7.0 Environmental Impacts of the Past Work Along Segment 3A

7.1 Background

As discussed in Chapter 1, "Introduction," and further described in Chapter 6, "Cumulative Impacts," Southern California Edison (SCE, or the applicant) commenced construction on unpermitted upgrades along Segments 1, 2, and 3A and several surrounding substations between 1999 and 2004 (see Section 6.1.2). Segment 3A is located within the California Coastal Zone. Development in the Coastal Zone requires Santa Barbara County's discretionary approval of a Coastal Development Permit (CDP) and a California Environmental Quality Act (CEQA) review. Although CEQA does not require review of prior unpermitted activity (*Fat v. County of Sacramento* [2002] 97 Cal.App.4th 1270; *Riverwatch v. County of San Diego* [1999] 76 Cal.App.4th 1428), the County will require the CDP to cover both the proposed project and the past work in the Coastal Zone (Segment 3A).

To facilitate Santa Barbara County's review of the CDP application, this chapter analyzes the nature and extent of the environmental impacts from the past work within the Coastal Zone (Segment 3A) by comparing current environmental and regulatory conditions to conditions as they existed at the time the past work commenced in 1999. The purpose of this analysis is to support Santa Barbara County's CDP process by identifying any significant long-term impacts that may have resulted from the past work along Segment 3A. The analysis is based on information that was compiled from the Proponent's Environmental Assessment, the applicant's responses to data requests, previous field investigations conducted by the applicant, and estimates based on available GIS data. The California Public Utilities Commission (CPUC) independently prepared this analysis, and it is not based on any assumed impacts. Given the elapsed time between previous activities and the present proposed project, a good faith effort was made to gather a reasonable level of data to characterize impacts; however, environmental conditions prior to 1999 are unknown for many resource areas or would be unreasonably onerous to identify (CEQA Guidelines, Section 15144, 15145, and 15151).

The analysis in this chapter also provides a brief, generally qualitative analysis of short-term impacts of the past work but does not attempt to identify or quantify the significance of such impacts due to the difficulty of obtaining relevant data retroactively and the inability to address such impacts through the County's CDP process.

This analysis also includes project options that would modify the design of the proposed project along Segment 3A in order to reduce long-term significant impacts. Similar to the alternatives to the proposed project discussed in Chapter 3, project options were identified and screened in the Screening Report (Appendix H) using the same CEQA screening criteria to determine whether each option would reduce a significant long-term impact, meet most of the objectives of the proposed project, and be potentially feasible. The term "option" is used to differentiate them from the alternatives of the proposed project as they are not required under the CEQA Guidelines (Section 15126.6(a)).

7.2 Description of Past Work Along Segment 3A

Segment 3A originates at Carpinteria Substation and terminates at the border of Santa Barbara County and Ventura County. The linear length of this segment is approximately 3.7 miles (Figure 2-1c). The past construction activities along Segment 3A include the following components:

- Approximately 32 existing wood poles along Segment 3A were not replaced; the condition of these poles was determined to be sufficient to support the new conductor, and the only work conducted on these poles was the installation of the new conductor.
- Forty-nine new lightweight steel (LWS) poles were installed to replace approximately 49 wood subtransmission poles that previously supported 66-kilovolt (kV)facilities. Work on these poles included the installation of new conductor and the transfer of distribution circuits.
- With respect to the pre-existing 49 wood subtransmission poles, 34 of these wood subtransmission poles were removed entirely, and 17 of them were "topped" by removing the upper portion of the pole, thus leaving shorter poles in place on which 16-kV distribution circuits and third-party telecommunications facilities remain.
- Approximately 19,500 feet of single-circuit 954 stranded aluminum conductor (SAC) was installed, replacing 653 aluminum conductor steel-reinforced (ACSR) conductor.
- One tubular steel pole (TSP) was installed at the eastern terminus of Segment 3A; this TSP replaced an existing wood pole.
- Approximately five wood guy stubs with heights between 20 and 30 feet were replaced with five new wood guy stubs with heights between 25 and 40 feet.

Construction methods along Segment 3A were similar to the pole and conductor replacement for the proposed project, as described in Section 2.3, "Construction." The work likely required the establishment of temporary staging areas, which were used as reporting locations for workers, vehicle and equipment parking, and material storage. Similar to the staging yards for the proposed project, some of the staging areas were previously disturbed; however, the exact nature and location of temporary staging yards is unknown.

Limited access and spur roads restoration, including re-grading and repair of the existing roadbed, was likely required as most of the segment is located adjacent to an existing road; however, without baseline data related to road conditions prior to construction, it is unknown to what extent the roads were upgraded. Therefore, long-term disturbance related to road work cannot be calculated.

Operation and maintenance activities associated with the existing subtransmission along Segment 3A are similar to the operation and maintenance activities that were performed for the subtransmission structures and conductors that existed prior to 1999 and to the operation and maintenance activities described for the proposed project in Section 2.5, "Operation and Maintenance." Routine inspections, access road maintenance, tree trimming, and insulator washing were conducted on an annual or as needed basis, similar to current operations. The subtransmission lines were and continue to be maintained in a manner consistent with CPUC General Order (GO) 95.

7.3 Environmental Impacts

7.3.1 Aesthetics

Impact AE-A: Have a substantial adverse effect on a scenic vista.

NO IMPACT

As stated in Section 4.1.1.5., there are no designated scenic vistas in the project area within Santa Barbara County. Therefore, there is no long-term impact on scenic vistas.

Impact AE-B: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
SIGNIFICANT

The eastern end of Segment 3A crosses over State Route (SR) 150, which is an eligible state scenic highway (Caltrans 2012). Activities associated with construction of the existing subtransmission line along Segment 3A temporarily damaged scenic resources within viewsheds of SR 150 because construction activities were visible to sensitive viewers. However, this impact was short term and less than significant.

Of the five structures that run parallel to SR 150, three of the wood poles were replaced with LWS poles, one wood pole was replaced with a TSP, and one wood pole was left in place. Although the exact height of the old poles is unknown, LWS poles are typically up to 15 feet taller than wood poles. TSPs are up to 85 feet taller than wood poles.

Prior to construction, SR 150 provided views of high scenic quality, intactness, vividness, and unity in this area. The vertical forms and lines of the wood poles with horizontal cross members and conductors contrasted somewhat with the dominant forms and lines in the rural/natural landscape; however, their dark reddish-brown color helped balance them with their surroundings, and they appeared generally in scale and character with other rural elements and the landscape as a whole. Also, wood power poles often appear as common elements within rural landscapes. The LWS poles and TSP that were installed between 1999 and 2004 are lighter in color than the wood poles and tend to contrast more with their surroundings than the wood poles that they replaced. The LWS poles and TSP appear as encroaching elements that are out of scale and character with the rural/ natural scene (see Figure 7-1). The contrast of the new poles reduces the intactness and unity of the view along SR 150.

Motorists traveling along SR 150 include local residents, commuters, and recreationalists and have moderately high sensitivity to changes in scenic resources. Therefore, long-term impacts to the visual quality of scenic resources along SR 150 from the four new structures are considered significant.

Impact AE-C: Substantially degrade the existing visual character or quality of the site and its surroundings.
SIGNIFICANT

Activities associated with construction of the existing subtransmission line along Segment 3A were visible to the public. However, these impacts were short term and less than significant.

Figure 7-2 compares Segment 3A (SR 192/Casitas Pass Road) conditions as they existed prior to construction of the existing subtransmission line to the existing conditions along SR 192/Casitas Pass Road. Prior to the past work along Segment 3A, wood poles lined SR 192/Casitas Pass Road. This portion of the roadway and surrounding area was characterized by near views of orchards, trees, and agricultural operations and background views of coastal hills and ridges. The combination of rural and natural character provided views of high scenic quality, intactness, vividness, and unity in this area. Similar to the discussion provided for Impact AE-B, the vertical forms and lines of the wood poles with horizontal cross members and conductors contrasted with the dominant forms and lines in the rural/natural landscape; however, their dark reddish-brown color helped blend them with their surroundings. They appeared generally in scale and character

with other rural elements and the landscape as a whole. Moreover, wood power poles often appear as common elements within rural landscapes. The taller galvanized metal poles introduced into the landscape in this area appear as encroaching elements that are out of scale and character with the rural/natural scene. Although their forms and lines are similar to those of the wood structures, they are taller, and their color and finish texture contrast with their surroundings and cause them to be more noticeable. Although the introduction of the taller metal poles slightly reduced the unity of views within the area, they substantially reduced intactness, vividness, and the overall scenic quality of these views.

Figure 7-1 Existing Condition of Scenic Resources along SR 150

Clockwise, starting at the top: Views of Segment 3A from SR 150 (north); View from SR 150 (north); View from SR 150 (south)
Source: SCE 2012

Figure 7-2 Casitas Pass Road (Prior to the Past Work Along Segment 3A and Existing Conditions)

Left to right: On the left, pre-2004 wooden poles; On the right, post-2004 LWS poles

Viewer sensitivity along this segment ranges from moderately high to high due to the large number of motorists that frequently travel along SR 192/Casitas Pass Road and from the long duration views of surrounding residents. Additionally, the City of Carpinteria has identified SR 192/Casitas Pass Road as a potential future scenic highway (City of Carpinteria 2003). Therefore, the aesthetic impact of introducing the metal subtransmission poles along and in the vicinity of SR 192/Casitas Pass Road is considered a significant long-term impact.

Similar to the poles along SR 192/Casitas Pass Road, wood poles were located on private property between Shepard Mesa Road and SR 192 prior to the past work along Segment 3A. Residents' views within this portion of Segment 3A include orchards, trees, and agricultural operations and background views of coastal hills and ocean. The high intactness, vividness, and unity of the combination of rural and natural character provided high scenic quality. For the same reasons discussed for SR 192/Casitas Pass Road, the taller galvanized metal poles appear as encroaching elements that are out of scale and character with the rural/natural scene compared to the previous wood poles. Viewer sensitivity along this segment is very high due to the several residents with permanent views of the area. Therefore, the aesthetic impact of the metal subtransmission poles within the Shepard Mesa area is considered long term and significant.

Impact AE-D: Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.
LESS THAN SIGNIFICANT

Reflective construction equipment and materials may have generated glare during daytime hours. Construction of the existing subtransmission line along Segment 3A primarily occurred during daytime hours. However, there is a possibility that some construction occurred at night and temporary artificial illumination could have been required. Potential impacts from glare or lighting during construction would have been temporary and less than significant.

Operation of the existing subtransmission line along Segment 3A has not created a new impact from lighting. The new conductor was reflective when it was first installed, but has weathered to a dull gray finish. The LWS structures are non-specular (non-reflective) structures. Therefore, long-term impacts under this criterion are less than significant.

7.3.2 Agriculture and Forestry

IMPACT AG-A: Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to Non-Agricultural Use
LESS THAN SIGNIFICANT

Activities associated with construction may have temporarily occurred on designated Important Farmland[1]. However, these impacts were short-term and less than significant because agricultural operations returned to normal upon completion of construction.

Of the 17 poles that were topped and remained in place along Segment 3A, 11 poles are located on Important Farmland (two poles on Unique Farmland and nine on Prime Farmland) (CDC 2010). Because they were not removed, the topped poles resulted in the conversion of approximately 0.001 acres of Important Farmland, which is considered less than significant. The remaining wood poles along Segment 3A that were replaced were replaced one-for-one within an existing right-of-way (ROW) and did not convert additional Important Farmland to non-agricultural use. Therefore, long-term impacts under this criterion are less than significant.

