

6. Other CEQA Considerations

The State CEQA (California Environmental Quality Act) Guidelines (Section 15126.2 et al.) require consideration and discussion of certain mandatory topics in an EIR. Some of these topics are discussed throughout Chapter 4, *Environmental Impact Analysis*, of this SEIR, including significant unavoidable environmental impacts. Those topics are summarized in this section, as well as discussion of other required topics, including:

- Significant Unavoidable Environmental Impacts,
- Significant Irreversible Environmental Changes,
- Energy Conservation,
- Growth-Inducing Impacts, and
- Effects Found Not to Be Significant.

6.1 Significant Unavoidable Impacts

The impact analysis presented in Chapter 4 discloses the environmental impacts of the proposed Project, including adverse impacts that would remain significant even with the implementation of feasible mitigation measures. Below is a list of the adverse impacts identified and described in Chapter 4 that are significant and unavoidable (Class I).

- **VIS-1: WTG Visibility.** Construction and operation of the WTGs and related structures have the potential to be visible in the vicinity of the Project.
- **VIS-2: Views from Jalama Beach.** Westernmost WTGs would be visible to users of Jalama Beach County Park.
- **VIS-5: Transmission Line Visibility.** Construction and operation of the transmission line could be visible from public roadways and residential areas (south Lompoc roads, residential areas, and portions of San Miguelito Road).
- **VIS-7: San Miguelito Road Landscape.** Vehicular transport of Project components would require road widening and tree removal that could alter the landscape characteristics along portions of San Miguelito Road.
- **VIS-8: Nighttime Lighting.** The Project would result in nighttime light impacts.
- **BIO-2a: Construction Impacts to Woodland and Forest.** Oak woodland and tanoak forest could be impacted during construction.
- **BIO-10: Avian and Bat Collisions with WTGs.** Unknown numbers of special status and non-sensitive birds and bats could be at risk of dying through collisions with the WTGs over the duration of the Project.
- **LU-1b: Tree Protection.** The proposed Project is inconsistent with County Plans, Policies, and Development Standards concerning tree removal.

6.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the Project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses
- The project would involve a large commitment of nonrenewable resources
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy)
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project

Significant and irreversible environmental changes were described in Section 6.4 of the LWEP EIR. The proposed Project would have the same significant and irreversible impacts as described in the LWEP EIR, but would also result in additional impacts to oak trees, aesthetics, and County policy consistency.

Oak trees would be removed at several WTG pads, access roads, cut/fill locations, and along the transmission line route and San Miguelito Road during construction of the Project. Mitigation measures identified in Section 4.5, *Biological Resources*, require tree protection and replacement of all trees that are removed. However, oak trees are very slow to regenerate, especially in areas of low annual rainfall, and oak restoration efforts across the state have been challenging. Even with tree protection and replacement, there is a significant temporal habitat loss that would take several decades, and possibly longer, to replace the habitat value and ecological functions that would be lost to SWEP development. Depending on the ultimate success of restoration efforts, pre-Project habitat values may never be fully replaced. Therefore, irreversible loss of mature oak woodlands may result from Project implementation.

6.3 Energy Conservation

In 1975, Assembly Bill 1575 was adopted by the State Legislature, creating the California Energy Commission (CEC) and amending Public Resources Code Section 21100(b)(3) to require EIRs to examine the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In response, the State Resources Agency created Appendix F of the State CEQA Guidelines to provide guidance on completing this determination.

Section 4.7, *Energy*, of this SEIR provides a full discussion of energy use during Project construction and operation. Although it is a renewable energy project, the SWEP would involve the consumption of fossil fuels by trucks and equipment utilized during construction, including the transport of Project components. Operation and maintenance of the Project would require relatively small amounts of

fossil fuel, primarily for the operation and maintenance of the WTGs, associated equipment and Project vehicles.

The impact and mitigation discussion provided in SEIR Section 4.7 meets the requirements set forth in State CEQA Guidelines Appendix F.

6.4 Growth-Inducing Impacts

In accordance with Section 15126.2(d) of the State CEQA Guidelines, a SEIR must “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” In addition, when discussing growth-inducing impacts of a proposed project, “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment” (Section 15126.2(d) of the State CEQA Guidelines). Two issues must be considered when assessing the growth-inducing impacts of a project:

- **Elimination of Obstacles to Population Growth.** The extent to which additional infrastructure capacity or a change in regulatory structure would allow additional development in the County and region.
- **Promotion of Economic Growth.** The extent to which a project can cause increased activity in the local or regional economy. Economic impacts can include direct effects, such as the direction and strategies implemented within the area of a project, and indirect or secondary impacts, such as increased commercial activity needed to serve the population growth forecasts for the project area.

The LWEP EIR addressed each of these potentially growth-inducing issues. Section 6.5 of the LWEP EIR described that the Project would not remove an obstacle to growth, nor would it promote sufficient direct or indirect economic growth to result in substantial growth in County population or employment. Furthermore, the Project would not involve the extension of any utilities or services that might accommodate additional development and growth. While some modifications would be made to San Miguelito Road to accommodate the transport of turbine blades, no lanes would be added to the roadway and the road’s capacity would not change. The proposed road modifications would maintain access for local property owners and continue to provide access to surrounding Agricultural Preserves. As a result, the Project would not contribute to a growth-inducing effect that could potentially threaten the agricultural nature of the site. The reasoning presented in the LWEP EIR remains valid for the proposed SWEP.

6.5 Effects Found Not to Be Significant

As discussed in Section 15121(a) of the State CEQA Guidelines, an EIR is an informational document intended to identify the significant environmental impacts of a project and identify possible ways to minimize these significant impacts. Impacts were analyzed using the significance thresholds identified in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (ETGM), as amended March 2018 (County of Santa Barbara, 2018) and the State CEQA Guidelines Appendix G. Construction and operation of the proposed Project would not result in significant impacts to mineral resources, population and housing, or public services; and no mitigation measures are required for these resources. This section describes the adverse, but less-than-significant impacts (Class III) that would occur to these resources if the Project were implemented.

6.5.1 Mineral Resources

The LWEP EIR addressed possible effects on mineral resources in Section 3.16, *Other Issue Areas*, and concluded that no significant mineral resources impacts would occur. The following discussion describes the potential for impacts to mineral resources to occur as a result of construction and operation of the proposed Project. The ETGM contains no specific thresholds for the assessment of impacts to mineral resources; therefore, impacts have been evaluated based on Appendix G of the State CEQA Guidelines. Impacts would be considered significant if the Project would:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

A number of mineral resources are found near the Project area, including diatomite, oil and gas, limestone, flagstone, and road gravel. Historically, portions of the Project site have been used for mining, but mineral resources are not known to be present in significant quantities on site. As described in Table 2-1 (Comparison of Lompoc Wind Energy Project and SWEP), a maximum of about 181 acres would be permanently disturbed and it is unlikely that the disturbed area would contain significant quantities of mineral resources. The properties located on the primary wind site are zoned for agriculture use and all are under Williamson Act agricultural preserve contracts. The current principal use of the land is cattle grazing.

The proposed Project includes construction of a new 115-kV transmission line approximately 7.3 miles in length and a new switchyard. As shown in Figure 2-4, *Project Transmission Line Route*, a portion of the transmission line would traverse the Celite Corporation's Lompoc facility, where diatomaceous earth mining and processing occurs. However, construction would affect only a limited area and would be well outside of areas of active and planned mining operations. Permanent disturbance from construction of the transmission line would total 12.8 acres, with an additional 1.4 acre of permanent disturbance for the switchyard. This would not result in the loss of production capabilities at the Celite facility.

The Project would not result in the significant loss of availability of a known mineral resource that would be of value to the region or the residents of the state or the significant loss of availability of a locally important mineral resource recovery site delineated in local general plans.

6.5.2 Population and Housing

The LWEP EIR addressed possible effects on population and housing in Section 3.16, *Other Issue Areas*, and concluded that no significant population and housing impacts would occur. The following discussion describes the potential for impacts to population and housing to occur as a result of construction and operation of the proposed Project. The ETGM contains no specific thresholds for the assessment of impacts to population and housing; therefore, impacts have been evaluated based on Appendix G of the State CEQA Guidelines. Impacts would be considered significant if the Project would:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure).

