6.0 OTHER CONSIDERATIONS

This section analyzes the potential for the Proposed Project to cause or contribute to significant cumulative effects when the impacts of projects listed in Table 6.1, Cumulative Projects Located in the Vicinity of the West of Devers Upgrade Project, are considered together with the impacts of the Proposed Project.

The cumulative Project Study Area includes the cities of Banning, Beaumont, Calimesa, Colton, Desert Hot Springs, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, and Yucaipa, and unincorporated areas of Riverside and San Bernardino counties. The Proposed Project component in the City of Rancho Cucamonga is limited to improvements within the Mechanical Electrical Equipment Room (MEER) at Etiwanda Substation. The extent of this work within an existing facility would not have the potential to affect resources in the City of Rancho Cucamonga; therefore, the City of Rancho Cucamonga is not included for further discussion.

For the purposes of this section, the Project Study Area is defined as the area encompassing all of the following: (1) all project components, including substation modifications, 220-kilovolt (kV) transmission lines, 66 kV subtransmission lines, 12 kV distribution lines, telecommunication facilities, and the establishment of staging yards; and (2) one mile from centerline on each side for a total buffer width of 2 miles. The buffer width allows for documentation of projects in the vicinity of the Proposed Project to address the potential for cumulative impacts to the environment resulting from the incremental impact of the Proposed Project combined with the effects of other past, present, and reasonably foreseeable future projects. The Path 42 Upgrade Project is a cumulative energy project that is located entirely outside the cumulative study area.

6.1 Cumulative Impacts

California Environmental Quality Act (CEQA) requires lead agencies to consider the cumulative impacts of proposals under their review. Section 15355 of the CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact "consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." §15130(a)(1). The cumulative impacts analysis "shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to significant cumulative effects." § 15130(b)(5).

Section 15130(a)(3) also states that an environmental document may determine that a project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund its fair share of mitigation measure(s) designed to alleviate the cumulative impact. § 15130(a)(3).

In conducting a cumulative impacts analysis, impacts are referenced to the temporal span and spatial areas in which the Proposed Project would cause impacts. Additionally, a discussion of cumulative impacts must include either: (1) a list of past, present, and probable future projects, including, if necessary, those projects outside the control of the lead agency; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect, provided that such documents are referenced and made available for public inspection at a specified location. § 15130(b)(1).

According to the Council on Environmental Quality (CEQ) regulations (40 C.F.R.§ 1508.7), a cumulative impact under NEPA, "is the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions."

Cumulative impact analysis for the Proposed Project included a review of developments within approximately 1 mile of all Proposed Project components. These developments are shown in Figure 6.1, Cumulative Projects, and are listed in Table 6.1, Cumulative Projects Located in the Vicinity of the West of Devers Upgrade Project.

Project	Project Description	Location	Segment	Construction Schedule
City of Banning				-
Butterfield Specific Plan ¹	Specific Plan community with 5,387 dwellings	North of Wilson Street and east of Highland Springs Road	4	Approved in 2012
Fiesta Development ¹	303 dwellings	North of Wilson Street and west of Mountain Avenue	4	Approved in 2007
St. Boniface/Gilman Project ¹	172 dwellings	North of West Gilman Street and west of Wyte Way	4	Approved in 2007
O'Donnell Industrial Park ¹	1.2 million sf industrial	I-10 at Hathaway Street	5	Approved
Hoffer Street ²	AC Overlay	Alessandro Road to Hargrave Street	5	2013–2014
Cherry Street ²	AC Overlay	Hoffer Street to George Street	5	2014–2015
Allen Street ²	AC Overlay	Hoffer Street to George Street	5	2015–2016
City Wide Slurry Seal ²	Slurry Seal	City of Banning	4 and 5	2014–2016
City of Beaumont				-
Tournament Hills ³	1,327 dwellings	Southwesterly of Desert Lawn Drive and north of San Timoteo Canyon	4	1,094 under construction; 233 approved
Sundance ³	Specific Plan community with 4,716 dwellings	North of 8 th Street and west of Highland Springs Avenue	4	Under construction
Fairway Canyon ³	Specific Plan community with 3,566 dwellings	North of San Timoteo and southwest of I-10	4	Under construction

Project	Project Description	Location	Segment	Construction Schedule
Aspen Creek ³	106 single-family homes	East of Manzanita Park Road and north of First Street	4	Under construction
American Center ³	3,075 sf shopping center	1302 East 6 th Street	4	Under construction
Dowling Orchard Business Park ³	Phase 2,600,000 sf warehouse	4 th Street at Nicolas Road	4	Under construction
Farmer Boys ³	27,000 sf commercial	1538 Second Street Marketplace	4	Approved
Ramona Tire ³	19,200 sf commercial	1488 Second Street Marketplace	4	Under construction
Family Dollar ³	8,320 sf commercial	649 East 6 th Street	4	Under construction
Pacific Scene ³	95 single-family homes	South of Potrero Boulevard and west of Manzanita Park Road	4	Approved
Noble Creek Vistas ³	648 single-family homes	North of Oak Valley Parkway and west of Beaumont Avenue	4	Approved
Sunny-Cal Specific Plan ³	571 single-family homes and 439,000 sf commercial	East of SR-60 between Cherry Valley and Brookside Avenue	4	Approved
American Villas ³	36 single-family homes	693 West American Avenue	4	Approved
8 th Street Condos ³	16 condominiums	1343 East 8 th Street	4	Approved
Pennsylvania Avenue Apartments ³	8 apartments	850 Pennsylvania Avenue	850 Pennsylvania 4 Appr	
Beaumont Commons ³	120 apartments	Xenia between 6 th and 8 th Streets	4	Approved

Project	Project Description	Location	Segment	Construction Schedule
Tuscany Townhomes ³	188 condominiums	Xenia and 8 th Street	4	Pending
Oak Valley Senior Center ³	372 apartments	Northwest corner of Oak Valley Parkway and Oak View Drive	4	Pending
Mountain Bridge	1.66 million sf commercial	South of Oak Valley Parkway and east of I- 10	4	Approved
Hidden Canyon	2.89 million sf of warehouse/distribution	South of SR-60 and east of Jack Rabbit Trail	4	Approved
Heartland ³	Specific Plan community with 922 dwellings	North of SR-60 and west of Potrero Boulevard	4	Under construction
Kirkwood Ranch ³	Specific Plan community with 103 dwellings	North of I-10 and south of Oak Valley Parkway	4	Approved
O'Reilly Auto Parts ³	8,000 sf commercial	Second Street Marketplace	4	Pending
North of Sundance Residential ³	26 single-family homes	Brookside and Highland Springs	4	Pending
City of Calimesa				
Summerwind Ranch ⁴	Community of 3,683 dwellings, schools, business park, and regional retail	West of I-10 at Cherry Valley Boulevard	3 and 4	Approved 2007
City of Colton				
Iron Horse Hills ⁵	186 dwellings	South of Hilltop Drive and east of Barton Road	2	Approved in 2006
City of Desert Hot Spri	ngs			
None within Study Area				

Project	Project Description	Location	Segment	Construction Schedule
City of Grand Terrace				
DeBerry Street ⁶	Pavement resurfacing	Michigan Avenue to Observation	2	2012–2014
Barton Road ⁶	Pavement resurfacing	Vivenda Court to Mt. Vernon Avenue	2	2014–2015
Glendora Drive ⁶	Pavement resurfacing	From Barton Road	2	2016-2017
Minona Drive ⁶	Pavement resurfacing	From Mt. Vernon Avenue	2	2016–2017
City of Loma Linda				
Redlands Boulevard/ California Street ⁷	Intersection improvements	Redlands Boulevard at California Street	1	2013–2014
California Street/ Orange Avenue ⁷	Install traffic signal	California Street at Orange Avenue	1	2014–2015
California Street/Citrus Avenue ⁷	Install traffic signal	California Street at Citrus Avenue	1	2014–2015
City of Palm Springs	·	·		
Whitewater Solar Farm ⁸	18-acre, 3 MW facility	58641 Tipton Road	6	Pending, not approved
BP Fuel Storage ⁸	6,200 sf distribution center	18600 Halleck Road	East of Segment 6	Approved, on hold
City of Redlands			•	
Industrial Park ⁹	880,118 sf industrial	East of Research Drive between Almond and Lugonia	1	Unknown (information as of 2012)
Warehouse ⁹	500,000 sf warehouse	North of San Bernardino Avenue and east of California Street	North of Segment 1	Unknown (information as of 2012)
Citywide Road Resurfacing ¹⁰	Resurfacing	City of Redlands	1, 2, and 3	2013

