

F. OTHER CEQA CONSIDERATIONS

F.1 Growth-Inducing Effects

The California Environmental Quality Act (CEQA) requires a discussion of the ways in which a proposed project could be an inducement to growth. The CEQA Guidelines (Section 15126.2d) identify 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 environment. 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 projects that are growth inducing are the expansion of urban services into a previously unserved or underserved area, the creation or extension of transportation links, or the removal of major obstacles to growth. It is important to note that these direct forms of growth have secondary effects of expanding the size of local markets and attracting additional economic activity to the area.

Typically, the growth-inducing potential of a project would be considered significant if it stimulates human population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth impacts could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies.

The South Bay Substation Relocation Project (Proposed Project) primarily involves relocation of the existing South Bay Substation to a new site approximately 0.5 mile south. The existing South Bay Substation would be relocated to the proposed Bay Boulevard Substation site. The South Bay Substation is an aging 138-/69-kilovolt (kV) substation that was originally built to accommodate the adjacent South Bay Power Plant (SBPP) in the City of Chula Vista (City). The South Bay Substation was originally constructed in 1961 and consists of equipment that was not built to modern seismic standards. The existing 138 kV bus is undersized for current transmission system conditions. The 69 kV bus is also configured in such a way that overloads of the 69 kV transmission line occur in the South Bay region caused by 69 kV bus outages at the South Bay Substation. With the potential retirement of the SBPP, a replacement bulk power source is being proposed to connect to the existing 230 kV transmission lines in the area (Otay Metro Power Loop (OMPL) Project). The project would result in a reliable energy source for the South Bay region subsequent to the retirement of the SBPP.

Potential growth-inducing impacts of the Proposed Project could be manifested in two fundamental ways:

1. Growth could result from the direct and indirect employment required to construct and operate the Proposed Project.
2. Growth could result from the additional energy infrastructure provided by the Proposed Project.

Each of these possibilities is addressed in the following sections.

F.1.1 Growth Caused by Direct and Indirect Employment for Construction of the Proposed Project

As described in Section D.13, Population and Housing, the construction and operation of the project itself would not affect the employment patterns in the area. San Diego Gas & Electric Company (SDG&E) would employ approximately 7 to 36 workers at any one given time throughout the 38-month construction period. It is anticipated that the majority of workers would come from the San Diego area. Outside contractors may also be used who would commute from outside of San Diego County (County) and stay at existing local hotels during construction. There is an adequate supply of hotels and inns in the project area that could be utilized by the out-of-town personnel.

Project operation and maintenance would be accomplished by current SDG&E employees and would therefore not create new jobs. Because the project would not result in an increase in employment during operation and maintenance, the project would not increase demand for new housing.

F.1.2 Growth Related to Provision of Additional Energy Infrastructure

SDG&E provides electrical power services to the South Bay area, and it therefore must plan for facilities to meet electric demand needs for growth that is planned for and approved by the local planning agencies. In providing these services, SDG&E currently operates the South Bay Substation, which provides service primarily to the City and South Bay region. This substation provides power to industrial and commercial customers along the San Diego Bay waterfront, as well as the residential neighborhoods in Chula Vista.

SDG&E has determined that the Main Street Substation is at risk of failure due to its age (built in 1961), and design of the equipment and substation could result in power outages for the customers in the South Bay region. Additionally, as described in Section A of this Environmental Impact Report (EIR), due to planned commercial, residential, and redevelopment growth in the

South Bay area, additional substation capacity provided by the Proposed Project is needed to serve the existing load as well as new load created by planned land uses in the Chula Vista Bayfront Master Plan (CVBMP) subsequent to the retirement of the SBPP.

According to SDG&E's load forecast, the proposed South Bay Substation is required in order to meet expected electrical load growth, to maintain reliable electric service, and to prevent extended outages and disruption of services to existing customers in the South Bay region. While the project would create new larger and more reliable infrastructure, it would not extend infrastructure to previously unserved areas. The proposed substation would accommodate current demand projections identified by SDG&E, consistent with San Diego Association of Governments (SANDAG) established population projections for the South Bay region and surrounding SDG&E service area.

