4.0 OTHER ENVIRONMENTAL CONSIDERATIONS

4.1 GROWTH INDUCING IMPACTS

A project may be growth inducing if it removes obstacles for growth or if other activities which may encourage growth of the area are encouraged or facilitated. Concern of growth inducing impacts stems from concern that additional growth activities may significantly affect the environment either individually or cumulatively. Growth inducing potential is considered significant if it encourages growth or a concentration of population above what is assumed in local and regional land use plans or regional planning authority projections. Growth impacts could also occur if a project provides infrastructure which would accommodate a population beyond what is permitted by regional or local plans.

The proposed project does not include residential development or any type of development that will encourage or induce population growth or require permanent housing. Construction of the proposed project would require a considerable construction crew; however, the majority of the crew required for construction will not relocate to the project area but will be housed temporarily at various locations surrounding the project. Also, the operation and maintenance of the project facilities will require and support 12 permanent full-time employees. These employees may be hired from the local area or relocate to the area, but will not significantly increase the region's population or require new housing.

The project itself is not expected to encourage population growth of the area. Energy generated by the project will not cause an increase in population and will not provide any infrastructure which would accommodate a substantial population growth. The majority of the energy generated by the project will be used by existing populations in order to replace the existing energy that is generated by fossil-fueled power plants; this will aid in meeting the state's renewable energy goals.

The project is considered an alternative energy project and will help to achieve state goals of reducing state energy production dependence upon fossil fuels. Although the project will add additional energy supply in San Diego County, the project will help supplement energy supplies for existing and planned for development and as a source of energy will not contribute to unplanned development or growth. The project will not induce growth; therefore, no impacts are identified.

4.2 ADVERSE/SIGNIFICANT IMPACTS WHICH CANNOT BE AVOIDED OR MITIGATED

Environmental impacts of the proposed project are discussed in the environmental analysis contained in Section 3. All adverse or significant impacts which cannot be avoided or mitigated are discussed below and a complete analysis of these impacts is in Section 3.

Aesthetics and Visual Resources

Impacts to County lands in the area of Ribbonwood Road north of Interstate 8 (I-8) have been identified as an area where impacts to scenic vistas due to the construction and operation of wind turbines will occur. This impact to scenic vistas is considered significant and unmitigable. Impacts are further discussed in detail in Section 3.2.

According to the Bureau of Land Management (BLM) visual methodology of distance zone, viewer sensitivity and impacted critical viewpoints the project would substantially degrade the existing character or quality of the site and it's surrounding. This impact is significant and unmitigable. Impacts are further discussed in detail in Section 3.2.

Public Health and Safety

Potential equipment failure is considered an adverse or significant impact to public health and safety and cannot be avoided or mitigated. Improved wind turbine design and engineering makes the likelihood of equipment failure remote; however, the potential exists for impacts to public health and safety. This impact is further discussed in Section 3.14.3.

4.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Section 151262.2 (c) of the *California Environmental Quality Act (CEQA) Guidelines* specifies an Environmental Impact Report (EIR) must address significant irreversible environmental impacts and irretrievable commitments of resources that would be caused by the proposed project. Included in these changes are uses of nonrenewable resources for construction and operation, long term or permanent access to areas that were previously inaccessible, and irreversible accidental damages caused by the project.

Also, an irreversible or irretrievable commitment of resources refers to impacts on or losses to resources that cannot be reversed or recovered, even after an activity has ended and facilities have been decommissioned. A commitment of resources is related to use or destruction of nonrenewable resources, and the impacts that loss will have on future generations. For example, if Prime Farmland is developed, there would be a permanent loss of agricultural productivity.

Construction, operation and maintenance, and decommissioning of the proposed project would involve the irreversible and irretrievable commitment of materials, energy, biological resources, landfill space, and human resources. The impacts on these resources would be permanent.

Materials. Material resources irretrievably used for the proposed project include steel, concrete, and other building materials. Such materials are not in short supply and would not be expected to limit other unrelated construction activities. The irretrievable use of material resources would not be considered significant. The preferential use of recycled building materials would reduce the overall amount of materials used for building construction.

