3.18 MANDATORY FINDINGS OF SIGNIFICANCE AND CUMULATIVE IMPACT ANALYSIS

3.18.1 INTRODUCTION AND METHODOLOGY

This section discusses mandatory findings of significance as well as potential cumulative impacts related to the Fulton-Fitch Mountain Reconductoring Project. Cumulative impacts, as defined in Section 15355 of the California Environmental Quality Act (CEQA) Guidelines, refer to two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts. A cumulative impact is the change in the environment that results from the incremental impact of a project when added to other closely related past, present, or reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant impacts occurring over time.

An analysis of potential cumulative impacts for each relevant resource topic is provided in Section 3.18.5, immediately following Table 3.18-2: Cumulative Projects in the Project Vicinity, which lists projects an approximately 1-mile radius of the project in urban areas and an approximately 2-mile radius of the project in less developed areas. The projects listed in Table 3.18-2, developed from available information on websites and with input and review by the involved agencies, were included because they have potential environmental impacts, geographic scope and location, and/or timing and duration of implementation similar to those of the Fulton-Fitch Mountain Reconductoring Project. The analysis considered the potential cumulative impacts that could result when impacts of the proposed project are considered in combination with impacts of other past, present, and reasonably foreseeable future projects. Some reasonably foreseeable future projects listed in Table 3.18-2 might not be approved or could be modified prior to approval; however, for the purpose of this analysis, approval and construction of identified projects was assumed.

3.18.2 MANDATORY FINDINGS OF SIGNIFICANCE

The analysis presented in this section is based on consideration of the CEQA checklist questions presented in Table 3.18-1. As discussed in this section, it has been determined that no substantial evidence exists that the project, when considering the whole record, will have a significant effect on the environment.

Would the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Have the potential to achieve short-term environmental goals to the disadvantage of long- term environmental goals?				
c) Have possible environmental effects that are individually limited, but cumulatively considerable? Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
d) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			\boxtimes	

 Table 3.18-1: CEQA Checklist for Mandatory Findings of Significance

a) Would the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory? *Less-than-Significant Impact with Mitigation*

Construction activities, which are temporary in nature, may have minor, short-term impacts on species habitat, populations, or communities, resulting in less-than-significant impacts. Eight special-status wildlife species have potential to occur in the Fulton-Fitch Mountain Reconductoring Project area (as summarized in Table 3.4-3: Special-Status Wildlife Species in Section 3.4, Biological Resources). Thirty-four special-status plant species initially were considered to have potential to occur in the project area (as summarized in Table 3.4-2: Special-Status Plant Species); however, comprehensive surveys for special-status plants were conducted and no special-status plant species were documented. Based on the amount of suitable habitat present for each species along the project alignment, impact avoidance strategies are likely to be easily implemented for all of these species. PG&E will implement Applicant-Proposed Measures (APMs) BIO-1 through BIO-5, and the project will not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or

wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare or threatened species. Therefore, the impact will be less than significant.

Cultural resource surveys and record searches identified along the Fulton-Fitch Mountain Reconductoring Project include 22 historical resources, one archaeological resource, and two isolated artifacts. Of these resources, two are isolated artifacts and do not need to be considered. Three resources—the existing 60 kV power line, Fulton Substation, and Fitch Mountain Substation—were formally evaluated and found ineligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). The remaining resources have not been formally evaluated for listing in the NRHP or CRHR. With implementation of APM CR-1, known cultural resources will be avoided; thus, no impacts will occur to examples of California history or prehistory. In the unlikely event that historical resources are discovered during construction activities, APM CR-2 will be implemented so the project will not eliminate important examples of major periods of California history or prehistory; therefore, the impact will be less than significant.