IMPACT AG-B: Conflict with existing zoning for agricultural use or a Williamson Act Contract
LESS THAN SIGNIFICANT

As discussed in Section 4.10, "Land Use and Planning," most of Segment 3A within unincorporated Santa Barbara County is located on lands zoned for agricultural use (Santa Barbara County 2006). Additionally, most of this same area is under Williamson Act contracts (CDC 2010). However, past work along Segment 3A occurred within an existing ROW and did not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, long-term impacts under this criterion are less than significant.

[1] Important Farmland is defined and designated by the California Department of Conservation as Prime, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance.

IMPACT AG-C: Conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production
NO IMPACT

As discussed in Chapter 4.2, "Agriculture and Forestry," Segment 3A is not located on land designated as forest land, timberland, or timberland zoned Timberland Production. Therefore, there is no long-term impact under this criterion.

IMPACT AG-D: Result in the loss of forest land or conversion of forest land to non-forest use
NO IMPACT

Construction of the existing subtransmission line along Segment 3A occurred within an existing ROW, and the long-term presence of the transmission line has not caused tree coverage to drop below 10 percent. Therefore, there is no long-term impact under this criterion.

IMPACT AG-E: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use
LESS THAN SIGNIFICANT

Construction vehicle traffic along private roads, agricultural roads, and access and spur roads may have resulted in a temporary increase in traffic that may have disrupted farming and grazing activities. Although agricultural activities may have been temporarily impacted, the previous construction did not result in the permanent conversion of farmland to non-agricultural use because the level of agricultural use is roughly similar to what it was before construction. No other activities involved changes in the existing environment that could result in conversion of Farmland to nonagricultural use or forest land to non-forest use. Therefore, long-term impacts under this criterion are less than significant.

7.3.3 Air Quality

Impact AQ-A: Conflict with or obstruct implementation of the applicable air quality plan.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A generated emissions from operation of heavy equipment and support vehicles. The applicant estimated annual construction air pollutant emissions for past work along Segment 3A using the California Emission Estimator Model (CalEEMod) model for both on-road and off-road sources. A summary of estimated emissions for the past work along Segment 3A is presented in Table 7-1. A complete listing of the calculations and assumptions for the estimated emissions is included in Appendix C. The Santa Barbara County Air Pollution Control District's (SBCAPCD's) primary means of implementing air quality plans is the adoption of rules and regulations. The emissions associated with construction of the past work along Segment 3A were temporary and represented a very small fraction of the regional emission inventory. As a result, construction emissions did not substantially contribute to the regional emissions or obstruct the implementation of the air quality plan.

Table 7-1 Summary of Estimated Annual Past Work Along Segment 3A Emissions (tons/year)

ROG	NO_x	PM_{10}	$PM_{2.5}$
1.74	14.34	0.95	0.95

Source: SCE 2012

Key:
NO_X nitrogen oxide
PM_{10} Particulate matter less than 10 microns
$PM_{2.5}$ Particulate matter less than 2.5 microns
ROG reactive organic matter

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the subtransmission line prior to the work performed between 1999 and 2004. Therefore, long-term impacts under this criterion are less than significant.

Impact AQ-B: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
LESS THAN SIGNIFICANT

The SBCAPCD currently recommends that emissions be offset if emissions exceed 25 tons per year for reactive organic gases (ROG), oxides of nitrogen (NO_x), particles 10 microns in diameter or smaller (PM_{10}), or particles 2.5 microns in diameter or smaller ($PM_{2.5}$) SBCAPCD 2008). As shown in Table 7-1, estimated construction emissions for the past work along Segment 3A did not exceed annual emissions thresholds for any criteria pollutant. Additionally, the applicant states that fugitive dust control measures required by the SBCAPCD (further discussed in Section 4.3, "Air Quality") were implemented during the past work along Segment 3A (SCE 2012).

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the subtransmission line prior to the work performed between 1999 and 2004. No stationary emissions sources are associated with the existing subtransmission line. Therefore, long-term impacts under this criterion are less than significant.

Impact AQ-C: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A resulted in NO_x and ROG (O_3 precursors) emissions associated with fuel combustion from the operation of construction equipment. As presented in Table 7-1, emissions of these pollutants were below the thresholds that would have triggered emission control measures pursuant to SBCAPCD regulations (as discussed under Impact AQ-B).

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, long-term impacts under this criterion are less than significant.

Impact AQ-D: Expose sensitive receptors to substantial pollutant concentrations.
LESS THAN SIGNIFICANT

The predominant types of receptors located within 1 mile of Segment 3A include single-family residences, schools, places of worship, and local parks (see Section 4.11, "Noise," Table 4.11-2). Similar to the proposed construction discussed in Section 4.11, sensitive receptors located in proximity to past construction areas could have been exposed to criteria air pollutants and diesel particulate matter.[2] However, pollutant emissions were short-term, distributed throughout Segment 3A, and were not concentrated in any one area.
Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. The long-term impacts under this criterion are less than significant.

Impact AQ-E: Create objectionable odors affecting a substantial number of people.
LESS THAN SIGNIFICANT

Vehicle exhaust was the primary odor associated with construction of the existing subtransmission line along Segment 3A. Vehicle exhaust from construction vehicles, when perceptible, was common in the environment, dissipated rapidly as it mixed with the surrounding air, and had very limited duration.

Operation and maintenance activities associated with the past work along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to 1999. Therefore, long-term impacts under this criterion are less than significant.

7.3.4 Biological Resources

Impact BIO-A: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
UNDETERMINABLE

The applicant did not complete biological surveys along Segment 3A prior to the start of the past work. Without baseline data related to the presence of biological resources prior to construction, it is unknown to what extent the construction of the existing subtransmission line along Segment 3A could have impacted biological resources. Therefore, short- and long-term impacts that may have resulted due to construction activities are undeterminable.

Operations and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, long-term impacts under this criterion from operation of the existing subtransmission line are less than significant.

[2] A toxic air contaminant produced by diesel-fueled vehicles and equipment that is also classified as a subset of PM_{10} and $PM_{2.5}$ emissions

Impact BIO-B: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?
UNDETERMINABLE

See Impact BIO-A.

Impact BIO-C: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
UNDETERMINABLE

See Impact BIO-A.

Impact BIO-D: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
UNDETERMINABLE

See Impact BIO-A.

Impact BIO-E: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
NO IMPACT

The applicant estimates that 12 trees were trimmed during construction, but no trees were removed (SCE 2012). No applicable tree preservation policies or ordinances would apply to the tree trimming.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, there is no long-term impact under this criterion.

7.3.5 Cultural Resources

Impact CR-A: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
UNDETERMINABLE

The applicant did not complete cultural surveys along Segment 3A prior to the start of construction of the existing subtransmission line. As detailed in Chapter 4.5, "Cultural Resources," cultural surveys were conducted along Segment 3A in 2012 and did not identify any cultural resources (SCE 2012). There are no records of cultural resources discovered during the past work along Segment 3A, and the land was previously disturbed due to agricultural activities and the presence of existing residences. However, without baseline data related to the presence of cultural resources prior to construction, it is unknown to what extent cultural resources could have been impacted. Therefore, both short and long-term impacts on cultural resources, while unlikely, are undeterminable.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, long-term impacts from operation under this criterion are less than significant.

Impact CR-B: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
UNDETERMINABLE

See Impact CR-A.

Impact CR-C: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
UNDETERMINABLE

See Impact CR-A.

Impact CR-D: Disturb any human remains, including those interred outside of formal cemeteries.
UNDETERMINABLE

See Impact CR-A.

7.3.6 Geology and Soils

Impact GEO-A: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides.
LESS THAN SIGNIFICANT

As discussed in Section 4.6, "Geology, Soils, and Minerals," Segment 3A is not within an A-P Zone (see Figure 4.6-1); however, Segment 3A is located in a seismically active area and could experience moderate to high levels of earthquake-induced ground shaking. Segment 3A is located in areas identified by Santa Barbara County as having moderate liquefaction potential, low landslide potential, moderate geologic problem area characteristics, and low collapsible soils (Santa Barbara County 2010).

The work in Segment 3A involved the installation of 49 LWS poles and one TSP. LWS poles are steel poles that are direct embedded into the ground, typically into native soil. The LWS poles fall under the requirements of CPUC GO 95[3] Rule 49.1c and Table 6. SCE determined the soils in Segment 3A to be "firm soil" per Rule 49.1c and set the LWS poles in accordance with GO 95. No further geotechnical investigation was performed for the LWS poles along Segment 3A. SCE installed the TSP in accordance with the findings and recommendations provided in the geotechnical investigation (SCE 2001) that covered the TSP location (SCE 2012). Therefore, long-term impacts under this criterion are less than significant.

[3] GO 95 details the CPUC's rules governing overhead line design, construction, and maintenance.

Impact GEO-B: Result in substantial soil erosion or the loss of topsoil.
UNDETERMINABLE

Soils along Segment 3A are generally loamy with varying proportions of clay, silt, sand, and gravel/cobbles/stones (NCRS 2008). The soils along Segment 3A have an erosion hazard rating that ranges from low to severe (Santa Barbara County 2010). Construction of the past work along Segment 3A included ground disturbance and grading, and the applicant did not prepare or implement a Storm Water Pollution Prevention Plan (SWPPP) during construction. Without baseline data or data related to a grading plan or the implementation of measures to prevent erosion, it is unknown to what extent the past work along Segment 3A could have resulted in soil erosion or the loss of topsoil. Therefore, short- and long-term impacts from the loss of topsoil during construction are undeterminable.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, long-term impacts from operation under this criterion are less than significant.

Impact GEO-C: Be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
LESS THAN SIGNIFICANT

Segment 3A is located in areas identified by Santa Barbara County as having moderate liquefaction potential, low landslide potential, moderate geologic problem area, and low collapsible soils (Santa Barbara County 2010). As discussed regarding Impact GEO-A, the LWS poles along Segment 3A were installed in accordance with GO 95. SCE installed the TSP in accordance with the findings and recommendations provided in the geotechnical investigation (SCE 2001) that covered the TSP location (SCE 2012). The CPUC assumes that the existing subtransmission line along Segment 3A was constructed in compliance with all applicable building codes. Therefore, long-term impacts under this criterion are less than significant.

Impact GEO-D: Be located on expansive soil, creating substantial risks to life or property.
LESS THAN SIGNIFICANT

As discussed in Section 4.6, "Geology and Soils," (see Table 4.6-2), expansive soils along Segment 3A are low to moderate. As discussed in Impact GEO-A, the LWS poles along Segment 3A were installed in accordance with GO 95. SCE installed the TSP in accordance with the findings and recommendations provided in the geotechnical investigation (SCE 2001) that covered the TSP location (SCE 2012). The CPUC assumes that the existing subtransmission line along Segment 3A was constructed in compliance with all applicable building codes. Therefore, long-term impacts under this criterion are less than significant.

7.3.7 Greenhouse Gases

Impact GHG-A: Direct and Indirect GHG Emission Levels
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A directly contributed to local and regional greenhouse gas (GHG) emissions. SCE estimated that approximately 514 metric tons of carbon dioxide equivalent (MTCO2e) were emitted during the construction of Segment 3A (SCE

2012). As further described in Section 4.7, "Greenhouse Gases," the most applicable GHG significance criteria are those set by the South Coast Air Quality Management District (SCAQMD) interim GHG significance thresholds adopted in 2008 (SCAQMD 2008). The applicable SCAQMD-recommended GHG emission threshold is 10,000 MTCO2e per year, including construction emissions amortized over 30 years and added to operational GHG emissions.