Project	Project Description	Location	Segment	Construction Schedule
City of San Bernardino				
Central Avenue/ Southgate Warehouse ¹¹	2.75 million sf warehouse and distribution	East of Tippecanoe Avenue at Central Avenue	North of Segment 1	Approved 2012
City of Yucaipa				
No projects within 1 mile of transmission line ¹²				
County of Riverside		·		
Brookside Avenue street improvements ¹³	Pavement resurfacing	Beaumont Avenue to 0.11 mile east of Beaumont Avenue	4	2013
Highland Springs Road ¹³	Pavement resurfacing	17 th Street to Cherry Valley Boulevard	4	2013–2014
I-10 Bypass ¹³	Widen from two to four lanes from Hargrave Street to I-10 and construct two lanes from I-10 to Fields Road	Hargrave Street to Fields Road near Banning	5	2015 or later
Main Street ¹³	Pavement resurfacing	Railroad Avenue to Seminole Drive near Cabazon	5	2012–2013
San Timoteo Canyon Road ¹³	Widen roadway to provide bike lanes	Beaumont City Limit north 2.5 miles to Lake Drive	3 and 4	2012–2013
San Timoteo Canyon Road ¹³	Pavement resurfacing	Live Oak Canyon Road north 0.23 mile to county line	3	2012–2013
San Timoteo Canyon Road ¹³	Pavement resurfacing	Beaumont City Limit north to Redlands Boulevard	3	2013–2014

Project	Project Description	Location	Segment	Construction Schedule
Seminole Drive ¹³	Pavement resurfacing	Apache Trail to Main Street	5	2013–2014
Worsley Road ¹³	Pavement resurfacing	Dillon Road to Pierson Boulevard	6	2013–2014
County of San Bernard	dino		•	
Reche Canyon Road Widening ¹⁴	One additional northbound lane	Westwood Street to north of Placid Lane	2	May 2013
Regional Projects				
I-215/Mt. Vernon- Washington Interchange ¹⁵	Realign on- and off-ramps	Mr. Vernon Avenue at I-215	2	2013–2016
I-215/Barton Road Interchange ¹⁵	Widen bridge	Barton Road at I-215	West of Segment 2	2013–2015
I-215 HOV lanes ¹⁵	Add HOV lane in each direction	SR-91/SR-60 interchange to Orange Show Road in San Bernardino	2	2013–2015
I-10/Cherry Valley Interchange ¹⁵	Widen bridge and ramps	Cherry Valley at I-10 in Calimesa	4	2015–2016
I-10/Oak Valley Interchange ¹⁵	Widen bridge, realign and widen ramps	Oak Valley Parkway at I-10 in Beaumont	4	2015–2016
SR-60/Potrero Boulevard Interchange ¹⁶	Provide full access to SR-60	Potrero Boulevard at SR-60 in Beaumont	4	2013–2015
Path 42 Energy Project	Upgrade of two 230 kV transmission lines: the Devers-Mirage No. 1 230 kV transmission line and the Devers-Mirage No. 2 230 kV transmission line between SCE's Devers 230 kV and Mirage 230 kV	Riverside County, north of the Project Study Area	Not Applicable	2014 (Construction Completion)
	substations.			2015 (In service)

Project	Project Description	Location	Segment	Construction Schedule
West of Devers Interim Project	Installation of twelve series reactors on the 220 kV transmission lines exiting Devers Substation, installation of six new 220 kV tower structures, installation of fifteen new 115 kV pole structures, removal of two existing tower structures, and rerouting of existing telecommunication lines into Devers Substation.	On and adjacent to Devers Substation	6	Constructed 2013

¹ Butterfield Specific Plan Draft Subsequent EIR (June 3, 2011).

² Measure "A" Five Year Capital Improvement Plan 2012/13 – 2016/17, City of Banning.

³ Major Project Status as of September 1, 2012, City of Beaumont.

⁴ City of Calimesa Planning Division. Retrieved March 28, 2013, http://www.cityofcalimesa.net/planning.htm.

⁵ City of Colton Agenda Report for Council Meeting of December 18, 2007 (December 12, 2007).

⁶ City of Grand Terrace Five Year Capital Improvement Plan 2012-2017.

⁷ City of Loma Linda Capital Improvement Program 2010-2015.

⁸ City of Palm Springs Development Projects Update, May 30, 2013.

⁹ Redland Crossing Center Draft EIR, Michael Brandman Associates (Approved October 2012).

¹⁰ City of Redlands Fiscal Year 2012-2013 Adopted Budget.

¹¹ Addendum No. 3 and Consistency Evaluation Final Environmental Impact Report San Bernardino Alliance California Specific Plan, LSA, June 1, 2012.

¹² City of Yucaipa Annual Budget 2012-2013, 7 Year Draft Capital Improvement Program.

¹³ Transportation Improvement Program 2012-2013 Edition, Riverside County Transportation Department.

¹⁴ 2012-13 Recommended Budget, Capital Improvement Program, County of San Bernardino.

¹⁵ San Bernardino Associated Governments. Retrieved April 18, 2013, http://sanbag.ca.gov/projects/.

¹⁶ State Route 60/Potrero Boulevard New Interchange Project Fact Sheet. Retrieved April 18, 2013, http://www.ci.beaumont.ca.us/DocumentCenter/Home/View/15496.

AC = asphalt concrete	MW = megawatt(s)
HOV = high-occupancy vehicle	sf = square feet
I-10 = Interstate 10	SR-60 = State Route 60
I-215 = Interstate 215	SR-91 = State Route 91

6.1.1 Significance Criteria

The CEQA Environmental Checklist provides significance criteria for assessing the cumulative impacts of the Proposed Project. A project causes a potentially significant cumulative impact if the project has impacts that are individually limited, but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. See CEQA Guidelines Section 15064(h)(1).

6.1.2 Impact Assessment

This section discusses the potential cumulative impacts of the Proposed Project for each environmental resource category.

6.1.2.1 Aesthetics

Implementation of the Proposed Project would result in permanent visual changes within the Project Study Area, including the replacement of existing 220 kV, double-circuit transmission structures with new, taller double-circuit structures, installation of transmission lines, telecommunications infrastructure, potential Federal Aviation Administration (FAA) marker balls and lighting, construction of new access roads, relocation of subtransmission and distribution lines, and substation modifications. The Proposed Project would be located within viewsheds where numerous existing utility structures are established features in the landscape setting. A comparison between the set of Key Observation Point (KOP) existing views and corresponding simulation images included in Section 4.1, Aesthetics, demonstrates that the Proposed Project would not substantially change the existing landscape character found within these viewsheds. Therefore, the Project Study Area's existing visual character, distinguished by features associated with urban and suburban communities in Segments 1 and 2, and with rural areas and rural communities in Segments 3, 4, 5, and 6, would not be substantially transformed by the Proposed Project.

The cumulative projects described above include projects distributed throughout the 48mile corridor. Many of the projects are small in scale and/or not located adjacent to the corridor. The exceptions are the West of Devers Interim Project and the land development projects in the Segment 4 portion of the Project Study Area. The West of Devers Interim Project is expected to be completed this year and includes the installation of a series of reactors on the four 220 kV transmission lines that extend westward of the Devers Substation, and a Special Protection System. The new and relocated facilities are installed within SCE property and transmission ROW, and will be removed after the completion of the Proposed Project. Therefore, the West of Devers Interim Project will not result in long-term changes to the environmental setting. The land development projects in Segment 4 (such as the Butterfield Specific Plan, the Noble Creek Vistas Project, and Summerwind Ranch) represent the potential for development of approximately 1,000 residences or more and other land uses in areas adjacent to the Proposed Project. Land development in Segment 4 could result in notable changes to the existing environmental setting.