Energy. Energy resources used by the proposed project would be irretrievably lost. These include fossil fuels (e.g., gasoline, diesel, natural gas, No. 2 fuel oil) and electricity. During construction, gasoline and diesel fuel would be used for the operation of construction vehicles and equipment. However, construction is temporary and the irretrievable loss of energy for construction would not be significant.

Also, the operation and maintenance of the proposed project would require only a minimum amount of energy and would not significantly increase the consumption of energy or fuel, and thus would not have a significant increase in the consumption or use of nonrenewable resources. Additionally, the 200 megawatts (MW) of electricity that the project would put back into the regional energy system would offset and far exceed the amount of energy that the project would consume.

Overall, consumption of energy resources would not place a significant demand on their availability in the region. Therefore, the project would have a less than significant impact on energy resources.

Biological Resources. The proposed project would result in some irretrievable loss of vegetation and wildlife habitat. The loss of vegetation would remove potential wildlife habitat and could degrade some remaining scenic and natural qualities of McCain Valley. However, all temporary impact areas would be restored to their pre-construction natural state and permanent loss would be appropriately mitigated at

ratios approved by the resource agencies. Therefore, impacts to biological resources are less than significant with mitigation.

Landfill Space. The generation of construction and demolition debris and subsequent disposal of that debris in a landfill would be an irretrievable loss. Construction contractors would be expected to recycle at least 40 percent of the debris that is generated. If a greater percentage is recycled, then irretrievable impacts on landfills would be reduced. There are numerous rubble landfills and construction and demolition processing facilities that could handle the waste generated. However, any waste that is generated by the proposed project that is disposed of in a landfill would be considered an irretrievable loss of that landfill space.

Human Resources. The use of human resources for construction is considered an irretrievable loss only in that it would preclude such personnel from engaging in other work activities. However, the use of human resources for the proposed project represents employment opportunities and is considered beneficial.

4.4 SHORT-TERM AND LONG-TERM PRODUCTIVITY OF THE ENVIRONMENT

A discussion of the relationship between the short-term and long-term productivity of the environment is required by the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) to be included in the Environmental Impact Statement. This discussion is to analyze the short and long-term environmental impacts the project may have and to consider short-term uses with longer-term productivity.

Short-term uses of the biophysical components of the human environment include direct impacts, usually related to construction activities that occur over a period of less than 5 years. Long-term uses of the human environment include those impacts that occur over a period of more than 5 years including permanent resource loss.

Short-term impacts would include construction and decommissioning impacts. Construction impacts are related to the construction of access roads, transmission lines, substation, construction staging sites, and turbine sites. Decommissioning impact will be similar in nature to construction with the use of heavy equipment to remove and transport the project components after the projected 30-year life span. Short-term construction and decommissioning impacts are discussed by environmental impact in Sections 3.1 through 3.18.

Short-term economic benefits would include local spending by contractors on personnel, materials, and equipment in addition to lodging, food, and other incidental purchases. These purchases would be considered a short-term beneficial economic impact on local business.

The local short-term impacts and use of resources by the construction of any of the build alternatives would be consistent with operation, maintenance and enhancement of long-term productivity for the local area, state, and region. The construction of the Tule Wind Project has been anticipated and studied since 2005. It can be concluded that the public benefits of the project clearly outweigh the potential for environmental and social impacts. This conclusion was carefully considered and is based upon the following:

- There is a need for this project that was established in 2005;
- A wide range of alternatives has been evaluated in an attempt to minimize environmental impacts;

- The overall environmental impacts of any of the build alternatives are not unreasonable when given the over all scope of this project;
- The review agencies involved in the project development process have not expressed major concerns related to regulated resources as the project does not impact any threatened or endangered species; and
- The project would stimulate and benefit the local economy of the County and region.

Development of the proposed project or any of the build alternatives would not adversely or significantly impact the long-term productivity of the project site or surrounding area.