

5.0 Comparison of Alternatives

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

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

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

An Environmentally Superior Alternative is identified in Section 5.3.

5.1 Comparison Methodology

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

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

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

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

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

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

21 **5.2 Analysis of Alternatives**

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

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

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

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

Table 5-1 Summary of the Alternatives Analyses and Determinations

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

Table 5-1 Summary of the Alternatives Analyses and Determinations

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

Note:

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

1 **5.2.1.1 Environmental Impacts and Mitigation Aesthetics**

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

10
11 **Agriculture and Forestry Resources**

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

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

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

31
32 **Air Quality and Greenhouse Gases**

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

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

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

1 Alternative A would be a smaller percentage of each county’s planning emission inventory than the
2 proposed project. However, the majority of the proposed project’s ROG and NOx emissions are
3 related to pole and tower replacement activities along Segments 3B and 4 and access road
4 improvements. These activities would occur regardless of whether Alternative A was implemented.
5 Therefore, considering that the reduced scope elements are a small portion of the overall scope of
6 the project, the emissions reductions would not be substantial.
7

8 As described in Section 4.7.2.3 for the proposed project, all applicable jurisdictions for Alternative A
9 have not officially adopted Climate Action Plans, policies, or regulations for the purpose of reducing
10 GHG emissions from non-stationary sources. Direct GHG contributions for the proposed project and
11 Alternative A are associated with the temporary use of mobile sources and heavy duty diesel-fired
12 equipment. Since Alternative A would require less equipment and shorter use of equipment, direct
13 GHG contributions from Alternative A would be less than the proposed project. No new permanent
14 GHG-emitting equipment would be installed as part of the proposed project or Alternative A.
15

16 Operational emissions from Alternative A would have a similar impact on air quality and GHG
17 emissions as the proposed project, considering that operation activities would be the same under
18 each alternative.
19

20 **Biological Resources**

21 Alternative A would include construction activity within the same area as the proposed project.
22 Therefore, Alternative A would expose potential risk to the same range of special status species and
23 other sensitive biological resources. However, Alternative A would reduce the total amount of
24 temporary ground disturbance (8.07 acres less) required along Segments 1, 2, and 3A compared to
25 the proposed project. Direct impacts on special status plant species or sensitive habitat located
26 adjacent to the existing foundations and topped poles would be reduced during construction.
27 However, under Alternative A, existing infrastructure, such as tower foundations, would not be
28 removed. Therefore, those areas would not be rehabilitated post-construction. Mitigation measures
29 applicable to the proposed project would be applicable to Alternative A. Impacts on biological
30 resources during construction under Alternative A would be less than significant with mitigation.
31

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

35 **Cultural Resources**

36 Alternative A would include construction activity within the same area as the proposed project and
37 would not impact any known cultural resources identified in Section 4.5, “Cultural Resources.”
38 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)
39 required along Segments 1, 2, and 3A compared to the proposed project, which would reduce the
40 potential to disturb a previously undiscovered cultural resource. Mitigation measures applicable to
41 the proposed project would be applicable to Alternative A. Impacts on cultural resources during
42 construction under Alternative A would be less than significant with mitigation.
43

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

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

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

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

16
17 **Hazards and Hazardous Materials**

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

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

30
31 **Hydrology and Water Quality**

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

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

43
44 **Land Use and Planning**

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

48

1 **Noise**

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

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

14
15 **Population and Housing**

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

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

26
27 **Public Services and Utilities**

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

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

37
38 **Recreation**

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

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

47

1 **Traffic and Transportation**

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

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

21
22 **Cumulative Impacts**

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

27
28 **Growth Inducing Impacts**

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

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

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

43
44 This section compares the environmental impacts of the proposed project with those of
45 Alternative B, under which, structures at construction sites 116 through 125 (along Segment 4)
46 would be installed via helicopter. The proposed project would include approximately 120 miles of
47 access road, 5 miles of which require extensive road rehabilitation. The temporary and permanent
48 disturbance acreages for the proposed project would be 201.10 and 110.42, respectively (Table 2-8).