The Fulton-Fitch Mountain Reconductoring Project is underlain by three sensitive geologic units likely to be impacted by project construction; significant paleontological resources that could occur within the Sonoma Volcanics, Glen Ellen formation, and Pleistocene older alluvial fan deposits could be impacted by pole installation and preparation of construction work areas, including grading. PG&E will implement APMs PAL-1 through PAL-4 to reduce these potential impacts on California prehistory to a less-than-significant level; therefore, the impact will be less than significant with mitigation.

b) Would the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals? *No Impact*

The Fulton-Fitch Mountain Reconductoring Project will not achieve short-term environmental goals to the disadvantage of long-term environmental goals, and will result in either no impact or less-than-significant impacts in both the short and long term. The Fulton-Fitch Mountain Reconductoring Project will be compatible with local environmental goals and will not conflict with federal or state environmental policies and regulations. Therefore, no impact will occur.

c) Would the project have possible environmental effects that are individually limited, but cumulatively considerable? Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? *Less-than-Significant Impact*

A cumulative impact analysis for each resource area is presented in Section 3.18.5. The Fulton-Fitch Mountain Reconductoring Project will contribute incrementally to cumulative impacts in the project area related to air quality; biological resources; cultural resources; geology, soils, and seismic potential; greenhouse gas (GHG) emissions; hazards and hazardous materials; hydrology and water quality; recreation; and traffic; however, the project will not contribute substantially to those cumulative impacts. Thus, the Fulton-Fitch Mountain Reconductoring Project will not have environmental effects that are individually limited but cumulatively considerable. Therefore, the impact will be less than significant.

d) Would the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? *Less-than-Significant Impact*

The Fulton-Fitch Mountain Reconductoring Project will not adversely affect human beings, either directly or indirectly. Potential construction impacts associated with human health include the presence of hazards, hazardous materials use, potential for wildland fires, and temporary air quality impacts. As discussed previously, construction impacts associated with air quality and with hazards and hazardous materials will be less than significant. APMs will further reduce the potential for adverse effects. The Fulton-Fitch Mountain Reconductoring Project will have a beneficial effect on human beings in the project area by increasing electrical service capacity and reliability. Therefore, the impact will be less than significant.

3.18.3 CUMULATIVE IMPACTS

Projects included in the cumulative impact assessment were identified by using a list approach (CEQA Guidelines Section 15130[b][1][A]), including all pending development projects within an approximately 1-mile radius of the project in urban areas and an approximately 2-mile radius of the project in less developed areas. This analysis area includes parts of the Census Designated Places of Larkfield-Wikiup and Fulton, the Town of Windsor, the City of Healdsburg, and unincorporated Sonoma County. Table 3.18-2: Cumulative Projects in the Project Vicinity summarizes these pending development projects.

3.18.4 Key Projects in the Project Vicinity

Projects located in the vicinity of the project are listed in Table 3.18-2: Cumulative Projects in the Project Vicinity and shown in Figure 3.18-1: Cumulative Projects Map. Key projects in the project vicinity are defined as those projects which may overlap with the Fulton-Fitch Mountain Reconductoring Project construction timeline, and due to the significance of construction activities, could potentially contribute to cumulative impacts.

3.18.5 ANALYSIS OF CUMULATIVE IMPACTS

The purpose of the project, as described in Section 2.2, is to provide additional reliability and capacity to the existing system serving Sonoma County, not to provide service to new areas. New development will not be generated by this improved system reliability and capacity, and therefore, no project-related and cumulative growth-inducing impacts are expected. As described in Chapter 3.0, Environmental Impact Assessment, for agricultural and forest resources, land use and planning, mineral resources, population and housing, public services, and utilities and service systems, either the project has no impacts or the impacts are so minor that they would have no contribution to cumulative impacts in the area.

Implementation of APMs will further minimize less-than-significant short-term construction impacts related to aesthetics; air quality; cultural resources; geology, soils, and seismic potential; GHG emissions; hazards and hazardous materials; hydrology and water quality; recreation; and transportation and traffic. Implementation of APMs will reduce impacts on biological and paleontological resources to a less-than-significant level.