The proposed Bay Boulevard Substation is consistent with growth projections developed by SANDAG and has been designed to meet SDG&E's mandate to provide electrical service sufficient to meet demand and to ensure that continuous reliable service is available to its customers. In addition, the Proposed Project would not modify land use or zoning designations to permit new residential or commercial development and therefore would not foster growth, remove direct growth constraints, or add a direct stimulus to growth.

The remaining project components, including the dismantling of the South Bay Substation and construction of the transmission interconnections from the existing South Bay Substation to the proposed Bay Boulevard Substation, would not provide additional electrical load capacity or extend infrastructure to previously unserved areas and therefore would have no growth-inducing effects.

F.2 Significant Irreversible Changes

The CEQA Guidelines (Section 15126.2(c)) require that an EIR identify significant irreversible environmental changes that would be caused by the Proposed Project. These changes may include, for example, uses of nonrenewable resources as well as project accidents that could change the environment in the long term.

Development of the Proposed Project would require a permanent commitment of natural resources resulting from the direct consumption of fossil fuels, construction materials, the manufacture of new equipment that largely cannot be recycled at the end of the project's useful lifetime, and energy required for the production of materials.

F.3 Significant Environmental Effects That Cannot Be Avoided

The CEQA Guidelines (Section 15126.2(b)) require a discussion of any significant impacts that cannot be reduced to levels of insignificance. As discussed in Section D, Environmental Analysis, with implementation of the mitigation measures identified for each environmental category, impacts would be reduced to less than significant (Class II). No significant and unavoidable Class I impacts have been identified as part of the EIR preparation.

F.4 Cumulative Impacts

As required by the CEQA Guidelines (Section 15130 et seq.), the Proposed Project is analyzed in relation to other projects in the area resulting in impacts that are considered to overlap or interact in a cumulative manner with the impacts of the Proposed Project. It is important to consider the combined effects of all past, present, and reasonably foreseeable future projects to determine the cumulative effect of these projects on the region because, even though a single project may have individually minor impacts, when considered together with other projects, the effects may be collectively significant. A cumulative impact, then, is the additive effect of all projects in the same geographic area. The project itself would have a significant cumulative impact if the project's contribution to the overall significant cumulative effect is of a cumulatively considerable magnitude.

CEQA defines a cumulative impact as an effect that is created as a result of the combination of the Proposed Project together with other projects (past, present, or future) causing related impacts. Cumulative impacts of a project need to be evaluated when the project's incremental effect is cumulatively considerable and, therefore, potentially significant.

For purposes of this cumulative impact analysis, a list of projects in the same immediate vicinity and expected to be constructed during the same time period as the Proposed Project has been used in accordance with CEQA (Section 15130(b)(1)). These projects and their approximate geographic location are provided below. Projects that are completed, or in operation, are considered part of current baseline conditions discussed by issue area in Section D, and evaluation of the project's contribution to such impacts is presented below.

The projects in the cumulative scenario include a range of project types such as demolition activities, bike path improvements, infrastructure improvements, and master plan projects. Proposed and pending projects are presented that would be within the project area. The list of projects provided below includes projects for which applications have been submitted as well as projects that may foreseeably have impacts that would cumulate with those of the Proposed Project and are included in general plans or other planning documents. The following information provided was gathered from an internet search of local planning agencies, personal

communication with planning staff, review of general plans and community plans of the affected jurisdictions, and habitat conservation plans.

