (such as chemical plants, refineries, or heavy manufacturing) and as such the possibility of a cumulatively considerable threat from the routine transport or reasonably foreseeable accident or upset conditions involving these hazardous materials is considered to be less than significant. While construction of the two solar farm projects could involve the transportation and use of specialized substances that could exhibit hazardous properties, construction of the two solar projects is not anticipated to overlap with construction of the Proposed Project and therefore no cumulative impacts are anticipated in this regard.

Emergency Response and Evacuation

The Proposed Project would not interfere with any emergency plans. Refer to discussion for cumulative impacts associated with traffic and transportation under Section 4.16.8.10 (Transportation and Traffic) below.

Fire Hazards

Construction of the Proposed Project is anticipated to have less than significant impacts relating to fire hazards (refer to Section 4.7, Hazards and Hazardous Materials). Construction of the Proposed Project through vegetated areas, including areas designated as Very High Fire Threat Zones, could be cumulatively considerable with other projects that would involve construction in the same areas. The projects outlined in Table 4.16-1 are either not located in heavily vegetated areas or are not in the immediate vicinity of the Proposed Project construction areas. With respect to potentially cumulatively considerable impacts resulting from construction of the Proposed Project and the projects outlined in Table 4.16-1, impacts would be less than significant because the two solar projects are not anticipated to be constructed simultaneously with the Proposed Project and the TL 626 and Circuit 222 projects would be subject to the same fire prevention and safety plans, standards, and procedures as the Proposed Project (refer to Section 4.7, Hazards and Hazardous Materials). In addition, because the Proposed Project and TL 626 project are both subject to the discretionary authority of the CPUC, the CPUC could ensure that potentially significant cumulative impacts would not occur, should construction of the two projects overlap, by coordinating with SDG&E to ensure that construction on the TL 626 would not proceed in the immediate vicinity of the Proposed Project while the Proposed Project is under construction. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Therefore, cumulatively considerable impacts are not anticipated with respect to the TL 626 project.

The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in ignition sources would occur; and therefore cumulative fire hazards would not be significant. Upon receipt of any request to have the Proposed Project and the Circuit 222 project constructed at one time, SDG&E project management and Environmental Programs staff for both projects will participate in a construction coordination meeting to ensure that the combined construction activities do not result in cumulatively considerable impacts relating to increased fire hazard. Therefore the potential for increased, cumulative adverse effects relating to fire hazards is considered to be low. Impacts, if any, would be less than significant.

4.16.8.7 Hydrology and Water Quality

The Proposed Project would have less than significant impacts associated with the following CEQA significance criteria relating to hydrology and water quality during construction or operations and maintenance:

- Substantial depletion of groundwater (Question 8b),
- Substantial alteration of existing drainage resulting in flooding (Questions 8d),
- Placement of housing within 100-year flood hazard area (Question 8g),
- Placement of structures within 100-year flood hazard area (Question 8h),
- Exposure of people or structures to flooding (Question 8i), and
- Exposure of people or structures to seiche, tsunami, or mud flow (Question 8j).

In addition, as outlined in Section 4.8, Hydrology and Water Quality, there are no identified impacts during operation and maintenance of the Proposed Project.

Therefore, there would be no potential for cumulatively considerable impacts associated with these significance criteria or with operation and maintenance of the Proposed Project. The remaining hydrology and water quality-related impacts are discussed below for construction of the Proposed Project.

Construction

Stormwater, Erosion and Water Quality

Construction of the Proposed Project would result in less than significant impacts to water quality standards, stormwater, and other water quality. While construction of the Proposed Project has the potential to cause detrimental impacts to water quality, these potential adverse effects are minimized by complying with existing regulations, including NPDES and stormwater control regulations, and by implementing the SWPPP and SDG&E *BMP Manual*.

The projects listed in Table 4.16-1 would have a similar potential to degrade water quality during construction, but these projects would also be subject to existing water quality and stormwater regulations and would also generally be considered to have less than significant impacts on water quality. Pursuant to current project information, only the TL 626 and Circuit 222 projects could have overlapping construction with the Proposed Project. The TL 626 and Circuit 222 projects would include the same water quality, stormwater, and erosion control measures included as part of the Proposed Project, and can thus be expected to result in similar, less than significant impacts. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that any increase in soil disturbance would be minimized, mainly though the shared utilization of construction support land uses such as access roads and staging yards. Therefore the potential for increased, cumulative adverse effects relating to stormwater, erosion and water quality during construction is considered to be low. Impacts, if any, would be less than significant.

None of the projects outlined in Table 4.16-1 would likely involve direct discharges to surface waters that could result in significant adverse effects to surface water quality, although some of the projects could include impacts to jurisdictional features. Regardless, construction of the Proposed Project is not anticipated to result in significant adverse effects to surface water quality. No cumulatively considerable effects are anticipated. Overall, the Proposed Project is not anticipated to contribute to any cumulatively considerable adverse effects on water quality, and, should limited construction overlap occur, impacts are not anticipated to be significant.