1 Alternative B would include approximately 117 miles of access road, 4.5 miles of which require
2 extensive road rehabilitation. Temporary and permanent ground disturbance associated with the
3 road widening/rehabilitation would be approximately 1.8 and 2.0 acres, respectively. Therefore,
4 temporary and permanent disturbance acreages for Alternative B would be 199.3 and 108.42,
5 respectively. It should be noted that the calculations in this analysis assume that the use of
6 helicopters for construction at sites 116 through 125 would substantially reduce the need for access
7 road improvements on roads leading to these site areas. However, some access road improvements
8 may still be necessary to meet standards for ongoing maintenance during operations and emergency
9 access. A description of the alternative is provided in Chapter 3, "Description of Alternatives." As
10 discussed in Appendix H, this alternative is potentially feasible and would meet the basic objectives
11 of the proposed project.

13 5.2.2.1 Environmental Impacts and Mitigation

14 Aesthetics

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

23 Agriculture

24 The portion of Segment 4 that would be accessed via helicopter, as described under Alternative B, is
25 not located on designated Important Farmland, land zoned for agricultural use, land under a
26 Williamson Act contract, or designated timberland. However, it should be noted that additional
27 landing zones would likely be required in order to perform helicopter construction at these sites.
28 The availability of large, flat areas in the Segment 4 area is limited, and, in many cases, areas that
29 would meet the necessary criteria are currently being used for agricultural purposes. Therefore,
30 this alternative could result in additional temporary impacts to agricultural resources if landing
31 sites must be located in existing agricultural areas. Tree trimming for the proposed project would
32 not convert forest land area to a non forest use; therefore, Alternative B, which would result in less
33 ground disturbance than the proposed project, would have less of an impact on forest land.
34 Mitigation applicable to the proposed project would be applicable to Alternative B. Impacts on
35 agriculture and forestry resources during construction under Alternative B would be less than
36 significant with mitigation.

38 Air Quality and Greenhouse Gases

39 Air pollutant and GHG emissions would be generated during the various activities associated with
40 construction of Alternative B from sources similar to the proposed project. Construction methods
41 under Alternative B would vary from the proposed project along Segment 4 within SBCAPCD due to
42 the increased use of helicopters. The increased use of helicopters would reduce the amount of road
43 repair and ground disturbance required along Segment 4 and would result in less PM₁₀ and PM_{2.5}
44 (fugitive dust) emissions. However, the increased use of helicopters associated with the installation
45 of structures along Segment 4 would increase NO_x and ROG air pollutants and GHG emissions
46 within SBCAPCD.

1 SBCAPCD has prepared an air quality plan that establishes air quality emissions inventories and
2 controls for ozone NO_x and ROG sources in the proposed project area. ROG and NO_x emissions from
3 the proposed project and Alternative B would be primarily from on-site construction equipment,
4 including helicopter operations. As shown in Table 4.3-10, the proposed project's construction
5 emissions in year 2015 would represent approximately 1.9 percent of the regional emissions
6 inventories for NO_x and 0.16 percent for ROG. In 2016, construction emissions would represent less
7 than 0.1 percent for NO_x and ROG of each county's emissions inventory. Alternative B would
8 increase NO_x emissions by approximately 0.11 tons/day and ROG emissions by approximately 0.02
9 tons/day¹. Alternative B's construction emissions in year 2015 would represent approximately
10 2.34 percent of the regional emissions inventories for NO_x and 0.22 percent for ROG.
11 Therefore, while impacts associated with some pollutants would be lessened due to less ground
12 disturbance (PM₁₀ and PM_{2.5}), impacts associated with other pollutants would be increased (NO_x
13 and ROG), which would result in a similar impact on air quality compared to the proposed project.
14 In addition, construction sites 116 through 125 are located in a relatively remote area, so emissions
15 associated with fugitive dust are not likely to impact sensitive receptors. In contrast, NO_x and ROG
16 emissions are considered a more regional impact. Therefore, Alternative B's increased NO_x and
17 ROG emissions could be considered more impactful than the proposed project's fugitive dust
18 impacts.

19
20 As described in Section 4.7.2.3 for the proposed project, all applicable jurisdictions for Alternative B
21 have not officially adopted Climate Action Plans, policies, or regulations for the purpose of reducing
22 GHG emissions from non-stationary sources. Direct GHG contributions for the proposed project and
23 Alternative A are associated with the temporary use of mobile sources and heavy duty diesel-fired
24 equipment. Alternative A would generate approximately 180 MTCO_{2e} (GHG) emissions² more than
25 the proposed project during construction from the increased helicopter use. No new permanent
26 GHG-emitting equipment would be installed as part of the proposed project or Alternative A.

27
28 Operation of Alternative B would result in greater air pollutant and GHG emissions than described
29 for the proposed project, as helicopters would be used to access construction sites 116 through
30 125. However, the emissions would be infrequent and would not result in a significant impact.

31 32 **Biological Resources**

33 The use of helicopter construction, as described for Alternative B, would avoid the need for road
34 rehabilitation to access construction sites 116 through 125. The access roads for these construction
35 sites under the proposed project would cross drainages that have the potential to contain special
36 status species and are National Marine Fisheries Service (NMFS)-designated critical habitat for
37 steelhead trout or drainages that flow into NMFS-designated critical habitat (sites 5-11, Figure 4.4-
38 1). Alternative B would avoid temporary direct impacts on steelhead critical habitat that would
39 result from riparian vegetation clearing and road widening at Sutton Creek. Alternative B would
40 avoid the potential for indirect impacts from hazardous materials, increased sediment loads,
41 barriers to steelhead migration, or loss or degradation of rearing habitat on downstream steelhead
42 and/or critical habitat. However, because the roads would not be rehabilitated and would continue

¹ ROG and NO_x emissions that would result from the additional helicopter use were estimated by multiplying the ROG and NO_x helicopter emissions (lbs. per day) calculated for LST removal, J-Tower footing installation, and J-Tower assembly and erections at site 132 in Appendix C by 10 (construction sites 116 through 125). The sum was then converted into tons per day.

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

1 to be used for maintenance procedures during operation, some long-term biological impacts would
2 be greater for Alternative B than the proposed project. In particular, Alternative B would avoid
3 short-term impacts on one acre of NMFS-designated critical habitat during construction but, unlike
4 the proposed project, would not improve conditions during operation.
5

6 The drainages located in between construction sites 116 and 125 have the potential to contain
7 arroyo chub and provide suitable habitat for the California red legged frog and coast range newt. As
8 described in Section 4.4, "Biological Resources," road rehabilitation activities associated with the
9 proposed project along Segment 4 has the potential to result in direct and indirect impacts on these
10 species. The risk to these species would be reduced under Alternative B.
11

12 The increased presence of the helicopters at low elevations would temporary increase impacts on
13 bird species. However, MMs identified for the proposed project would reduce the potential impacts
14 on birds to less than significant.
15

16 Construction of the remaining components of Alternative B would have similar impacts on
17 biological resources compared to the proposed project as construction activities would occur
18 within the same area. Mitigation applicable to the proposed project would be applicable to
19 Alternative B. Impacts on biological resources during construction under Alternative B would be
20 less than significant with mitigation.
21

22 Operation of Alternative B would have less of a permanent impact on NMFS-designated critical
23 habitat compared to the proposed project; however, the proposed project has the potential to
24 improve baseline conditions with respect to Sutton Canyon. The rehabilitation of the access roads,
25 as described for the proposed project, would also benefit the geologic stability of the area and
26 would prevent future landslides and soil erosion events, which would prevent adjacent aquatic
27 habitat from being contaminated by sediments. Alternative B would also require increased
28 helicopter use during maintenance and inspection activities, which would result in increased short-
29 term permanent impacts to birds. Mitigation applicable to the proposed project would be applicable
30 to Alternative B. Impacts on biological resources from Alternative B would be less than significant
31 with mitigation.
32

33 **Cultural Resources**

34 Alternative B would include construction activity within the same area as the proposed project and
35 would not impact any known cultural resources identified in Section 4.5, "Cultural Resources."
36 Alternative B would reduce the total amount of temporary and permanent ground disturbance (3.8
37 acres less) required along Segment 4 compared to the proposed project, which would reduce the
38 potential to disturb a previously undiscovered cultural resource. Mitigation measures applicable to
39 the proposed project would be applicable to Alternative B. Impacts on cultural resources during
40 construction under Alternative A would be less than significant with mitigation.
41

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

45 **Geology, Soils, and Mineral**

46 Existing geologic conditions between construction sites 116 and 125 include several areas that are
47 prone to landslides and soil erosion. The reduced ground disturbance along Segment 4 associated
48 with Alternative B would reduce the potential for construction of the project to cause or increase
49 geologic impacts in this area. Construction of the remaining components of Alternative B would

1 have similar impacts on geology, soils, and minerals compared to the proposed project as
2 construction and operation activities would occur within the same area. Mitigation applicable to the
3 proposed project would be applicable to Alternative B. Impacts on geology, soils, and mineral
4 resources during construction under Alternative B would be less than significant with mitigation.
5

6 Operation of Alternative B would not have a permanent impact on geology and soils between
7 construction sites 116 and 125 as no ground disturbance would occur within the area. However,
8 the rehabilitation of the access roads, as described for the proposed project, would benefit the
9 geologic stability of the area and would prevent future landslides and soil erosion.

10 11 **Hazards and Hazardous Materials**

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

21 Operation of Alternative B would have a similar impact from hazards and hazardous materials as
22 the proposed project, considering that operation activities would be the same under each
23 alternative.
24

25 **Hydrology and Water Quality**

26 Alternative B would reduce the total amount of temporary and permanent ground disturbance (3.8
27 acres less) required along Segment 4 compared to the proposed project, which includes avoiding
28 six stream crossings (Figure 4.4-1). Therefore, Alternative B would have less of an impact on
29 increased soil erosion rates, sedimentation of adjacent water bodies, water quality standard
30 violations, and beneficial uses along these segments during construction. Construction of the
31 remaining components of Alternative B would have similar impacts on hydrology and water quality
32 compared to the proposed project as construction activities would occur within the same area.
33 Impacts on hydrology and water quality during construction under Alternative B would be less than
34 significant.
35

36 Operation of Alternative B would not reduce a permanent impact on hydrology and water quality
37 compared to the proposed project as no ground disturbance would occur in between construction
38 sites 116 through 125. Alternative B would avoid the use of six stream crossing, which can
39 potentially contaminate hydrology with sediments, fuels, or oils. However, the rehabilitation of the
40 access roads, as described for the proposed project, would benefit the geologic stability of the area
41 and would prevent future landslides and soil erosion events, which would prevent adjacent
42 hydrologic features from being contaminated by sediments. Mitigation applicable to the proposed
43 project would be applicable to Alternative B. Impacts on hydrology and water quality during
44 operation Alternative B would be less than significant with mitigation.
45

1 **Land Use**

2 Alternative B would occur within the same areas as the proposed project. Therefore, construction
3 and operation impacts on land use and planning under Alternative B would be the same as
4 described for the proposed project and would be less than significant.
5

6 **Noise**

7 Alternative B would include an increase use of helicopters along Segment 4. The only sensitive
8 receptor within one mile of the structures that would be constructed via helicopter is the Los
9 Padres National Forest (approximately 0.5 mile). As further detailed in Section 4.11, "Noise," USFS
10 directive FSH 1909.12 (Land Management Planning Handbook) identifies noise as key criteria for
11 the definition of wilderness areas; however, no specific standards applicable to USFS land uses are
12 provided within this regulation. Construction sites 116 through 125 are not located on USFS land.
13 Alternative B would not increase helicopter operations over USFS land during construction
14 compared to the proposed project and would not create a significant impact. Construction of the
15 remaining components of Alternative B would have similar impacts from noise as the proposed
16 project since construction activities would occur within the same area and the same construction
17 equipment would be used. Mitigation applicable to the proposed project would be applicable to
18 Alternative B. Impacts from noise during construction of Alternative B would be less than
19 significant with mitigation.
20

21 Operation of Alternative B would have a greater impact from noise as the proposed project as
22 helicopters would need to be used to access construction sites 116 through 125 for regular
23 maintenance and inspection activities. However, impacts from noise would be less than significant
24 with mitigation during operation for the same reasons that are discussed above for construction
25 activities.
26

27 **Population and Housing**

28 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would
29 require a similar number of workers as the proposed project. Alternative B and the proposed
30 project would largely draw construction workers from the existing population within or near the
31 project area. Therefore, Alternative B would have a similar impact on population growth during
32 construction as the proposed project. Alternative B and the proposed project would have similar
33 impacts on displacement of housing and people as the proposed would occur within the same area.
34

35 Operation of Alternative A would have a similar impact on population and housing as the proposed
36 project, considering that operation activities would be the same under each alternative.
37

