

## 5.0 Comparison of Alternatives

The purpose of an alternatives analysis pursuant to CEQA is to identify options that would feasibly attain most of the basic project objectives while reducing significant effects of the proposed project. Pursuant to Section IX.A.1.e of CPUC General Order 131-D, the applicant provided an analysis of the proposed project and alternatives as part of its application and PEA. After the application was filed, additional alternatives to the proposed project were identified during scoping and by the CPUC Energy Division as a result of the agency's independent review. The alternatives considered included reducing the scope of the proposed project, alternative construction methods, and alternative routes (Appendix H, "Screening Report"). The alternatives screening process evaluated three alternatives and identified two feasible alternatives to the proposed project, in addition to the No Project Alternative.

This chapter provides a comparison of the environmental advantages and disadvantages of the proposed project and each alternative retained for consideration in this EIR (Chapter 3, "Description of Alternatives"). The comparison is based on the assessment of environmental impacts of the proposed project presented in Chapter 4, "Environmental Analysis," with the impacts of the following three alternatives:

- Alternative A: Reduce the Scope of Work Along Segments 1, 2; and 3A;
- Alternative B: Install Some Structures Along Segment 4 via Helicopter; and
- No Project Alternative.

An Environmentally Superior Alternative is identified in Section 5.3.

### 5.1 Comparison Methodology

Specific direction regarding the methodology of alternatives comparison is not provided by the CEQA statute or guidelines. Projects must be evaluated in terms of the resource areas associated with the type of project and environmental setting. Resource areas that are generally given more weight in the comparison of alternatives are those with long-term impacts. Impacts associated with construction (i.e., temporary or short-term impacts) or those that can be easily mitigated to less than significant levels are given less weight. In this chapter, the following methodology is used to compare the proposed project and alternatives:

- **Step 1: Identification of Alternatives and Potential Environmental Effects.** A screening process was used to identify a number of alternatives to the proposed project. Appendix H, "Screening Report" discusses the criteria that were used to evaluate and select alternatives for further analysis, including their feasibility, the extent to which they would meet most of the basic objectives of the proposed project, and their potential to avoid or substantially lessen the significant effects of the proposed project. It also describes the alternatives to the proposed project that were retained for consideration in this EIR, and those that were initially evaluated but then eliminated from further consideration, and discusses the reasons for their elimination.
- **Step 2: Evaluation of Environmental Impacts.** The potential environmental effects listed in Appendix H, "Screening Report" were identified based on the CPUC's initial review of the Proponent's Environmental Assessment and the applicant's subsequent responses to CPUC

1 requests for further information about the proposed project. The environmental impacts of  
2 construction and operation of the proposed project are evaluated by resource area in  
3 Chapter 4 of this EIR. The evaluation presented in Chapter 4 is more detailed than the initial  
4 evaluation of potential environmental effects completed during the screening process.

- 5 • **Step 3: Comparison of the Proposed Project and Alternatives.** In this chapter, the  
6 environmental impacts of the proposed project are compared to those of each alternative.  
7 An Environmentally Superior Alternative is then identified. The Environmentally Superior  
8 Alternative is then compared to the No Project Alternative.  
9

### 10 **5.1.1 Environmental Impacts of the Proposed Project**

11  
12 Most of the impacts identified in Chapter 4, “Environmental Analysis,” would be less than significant  
13 or, with mitigation, reduced to less than significant levels with the exception of air quality impacts.  
14 Therefore, the proposed alternatives are intended to reduce but not eliminate significant air quality  
15 impacts, which would be significant and unavoidable. The analysis in this chapter compares the  
16 advantages and disadvantages of each retained alternative to the proposed project, and an  
17 Environmentally Superior Alternative is identified. The comparison of alternatives is provided to  
18 better inform decision makers at the CPUC about the steps taken during the EIR development  
19 process and the rigor under which the proposed project was evaluated.  
20

## 21 **5.2 Analysis of Alternatives**

22  
23 An analysis of the advantages and disadvantages of each alternative in comparison to the proposed  
24 project is presented in this section.  
25

### 26 **5.2.1 Alternative A - Reduce the Scope of Work Along Segments 1, 2, and 3A**

27  
28 This section compares the environmental impacts of the proposed project with those of  
29 Alternative A. Alternative A includes leaving the existing 30 foundations and 17 topped  
30 subtransmission wood poles along Segments 1, 2, and 3A that resulted from the past work that  
31 occurred between 1999 and 2004 in place. The temporary and permanent disturbance acreages for  
32 the proposed project would be 201.10 and 110.42, respectively (Table 2-8). Temporary ground  
33 disturbance associated with up to 30 foundations and 17 topped subtransmission wood poles  
34 would be approximately 8.07 acres. Therefore, the temporary disturbance acreage for Alternative A  
35 would be 193.03. Alternative A would have the same permanent disturbance as the proposed  
36 project.  
37

38 A description of Alternative A is provided in Chapter 3, “Description of Alternatives.” As further  
39 discussed in Appendix H, this alternative is potentially feasible and would meet the basic objectives  
40 of the proposed project.  
41  
42  
43

**Table 5-1 Summary of the Alternatives Analyses and Determinations**

<b>Resource Area</b>	<b>Proposed Project (Impact Determination)</b>	<b>Alternative A Reduce the Scope of Work along Segments 1, 2, and 3A</b>	<b>Alternative B Install Some Structures along Segment 4 via Helicopter</b>	<b>No Project Alternative</b>	<b>Environmentally Superior Alternative*</b>
Aesthetics	Less than significant <i>with mitigation</i>	Similar	Similar	Less	Proposed Project
Agriculture and Forestry Resources	Less than significant	Similar	Similar	Less	Proposed Project
Air Quality	Significant	Less	Similar	Less	Alternative A
Biological Resources	Less than significant <i>with mitigation</i>	Less	Less	Less	Alternative A
Cultural Resources	Less than significant <i>with mitigation</i>	Less	Less	Less	Alternative A
Geology, Soils, and Mineral Resources	Less than significant <i>with mitigation</i>	Similar	Similar	Less	Proposed Project
Greenhouse Gas Emissions	Less than significant	Less	Greater	Less	Alternative A
Hazards and Hazardous Materials	Less than significant <i>with mitigation</i>	Similar	Similar	Less	Proposed Project
Hydrology and Water Quality	Less than significant	Less	Less	Less	Alternative B
Land Use and Planning	Less than significant	Similar	Similar	Less	Proposed Project
Noise	Less than significant <i>with mitigation</i>	Less	Greater	Less	Alternative A
Population and Housing	Less than significant	Similar	Similar	Less	Proposed Project
Public Services and Utilities	Less than significant <i>with mitigation</i>	Similar	Less	Less	Alternative B

