

E. COMPARISON OF ALTERNATIVES

This section summarizes and compares the environmental advantages and disadvantages of the Proposed Project and the alternatives evaluated in this EIR. This comparison is based on the assessment of environmental impacts of the Proposed Project and each alternative, as identified in *Sections D.2 through D.13*. *Section C* introduces and describes the alternatives considered in this EIR; *Appendix 2* to this EIR includes the Alternatives Screening Report, which documents all alternatives considered in the screening process.

Section E.1 describes the methodology used for comparing alternatives. *Section E.2* defines the environmentally superior alternative, based on comparison of each alternative with the Proposed Project. *Section E.3* presents a comparison of the No Project Alternative with the alternative that is determined in *Section E.2* to be environmentally superior.

E.1 Comparison Methodology

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 will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with long-term impacts (*e.g.*, visual impacts and permanent loss of habitat or land use conflicts). Impacts associated with construction (*i.e.*, temporary or short-term) or those that are easily mitigable to less than significant levels are 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 Section 15126.6[e][2]).

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

- Step 1: Identification of Alternatives.** An alternatives screening process (described in *Section C* and *Appendix 2*) was used to identify over 30 alternatives to the Proposed Project. That screening process identified five alternatives for detailed EIR analysis. Four of the alternatives consist of SDG&E design options and one alternative consists of a transmission system alternative. A No Project Alternative was also identified. No other feasible alternatives meeting most of the basic project objectives were identified that would lessen or alleviate significant impacts.
- Step 2: Determination of Environmental Impacts.** The environmental impacts of the Proposed Project and alternatives were identified in *Sections D.2 through D.13*, including the potential impacts of construction and operation.
- Step 3: Comparison of Proposed Project with Alternatives.** The environmental impacts of the Proposed Project were compared to those of each alternative to determine the environmentally superior alternative. Because several alternatives involve only a portion of the proposed Project route, the environmentally superior option was determined for each relevant element of the Proposed Project. As a result, the environmentally superior alternative can be a combination of constituents of the Proposed Project with one or more alternatives. Once derived, the environmentally superior alternative was then compared to the No Project Alternative. Although this comparison focuses on the 12 issue areas (described in *Sections D.2 through D.13*), determining an environmentally superior alternative is difficult because of the many factors that must be balanced. Although this EIR identifies an environmentally superior alternative, it is possible that the decision-makers (the five members of the CPUC) could balance the importance of each impact area differently and reach a different conclusion.

E.2 Evaluation of Project Alternatives

Five alternatives in addition to the No Project Alternative were identified for evaluation in this EIR. A detailed analysis of environmental impacts and mitigation for all project alternatives is provided in *Sections D.2 through D.13*. *Table E-1* provides a summary of significant unmitigable (Class I) impacts for the Proposed Project and alternatives. *Table E-2* provides a summary of environmental impact conclusions for the Proposed Project and each of the alternatives for each environmental issue area.

TABLE E-1
Proposed Project vs. Alternatives: Summary of Significant Unmitigable (Class I) Impacts

Issue Area	Significant Impacts (Class I)
Proposed Project	
Visual Resources	V-2 (long-term visual impacts)
	KOP 1 – Residential - Mount Miguel Road
	KOP 2 – Residential - Coltridge Lane
	KOP 3 – Bonita Long Canyon Park
	KOP 4 – Residential – Pepperwood Court
	KOP 5 – Residential – Via Hacienda
	KOP 7 – Bonita Vista Middle School
	KOP 8 – Discovery Park
	KOP 9 – Residential – Chestnut Court
	KOP 10 – Sunridge Park
	KOP 11 - Residential – Blackwood Road
	KOP 13 – Sunbow Park
	KOP 14 – Residential Area, Crescent Drive
	KOP 15 – Greg Rogers Par
	KOP 16 – Residential - Raven Avenue
	KOP 18 – Residential – Spruce Street
	KOP 19 – Reinstra Ball Fields
	KOP 20 – SDG&E Park
	KOP 21 – Residential - Jacama Way
	KOP 22 – Residential - 5-10 Mobile Home Ranch
	KOP 24 – Residential – Lynwood South
	KOP 25 – Residential – Trenton Street
Alternatives – Class I Impacts Eliminated or Created by Alternative	
Transmission System 7 – Miguel to South Bay	Eliminates all Class I impacts to visual resources
South Bay Power Plant to Sweetwater River Overhead	Creates Class I impact to land use. Specifically Impact L-1 conflict with applicable land use plan, policy or regulation.