GHG construction emissions from the past work along Segment 3A amortized over 30 years would be approximately 17 MTCO2e. These GHG emissions are well below the applicable thresholds of significance. Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, operations and maintenance procedures along Segment 3A have not generated GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, long-term impacts under this criterion are less than significant.

Impact GHG-B: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.
LESS THAN SIGNIFICANT

As described in Section 4.7, "Greenhouse Gas Emissions," Santa Barbara County has not officially adopted Climate Action Plans, policies, or regulations for the purpose of reducing GHG emissions from non-stationary sources. At the state level, a scoping plan, approved by the California Air Resources Board (CARB) on December 12, 2008, provides the outline for actions to reduce California's GHG emissions. The scoping plan now requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHG emissions (CARB 2008). Although the existing subtransmission line along Segment 3A was constructed prior to approval of the CARB scoping plan, the past work along Segment 3A, as described by the applicant, did not conflict with any of the policies or GHG emission reduction measures outlined in the scoping plan. In addition, operation and maintenance of the existing subtransmission line do not conflict with a federal, state, regional, or local plan, policy, or regulation for reducing GHG emissions. Therefore, long-term impacts under this criterion are less than significant.

7.3.8 Hazards and Hazardous Materials

Impact HZ-A: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
NO IMPACT

Construction of the existing subtransmission line along Segment 3A involved transport, use, and disposal of hazardous materials. This included the use of hazardous materials typically used by construction vehicles and heavy equipment (e.g., gasoline, diesel fuel, transmission fluid), primarily within the subtransmission line ROW. Without information regarding hazardous material handling procedures, it is unknown if the hazardous materials created a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, there is no long-term impact under this criterion.

Impact HZ-B: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
NO IMPACT

As described under Impact HZ-A, construction of the existing subtransmission line along Segment 3A involved transport, use, and disposal of hazardous materials. Without information regarding hazardous material handling procedures, it cannot be determined whether the handling of hazardous materials created a hazard to the public or the environment; however, no accidental releases of hazardous materials into the environment were recorded or reported by the applicant during construction.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, there is no long-term operational impact under this criterion.

Impact HZ-C: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.
NO IMPACT

As identified in Table 4.8-1 (Section 4.8, "Hazards and Hazardous Materials"), two schools are located within 0.25 miles of Segment 3A. Construction of the past work along Segment 3A included limited transport and use of hazardous liquids (e.g., gasoline, solvents, and lubricating fluids). These types of hazardous materials are commonly used during construction activities associated with commercial, residential, and industrial projects. Diesel-powered vehicles and construction equipment were used during construction of the existing subtransmission line along Segment 3A. Diesel exhaust emissions are considered toxic emissions by CARB. Diesel exhaust was emitted within 0.25 miles of schools in the vicinity of the project; however, similar to the proposed construction discussed in Section 4.11, construction activities were temporary and did not take place at any single location for an extended period.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to past construction. Therefore, there are no long-term impacts under this criterion.

Impact HZ-D: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
LESS THAN SIGNIFICANT

The applicant did not perform a search of the Cortese List (Government Code Section 65962.5) database prior to construction of the existing subtransmission line along Segment 3A. However, the applicant did not report the discovery of any new sites during the construction period, which would be required by federal and state law (see Section 4.8, "Hazards and Hazardous Materials" for further discussion regarding regulatory requirements). As described in Chapter 4.8, the results of a 2012 Cortese List database search did not identify any sites within 1,000 feet of Segment 3A (DTSC 2012, 2013; SWRCB 2012, 2013a,b). Therefore, there are no significant long-term impacts under this criterion.

Impact HZ-E: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.
NO IMPACT

As discussed in Chapter 4.8, "Hazards and Hazardous Materials," Segment 3A is not located within an airport land use plan area or within 2 miles of a public airport. Therefore, there are no long-term impacts under this criterion.

Impact HZ-F: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
NO IMPACT

As discussed in Chapter 4.8, Segment 3A is not located within the vicinity of a private airstrip. Therefore, there are no long-term impacts under this criterion.

Impact HZ-G: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
LESS THAN SIGNIFICANT

Past work along Segment 3A required temporary closure of travel lanes on public roadways and involved the movement of heavy vehicles that could affect emergency vehicle access through work areas. The applicant stated that traffic control measures from the Work Area Protection and Traffic Control Manual (WATCH manual) were implemented during construction. Therefore, impacts to emergency access were temporary. Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the subtransmission line that existed prior to the past work. Therefore, long-term impacts under this criterion are less than significant.

Impact HZ-H: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A temporarily increased fire risk during refueling, vehicle and equipment use, welding, vegetation clearing, worker cigarette smoking, and other activities. Much of Segment 3A occurs near the border of state responsibility areas and local responsibilities and similarly occurs between urbanized and wildland areas (Cal FIRE 2007). However, there were no wildland fires along the Segment 3A route during construction.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Therefore, long-term impacts under this criterion are less than significant.

7.3.9 Hydrology and Water Quality

Impact HY-A: Violate water quality standards
UNDETERMINABLE

The applicant did not conduct a wetland delineation or prepare or implement a SWPPP for the construction of the existing subtransmission line along Segment 3A. Without baseline data or data

related to a grading plan or the implementation of measures to prevent erosion, flooding, or water contamination, it is unknown to what extent the past work along Segment 3A could have impacted hydrology or water quality. Short- and long-term impacts on hydrology and water quality from construction are undeterminable.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Therefore, long-term operational impacts under these criteria are less than significant.

Impact HY-B: Substantial depletion of groundwater supplies or substantial interference with groundwater recharge
LESS THAN SIGNIFICANT

An unknown amount of water was used during construction of the past work; however, the applicant did state that all water was obtained from existing entitlements (SCE 2012). Therefore, while short- and long-term impacts on water resources from construction activities are undeterminable, they are unlikely to have been significant.

Seventeen poles were topped and remained in place along Segment 3A. The diameter of the poles is 1 to 2 feet. The topped poles resulted in a total of approximately 68 square feet of impervious surfaces spread out along the Segment 3A route, which is considered less than significant. The remaining wood poles along Segment 3A that were replaced, were replaced one-for-one within an existing ROW and did not result in additional impervious surfaces. The past work did not significantly increase the amount of impervious surfaces in the area and, therefore, does not substantially interfere with groundwater recharge. Long-term impacts under this criterion are less than significant.

Impact HY-C: Substantial alteration of the existing drainage pattern of the site or area that results in substantial erosion or siltation on- or off-site
UNDETERMINABLE

See Impact HY-A.

Impact HY-D: Substantial alteration of the existing drainage pattern or rate or amount of surface runoff in a manner which would result in flooding
UNDETERMINABLE

See Impact HY-A.

Impact HY-E: Create or contribute to runoff water exceeding the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff
UNDETERMINABLE

See Impact HY-A.

Impact HY-F: Other substantial degradation of water quality
UNDETERMINABLE

See Impact HY-A.

Impact HY-G: Project structures would impede or redirect flood flows within a 100-year flood hazard area
LESS THAN SIGNIFICANT

Two LWS poles were constructed within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency. Given the circular shape of the above ground portion of their bases and their small diameter (1 to 2 feet), these structures would not impede or redirect flood flows. The long-term impact under this criterion is less than significant.

Impact HY-H: Risk of loss, injury or death involving flooding
LESS THAN SIGNIFICANT

The past construction work along Segment 3A temporarily exposed workers to the risk of loss, injury, or death involving flooding from working within the designated 100 year flood zone. However, no flooding occurred during construction, and therefore, there was no impact.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Considering that only two LWS poles are located in a 100 year flood zone, the risk of a worker being present in the area at the time of a 100 year flood event is relatively low. Therefore, long-term impacts under this criterion are less than significant.

Impact HY-I: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow
LESS THAN SIGNIFICANT

As discussed in Section 4.9, "Hydrology and Water Quality," Segment 3A is not located near any water body that could generate a seiche in the event of an earthquake and is well outside of mapped tsunami inundation areas (CDC 2009a,b). Segment 3A is located on generally flat terrain and has low landslide potential (Santa Barbara County 2010). In addition, the existing subtransmission line along Segment 3A replaced a previous subtransmission line in the same location. Therefore, risks involving seiche, tsunami, or mudflow are similar to risks associated with the previous subtransmission line that existed prior to 1999. Therefore, long-term impacts under this criterion are less than significant.

7.3.10 Land Use and Planning

Impact LU-A: Physically divide an established community
NO IMPACT

The existing subtransmission line along Segment 3A replaced a previous subtransmission line within the same ROW. Therefore, the existing subtransmission line did not physically divide an established community.

Impact LU-B: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
SIGNIFICANT

Pursuant to GO 131-D, the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities in the State of California (Subsection 4.10.2.2, "State"). However, the past work along Segment 3A is subject to the Santa Barbara County Article II Coastal Zoning Ordinance because the route is located in the California Coastal Zone. Santa Barbara County administers a Local Coastal Program, which was certified by the California Coastal Commission and, therefore, has jurisdiction over the portions of the proposed project located within Segment 3A. Construction and operation of the existing subtransmission line along Segment 3A conflicts with Santa Barbara County Article II Coastal Zoning Ordinance because applicable approvals and permits were not obtained prior to construction. Therefore, the long-term impact on the Local Coastal Program is significant.

As described in Section 7.1 of this chapter, the CPUC has prepared this chapter to provide the analysis needed for Santa Barbara County to issue a retroactive CDP for the past work along Segment 3A, as well as for the components of the proposed project within the California Coastal Zone. As described above in the introduction of this chapter, this analysis identifies significant long-term impacts of the past work along Segment 3A so that Santa Barbara County can consider modifications to the applicant's proposed project that would reduce those impacts.

7.3.11 Noise

Impact NS-A: Noise levels in excess of standards established in the local general plan or noise ordinance.
LESS THAN SIGNIFICANT

Equipment and vehicles involved in construction of the past work along Segment 3A exposed receptors located in the proximity of Segment 3A (less than 200 feet) to noise levels of 75 A-weighted decibels equivalent continuous noise level or higher, which is above the applicable Santa Barbara County standards (Environmental Thresholds and Guidelines Manual; 2008) and the City of Carpinteria (Resolution No. 408; 2006). Sensitive receptors within 200 feet of Segment 3A (see Table 4.11-2) include First Baptist Church of Carpinteria, Lion Park, and El Carro Park. These effects were temporary, transient, and attenuated (i.e., reduced in intensity) over distance; therefore, impacts during construction were less than significant.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Operation and maintenance of subtransmission lines are not considered a significant source of noise. Therefore, long-term noise impacts associated with operation of the existing subtransmission line are less than significant.

Impact NS-B: Excessive groundborne vibration or groundborne noise levels.
LESS THAN SIGNIFICANT

Heavy-duty equipment and vehicles involved in construction of the past work along Segment 3A generated vibration levels ranging between 58 and 87 vibration decibels (VdB) at 25 feet during

short-term construction activities. All receptors located at a distance of 50 feet or beyond perceived vibration levels below 80 VdB, which is generally acceptable at residential areas for activities that involve less than 30 vibration events of the same kind per day (FTA 2006). Construction-related vibrations only exceeded the human perception threshold (65 VdB) for receptors located within 50 feet from heavy-duty equipment. These effects were transient and attenuated (i.e., reduced in intensity) over distance. Sensitive receptors within 50 feet of Segment 3A (Chapter 4, Table 4.11-2), include Lion Park and El Carro Park.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to those associated with the previous subtransmission line that existed prior to the past construction. Operation and maintenance procedures of subtransmission lines do not generate excessive levels of groundborne vibration or groundborne noise. Therefore, long-term impacts associated with operation of the existing subtransmission line are less than significant.