**Table 5-1 Summary of the Alternatives Analyses and Determinations**

<b>Resource Area</b>	<b>Proposed Project (Impact Determination)</b>	<b>Alternative A Reduce the Scope of Work along Segments 1, 2, and 3A</b>	<b>Alternative B Install Some Structures along Segment 4 via Helicopter</b>	<b>No Project Alternative</b>	<b>Environmentally Superior Alternative*</b>
Recreation	Less than significant	Similar	Similar	Less	Proposed Project
Transportation and Traffic	Less than significant <i>with mitigation</i>	Less	Less	Less	Alternative A
Cumulative	Less than significant	Similar	Similar	Less	Proposed Project
Growth Inducing	Less than significant	Similar	Similar	Similar	Proposed Project

Note:

\*If the Environmentally Superior Alternative is the No Project Alternative, CEQA requires the identification of an Environmentally Superior Alternative among the other alternatives (CEQA Guidelines Section 15126.6). In addition, where impacts would be similar to the proposed project, the proposed project is selected as environmentally superior rather than the alternative.

1 **5.2.1.1 Environmental Impacts and Mitigation Aesthetics**

2  
3 The topped poles and foundations are existing and part of the environmental baseline for the  
4 proposed project and Alternative A. Alternative A would not result in a greater visual impact  
5 compared to the proposed project as a result of leaving the poles and foundations in place.  
6 However, the proposed project would result in a beneficial impact on the visual quality along  
7 Segment 3A from the removal of the topped poles. Construction and operation of the remaining  
8 components of Alternative A would have similar impacts on aesthetics as the proposed project.  
9 Mitigation applicable to the proposed project would be applicable to Alternative A.

10  
11 **Agriculture and Forestry Resources**

12 Approximately 11 of the 17 topped poles located along Segment 3A are on Important Farmland.  
13 Alternative A would prevent approximately 0.001 acres of Important Farmland from returning to  
14 agricultural use. The topped poles and foundations are existing and part of the environmental  
15 baseline for the proposed project and Alternative A. Alternative A would not result in a greater  
16 impact on Important Farmland compared to the proposed project as a result of leaving the poles in  
17 place. However, the proposed project would result in a beneficial impact on Important Farmland  
18 along Segment 3A from the removal of topped poles, which would provide additional land to be  
19 used for agricultural operations. None of the foundations are located on designated Important  
20 Farmland.

21  
22 Neither the proposed project nor Alternative A would impact a Williamson Act contract or  
23 agricultural zoning as the construction of a subtransmission line is a compatible use, as further  
24 discussed in Section 4.2, "Agriculture and Forestry Resources." Forestry resources are not located  
25 along Segments 1, 2, or 3A; therefore, Alternative A would have similar impacts as described for the  
26 proposed project. Impacts on agriculture and forestry resources during construction under  
27 Alternative A would be less than significant with mitigation.

28  
29 Operation of Alternative A would have a similar impact on agriculture and forestry resources as the  
30 proposed project, considering that operation activities would be the same under each alternative.

31  
32 **Air Quality and Greenhouse Gases**

33 Air pollutant and greenhouse gas (GHG) emissions would be generated during the various activities  
34 associated with construction of Alternative A from sources similar to the proposed project.  
35 Alternative A would decrease the use of construction equipment and ground disturbance compared  
36 to the proposed project, as a result of not removing the existing foundations and poles along  
37 Segments 1, 2, and 3A, which would reduce the total air pollutant and GHG emissions.

38  
39 As discussed in Section 4.3, "Air Quality," SBCAPCD and VCAPCD have prepared air quality plans  
40 that establish air quality emissions inventories and controls for ozone precursors (NOx and ROG)  
41 sources in the proposed project area. ROG and NOx emissions from the proposed project and  
42 Alternative A would be primarily from on-site construction equipment. As shown in Table 4.3-10,  
43 the proposed project's construction emissions in year 2015 would represent approximately two  
44 percent of the regional emissions inventories for NOx and less than 0.2 percent for ROG. In 2016,  
45 construction emissions would represent less than 0.1 percent for ROG and NOx of each county's  
46 emissions inventory.

47  
48 Alternative A would have fewer ROG and NOx emissions compared to the proposed project because  
49 the use of construction equipment would be reduced. Therefore, the construction emissions from

1 Alternative A would be a smaller percentage of each county’s planning emission inventory than the  
2 proposed project. However, the majority of the proposed project’s ROG and NO<sub>x</sub> emissions are  
3 related to pole and tower replacement activities along Segments 3B and 4 and access road  
4 improvements. These activities would occur regardless of whether Alternative A was implemented.  
5 Therefore, considering that the reduced scope elements are a small portion of the overall scope of  
6 the project, the emissions reductions would not be substantial.

7  
8 As described in Section 4.7.2.3 for the proposed project, all applicable jurisdictions for Alternative A  
9 have not officially adopted Climate Action Plans, policies, or regulations for the purpose of reducing  
10 GHG emissions from non-stationary sources. Direct GHG contributions for the proposed project and  
11 Alternative A are associated with the temporary use of mobile sources and heavy duty diesel-fired  
12 equipment. Since Alternative A would require less equipment and shorter use of equipment, direct  
13 GHG contributions from Alternative A would be less than the proposed project. No new permanent  
14 GHG-emitting equipment would be installed as part of the proposed project or Alternative A.

15  
16 Operational emissions from Alternative A would have a similar impact on air quality and GHG  
17 emissions as the proposed project, considering that operation activities would be the same under  
18 each alternative.