With the exception of visual impacts caused by the Proposed Project, there were no significant and unmitigable (Class I) impacts identified that could occur with the Proposed Project. As discussed in *Section D.13, Visual Resources*, significant and unmitigable (Class I) impacts were identified at various Key Observation Points (KOPs) between the Miguel Substation and South Bay Power Plant that would occur due to the Proposed Project. With the exception of the land use planning and policy conflicts due to the South Bay Power Plant Area to Sweetwater Overhead Design Alternative, there were no significant and unmitigable (Class I) impacts identified that could occur with the alternatives. As discussed in *Section D.7*, the South Bay

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

Issue Area	Proposed Project	Pacific Highway Bridge Attachment	Harbor Bridge Attachment	Sicard Street Transition Cable Pole	South Bay Power Plant to Sweetwater River Overhead	Transmission System 7 – Miguel to South Bay Power Plant
Air Quality	<p>Impacts A-1 through A-5 determined to be Class III.</p> <p>Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.</p>	<p>Impacts similar to Proposed Project, but would have a slightly longer construction time and impact area.</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance.</p> <p>Preferred design option at Harbor Bridge.</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance.</p> <p>Preferred design option for Sicard Street overhead to underground circuit transition.</p>	<p>Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance.</p> <p>Preferred from South Bay Power Plant to Sweetwater River Transition Area.</p>	<p>Impacts similar to Proposed Project, but would have a longer construction duration.</p>
Biological Resources	<p>Between Sycamore Canyon and Fanita Junction and Miguel Substation to Sweetwater River transition area, Impacts B-1 through B-8 were determined to be between Class II and Class III.</p> <p>Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.</p>	<p>No impacts would occur.</p> <p>No Preference</p>	<p>No impacts would occur.</p> <p>No Preference</p>	<p>No impacts would occur.</p> <p>No Preference</p>	<p>Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance within and adjacent to the Sweetwater Marsh.</p> <p>Preferred from South Bay Power Plant to Sweetwater River Transition Area.</p>	<p>Impacts B-1, B-2 would be greater due to additional construction activities and larger disturbance area, but would remain between Class II and Class III impacts.</p>
Cultural Resources	<p>Impacts C-1 and C-3 were determined to be Class III and Impact C-2 was determined to be Class II.</p> <p>Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old</p>	<p>Impacts similar to Proposed Project, but likelihood of encountering unknown resources would be slightly greater due to increased impact area of trenching.</p> <p>No Preference</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance and no trenching in bridge area.</p> <p>No Preference</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance area.</p> <p>No Preference</p>	<p>Impacts would be reduced due to reduced construction disturbance from attaching to existing overhead bridge structures.</p> <p>Preferred from South Bay Power Plant to Sweetwater River Transition Area.</p>	<p>Impacts similar to Proposed Project, but likelihood of encountering unknown resources would be slightly greater due to increased impact area.</p>