Impact NS-C: Permanent increase in ambient noise levels in the project vicinity.
NO IMPACT

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Therefore, ambient noise levels in the vicinity of Segment 3A are not materially different than they were prior to construction of the existing subtransmission line. There is no long-term impact under this criterion.

7.3.12 Population and Housing

Impact POP-A: Induce substantial population growth in an area.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A generated an influx of approximately 24 construction workers into the area (SCE 2012). However, due to the temporary nature of the work and likelihood that personnel were largely drawn from existing populations within or near the project area, the past work did not induce substantial population growth during construction.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. No additional workers relocated to the area on a permanent basis as a result of the past work along Segment 3A. Therefore, long-term impacts under this criterion are less than significant.

Impact POP-B: Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere.
NO IMPACT

No housing units were removed for construction or operation of the existing subtransmission line along Segment 3A. The reconstruction of the existing 66-kV subtransmission was located within an existing utility ROW. Therefore, the past work along Segment 3A had no impact under this criterion.

Impact POP-C: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.
NO IMPACT

As discussed above, no housing units were removed for construction or operation of the existing subtransmission line along Segment 3A. As a result, no residents within the area were displaced, and no replacement housing was required. The reconstruction of the existing 66-kV subtransmission was located within an existing utility ROW. Therefore, there is no impact under this criterion.

7.3.13 Public Services and Utilities

Impact PS-A: Result in substantial adverse physical impacts on governmental facilities or from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following: (1) fire protection and emergency response, (2) police protection, (3) schools, (4) parks, or (5) other public facilities.

LESS THAN SIGNIFICANT

As discussed in Section 7.3.12, "Population and Housing," construction of the existing subtransmission line along Segment 3A generated an influx of approximately 24 temporary workers into the area. However, due to the temporary nature of the work and limited number of construction workers, police, fire protection, emergency response, schools, parks, and other public facilities are assumed to have operated at acceptable levels during construction.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Therefore, construction of the existing subtransmission line did not result in significant long-term impacts on police, fire protection, emergency response, schools, parks, and other public facilities.

Impact PS-B: Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
NO IMPACT

Construction of the existing subtransmission line along Segment 3A did not include the new stormwater drainage facilities or the expansion of existing facilities. Therefore, there are no long-term impacts under this criterion.

Impact PS-C: Insufficient water supplies available to serve the project from existing entitlements and resources or new or expanded entitlements required.
LESS THAN SIGNIFICANT

The source of the water and the amount of water used during construction of the existing subtransmission line was unrecorded; however, the applicant did state that all water was obtained from existing entitlements (SCE 2012).

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Further, operation and maintenance procedures associated with subtransmission lines do not require large quantities of water. Therefore, long-term impacts under this criterion are less than significant.

Impact PS-D: Served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A generated solid waste; however, the amount of solid waste generated, the disposal facilities used, and the capacity of the solid waste disposal facilities used during construction were unrecorded. Therefore, impacts on permitted capacity of solid waste disposal facilities during construction are undeterminable. However, considering that a number of components remain in place, the partial decommissioning of the previously existing 3.7-mile subtransmission line along Segment 3A is unlikely to have caused an impact under this criterion.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Further, operation and maintenance procedures associated with subtransmission lines do not generate large quantities of solid waste. Therefore, long-term impacts under this criterion are less than significant.

Impact PS-E: Noncompliance with federal, state, or local statutes and regulations related to solid waste.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A generated solid waste; however, the amount of solid waste generated, handling procedures, and legal compliance methods were unrecorded. Therefore, whether the disposal of solid waste was in compliance with federal, state, or local statutes is undeterminable. However, considering that a number of components remain in place, the partial decommissioning of the previously existing 3.7-mile subtransmission line along Segment 3A is unlikely to have caused an impact under this criterion.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Further, operation and maintenance procedures associated with subtransmission lines do not generate large quantities of solid waste. The applicant currently follows federal, state, and local statutes related to solid waste handling. Therefore, long-term impacts under this criterion are less than significant.

Impact PS-F: Exceed Santa Barbara County's solid waste thresholds of 350 tons of construction and demolition debris.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A generated solid waste; however, the amount of solid waste generated, the disposal facilities used, and the capacity of the solid waste disposal facilities used during construction were unrecorded. Therefore, short-term impacts that may have resulted due to construction activities are undeterminable.

Operations and maintenance of the existing subtransmission line along Segment 3A are similar to those associated with the previous subtransmission line that existed prior to past construction. Therefore, long-term impacts under this criterion from operation of the existing subtransmission line are less than significant.

7.3.14 Recreation

Impact RE-A: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

LESS THAN SIGNIFICANT

As discussed under Section 7.3.12, "Population and Housing," construction of the existing subtransmission line along Segment 3A could have generated an influx of 24 temporary workers into the area. The number and variety of recreational facilities within the area, some of which are shown in Figure 4.10-1, were adequate to accommodate the potential temporary and minor increase in use of local recreational areas and facilities by construction workers. Therefore, use of recreational facilities during construction did not cause substantial physical deterioration.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. While current maintenance personnel may use existing neighborhood and regional parks when working in the area, considering the intermittent nature of subtransmission line maintenance procedures, sporadic use of recreational facilities has not caused any substantial physical deterioration of recreational facilities. Therefore, long-term impacts under this criterion are less than significant.

Impact RE-B: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

NO IMPACT

The past work along Segment 3A did not include the construction or expansion of recreation facilities. Therefore, there are no impacts under this criterion.

Impact RE-C: Disrupt access to existing recreation opportunities.

LESS THAN SIGNIFICANT

As shown in Table 4.14-1, Segment 3A is within 1 mile of 10 recreational facilities. The past work along Segment 3A did not result in a significant impact related to the accessibility of the 10 recreational facilities. Segment 3A does not overlap any recreation facilities. Therefore, there are no impacts under this criterion.

7.3.15 Transportation and Traffic

Impact TT-A: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

LESS THAN SIGNIFICANT

The construction of the existing subtransmission line along Segment 3A included the movement of light, medium, and heavy-duty vehicles (including oversize vehicles such as cranes) over US-101, SR-150, SR-192, and local roads maintained by the City of Carpinteria, Santa Barbara County, and Ventura County.

Project-related vehicles and equipment generally traveled from a local temporary staging yard (e.g., SCE's Ventura Service Center) or contractor yards to work sites in the morning, returning to their points of departure in the evening. The applicant estimated that the construction activities in Segment 3A generated a maximum of approximately 72 daily vehicle trips. This figure includes the estimated 24 construction workers making two daily personal vehicle trips (one trip in the morning from home to the staging yard, and one trip in the reverse in the evening).

The temporary increase in traffic associated with the construction of the existing subtransmission line along Segment 3A accounted for a minimal and temporary increase over average daily volumes along the roadways and at the intersections shown in Tables 4.15-4 and 4.15-5.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Considering the intermittent nature of subtransmission line maintenance procedures, use of occasional maintenance vehicles in the area is not considered a significant impact under this criterion.

Impact TT-B: Conflict with an applicable congestion management program including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

LESS THAN SIGNIFICANT

Similar to Impact TT-B, the construction of the existing subtransmission line along Segment 3A generated a maximum of approximately 72 daily vehicle trips. This temporary increase in traffic associated with the past work along Segment 3A was consistent with applicable congestion management programs.

Operation and maintenance of the existing subtransmission line along Segment 3A are similar to the operations of the previous subtransmission line that existed prior to the past construction. Considering the intermittent nature of subtransmission line maintenance procedures, use of occasional maintenance vehicles in the area is not considered a significant impact under this criterion.

Impact TT-C: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
NO IMPACT

The past work along Segment 3A did not include the use of helicopters and did not result in a change to air traffic patterns. Therefore, there are no impacts under this criterion.

Impact TT-D: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A required temporary closure of travel lanes on public roadways, private roads, and driveways, and involved the movement of heavy vehicles which could have created road hazards. SCE stated that measures from the WATCH Manual were implemented during construction.

The existing subtransmission line along Segment 3A is located in the same ROW as the previous subtransmission line that existed prior to the past construction. In addition, the poles are roughly the same diameter, and activities in the area are similar to those performed prior to construction. Therefore, the design of the existing subtransmission line did not result in a design feature hazard or hazard related to an incompatible use. Long-term impacts under this criterion are less than significant.

Impact TT-E: Result in inadequate emergency access.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A required temporary closure of travel lanes on public roadways, private roads, and driveways and involved the movement of heavy vehicles that could have affected emergency vehicle access to and through work areas. SCE stated that measures from the WATCH Manual were implemented during construction.

The existing subtransmission line along Segment 3A is located in the same ROW as the previous subtransmission line that existed prior to the past construction. Therefore, the presence of the existing subtransmission line has not resulted in any changes to the environment that would have resulted in inadequate emergency access levels. Long-term impacts under this criterion are less than significant.

Impact TT-F: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
LESS THAN SIGNIFICANT

Construction of the existing subtransmission line along Segment 3A did not conflict with any current adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Construction activities in any given location occurred over a short time period and were largely conducted in areas with no public transit service or bicycle or pedestrian facilities (although public transit service and bicycle and pedestrian facilities are available in the City of Carpinteria, the route of Segment 3A does not overlap or interfere with any of these). Work in Segment 3A was conducted on SCE-owned property, within existing public utility easements, and in a public ROW. SCE obtained encroachment permits from the local jurisdictions and the California Department of

Transportation (Caltrans), as appropriate, for construction activities that encroached upon any public ROW or easement. In cases where construction work required temporary closure of travel lanes or oversize vehicle trips that could disrupt public transit, bicycle, or pedestrian traffic, SCE implemented measures contained in the WATCH Manual, including signage, flaggers, and coordination with relevant agencies, to ensure the safety of pedestrians and bicyclists.

The existing subtransmission line along Segment 3A is located in the same ROW as the previous subtransmission line that existed prior to the past construction. Therefore, the presence of the existing subtransmission line has not resulted in any changes to the environment that would have resulted in a decrease in the performance or safety of public transit, bicycle, or pedestrian facilities. Public transit, bicycle, and pedestrian activities in the area are similar to pre-2004 construction. Long-term impacts under this criterion are less than significant.

7.4 Option Analysis

7.4.1 Introduction

Due to the past unpermitted work in the project area and its relationship to the proposed project, modifications to the proposed project (referred to henceforth as "options") have been identified that could reduce the long-term significant impacts of the past work along Segment 3A. Options are similar to alternatives in that they are identified and screened using similar criteria (as described further in Appendix H); however, the term "option" has been used to differentiate them from "alternatives" as defined under CEQA. As discussed in Section 7.1, CEQA does not require the evaluation of existing impacts from past unpermitted activities. However, Section 7.3 evaluates these impacts to facilitate Santa Barbara County's review process. The EIR will also evaluate methods that would reduce these existing impacts. Though not required to mitigate impacts of the currently proposed project, these options could be implemented at the discretion of the County as part of its CDP issuance.