#### 19 20 **Biological Resources**

21 Alternative A would include construction activity within the same area as the proposed project.  
22 Therefore, Alternative A would expose potential risk to the same range of special status species and  
23 other sensitive biological resources. However, Alternative A would reduce the total amount of  
24 temporary ground disturbance (8.07 acres less) required along Segments 1, 2, and 3A compared to  
25 the proposed project. Direct impacts on special status plant species or sensitive habitat located  
26 adjacent to the existing foundations and topped poles would be reduced during construction.  
27 However, under Alternative A, existing infrastructure, such as tower foundations, would not be  
28 removed. Therefore, those areas would not be rehabilitated post-construction. Mitigation measures  
29 applicable to the proposed project would be applicable to Alternative A. Impacts on biological  
30 resources during construction under Alternative A would be less than significant with mitigation.

31  
32 Operation of Alternative A would have a similar impact on biological resources as the proposed  
33 project, considering that operation activities would be the same under each alternative.

#### 34 35 **Cultural Resources**

36 Alternative A would include construction activity within the same area as the proposed project and  
37 would not impact any known cultural resources identified in Section 4.5, “Cultural Resources.”  
38 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)  
39 required along Segments 1, 2, and 3A compared to the proposed project, which would reduce the  
40 potential to disturb a previously undiscovered cultural resource. Mitigation measures applicable to  
41 the proposed project would be applicable to Alternative A. Impacts on cultural resources during  
42 construction under Alternative A would be less than significant with mitigation.

43  
44 Operation of Alternative A would have a similar impact on cultural resources as the proposed  
45 project, considering that operation activities would be the same under each alternative.

1 **Geology, Soils, and Mineral Resources**

2 The topped poles and foundations are existing and part of the environmental baseline for the  
3 proposed project and Alternative A. Alternative A would not result in a greater geologic impact  
4 compared to the proposed project as a result of leaving the poles and foundations in place.  
5 However, the proposed project would result in a beneficial impact on seismic risk along  
6 Segment 3A from the removal of the topped poles, which would reduce the risk of loss or injury  
7 from a topped pole falling during a seismic event. Construction of the remaining components of  
8 Alternative A would have similar impacts on geology, soils, and minerals compared to the proposed  
9 project as construction and operation activities would occur within the same area. Mitigation  
10 applicable to the proposed project would be applicable to Alternative A. Impacts on geology, soils,  
11 and mineral resources during construction under Alternative A would be less than significant with  
12 mitigation.

13  
14 Operation of Alternative A would have a similar impact on geology, soils, and minerals as the  
15 proposed project, considering that operation activities would be the same under each alternative.

16  
17 **Hazards and Hazardous Materials**

18 Alternative A would include the use, transport, and disposal of the same types and generally the  
19 same amount of hazardous materials as the proposed project. Construction of Alternative A would  
20 include the use of the same construction equipment and would occur within the same area as the  
21 proposed project. Therefore, Alternative A and the proposed project would have similar impacts on  
22 air hazards and Cortese List sites as identified in Section 4.8, "Hazards and Hazardous Materials."  
23 Mitigation applicable to the proposed project would be applicable to Alternative A. Impacts from  
24 hazards and hazardous materials during construction under Alternative A would be less than  
25 significant with mitigation.

26  
27 Operation of Alternative A would have a similar impact from hazards and hazardous materials as  
28 the proposed project, considering that operation activities would be the same under each  
29 alternative.

30  
31 **Hydrology and Water Quality**

32 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)  
33 required along Segments 1, 2, and 3A compared to the proposed project. Therefore, Alternative A  
34 would have less of an impact on increased soil erosion rates, sedimentation of adjacent water  
35 bodies, water quality standard violations, and beneficial uses along these segments. Construction of  
36 the remaining components of Alternative A would have similar impacts on hydrology and water  
37 quality compared to the proposed project as construction activities would occur within the same  
38 area. Impacts on hydrology and water quality during construction under Alternative A would be  
39 less than significant.

40  
41 Operation of Alternative A would have a similar impact on hydrology and water quality as the  
42 proposed project, considering that operation activities would be the same under each alternative.

43  
44 **Land Use and Planning**

45 Alternative A would occur within the same area as the proposed project. Therefore, construction  
46 and operation impacts on land use and planning under Alternative A would be the same as  
47 described for the proposed project and would be less than significant.

48

1 **Noise**

2 Alternative A would include the use of all of the same equipment as the proposed project; however  
3 the length of use of the equipment for pole and foundation removal along Segments 1, 2, and 3A  
4 would be reduced. Sensitive receptors along Segment 3A would experience shorter temporary  
5 increases in ambient noise levels. Noise from foundations removal along Segments 1 and 2 would  
6 attenuate to existing ambient noise levels at the locations of the closest sensitive receptors.  
7 Construction of the remaining components of Alternative A would have similar impacts from noise  
8 compared to the proposed project as construction activities would occur within the same area.  
9 Mitigation applicable to the proposed project would be applicable to Alternative A. Impacts from  
10 noise during construction of Alternative A would be less than significant with mitigation.

11  
12 Operation of Alternative A would have a similar impact from noise as the proposed project,  
13 considering that operation activities would be the same under each alternative.

14  
15 **Population and Housing**

16 The peak workforce for the proposed project on any given day is 105 workers. Alternative A would  
17 require fewer workers than the proposed project as Alternative A would include less construction  
18 activities. However, Alternative A and the proposed project would largely draw construction  
19 workers from the existing population within or near the project area. Therefore, Alternative A  
20 would have a similar impact on population growth during construction than the proposed project.  
21 Alternative A and the proposed project would have similar impacts on displacement of housing and  
22 people as the proposed would occur within the same area.

23  
24 Operation of Alternative A would have a similar impact on population and housing as the proposed  
25 project, considering that operation activities would be the same under each alternative.

26  
27 **Public Services and Utilities**

28 The peak workforce for the proposed project on any given day is 105 workers. Alternative A would  
29 require fewer workers than the proposed project as Alternative A would include less construction  
30 activities. However, Alternative A and the proposed project would largely draw construction  
31 workers from the existing population within or near the project area. Therefore, Alternative A  
32 would have a similar impact on service ratios for public services and utilities during construction as  
33 the proposed project.

34  
35 Operation of Alternative A would have a similar impact on public services and utilities as the  
36 proposed project, considering that operation activities would be the same under each alternative.