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Issue Area	Proposed Project	Pacific Highway Bridge Attachment	Harbor Bridge Attachment	Sicard Street Transition Cable Pole	South Bay Power Plant to Sweetwater River Overhead	Transmission System 7 – Miguel to South Bay Power Plant
<p>Geology, Soils and Paleontology</p>	<p>Town Substation.</p> <p>Impacts G-1 through G-7 were determined to be Class II and Class III.</p> <p>Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.</p>	<p>Geologic impacts are nearly identical to those associated with the Proposed Project.</p> <p>No Preference</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance and no trenching in bridge area.</p> <p>Preferred design option at Harbor Bridge</p>	<p>The geologic impacts are identical to those associated with the Proposed Project.</p> <p>No Preference</p>	<p>Impacts would be reduced due to reduced construction disturbance from attaching to existing overhead bridge structures.</p> <p>Preferred from South Bay Power Plant to Sweetwater River Transition Area.</p>	<p>Geologic impacts are nearly identical to those associated with the Proposed Project but would be slightly greater due to larger disturbance area.</p>
<p>Hydrology and Water Quality</p>	<p>Impacts H-1, H-2, H-6 and H-7 determined to be Class III and Impacts H-3, H-4, and H-5 were determined to be Class II and Class III.</p> <p>Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.</p>	<p>Would eliminate directional drill under San Diego River and therefore reduce H-3 and H-5 impacts from Class II to Class III.</p> <p>Preferred design option to crossing San Diego River</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance.</p> <p>Preferred design option at Harbor Bridge</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance.</p> <p>Preferred design option for Sicard Street overhead to underground circuit transition.</p>	<p>Would reduce construction disturbance area as well as eliminate directional drill under the Sweetwater Marsh and therefore would reduce hydrology and water impacts from Class II to Class III.</p> <p>Preferred (from South Bay Power Plant to Sweetwater River Transition Area)</p>	<p>Impacts H-1 through H-7 would be greater due to additional construction activities and larger disturbance area, but would remain Class II and Class III impacts.</p>
<p>Land Use, Agriculture and Recreation</p>	<p>Impacts L-1, L-2, L-6, and L-7 were determined to be Class III and Impacts L-3, L-4, L-5 and L-8 were determined to be Class II.</p> <p>Preferred from Sycamore Canyon to Fanita Junction and from South Bay Power</p>	<p>Impacts similar to Proposed Project, but would have a slightly longer construction time and impact area.</p>	<p>Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance.</p> <p>Preferred design option at Harbor Bridge.</p>	<p>Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance area.</p> <p>Preferred design option for Sicard Street overhead to</p>	<p>Would conflict with applicable land use plans and policies relevant to the City of Chula Vista Bayfront resulting in a Class I impact to Impact L-1.</p>	<p>Impacts associated with disruption of existing land use (Impact L-3) and recreational facilities (Impact L-5) would be slightly greater during construction due to additional activities and disturbance areas. However, long-term disruption would be reduced due to removal of existing lattice towers between the Proctor Valley Substation and South Bay</p>

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SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS**

Issue Area	Proposed Project	Pacific Highway Bridge Attachment	Harbor Bridge Attachment	Sicard Street Transition Cable Pole	South Bay Power Plant to Sweetwater River Overhead	Transmission System 7 – Miguel to South Bay Power Plant
	Plant to Old Town Substation.			underground circuit transition.		Substation. Preferred from Miguel Substation to South Bay Power Plant.
Noise and Vibration	Impacts N-3 and N-4 were determined to be Class III and Impacts N-1 and N-2 were determined to be Class II or Class III. Preferred	Impacts similar to Proposed Project, but would be slightly greater due to increased construction disturbance from trenching.	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option at Harbor Bridge	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option for Sicard Street overhead to underground circuit transition	Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance. Long-term noise impacts would be slightly greater due to corona noise from overhead components. However, long-term noise impacts were determined to be Class III.	Impacts similar to Proposed Project during operation and slightly greater during construction due to increased duration and disturbance area.
Public Health and Safety	Impacts PS-1 through PS-4 were determined to be Class II or Class III. Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.	Impacts similar to Proposed Project, but would be slightly greater due to increased construction disturbance from trenching.	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option at Harbor Bridge.	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option for Sicard Street overhead to underground circuit transition.	Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance. Preferred from South Bay Power Plant to Sweetwater River Transition Area.	Impacts PS-1 through PS-4 would be greater due to additional construction activities and larger disturbance area, but would remain Class II and Class III impacts.
Public Services and Utilities	Impacts U-1 through U-3 were determined to be Class II or Class III. Preferred from Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River	Impacts similar to Proposed Project, but would be slightly greater due to increased construction disturbance from trenching.	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option at Harbor Bridge	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option for Sicard Street overhead to	Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance. Preferred from South Bay Power Plant to Sweetwater River	Impacts U-1 through U-3 would be greater due to additional construction activities and larger disturbance area, but would remain Class II and Class III impacts.