7.4.2 Options Development and Screening Process

The option screening analysis that was conducted to determine the range of options for consideration in the EIR is detailed in the Screening Report (Appendix H). The options reviewed included painting existing structures, replacing existing structures, reviewing engineering plans for existing structures, relocating structures, and undergrounding the subtransmission line. The Screening Report details the methodology used to evaluate and select options for further analysis, including their feasibility and the extent to which they would meet most of the basic objectives of the proposed project, as well as Santa Barbara County's objective of reducing a long-term significant impact[4] that resulted from the past work along Segment 3A. The Screening Report provides a complete description of each option, including figures and a discussion to support why each option was eliminated or retained for consideration in this EIR.

7.4.3 Long-term Significant Impacts that Resulted from the Past Work Along Segment 3A

The CPUC's analysis provided under Section 7.3, above, identifies two long-term significant impacts that resulted from the past work along Segment 3A, which are listed in Table 7-2.

[4] Long-term significant impacts based on an independent assessment using CEQA criteria.

Table 7-2 Long-term Significant Effects of Past Work Along Segment 3A

Aesthetics	• Replacement of five wood poles within the viewshed of SR 150 with four LWS poles and one TSP resulted in a significant long-term impact on the scenic resources within an eligible state scenic highway from the color and size of the new poles. • Replacement of 49 wood poles with 49 LWS poles and one TSP resulted in a significant long-term impact on the visual character of the site and its surroundings and from the color and size of the new poles.
Land Use	• Construction and operation of the existing subtransmission line along Segment 3A conflicts with Santa Barbara County Article II Coastal Zoning Ordinance because applicable approvals and permits were not obtained at the time of construction prior to 2004.

7.4.4 Options Evaluated in this Section

Project options retained for consideration in this EIR are described in this section and are shown in Appendix H. The screening process determined that these options would meet most of the CPUC project objectives, would be feasible, and would meet the County's objective of reducing a long-term significant impact that resulted from the past work along Segment 3A.

7.4.4.1 Option A – Paint Existing LWS Poles and TSP Along Segment 3A

The CPUC identified Option A. Under this option, the existing LWS poles and TSP along Segment 3A would be painted to reduce contrast with the surrounding environmental setting.

7.4.4.2 Option B – Replace Existing LWS Poles and TSP with Wood Poles Along Segment 3A

The CPUC identified Option B. Under this option, the existing LWS poles along Segment 3A would be replaced one-for-one with similar sized, new wood poles, similar to the poles that existed prior to the past work between 1999 and 2004.

7.4.4.3 Option C – Relocate the Portion of Segment 3A that Traverses Agricultural Land in the Shepard Mesa Community to Underground Conduit

The CPUC, Santa Barbara County, and the general public identified Option C. Under this option, new underground conduit would replace 0.88 miles of existing LWS poles traversing agricultural land in the Shepard Mesa community within the existing ROW (Figure 2). This option would require that approximately 13 new 55-foot-tall wood poles be constructed near the underground subtransmission line to distribute power to the surrounding Shepard Mesa community. These poles would also contain third-party lines for continued cable and telecommunications services. The applicant may need to obtain new encroachment permits, as many of their existing ROWs only provide overhead access. In addition, the distribution poles would need to be offset from the alignment of the underground subtransmission line, which could require the acquisition of new ROW. No fault return conductor would be required.

7.4.4.4 Option D – Relocate Segment 3A to Underground Conduit

The CPUC and Santa Barbara County identified Option D. Under this option, Segment 3A would be rerouted to be entirely located within Caltrans ROW along Foothill Road and Casitas Pass Road and would include the installation of new underground conduit to support the subtransmission line. No underground conduit would be installed within the Shepard Mesa community. The applicant would need to obtain encroachment permits for new ROW, as their existing easements only provide overhead access and would likely not contain sufficient space to accommodate both a distribution line and an underground subtransmission line. No fault return conductor would be required.

The existing distribution and third party lines located within Segment 3A would remain within the existing overhead ROW. The existing 49 LWS poles located along Segment 3A would be removed and replaced with 55-foot tall wood distribution poles. The existing 35 wood poles located along Segment 3A would be topped or removed and replaced with wood distribution poles as needed. In the Shepard Mesa community, 13 wood distribution poles would be constructed in the existing ROW.

7.4.5 Comparison of Options

This section presents an analysis of the advantages and disadvantages of each option in comparison to the existing conditions. This section also describes the effectiveness of each option in reducing long-term significant impacts that resulted from the past work along Segment 3A. Table 7-3 provides a summary of the determinations.

Table 7.3 Summary of the Impact Determinations for Each Option

Resource Area	**Option A:** Paint Existing LWS poles and TSP Along Segment 3A	**Option B:** Replace Existing LWS Poles with Wood Poles Along Segment 3A	**Option C:** Relocate the Portion of Segment 3A that in the Shepard Mesa Community to Underground Conduit	**Option D:** Relocate Segment 3A to Underground Conduit
Aesthetics	**Reduced**	**Reduced**	**Reduced**	**Reduced**
Agriculture and Forestry Resources	None	None	Increased	Increased
Air Quality	Increased	Increased	Increased	Increased
Biological Resources	None	None	Reduced	Reduced
Cultural Resources	None	Increased	Increased	Increased
Geology, Soils, and Mineral Resources	None	None	None	None
Greenhouse Gas Emissions	Increased	Increased	Increased	Increased
Hazards and Hazardous Materials	Increased	Increased	Increased	Increased
Hydrology and Water Quality	None	Increased	Increased	Increased
Land Use and Planning	**Reduced**	**Reduced**	**Reduced**	**Reduced**
Noise	None	Increased	Increased	Increased
Population and Housing	None	None	None	None
Public Services and Utilities	None	None	None	None
Recreation	None	None	None	None
Transportation and Traffic	None	Increased	Increased	Increased

Note: Resources in bold were found to have long-term significant impacts from the past work that occurred along Segment 3A as analyzed in Section 7.3 and summarized in Table 7-2.

7.4.5.1 Option A: Paint Existing LWS Poles and TSP Along Segment 3A

This section compares the long-term environmental impacts that resulted from the past work along Segment 3A with those of Option A. A description of Option A is provided above in Section 7.4.4.1.

Aesthetics

The eastern end of Segment 3A crosses over SR 150, which is an eligible state scenic highway (Caltrans 2012), and there are a number of sensitive receptors within the project area that have views of the subtransmission line ROW. Both construction activities and the completed structures would be noticeable to sensitive receptors. However, although additional activities, equipment, and workers would be required to paint the existing LWS structures above what is required for the proposed project, these activities would likely be indistinguishable from the proposed project activities. Further, upon project completion, the painted poles would reduce the contrast of the existing metallic subtransmission poles against the surrounding environmental setting. Therefore, during construction, while implementation of Option A would temporarily cause a small increase in short-term aesthetic impacts compared to the proposed project, Option A would lessen the significant long-term aesthetic impacts that resulted from the past work.

Periodically during operations, the poles would require repainting, which would result in an additional aesthetic impact above what was described for the proposed project. This impact would occur infrequently over the long term and would therefore be less than significant.

Agriculture and Forestry

Although painting activities would temporarily interfere with agriculture uses in the project area, including activities on Prime and Unique Farmland and land under Williamson Act contract, the severity of the impact would not be substantively different than the proposed project. For example, although pole painting would require more activity than what is currently proposed, it would not substantially lengthen the construction period or require additional ground disturbance. Implementation of Option A would therefore have a less than significant short-term impact on agriculture.

Operation and maintenance procedures would periodically require that the poles be repainted, which would result in future interruptions to agricultural production above what was described for the proposed project. This impact would occur infrequently over the long term and would be temporary. Therefore, long-term impacts on agriculture would be less than significant.

There is no forest land or timberland located along Segment 3A. Therefore, Option A would have no impact on forest land, timberland, or timberland zoned as Timberland Production.

Air Quality and Greenhouse Gases

Short-term impacts on air quality and from GHGs may result from pole painting activities during construction. Painting would require the use of construction equipment and vehicles above what is required for the proposed project. Additional vehicles and the use of paint equipment would result in increased emissions of criteria pollutants and GHG emissions; however, it is anticipated that the increased emissions that would result from the implementation of Option A would be covered by the conservative emission estimates for the proposed project. In addition, the SBCAPCD and the County of Santa Barbara do not have construction emissions thresholds. Therefore, temporary and transient air emissions resulting from the implementation of Option A during construction would be less than significant.

Operation and maintenance procedures would periodically require that the poles be repainted, which would result in future emissions above what was described for the proposed project. However, this impact would occur infrequently over the long term and would be temporary. Therefore, long-term impacts related to air quality and GHGs would be less than significant.

Biological Resources

Although a variety of species could be present along Segment 3A, this area mainly consists of disturbed agricultural land and residential and commercial activity. Because Option A would not require any ground disturbance above what is required to construct the proposed project, no additional impacts on biological species would be anticipated.

Operation and maintenance procedures would periodically require that the poles be repainted; however, painting activities would occur infrequently over the long term and would be temporary. In addition, because the poles are located predominantly on disturbed land, it is anticipated that the impact would be minimally invasive with respect to biological resources. Therefore, long-term impacts related to biological resources would be less than significant.

Cultural Resources

Option A would not require any ground disturbance above what is required to construct the proposed project; therefore, there would be no additional construction impacts on cultural resources. Operation and maintenance procedures would periodically require that the poles be repainted; however, no ground disturbance would be required, and there would be no potential to impact cultural resources. Therefore, Option A would not result in short-term or long-term cultural resources impacts.

Geology

Option A would not require any ground disturbance above what is required to construct the proposed project; therefore, there would be no additional construction impacts on geology. Operation and maintenance procedures would periodically require that the poles be repainted; however, no ground disturbance would be required, and there would be no potential to impact geology. Therefore, Option A would not result in short-term or long-term geologic impacts.

Hazards and Hazardous Materials

Short-term impacts from hazardous materials may result from the application of paint during pole painting activities. Painting activities would require the use, transport, and disposal of hazardous materials on site similar to what is required for the proposed project; however, Option A would increase the amount of hazardous materials. Compliance with federal and state regulations would minimize the potential impact from hazards by requiring the applicant to prepare and implement a Hazardous Materials Business Plan (HMBP) and other measures to prevent the release of hazardous materials. Implementation of APMs and MMs identified for the proposed project would also reduce potential short-term impacts to less than significant.

Operation and maintenance procedures would periodically require that the poles be repainted; however, painting activities would occur infrequently over the long-term and would be temporary. The impact due to the use and transport of paint and other hazardous materials would be greater than what is described for the proposed project, but it would not be significant. The applicant would follow standard best management practices and regulations regarding hazardous materials

handling, which would ensure that impacts under this criterion are reduced to an acceptable level. Therefore, long-term impacts related to hazards and hazardous materials would be less than significant.

Hydrology and Water Quality

Option A would not require any additional ground disturbance above what is required for the proposed project. Therefore, impacts related to drainage patterns, erosion, and other hydrological or water quality impacts related to ground disturbance would be no greater than what is already described for the proposed project. In addition, although pole painting could require a slightly longer construction period along Segment 3A, which could therefore necessitate the use of additional water for dust suppression, it is expected that the amount of water would be minimal, particularly considering that much of the Segment 3A ROW is located along Casitas Pass Road next to a paved roadway. Therefore, additional construction impacts related to hydrology and water for Option A would be less than significant.

Operation and maintenance procedures would periodically require that the poles be repainted; however, painting activities would occur infrequently over the long term and would be temporary. In addition, no new ground disturbance would be required. Therefore, long-term impacts related to hydrological resources would be less than significant.