37  
38 **Recreation**

39 The peak workforce for the proposed project on any given day is 105 workers. Alternative A would  
40 require fewer workers than the proposed project as Alternative A would include less construction  
41 activities. However, Alternative A and the proposed project would largely draw construction  
42 workers from the existing population within or near the project area. Therefore, Alternative A  
43 would have a similar impact on recreation facilities during construction as the proposed project.

44  
45 Operation of Alternative A would have a similar impact on recreation as the proposed project,  
46 considering that operation activities would be the same under each alternative.

47



1 **Traffic and Transportation**

2 Alternative A would require fewer daily construction workers and equipment to be onsite, which  
3 would reduce the anticipated number of daily peak hour trips below the 44 peak hour trips that are  
4 proposed for the proposed project. The Santa Barbara County CMP is not applicable to traffic  
5 associated with construction and the significant threshold established by Ventura County is 100  
6 peak hour trips. Alternative A would have a less of an impact on applicable congestion management  
7 program standards and circulation systems plan and policies. Alternative A would have similar  
8 impacts on air traffic patterns as the helicopter use would be similar for each alternative. Impacts  
9 from hazardous road design and inadequate emergency access would also be similar for both  
10 alternatives as the same oversized vehicles would be used to deliver materials and the same access  
11 roads would be used under each alternative. Alternative A would have less of an impact on the type  
12 III bike lane along SR 192 from the reduced amount of work that would occur along Segment 3A.  
13 Mitigation measures applicable to the proposed project would be applicable to Alternative A.  
14 Impacts on traffic and transportation during construction under Alternative A would be less than  
15 significant.

16  
17 Operation of Alternative A would have a similar impact on traffic and transportation as the  
18 proposed project, considering that operation activities would be the same under each alternative.  
19 Therefore, Alternative A would be the environmental superior alternative for this resource because  
20 it would generate less traffic during construction than the proposed project.

21  
22 **Cumulative Impacts**

23 All of the same cumulative projects identified in Section 6, "Cumulative Impacts and Other CEQA  
24 Consideration" for the proposed would occur under Alternative A. Therefore, cumulative impacts  
25 under Alternative A would be the same as described for the proposed project and would be less  
26 than significant.

27  
28 **Growth Inducing Impacts**

29 The peak workforce for the proposed project on any given day is 105 workers. Alternative A would  
30 require fewer workers than the proposed project as Alternative A would include less construction  
31 activities. However, Alternative A and the proposed project would largely draw construction  
32 workers from the existing population within or near the project area. Therefore, Alternative A  
33 would have a similar impact on growth inducing impacts during construction as the proposed  
34 project.

35  
36 Operation of Alternative A would not directly or indirectly contribute to population growth.  
37 Alternative A would not require additional long-term staffing. Alternative A would not induce  
38 additional electrical consumption. Rather, Alternative A, similar to the proposed project, would  
39 meet emergency electrical demands of the Santa Barbara South Coast area, while enhancing  
40 operational flexibility.

41  
42 **5.2.2 Alternative B - Install Some Structures Along Segment 4 via Helicopter**

43  
44 This section compares the environmental impacts of the proposed project with those of  
45 Alternative B, under which, structures at construction sites 116 through 125 (along Segment 4)  
46 would be installed via helicopter. The proposed project would include approximately 120 miles of  
47 access road, 5 miles of which require extensive road rehabilitation. The temporary and permanent  
48 disturbance acreages for the proposed project would be 201.10 and 110.42, respectively (Table 2-

8). Alternative B would include approximately 117 miles of access road, 4.5 miles of which require extensive road rehabilitation. Temporary and permanent ground disturbance associated with the road widening/rehabilitation would be approximately 1.8 and 2.0 acres, respectively. Therefore, temporary and permanent disturbance acreages for Alternative B would be 199.3 and 108.42, respectively. A description of the alternative is provided in Chapter 3, "Description of Alternatives." As discussed in Appendix H, this alternative is potentially feasible and would meet the basic objectives of the proposed project.

### 5.2.2.1 Environmental Impacts and Mitigation

#### Aesthetics

The proposed project and Alternative B would have similar impacts on aesthetics since access roads for construction sites 116 through 125 would not be visible from public view (see Figure 4.1-4). Construction of the remaining components of Alternative A would have similar impacts on aesthetics compared to the proposed project as construction and operation activities would occur within the same area and would include the same above ground components. Mitigation applicable to the proposed project would be applicable to Alternative B. Impacts on aesthetics during construction under Alternative B would be less than significant with mitigation.

#### Agriculture

The portion of Segment 4 that would be accessed via helicopter, as described under Alternative B, is not located on designated Important Farmland, land zoned for agricultural use, land under a Williamson Act contract, or designated timberland. Tree trimming for the proposed project would not convert forest land area to a non forest use; therefore, Alternative B, which would result in less ground disturbance than the proposed project, would have less of an impact on forest land. Mitigation applicable to the proposed project would be applicable to Alternative B. Impacts on agriculture and forestry resources during construction under Alternative B would be less than significant with mitigation.

#### Air Quality and Greenhouse Gases

Air pollutant and GHG emissions would be generated during the various activities associated with construction of Alternative B from sources similar to the proposed project. Construction methods under Alternative B would vary from the proposed project along Segment 4 within SBCAPCD due to the increased use of helicopters. The increased use of helicopters would reduce the amount of road repair and ground disturbance required along Segment 4 and would result in less PM<sub>10</sub> and PM<sub>2.5</sub> (fugitive dust) emissions. However, the increased use of helicopters associated with the installation of structures along Segment 4 would increase NO<sub>x</sub> and ROG air pollutants and GHG emissions within SBCAPCD.