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Issue Area	Proposed Project	Pacific Highway Bridge Attachment	Harbor Bridge Attachment	Sicard Street Transition Cable Pole	South Bay Power Plant to Sweetwater River Overhead	Transmission System 7 – Miguel to South Bay Power Plant
	Transition Area to Old Town Substation.			underground circuit transition.	Transition Area.	
Population and Housing	Impacts S-1 and S-3 were determined to have no impact and Impact S-2 was determined to be Class III. No Preference	Impacts would be the same as Proposed Project. No Preference	Impacts would be the same as Proposed Project. No Preference	Impacts would be the same as Proposed Project. No Preference	Impacts would be the same as Proposed Project. No Preference	Impacts would be the same as Proposed Project. No Preference
Transportation/Traffic	Impacts T-1 through T-9 were determined to be Class II or Class III. Preferred From Sycamore Canyon to Fanita Junction, Miguel to South Bay and from the Sweetwater River Transition Area to Old Town Substation.	Impacts similar to Proposed Project, but would be slightly greater due to increased construction disturbance from trenching. No Preference	Impacts similar to Proposed Project, but would be slightly reduced due to reduced construction disturbance. Preferred design option and Harbor Bridge.	Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance. Preferred design option for Sicard Street overhead to underground circuit transition.	Impacts similar to Proposed Project, but would be reduced due to reduced construction disturbance. Preferred from South Bay Power Plant to Sweetwater River Transition Area.	Impacts similar to Proposed Project but would be greater due to additional construction activities and larger disturbance area, but would remain Class II and Class III impacts.
Visual Resources	See <i>Table 4-1</i> for Class I impacts to Impact V-2. Impacts V-1, V-4 and V-4 were determined to be Class II or Class III. Preferred from Sycamore Canyon to Fanita Junction and from South Bay Power Plant to Old Town Substation.	Impacts would primarily be the same as Proposed Project. No Preference	Impacts would primarily be the same as Proposed Project. No Preference	Impacts would be slightly reduced due to the transition cable pole being less massive in size than the proposed transition station. Preferred design option for Sicard Street overhead to underground circuit transition.	Impacts would be greater. The new and modified structures would increase the industrial character between the South Bay Power Plant and Sweetwater Marsh from Class III to Class II impacts. Preferred from South Bay Power Plant to Sweetwater River Transition Area.	The visual effects of the alternative would be substantially less than the Proposed Project. The degree of overall change between the Miguel Substation and South Bay Power Plant when compared to the Proposed Project would range from beneficial (Class IV) to slightly adverse (Class III). Preferred from Miguel Substation to South Bay Power Plant.

Power Plant Area to Sweetwater Overhead Design Alternative is inconsistent with the recent MOU between SDG&E and the City of Chula Vista to underground existing facilities along the Chula Vista Bayfront and therefore this conflict is considered to be significant and can only be mitigated to less than significant by undergrounding as proposed in Proposed Project.

E.3 Environmentally Superior Alternative

Alternatives fall into two categories: project design options and alternative transmission system. The following identifies the environmentally superior alternative for each of these categories.

E.3.1 SDG&E Design Option Alternatives

Pacific Highway Bridge Attachment

The Pacific Highway Bridge Attachment Design Alternative is the same as the OMPPA Transmission Project, except in the vicinity of where the Miguel – Old Town 230 kV underground line crosses the San Diego River. Under this alternative, the 230 kV line cable would be attached to the Pacific Highway Bridge rather than directional drilled under the San Diego River as proposed by the OMPPA Transmission Project.

The EIR analysis indicates that identified long-term significant impacts to environmental resources (Impact H-5, encroachment into a floodplain) resulting from the proposed construction and operation of the proposed 230 kV cable underneath the San Diego River can be mitigated to less than significant. The EIR also indicates that project-related impacts, although mitigated to less than significant, would be avoided if the project were implemented by attaching the proposed 230 kV cable on the Pacific Highway Bridge. While the Pacific Highway Bridge Attachment Alternative would require additional trenching in City of San Diego roadways within commercial and industrial areas, resulting impacts associated with construction would be short-term and easily mitigable to less than significant. Therefore, from a strictly environmental perspective, the Pacific Highway Bridge Design Alternative would rank as the environmentally superior design option to crossing the San Diego River as it would eliminate identified long-term hydrology related impacts while not resulting in more overall impacts than the Proposed Project.