38 **Public Services and Utilities**

39 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would
40 require a similar number of workers as the proposed project. Alternative B and the proposed
41 project would largely draw construction workers from the existing population within or near the
42 project area. Therefore, Alternative B would have a similar impact on population growth during
43 construction as the proposed project.
44

45 Alternative B would require less water for dust suppression and road compaction during
46 construction. Therefore, Alternative B would have a reduced impact on public services and utilities
47 compared to the proposed project.
48

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

3
4 **Recreation**

5 The peak workforce for the proposed project on any given day is 105 workers. Alternative B would
6 require a similar number of workers as the proposed project. Alternative B and the proposed
7 project would largely draw the construction worker from the existing population within or near the
8 project area. Therefore, Alternative B would have a similar impact on population growth during
9 construction as the proposed project. Therefore, Alternative B would have a similar impact on
10 recreation facilities during construction as the proposed project.

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

14
15 **Traffic**

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

32
33 Operation of Alternative B would have a greater impact on air traffic compared to the proposed
34 project as helicopters would need to be permanently used to access construction sites 116 through
35 125 for regular maintenance and inspection activities. However, impacts on air traffic would be less
36 than significant with mitigation during operation for the same reasons that are discussed for
37 construction activities. Alternative B would not impact emergency access between construction
38 sites 116 and 125; however, the proposed project would improve permanent emergency access to
39 the area as a result of the road rehabilitation.

40
41 **Cumulative Impacts**

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

1 **Growth Inducing**

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

7
8 Operation of Alternative B would not directly or indirectly contribute to population growth.
9 Alternative B would not require additional long-term staffing. Alternative B would not induce
10 additional electrical consumption. Rather, Alternative B, similar to the proposed project, would
11 meet emergency electrical demands of the Santa Barbara South Coast area, while enhancing
12 operational flexibility.

13
14 **5.2.3 No Project Alternative**

15
16 This section compares the environmental impacts of the proposed project with those of the No
17 Project Alternative. The No Project Alternative involves the circumstances under which the
18 proposed project does not proceed. Pursuant to CEQA Guidelines Section 15126.6(e), the following
19 qualitative analysis takes into consideration events and actions that would be reasonably expected
20 to occur in the foreseeable future if the proposed project were not approved.

21
22 **5.2.3.1 Environmental Impacts and Mitigation**

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

35
36 **5.3 Environmentally Superior Alternative**

37 The No Project Alternative would be environmentally superior for all environmental resources.
38 However, when the Environmentally Superior Alternative is the No Project Alternative, CEQA
39 requires the identification of an Environmentally Superior Alternative among the other alternatives
40 (CEQA Guidelines Section 15126.6).

41
42 Determinations are provided that indicate whether the proposed project or an alternative would be
43 environmentally superior for each resource area. Where the analysis determines that impacts
44 would be similar to the proposed project, the proposed project is selected as environmentally
45 superior for that resource area by default. Table 5-1 provides a summary of the determinations.

1 **Aesthetics**

2 Alternatives A and B would have similar impacts on aesthetics as the proposed project. Although
3 Alternative A, would maintain topped poles along SR 192, the presence of these poles are
4 considered part of the environmental baseline and would not result in an impact. Alternative B,
5 would avoid access roads from being reestablished along Segment 4; however, these roads would
6 not be visible from public view and would not result in a greater impact. Therefore, the proposed
7 project would be the environmentally superior alternative for the permanent impacts on aesthetics.
8

9 **Agriculture and Forestry Resources**

10 Alternatives A and B would have similar impacts on agriculture and forestry resources as the
11 proposed project. Although Alternative A would maintain topped poles within Important Farmland,
12 the presence of these poles are considered part of the environmental baseline and would not result
13 in an impact. Alternative B would eliminate access road upgrades along Segment 4; however, site
14 preparation activities would still be required at specific tower locations. While access roads are
15 existing and tree removal would likely not be required for road construction for the proposed
16 project, tree removal may still be required for site preparation activities. Therefore, impacts on
17 agriculture and forestry resources would be similar for all alternatives, and the proposed project
18 would be the environmentally superior alternative for permanent impacts on agriculture and
19 forestry resources.
20