Drainage Patterns

Construction of the Proposed Project would not result in substantial effects to the existing drainage patterns in the Proposed Project area. The Proposed Project would result in less than significant effects to 17 jurisdictional features, but would avoid impacting all other features within the Proposed Project area. Impacts are therefore anticipated to be less than significant. The Proposed Project does not involve extensive grading and earth-moving activities that could indirectly effect drainage patterns and flow rates. The Proposed Project does not include new impermeable surfaces that would substantially increase surface flow and would not actually impact existing drainages. While some of the projects listed in Table 4.16-1 could have similar effects to existing jurisdictional waters and/or existing flow patterns, these effects would be localized to each project site. Potential cumulative impacts are anticipated to be less than significant because all of the Projects in Table 4.16-1 that could involve extensive earth-moving activity are not located within the immediate vicinity of the Proposed Project and would not affect the same features as the Proposed Project. The TL 626 and Circuit 222 projects, which have overlapping segments with the Proposed Project, would also not involve extensive grading or earth moving, and would be designed to avoid drainages and other water features wherever feasible. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. No direct impacts to drainages or jurisdictional features are anticipated where the Proposed Project is located in the immediate vicinity of the TL 626 or Circuit 222 projects. The net amount of work in these areas is not anticipated to create cumulatively significant adverse impacts to drainage patterns (including sedimentation effects) as all three projects would be subject to the same controls (e.g. SWPPP and *BMP Manual*), SDG&E projects are designed to avoid areas of significant drainage, and the required grading/earth moving is not extensive. The Proposed Project is therefore not anticipated to substantially contribute to any cumulatively considerable adverse effect on the existing drainage pattern or surface flow.

4.16.8.8 Noise

The Proposed Project would not have any impacts associated with the following CEQA Appendix G significance criteria relating to Noise during construction:

- Exposure to excessive groundborne vibration or noise (Question 10b),
- Substantial permanent increase in ambient noise (Question 10c),
- Effects associated with public airports (Question 10e), and
- Effects associated with private airports (Question 10f).

In addition, as outlined in Section 4.10, Noise, operation and maintenance of the Proposed Project would not result in any noise impacts.

Therefore, there is no potential for cumulative impacts associated with these significance criteria or with operation and maintenance. The remaining noise-related impacts are discussed below for construction of the Proposed Project.

Construction

Generation of Noise and Compliance with Noise Codes

As outlined in Section 4.10, Noise, construction of the Proposed Project would have less than significant impacts relating to noise generation. Construction of the Proposed Project would generate noise, as would the projects outlined in Table 4.16-1 that also involve construction. However, most of the projects outlined in Table 4.16-1 are not located in the immediate vicinity of Proposed Project (i.e. are located greater than 0.3 mile from Proposed Project features) and are therefore not likely to combine with Proposed Project-generated construction noise to create significant adverse effects. While the TL 626 and Circuit 222 projects are partially located in the immediate vicinity of the Proposed Project and have the potential to have construction occur simultaneously with the Proposed Project, construction of the three projects is not currently anticipated to overlap. As proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The majority of the TL 626 project would occur beyond one mile of the Proposed Project and would therefore not combine with the Proposed Project to create cumulatively considerable noise impacts. Where a section of the TL 626 project is common with the Proposed Project, TL 626 shares common structures with TL 637, and thus construction at this location would not be cumulatively considerable because additional noise-generating equipment would not be required.

The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a land owner requested that construction on the Circuit 222 and Proposed Project occur at the same time within their property, SDG&E would limit the combined number of crews and construction equipment such that no net increase in noise generation sources would occur; and therefore potential cumulatively considerable noise effects would be minimized. Upon receipt of a request to have the Proposed Project and the Circuit 222 project constructed at one time, SDG&E project

management and Environmental Programs staff for both projects will participate in a construction coordination meeting to ensure that the combined construction activities do not result in cumulatively considerable impacts relating to construction emissions. In addition, where a portion of the Circuit 222 project is located in the immediate vicinity of the Proposed Project, no potential NSAs are located in close enough proximate to pole sites such that cumulatively considerable noise would result in significant impacts. All potential NSAs near Pole No. P94 (where Circuit 222 crosses TL 637) are located greater than approximately 450 feet from the pole sites. Therefore cumulative adverse impacts relating to noise, if any, would be less than significant.

