

Addendum

PERMANENT ACCESS ROADS

**ON SOUTHERN CALIFORNIA EDISON'S
APPLICATION FOR**

Antelope Transmission Project, Segments 2 & 3

Application No. A.04-12-008

SCH No. 2006041160

Prepared By:



June 2010

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Appendices – Located at the end of this document

- A – Segment 2 Site Maps
- B – Segment 2 KOP Locations Mapbook
- C – EIR Existing Visual Conditions and Visual Simulations of the Proposed Project (Segment 2)

A. Introduction and Background

The Final Environmental Impact Report (EIR) for the Antelope Transmission Project, Segments 2 & 3 (Project) (Aspen Environmental Group, 2006) was certified and a Certificate of Public Convenience and Necessity (CPCN) was granted by the California Public Utilities Commission (CPUC) (Docket #A.04-12-008, SCH #2006041160) on March 15, 2007. For a history, background and overview of the Project, please see Section A of the First Supplemental Evaluation (March 2009).

Southern California Edison (SCE) has completed final engineering on the approved Project and has begun building portions of the Project. Based on final engineering, additional details of various components of the Project have been further defined. Please see Supplemental Evaluations 1 through 6 for a description and analysis of previous Project modifications. These include the following:

- 1) *Supplemental Evaluation [1] of Project Modifications*, March 2009
- 2) *Supplemental Evaluation 2 for Project Modifications*, April 2009
- 3) *Supplemental Evaluation 3 for Wilderness Transmission Line Modification*, April 2009
- 4) *Supplemental Evaluation 4: Construction of Dead-End Lattice Steel Towers in Segment 3B*, May 2009
- 5) *Supplemental Evaluation 5: Converting Temporary Access Roads 12B and 62 to Permanent Roads in Segment 2*, August 2009
- 6) *Supplemental Evaluation 6: Segment 3A Access and Spur Road Plan Modifications*, September 2009

Additionally, Addendums (January and February 2010) were completed that addressed modifications to the approved Project which involved the following:

- Leaving Access Road (AR) 19 as a permanent access road, in place of the original approved permanent AR 18,
- Improving the existing access road to Construct 34A,
- Leaving AR 69 and 137 as permanent roads, and
- Relocating transposition facilities from Construct 106 to Construct 110
- Relocating transposition facilities from Construct 106 to Construct 105
- Permanent overland travel route and placement of vertical mulch
- Removal of Transposition Structures

This Addendum addresses a modification to the approved Project per communication submitted by SCE to the CPUC on May 25, 2010. This modification is described in detail in Section B, below.

Based on the evaluation of SCE's proposed modification to the approved Project described in Section C below, no new or substantially different impacts have been identified, no changes to impact significance conclusions are needed, and no new mitigation is necessary. Therefore, there is no need for any additional CEQA analysis of the project modification described in Section B, below.

B. Modifications to the Project

Based on final engineering and construction completed to date by SCE on Segments 2 and 3, additional modifications to the Project have been identified. An overview of the roads described in this addendum and their requested classification is shown in Appendix A.

The Final EIR/EIS approved the use of overland travel roads in limited instances where no existing roads were available. Several structures were built through the use of these overland travel routes and will require a modification allowing a portion of these roads (0.76 mile) to remain as permanent access roads in order to maintain access to the structures for O&M.

Additionally, SCE is requesting that 0.05 mile of temporary road bypass that was created within an approved disturbance area near Construct 37 on Segment 2 be designated as a permanent access road. The existing access road enters a low area, which becomes a deep and impassable quagmire during rain events. The nearest alternate route is located on a steep and slippery hill that becomes equally impassable during rain events. This alternative access road will provide SCE with safe access to the 500 kV structures on a year-round basis for O&M.

Construction of the overland travel roads discussed above to a permanent status may require light grading, and involve a 15 foot road base, with a three foot berm on either side, for a total road width of 21 feet. This width is needed in order to accommodate large construction equipment to access each tower location. Roads that are in good standing condition may not require grading and therefore will maintain drive-and-crush with minimal biological impacts. Any new roads not required for ongoing maintenance of the new 500 kV transmission line will be recontoured, restored, and revegetated in accordance with Mitigation Measure report B-1a, (Habitat Restoration and Revegetation Plan, LSA, 2008). The approximate lengths and disturbance areas of these roads are provided in Table 2 below.