F.5 Cumulative Projects

Cumulative projects in the Proposed Project area include the SBPP Demolition Project, Industrial Boulevard Bike Lane, Colorado Avenue Sewer Line Improvements and Chula Vista Bayfront Master Plan which are described as follows:

South Bay Power Plant Demolition Project. The Demolition Work Plan for Dynegy Inc.'s SBPP, which is adjacent to the existing South Bay Substation, would include demolition of the power plant and remediation of the site. On Friday, October 15, 2010, the California Independent System Operation Corporation notified Dynegy Inc. that the power plant was approved for decommission and demolition (Port District 2010). Originally constructed over 50 years ago, the power plant consists of a 728-megawatt thermal power plant, small gas turbine plant, switchyard, aboveground storage tanks for fuel oil, and various ancillary systems on a 115-acre site. Demolition of the plant is expected to take 2 years to complete.

Industrial Boulevard Bike Lane. This project proposes the construction of a bike lane on both sides of Industrial Boulevard, between Naples Street and Palomar Avenue, and proposes to construct approximately 1,650 linear feet of bike lanes along both sides of the street, along with monolithic curb and gutter and sidewalk and drainage facilities on the east side. This project will allow enhanced pedestrian access in the project area. This project is a priority in the City's Bikeway Master Plan (City of Chula Vista 2010a) and grant application (SANDAG 2009). Construction was planned to begin in 2010 (SDG&E 2010a).

Colorado Avenue Sewer Line Improvements. This project involves the replacement of approximately 1,300 feet of 15-inch sewer line with an 18-inch sewer line between J and K Streets (City of Chula Vista 2010b). Construction was planned in 2010 (SDG&E 2010a).

Chula Vista Bayfront Master Plan. The Unified Port District of San Diego (Port District) and the City jointly prepared the CVBMP, which is within the project area and located west of Interstate 5 (I-5), south of Marina Parkway, and north of L Street. The Chula Vista Redevelopment Agency's *Five Year Implementation Plan – 2010 to 2014* identifies several of the projects proposed as part of the CVBMP, such as development of a resort conference center and residential development (Chula Vista Redevelopment Agency 2009). However, the plan still requires adoption by the California Coastal Commission, which is not anticipated until 2012. Since the CVBMP is not adopted by the California Coastal Commission, no specific project applications have been filed with jurisdictional agencies for development of any of the projects that are envisioned as part of the CVBMP (SDG&E 2010a).

As discussed in Section D, many of the potential impacts of the Proposed Project would occur during construction with few lasting operational effects. Because the construction-related impacts of the Proposed Project would be temporary and localized, they would only have the potential to combine with similar impacts of other projects if they occur at the same time and in close proximity. Construction impacts caused by the Proposed Project (primarily related to air quality, biological resources, noise, and traffic) could combine with similar effects of other projects being built in the project area, including the SBPP Demolition Project, Industrial Boulevard Bike Lane, and Colorado Avenue Sewer Line Improvements.

F.5.1 Aesthetics

Cumulative impacts to visual resources would occur where project facilities would be viewed in combination with other past, present, and future developments. The significance of cumulative visual impacts would depend upon a number of factors, including (1) the degree to which the viewshed is altered, (2) the degree to which visibility to scenic resources is impaired due to either view obstructions or direct impacts to scenic resource features, and (3) the degree to which the project's visual contrast or dominance is increased due to changes in the viewed environment.

To the extent that the Proposed Project would be visible during construction along with one or more of the cumulative projects, adverse cumulative impacts may occur from the construction equipment, vehicles, materials, staging areas, and personnel. These construction impacts, however, would be temporary and would not create significant cumulative effects.

The dismantling of the South Bay Substation along with the SBPP would provide a beneficial cumulative impact by removing industrial uses along the bayfront. The proposed Bay Boulevard Substation project components would not have adverse visual effects. In the absence of visual impacts, incremental accumulation of effects to visual resources would not occur due to development of the Proposed Project.

F.5.2 Agriculture Resources

As discussed in Section D.3, Agriculture Resources, the Proposed Project components would not result in impacts to agricultural resources. The Proposed Project and cumulative projects located in the vicinity are located within a developed area where agricultural resources are not present. In the absence of agricultural resources being impacted by the Proposed Project or cumulative projects, incremental accumulation of effects to agricultural resources would not result.