As outlined in Section 4.10, Noise, construction of the Proposed Project would have less than significant impacts relating to local noise standards and ordinances following implementation of project design features and ordinary construction restrictions (refer to Section 3.8). The TL 626 and Circuit 222 projects would be subject to similar restrictions, and would similarly be anticipated to result in less than significant impacts. As discussed above, construction of the Proposed Project could occur in close proximity to the TL 626 and Circuit 222 projects in limited, specific locations. Where the Proposed Project and the TL 626 project require construction in close proximity to each other (potentially creating a cumulative exceedance of County Noise Codes) the two projects share structures (existing and proposed double circuit structures). Within this area, additional noise-generating equipment would not be required because the area of overlap is limited to one set of poles, which would require the same set of construction equipment as any other single section of power line. In addition, as proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Therefore, cumulative impacts to noise standards and ordinances, if any, would be less than significant.

Where construction of the Circuit 222 project and could occur in close proximity to the Proposed Project (only if requested by the adjacent land owner), the increase in construction equipment would be limited such that no net increase in noise generation sources would occur and the potential cumulative increase in noise levels would be limited. In addition, the area in the immediate vicinity of Pole No. P94 (where the Proposed Project and Circuit 222 project occur in close proximity) does not contain any potential NSAs within approximately 450 feet, thus limiting the potential adverse effect of construction noise. Therefore, cumulatively considerable impacts, if any, would be less than significant.

4.16.8.9 Recreation

The Proposed Project would not have any impacts associated with the following CEQA Appendix G criterion relating to recreation:

- Construction of new or expanded recreational facilities that could result in adverse impacts to the environment (Question 13b).

In addition, as outlined in Section 4.13, Recreation, there is no potential for significant impacts during operation and maintenance of the Proposed Project. Therefore, there is no potential for cumulative impacts associated with these significance criteria or operation and maintenance of

the Proposed Project. The remaining recreation-related impacts are discussed below for construction of the Proposed Project.

Construction

As discussed under Section 4.16.11, the Proposed Project would have less than significant temporary impacts associated with restricted access to certain parks and recreational facilities. However, the projects listed in Table 4.16-1 for the most part would not have similar effects in the same location as the Proposed Project. The TL 626 project would not involve construction within the same parks as the Proposed Project, and thus the two projects would not cumulatively restrict access to any parks. Construction of the Proposed Project and the Circuit 222 project would be coordinated by SDG&E such that construction of the two projects would typically not overlap. However, if a private land owner were to request that SDG&E construct the Proposed Project and Circuit 222 project at the same time, potential impacts at such an area would not be cumulatively significant as construction would be limited to common access points, staging yards, HLZs, and other applicable construction support land uses wherever feasible. Overlapping of direct construction activities (i.e. pole installation and removal) would also be limited to private lands, where public recreational activities typically do not occur. Concurrent construction would also limit the total impact by limiting the number of times construction crews and equipment are present at any given location. Therefore, cumulative impacts associated with restricted access to existing parks and recreational facilities, if any, are anticipated to be less than significant.

4.16.8.10 Transportation and Traffic

The Proposed Project would not have any impacts associated with the following CEQA Appendix G significance criteria relating to transportation and traffic during construction:

- Traffic congestion and LOS (Question 14a),
- Conflict with congestion management plan (Question 14b),
- Increase in design hazard (Question 14d), and
- Impacts to public transit (Question 14f).

In addition, as discussed in Section 4.14, Transportation and Traffic, the Proposed Project would not have any impacts relating to transportation and traffic during operation and maintenance. Therefore, there is no potential for cumulative impacts associated with these significance criteria or operations and maintenance. The remaining traffic and transportation-related impacts are discussed below for construction of the Proposed Project.

Construction

Change in Air Traffic Control Patterns

The Proposed Project would result in less than significant impacts to air traffic patterns due to utilization of helicopters during construction. Three other projects (TL 626, Circuit 222, and the Feral Pig Control projects) could also utilize helicopters during either construction or operation. The Proposed Project, Circuit 222 project, and TL 626 project would utilize light- to medium-

duty helicopters during construction. For the Proposed Project, Circuit 222 project, and TL 626 project, helicopter operators would coordinate with local air traffic control and comply with applicable FAA regulations to prevent any adverse impacts due to increased air traffic. The same is assumed to be true for the Feral Pig Control project, should helicopters be utilized. Therefore, any cumulatively considerable effects are anticipated to be less than significant.

Emergency Access

Construction of the Proposed Project would result in less than significant impacts to emergency access (refer to Section 4.14, Transportation and Traffic). While the TL 626 and Circuit 222 projects could also result in similar impacts, these impacts would not typically be located in close enough vicinity to the Proposed Project for the effects of the two projects to create cumulatively considerable effects on emergency access. In addition, as proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if a private land owner were to request that construction of the Proposed Project and the Circuit 222 project occur simultaneously within their property, within their property, SDG&E would limit the combined number of crews and construction equipment such that any increase in construction traffic and equipment would be minimal. With no net increase in construction crews and equipment, any increase in construction traffic would be limited to support services, such as engineering and environmental monitors. Therefore, any increase in construction traffic would not be anticipated to result in significant cumulatively significant adverse effects on emergency access. Therefore, cumulative impacts to emergency vehicle access, if any, would be less that significant.