When considered in conjunction with other potential development projects in the vicinity (1 mile) of the Proposed Project, the incremental impact of the Proposed Project improvements, including the replacement of existing 220 kV transmission towers and lines, would not substantially change the visual character of the existing environment and would not substantially degrade the character of the viewshed. The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.2 Agricultural Resources

As presented in Section 4.2, Agricultural Resources, construction and operation of the Proposed Project would not significantly affect lands currently designated as Important Farmland; would have no impact on forest or timberlands or a Williamson Act contract; would not result in the loss or conversion of forest land; and would not change the existing environment in a manner that would result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the Proposed Project would not contribute to cumulative effects for these criteria.

Construction and operation of the Proposed Project would result in the permanent conversion of approximately 3.5 acres of lands identified as Important Farmland (2.0 acres of Prime Farmland, 0.7 acre of Farmland of Statewide Importance, and 0.8 acre of Unique Farmland). These conversions would represent a loss of 0.002 percent of the approximately 220,713 acres of Important Farmland identified in San Bernardino County and Riverside County. The conversion of this small amount of farmland would not contribute to a cumulatively considerable impact to agricultural lands in either San Bernardino County or Riverside County. Most of the cumulative projects are not located on designated Important Farmland. The cumulative projects described above are located on approximately 63 acres of designated Important Farmland (although actual impacts to designated Important Farmland may be less). Even with the potential conversion of 63 acres of Important Farmland as a result of the cumulative projects listed above, the Proposed Project contribution would not be cumulatively considerable. The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.3 Air Quality

The cumulative study area for air quality is the South Coast Air Basin and the Salton Sea Air Basin. Construction of the Proposed Project would result in emissions that exceed South Coast Air Quality Management District (SCAQMD) emissions thresholds for carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Construction of some of the projects listed in Table 6.1, Cumulative Projects Located in the Vicinity of the West of Devers Upgrade Project, and other projects in the South Coast Air Basin, may occur during the 36- to 48-month

construction period for the Proposed Project. These concurrent construction activities would result in cumulatively considerable net increases in CO, VOC, NO_X , PM_{10} , and $PM_{2.5}$ emissions. Compliance with Applicant Proposed Measures (APMs) APM-AIR-1 and APM-AIR-2 would reduce project-related impacts, but these impacts would remain significant and unavoidable. Combined with the construction impacts from other projects in the vicinity and in the South Coast Air Basin and Salton Sea Air Basin, the Proposed Project's contribution to cumulative impacts from these emissions would also be significant.

Operation of the Proposed Project would have a less than significant impact to air quality. During operation of the Proposed Project, emissions would be primarily those produced from vehicles (including helicopters) during occasional site visits for routine maintenance and emergency repair. These intermittent visits would not contribute significantly to cumulative air quality impacts during operation of the Proposed Project. The Proposed Project's contribution to any cumulative operation impacts would not be cumulatively considerable and would be less than significant.

6.1.2.4 Biological Resources

For purposes of the cumulative impacts discussion, biological impacts of the Proposed Project are divided into several categories: 1) riparian/riverine/wetland habitats; 2) endangered or threatened species and designated critical habitat; 3) upland habitat for special-status species; 4) wildlife movement; and 5) adopted habitat conservation plans.

Riparian/Riverine/Wetland Habitats. Under existing State and Federal regulations, direct physical impacts to virtually all water bodies are subject to the regulatory authority and jurisdiction of some combination of either the United States Army Corps of Engineers (USACE), and/or the California Department of Fish and Wildlife (CDFW) and/or the local Regional Water Quality Control Board (RWQCB). In accordance with existing programs and policies, agency policies support avoiding any net loss of area or function of regulated waters, and may require mitigation ratios in excess of 1:1 to offset direct impacts to these resources. Assuming that the projects that are listed above comply with regulations from USACE or CDFW and RWQCB, avoidance and minimization measures set forth by these agencies would be implemented to reduce potential impacts.

In addition, for projects covered by the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) or Coachella Valley Multiple Species Habitat Conservation Plan (CV-MSHCP), the WR-MSHCP includes provisions for the conservation of riparian/riverine and vernal pool habitats and the CV-MSHCP provides for the conservation of wetland communities. Measures required under these conservation plans to compensate for impacts to wetland communities, riparian/riverine areas, and vernal pool habitat within the MSHCP planning areas, should SCE apply and obtain status as a Participating Special Entity (PSE) under either or both MSHCPs (in concert with compliance with permit conditions from regulatory agencies), would be sufficient to offset the cumulative impacts of the Proposed Project. Therefore, although other projects considered in the cumulative impacts analysis may also affect water bodies in the vicinity of the Proposed Project, the Proposed Project would not contribute to cumulatively significant impacts to these resources.

Endangered or Threatened Species and Designated Critical Habitat. Three species of animals that are federally- or State-listed as threatened or endangered and no threatened or endangered plant species were identified in the Project Study Area. The focused surveys conducted for the Proposed Project indicate that the three listed animal species, desert tortoise, least Bell's vireo, and Stephens' kangaroo rat, are only sparsely distributed in limited areas subject to potential project effects, but more concentrated occurrences were not found within the potential project impact area. With implementation of the applicant proposed measures, the Proposed Project's impacts to these species are expected to be avoided or minimized to less than significant levels.

Desert tortoise is a covered species under the CV-MSHCP and least Bell's vireo and coastal California gnatcatcher (discussed below) are covered species in the WR-MSHCP. Both MSHCPs are designed to provide for the conservation and recovery of these species within their respective planning areas. The WR-MSHCP and CV-MSHCP both recognize linear utility projects as having potential impacts within the planning area. Thus, the measures required to compensate for impacts to such species within each MSHCP planning area is sufficient to offset the cumulative impacts of the Proposed Project. Furthermore, outside the limits of the MSHCPs and HCP planning area, and with regard to the project's potential cumulative impacts to Stephens' kangaroo rat, as well as desert tortoise, least Bell's vireo, and to the coastal California gnatcatcher and its critical habitat, such impacts are regulated by the USFWS and CDFW pursuant to the take prohibitions of the Federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA), as well as the Section 7 consultation provisions of FESA.

The only designated critical habitat within the Project Study area and the area of cumulative impact analysis that does not lie within the planning areas of the MSHCPs is the coastal California gnatcatcher critical habitat in Segment 2. Surveys for the species conducted in this portion of the Proposed Project Study Area in 2012 and again in 2013 were negative. One large project identified above, the Iron Horse Hills Specific Plan area, coincides with a substantial portion of the critical habitat unit that the existing WOD corridor traverses. Although precise information on the effects on coastal California gnatcatcher occupation of this critical habitat area, south of the Proposed Project Study area. Assuming that the Iron Horse Hills development would comply with regulations from USFWS, avoidance and minimization measures would be implemented to reduce potential impacts.

The Proposed Project is essentially along the northern edge of this critical habitat unit, which is the northernmost critical habitat for coastal California gnatcatcher in San Bernardino County. As a result, the Project Study Area does not occupy a critical link between otherwise separated habitat areas for coastal California gnatcatcher. The relatively short-term construction schedule and linear nature of the project is such that California gnatcatcher movement through the Project Study Area would not be

significantly affected and the value of the surrounding habitat for use by the species would not be substantially reduced. Therefore, while there would be cumulative impacts to designated critical habitat for coastal California gnatcatcher, these impacts are not substantial in the context of the entire critical habitat designation or the overall function and value of this critical habitat unit, and the Proposed Project contribution to these cumulative impacts would not be considerable or substantially adverse.

Designated critical habitat for southwestern willow flycatcher occurs approximately 150 feet from the Proposed Project and may be temporarily affected during installation of overhead telecommunications lines (although these would be located on the opposite side of San Timoteo Canyon Road from the designated critical habitat). Critical habitat for Coachella Valley milk-vetch occurs along and within the banks of the Whitewater River, and may also be subject to temporary impacts due to placement of guard structures. The short-term and temporary work on the telecommunication lines and the potential temporary placement of guard structures is not expected to adversely impact the value of the critical habitat for either species or contribute to cumulative impacts in the region. Neither species was identified in the Proposed Project Study Area during focused surveys conducted in 2012.