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

As described in Section 2.6.3, *Construction Workforce*, and similar to LWEP, it is anticipated that approximately 80 percent of the required 50 to 100 construction workers (40-80 workers) would reside in the surrounding Lompoc area during construction, as would all of the permanent employees required to operate the facility. According to the U.S. Census, the City of Lompoc has roughly 14,304 housing units, with an estimated 652 vacant units at the time of the survey. Greater Santa Barbara County has approximately 154,574 housing units, with 11,523 vacant units (U.S. Census 2016a, U.S. Census 2016b). The addition of approximately 100 construction workers to either region for approximately 10 months and 5-7 permanent staff during the life of the Project would not constitute a significant increase in population that would necessitate the construction of new housing or displace a significant number of existing housing units. Therefore, the Project would not directly require the construction of new housing or displacement of housing. Growth-inducing impacts are discussed in detail in Section 6.5.

6.5.3 Public Services

The LWEP EIR addressed possible effects on public services (impacts to police protection, schools, and parks) in Section 3.16, *Other Issue Areas*, and concluded that no significant public services impacts would occur. Project impacts to fire protection and emergency services were analyzed in LWEP EIR Section 3.8, *Fire Hazards and Emergency Services*.

The following discussion describes the potential for impacts to public services to occur as a result of construction and operation of the proposed Project. The ETGM contains no specific thresholds for the assessment of impacts to public services; therefore, impacts have been evaluated based on Appendix G of the State CEQA Guidelines. Impacts would be considered significant if the Project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.

Project impacts to fire protection and emergency services are addressed in this SEIR's Section 4.8, *Fire Hazards and Emergency Services*. As discussed in greater detail in Section 6.4, *Growth-inducing Impacts*, the Project would not result in a substantial permanent population and thus would not result in population-based impacts to public services, including police protection, schools, and parks. No new or altered facilities would be required to maintain acceptable service ratios, response times, or other performance objectives. As discussed in Section 4.16, *Recreation*, construction workers may cause a temporary increase in the use of Miguelito County Park during construction. However, this would cease after construction and no new or expanded park facilities would be required.

6.5.4 Other Less-Than-Significant Effects

In addition to the effects found not to be significant described above, the impact analyses in Chapter 4 of this SEIR concluded that additional impacts resulting from Project implementation would not be significant. The less-than-significant impacts identified in Chapter 4 include the following:

- **VIS-2: Views from Miguelito County Park and La Purisima Mission.** Northeastern-most WTGs could be visible to users of La Purisima Mission.
- **VIS-3: Views from State Route 1.** WTGs could be visible from the SR-1 corridor and the Lompoc Valley.
- **VIS-4: Transmission Line Skyline Silhouette.** Placement of the transmission line in the area of SR-1 introduces three new structures that could partially silhouette against the skyline.
- **VIS-5: Transmission Line Visibility.** Construction and operation of the transmission line could be visible from public roadways and residential areas (majority of San Miguelito Road and SR-1).
- **VIS-8: Nighttime Lighting.** The Project could result in nighttime light impacts (Facility Lighting).
- **AG-1: Important Farmland/Williamson Act Contract Lands.** Development of the SWEP and power line installation could result in the temporary and permanent disturbance of farmland.
- **AQ-2: Long-term Operation Emissions.** Operation emissions could result in a considerable net increase of pollutants that would violate air quality standards or contribute substantially to an existing or projected air quality violation.
- **BIO-2b: O&M Impacts to Woodland and Forest.** Oak woodland and tanoak forest could be impacted during Project operations.
- **BIO-12: Avian Displacement from WTGs.** Birds with habitat within 200 feet of WTG towers may be displaced.
- **BIO-13a: Indirect Construction Effects (Wildlife).** Indirect impacts to wildlife could occur during construction from a variety of sources, resulting in temporary wildlife displacement.
- **BIO-13b: Indirect O&M Effects (Wildlife).** Indirect operational impacts could occur to terrestrial wildlife compared to pre-Project levels.
- **CULT-4: Impacts on Traditional Cultural Properties.** Construction of WTGs could adversely affect Native cultural practices at known Traditional Cultural Properties (Sacred Sites).
- **EEU-1: Federal and State Renewable Energy Goals.** The Project could be consistent with federal goals and state legislation related to the use of renewable energy (Beneficial Impact).
- **EEU-2: Nonrenewable Energy Resources.** Construction and operation of the Project could result in consumption of diesel fuel and gasoline.
- **EEU-3: New/Altered PG&E Facilities.** Impacts from temporary and long-term modifications to the PG&E system to implement the Project could occur.
- **FPES-4: Emergency Services Response Times.** The Project could temporarily increase the need for emergency medical services during construction.