Land Use and Planning

Implementation of Option A as part of the issuance of a retroactive CDP would reduce the long-term significant impact to land use that resulted from the construction of the past work within the Coastal Zone (along Segment 3A) without a CDP.

Noise

Although painting activities would require the use of additional workers and vehicles, it is not expected that these activities would raise the noise level above what is already described for the proposed project during construction. Periodically during operations, the poles would require repainting, which would result in additional noise impacts above what was described for the proposed project. However, such impacts would occur infrequently over the long term and would be less than the estimated noise levels during construction and of lesser duration. Therefore, the impact would be less than significant.

Population and Housing

Although painting activities would require the use of additional workers, the number of additional workers would be limited. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of a small number of painting crew workers would not cause a permanent increase in the local population and, as such, would not necessitate additional housing. Although the poles would require periodic repainting during operations and maintenance, painting activities would be infrequent and temporary, with crews consisting of no more than three to four people. Therefore, it is not expected that workers would relocate to the project area during operations, and Option A would not result in short-term or long-term impacts related to population and housing.

Public Services and Utilities

Although painting activities would require the use of additional workers, the number of additional workers would be limited. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of a small number of painting crew workers would not cause a permanent increase in the local population, and existing public services and utilities would be adequate to serve demand. No new public services or utilities would be required. Although the poles would require periodic repainting during operations and maintenance, painting activities would be infrequent and temporary, with crews consisting of no more than three to four people. Therefore, it is not expected that workers would relocate to the project area during operations, and Option A would not result in short-term or long-term impacts related to public services and utilities.

Recreation

Although painting activities would require the use of additional workers, the number of additional workers would be limited. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of a small number of painting crew workers would not cause a permanent increase in the local population, and the capacity of local parks would not be exceeded. No new recreational facilities or upgrades to existing recreational facilities would be required. Although the poles would require periodic repainting during operations and maintenance, painting activities would be infrequent and temporary, with crews consisting of no more than three to four people. Therefore, it is not expected that workers would relocate to the project area during operations, and Option A would not result in short-term or long-term impacts related to recreational facilities.

Traffic and Transportation

Although painting activities would require the use of additional workers and equipment, pole painting activities would not necessitate a large number of additional vehicles. The applicant's projected traffic numbers for the proposed project are sufficiently conservative to include temporary pole painting activities. Although the poles would require periodic repainting during operations and maintenance, painting activities would be infrequent and temporary, with crews consisting of no more than three to four people. Therefore, Option A would not result in an increase in baseline traffic levels in the project area. Therefore, Option A would not result in short-term or long-term impacts related to traffic or transportation.

7.4.5.2 Option B: Replace Existing LWS Poles with Wood Poles Along Segment 3A

This section compares the long-term environmental impacts that resulted from the past work along Segment 3A with those of Option B. A description of Option B is provided above in Section 7.4.4.2.

Aesthetics

Both construction activities and the completed structures would be noticeable to sensitive receptors. However, although additional activities, equipment, and workers would be required above what is required for the proposed project, these activities would be temporary. Further, upon project completion, the wooden poles would reduce the contrast of the existing metallic subtransmission poles against the surrounding environmental setting. Therefore, while implementation of Option B would temporarily cause an increase in short-term aesthetic impacts compared to the proposed project, Option B would lessen the significant long-term aesthetic impacts that resulted from the past work.

Agriculture and Forestry

Although construction activities would temporarily interfere with agriculture uses in the project area above what is described for the proposed project, including agricultural production on Prime and Unique Farmland and land under Williamson Act contract, activities would be conducted within the existing ROW. Agricultural activities would return to existing conditions post-construction because the new wood poles would result in approximately the same amount of permanent ground disturbance as the existing LWS poles. Implementation of Option A would have a less than significant short-term impact on agriculture. Operation and maintenance procedures would be the same as for the proposed project, and there would be no additional permanent disturbance. Therefore, Option A would not result in long-term impacts on agriculture.

There is no forest land or timberland located along Segment 3A. Therefore, Option B would have no impact on forest land, timberland, or timberland zoned Timberland Production.

Air Quality and Greenhouse Gas

Short-term impacts on air quality and from GHGs would result from the removal of the existing LWS poles and construction of wooden poles. Pole replacement would require the use of construction equipment and vehicles, which would result in increased criteria pollutant emissions above what is described for the proposed project. Additional emissions are assumed to be similar to the emissions that resulted from construction of the existing LWS poles during the past work in the project area (Table 7-1). The addition of this small amount of emissions to the proposed project emissions would not raise the level of emissions above a significance threshold because emissions would be temporary and transient. In addition, the SBCAPCD does not have an established significance threshold for air pollutant or GHG emissions during construction. Therefore, short-term impacts related to air quality and GHGs would remain less than significant. In addition, operation and maintenance procedures would be the same as those discussed for the proposed project. Therefore, Option B would not result in long-term impacts related to air quality or GHGs.

Biological Resources

Although a variety of species may be present along Segment 3A, the area consists mainly of disturbed agricultural land and residential and commercial activity. Although Option B would require additional ground disturbance above what is required to construct the proposed project, construction would occur within an existing ROW. The applicant would be required to follow all Mitigation Measures (MMs) required for the proposed project and would implement Applicant Proposed Measures (APMs) as described in Chapter 2 "Project Description." Therefore, short-term impacts on biological resources would remain less than significant. In addition, operation and maintenance procedures would be the same as those discussed for the proposed project. Therefore, Option B would not result in long-term biological resources impacts.

Cultural Resources

Ground disturbance during pole replacement would increase the potential to damage a previously unknown cultural or paleontological resource. However, compliance with applicable federal and state regulations and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with Option B to less than significant.

Geology

Ground disturbance during pole replacement would increase the potential for a geologic hazard to occur. However, compliance with applicable federal and state regulations, including GO 95, and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with Option B to less than significant.

Hydrology and Water Quality

Ground disturbance during pole replacement would increase the potential for impacts related to drainage patterns, erosion, and other hydrological or water quality impacts; however, the applicant would comply with applicable federal and state regulations and implement APMs and MMs identified for the proposed project. For example, the applicant would be required to implement a SWPPP, which would include erosion measures and other measures to reduce impacts on surrounding groundwater and hydrological features. In addition, although Option B would require a slightly longer construction period along Segment 3A, which would necessitate the use of additional water for dust suppression, it is expected that the amount of water would be minimal. Therefore, additional construction impacts related to hydrology and water for Option B would be less than significant. No long-term impacts on hydrology or water quality would be anticipated.

Hazardous Materials

Short-term impacts from hazardous materials may result from the pole replacements. Pole replacement activities would require the use, transport, and disposal of hazardous materials on site similar to the proposed project. For example, disposal of the existing LWS poles would be similar to what is proposed for Segments 3B and 4. In addition, the applicant would comply with federal and state regulations, which would minimize the potential impact from hazards by requiring the applicant to prepare and implement a SWPPP, HMBP, and other measures to prevent the release of hazardous materials. Implementation of APMs and MMs identified for the proposed project would also reduce the potential short-term impacts of Option B. No long-term impacts from hazards and hazardous materials would be anticipated.

Land Use and Planning

Implementation of Option B as part of the issuance of a retroactive CDP would reduce the long-term significant impact to land use that resulted from the past work within the Coastal Zone (along Segment 3A) without a CDP.

Noise

Short-term impacts related to noise and vibration would result from the implementation of Option B. Additional traffic would be generated in the project area, and the use of additional power tools and equipment during pole removal and replacement activities would temporarily cause an increase in ambient noise levels during construction above what is anticipated for the proposed project.

Impacts would be generally similar to what occurred during the past work along Segment 3A between 1999 and 2004. Heavy-duty equipment and vehicles would generate vibration levels ranging between 58 and 87 VdB at 25 feet during short-term construction activities. All receptors located at a distance of 50 feet or beyond would perceive vibration levels below 80 VdB, which is generally acceptable at residential areas for activities that involve less than 30 vibration events of the same kind per day (FTA 2006). Construction-related vibrations would exceed the human

perception threshold (65 VdB) for receptors located within 50 feet from heavy-duty equipment; however, activities at any one location would be temporary. Noise during pole replacement would be transient and short term, which would result in a less than significant impact.

Operation and maintenance procedures associated with Option B would the same as the proposed project. Therefore, there would be no long-term significant noise impacts.

Population and Housing

It is assumed that construction requirements for Option B would be similar to what was required during the past work along Segment 3A. Therefore, it is assumed that an additional 24 workers would be required above what is anticipated for the proposed project. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of 24 workers would not cause a permanent increase in the local population and would not necessitate additional housing. In addition, operation and maintenance procedures would be the same as for the proposed project. Therefore, Option B would not result in long-term impacts related to population and housing.

Public Services and Utilities

As described above, construction of Option B would require an estimated 24 workers above what is anticipated for the proposed project. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of 24 workers would not cause a permanent increase in the local population, and existing public services and utilities would be adequate to serve demand. No new public services or utilities would be required. In addition, operation and maintenance procedures would be the same as for the proposed project. Therefore, Option B would not result in long-term impacts related to public services and utilities.

Recreation

As described above, construction of Option B would require an estimated 24 workers above what is anticipated for the proposed project. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of 24 workers would not cause a permanent increase in the local population. Although workers may use local parks while working in the construction area, use would be temporary, and the capacity of local parks would not be exceeded. No new recreation facilities would be required. In addition, operation and maintenance procedures would be the same as for the proposed project. Therefore, Option B would not result in long-term impacts related to recreational facilities.

Traffic and Transportation

As described above, it is assumed that construction requirements for Option B would be similar to what was required during the past work in the project area. Therefore, it is assumed that an additional 24 workers would be required above what is anticipated for the proposed project. The applicant estimated that the past work along Segment 3A generated 72 daily vehicle trips, which is inclusive of the estimated 24 construction workers making two daily personal vehicle trips (one trip in the morning from home to the staging yard, and one trip in the reverse in the evening). As described in Section 4.15, "Traffic and Transportation," the Santa Barbara County Congestion Management Plan is not applicable to traffic associated with construction. Therefore, the temporary addition of 72 daily vehicle trips would be considered a less than significant short-term impact.

In addition, operation and maintenance procedures would be the same as for the proposed project. Therefore, Option B would not result in long-term impacts related to traffic or transportation.

7.4.5.2 Option C – Relocate the Portion of Segment 3A that Traverses Agricultural Land in the Shepard Mesa Community to Underground Conduit

This section compares the long-term environmental impacts that resulted from the past work along Segment 3A with those of Option C. A description of Option C is provided in Section 7.4.4.3.

Aesthetics

Although construction activities would be noticeable to sensitive receptors and would be in addition to what is required for the proposed project, these activities would be temporary. Further, upon project completion, undergrounding a portion of Segment 3A would reduce the visual impact in the Shepard Mesa area. A smaller distribution line would be installed adjacent to the existing ROW to distribute power to the Shepard Mesa area; however, the new wood pole distribution line would be 55 feet tall, which is considerably shorter than the existing LWS poles. Therefore, while implementation of Option C would temporarily cause an increase in short-term aesthetic impacts compared to the proposed project, Option C would lessen the significant long-term aesthetic impacts that resulted from the past work.