4.16.8.11 Utilities and Service Systems

The Proposed Project would not have any impacts associated with the following CEQA Appendix G significance criteria relating to utilities and service systems during construction or operations and maintenance:

- Wastewater treatment requirements (Question 15a),
- New water or wastewater facilities (Question 15b),
- New stormwater facilities (Question 15c),
- Wastewater treatment services (Question 15e), and
- Compliance with solid waste regulations (Question 15g).

In addition, operation and maintenance of the Proposed Project is not anticipated to have any impacts relating to utilities and service systems. Therefore, there is no potential for cumulative impacts associated with these significance criteria or operations and maintenance. The remaining utilities and service system-related impacts are discussed below for construction of the Proposed Project.

Construction

Water Supply

Construction of the Proposed Project will use water, mainly for the purpose of dust control. The Proposed Project will obtain water for dust control and other construction needs from existing local sources by the construction contractors. Both solar projects, the TL 626 project and the Circuit 222 project would also likely require water during construction. The source would likely be local, similar to the source for the Proposed Project. However, only the TL 626 and Circuit 222 projects have the potential to have construction overlap with the Proposed Project. The majority of the TL 626 project would not occur in the immediate vicinity of the Proposed Project, and the water use for the TL 626 and Circuit 222 projects and the Proposed Project would be temporary. In addition, as proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. Finally, SDG&E will ensure that the Circuit 222 project will typically not have overlapping construction with the Proposed Project, and therefore the two projects are not anticipated to result in cumulatively considerable impacts. However, if construction of the Circuit 222 project and the Proposed Project do occur simultaneously pursuant to request by an adjacent land owner, construction activities on Circuit 222 would be limited such that additional water use would not likely be sufficiently large enough to result in a significant increase in demand on local water supply. Therefore, cumulative impacts to water supply, if any, would be less than significant.

Solid Waste and Landfill Capacity

Construction of the Proposed Project would result in less than significant impacts to solid waste (landfill) capacity. While almost of all of the projects listed in Table 4.16-1 would have a similar potential to impact solid waste and landfill capacity, the existing local landfill system has ample capacity for the foreseeable future, and none of the projects listed in Table 4.16-1 would likely result in large amounts of solid waste generation. In addition, only the TL 626 and Circuit 222 projects have the potential to have overlapping construction with the Proposed Project. However, as proposed by SDG&E (based on the current anticipated TL 626 schedule), the anticipated construction schedule for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if construction of the Circuit 222 project and the Proposed Project do occur simultaneously pursuant to request by an adjacent land owner, construction activities on Circuit 222 would be limited such that additional waste generation would not likely be sufficiently large enough to result in a significant degradation of existing landfill capacity (as outlined in Table 4.15-1, the Otay Landfill has an existing capacity of approximately 24.5 million cubic yards). Therefore, cumulative impacts to solid waste and landfill capacity, if any, would be less than significant.

4.16.9 Project Design Features and Ordinary Construction/Operating Restrictions

SDG&E would implement project design features and adhere to ordinary construction and operating restrictions, as outlined in Section 3.8. While the design features and ordinary

restrictions ensure the Proposed Project complies with applicable regulations, ordinances, and standards, they would also avoid significant adverse impacts to the project, public, and environment.

4.16.10 Applicant Proposed Measures

While potentially significant cumulative impacts could occur due to simultaneous construction between the Proposed Project, the TL 626 project, and the Circuit 222 project, the anticipated construction schedule proposed by SDG&E for the Proposed Project (January through September of 2014) would not coincide with the TL 626 project. The CPUC could coordinate with SDG&E to ensure that TL 626 construction activities would not occur in the immediate vicinity of the Proposed Project while the Proposed Project is under construction, thereby avoiding potential cumulatively considerable impacts. The Circuit 222 project involves distribution only, and is located within private lands: therefore the construction schedule can be implemented directly by SDG&E such that overlaps between the Proposed Project and the Circuit 222 project would typically be avoided. However, if an adjacent land owner requests that construction of the Circuit 222 project and the Proposed Project occur simultaneously or in sequence, additional construction equipment and crews will be limited such that no net increase in crews and equipment would result. In addition, construction activities would utilize the same construction support land uses (i.e. access roads, staging areas, and HLZs), and all construction would be performed in compliance with the project design features and ordinary construction and operating restrictions outlined in Section 3.8. Therefore, no potentially significant cumulative impacts are anticipated (refer to Sections 4.16.8.1 through 4.16.8.11 above) and no APMs would be needed in order to ensure impacts are less than significant.

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