Table 2. Segment 2 Proposed Permanent Access Roads and Potential Permanent Impacts

Construct	Road	Length (feet)	Disturbance Area (feet ²)
1	SR01	150	3,150
3	SR02	230	4,830
4	SR03	190	3,990
5	SR04	220	4,620
6	SR05	100	2,100
8	AR02	150	3,150
	AR03		
9	AR05	360	7,560
10	AR05	530	11,130
	SR06		
	AR06		
11	SR07	360	7,560
12	SR09	500	10,500
14	AR08	490	10,290
15	SR12	380	7,980
36	AR28	200	4,200
	AR29		
37	AR30	170	3,570
37	Bypass	280 feet total length	5,880
Total		4,310	90,510

C. Evaluation of Modifications

After review of the Final EIR/EIS, it was determined that the proposed modifications would not result in any new or substantially different environmental impacts, as discussed below. Those environmental issue areas where a potential change in the nature or magnitude of an impact could occur as a result of the proposed modifications are discussed in Section C.1 and are indicated in Table 2 below. Those issue areas for which it was determined that no change in impacts would occur as a result of the proposed modifications are discussed in Section C.2.

Table 2 – Environmental Issue Areas Where Potential Change May Occur

<input type="checkbox"/> Agricultural Resources	<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Biological Resources
<input checked="" type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Geology/Soils/Paleontology	<input type="checkbox"/> Hazards and Hazardous Materials
<input checked="" type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use	<input type="checkbox"/> Mineral Resources
<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input checked="" type="checkbox"/> Transportation/Traffic	<input type="checkbox"/> Utilities/Service Systems	<input checked="" type="checkbox"/> Visual Resources

C.1 Issue Areas Where Modifications Result in a Potential Change in Impacts

Air Quality

Leaving 0.76 mile of overland travel routes as permanent access roads and 0.5 mile of temporary bypass roadway as permanent access road would not result in any additional construction activities. As such, no new air quality impacts would result, no impact significance conclusions would change, and no new mitigation is necessary.

Biological Resources

Focused surveys for special status plant and wildlife species were conducted during the appropriate seasons in 2008 prior to the construction of the Segment 2 line (LSA, 2008). The predominant plant communities within the corridor of Segment 2 include Desert Scrub, Non-native Annual Grassland, Native Annual Grassland, Native Bunchgrass Grassland, Montane Scrub (including Chaparral), Buckwheat/Other Scrub, Juniper Woodland/Juniper Scrub, and Mojave Riparian Forest.

Montane Scrub, Juniper Woodland/Juniper Scrub, and Native Bunchgrass Grassland occur mainly in the foothills, while Native and Non-native Annual Grassland are widespread on the floor of the Antelope Valley. Desert Scrub is found primarily at the southern end of the segment near Vincent Substation. Mojave Riparian Forest habitat occurs along Amargosa Creek. Scattered Joshua trees occur in isolated areas near the north end of Segment 2, but there is no Joshua Tree Woodland habitat on the segment.

The Desert Scrub communities are dominated by narrowleaf goldenbush, California buckwheat, fourwing saltbush (*Atriplex canescens*), Mormon tea (*Ephedra viridis*), big sagebrush, chaparral yucca (*Hesperoyucca whipplei*), and rubber rabbitbrush. Desert Scrub is located primarily near the southern end of Segment 2, near Vincent Substation. This area has relatively flat terrain and is at a lower elevation than the nearby Juniper Woodland/Juniper Scrub habitats.

The Buckwheat/Other Scrub communities are dominated by California buckwheat with other common species being purple needlegrass, one-sided bluegrass, narrowleaf goldenbush, rubber rabbitbrush, and California juniper. Scrubs cover the rolling hills across the segment and intersperse with the other woodland, shrubland, and grassland habitats on the segment.

Montane Scrub was defined in the Final EIR/EIS as an inland, montane, transitional community including Chaparral and Sage Scrub. This community was described as occurring in the highest regions of the foothills, above the juniper habitat on dry, rocky slopes. Dominant species include chamise, big-berry manzanita (*Arctostaphylos glauca*), scrub oak, big sagebrush, chaparral yucca, California juniper, and California buckwheat.

On Segment 2, Mojave Riparian Forest habitat is found only along Amargosa Creek. Dominant species in riparian forest include various species of willows (*Salix* spp.), western cottonwood (*Populus fremontii*), and desert olive (*Forestiera pubescens*).