Project Name	Description/Location	Source	Proximity to Project Route* (miles)	Project Timing
Dialysis Facility	Construction of a new dialysis facility located at 18 East Fulton Road, Windsor	Sonoma County	0.6	Plan Check
Cardinal Newman High School Science Classrooms	Construction of a new science building at 50 Ursuline Road, Windsor	Sonoma County	1.3	Plan Check
Building A	Commercial shell building at 3770 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building B	Commercial shell building at 3750 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building J	Commercial shell building at 1740 Copperhill Parkway, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building K	Commercial shell building at 1760 Copperhill Parkway, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building L	Commercial shell building at 3580 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building M	Commercial shell building at 3550 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building R	Commercial shell building at 3500 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
Building S	Commercial shell building at 3330 North Laughlin Road, Santa Rosa	Sonoma County	2.0	Building Permit Issued
h3hotel	Development of a 39-room boutique hotel at 227 Healdsburg Avenue	City of Healdsburg	1	Current
Healdsburg Meat Company	404 Center Street	City of Healdsburg	1	Current
Healdsburg Avenue Bridge Project	Rehabilitation and retrofit of existing bridge spanning the Russian River on Healdsburg Avenue.	City of Healdsburg	1.0	Construction began September 2014, and is anticipated to last 12 – 14 months.
NT-4				

Table 3.18-2: Cumulative Projects in the Project Vicinity

Note:

* Distances are approximate.

Sources: City of Healdsburg Building Department 2015; Sonoma County Permit and Resource Management Department 2015; Sonoma County Transportation Authority 2015; Town of Windsor Community Development Department 2015.



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A discussion regarding each relevant resource area is provided in the following paragraphs.

Aesthetics: Cumulative development impacts on aesthetic resources in the project vicinity will not be significant, as the existing utility lines will continue to be part of the natural landscape viewshed. Alteration of the viewshed caused by the project will be relatively minor and consistent with the generally rural setting of the project area. No cumulative projects were identified that will impact the project area's viewshed. Therefore, the cumulative impacts on aesthetics would be less than significant.

Air Quality: The air emissions from construction of the Fulton-Fitch Mountain Reconductoring Project, as well as the nearby projects, will contribute to cumulative air quality issues, particularly by increasing the quantity of regional nonattainment air quality pollutants (Ozone, $PM_{2.5}$, and PM_{10}). Because the air emissions will be temporary and minor, and will only occur during limited portions of the 12-month construction period, the project will not have a cumulatively considerable impact on the region's air quality.

Additionally, the Bay Area Air Quality Management District has established recommended guidelines for management of emissions during construction of projects within the region; the APMs in this document follow those guidelines, thereby further minimizing the significance of the project's contribution to regional air quality.

Biological Resources: The project has the potential to affect biological resources, including California red-legged frog, California tiger salamander, American badger, western pond turtle, bats, and nesting birds. With implementation of APMs BIO-1 through BIO-9, pre-construction surveys will be conducted and biological monitoring and appropriate buffers set up as needed, and the project will have a less-than-significant effect on terrestrial biological resources. No other construction activities with similar effects on biological resources were identified to occur concurrently in the vicinity of the project. This project is not part of a larger activity. Therefore, no cumulative effects on biological resources are anticipated to occur in association with this project.

Cultural and Paleontological Resources: The record search identified 20 cultural resources reports in the project area. Surface surveys and test excavations indicated that 22 historical sites or features, one archaeological resource, and two isolated artifacts are located within the project area; these resources will be avoided by PG&E. No historic properties listed on the NRHP or CRHR are located within the project area. Implementation of APMs CR-1 through CR-3 will ensure a less-than-significant impact on potential cultural resources during project construction, and no substantial contribution to any potential cumulative effects on unknown cultural resources from development of the other related projects.

Excavation activities within the older alluvial deposits and within the volcaniclastic deposits of the Sonoma Volcanics and Glen Ellen formation could adversely impact significant paleontological resources. Project activities that could impact paleontological resources in areas underlain by older alluvial deposits, the Sonoma Volcanics, or the Glen Ellen formation include pole installation and preparation of access roads. With implementation of APMs PAL-1 through PAL-4, PG&E will undertake pre-construction coordination, construction monitoring, resource

identification, museum storage, and reporting for paleontological resources, and will reduce potential project impacts to a less-than-significant level. No other projects with similar effects on paleontological resources were identified to occur near this project. This project is not part of a larger activity. Therefore, no cumulative effects on paleontological resources are anticipated to occur in association with this project.