Air Quality and Greenhouse Gas

Short-term impacts on air quality and from GHGs would result from the undergrounding of the subtransmission line and installation of new wooden distribution poles. The additional use of construction equipment and vehicles, such as trenching equipment, would result in increased criteria pollutant emissions and GHGs. Additional emissions would be greater than the emissions that resulted from construction of the existing LWS poles during the past work in the project area (Table 7-1). For example, removal of the existing subtransmission line and construction of a new wooden distribution line that would be offset from the underground conduit would result in similar emissions to the past work in the project area. However, additional earthwork required for trenching activities would result in a further increase in air pollutants and GHG emissions. Table 7-4 depicts a conservative estimate of the total emissions that would result from implementation of Option C (see Appendix C).

Table 7-4 Option C Estimated Daily Emissions (Shepard Mesa Undergrounding)

Activity	ROG (lbs./day)	CO (lbs./day)	NO_X (lbs./day)	SO_X (lbs./day)	PM_{10} (lbs./day)	$PM_{2.5}$ (lbs./day)
Vault Installation	10.85	41.83	83.07	0.14	66.83	9.95
Duct Bank Installation	3.08	19.35	19.20	0.04	62.69	7.09
Install Underground Cable	11.53	40.00	86.61	0.15	4.24	2.88
Distribution Relocation - Cable and Civil	6.92	33.36	54.60	0.09	24.82	4.53
TOTAL Peak Daily Emissions	**32.37**	**134.55**	**243.47**	**0.42**	**158.58**	**24.46**
TOTAL Underground Construction Emissions (tons) [1]	**0.49**	**2.02**	**3.65**	**0.006**	**2.38**	**0.37**

Source: E & E 2014
Note: [1] Total Option C emissions over a 30-day installation period.

The emissions depicted in Table 7-4 would be temporary and transient, representing a small increase in emissions in Santa Barbara County as depicted in Table 7-5. The SBCAPCD does not have an established significance threshold for air pollutant emissions during construction; therefore, this increase would not be significant.

Similarly, for GHGs, the implementation of Option C would result in a temporary increase in emissions over the proposed project as depicted in Table 7-6.

Table 7-5 Total Santa Barbara County Emissions Including Option C Emissions

Emission Sources	Air Pollutant Emissions (tons per day)					
	ROG	CO	NO_x	SO_x	PM_{10}	$PM_{2.5}$
Total Emissions in Santa Barbara County from the Proposed Project [1]	37.0	164.9	91.6	36.5	27.9	13.4
Additional Option C Emissions	0.49	2.02	3.65	0.006	2.38	0.37
Total Emissions in Santa Barbara County from the Proposed Project with Option C [2]	37.49	166.92	95.25	36.51	30.28	13.77
Percent Increase	1.3%	1.2%	3.9%	0	8.5%	2.7%

Notes:
[1] Because CEQA does not require review of improperly completed past work and the information is provided for Santa Barbara County's consideration only, the Option C emissions were conservatively added to the Santa Barbara County emissions as opposed to the total project emissions.
[2] Emissions include Segment 3A emissions, such as the installation of fault return conductor, which would no longer be conducted if Option C is implemented. Therefore, total emissions estimates are considered to be conservative.

Table 7-6 Option C: Total Greenhouse Gas Emissions

Phase	$MTCO_2e$
Vault Installation	52.02
Duct Bank Installation	3.57
Install Underground Cable	54.64
Distribution Relocation - Cable and Civil	37.97
TOTAL	**148**

The addition of 148 $MTCO_2e$ to proposed project emissions would increase GHG emissions to 3,970 $MTCO_2e$ in 2015 (3.8 percent increase). Therefore, Option C would result in a less than significant short-term impact related to GHGs during construction.

Operation and maintenance of the undergrounded subtransmission line would require fewer vehicle inspections, which would reduce current emissions associated with a small number of truck trips during operations and maintenance procedures. Therefore, Option C would have no long-term impacts related to air quality or GHGs.

Agriculture

In order to place the subtransmission line in underground conduit, SCE would likely have to obtain new ROW easements. The new ROW easements may or may not be located within the existing ROW. For example, the current third-party services such as cable and telephone services, that use the existing topped wooden poles along Segment 3A would require a new distribution line to be offset from the underground line. In addition, while some agricultural activities may be permitted to continue on the surface, agricultural production would be limited above the underground conduit

and underneath the distribution line. Because the exact location of the new easements is unknown, Option C could also result in the conversion of land zoned for agriculture and possibly Important Farmland land to a non-agricultural use. Therefore, Option C would result in long-term impacts on agriculture. Although these impacts would not be considered significant in the context of County-wide agriculture, the impact in the context of the Shepard Mesa community could be considered significant because it would hinder local agricultural activity and reduce the amount of production within this small community.

Operation and maintenance would require fewer vehicle inspections to maintain the underground subtransmission line; however, in circumstances where maintenance is necessary, earthwork would be required to locate the new underground infrastructure. This could periodically result in interruptions to agricultural production over the long term; however, such activities would be infrequent and therefore less than significant.

There is no forest land or timberland located along Segment 3A. Therefore, Option C would have no impact on forest land, timberland, or timberland zoned Timberland Production.

Biological Resources

Although a variety of species may be present along Segment 3A, the area mainly consists of disturbed agricultural land and residential and commercial activity. Therefore, although Option B would require additional ground disturbance, such as trenching, the applicant would be required to follow all MMs required for the proposed project and would implement APMs as described in Chapter 2, "Project Description." For example, a number of oak trees are present in the area. Acquiring new ROW in order to offset the new wooden distribution poles could result in additional tree trimming and biological impacts above what is required for the proposed project; however, MMs and APMs would reduce the impact to less than significant. In addition, undergrounding the subtransmission line could result in a beneficial impact on avian species because risks associated with electrocution and collision with the overhead conductors would be reduced.

Operation and maintenance would require fewer vehicle inspections to maintain the underground subtransmission line; however, in circumstances where maintenance is necessary, earthwork would be required to locate the new underground infrastructure. This could result in temporary impacts to biological species periodically over the long term; however, such activities would be infrequent and therefore less than significant.

Cultural Resources

Ground disturbance during trenching and distribution pole construction would be greater than required for the proposed project, which would increase the likelihood of damaging a previously unknown cultural or paleontological resource. Compliance with applicable federal and state regulations and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with this project option to less than significant.

Operation and maintenance could require earthwork, as necessary, to locate the new underground infrastructure. This could result in further impacts on buried archaeological or paleontological resources in the future; however, the applicant would continue to follow applicable federal and state regulations, which would reduce impacts. Therefore, long-term impacts related to Option C maintenance would be less than significant.

Geology

Ground disturbance during pole replacement would increase the potential for a geologic hazard to occur. However, compliance with applicable federal and state regulations, including GO 95 and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with Option C to less than significant.

Hydrology and Water Quality

Ground disturbance during trenching would increase the potential for impacts related to drainage patterns, erosion, and other hydrological or water quality impacts; however, the applicant would comply with applicable federal and state regulations and implement APMs and MMs identified for the proposed project. For example, the applicant would be required to implement a SWPPP, which would include erosion measures and other measures to reduce impacts on surrounding groundwater and hydrological features. In addition, although Option C would require a longer construction period, which would necessitate the use of additional water for dust suppression, it is expected that the amount of water would be minimal. As a result, construction impacts related to hydrology and water for Option C would be less than significant. No long-term impacts on hydrology or water quality would be anticipated.

Hazardous Materials

Short-term impacts from hazardous materials may result from pole removal. Pole removal activities would require the use, transport, and disposal of hazardous materials on site. For example, disposal of the existing LWS poles would be similar to what is proposed for Segments 3B and 4. Hazardous materials would include fuel, oil, and other lubricants from construction equipment and vehicles. Compliance with federal and state regulations would minimize the potential impact from hazards by requiring the applicant to prepare and implement a SWPPP, HMBP, and other measures to prevent the release of hazardous materials. Implementation of APMs and MMs identified for the proposed project would also reduce potential short-term impacts. No long-term impacts from hazards and hazardous materials would be anticipated.

Land Use and Planning

Implementation of this option as part of the issuance of a retroactive CDP would reduce the long-term significant impact to land use that resulted from the construction of the past work within the Coastal Zone (along Segment 3A) without a CDP.

Noise

Short-term impacts related to noise and vibration would result from the implementation of Option C. For example, additional traffic generated in the project area and the use of additional power tools and equipment would temporarily cause an increase in ambient noise levels during construction above what is anticipated for the proposed project.

Although Option C involves trenching activities, noise impacts would nonetheless be generally similar to what occurred during the previous construction period between 1999 and 2004. Heavy-duty equipment and vehicles would generate vibration levels ranging between 58 and 87 VdB at 25 feet during short-term construction activities. All receptors located at a distance of 50 feet or beyond would perceive vibration levels below 80 VdB, which is generally acceptable at residential areas for activities that involve fewer than 30 vibration events of the same kind per day (FTA 2006). Construction-related vibrations would exceed the human perception threshold (65 VdB) for

receptors located within 50 feet of heavy-duty equipment; however, activities at any one location would be temporary. Undergrounding activities would be completed within 30 days, and noise would be transient and short term.

Operation and maintenance could require earthwork, as necessary, to locate the new underground infrastructure. This could result in further impacts related to noise in the future; however, the applicant would continue to follow noise ordinances, which would reduce impacts. In addition, operation and maintenance activities would occur with less frequency than what is expected for the proposed project. Therefore, while noise would be greater during infrequent operation and maintenance activities than what was described for the proposed project, the long-term noise impacts related to Option C would still be less than significant.

Population and Housing

While additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 30-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition workers would not cause a permanent increase in the local population and, as such, would not necessitate additional housing. In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, there would be no long-term impacts related to population and housing.

Public Services and Utilities

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 30-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of workers would not cause a permanent increase in the local population, and existing public services and utilities would be adequate to serve demand. No new public services or utilities would be required. In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, there would be no long-term impacts related to public services and utilities.

Recreation

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 30-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of 24 workers would not cause a permanent increase in the local population, and the capacity of local parks would not be exceeded. No new recreation facilities would be required. In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, there would be no long-term impacts related to recreational facilities.

Traffic and Transportation

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 30-day construction period. Even if the number of workers and vehicle trips were increased by half over what the applicant estimated for the past work in the area (36 workers and 108 daily vehicle

trips), given the short duration of activities, the increase would not be considered a significant impact.

In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, Option C would not result in long-term impacts related to traffic or transportation.

7.4.5.2 Option D – Relocate Segment 3A to Underground Conduit

This section compares the long-term environmental impacts that resulted from the past work along Segment 3A with those of Option D. A description of Option D is provided above in Section 7.4.4.4.

Aesthetics

Although construction activities would be noticeable to sensitive receptors and would be in addition to what is required for the proposed project, these activities would be temporary. Further, upon project completion, undergrounding Segment 3A would reduce the visual impact in the Shepard Mesa area and along an eligible state scenic highway. A smaller distribution line would be constructed within the Shepard Mesa area; however, the new wood pole distribution line would be 55 feet tall, which is considerably less than the existing LWS poles. Therefore, while implementation of Option D would temporarily cause an increase in short-term aesthetic impacts compared to the proposed project, Option D would lessen the significant long-term aesthetic impacts that resulted from the past work.

Air Quality and Greenhouse Gas

Short-term impacts on air quality and from GHGs would result from the undergrounding of the subtransmission line and construction of new wooden distribution poles. The additional use of construction equipment and vehicles, such as trenching equipment, would result in increased criteria pollutant emissions and GHGs. Additional emissions would be greater than the emissions that resulted from construction of the existing LWS poles during the past work in the project area (Table 7-1). For example, removal of the existing subtransmission line and construction of a new wooden distribution line in the Shepard Mesa community would result in similar emissions to the past work in the project area. However, additional earthwork required for trenching activities along the length of Foothill Road and Casitas Pass Road would result in a further increase in air pollutants and GHG emissions. Table 7-7 depicts an estimate of the total emissions that would result from implementation of Option D (see Appendix C).