Upland Habitat for Special-Status Species. The Proposed Project traverses a variety of upland habitats that support associated special-status species in addition to the threatened and endangered species discussed above. The long-term viability of these species is directly related to the long-term preservation of their various habitats, and this long-term habitat preservation in exchange for permitted development in less important areas is a central tenet of the MSHCPs that include most of the Project Study Area. The footprint of impacts associated with the transmission line consists of widely spaced, relatively small areas associated with facilities and the related access roads. The configuration of Proposed Project impacts results in a lower level of edge effects when compared to a comparable area of development, as the habitat adjacent to the facilities and access roads would remain suitable to support various special-status species.

The Proposed Project's permanent impacts to upland habitats of less than 320 acres of natural land cover, spread over 48 corridor miles would not represent a considerable contribution to cumulative impacts to upland habitats in the region and would be substantially mitigated by conservation in accordance with the adopted MSHCPs, if SCE obtains PSE status, and/or by implementation of Applicant Proposed Measures involving the implementation of biological monitoring, nesting bird management activities, minimizing impacts to native vegetation, restoring temporarily affected areas and complying with State and Federal regulations and permits.

Wildlife Movement. While there may be temporary impacts to local wildlife movement along and across the Proposed Project area during construction, these temporary impacts are not considered a contribution to long-term cumulative impacts to wildlife movement since the duration of construction activity at any specific location along the 48-mile corridor would be relatively short in duration.

As part of their overall conservation strategies, the MSHCPs in the region emphasize preserving and improving linkages between important habitat preservation areas, in order to avoid or minimize cumulative impacts to wildlife movement. The Proposed Project would not appreciably affect the design and implementation of the planned MSHCP habitat linkages because of the relative widely-spaced, localized nature of the individual structures/facilities along the existing WOD corridor. The Proposed Project would not preclude wildlife movement opportunities along the alignment since wildlife movement routes (e.g., vegetated and unvegetated drainage features, canyon-like areas, and dirt roads) would be relatively undisturbed by the short-term and limited nature of construction and operation activities of the Proposed Project. Thus, the Proposed Project would not contribute to cumulative impacts to wildlife movement in the region.

Adopted Habitat Conservation Plans. The MSHCPs specifically recognize the need for infrastructure development in the region and within the plan areas. The Proposed Project would rely upon the existing utility corridor that was in place when the MSHCPs were developed. If SCE seeks and ultimately obtains take authorization as a PSE, the PSE process would ensure consistency with the MSHCPs. If SCE does not choose to request take authorization as a PSE, the USFWS and CDFW would assess the effects of the Proposed Project on the MSHCPs during their evaluation of any alternative incidental take authorization process. It is anticipated that required conservation measures would ensure that the Proposed Project would not adversely affect the conservation required in each MSHCP to offset cumulative impacts to covered species. The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.5 Cultural Resources

Impacts to cultural and paleontological resources are site-specific. The geographic scope of potential cumulative cultural and paleontological resource impacts is limited to the immediate vicinity of ground-disturbing activities that would occur during construction and operations. As a result, impacts are not typically additive or cumulative in nature. The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.6 Geology and Soils

Geological hazards are generally site-specific and depend on localized geologic and soil conditions. Like the Proposed Project, all cumulative projects would be required to comply with applicable laws, regulations, ordinances, and permits, and would be expected to implement Best Management Practices (BMPs) and Storm Water Pollution Prevention Plans (SWPPPs) where applicable to reduce erosion. Because the cumulative projects would not physically overlap with the location of the Proposed Project construction or infrastructure, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.7 Greenhouse Gas Emissions

Construction and operation of the Proposed Project would not result in significant impacts from greenhouse gas (GHG) emissions. The Proposed Project emissions, including construction would generate up to 1,644 metric tons of CO₂e per year, which is well below the SCAQMD threshold of 10,000 metric tons of CO₂e.

Although operation of the other projects in the cumulative impact analysis may result in an increase in GHG emissions, the Proposed Project's contribution to cumulative impacts would not be considerable, as the Proposed Project's GHG emissions would be substantially lower than the SCAQMD's significance threshold.

As discussed in Section 4.7, Greenhouse Gas Emissions, the Proposed Project would facilitate compliance with California's Renewable Portfolio Standard (RPS) by allowing full deliverability of new renewable resources located in the Blythe and Desert Center areas. In addition, the Path 42 Upgrade Project will facilitate the transfer of approximately 1,500 megawatts (MW) from Imperial Irrigation District (IID) to SCE's portion of the California Independent System Operator (CAISO) controlled grid, and will contribute to meeting the RPS goal. The West of Devers Interim Project also supports partial deliverability to renewable generators in the I-10 corridor, until the Proposed Project is completed. Achieving the goals established by California's RPS is a major component of the CARB's Scoping Plan to reduce GHG emissions in compliance with AB 32. As a result, the Proposed Project, along with the relevant cumulative projects, is consistent with the Scoping Plan. In addition, the Proposed Project would support renewable generation in excess of the current RPS that may be needed to satisfy AB 32 or EO S-3-05 GHG reduction goals.

The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.8 Hazards and Hazardous Materials

The Proposed Project would not be constructed or operated on a site listed as a hazardous materials site pursuant to Government Code Section 65962.5 and would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Proposed Project would not contribute to cumulative effects for these criteria. Proposed Project construction would result in less than significant impacts associated with the transport, use, disposal, or foreseeable upset of, or accidents involving, hazardous materials during construction. Like the Proposed Project, cumulative projects would be expected to adhere to all applicable laws and regulations to reduce the potential impacts from hazards, including impacts associated with emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school to less than significant.

Proposed Project construction and operation would result in less than significant impacts associated with wildland fires. Like the Proposed Project, cumulative projects would be expected to adhere to standard fire prevention protocols to reduce the potential impacts

from hazards, including impacts associated with wildland fires to less than significant. Therefore, construction and operation of the Proposed Project would have less than significant impact to risk of loss, injury, or death involving wildland fires, and the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.9 Hydrology and Water Quality

Construction and operation of the Proposed Project would not result in significant impacts to hydrology and water quality. Incremental impacts of the Proposed Project when compared to impacts of other cumulative projects would be less than significant and not cumulatively considerable. The Proposed Project would not substantially interfere with existing drainage patterns, nor would it create additional storm water runoff. BMPs would be adopted to reduce the potential for storm water runoff and pollution. Additionally, implementation of project-specific grading permit(s) and an SWPPP would protect water quality.

The Proposed Project presents no impacts related to groundwater withdrawals or risk associated with tsunamis or seiches, and less than significant impacts related to water quality standards, flooding and flood hazards, alteration of the drainage patterns, and storm water drainage systems. Many of these potential incremental impacts would be negligible (e.g., impacts to groundwater) or specific to the immediate vicinity of the construction and operation locations (e.g., alteration of drainage patterns). Because the cumulative projects would not physically overlap with the Proposed Project construction or infrastructure, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.10 Land Use and Planning

The Proposed Project, in combination with other cumulative projects, would not divide an established community; conflict with an applicable land use policy, plan, or regulation; or, conflict with an applicable habitat conservation plan or natural communities conservation plan. The Proposed Project would upgrade existing infrastructure by replacing existing 220 kV transmission lines and associated structures with new 220 kV transmission lines and structures; modifying existing substation facilities; removing and relocating existing 66 kV subtransmission lines; removing and relocating existing 12 kV distribution lines; and making various telecommunications improvements. The majority of the Proposed Project would occur in existing SCE or public right-of-way (ROW), or on existing parcels (substations and staging yards), and thus, would not physically divide an established community or conflict with a current land use designation. In the locations where the Proposed Project would be constructed in areas outside of existing ROW, Proposed Project construction would not divide an established community due to the fact that all construction activities would be temporary.