SBCAPCD has prepared an air quality plan that establishes air quality emissions inventories and controls for ozone NO<sub>x</sub> and ROG sources in the proposed project area. ROG and NO<sub>x</sub> emissions from the proposed project and Alternative B would be primarily from on-site construction equipment, including helicopter operations. As shown in Table 4.3-10, the proposed project's construction emissions in year 2015 would represent approximately 1.9 percent of the regional emissions inventories for NO<sub>x</sub> and 0.16 percent for ROG. In 2016, construction emissions would represent less than 0.1 percent for NO<sub>x</sub> and ROG of each county's emissions inventory. Alternative B would increase NO<sub>x</sub> emissions by approximately 0.11 tons/day and ROG emissions by approximately 0.02

1 tons/day<sup>1</sup>. Alternative B's construction emissions in year 2015 would represent approximately  
2 2.34 percent of the regional emissions inventories for NO<sub>x</sub> and 0.22 percent for ROG.  
3 Therefore, while impacts associated with some pollutants would be lessened due to less ground  
4 disturbance (PM<sub>10</sub> and PM<sub>2.5</sub>), impacts associated with other pollutants would be increased (NO<sub>x</sub>  
5 and ROG), which would result in a similar impact on air quality compared to the proposed project.  
6 In addition, construction sites 116 through 125 are located in a relatively remote area, so emissions  
7 associated with fugitive dust are not likely to impact sensitive receptors. In contrast, NO<sub>x</sub> and ROG  
8 emissions are considered a more regional impact. Therefore, Alternative B's increased NO<sub>x</sub> and  
9 ROG emissions could be considered more impactful than the proposed project's fugitive dust  
10 impacts.

11  
12 As described in Section 4.7.2.3 for the proposed project, all applicable jurisdictions for Alternative B  
13 have not officially adopted Climate Action Plans, policies, or regulations for the purpose of reducing  
14 GHG emissions from non-stationary sources. Direct GHG contributions for the proposed project and  
15 Alternative A are associated with the temporary use of mobile sources and heavy duty diesel-fired  
16 equipment. Alternative A would generate approximately 180 MTCO<sub>2e</sub> (GHG) emissions<sup>2</sup> more than  
17 the proposed project during construction from the increased helicopter use. No new permanent  
18 GHG-emitting equipment would be installed as part of the proposed project or Alternative A.

19  
20 Operation of Alternative B would result in greater air pollutant and GHG emissions than described  
21 for the proposed project, as helicopters would be used to access construction sites 116 through  
22 125. However, the emissions would be infrequent and would not result in a significant impact.

#### 23 24 **Biological Resources**

25 The use of helicopter construction, as described for Alternative B, would avoid the need for road  
26 rehabilitation to access construction sites 116 through 125. The access roads for these construction  
27 sites under the proposed project would cross drainages that have the potential to contain special  
28 status species and are National Marine Fisheries Service (NMFS)-designated critical habitat for  
29 steelhead trout or drainages that flow into NMFS-designated critical habitat (sites 5-11, Figure 4.4-  
30 1). Alternative B would avoid temporary direct impacts on steelhead critical habitat that would  
31 result from riparian vegetation clearing and road widening at Sutton Creek. Alternative B would  
32 avoid the potential for indirect impacts from hazardous materials, increased sediment loads,  
33 barriers to steelhead migration, or loss or degradation of rearing habitat on downstream steelhead  
34 and/or critical habitat. However, because the roads would not be rehabilitated and would continue  
35 to be used for maintenance procedures during operation, some long-term biological impacts would  
36 be greater for Alternative B than the proposed project. In particular, Alternative B would avoid  
37 short-term impacts on one acre of NMFS-designated critical habitat during construction but, unlike  
38 the proposed project, would not improve conditions during operation.

39  
40 The drainages located in between construction sites 116 and 125 have the potential to contain  
41 arroyo chub and provide suitable habitat for the California red legged frog and coast range newt. As  
42 described in Section 4.4, "Biological Resources," road rehabilitation activities associated with the

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<sup>1</sup> ROG and NO<sub>x</sub> emissions that would result from the additional helicopter use were estimated by multiplying the ROG and NO<sub>x</sub> helicopter emissions (lbs. per day) calculated for LST removal, J-Tower footing installation, and J-Tower assembly and erections at site 132 in Appendix C by 10 (construction sites 116 through 125). The sum was then converted into tons per day.

<sup>2</sup> GHG emissions that would result from the additional helicopter use were estimated by multiplying the GHG emissions for LST removal, J-Tower footing installation, and J-Tower assembly and erections at site 132 in Appendix C by 10 (construction sites 116 through 125).

1 proposed project along Segment 4 has the potential to result in direct and indirect impacts on these  
2 species. The risk to these species would be reduced under Alternative B.

3  
4 The increased presence of the helicopters at low elevations would temporary increase impacts on  
5 bird species. However, MMs identified for the proposed project would reduce the potential impacts  
6 on birds to less than significant.

7  
8 Construction of the remaining components of Alternative B would have similar impacts on  
9 biological resources compared to the proposed project as construction activities would occur  
10 within the same area. Mitigation applicable to the proposed project would be applicable to  
11 Alternative B. Impacts on biological resources during construction under Alternative B would be  
12 less than significant with mitigation.

13  
14 Operation of Alternative B would have less of a permanent impact on NMFS-designated critical  
15 habitat compared to the proposed project; however, the proposed project has the potential to  
16 improve baseline conditions with respect to Sutton Canyon. The rehabilitation of the access roads,  
17 as described for the proposed project, would also benefit the geologic stability of the area and  
18 would prevent future landslides and soil erosion events, which would prevent adjacent aquatic  
19 habitat from being contaminated by sediments. Alternative B would also require increased  
20 helicopter use during maintenance and inspection activities, which would result in increased short-  
21 term permanent impacts to birds. Mitigation applicable to the proposed project would be applicable  
22 to Alternative B. Impacts on biological resources from Alternative B would be less than significant  
23 with mitigation.

#### 24 25 **Cultural Resources**

26 Alternative B would include construction activity within the same area as the proposed project and  
27 would not impact any known cultural resources identified in Section 4.5, "Cultural Resources."  
28 Alternative B would reduce the total amount of temporary and permanent ground disturbance (3.8  
29 acres less) required along Segment 4 compared to the proposed project, which would reduce the  
30 potential to disturb a previously undiscovered cultural resource. Mitigation measures applicable to  
31 the proposed project would be applicable to Alternative B. Impacts on cultural resources during  
32 construction under Alternative A would be less than significant with mitigation.

33  
34 Operation of Alternative A would have a similar impact on cultural resources as the proposed  
35 project, considering that operation activities would be the same under each alternative.