F.5.3 Air Quality

In analyzing cumulative impacts from the Proposed Project, the analysis should evaluate a project's contribution to the cumulative increase in pollutants for which the San Diego Air Basin is designated as nonattainment for the California and National Ambient Air Quality Standards. If the Proposed Project does not exceed the emission-based significance thresholds and is determined to have less-than-significant project-specific impacts, it may still have a cumulatively considerable impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of the significance thresholds. However, the project would only be considered to have a cumulative impact if its contribution accounts for a cumulatively considerable contribution.

Construction

The emissions of all criteria pollutants associated with the construction of the Proposed Project, including ozone precursors (volatile organic compounds and oxides of nitrogen [NO_x]), PM₁₀, and PM_{2.5}, would be below the emission-based significance levels, as discussed in Section D.4. However, the pollutants generated from construction of the cumulative projects could result in a localized impact on ambient air quality that would overlap with those of the Proposed Project if the construction work were to occur in proximity and at the same time. The proposed SBPP Demolition Project would occur in a similar time frame. APMs AIR-1 and AIR-2, which will reduce fugitive dust emissions resulting from Proposed Project construction, those phases of construction that would produce the highest levels of PM₁₀ and PM_{2.5} emissions (e.g., demolition and grading/earthmoving activities) are not expected to occur concurrently with the demolition of the SBPP, which is near the project site, particularly the existing South Bay Substation. Demolition of the SBPP is scheduled to be completed within 2 years (SDG&E 2010c). The Bay Boulevard Substation would commence construction with site development and below-grade construction, with the maximum levels of NO_x and fugitive dust (PM₁₀) occurring over 4 months. Demolition of the South Bay Substation would commence shortly after demolition activities associated with the SBPP have been completed (SDG&E 2010c). Thus, the contribution of the Proposed Project to cumulative impacts resulting from the Proposed Project and cumulative projects would be less than significant.

Moreover, due to the potential existence of asbestos-containing material in both the existing South Bay Substation and the SBPP Demolition Project, demolition of both facilities would require specific deconstruction methods for removal of such material, if found. Restrictions and precautions pertaining to the decommissioning of these facilities would reduce the amount of fugitive asbestos dust produced during the demolition processes to less than significant. Therefore, demolition activities are not anticipated to result in a cumulatively significant impact.

Operation and Maintenance

As previously discussed, following the completion of the Proposed Project, operational emissions associated with the Bay Boulevard Substation would be limited to maintenance vehicles used for periodic inspection, maintenance, and repair of the active project components. No stationary emissions sources would be associated with the project. Minor mobile source emissions would be the only direct source of emissions related to project operation. General inspections presently occur at the South Bay Substation and for transmission lines within SDG&E's right-of-way and presently result in limited light-duty and medium heavy-duty truck traffic. The Proposed Project would not require a substantial number of new vehicle trips compared to the existing conditions. It is anticipated that no new permanent employees would be needed to operate the Proposed Project. Total emissions resulting from vehicular traffic required during operational inspection and maintenance activities would have no identifiable effect on air quality.

Moreover, operation and maintenance activities for the Bay Boulevard Substation would not differ substantially from that of the current South Bay Substation. Therefore, due to the absence of any increase in operational emissions compared to existing conditions, the Proposed Project would not contribute to a cumulatively considerable impact.

A project may also be deemed to result in cumulative air quality impacts if it would result in stationary sources that would not comply with San Diego Air Pollution Control District (SDAPCD) rules and regulations or if it would induce population and/or employment growth exceeding the growth estimates included in the SDAPCD Regional Air Quality Strategy. The Proposed Project would not include any permanent, stationary sources of air pollution, and would not induce population and/or employment growth. Therefore, the Proposed Project would not contribute in a cumulatively considerable manner to cumulative air quality impacts associated with the nonattainment status of the San Diego Air Basin.