Harbor Drive Bridge Attachment

The Harbor Drive Bridge Attachment Design is an alternative to boring under the Harbor Drive Bridge as proposed by the OMPPA Transmission Project. With the exception of the crossing of the Harbor Drive Bridge, this alternative is the same as the proposed OMPPA Transmission Project. The EIR analysis indicates that identified significant impacts to the 10th Avenue Marine Terminal, a busy entry port for cargo, due to disruption caused by the proposed construction/

boring of the proposed 230 kV cable under the Harbor Drive Bridge, can be mitigated to less than significant. The EIR also indicates that project-related impacts, although mitigated to less than significant, would be reduced if the project were implemented by attaching the proposed 230 kV cable on the Harbor Drive Bridge, while not resulting in more overall impacts than the Proposed Project. Therefore, from a strictly environmental perspective, the Harbor Drive Bridge Attachment Design Alternative would rank as the environmentally superior design option to boring underneath the Harbor Drive Bridge.

Sicard Street Transition Cable Pole

The Sicard Street Transition Cable Pole is an alternative to development of the Sicard Street Transition Station as proposed by the OMPPA Transmission Project. Aside from the design of the transition structures, this alternative would not alter any other aspects of SDG&E's proposed OMPPA Transmission Project.

The EIR analysis indicates that the identified impacts to parking and visual resources resulting from the proposed Sicard Street Transition station would be less than significant. The EIR also indicates that project-related impacts, although less than significant, would be reduced if the transition cable pole design alternative were implemented. Compared to the proposed transition structure design, the cable pole design is less industrial in scale and mass, and would take less space in the parking lot, thereby minimizing both visual impacts and land use impacts resulting from physical ground disturbances. Therefore, from a strictly environmental perspective, the Sicard Street Transition Cable Pole design alternative would rank as the environmentally superior design option to transition the proposed 230 kV line from overhead to underground at Sicard Street.

South Bay Power Plant Area to Sweetwater River Overhead Alternative

This alternative would be the same as the Proposed Project, except along the Chula Vista Bayfront, between the South Bay Power Plant Area and Sweetwater River Transition Area where this alternative would consist of placing the new 230 kV line overhead instead of underground as proposed by the OMPPA Transmission Project.

The EIR analysis indicates that identified significant impacts to biological resources, water quality, hazardous materials and geotechnical hazards due to proposed undergrounding between the South Bay Power Plant to the Sweetwater River Transition Area can be mitigated to less than significant. The EIR also indicates that project-related impacts, although mitigated to less than significant, would be reduced to these environmental resources if the South Bay Power Plant Area to Sweetwater River Overhead Design Alternative were implemented. Impacts to these resource areas would be reduced because the proposed trenching and boring proposed by the

OMPPA Transmission Project would generally require more work to install the new 230 kV transmission line in comparison to the overhead alternative, which means that construction-related impacts would be more intense. However, the EIR analysis also indicates that while the undergrounding proposed by the OMPPA Transmission Project between the South Bay Power Plant Area and the Sweetwater River would be consistent with applicable land use plans and policies, the South Bay Power Plant Area to Sweetwater River Overhead Option would conflict with applicable land use plans and policies (Chula Vista Bayfront Specific Plan and Chula Vista Local Coastal Program Land Use Plan) and is inconsistent with the recent MOU between SDG&E and the City of Chula Vista to underground existing transmission facilities along the Chula Vista Bayfront. This conflict is considered to be significant and can only be mitigated to less than significant by undergrounding along the Chula Vista Bayfront as proposed in the OMPPA Transmission Project. While the South Bay Power Plant Area to Sweetwater River Overhead Alternative would reduce short-term construction related impacts associated with the Proposed Project, it would cause potential long-term conflicts with applicable land use plans and policies regarding the City of Chula Vista Bayfront. Therefore, from a strictly environmental perspective, the undergrounding proposed by the OMPPA Transmission Project (see *Section B* of this EIR, Segment 3 – South Bay Power Plant Area to Sweetwater River Transition Area) would rank as the environmentally superior design option to install the proposed 230 kV line from the South Bay Power Plant Area to the Sweetwater River Transition Area.