The projects listed above would be required to obtain relevant agency approval, which would likely ensure consistency with local land use plans. The Proposed Project's

contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.11 Mineral Resources

Construction and operation of the Proposed Project would not result in significant impacts to mineral resources. Other developments planned in the area are not anticipated to significantly affect the exploration or extraction of mineral resources. The Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.12 Noise

Construction and operation of the Proposed Project would not result in significant impacts related to noise. Other planned developments that are part of the cumulative impacts analysis may also generate noise during construction; however, the construction noise generated by the Proposed Project would occur intermittently over 36 to 48 months in locations throughout the Project Study Area. The Proposed Project's contribution to a construction noise impact at any location would be short in duration and less than significant. Operation of the other projects in the cumulative impacts analysis may result in an increase in ambient noise due to the increased traffic from land development. However, the noise due to the operation of the Proposed Project would be similar to existing conditions and would not cause a substantial permanent increase in ambient noise levels above levels existing without the Proposed Project. Therefore, the Proposed Project's contribution to cumulative noise during operation would be less than significant.

6.1.2.13 Socioeconomics, Population and Housing, and Environmental Justice

Construction of the Proposed Project is anticipated to have less than significant impacts related to socioeconomics, population and housing, and environmental justice. Construction of the Proposed Project, while lasting approximately 36 to 48 months, would not include substantial numbers of workers (up to approximately 334 workers at the height of construction). The labor demands of the Proposed Project would be met by existing SCE employees and by hiring specialty electrical transmission contractors. Similarly, it would not create new opportunities for local industry or commerce or impact population growth in the area. The number of positions required during the construction phase, combined with the large employment base to draw from in southern California, would not directly or indirectly induce new population growth in the area, and likewise, there would be little to no need for additional housing. Therefore, construction of the Proposed Project is not anticipated to combine with other projects to create cumulatively significant impacts relating to population growth and the need for additional housing. Also, the Proposed Project would not require the displacement of persons or homes. The Proposed Project would not disproportionately affect low income or minority populations.

Therefore, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.14 Public Services

The local jurisdictions within the Project Study Area provide public services. These jurisdictions include San Bernardino and Riverside counties, as well as the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, and Yucaipa.

Neither Proposed Project construction nor operation would result in a negative impact on a performance objective for police or fire services; an increase in school enrollment; or an increase in the use of libraries, parks, or other public facilities. Proposed Project impacts would be less than significant, and the Proposed Project would not substantially contribute to cumulative impacts.

In combination with the fact that construction activities would be of short duration and operation and maintenance (O&M) activities would be infrequent and of short duration, implementation of traffic control measures would ensure that the Proposed Project does not affect performance objectives for fire and police protection, even considering the effects of cumulative projects. As with the Proposed Project, cumulative projects would be expected to implement traffic control measures where practicable to ensure that emergency access is not obstructed. Therefore, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.15 Recreation

The Proposed Project would not directly or indirectly induce any population growth during construction. During construction, local parks may be used by workers during their lunch or break periods; however, the short duration of construction activity in the vicinity of any specific park near the 48-mile corridor, and the limited number of construction workers would not result in a significant increase in the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the Proposed Project would not contribute to or result in a significant cumulative impact to recreation resources.

The Proposed Project would not include the construction of recreational facilities; as a result, there would be no adverse physical effect on the environment from the construction of new or expansion of existing recreational facilities.

Impacts related to disruption of access to existing recreational opportunities from construction of the Proposed Project would be less than significant. Recreational opportunities within the cumulative impacts study area may also be impacted by construction of projects listed in Table 4.15-1, Recreational Resources within the Project Study Area. The temporary nature of such impacts would not be cumulatively considerable and would be less than significant.

6.1.2.16 Transportation and Traffic

Construction of the Proposed Project would result in less than significant impacts to transportation. The worst-case trip generation is approximately 2,475 peak-hour trips or 3,200 passenger car equivalents (PCEs). These trips will not all utilize the same route or affect the same roadways. Instead, they would be spread over the 7 substations, 10 staging areas, and 48-mile transmission corridor. The traffic generated during construction activities for the Proposed Project would occur for a short period of time (approximately 36 to 48 months) and dispersed throughout different portions of the project route. Operation and maintenance traffic to and from the Proposed Project would be very similar to existing conditions and is not expected to conflict with applicable congestion management programs.

Other developments that are part of the cumulative impacts analysis may generate traffic during construction or operation (or road/lane closures). Assuming the projects listed above would obtain approvals from relevant agencies, which would likely require mitigation measures related to transportation and traffic impacts, if necessary. Therefore, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.2.17 Utilities and Service Systems

Construction and operation of the Proposed Project would not result in significant impacts to utilities and service systems. Any potentially significant impacts to utilities and service systems due to the construction and operation of the other projects in the cumulative impact analysis would be addressed by the local agencies during each project's CEQA process. Therefore, the Proposed Project's contribution to any cumulative impacts would not be cumulatively considerable and would be less than significant.

6.1.3 Growth-Inducing Impacts

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

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

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

Would the project either directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding area?

Construction Impacts

The Proposed Project could be considered growth-inducing if growth resulted from direct and indirect employment needed to construct, operate, and maintain the Proposed Project, and/or if growth resulted from the additional electrical power that would be transmitted by the Proposed Project. As discussed in Section 4.13, Socioeconomics, Population and Housing, and Environmental Justice, the construction and operation of the Proposed Project would not directly or indirectly induce any population growth in the area. Construction would be performed by either SCE construction crews or contractors, and, in general, construction workers would be drawn from the local labor pool. If contract workers were employed, they would not cause growth in the area due to the short-term and temporary nature of their employment. As explained in Section 3.12, Project Operation and Maintenance, operation of the transmission, subtransmission, distribution, and telecommunications lines would be controlled remotely through SCE control systems and manually in the field as required. Such O&M activities would be conducted by current SCE personnel, and the Proposed Project would not require the hiring of any additional operations personnel.

The Proposed Project has been developed in order to facilitate and integrate the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid. While the additional capacity created by the Proposed Project could facilitate renewable generation development in the area, these projects would not create substantial amounts of permanent jobs and would not have a significant effect on population or housing. The Proposed Project is not designed to facilitate growth in the community, either directly or indirectly. It would accommodate growth in the area that is planned or approved by local land use authorities, but it would not by itself induce growth. Therefore, the Proposed Project would not induce substantial population growth in the area.

Would the project remove obstacles to population growth?

Obstacles to population growth in the region served by the Proposed Project are primarily due to feasibility of development, economic constraints, permitting, and other development restrictions and regulations administered by local agencies. The Proposed Project would not affect the feasibility of development in the area, remove an obstacle to growth, or affect development restrictions administered by local agencies.

Would the project require the construction of new community facilities that could cause significant environmental effects?

The Proposed Project has been developed in order to facilitate and integrate the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid. While the additional capacity created by the Proposed Project could facilitate renewable generation development in the area, these projects would not create substantial numbers of permanent jobs and would not have a significant effect on population or housing. The Proposed Project is not designed to facilitate growth in the community, either directly or indirectly. It would accommodate growth in the area that is planned or approved by local land use authorities, but it would not by itself induce growth. Therefore, the Proposed Project would not induce substantial population growth in the area that would require the construction of new community facilities that could cause significant environmental effects.

Would the project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

As presented in Chapter 1.0, Purpose and Need, the Proposed Project is needed for SCE to fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid (see Chapter 1.0, Purpose and Need, Table 1.1, Interconnection Requests for the Blythe and Desert Center Areas). The Proposed Project would also facilitate interconnection of future renewable or non-renewable generation projects in the Blythe and Desert Center areas and the Coachella Valley area. For the generation projects described in Chapter 1.0, Purpose and Need, that are already under development or operational, the Proposed Project is not expected to encourage or facilitate activities that could significantly affect the environment as these projects are already in development. Other future generation projects that utilize the Proposed Project's increased transmission capacity are expected to complete environmental review and comply with applicable regulatory requirements prior to development, and any potential environmental impacts associated with those generation projects cannot reasonably be known at this time.

The Proposed Project has been designed to comply with applicable reliability planning criteria required by the North American Electric Reliability Corporation (NERC), the Western Electricity Coordinating Council (WECC), and CAISO and meet the project need while minimizing environmental impacts. The Proposed Project would not encourage or facilitate other activities that could significantly affect the environment. Therefore, there would be no impact under this criterion.