#### 36 37 **Geology, Soils, and Mineral**

38 Existing geologic conditions between construction sites 116 and 125 include several areas that are  
39 prone to landslides and soil erosion. The reduced ground disturbance along Segment 4 associated  
40 with Alternative B would reduce the potential for construction of the project to cause or increase  
41 geologic impacts in this area. Construction of the remaining components of Alternative B would  
42 have similar impacts on geology, soils, and minerals compared to the proposed project as  
43 construction and operation activities would occur within the same area. Mitigation applicable to the  
44 proposed project would be applicable to Alternative B. Impacts on geology, soils, and mineral  
45 resources during construction under Alternative B would be less than significant with mitigation.

46  
47 Operation of Alternative B would not have a permanent impact on geology and soils between  
48 construction sites 116 and 125 as no ground disturbance would occur within the area. However,

1 the rehabilitation of the access roads, as described for the proposed project, would benefit the  
2 geologic stability of the area and would prevent future landslides and soil erosion.

#### 4 **Hazards and Hazardous Materials**

5 Alternative B would include the use, transport, and disposal of the same types and generally the  
6 same amount of hazardous materials as the proposed project. Construction of Alternative B would  
7 reduce the use of construction equipment and would occur within the same area as the proposed  
8 project. Therefore, Alternative A and the proposed project would have similar impacts on air  
9 hazards and Cortese List sites, as identified in Section 4.8, "Hazards and Hazardous Materials."  
10 Mitigation applicable to the proposed project would be applicable to Alternative B. Impacts from  
11 hazards and hazardous materials during construction under Alternative B would be less than  
12 significant with mitigation.

13  
14 Operation of Alternative B would have a similar impact from hazards and hazardous materials as  
15 the proposed project, considering that operation activities would be the same under each  
16 alternative.

#### 18 **Hydrology and Water Quality**

19 Alternative B would reduce the total amount of temporary and permanent ground disturbance (3.8  
20 acres less) required along Segment 4 compared to the proposed project, which includes avoiding  
21 six stream crossings (Figure 4.4-1). Therefore, Alternative B would have less of an impact on  
22 increased soil erosion rates, sedimentation of adjacent water bodies, water quality standard  
23 violations, and beneficial uses along these segments during construction. Construction of the  
24 remaining components of Alternative B would have similar impacts on hydrology and water quality  
25 compared to the proposed project as construction activities would occur within the same area.  
26 Impacts on hydrology and water quality during construction under Alternative B would be less than  
27 significant.

28  
29 Operation of Alternative B would not reduce a permanent impact on hydrology and water quality  
30 compared to the proposed project as no ground disturbance would occur in between construction  
31 sites 116 through 125. Alternative B would avoid the use of six stream crossing, which can  
32 potentially contaminate hydrology with sediments, fuels, or oils. However, the rehabilitation of the  
33 access roads, as described for the proposed project, would benefit the geologic stability of the area  
34 and would prevent future landslides and soil erosion events, which would prevent adjacent  
35 hydrologic features from being contaminated by sediments. Mitigation applicable to the proposed  
36 project would be applicable to Alternative B. Impacts on hydrology and water quality during  
37 operation Alternative B would be less than significant with mitigation.

#### 39 **Land Use**

40 Alternative B would occur within the same areas as the proposed project. Therefore, construction  
41 and operation impacts on land use and planning under Alternative B would be the same as  
42 described for the proposed project and would be less than significant.

#### 44 **Noise**

45 Alternative B would include an increase use of helicopters along Segment 4. The only sensitive  
46 receptor within one mile of the structures that would be constructed via helicopter is the Los  
47 Padres National Forest (approximately 0.5 mile). As further detailed in Section 4.11, "Noise," USFS  
48 directive FSH 1909.12 (Land Management Planning Handbook) identifies noise as key criteria for

1 the definition of wilderness areas; however, no specific standards applicable to USFS land uses are  
2 provided within this regulation. Construction sites 116 through 125 are not located on USFS land.  
3 Alternative B would not increase helicopter operations over USFS land during construction  
4 compared to the proposed project and would not create a significant impact. Construction of the  
5 remaining components of Alternative B would have similar impacts from noise as the proposed  
6 project since construction activities would occur within the same area and the same construction  
7 equipment would be used. Mitigation applicable to the proposed project would be applicable to  
8 Alternative B. Impacts from noise during construction of Alternative B would be less than  
9 significant with mitigation.

10  
11 Operation of Alternative B would have a greater impact from noise as the proposed project as  
12 helicopters would need to be used to access construction sites 116 through 125 for regular  
13 maintenance and inspection activities. However, impacts from noise would be less than significant  
14 with mitigation during operation for the same reasons that are discussed above for construction  
15 activities.

### 16 17 **Population and Housing**

18 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would  
19 require a similar number of workers as the proposed project. Alternative B and the proposed  
20 project would largely draw construction workers from the existing population within or near the  
21 project area. Therefore, Alternative B would have a similar impact on population growth during  
22 construction as the proposed project. Alternative B and the proposed project would have similar  
23 impacts on displacement of housing and people as the proposed would occur within the same area.

24  
25 Operation of Alternative A would have a similar impact on population and housing as the proposed  
26 project, considering that operation activities would be the same under each alternative.

### 27 28 **Public Services and Utilities**

29 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would  
30 require a similar number of workers as the proposed project. Alternative B and the proposed  
31 project would largely draw construction workers from the existing population within or near the  
32 project area. Therefore, Alternative B would have a similar impact on population growth during  
33 construction as the proposed project.

34  
35 Alternative B would require less water for dust suppression and road compaction during  
36 construction. Therefore, Alternative B would have a reduced impact on public services and utilities  
37 compared to the proposed project.

38  
39 Operation of Alternative B would have a similar impact on public services and utilities as the  
40 proposed project, considering that operation activities would be the same under each alternative.

### 41 42 **Recreation**

43 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would  
44 require a similar number of workers as the proposed project. Alternative B and the proposed  
45 project would largely draw the construction worker from the existing population within or near the  
46 project area. Therefore, Alternative B would have a similar impact on population growth during  
47 construction as the proposed project. Therefore, Alternative B would have a similar impact on  
48 recreation facilities during construction as the proposed project.

1  
2 Operation of Alternative B would have a similar impact on recreation as the proposed project,  
3 considering that operation activities would be the same under each alternative.