E.3.2 Transmission System Alternative

Transmission System Alternative 7 PV1 Variation – Miguel Substation to South Bay Power Plant

Under this alternative, the OMPPA Transmission Project would be developed as proposed with the exception that between the Miguel Substation and the South Bay Power Plant Area, the Transmission System Alternative would be implemented as an alternative to Segment 2 (Miguel Substation to South Bay Power Plant Area) of the Proposed Project. Under this alternative, the 63 new double line transmission steel poles between Miguel and South Bay Power Plant Area as proposed in the OMPPA Transmission Project would be developed, but the transmission system would be reconfigured to allow the removal of the existing lattice towers between Proctor Valley and the South Bay Power Plant Area. Removal of the existing lattice towers would be made possible by this transmission system alternative, which would include removing one of the existing 138 kV transmission lines currently on the existing lattice towers and installing the other existing 138 kV line currently on the existing lattice towers on the second position of the new double line transmission poles that constitute the Miguel to South Bay portion of the proposed OMPPA Transmission Project. As further described in *Section C.4.3*, modifications to the Proctor Valley, Miguel and Los Coches substations, as well as addition of a second 138 kV

transmission line from the Miguel Substation to the Proctor Valley Substation, would be required.

The EIR analysis indicates that from the Miguel Substation to I-5, the Proposed Project would have long-term significant and unavoidable (Class I) visual impacts to views from a number of local residential neighborhoods, park and recreation areas, and public facilities. Long-term significant and unavoidable (Class I) visual impacts would result from the proposed OMPPA Transmission Project since the 230 kV line would be installed on single steel poles that would be viewed in conjunction with the existing 138 kV lattice towers. Taken together, the existing and proposed transmission structures would create a visually dominant industrial corridor through residential areas of Chula Vista. The differences in form and design between the existing lattice towers and proposed single steel pole structures would contribute to the visual disharmony and industrial character of the SDG&E ROW. The significant visual impacts from the OMPPA Transmission Project would occur primarily within a foreground viewing distance (within 0.5 mile) where the new structures and lines would be clearly visible in conjunction with the existing lattice structures.

Under the Transmission System Alternative, the significant visual impacts of the Proposed Project would be reduced to a level less than significant (Class III) from the Proctor Valley Substation to west of I-5, near proposed structure number 510. Under this scenario, the existing lattice tower structures and conductors would be removed from the Proctor Valley Substation to the South Bay Substation area, and replaced with the double-line 230 kV steel poles that would support one of the existing 138 kV lines and the proposed OMPPA 230 kV line. Long-term visual changes would be slightly adverse to beneficial along almost the entire length of SDG&E's ROW in the City of Chula Vista, east of I-5. The visual changes of the alternative would be evident from residential neighborhoods, local community parks and recreation areas, and public schools and institutions. This would result in the SDG&E ROW appearing substantially less industrial in character and form, and more similar in urban design to other community facilities, such as distribution poles and lighting facilities. Due to the beneficial visual effects of removing the existing 138 kV lattice towers, the visual impacts of the new 230 kV double line steel poles and conductors would be less than significant (Class III) when compared to the existing setting. While implementation of this alternative would reduce long-term visual impacts from Class I significant and unavoidable to Class III, less than significant, from the Proctor Valley Substation to the South Bay Power Plant, the removal of the existing lattice towers and placement of the existing 138 kV line would cause increased short-term impacts to biological resources, soil erosion, noise, solid waste disposal, traffic disruption and short-term disruption to recreational facilities due to more intense construction. While the EIR analysis indicates that short-term construction impacts generated by this alternative are significant, they can be mitigated to less than significant (Class II). Therefore, from a strictly environmental perspective, the Transmission System Alternative ranks as the environmentally

superior transmission system alternative between the Miguel Substation and South Bay Power Plant as it would reduce long-term visual impacts from significant and unavoidable (Class I) to less than significant (Class III), while only increasing temporary short-term impacts associated with construction that are easily mitigable to less than significant.