Dominant plant species in the Non-native Annual Grassland include non-native annual plants such as cheatgrass, foxtail barley (*Hordeum murinum*), and redstem stork's bill. This habitat also includes native plants such as California poppy, lupine species, and small fescue (*Vulpia microstachys*). On Segment 2, Non-native Annual Grassland and Native Annual Grassland habitats are interspersed and primarily found at the north end of the segment near Antelope Substation.

The Native Annual Grasslands are dominated by small fescue and native forbs such as California poppy and other wildflowers. Non-natives such as cheatgrass and redstem stork's bill typically are present.

Native Bunchgrass Grassland habitats are dominated by purple needlegrass, one-sided bluegrass, and/or coast range melic grass (*Melica imperfecta*). Other common species include California buckwheat, scrub oak, big sagebrush, and chaparral yucca. On Segment 2, Native Bunchgrass habitat is found on rolling hillsides across the segment, existing either as a dominant vegetation type or as an understory in shrubland and woodland habitats.

Dominant species in the Juniper Woodland habitat includes California juniper, California buckwheat, chaparral yucca, scrub oak, one-sided bluegrass, giant needlegrass (*Achnatherum coronatum*), and coast range melic grass. On Segment 2, Juniper Woodland/Juniper Scrub is found on the rolling hills at both the northern and southern ends of the segment. This community intersperses with Buckwheat/Other Scrub habitats.

Developed and highly disturbed areas are barren or dominated by ornamental plantings, agricultural crops, or ruderal vegetation.

The results of the surveys (LSA, 2008) included positive findings for the following:

- one special-status plant species, Peirson's morning glory (*Calystegia peirsonii*), a CNPS list 4.2 species,
- one special-status reptile species, coast horned lizard (*Phrynosoma coronatum*), a CDFG Special Animal,

- one potential special-status mammal species, San Diego desert woodrat (*Neotoma lepida intermedia*), a California Species of Special Concern (CSC), or big-eared woodrat (*N. macrotis*), and
- American badger (*Taxidea taxus*), a CDFG Special Animal.

Clearance surveys were conducted within seven days prior to ground disturbing activities at each of the overland travel route locations, and any new sensitive resources were flagged and mapped. No impacts to biological resources will result through the proposed modifications.

Cultural Resources

The proposed permanent access routes in Segment 2 were investigated for cultural and paleontological resources by Cogstone Resources Management (Scott and Gust, 2008), Pacific Legacy (O'Neil et al, 2008) and ECORP Consulting (Ahmet et al, 2006). As no new ground disturbing activities are proposed, no impacts to cultural resources are anticipated. No impact significance conclusions would change and no new mitigation is necessary.

Geology, Soils, and Paleontology

Reclassifying the overland travel routes and the temporary bypass roadway from temporary to permanent access roads would not result in any additional construction activities. No new geology, soils, and paleontology impacts would result, no impact significance conclusions would change, and no new mitigation is necessary.

Hydrology and Water Quality

Surface water runoff as a result of the conversion of the overland travel routes and the temporary bypass roadway from temporary to permanent access roads would slightly increase (greater impermeable surface area); however, as discussed in Final EIR/EIS Section C.8 (Hydrology and Water Quality, Impact H-5), potential impacts from spur roads and access roads would be localized and temporary and the Stormwater Pollution Prevention Plan (SWPPP) required by APMs HYD-2 and HYD-3 would include an erosion control plan to minimize any potential increase in surface water runoff resulting from new or improved roads. Hydrology and water quality impacts would be the same as the approved Project.

Noise

The conversion of overland travel routes and the temporary bypass roadway from temporary to permanent access roads would not result in any additional construction activities. The overall impacts to noise would not differ from the approved Project.

Transportation and Traffic

The conversion of overland travel routes and the temporary bypass roadway from temporary to permanent access roads would not result in a change in traffic and transportation impacts compared to the approved Project, as these roads would be utilized strictly for operations and maintenance. No new traffic or transportation impacts would result, no impact significance conclusions would change, and no new mitigation is necessary.