4  
5 **Traffic**

6 Alternative B would reduce the number of construction equipment vehicles required on site  
7 compared to the proposed project, because workers, equipment, and materials would be  
8 transported to construction sites 116 through 125 via helicopter. The increased helicopter use  
9 would reduce the need for construction vehicle and equipment trips, which would reduce the  
10 anticipated number of daily peak hour trips below the 44 peak hour trips that are proposed for the  
11 proposed project. The Santa Barbara County CMP is not applicable to traffic associated with  
12 construction. Alternative B would have a less of an impact on applicable congestion management  
13 program standards and circulation systems plan and policies. Alternative B would have an  
14 increased impact on air traffic patterns compared to the proposed project. Implementation of  
15 MM TT-2 and MM TT-3 would reduce impacts from the increased helicopter use to less than  
16 significant. Impacts from hazardous road design would also be similar for both alternatives as the  
17 same oversized vehicles would be used to deliver materials and the same access roads would be  
18 used (with the exception of the access roads that are used to access construction sites 116 through  
19 125) under each alternative. Mitigation measures applicable to the proposed project would be  
20 applicable to Alternative B. Impacts on traffic and transportation during construction under  
21 Alternative B would be less than significant.

22  
23 Operation of Alternative B would have a greater impact on air traffic compared to the proposed  
24 project as helicopters would need to be permanently used to access construction sites 116 through  
25 125 for regular maintenance and inspection activities. However, impacts on air traffic would be less  
26 than significant with mitigation during operation for the same reasons that are discussed for  
27 construction activities. Alternative B would not impact emergency access between construction  
28 sites 116 and 125; however, the proposed project would improve permanent emergency access to  
29 the area as a result of the road rehabilitation.

30  
31 **Cumulative Impacts**

32 All of the same cumulative projects identified in Section 6, "Cumulative Impacts and Other CEQA  
33 Consideration" for the proposed project would occur under Alternative B. Therefore, cumulative  
34 impacts for Alternative B would be the same as described for the proposed project and would be  
35 less than significant.

36  
37 **Growth Inducing**

38 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would  
39 require a similar number of workers as the proposed project. Alternative B and the proposed  
40 project would largely draw the construction worker from the existing population within or near the  
41 project area. Therefore, Alternative B would have similar temporary impact on population growth  
42 during construction as the proposed project.

43  
44 Operation of Alternative B would not directly or indirectly contribute to population growth.  
45 Alternative B would not require additional long-term staffing. Alternative B would not induce  
46 additional electrical consumption. Rather, Alternative B, similar to the proposed project, would  
47 meet emergency electrical demands of the Santa Barbara South Coast area, while enhancing  
48 operational flexibility.

1  
2 **5.2.3 No Project Alternative**  
3

4 This section compares the environmental impacts of the proposed project with those of the No  
5 Project Alternative. The No Project Alternative involves the circumstances under which the  
6 proposed project does not proceed. Pursuant to CEQA Guidelines Section 15126.6(e), the following  
7 qualitative analysis takes into consideration events and actions that would be reasonably expected  
8 to occur in the foreseeable future if the proposed project were not approved.  
9

10 **5.2.3.1 Environmental Impacts and Mitigation**  
11

12 Under the No Project Alternative, no construction activities would occur and the existing 66-kV  
13 subtransmission system and substations would continue to operate under current conditions.  
14 Foundations and topped poles along Segments 1, 2, and 3A would remain in place and access roads  
15 would not be repaired. The No Project Alternative would not impact any of the environmental  
16 baseline conditions. Significant impacts on NMFS-designated critical habitat, special status species  
17 and other vegetation communities including riparian habitat from construction of the proposed  
18 project would be avoided. Less than significant impacts from construction of the proposed project  
19 on cultural resources; from noise; and on traffic would also be avoided. The No Project  
20 Alternative would be environmentally superior in comparison to the proposed project with regard  
21 to all environmental resources. The No Project Alternative would have similar growth-inducing  
22 impacts compared to the proposed project as both alternatives would have no impact.  
23

24 **5.3 Environmentally Superior Alternative**

25 The No Project Alternative would be environmentally superior for all environmental resources.  
26 However, when the Environmentally Superior Alternative is the No Project Alternative, CEQA  
27 requires the identification of an Environmentally Superior Alternative among the other alternatives  
28 (CEQA Guidelines Section 15126.6).  
29

30 Determinations are provided that indicate whether the proposed project or an alternative would be  
31 environmentally superior for each resource area. Where the analysis determines that impacts  
32 would be similar to the proposed project, the proposed project is selected as environmentally  
33 superior for that resource area by default. Table 5-1 provides a summary of the determinations.  
34

35 **Aesthetics**

36 Alternatives A and B would have similar impacts on aesthetics as the proposed project. Although  
37 Alternative A, would maintain topped poles along SR 192, the presence of these poles are  
38 considered part of the environmental baseline and would not result in an impact. Alternative B,  
39 would avoid access roads from being reestablished along Segment 4; however, these roads would  
40 not be visible from public view and would not result in a greater impact. Therefore, the proposed  
41 project would be the environmentally superior alternative for the permanent impacts on aesthetics.  
42

43 **Agriculture and Forestry Resources**

44 Alternatives A and B would have similar impacts on agriculture and forestry resources as the  
45 proposed project. Although Alternative A would maintain topped poles within Important Farmland,  
46 the presence of these poles are considered part of the environmental baseline and would not result  
47 in an impact. Alternative B would eliminate access road upgrades along Segment 4; however, site  
48 preparation activities would still be required at specific tower locations. While access roads are



1 existing and tree removal would likely not be required for road construction for the proposed  
2 project, tree removal may still be required for site preparation activities. Therefore, impacts on  
3 agriculture and forestry resources would be similar for all alternatives, and the proposed project  
4 would be the environmentally superior alternative for permanent impacts on agriculture and  
5 forestry resources.

6  
7 **Air Quality and GHG**

8 Alternative A would decrease the use of construction equipment and ground disturbance compared  
9 to the proposed project, which would reduce the total air pollutant and GHG emissions; however,  
10 the reduction would not be substantial. Alternative B would reduce road construction and increase  
11 helicopter use compared to the proposed project during construction and operation, which would  
12 result in a reduction in PM<sub>10</sub> and PM<sub>2.5</sub> but an increase in NO<sub>x</sub>, ROG, and GHG emissions. Therefore,  
13 Alternative A would be the environmentally superior alternative for temporary impacts on air  
14 quality and GHG.

