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CHAPTER 5 – DETAILED DISCUSSION OF SIGNIFICANT IMPACTS

5.0 INTRODUCTION

In accordance with the Proponent's Environmental Assessment (PEA) Checklist issued by the California Public Utilities Commission (CPUC) on November 24, 2008, this chapter:

- identifies the potentially significant impacts that will result from the construction or operation and maintenance (O&M) of the San Diego Gas & Electric Company (SDG&E) TL674A Reconfiguration & TL666D Removal Project (Proposed Project);
- discusses the alternatives that were evaluated in determining the Proposed Project and the justification for the selection of the preferred alternative; and
- discusses the Proposed Project's potential to induce growth in the area.

5.1 APPLICANT-PROPOSED MEASURES TO MINIMIZE SIGNIFICANT IMPACTS

Based on the findings in Chapter 4 – Environmental Impact Assessment, the Proposed Project is not likely to result in significant impacts to any resource areas after implementation of the applicant-proposed measures (APMs) and SDG&E's Project Design Features and Ordinary Construction Restrictions. SDG&E has identified 17 APMs that will be implemented during construction of the Proposed Project to reduce or avoid impacts. Chapter 3 – Project Description provides the APMs and Project Design Features and Ordinary Construction Restrictions that have been included as part of the Proposed Project.

5.2 DESCRIPTION OF PROJECT ALTERNATIVES AND IMPACT ANALYSIS

5.2.0 Introduction

Sections 15126.6(a) and (f)(2)(A) of the California Environmental Quality Act (CEQA) Guidelines and Assigned Commissioner's Ruling on Application 01-07-004 (dated October 16, 2002) do not require a review of alternatives when a project would not result in significant environmental impacts after mitigation, as is the case with the Proposed Project. However, the CPUC has adopted an "Information and Criteria List" to determine whether project applications are complete. The list specifies the information required from any applicant for a project subject to CEQA. As the lead agency, the CPUC requires that Permit to Construct or Certificate of Public Convenience and Necessity applicants describe a reasonable range of alternatives within the PEA.

This section summarizes and compares the environmental advantages and disadvantages of the Proposed Project and the alternatives considered. In accordance with CPUC requirements, SDG&E evaluated a reasonable range of alternatives that meets most of the Proposed Project objectives. Under CEQA, the intent of analyzing project alternatives is to identify ways to mitigate or avoid the significant effects of the Proposed Project on the environment (Public Resources Code § 21002.1). The discussion of alternatives only needs to focus on the

alternatives to the Proposed Project or the locations that are capable of avoiding or substantially decreasing the significant impacts of the Proposed Project.

This environmental alternative analysis evaluates the No Project Alternative, the Proposed Project, and a Pole-Topping Alternative to the Proposed Project. Each alternative is evaluated for its ability to fulfill the Proposed Project objectives. The alternatives that meet the Proposed Project objectives are further evaluated for their ability to reduce environmental impacts compared to the Proposed Project. Alternatives to the Proposed Project that were evaluated, including the No Project Alternative, are summarized in Section 5.2.3 Alternative Descriptions and Evaluations.

5.2.1 Methodology

CEQA does not provide specific direction regarding the methodology of an alternatives comparison. Resource areas that are generally given more weight in comparing alternatives are those with long-term impacts, such as visual impacts, permanent loss of habitat, or land use conflicts. Impacts associated with construction (i.e., temporary or short-term) or those that are easy to mitigate to a less-than-significant level are considered less important. In order to properly analyze each alternative, SDG&E used the following three-step process:

1. SDG&E determined if each alternative is feasible by evaluating whether the constraints on building the alternative are reasonable, as discussed in CEQA Guidelines Section 15126.6.

2. SDG&E then determined which alternatives attain all or a majority of the Proposed Project objectives.

3. SDG&E evaluated the relative environmental impacts of each alternative for select resource areas. Even though the Proposed Project has no significant unmitigated impacts, SDG&E considered whether an alternative would reduce one or more impacts more than the Proposed Project.

The alternatives to the Proposed Project were analyzed based on their ability to meet the Proposed Project objectives. Because the No Project Alternative did not meet the Proposed Project objectives, no further analysis was conducted. Because the Proposed Project and the Pole-Topping Alternative met both of the Proposed Project objectives, the Pole-Topping Alternative was then assessed to determine its potential environmental impacts relative to the Proposed Project.

5.2.2 Proposed Project Objectives

The overall objectives of the Proposed Project are to facilitate future O&M of the transmission system in the Del Mar Substation Area, as well as address the North American Electric Reliability Corporation (NERC) reliability violations associated with the current line. Specifically, the Proposed Project has the following two objectives:

- Objective 1: Address Safety, Environmental, and Reliability Concerns in the Del Mar Substation Area

- Objective 2: Meet Mandatory NERC Reliability Criteria in the Del Mar Substation Area

Each of these Proposed Project objectives is more thoroughly described in Chapter 2 – Project Purpose and Need.

An analysis of each alternative's ability to meet Proposed Project objectives follows. In addition, the Pole-Topping Alternative's potential for environmental impacts relative to the Proposed Project is discussed.

5.2.3 Alternative Descriptions and Evaluations

No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision-makers can compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project (CEQA Guidelines § 15126.6[e]). Under the No Project Alternative, the proposed power line removal would not be implemented and the three power lines would not be converted to underground configurations. If the existing power lines are not removed, SDG&E will continue to have to secure permits from various resource agencies in order to conduct maintenance work within the environmentally sensitive areas (ESAs) where the line is located. Further, access in some areas may be restricted due to eroded cliffs and residential development. Due to these restrictions, SDG&E cannot always complete mandatory maintenance, as required by CPUC General Order 165.

SDG&E is required to abide by NERC reliability standards, as required by the Energy Policy Act of 2005, and mitigate any violations. As described in Chapter 2 – Project Purposes and Need, SDG&E has identified thermal violations on TL666D under its current configuration. To mitigate this violation and avoid future violations, the network serving this area must be upgraded to meet NERC planning criteria.

Under the No Project Alternative, the safety, environmental, and reliability concerns described in Objective 1 would not be addressed as the existing facilities would continue to be located in ESAs and would continue to require difficult ongoing maintenance. Further, the mandatory NERC reliability criteria would not be met in the Del Mar Substation Area. Because the No Project Alternative would not satisfy either of the Proposed Project objectives, it was not considered further.

Proposed Project

The Proposed Project will remove TL666D from service and will also reconfigure TL674A, renaming it TL6973 (North City West-Del Mar Tie Line). This configuration will increase reliability within the Del Mar Substation Area by eliminating two to three terminal transmission lines on TL674 (Rancho Santa Fe Tap) and on TL666 (Del Mar Tap). This configuration will also enhance system reliability by relocating existing overhead infrastructure underground, and removing it from ESAs that are challenging to access and maintain.

The Proposed Project will involve the removal of approximately six miles of existing overhead 69 kilovolt (kV) power line (i.e., TL666D) between the existing Del Mar Substation and an existing steel pole near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive in the

City of San Diego. The poles associated with TL666D will be removed from service or topped, leaving the underbuilt distribution in place.[1] To remove TL666D from service, a 69 kV power line (i.e., TL674A) will be reconfigured, extended to the Del Mar Substation, and renamed as TL6973. In addition, two portions of separate, existing 12 kV distribution lines will be converted from an overhead configuration to an underground configuration.

The Proposed Project will meet both of the Proposed Project objectives as it addresses the safety, environmental, and reliability concerns in the Del Mar Substation Area by removing TL666D. Portions of this line are located in ESAs, including the San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Natural Reserve Extension. Removing these facilities will remove the environmental impacts associated with working in the ESAs. The Proposed Project will also mitigate the NERC reliability violations described in Chapter 2 – Project Purpose and Need. This will be accomplished by using the San Marcos to Escondido transmission line to deliver load to the Del Mar Substation area, allowing SDG&E to necessary operational flexibility to take an outage on TL666D or TL674C while still maintaining flow and avoiding a NERC violation.

Pole-Topping Alternative

A portion of the poles that support TL666D that would be removed from service as part of the Proposed Project .has existing third-party telecommunication lines collocated on them. The Pole-Topping Alternative involves removing TL666D and removing only the top portions of the poles that support third-party telecommunication lines. As a result, the topped poles would remain in place to support the existing telecommunication facilities that are currently underbuilt below TL666D.

The Pole-Topping Alternative would meet both of the Proposed Project objectives as it addresses the safety, environmental, and reliability concerns in the Del Mar Substation Area by removing TL666D from ESAs; thus, future access by SDG&E would not be required in these locations. This alternative would also mitigate the NERC reliability violations described previously in the same way the Proposed Project will.

From an environmental standpoint, however, the Pole-Topping Alternative would provide fewer environmental benefits than the Proposed Project as this alternative would remove fewer poles associated with TL666D than the Proposed Project. Though the poles would be shortened under this alternative, they would still remain an aboveground feature in the coastal zone. By comparison, the Proposed Project will remove these poles, offering a greater benefit to the aesthetics of the area.

5.2.4 Conclusion

The No Project Alternative and the Pole-Topping Alternative to the Proposed Project were evaluated against the Proposed Project objectives. The No Project Alternative was evaluated and rejected based on its inability to meet all of the Proposed Project objectives. The Proposed Project was selected as the preferred alternative because it is feasible, meets all of the Proposed

[1] An underbuilt distribution line is collocated with and installed below a higher voltage power line.

Project objectives, and results in a greater environmental benefit compared to the Pole-Topping Alternative.