- **FPE-6: Emergency Evacuation/Response.** The closure of Sudden Road and Upper Miguelito Canyon Road could hinder emergency response.
- **GEO-1: Fault Rupture.** There could be a risk of damage to structures by fault rupture.
- **GEO-6: Sewage Effluent Disposal.** Soils could be found incapable for use of septic or alternative wastewater disposal.
- **GHG-1: Reduction in GHG Emissions.** The Project would result in GHG emissions reductions in the power generation sector, resulting in a beneficial effect related to greenhouse gas emissions.
- **RISK-1: Tower Failure and Blade Throw.** There could be a risk to the public from possible WTG tower collapse or blade throw.
- **RISK-2: Blade Icing and Ice Throw.** Risk to the public could occur from blade icing and ice throw.
- **RISK-3: Electromagnetic Field Effect.** Electromagnetic fields could cause a possible hazard when associated with the siting of high-voltage overhead power lines or cables in proximity to residences.
- **RISK-4: Utility/Turbine Interface and Worker Safety.** Construction workers could be exposed to safety risks, including electrical shock and falls. Risk could occur to members of public who incidentally or intentionally enter the Project site.
- **RISK-5: Release of Hazardous Materials.** Accidental spills or leakage of hazardous materials could occur, including fuels (gasoline and diesel), lubricants, motor oil, and paints.
- **RISK-6: Radiofrequency Radiation.** The Project could expose people to radiofrequency radiation (RFR) in excess of the IEEE-ANSI C95.1-1992 standard (No Impact).
- **WAT-1: Erosion and Sedimentation.** Project-related ground disturbance could induce erosion and sedimentation into local watercourses.
- **WAT-2: Pollutant Discharge.** Water quality could be affected by small fuel or oil spills, concrete, and trash and litter during construction and operation.
- **WAT-3: Stormwater Runoff/Flooding.** Temporary and permanent land disturbance could affect stormwater runoff/flooding and stormwater quality.
- **LU-1a: LUDC Visual Impact Development Standards.** The Project poses potential inconsistency with County Plans, Policies, and Development Standards concerning visual impacts.
- **LU-2: FAA Air Navigation Requirements.** Potential conflict with FAA air navigation requirements from installation of WTGs and meteorological towers, and possible use of helicopters during construction.
- **LU-3: Compatibility with VAFB Operations.** Potential incompatibility with VAFB operations, such as radar, telemetry antennas, and microwave links.
- **TC-6: Soil on Roadways.** Project vehicles could track dust and soil onto public roads.
- **USS-2: Water Supply.** The proposed Project could impact water supplies during both construction and operation.
- **USS-3: Wastewater.** The Project's proposed wastewater system could impact groundwater or watercourses on site.

- **USS-4: Public Infrastructure.** The Project could impact public infrastructure in the City of Lompoc.

6.6 References

County of Santa Barbara. 2018. *Environmental Thresholds and Guidelines Manual*. Available at: <
[http://www.sbcountyplanning.org/permitting/ldpp/auth_reg/documents/Environmental%20Thresholds%20October%202008%20\(Amended%20March%202018\).pdf](http://www.sbcountyplanning.org/permitting/ldpp/auth_reg/documents/Environmental%20Thresholds%20October%202008%20(Amended%20March%202018).pdf)>

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