

CHAPTER 8

Other CEQA Considerations

8.1 Significant Unavoidable Environmental Effects

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) identify significant environmental effects of the Proposed Project that cannot be avoided, including those that can be mitigated, but not to a less-than-significant level. The Proposed Project would result in short term impacts to air quality and noise-sensitive receptors, that even with implementation of mitigation measures, would remain significant unavoidable. Construction activities from the Proposed Project would generate ozone precursor emissions (i.e., nitrogen oxides [NO_x]) that could contribute substantially to a violation of ozone air quality standards, and would result in pollutant emissions of NO_x that would be cumulatively considerable. Construction activities would also generate noise levels in unincorporated Ventura County that would exceed Ventura County construction noise threshold criteria and potential construction-related nighttime noise levels would substantially increase ambient noise levels in the cities of Moorpark and Thousand Oaks.

As discussed in Chapter 4, *Project Alternatives*, a number of alternatives were analyzed to determine if they could meet the most basic Proposed Project objectives while avoiding or minimizing the significant impacts associated with the Proposed Project. Only Alternative 4 (Reconnect the Camgen Generator to the Moorpark Subtransmission System) would reduce the air quality and noise-related impacts that would be associated with the Proposed Project; however, this alternative was eliminated from full consideration in this EIR because it would not be a suitable long-term solution to avoid projected voltage violations. None of the other identified alternatives that would meet the essential objectives and feasibility criteria would reduce impacts associated with the Proposed Project to a less-than-significant level. Accordingly, impacts to air quality and noise-sensitive receptors could not be alleviated through development of alternatives.

8.2 Significant Irreversible Changes

Section 15126.2(c) of the CEQA Guidelines requires that an EIR identify significant irreversible environmental changes that would be caused by the Proposed Project. These changes may include, for example, uses of nonrenewable resources, or provision of access to previously inaccessible areas, as well as project accidents that could change the environment in the long-term. Development of the Proposed Project would require a permanent commitment of natural resources resulting from the direct consumption of fossil fuels, construction materials, the manufacture of new equipment that largely cannot be recycled at the end of the Proposed

Project's useful lifetime, and energy required for the production of materials. Furthermore, construction of the Proposed Project would also result in loss of a nominal amount of habitat from pole bases and access roads that provide habitat that can support special-status species. However, as evaluated in Section 5.4, *Biological Resources*, while the Proposed Project would impact biological resources, with implementation of mitigation and applicant proposed measures, impacts to biological resources would be less than significant.

Operation of the Proposed Project would allow for the transport of additional electrical power generated from renewable and non-renewable resources, although the Proposed Project itself would not require the future use of specific amounts of non-renewable resources. While the Proposed Project would facilitate the delivery of electrical power generated from non-renewable resources (e.g., natural gas), these resources would be exploited and expended now and in the near future regardless of the Proposed Project, as the production and use of the carbon-based products that would become electricity transported by the Proposed Project has been, or will be, approved by permitting agencies. Therefore, the primary and secondary impacts resulting from the Proposed Project would be less than significant.

Accidents, such as the release of hazardous materials, could trigger irreversible environmental damage. As discussed in Section 5.8, *Hazards and Hazards Materials*, construction of the Proposed Project would involve limited quantities of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, solvents, oils, etc., in order to fuel and maintain vehicles and other motorized equipment. An accidental spill of any of these substances could impact water and/or groundwater quality and, if a spill were to occur of significant quantity, the release could pose a hazard to construction workers, the public, as well as the environment. Considering the types and minimal quantities of hazardous materials that would be used for the Proposed Project and the emergency response plans and other procedures that would be required by the recommended mitigation measures, accidental release is unlikely. State and federal regulations and safety requirements, as described in the regulatory setting in Section 5.8 would ensure that public health and safety risks are maintained at acceptable levels, so that significant irreversible changes from accidental releases are not expected.

8.3 Growth-Inducing Effects

CEQA requires a discussion of the ways in which a project could induce growth. Section 15126.2(d) of the CEQA Guidelines identifies an impact as growth-inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees hired for proposed commercial and industrial development projects and population growth resulting from residential development projects represent direct forms of growth. Other examples of projects that are growth-inducing are the expansion of urban services into a previously unserved or under-served area, the creation or extension of transportation links, or the removal of major obstacles to growth. It is important to note that these direct forms of growth have secondary effects of expanding the size of local markets and attracting additional economic activity to the area.

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

8.3.1 Growth Caused by Direct and Indirect Employment

The number of workers required during peak construction would be a maximum of 217 construction personnel working on any given day. The Proposed Project construction activities would be temporary, estimated to last approximately 10 months. It is anticipated that all temporary positions would be filled from the local labor pool available in Ventura County, with workers expected to commute to the site rather than move. However, some construction personnel may need temporary accommodations. There is an adequate supply of hotels and motels in the Proposed Project area that could be utilized by the out-of-town personnel. Therefore, no growth in residential services would occur.

Proposed Project operation and maintenance would require minimal staffing that would be handled by current Southern California Edison (SCE) employees. Therefore, no new permanent jobs would be created. Overall, employment generated by the Proposed Project would have no impact on population growth because any short-term housing demand created during construction could be accommodated by existing units and no long-term growth would result from operation and maintenance of the Proposed Project.

8.3.2 Growth Related to Provision of Additional Electric Power

Construction of the Proposed Project is needed to meet electric system reliability and planned demand in the Moorpark System. The Moorpark System serves customers located in the communities of western Simi Valley, Moorpark, Thousand Oaks, Newbury Park, Westlake Village, Agoura, Agoura Hills, Oak Park, Hidden Hills, Topanga Canyon, Calabasas, Malibu, and portions of eastern unincorporated Ventura County, as well as portions of western unincorporated Los Angeles County. Therefore, the Proposed Project is designed to increase reliability and accommodate existing and planned electrical load growth, rather than to induce growth.

Growth in the Moorpark System is planned and regulated by applicable local general plans and planning and zoning ordinances. The provision of electricity is generally not considered an obstacle to growth nor does the availability of electrical capacity by itself normally ensure or encourage growth within a particular area. Other factors such as economic conditions, land availability, population trends, availability of water supply or sewer services, and local planning policies have a more direct effect on growth. Therefore, the Proposed Project would not indirectly induce growth by creating new opportunities for local industry or commerce.