F.5.4 Biological Resources

The Proposed Project, along with the cumulative projects, is located within an area that is primarily previously disturbed, developed, urban areas. Since these project areas are mostly developed, there is only a slight potential to impact the same sensitive biological resources as the Proposed Project during construction activities. Site-specific impacts would be mitigated through avoidance of sensitive habitats and species, implementation of site-specific reseeded programs, purchase and/or restoration of wetland areas, and compliance with appropriate permit conditions determined by the California Department of Fish and Game, U.S. Army Corps of Engineers, California Coastal Commission, Regional Water Quality Control Board, and the U.S. Fish and Wildlife Service. Additionally, SDG&E is involved in project-specific mitigation and subregional mitigation programs through its subregional Natural Community Conservation Plan

(NCCP) that implements the regional biological conservation goals of the NCCP Act of 1991. With the disturbed nature of the cumulative project sites and the continued participation by SDG&E in its subregional NCCP and other project proponents within the study area in regional conservation planning such as the Multiple Species Conservation Program, impacts are not considered cumulatively considerable.

Construction noise emanating from construction and demolition activities associated within the Proposed Project and SBPP could result in cumulative indirect noise impacts to special-status avian species nesting within the San Diego National Wildlife Refuge. As indicated in Section D.5, Biological Resources, construction of the Proposed Project would include helicopter use for transmission pole installation and replacement in proximity to the San Diego National Wildlife Refuge; depending on the specific equipment required, noise generated by demolition of the SBPP could indirectly impact the same biological resources (nesting birds) as the Proposed Project. However, because impacts associated with construction of the Proposed Project would be mitigated through nesting bird surveys, the installation of temporary noise barriers to reduce noise levels to below 60 dBA Leq(h) (if necessary), and the restriction of helicopter activities to the non-breeding season (September 16 to February 28), the Proposed Project impacts are not considered cumulatively considerable.

F.5.5 Cultural Resources

Construction of the Proposed Project would not contribute to the potential for loss of known significant cultural resources. However, construction of the Proposed Project may contribute to the potential loss of yet to be discovered significant cultural resources. The cumulative scenario projects occur in urban areas that have been previously disturbed/developed and where no resources are known to occur. Development of the Proposed Project in conjunction with these other projects would require excavation activities that have the potential to disturb cultural resources. When viewed cumulatively, these projects could result in a significant impact to cultural resources. With proper environmental planning and appropriate mitigation, the Proposed Project is expected to successfully preserve significant cultural resources, if present, and can provide opportunities for increasing our understanding of past environmental conditions and cultural history. Therefore, the mitigation measures identified for the project's impacts would reduce the Proposed Project's cumulative impacts to cultural resources to a level that would be less than significant and not cumulatively considerable.

F.5.6 Geology and Soils

Potential cumulative geologic impacts (considering all proposed and in-progress development in the project area) consist of loss of unique geologic features or substantial alteration of the topography, or triggering or acceleration of erosion or slope failures. Seismic impacts (ground

shaking or ground failure) are not cumulative. Construction of the Proposed Project would occur primarily within developed areas and contribute only a negligible increase to potential cumulative geologic impacts. Mitigation measures that would minimize construction-related impacts caused by the Proposed Project would minimize the cumulative effects of these impacts to a level that would be less than significant and not cumulatively considerable.

F.5.7 Public Health and Safety

Because electromagnetic field (EMF) issues are not considered in this EIR to be environmental impact issues under CEQA, no discussion of cumulative impacts for EMF is presented. Therefore, this section focuses on hazardous materials and contamination.

As discussed in Section D.8, Public Health and Safety, a site assessment was conducted for the project study area that identified hazardous materials in the study area. Construction of the project and other proposed projects in the study area could increase the opportunity and likelihood for exposure of people to hazardous materials or health risks associated with disturbance of hazardous materials. Compliance with applicable laws and regulations identified in Section D.8 would reduce the project's cumulative impacts to health and safety to a level that would be less than significant and not cumulatively considerable. It is anticipated that adherence to applicable federal, state, and county laws and regulations associated with other projects in the area will reduce the cumulative risk of adverse public health effects associated with the use, storage, and transport of hazardous materials to less than significant.

F.5.8 Hydrology and Water Quality

Future and proposed construction projects in proximity to the Proposed Project could result in cumulative hydrologic and water quality impacts on the study area. The pollutants generated from construction of the cumulative projects could result in a significant cumulative impact on water quality if the construction work occurs in proximity and at the same time as the Proposed Project. For the Proposed Project, SDG&E would prepare a Stormwater Pollution Prevention Plan to comply with the National Pollutant Discharge Elimination System General Construction Activity Stormwater Permit, which requires implementation of best management practices. In addition, the project proposes to construct a drainage basin at the proposed Bay Substation Project site that would be designed to ensure stormwater flows would not exceed the capacity of the storm drain system. At the individual project level, hydrologic impacts can be mitigated to a less-than-significant level by incorporating mitigation measures that would ensure that the Proposed Project would comply with federal, state, and local water pollution control laws; that project-specific stormwater and erosion control plans are prepared and implemented; and dewatering activities would be completed consistent with local dewatering requirements (as described in Section D.9, Hydrology and Water Quality). Therefore, with implementation of

mitigation measures identified for the Proposed Project, the project's potential cumulative impacts to hydrology and water quality would be reduced to a level that would be less than significant and not cumulatively considerable.

F.5.9 Land Use and Planning

The construction for the Proposed Project combined with the cumulative projects may create significant short-term construction-related cumulative impacts to existing land uses (e.g., businesses adjacent to study area roads and public facilities within study area roads, as well as nearby recreational resources, including Marina View Park, J Street Marina/Bayside Park, and San Diego Bay National Wildlife Refuge). It is anticipated that cumulative impacts to existing land uses resulting from ongoing development can be mitigated to a level of less than significant at the individual project level by incorporating mitigation measures as described in Section D.10, Land Use and Planning, including providing construction notification and minimizing construction disturbance, providing continuous access to properties, coordinating with local businesses, and notifying users of recreational resources of planned construction activities. Additional mitigation measures are described to mitigate short-term construction impacts to traffic as described in Section D.16, Transportation and Traffic. These measures would reduce the Proposed Project's cumulative construction impacts to a level that would be less than significant and not cumulatively considerable.

The Proposed Project would be consistent with the planned land uses established in the CVBMP and would be a long-term beneficial impact to planned land uses in the project area.

F.5.10 Mineral Resources

As discussed in Section D.11, Mineral Resources, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state or result in the loss of availability of a locally important mineral resource. In the absence of impacts mineral resources, incremental accumulation of effects to mineral resources would not occur.

F.5.11 Noise

Potential adverse noise impacts during construction of the Proposed Project would be localized and would occur intermittently for varying periods of time throughout the estimated 38-month construction period. There are no sensitive receptors closer than 0.25 mile to the Proposed Project site. Further, residential neighborhoods are located east of I-5 and noise sources from the Proposed Project would be masked by I-5 traffic noise. Short-term cumulative impacts related to

ambient noise levels could occur if construction associated with the Proposed Project and surrounding development would be constructed simultaneously.

Short-term impacts from construction noise can be mitigated to a level of less than significant by limiting construction activities per local noise ordinances, as described in Section D.12, Noise. This measure would reduce the Proposed Project's cumulative construction impacts to a level that would be less than significant and not cumulatively considerable. Providing advanced notice of construction and a public liaison to minimize construction noise nuisances would further minimize impact due to short-term construction noise.

Operations at the Bay Boulevard Substation are not expected to be above daytime ambient noise levels in the project area and/or in excess of standards in the local noise ordinances for adjacent properties. Therefore, in the absence of significant impacts, incremental accumulation of significant effects due to the Proposed Project would not occur.

F.5.12 Population and Housing

As discussed in Section D.13, the Proposed Project would not require the removal of any existing housing units or displacement of any persons, and would have no effect on population growth in the area. Section F.1 provides a more detailed discussion of growth inducement related to the Proposed Project. In the absence of impacts to population and housing, incremental accumulation of effects to population and housing would not occur.