E.3.3 Summary of the Environmentally Superior Alternative

The Environmentally Superior Alternative as defined in *Section E.3.1 and E.3.2* is shown in *Figure E-1* and would be a combination of the Proposed Project, the Pacific Highway Bridge Attachment, Harbor Drive Bridge Attachment, and Sicard Street Cable Pole Design Option Alternatives along with the Transmission System Alternative 7 PV1 Variation – Miguel to South Bay Power Plant.

E.4 No Project Alternative vs. the Environmentally Superior Alternative

E.4.1 Summary of No Project Alternative and its Impacts

The No Project Alternative is described in *Section C.6*. Under the No Project Alternative, there is a possibility that, without the project, the OMGP would either be cancelled or delayed. There is also a possibility that new generation capacity and/or transmission capacity could be necessary in San Diego County or elsewhere to compensate for existing system limitations and anticipated loads. It would be speculative to predict the type and location or schedule of development for new power plants and transmission needed to overcome the transmission system constraints remaining under the No Project Alternative. However, for purposes of this analysis, the No Project Alternative could include either of the following components or combination of components:

- Construction of new transmission facilities at either 500 kV or 230 kV that would require the development of a new transmission corridor from either the east or north into the San Diego region.
- Construction of additional regional generation.
- System management and planning would continue to occur (management of load, reduction of demand, possible electric service curtailments).

The environmental impacts of the No Project Alternative would primarily result from operation of gas-fired turbine generators and/or development of new transmission. Long-term operational impacts from power generation include substantial air emissions and ongoing noise near the generators, as well as visual impacts of the generators depending on their locations. Construction and operation of new transmission facilities would primarily be the same as those

Figure E-1 Environmentally Superior Alternative

identified for the Proposed Project with the exception of land use and visual resources which could be greater if developed within a new transmission corridor.

E.4.2 Summary of the Environmentally Superior Alternative and Its Impacts

The Environmentally Superior Alternative as defined in *Section E.3.3* would be a combination of the Proposed Project, the Pacific Highway Bridge Attachment, Harbor Drive Bridge Attachment, and Sicard Street Cable Pole Design Option alternatives along with the Transmission System Alternative 7 PV1 Variation – Miguel to South Bay Power Plant. Project operation would have no operational air emissions and would have minimal effects on sensitive biological resources, land use, planned roadway improvements, and visual impacts. Short-term impacts would include construction disturbance (noise, dust, air emissions, land use disruption and traffic disruption, and public health and safety). Impacts of the Environmentally Superior Alternative are defined in each issue area's impact analysis for the SDG&E Proposed Project, the Pacific Highway Bridge Attachment, Harbor Drive Bridge Attachment, and Sicard Street Cable Pole design option alternatives as well as the Transmission System 7 PV1 Variation – Miguel to South Bay Power Plant. The Environmentally Superior Alternative would have no significant and unmitigable (Class I) impacts. The following impacts would occur, but they would be mitigable to less than significant levels:

- Construction disturbances from dust, air emissions, hazardous materials, noise, traffic, soil erosion and public utilities.
- Disruption of recreational activities between the Miguel Substation and Sicard Street Transition Area.
- Temporary and permanent impacts to sensitive biological resources.
- Potential impacts due to geologic hazards.
- Potential impacts to unknown cultural resources.
- Increased potential for impacts to water quality during construction.

CONCLUSION: Comparison of Environmentally Superior Alternative with No Project Alternative

The Environmentally Superior Alternative would be located within the SDG&E ROW and underground within city streets with minimal long-term impacts on residences or other sensitive land uses. In comparison, long-term impacts to many environmental issue areas could occur under the No Project Alternative. Development of new power plants and/or new transmission facilities under the No Project Alternative would likely result in some level of long-term regional impacts to air quality, biological resources, water quality, noise, public health, and

visual resources. Overall, the Environmentally Superior Alternative is preferred over the No Project Alternative.