Table 7-7 Option D Estimated Daily Emissions (Segment 3A Undergrounding)

Activity	ROG (lbs./day)	CO (lbs./day)	NO_X (lbs./day)	SO_X (lbs./day)	PM_{10} (lbs./day)	$PM_{2.5}$ (lbs./day)
Vault Installation	10.85	41.83	83.07	0.14	66.83	9.95
Duct Bank Installation	3.08	19.35	19.20	0.04	62.69	7.09
Install Underground Cable	11.53	40.00	86.61	0.15	4.24	2.88
Distribution Relocation - Cable and Civil	6.92	33.36	54.60	0.09	24.82	4.53
TOTAL Peak Daily Emissions	**32.37**	**134.55**	**243.47**	**0.42**	**158.58**	**24.46**
TOTAL Underground Construction Emissions (tons) [1]	**1.47**	**6.12**	**11.08**	**0.02**	**7.22**	**1.11**

Source: E & E 2014

Note: [1] Total Option D emissions over a 91-day installation period.

The emissions depicted in Table 7-6 would be temporary and transient, representing a small to moderate increase in emissions in Santa Barbara County relative to the proposed project (Table 7-8), particularly for PM_{10} emissions. Regardless, the SBCAPCD does not have an established significance threshold for air pollutant emissions during construction; therefore, this increase would not be significant.

Table 7-8 Total Santa Barbara County Emissions Including Option D Emissions

Emission Sources	Air Pollutant Emissions (tons per day)					
	ROG	CO	NO_x	SO_x	PM_{10}	$PM_{2.5}$
Total Emissions in Santa Barbara County from the Proposed Project[1]	37.0	164.9	91.6	36.5	27.9	13.4
Additional Option D Emissions	1.47	6.12	11.08	0.02	7.22	1.11
Total Emissions in Santa Barbara County from the Proposed Project With Option D [2]	38.47	176.02	102.68	36.52	35.12	14.51
Percent Increase	3.9%	3.7%	12.0%	0	25.8%	8.2%

Notes:
[1] Because CEQA does not require review of improperly completed past work and the information is provided for Santa Barbara County's consideration only, the Option D emissions were conservatively added to the Santa Barbara County emissions as opposed to the total project emissions.
[2] Emissions include Segment 3A emissions, such as the installation of fault return conductor, which would no longer be conducted if Option D is implemented. Therefore, total emissions estimates are considered to be conservative.

Similarly, for GHGs, the implementation of Option D would result in a temporary increase in emissions over the proposed project as depicted in Table 7-9.

Table 7-9 Option D: Total Greenhouse Gas Emissions

Phase	$MTCO_2e$
Vault Installation	182.08
Duct Bank Installation	76.27
Install Underground Cable	54.64
Distribution Relocation - Cable and Civil	37.97
TOTAL	**351**

The addition of 351 $MTCO_2e$ to proposed project emissions would increase GHG emissions to 4,173 MT CO_2e in 2015 (9.2 percent increase). Although a 9.2 percent increase could be considered a moderate increase over the proposed project emissions, the increase would not exceed any GHG emissions thresholds. Therefore, Option D would result in a less than significant short-term impact related to GHGs during construction.

Operation and maintenance of the undergrounded subtransmission line would require fewer vehicle inspections, which would reduce current emissions associated with a small number of truck trips during operation and maintenance procedures. Therefore, Option D would have no long-term impacts related to air quality or GHGs.

Agriculture

In order to place the subtransmission line in underground conduit, SCE would have to obtain new ROW easements. The new easements would likely not be located within the existing ROW. For

example, the current third-party services, such as cable and telephone services, that use the existing topped wooden poles along Segment 3A generally follow the same path as the subtransmission line. The new underground conduit would be offset from the distribution line along the roadway, which could include new ROW acquisitions consisting of Unique Farmland, Prime Farmland, Farmland of Statewide Importance, and land under Williamson Act contract. While some agricultural activities may be permitted to continue on the surface, agricultural production would be limited above the underground conduit and underneath the distribution line. Because the exact location of the new easements is unknown, Option D could also result in the conversion of land zoned for agriculture and possibly Important Farmland land, to a non-agricultural use. Therefore, Option D would likely result in long-term impacts on agriculture above what are described for the proposed project.

The distribution line that would be constructed in the Shepard Mesa community within the existing ROW would have temporary impacts during construction, but during operations and maintenance, agricultural production would return to baseline levels.

Operation and maintenance would require less vehicle inspection to maintain the underground subtransmission line; however, in circumstances where maintenance is necessary, earthwork would be required to locate the new underground infrastructure. This could periodically result in interruptions to agricultural production over the long term; however, such activities would be infrequent and therefore less than significant.

There is no forest land or timberland located along Segment 3A. Therefore, Option C would have no impact on forest land, timberland, or timberland zoned Timberland Production.

Biological Resources

Although a variety of species may be present along Segment 3A, the new underground subtransmission line would be located along an existing roadway. Therefore, although Option D would require additional ground disturbance, such as trenching, the applicant would be required to follow all MMs required for the proposed project and would implement APMs as described in Chapter 2, "Project Description." For example, a number of oak trees are present in the area. Acquiring new ROW in order to offset the new underground subtransmission line could result in additional tree trimming and biological impacts above what is required for the proposed project; however, MMs and APMs would reduce the impact to less than significant. In addition, undergrounding the subtransmission line could result in a beneficial impact on avian species because risks associated with electrocution and collision with the overhead conductors would be reduced.

Operation and maintenance would require fewer vehicle inspections to maintain the underground subtransmission line; however, in circumstances where maintenance is necessary, earthwork would be required to locate the new underground infrastructure. This could result in temporary impacts to biological species periodically over the long term; however, such activities would be infrequent and therefore less than significant.

Cultural Resources

Ground disturbance during trenching and distribution pole construction would be greater than required for the proposed project, which would increase the likelihood of damaging a previously unknown cultural or paleontological resource. Compliance with applicable federal and state regulations and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with this project option to less than significant.

Operation and maintenance could require earthwork, as necessary, to locate the new underground infrastructure. This could result in further impacts on buried archaeological or paleontological resources in the future; however, the applicant would continue to follow applicable federal and state regulations, which would reduce impacts. Therefore, long-term impacts related to Option D maintenance would be less than significant.

Geology

Ground disturbance during pole replacement would increase the potential for a geologic hazard to occur. However, compliance with applicable federal and state regulations, including GO 95 and implementation of APMs and MMs identified for the proposed project would reduce the potential impacts associated with Option D to less than significant.

Hydrology and Water Quality

Ground disturbance during trenching would increase the potential for impacts related to drainage patterns, erosion, and other hydrological or water quality impacts; however, the applicant would comply with applicable federal and state regulations and implement APMs and MMs identified for the proposed project. For example, the applicant would be required to implement a SWPPP, which would include erosion measures and other measures to reduce impacts on surrounding groundwater and hydrological features. In addition, although Option D would require a longer construction period, which would necessitate the use of additional water for dust suppression, it is expected that the amount of water would be minimal. As a result, construction impacts related to hydrology and water for Option D would be less than significant. No long-term impacts on hydrology or water quality would be anticipated.

Hazardous Materials

Short-term impacts from hazardous materials may result from pole removal. Pole removal activities would require the use, transport, and disposal of hazardous materials on site. For example, disposal of the existing LWS poles would be similar to what is proposed for Segments 3B and 4. Hazardous materials would include fuel, oil, and other lubricants from construction equipment and vehicles. Compliance with federal and state regulations would minimize the potential impact from hazards by requiring the applicant to prepare and implement a SWPPP, HMBP, and other measures to prevent the release of hazardous materials. Implementation of APM and MM identified for the proposed project would also reduce potential short-term impacts.

Option D would require more work along the Caltrans roadway, which would increase health and safety risks for workers due to vehicle collisions. The applicant would be required to implement the APMs and MMs described for the proposed project, which include preparation of a traffic management plan. Implementation of these measures would reduce this short-term impacts to less than significant.

No long-term impacts from hazards and hazardous materials would be anticipated.

Land Use and Planning

Implementation of this option as part of the issuance of a retroactive CDP would reduce the long-term significant impact to land use that resulted from the construction of the past work within the Coastal Zone (along Segment 3A) without a CDP.

Noise

Short-term impacts related to noise and vibration would result from the implementation of Option D. For example, additional traffic generated in the project area and the use of additional power tools and equipment would temporarily cause an increase in ambient noise levels during construction above what is anticipated for the proposed project.

Although Option D involves trenching activities, noise impacts would nonetheless be generally similar to what occurred during the previous construction period between 1999 and 2004, although spread out over a larger area. Heavy-duty equipment and vehicles would generate vibration levels ranging between 58 and 87 VdB at 25 feet during short-term construction activities. All receptors located at a distance of 50 feet or beyond would perceive vibration levels below 80 VdB, which is generally acceptable at residential areas for activities that involve less than 30 vibration events of the same kind per day (FTA 2006). Construction-related vibrations would exceed the human perception threshold (65 VdB) for receptors located within 50 feet from heavy-duty equipment; however, activities at any one location would be temporary. Undergrounding activities would be completed within 91 days, and noise would be transient and short-term.

Operation and maintenance could require earthwork to locate the new underground infrastructure. This could result in further impacts related to noise in the future; however, the applicant would adhere to noise ordinance requirements, which would reduce impacts. In addition, operation and maintenance activities would occur with less frequency than what is expected for the proposed project. Therefore, while noise would be greater during infrequent operation and maintenance activities than what was described for the proposed project, the long-term noise impacts related to Option D would nonetheless be less than significant.

Population and Housing

While additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 91-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary additional workers would not cause a permanent increase in the local population and, as such, would not necessitate additional housing. In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, there would be no long-term impacts related to population and housing.

Public Services and Utilities

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 91-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of workers would not cause a permanent increase in the local population, and existing public services and utilities would be adequate to serve demand. No new public services or utilities would be required. In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, there would be no long-term impacts related to public services and utilities.

Recreation

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 91-day construction period. As described for the proposed project, the majority of workers would be pulled from the existing labor pool within Santa Barbara and Ventura counties. Therefore, the temporary addition of workers would not cause a permanent increase in the local population, and the capacity of local parks would not be exceeded. No new recreation facilities would be required. In addition, operation and maintenance procedures would less frequent than for the proposed project. Therefore, there would be no long-term impacts related to recreational facilities.

Traffic and Transportation

As described above, while additional workers would be required to conduct trenching activities and place the line in new underground conduit, the increase would be temporary over an estimated 91-day construction period. Even if the number of workers and vehicle trips were increased by half over what the applicant estimated for the past work in the area (36 workers and 108 daily vehicle trips), given the short duration of activities, the increase would not be considered a significant impact. However, additional road closures would be required to conduct trenching activities along Casitas Pass Road and Foothill Road. Road closures would be temporary, and the applicant would comply with APMs and MMs, including the implementation of a traffic control plan during construction. Therefore, short-term traffic impacts during construction would be less than significant.

In addition, operation and maintenance procedures would be less frequent than for the proposed project. Therefore, Option D would not result in long-term impacts related to traffic or transportation.

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