21 **Air Quality and GHG**

22 Alternative A would decrease the use of construction equipment and ground disturbance compared
23 to the proposed project, which would reduce the total air pollutant and GHG emissions; however,
24 the reduction would not be substantial. Alternative B would reduce road construction and increase
25 helicopter use compared to the proposed project during construction and operation, which would
26 result in a reduction in PM₁₀ and PM_{2.5} but an increase in NO_x, ROG, and GHG emissions. Therefore,
27 Alternative A would be the environmentally superior alternative for temporary impacts on air
28 quality and GHG.
29

30 **Biological Resources**

31 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)
32 required along Segments 1, 2, and 3A compared to the proposed project. Alternative B would
33 reduce the total amount of temporary and permanent ground disturbance required along
34 Segment 4 (3.8 acres less) compared to the proposed project. Alternative B would avoid direct
35 impacts on NMFS-designated critical habitat during construction; however, unlike the proposed
36 project, Alternative B would not improve conditions during operations. Alternative A would have
37 less potential impacts on birds resulting from increased helicopter use compared to Alternative B.
38 Therefore, Alternative A would be the environmentally superior alternative for the permanent
39 impacts on biological resources.
40

41 **Cultural Resources**

42 Alternative A would reduce the total amount of temporary ground disturbance (8.07 acres less)
43 required along Segments 1, 2, and 3A compared to the proposed project. Alternative B would
44 reduce the total amount of temporary and permanent ground disturbance required along
45 Segment 4 (3.8 acres less) compared to the proposed project. Alternative A would prevent more
46 area from being disturbed, which would result in a lower risk to disturbing a previously

1 undiscovered cultural resources. Therefore, Alternative A would be the environmentally superior
2 alternative for the permanent impacts on cultural resources.

3
4 **Geology, Soils, and Minerals**

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

13
14 **Hazards and Hazardous Materials**

15 Alternatives A and B would include the use, transport, and dispose of the same types and generally
16 the same amount of hazardous materials as the proposed project. Alternatives A and B would
17 include the use of the same construction equipment and material and would occur within the same
18 area as the proposed project. Therefore, the proposed project would be the environmentally
19 superior alternative for the temporary impacts on hazards and hazardous materials.

20
21 **Hydrology and Water Quality**

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

31
32 **Land Use and Planning**

33 Alternatives A and B would occur within the same areas as the proposed project. Therefore, the
34 proposed project would be the environmentally superior alternative for the permanent impacts on
35 land use and planning.

36
37 **Noise**

38 Alternative A would reduce temporary ambient noise level increases along Segment 3A during
39 construction compared to the proposed project. Alternative B would increase temporary ambient
40 noise levels along Segment 4 during construction and operations compared to the proposed project.
41 Therefore, Alternative A would be the environmentally superior alternative for the
42 temporary impacts from noise.

43
44 **Population and Housing**

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

1 proposed project would be the environmentally superior alternative for the temporary impacts on
2 land use and planning.

3
4 **Public Services and Utilities**

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

10
11 **Recreation**

12 Alternatives A and B would require a similar number of workers, which would be drawn from
13 existing populations within or near the project area, as the proposed project. Therefore, the
14 proposed project would be the environmentally superior alternative for the temporary impacts on
15 recreation facilities.

16
17 **Traffic and Transportation**

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

23
24 **Cumulative Impacts**

25 Alternatives A and B would be similar to the cumulative impacts of the proposed project. Therefore,
26 the proposed project would be the environmentally superior alternative for the temporary and
27 permanent cumulative impacts.

28
29 **Growth Inducing**

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

35
36 **5.4 Conclusion**

37
38 The proposed project would be the environmentally superior alternative for nine of the resources
39 by default, which means Alternatives A and B would have similar impacts as the proposed project.
40 Alternative A would be the environmentally superior alternative for six of the resources, including
41 the significant air quality impact. Alternative B would be the environmentally superior
42 alternative for two resources but would result in similar air quality impacts to the proposed project.
43 Although air emissions are reduced under Alternative A, the reduction is minimal considering that
44 the majority of the air impacts would result from project activities that would occur under both
45 alternatives. Further, the air emissions reductions that would result from leaving old components
46 in place are not considered substantial enough to justify implementation of Alternative A. Although
47 Alternative A would result in a slight reduction in the significant short-term air quality impact, the

- 1 long-term benefit of removing abandoned infrastructure and rehabilitating small portions of the
- 2 project area would outweigh the minor short-term emissions reductions. Therefore, the proposed
- 3 project is considered the environmentally superior alternative.