6.1.4 Significant Environmental Effects of the Proposed Project

The CEQA Guidelines (Section 15126.2) requires a discussion of the overall significance of the environmental effects of the project. This discussion is to distinguish between the direct and indirect effects of a project, and the short-term/long-term effects of a project. These potential significant environmental effects are summarized in Table 6.2, Potential Significant Environmental Effects. With the implementation of APMs, all of the potential significant environmental effects associated with the Proposed Project would be reduced to less than significant levels, with the exception of Air Quality.

Resource	Description	Direct/Indirect	Short Term/Long Term
Air Quality			
Regional Air Quality	During construction, CO, VOC, NO_X , PM_{10} , and $PM_{2.5}$ emissions would exceed corresponding SCAQMD construction significance thresholds.	Direct	Short term: APMs APM-AIR-1 and APM-AIR-2 would be adopted to lessen emissions; however, the impact would remain significant and unavoidable.

 Table 6.2: Potential Significant Environmental Effects

APMs = Applicant Proposed Measures

CO = carbon monoxide

 $NO_X = nitrogen oxides$

 $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter

 PM_{10} = particulate matter less than 10 microns in diameter

SCAQMD = South Coast Air Quality Management District

VOC = volatile organic compounds

6.1.5 Mandatory Findings of Significance

The Mandatory Findings of Significance are as follows:

Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The Proposed Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of a major period of California history or prehistory.

The Proposed Project would involve short-term construction activities such as replacing existing 220 kV transmission lines and associated structures with new, higher-capacity 220 kV transmission lines and structures; modifying existing substation facilities; removing and relocating existing subtransmission (66 kV) lines; removing and relocating existing distribution (12 kV) lines; and making various telecommunication improvements. Neither construction nor operation would substantially degrade the quality of the environment.

The Proposed Project would result in less than significant impacts to existing habitats, wetlands, and waterways. Therefore, the Proposed Project would not substantially reduce the habitat of a fish or wildlife species.

The Proposed Project would not have substantial impacts on wildlife habitat, wildlife refuges or critical habitat. Any placement of fill in waterways would comply with Federal and State wetlands and waterways regulations, and no discharges of domestic or industrial effluent would occur that could threaten the survival of a species. The Proposed Project's impacts on biological resources would be less than significant with incorporation of APMs. Therefore, the Proposed Project would not cause a fish or wildlife population to drop below self-sustaining level or threaten to eliminate a plant or animal community.

The Proposed Project would have less than significant impacts on special-status plants and animals. It would not involve construction of a highway, levee, or other major infrastructure that could restrict the range of a species. Therefore, the Proposed Project would not restrict the range of a rare or endangered plant or animal and any biological impacts would be less than significant.

The Proposed Project would have a less than significant impact to historic resources with incorporation of APMs, and would not eliminate important examples of the major periods of California history or prehistory. Therefore, any impacts to cultural resources would be less than significant.

Overall, the Proposed Project would not substantially degrade the quality of the environment and all environmental impacts, with the exception of construction air quality impacts, would be reduced to less than significant with the incorporation of APMs. The estimated controlled total peak day emissions of CO, VOCs, NOx, PM₁₀ and PM_{2.5} during construction activities exceed corresponding SCAQMD regional significance thresholds. Compliance with the regulatory requirements and implementation of APM-AIR-1 and APM-AIR-2 would reduce air quality impacts but not to a less than significant level. Therefore, significant and unavoidable impacts are anticipated during construction and would be temporary.

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

As discussed above in Section 6.1, Cumulative Impacts, the Proposed Project could result in cumulatively considerable air quality impacts.

Construction of the Proposed Project would result in emissions that exceed SCAQMD emissions thresholds for CO, VOC, NO_X , PM_{10} , and $PM_{2.5}$. Therefore, construction of the Proposed Project along with other projects included in the cumulative impact analysis (refer to Table 6.1, Cumulative Projects Located in the Vicinity of the West of Devers Upgrade Project) that would be under construction or in operation at the same time as the Proposed Project is under construction may result in cumulatively considerable net increases in CO, VOC, NO_X , PM_{10} , and $PM_{2.5}$ emissions. Compliance with APM-AIR-1 and APM-AIR-2 would reduce impacts, but the cumulative impact from these emissions is expected to remain significant.

Operation of the Proposed Project would have a less than significant impact to air quality. During operation of the Proposed Project, emissions would be limited to those produced from vehicles during occasional site visits for routine maintenance and emergency repair. These intermittent visits would not contribute significantly to cumulative air quality impacts during operation of the Proposed Project.

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

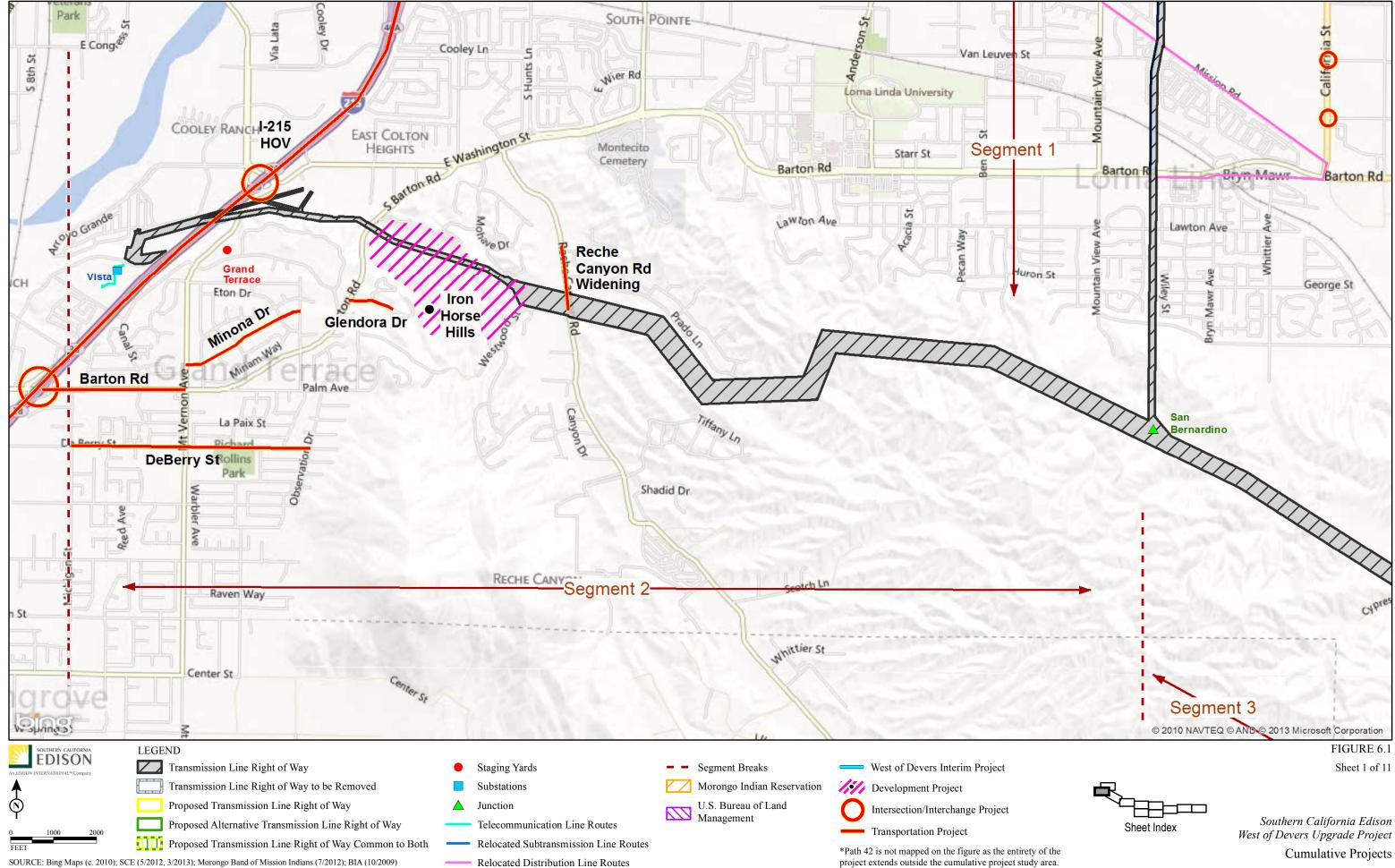
The Proposed Project would not result in environmental impacts that would have substantial direct or indirect effects on human beings, including air quality, noise, traffic, or potential for hazards from hazardous materials or accidents in close proximity to residential or recreational areas. As presented in Chapter 4.0, Environmental Impact Assessment, and with the exception of air quality, the direct and indirect impacts of the Proposed Project's construction and operation would be less than significant.