5.3 GROWTH-INDUCING IMPACTS

CEQA requires a lead agency to review and discuss ways in which a project could induce growth. The CEQA Guidelines (§ 15126.2[d]) consider a project to be growth-inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding area. New employees hired for proposed commercial and industrial development projects and population growth resulting from residential development projects represent direct forms of growth. Other examples of growth-inducing projects are the expansion of urban services into previously undeveloped areas or the removal of major obstacles to growth, such as transportation corridors and potable water supply.

The growth-inducing potential of the Proposed Project could be considered significant if it would stimulate human population growth or a population concentration in the cities of San Diego or Del Mar or other surrounding communities above the levels assumed in local and regional land use plans or in projections made by regional planning authorities. Significant growth impacts could also occur if the Proposed Project would provide infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies. Because the Proposed Project will not increase housing, bring in new services, or improve the existing infrastructure system (with the exception of facilitating future maintenance and addressing NERC reliability criteria), it will not stimulate population growth or result in a new concentration of residents, businesses, or industries.

5.3.0 Growth Caused by Direct and Indirect Employment

The construction and O&M of the Proposed Project will not affect employment patterns in the area. SDG&E will employ an average of approximately 45 workers throughout the 12-month construction period. During the peak construction period, up to 125 workers may be employed. The workers will consist of existing SDG&E employees and contract workers. The majority of construction workers are anticipated to come from San Diego County and will not require lodging. In addition, O&M of the Proposed Project will be performed by current SDG&E employees, and therefore will not create new jobs.

5.3.1 Growth Related to the Provision of Additional Electric Power

The population of San Diego County has increased every year since 1944. As a result, growth is part of the past, present, and expected future of the region. The San Diego Association of Governments (SANDAG) is the regional planning entity for the San Diego region and is composed of representatives from 18 cities and the county government. SANDAG serves as the forum for regional decision-making. It makes strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life.

The cities and county have designated SANDAG as the regional planning board, pursuant to a voter-approved proposition. The cities and county provide SANDAG with information about their general plans, local growth patterns, and land use regulations. In return, SANDAG generates regional management plans and population forecasts. As members of SANDAG, the

cities and county review and approve all plans and forecasts prepared by SANDAG. The cities and county use SANDAG's findings to develop and shape their respective general plans and land use regulations. Each city and the county are required to adopt a general plan, which must be updated on a regular basis. All general plans and subsequent amendments are subject to CEQA review.

SANDAG prepared a Regional Comprehensive Plan (RCP) in 2004 to provide policy guidance on accommodating the growth projected by SANDAG. A key element of the RCP is the Integrated Regional Infrastructure Strategy (IRIS), which outlines guidance for planning the region's infrastructure. The goal of the IRIS is to ensure internal consistency with respect to long-term regional infrastructure planning to meet the needs of the growth projected by SANDAG. The IRIS addresses the energy supply and delivery system as key infrastructure elements. As the primary utility that provides electric service to approximately 3.4 million people using approximately 1.4 million meters in its service area,[2] SDG&E participates in and supports this aspect of the planning process. SANDAG has been preparing long-range forecasts of population, housing, and employment since the 1970s. SANDAG's forecasts represent the changes anticipated for the region based on the best available information. The forecast is produced by using established computer models that evaluate land use, demographics, regional and local economics, and transportation patterns. The SANDAG forecasts utilize a complex set of assumptions, input data, computations, and model interactions.

The latest Regional Growth Forecast (RGF) was developed for 2050 and provides an update of expected growth from the previous model that was developed for 2030. The 2050 RGF is based on data from the 2008 estimate produced by the California Department of Finance, plus updated information for all model inputs.

The 2050 RGF predicts that economic growth and local population will continue at a steady rate through 2050, although at a slightly slower rate than in the previous 40 years. These updated projections suggest that the region will approach 4.4 million residents, 1.9 million jobs, and 1.5 million housing units by 2050.

SANDAG does not use energy as a driver of growth; however, its regional growth model recognizes the investment in energy infrastructure as necessary to support the implementation of the RCP. SDG&E coordinates with SANDAG to address this component of its regional planning process. Only local government entities with jurisdiction over land use approvals can either directly cause or prevent growth. How and where development occurs within SDG&E's service area is dictated by the land use agencies with this authority. SDG&E responds to such development.

5.3.2 Proposed Project and Growth

The objectives of the Proposed Project are to address safety, environmental, and reliability concerns in the Del Mar Substation Area; and to meet mandatory NERC reliability criteria in the Del Mar Substation Area. The Proposed Project will remove facilities that are located in ESAs to facilitate access for maintenance and address the NERC reliability violations identified.

[2] SDG&E's service area includes all of San Diego and the southern part of Orange County.

Furthermore, the Proposed Project will not create a new service or source of power that will indirectly allow for an increase in population or housing as a result, as it will not extend infrastructure into previously unserved areas. Therefore, the Proposed Project will not induce population growth in the area.

5.4 REFERENCES

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