15  
16 **Biological Resources**

17 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)  
18 required along Segments 1, 2, and 3A compared to the proposed project. Alternative B would  
19 reduce the total amount of temporary and permanent ground disturbance required along  
20 Segment 4 (3.8 acres less) compared to the proposed project. Alternative B would avoid direct  
21 impacts on NMFS-designated critical habitat during construction; however, unlike the proposed  
22 project, Alternative B would not improve conditions during operations. Alternative A would have  
23 less potential impacts on birds resulting from increased helicopter use compared to Alternative B.  
24 Therefore, Alternative A would be the environmentally superior alternative for the permanent  
25 impacts on biological resources.

26  
27 **Cultural Resources**

28 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)  
29 required along Segments 1, 2, and 3A compared to the proposed project. Alternative B would  
30 reduce the total amount of temporary and permanent ground disturbance required along  
31 Segment 4 (3.8 acres less) compared to the proposed project. Alternative A would prevent more  
32 area from being disturbed, which would result in a lower risk to disturbing a previously  
33 undiscovered cultural resources. Therefore, Alternative A would be the environmentally superior  
34 alternative for the permanent impacts on cultural resources.

35  
36 **Geology, Soils, and Minerals**

37 Alternative A would maintain topped poles that have a risk of loss or injury during a seismic or  
38 other geologic event; however, the presence of these poles are considered part of the  
39 environmental baseline and would not result in an impact. Alternative B would avoid temporary  
40 impacts from the reestablishment of access roads but would not result in the long-term beneficial  
41 impact on geologic stability and reduced soil erosion. In contrast, both the proposed project and  
42 Alternative A would improve the geologic stability along access roads and would prevent future  
43 landslide and soil erosion events. Therefore, the proposed project would be the environmentally  
44 superior alternative for the permanent impacts on geology, soils, and minerals.

1 **Hazards and Hazardous Materials**

2 Alternatives A and B would include the use, transport, and dispose of the same types and generally  
3 the same amount of hazardous materials as the proposed project. Alternatives A and B would  
4 include the use of the same construction equipment and material and would occur within the same  
5 area as the proposed project. Therefore, the proposed project would be the environmentally  
6 superior alternative for the temporary impacts on hazards and hazardous materials.  
7

8 **Hydrology and Water Quality**

9 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)  
10 required along Segments 1, 2, and 3A compared to the proposed project. Alternative B would  
11 reduce the total amount of temporary and permanent ground disturbance required along  
12 Segment 4 (3.8 acres less). Alternative A would improve the geologic stability along the access  
13 roads between construction sites 116 and 125 and would prevent future landslide and soil erosion  
14 events, which would prevent adjacent hydrologic features from being contaminated with  
15 sediments. Alternative B would permanently avoid direct impacts on six streams and indirect  
16 impacts on those streams from sediments, fuels, or oil contaminants. Alternative B would be the  
17 environmentally superior alternative for the permanent impacts on hydrology and water quality.  
18

19 **Land Use and Planning**

20 Alternatives A and B would occur within the same areas as the proposed project. Therefore, the  
21 proposed project would be the environmentally superior alternative for the permanent impacts on  
22 land use and planning.  
23

24 **Noise**

25 Alternative A would reduce temporary ambient noise level increases along Segment 3A during  
26 construction compared to the proposed project. Alternative B would increase temporary ambient  
27 noise levels along Segment 4 during construction and operations compared to the proposed project.  
28 Therefore, Alternative A would be the environmentally superior alternative for the  
29 temporary impacts from noise.  
30

31 **Population and Housing**

32 Alternatives A and B would require a similar number of workers, which would be drawn from  
33 existing populations within or near the project area, as the proposed project. Therefore, the  
34 proposed project would be the environmentally superior alternative for the temporary impacts on  
35 land use and planning.  
36

37 **Public Services and Utilities**

38 Alternatives A and B would require a similar number of workers, which would be drawn from  
39 existing populations within or near the project area, as the proposed project. However,  
40 Alternative B would require less water for dust suppression and soil compaction. Therefore,  
41 Alternative B would be the environmentally superior alternative for the temporary impacts on  
42 public services and utilities.  
43

44 **Recreation**

45 Alternatives A and B would require a similar number of workers, which would be drawn from  
46 existing populations within or near the project area, as the proposed project. Therefore, the

1 proposed project would be the environmentally superior alternative for the temporary impacts on  
2 recreation facilities.

3  
4 **Traffic and Transportation**

5 Alternatives A and B would result in fewer daily peak hour trips during construction compared to  
6 the proposed project. Alternative A would also reduce the temporary impact on the type III bike  
7 trail along SR 192 during construction. Alternative B would result in a greater temporary impact on  
8 air traffic during construction and operations. Therefore, Alternative A would be the  
9 environmentally superior alternative for the temporary impacts on traffic and transportation.

10  
11 **Cumulative Impacts**

12 Alternatives A and B would be similar to the cumulative impacts of the proposed project. Therefore,  
13 the proposed project would be the environmentally superior alternative for the temporary and  
14 permanent cumulative impacts.

15  
16 **Growth Inducing**

17 Alternatives A and B would require a similar number of workers, which would be drawn from  
18 existing populations within or near the project area, as the proposed project. Alternatives A and B  
19 would have similar indirect impacts on population growth as the proposed project. Therefore, the  
20 proposed project would be the environmentally superior alternative for the temporary and  
21 permanent impacts on population growth.

22  
23 **5.4 Conclusion**

The proposed project would be the environmentally superior alternative for nine of the resources by default, which means Alternatives A and B would have similar impacts as the proposed project. Alternative A would be the environmentally superior alternative for six of the resources, including the significant air quality impact. Alternative B would be the environmentally superior alternative for two resources but would result in similar air quality impacts to the proposed project. Although air emissions are reduced under Alternative A, the reduction is minimal considering that the majority of the air impacts would result from project activities that would occur under both alternatives. Further, the air emissions reductions that would result from leaving old components in place are not considered substantial enough to justify implementation of Alternative A. Although Alternative A would result in a slight reduction in the significant short-term air quality impact, the long-term benefit of removing abandoned infrastructure and rehabilitating small portions of the project area would outweigh the minor short-term emissions reductions. Therefore, the proposed project is considered the environmentally superior alternative.

1

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