6.2 References Cited

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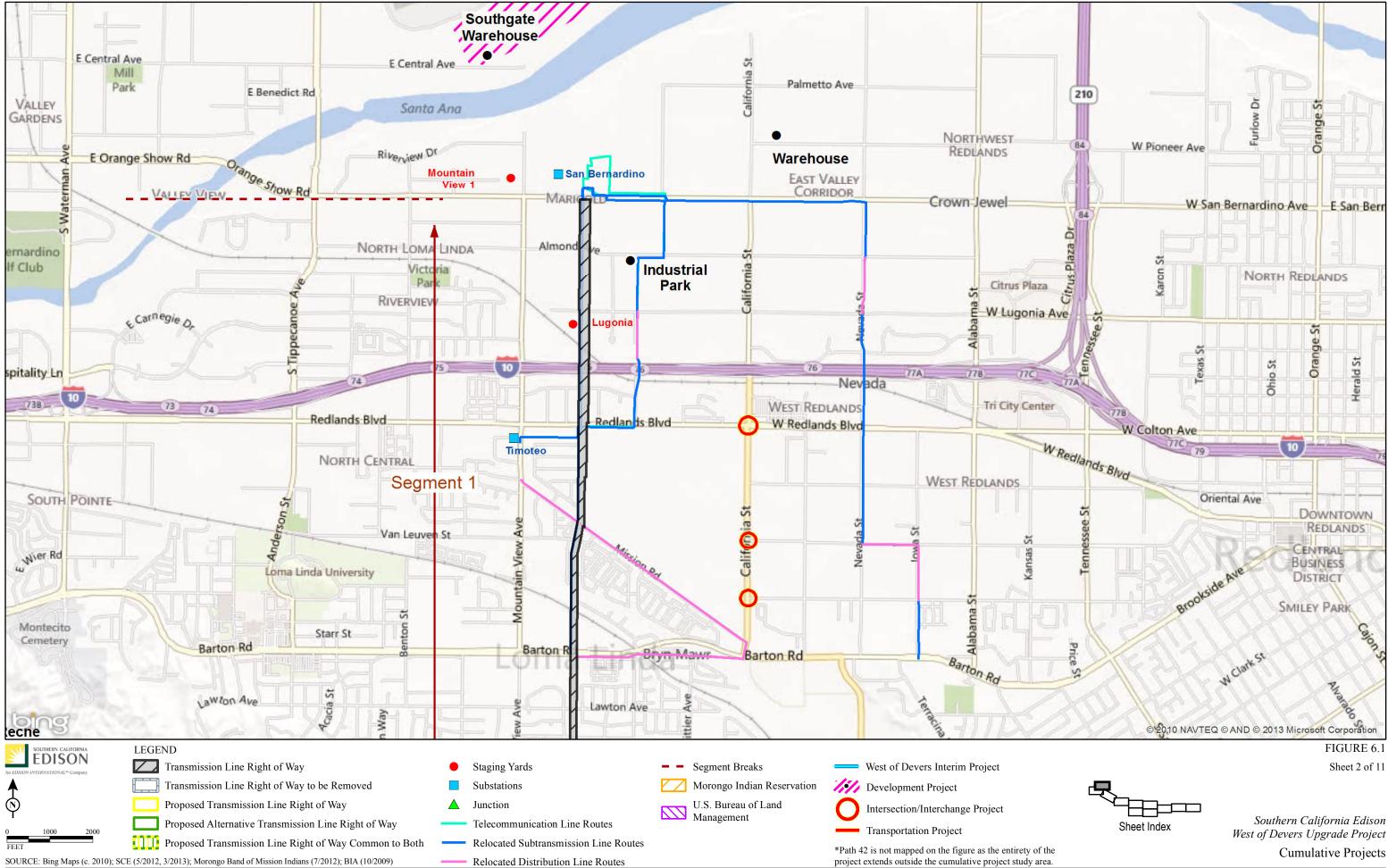
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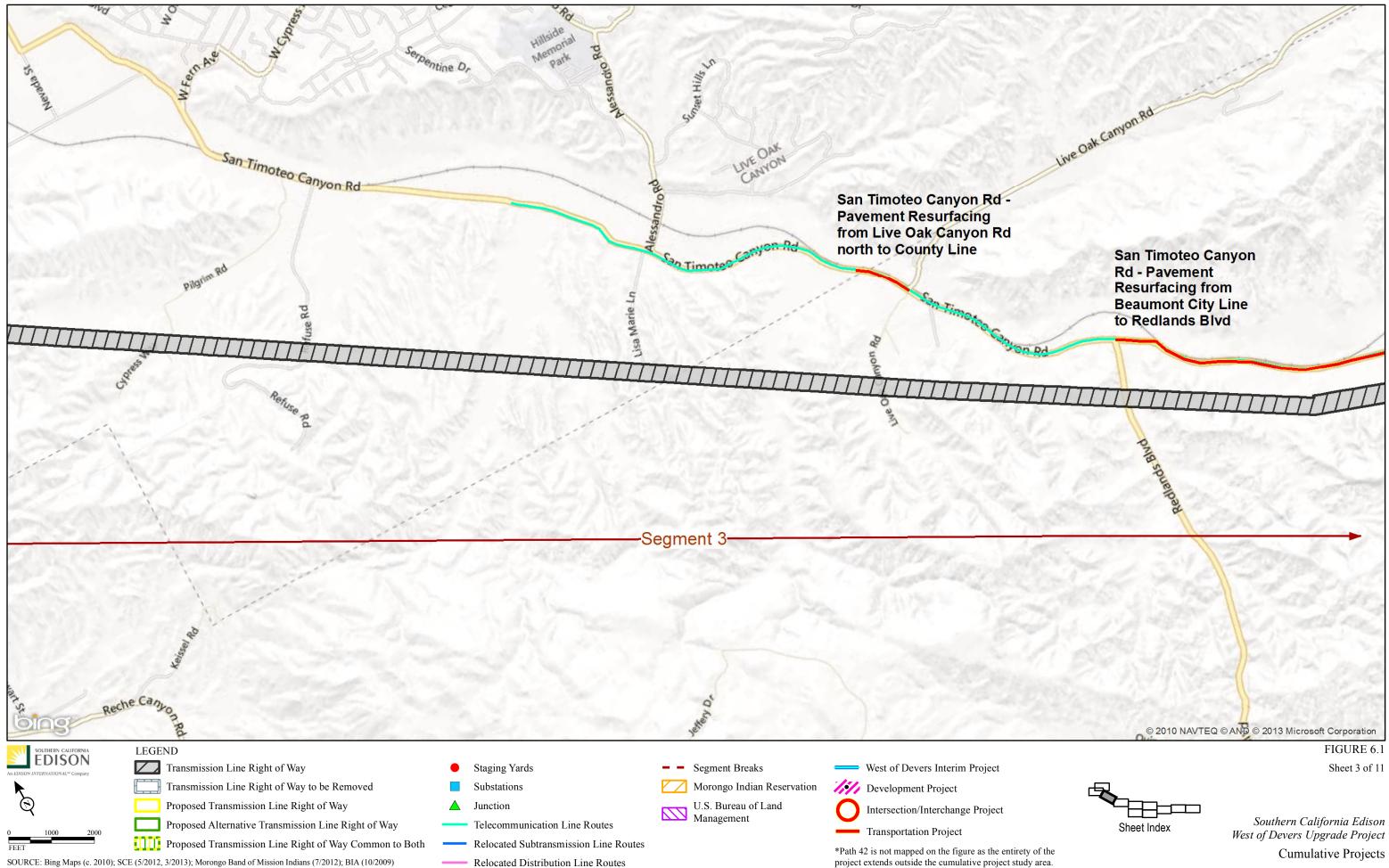
project extends outside the cumulative project study area.