Geology, Soils, and Seismic Potential: The project crosses the seismically active Rogers Creek fault in two places, and portions of the project are located within soils that are susceptible to landslide or expansive soils. However, geologic impacts are generally considered site specific, and depend on localized geology and soil conditions. Geologic and soil conditions at the project site would not contribute to geologic and soil conditions or related hazards at other cumulative project sites. Other planned and proposed projects within approximately 2 miles of the project would be subject to applicable regulations for grading, drainage, and construction that are similar to those for the proposed project. These regulations address the area's seismic potential and expansive, erodible, and unstable soils, and would reduce the potential for impacts resulting from site-specific geologic and soil conditions. Accordingly, no significant cumulative impacts are anticipated.

Greenhouse Gas Emissions: GHG emissions directly generated during construction will result in a less-than-significant, short-term impact on climate change. GHG emissions will be further reduced with implementation of APM GHG-1. As indicated in Table 3.7-2: Construction-Related Greenhouse Gas Emissions in Section 3.7, Greenhouse Gas Emissions, total GHG construction emissions in the form of CO_2e will be approximately 1,748.7 metric tons during the project's construction phase. These emissions amortized over a 30-year period equal approximately 58.3 metric tons per year, which will be substantially less than the significance threshold of 10,000 metric tons of CO_2e per year. Therefore, the GHG emissions generated by the project will not be cumulatively considerable and will not significantly contribute to global climate change.

While Fitch Mountain Substation's new circuit breakers could potentially emit a minor amount of SF_6 due to leakage during project operations, these emissions will generate a minor and insignificant amount of CO_2e emissions, and will be tracked annually per CARB's Regulation for Reducing SF_6 Emissions from Gas Insulated Switchgear. In addition, the new SF_6 circuit breakers will have an annual guaranteed maximum leakage rate of 0.5 percent. Therefore, operation of the project will not contribute substantially to climate change.

Hazards and Hazardous Materials: All potential impacts related to hazards and hazardous materials are considered less than significant or nonexistent with implementation of the APMs described in Section 3.8, Hazards and Hazardous Materials. During construction activities, there is an increased potential for accidental release of fluids from a vehicle or motorized piece of equipment. Any impacts associated with such an accidental release will be reduced to a less-than-significant level by implementation of APMs. Implementation of PG&E's standard hazardous substance control, emergency response, and health and safety procedures will further minimize less-than-significant impacts.

Hydrology and Water Quality: Project construction activities have the potential to affect water quality through the release of fuels or other hazardous materials near waters, and increased erosion caused by grading or vegetation clearing, which may lead to increased sedimentation in adjacent waters. Other projects in Table 3.18-2: Cumulative Projects in the Project Vicinity that could affect water quality include the Healdsburg Avenue Bridge and commercial building construction projects. Insufficient information is available at this time to determine which projects may be occurring in the same timeframe as the proposed work. However, especially given that implementation of the APMs described in Section 3.9, Hydrology and Water Quality, will further reduce less-than-significant impacts on hydrology and water quality, the project will not contribute substantially to any potential cumulative impacts on water quality.

Noise: The project will not have any long-term ambient noise level impacts. Short-term construction noise impacts may occur simultaneously at a few work locations along the overall length of the project, but will be primarily limited to daytime hours consistent with local noise ordinances. Unplanned nighttime work will be infrequent, will occur in limited locations, and will be short term. None of the projects listed in Table 3.18-2: Cumulative Projects in the Project Vicinity are in the near vicinity of the Fulton-Fitch Mountain Reconductoring Project. Therefore, the project will not contribute significantly to cumulative noise impacts.

Recreation: The project's contribution to impacts on recreation would be limited to trail closures in construction work areas. This minor disruption of recreational uses would be temporary and managed through the implementation of APM REC-1. The project will not alter the demand for existing or planned recreational facilities. Therefore, the project will not contribute significantly to cumulative recreation impacts.

Transportation and Traffic. The project's contribution to area traffic would be limited to a minor increase in vehicular traffic on roadways in the project vicinity during the construction period. This minor increase would be temporary and managed through the implementation of APMs TR-1 and TR-2. The minor increase will not represent a substantial increase in traffic volumes on local roads, or use of public transit, bicycle and pedestrian facilities, parking facilities, or emergency access. Because the project involves modifications to existing facilities, it will not result in increased vehicle traffic after construction is completed. Under cumulative conditions, the project will not alter the demand for existing or planned multimodal transportation options. Therefore, the project will have less-than-significant cumulative transportation impacts.

3.18.6 REFERENCES

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