F.5.13 Public Services and Utilities

The Proposed Project would not create additional population growth and would have less-than-significant demands on public utilities. Construction of cumulative projects identified in Section F.3, when combined with the Proposed Project, could disrupt utility systems. As discussed in Section D.14, Public Services and Utilities, with implementation of Mitigation Measure PSU-1, which requires the applicant to notify the public of disruptions and coordination with affected jurisdictional departments and utilities in conjunction with final design, the portion of utility disruption impacts from the Proposed Project would not be cumulatively considerable.

F.5.14 Recreation

As discussed in Section D.15, Recreation, the Proposed Project would not would not create additional population growth and would not increase the use of existing parks such that substantial physical deterioration would occur or be accelerated or require the expansion or construction of new recreational facilities. In the absence of impacts to recreational resources, incremental accumulation of effects to population and housing would not occur.

F.5.15 Transportation and Traffic

As discussed in Section D.16, construction of the Proposed Project would contribute to short-term impacts to traffic circulation on local roadways. Significant cumulative traffic circulation impacts may result over the short-term with the SBPP Demolition Project since this project is anticipated to be conducted simultaneously and in the same general area. Short-term traffic impacts caused by construction of the projects proposed within the study area would result from street closures, increased truck traffic, and disruption of local traffic to local businesses. It is anticipated that short-term impacts to project area roads can be mitigated to a level of less than significant by incorporating mitigation measures as described in Section D.16, including preparation and implementation of a traffic control plan, staggering work shifts, and carpooling, as well as providing detours or safe areas along the construction zone for pedestrians and bicyclists. These measures will ensure that access will be maintained to individual properties and businesses, that emergency access will not be restricted, and that congestion and delay of traffic resulting from ongoing development are not substantially increased and will be of a short-term nature in accordance with the City's traffic control and engineering guidelines. These measures would reduce the Proposed Project's cumulative construction impacts to a level that would be less than significant and not cumulatively considerable.

The operation of the Proposed Project would generate minimal traffic only required for routine patrolling and maintenance, and, therefore, the project would not contribute to long-term cumulative impacts to traffic.

F.5.16 Climate Change

As discussed in Section D.17, Climate Change, greenhouse gas (GHG) emissions during operations and maintenance of the Proposed Project were estimated to be approximately 432 metric tons of carbon dioxide equivalent (MTCO₂E) per year. Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. As stated in Section D.17, the GHG emissions associated with the Proposed Project would be less than significant. Therefore, the Proposed Project would not result in a cumulatively considerable contribution of GHG emissions.

Furthermore, as discussed in Section F.5, cumulative projects in the Proposed Project area include the SBPP Demolition Project, Industrial Boulevard Bike Lane, and Colorado Avenue Sewer Line Improvements, which would generate minimal GHG emissions. These projects are not primary sources of GHG emissions as they include infrastructure improvements to existing facilities and the demolition of a power plant. Because GHG emissions generated during construction would be temporary and the operational GHG emissions would be minimal, GHG

emissions from the Proposed Project and the cumulative projects would result in a less-than-significant cumulative impact with respect to GHG emissions.

F.6 References

- 14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
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- SDG&E (San Diego Gas & Electric Company). 2010a. *Proponent’s Environmental Assessment (PEA) for South Bay Substation Relocation Project*. Prepared by Insignia Environmental. June 2010.
- SDG&E. 2010b. *Proponent’s Environmental Assessment (PEA) for South Bay Substation Relocation Project*, Attachment 4.5-A, Phase 1 Cultural Resource Survey for the SDG&E South Bay Substation Relocation Project, San Diego County, California. Report No. 4482-2A: prepared by RECON Environmental Inc.
- SDG&E. 2010c. South Bay Substation Relocation Project: Deficiency Response Letter in Response to Completeness Review. September 8, 2010.