Visual Resources

Mitigation Measure V-1b (*Construct, Operate, and Maintain with Existing Access/Spur Roads*) states that, "In locations designated by the CPUC, SCE shall construct the new transmission line using existing access roads and spur roads. SCE shall consult with the visual specialist designated by the CPUC to ensure that the objectives of this measure are achieved. SCE and its Contractors shall submit plans and construction drawings for access roads and spur roads, demonstrating compliance with this measure, to the CPUC for review and approval at least 60 days prior to the start of construction." (Final EIR C.11-26)

Plans and drawings (including locations and types of roads) have been submitted as part of the *Access and Spur Roads Plan* (PAR, 2008). Of the 0.82 mile of proposed permanent access roads in Segment 2, 0.45 miles are within the vicinity of KOP 7 and 9. The remaining KOPs within Segment 2 are not affected by the proposed new permanent access roads addressed in this addendum. A map depicting the approximate location of the KOPs in Segment 2 in relation to the ROW corridor and proposed permanent access roads has been provided in Appendix B. Additionally, Appendix C includes figures from the Final EIR/EIS depicting pre-disturbance and simulated post-disturbance photographs from KOP 7 and 9.

The following section of this EIR Addendum will evaluate the KOP and detail the affected new road. Visibility of the proposed permanent road from the KOP will be analyzed via the following resources:

KOP 7: Avenue L Near Olive Grove

"KOP-7 was established on Avenue L near an existing homestead with an olive grove. From Mile S2-0.0 to S2-4.4, the Project would traverse the flat desert plain of Antelope Valley, following multiple existing transmission lines in the Antelope-Vincent Corridor (see Figure C.11-8A – Existing Visual Condition as seen from KOP-7). As seen in Figure C.11-8A, the proposed Project would be constructed west of the existing homestead and olive grove, and would remove the line of wooden 66-kV transmission poles and replace them with 75-foot-tall, light-weight, direct-buried TSPs, 180 feet west of and parallel to the existing alignment of the existing wooden structures farther south of Avenue L. Following this relocation, the Project would construct the proposed 500-kV LSTs in the location of the existing 66-kV transmission poles farther south of Avenue L. Figure C.11-8A is representative of existing conditions seen at foreground and middleground viewing distances from Mile S2-0.0 to Mile S2-4.4." (Final EIR C.11-8)

The proposed permanent access roads to Constructs 8, 9, 10, 11, 12 and 13 fall within the viewshed of KOP 7, however, these roads are in an area already heavily disturbed by existing access roads.

KOP 9: Godde Hill Road

"At approximately Mile S2-6.4, the proposed Project would cross over Godde Hill Road, just downhill on the north side of Godde Pass on Portal Ridge. KOP-9 was established on Godde Hill Road at the center of the existing utility corridor. There is a turnout at this location along the twisting, two-lane paved road. During site investigations, it was noted at several times that people were stopped at the turnout, looking at the five existing transmission lines that cross the road at this location (see Figure C.11-10A – Existing Visual Condition as seen from KOP-9)." (Final EIR C.11-10)

The proposed permanent access roads to Constructs 36 and 37 fall within the viewshed of KOP 9, however, these roads are in an area already heavily disturbed by existing access roads.

While the conversion of portions of the overland travel routes to permanent access roads and temporary bypass roadway to permanent access road would result in a permanent change to the visual environment, these roads would be located within the same roadway network proposed for the approved Project and, therefore, such a minor modification to the roadway network would not result in any new or substantially different impacts on visual resources. No impact significance conclusions would change and no new mitigation is necessary.

C.2 Issue Areas Where Modifications Result in No Change

The conversion of overland travel routes and the temporary bypass roadway from temporary to permanent access roads would occur within existing disturbance areas. Therefore, potential environmental impacts to agricultural resources, hazards and hazardous materials, land use, mineral resources, population and housing, public services, and utilities and service systems are not expected to change or increase in severity from the approved Project.

D. Other CEQA Considerations

D.1 Significant Unavoidable Impacts

The environmental impacts of the approved Project are described in detail in Section C (Environmental Analysis) of the Final EIR/EIS, and for the proposed modifications, in Section C (Evaluation of Modification) of this Addendum. All the significant and unavoidable (Class I) impacts identified for the approved Project, as discussed in Section E.1.2 (Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented) of the Final EIR/EIS, would be the same as for the approved Project with implementation of the proposed modifications.

D.2 Irreversible and Irretrievable Commitment of Resources

The proposed modifications identified by SCE would not involve additional construction activity and would result in the same irretrievable commitment of natural resources as described in the Final EIR/EIS. Please see Section E.1.3 of the Final EIR/EIS for a complete discussion of irreversible and irretrievable commitment of resources for the approved Project.

D.3 Growth-Inducing Effects

The proposed modifications identified by SCE would not involve additional construction activity and would not change the growth-inducing effects described for the approved Project in the Final EIR/EIS. Please see Section E.1.4 of the Final EIR/EIS for a complete discussion of growth-inducing effects for the approved Project.