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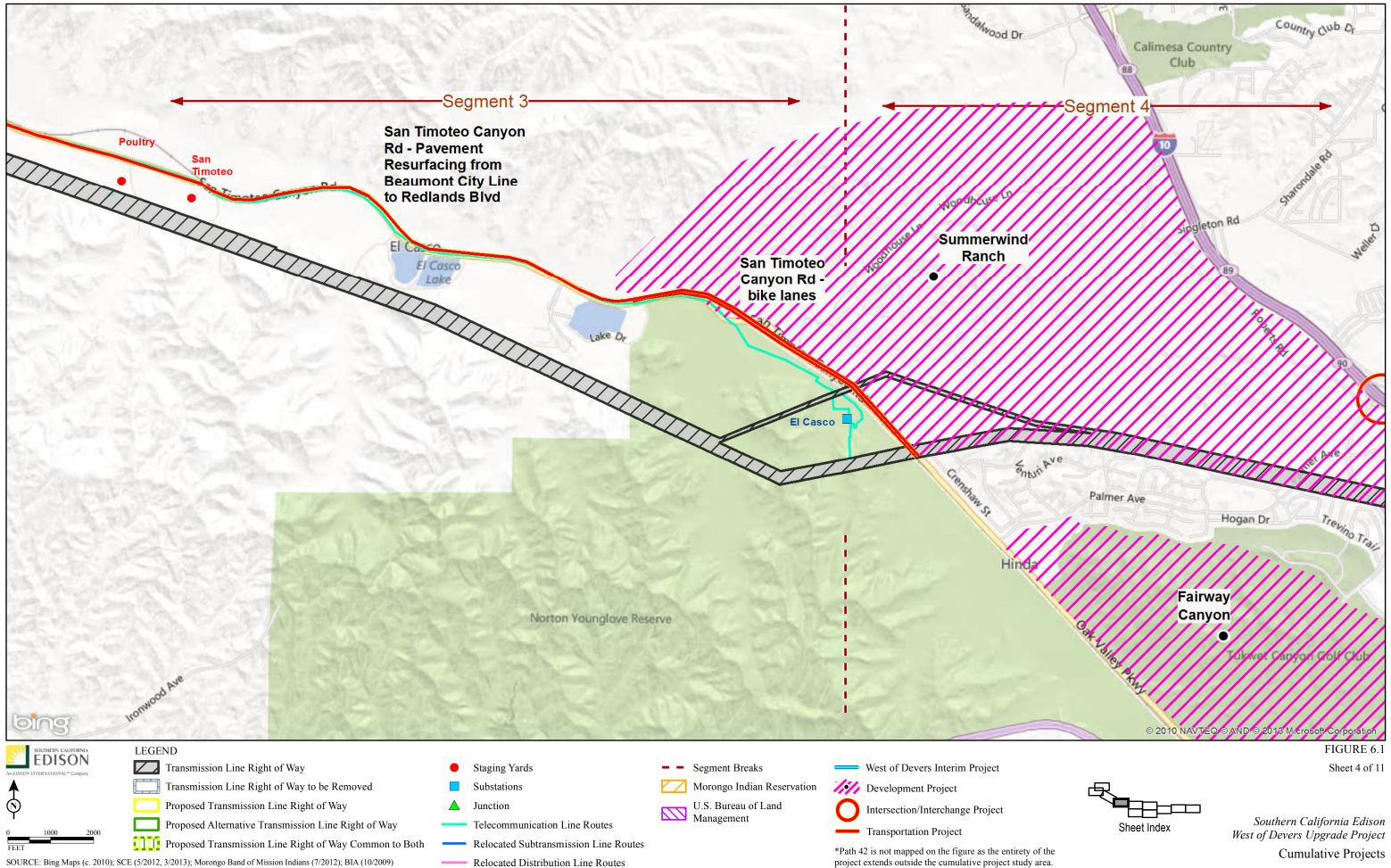
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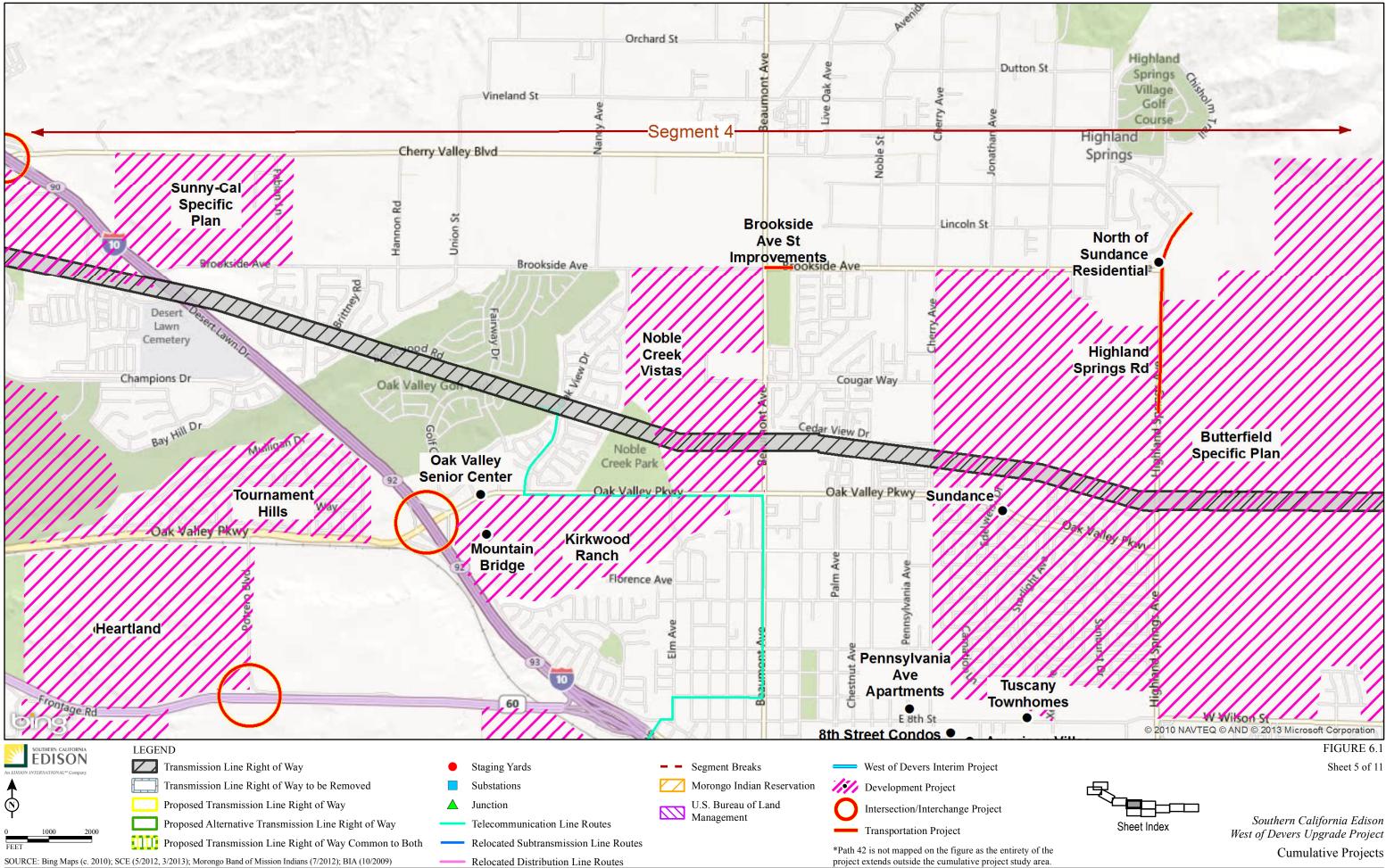
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