CHAPTER 6
Comparison of Alternatives

This section summarizes and compares the environmental advantages and disadvantages of the Proposed Project and alternatives evaluated in this Environmental Impact Report (EIR). This comparison is based on the assessment of environmental impacts of the Proposed Project and each alternative, as identified in Sections 5.1 through 5.18. Chapter 3, *Project Description*, describes the Proposed Project. Chapter 4, *Project Alternatives*, introduces and describes the alternatives considered in this EIR as well as the alternatives that were screened from full analysis.

Section 6.1 describes the methodology used for comparing alternatives. Section 6.2 summarizes the environmental impacts of the Proposed Project and the alternatives. Section 6.3 defines the Environmentally Superior Alternative, based on comparison of each alternative with the Proposed Project.

6.1 Comparison Methodology

The California Environmental Quality Act (CEQA) does not provide specific direction regarding the methodology of alternatives comparison. Each project must be evaluated for the issues and impacts that are most important; this varies depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those where significant impacts would occur or where there would be long-term impacts (e.g., visual impacts and permanent loss of habitat or land use conflicts). Impacts that are easily mitigable to less-than-significant levels are generally considered to be less important.

This comparison is designed to satisfy the requirements of CEQA Guidelines Section 15126.6(d), Evaluation of Alternatives, which states that:

> *"The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the proposed project as proposed."*

If the Environmentally Superior Alternative is the No Project Alternative, CEQA requires identification of an Environmentally Superior Alternative among the other alternatives (CEQA Guidelines §15126.6[e][2]).

The following methodology was used to compare alternatives in this EIR:

Step 1: **Identification of Alternatives.** As described in Chapter 4, *Project Alternatives*, an alternatives screening process was used to identify six alternatives to the Proposed Project. That screening process identified no alternatives for detailed EIR analysis that would avoid or substantially lessen any of the significant effects of the Proposed Project, while obtaining the basic CEQA objectives for the Proposed Project, and being feasible. Two "no project" alternatives were identified for detailed EIR analysis.

Step 2: **Determination of Environmental Impacts.** The environmental impacts of the Proposed Project and the two no project alternatives were identified in Sections 5.1 through 5.18.

Step 3: **Comparison of Proposed Project with Alternatives.** The environmental impacts of the Proposed Project were compared to the environmental impacts of each of the no project alternatives to determine the Environmentally Superior Alternative.

6.2 Evaluation of Project Alternatives

Two no project alternatives were identified for evaluation in this EIR. This section compares the potential environmental impacts for the Proposed Project with the environmental impacts of the two no project alternatives. A detailed analysis of environmental impacts and mitigation for the no project alternatives is provided in Sections 5.1 through 5.18.

There would be significant and unavoidable (Class I) impacts pertaining to air quality and noise under the Proposed Project and No Project Alternative 2 (**Table 6-1**). A significant and unavoidable impact on air quality is identified for construction activities that would generate ozone precursor emissions (i.e., nitrogen oxides [NO_x]) that could contribute substantially to a violation of ozone air quality standards; this impact is also cumulatively considerable. Significant and unavoidable noise-related impacts are also identified for the Proposed Project for construction activities that would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria during the day or at night, and for potential nighttime construction activities in the cities of Moorpark and/or Thousand Oaks. Significant and unavoidable noise-related impacts are also identified for No Action Alternative 2 for construction activities that would generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria.

In addition to the significant and unavoidable impacts described above, there are several differentiating impacts that with mitigation would be less than significant. **Table 6-2** provides a comparison of potential impacts by alternative for each resource category.

TABLE 6-1
SUMMARY OF SIGNIFICANT AND UNAVOIDABLE (CLASS I) ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES

Proposed Project/ Alternative	Significant (Class I) Impacts
Proposed Project	Construction-related daily exhaust emissions of NO_x (maximum of approximately 346 pounds per day) would exceed the applicable significance threshold, resulting in emissions that could contribute to a violation of ozone air quality standards, which would be individually significant as well as cumulatively considerable.
	Daytime construction activities associated with at least one conductor stringing site and one helicopter landing zone would exceed the Ventura County construction noise threshold criteria, and nearly all nighttime construction activities within 1,000 feet of Ventura County sensitive receptors would exceed the Ventura County construction noise threshold criteria. Potential nighttime construction-related activities would generate noise levels that would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.
No Project Alternative 2	Construction-related daily exhaust emissions of NO_x (maximum of approximately 216 pounds per day) would exceed the applicable significance threshold, resulting in emissions that could contribute to a violation of ozone air quality standards, which would be individually significant as well as cumulatively considerable.
	Construction activities associated with Tubular Steel Poles (TSPs) and foundation removal would likely exceed the Ventura County construction noise threshold criteria. In the unlikely event that nighttime construction was required, construction-related nighttime noise levels would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.

6.3 Environmentally Superior Alternative

As discussed in the previous section, the Proposed Project and No Project Alternative 2 would have significant and unavoidable impacts pertaining to air quality and noise. The extent of the unavoidable impacts on air quality resources and noise varies slightly between the Proposed Project and No Project Alternative 2, with slightly greater impacts under the Proposed Project for both air quality and noise. Impacts to air quality and noise could not be mitigated to less-than-significant levels for either the Proposed Project or No Project Alternative 2.

Resource categories where environmental impacts would either be materially lessened or increased by implementing an alternative to the Proposed Project are discussed below.

- **Air Quality** – Impacts would be significant and unavoidable for the Proposed Project and No Project Alternative 2. Compared to the Proposed Project, No Project Alternative 2 would result in lower peak daily emissions, with the Proposed Project generating a maximum of approximately 346 pounds of NO_x on the peak day of construction and No Project Alternative 2 generating a maximum of approximately 216 pounds of NO_x on the peak day of construction. No Project Alternative 1 would result in no NO_x emissions and no impact to air quality.

- **Noise** – Impacts would be significant and unavoidable for the Proposed Project and No Project Alternative 2. Under the Proposed Project, conductor installation activities at the stringing site north-northeast of the intersection of Hitch Boulevard and Ventavo Road, and helicopter landings and takeoffs at the helicopter landing zone near the end of Proposed Project Segment 2 would result in noise levels that would exceed the county's construction

TABLE 6-2
PROPOSED PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	No Project Alternative 1	No Project Alternative 2
Aesthetics	Impacts determined to be Class II and Class III. **Most Impact**	There would be no impact.	Impacts would be less than the Proposed Project for construction, and beneficial for operations. **Least Impact**
Agriculture and Forestry Resources	Impacts determined to be Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be less than the Proposed Project.
Air Quality	Impacts determined to be Class I, Class II, and Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Biological Resources	Impacts determined to be Class II and Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Cultural Resources	Impacts determined to be Class II and Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Energy Conservation	Energy consumption impacts determined to be Class III; impacts to energy supplies/capacity/resources would be Class IV. **Most Impact** related to energy consumption. **Least Impact** related to energy supplies/capacity/resources.	Impacts would be less than the Proposed Project related to energy consumption, and greater than the Proposed Project related to energy supplies/capacity/resources. **Least Impact** related to energy consumption.	Impacts would similar to but slightly less than the Proposed Project related to energy consumption and greater than the Proposed Project related to energy supplies/capacity/resources.
Geology and Soils	Impacts determined to be Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Greenhouse Gas Emissions	Impacts determined to be Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Hazards and Hazardous Materials	Impacts determined to be Class II and III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Hydrology and Water Quality	Impacts determined to be Class II. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to, but slightly less than Proposed Project.

TABLE 6-2 (Continued)
PROPOSED PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	No Project Alternative 1	No Project Alternative 2
Land Use and Planning	There would be no impact. **No Preference**	There would be no impact. **No Preference**	There would be no impact. **No Preference**
Mineral Resources	There would be no impact. **No Preference**	There would be no impact. **No Preference**	There would be no impact. **No Preference**
Noise	Impacts determined to be Class I and III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar but slightly less than the Proposed Project.
Population and Housing	Impacts determined to be Class III. **No preference**	There would be no impact. **Least Impact**	Impacts would be similar to the Proposed Project. **No preference**
Public Services	There would be no impact. **No Preference**	There would be no impact. **No Preference**	There would be no impact. **No Preference**
Recreation	Impacts determined to be Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Transportation and Traffic	Impacts determined to be Class II and Class III. **Most Impact**	There would be no impact. **Least Impact**	Impacts would be similar to but slightly less than Proposed Project.
Utilities and Service Systems	Impacts determined to be Class III. **No Preference**	There would be no impact. **Least Impact**	Impacts would be similar to the Proposed Project. **No Preference**

noise threshold criteria. In addition, in the event that Proposed Project construction activities occur at night ambient noise levels at nearby sensitive receptors would substantially increase in the cities of Moorpark and Thousand Oaks. No Project Alternative 2 would result in an exceedance of Ventura County noise thresholds at a TSP removal location near a residence off Buggy Lane in unincorporated Ventura County. Although it is unlikely that No Project Alternative 2 would require nighttime construction, if it did, it would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks. No Project Alternative 1 would result in no noise generation, and no impact from noise.

No Project Alternative 1 would not result in any significant and unavoidable impacts, and would therefore be the Environmentally Superior Alternative. The Proposed Project would not be built and would therefore have no environmental impacts related to construction, operation, and maintenance. However, from an operational perspective, none of the Proposed Project objectives would be achieved and demand for electricity in the Electrical Needs Area (ENA) would not be adequately met. The ENA would potentially experience a shortage of electricity and the electrical system could become vulnerable to upset until a new project could be designed, permitted, and constructed to provide additional transmission capacity and reliability to the area. The improved system reliability and operating flexibility associated with the Proposed Project would not occur. Therefore, without upgrades to the existing system, as new facilities are added, the system would experience system-wide power flow and reliability problems due to overloading of the existing system, such as curtailed generation, thermal overload, and blackouts.

No Project Alternative 2 would also not achieve any of the Proposed Project objectives, and similar to No Project Alternative 1, could result in the ENA experiencing a shortage of electricity, the effects of which would include the electrical system becoming vulnerable to upset until a new project could be designed, permitted, and constructed to provide additional subtransmission capacity and reliability to the area. No Project Alternative 2 would result in beneficial impacts to aesthetics after the completion of construction, as it would remove industrial infrastructure from the viewshed. However, like the Proposed Project, it would result in significant and unavoidable impacts pertaining to air quality and noise, and greater impacts (Class II and Class III) than No Project Alternative 1 for the following resource areas: agriculture and forestry resources, biological resources, cultural resources, energy conservation, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, population and housing, recreation, traffic and transportation, and utilities and service systems. For these reasons, No Project Alternative 2 is not the Environmentally Superior Alternative.

CEQA Guidelines 15126(e)(2) requires that if the Environmentally Superior Alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As discussed in Chapter 4, *Project Alternatives,* the EIR team looked for alignment and/or system alternatives to the Proposed Project that could feasibly accomplish most of the basic objectives of the Proposed Project and could avoid or substantially lessen one or more of the significant effects (CEQA Guidelines §15126.6(c)), but did not identify any alternatives that met these criteria. Therefore, the Proposed Project would be the Environmentally Superior Alternative, as there are no suitable alternatives that are not "no project" alternatives.