D.4 Cumulative Impact Analysis

The proposed modifications identified by SCE would not involve additional construction activity and would not change the cumulative impacts described for the approved Project in the Final EIR/EIS. Please see Section C (Cumulative Impact Analysis by Issue Area) of the Final EIR/EIS for a discussion

on the impacts of the Project that could potentially be “cumulatively considerable” or might be able to combine with similar impacts of other identified projects in a substantial way.

E. References

- Ahmet, K., R. D. Mason and S. Bholat. 2006. Cultural Resources Survey Report for Antelope-Pardee 500-kV Transmission Project: Segments 2 & 3. Report on file at the South Central Coastal Information Center, California State University, Fullerton, California, Southern California Edison and California Public Utilities Commission.
- Aspen Environmental Group. 2006. Final Environmental Impact Report (EIR), Antelope Transmission Project, Segment 2 & 3. Report prepared for the California Public Utilities Commission. December 2006. Agoura Hills, California.
- LSA. 2008. Final Preconstruction Biological Survey for the Antelope Transmission Project, Segments 2 in Los Angeles County, California. Report prepared for Southern California Edison. August. Irvine, California.
- O'Neil, Mary M., K. Ross Way and Thomas L. Jackson. 2008. Confidential Report of Supplemental Archaeological Survey and Cultural Resources Management Plan, Tehachapi Renewable Transmission Project, Segment 2, Los Angeles County, California. Report on file with Southern California Edison and California Public Utilities Commission.
- PAR. 2008. Southern California Edison Documentation and Plan for Compliance with the Opinion Granting a Certificate of Public Convenience and Necessity (CPCN) for the Antelope Transmission Project Segment 2 Access and Spur Roads. Report prepared for Southern California Edison. November. Lancaster, California.
- Scott, K. and S. Gust. 2008. Paleontological Resources Management Plan for the Tehachapi Renewable Transmission Project Segments 2 and 3, Los Angeles County, California Including Paleontological Assessment. Report on file with Southern California Edison and CPUC.

PUBLIC UTILITIES COMMISSION

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June 4, 2010

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770

RE: SCE Antelope Transmission Project, Segments 2 – Permanent Access Routes

Dear Mr. Johnson,

On May 25, 2010, Southern Californian Edison (SCE) submitted a request to modify the Antelope Transmission Project, Segment 2, as follows:

Permanent Access Routes. Re-designate 0.76 mile of construction overland travel routes as permanent access roads for future operation and maintenance activities on Segment 2. Improvements to the overland travel roads to serve as permanent routes may require light grading, and involve a 15 foot road base, with a three foot berm on either side, for a total road width of 21 feet. This width is needed in order to accommodate large construction equipment to access each 500 kV tower location.

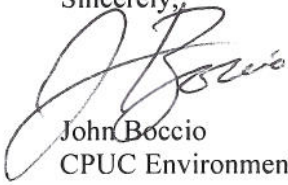
Additionally, SCE is requesting that 0.05 mile of temporary road bypass that was created within an approved disturbance area near Construct 37 on Segment 2 be designated as a permanent access road. The existing access road enters a low area, which becomes a deep and impassable quagmire during rain events. The nearest alternate route is located on a steep and slippery hill that becomes equally impassable during rain events. This requested road bypass will provide SCE with safe access to the 500 kV structures on a year-round basis for operation and maintenance activities.

A Final EIR was prepared and published for the SCE Antelope Transmission Project, Segments 2 & 3, on December 26, 2006. The Final EIR was certified and a CPCN was granted by the CPUC (Docket #A.04-12-008, SCH #2006041160) on March 15, 2007. Since that time, SCE has completed final engineering on the approved Project and has completed construction of Segment 2. As presented in a letter to the CPUC from SCE dated May 25, 2010, requesting the subject change, the request for permanent access routes is to facilitate future operation and maintenance activities. An Addendum was prepared to assess the environmental impacts associated with the subject modifications. No new impacts or increase in impact severity were identified.

This request is approved by CPUC for the proposed modifications subject to the conditions noted below which shall be met by SCE and its contractors:

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during relevant construction and operation/maintenance activities.
- Copies of all relevant permits, compliance plans, and this approval shall be available on site for the duration of construction activities.

Sincerely,

A handwritten signature in black ink, appearing to read "John Boccio", written over the printed name.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen