

# **Addendum**

PERMANENT OVERLAND TRAVEL ROUTE

AND

PLACEMENT OF VERTICAL MULCH

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

**Antelope Transmission Project, Segments 2 & 3**

Application No. A.04-12-008

SCH No. 2006041160

Prepared By:



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A – Site Map

B – Biological Survey Report

## 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

This Addendum addresses modifications to the approved Project per communication submitted by SCE to the CPUC on March 17, 2010. These modifications are described in detail in Section B, below.

Based on the evaluation of SCE's proposed modifications 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 modifications 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. These modifications involve:

- Leaving the temporary overland travel route to Construct 43 as a permanent route for emergency repairs and Operations and Maintenance (O&M) of the 500 kV transmission line,
- Capping a portion of the proposed permanent route to Construct 43 to prevent impacts to the Bean Springs Archaeological Site Complex, and
- Adding vertical mulch to minimize illegal off-highway vehicle (OHV) activity within the Bean Springs Archaeological Site Complex.

### Permanent Overland Travel Route

Southern California Edison (SCE) requests to leave the approximately 0.82 mile long temporary overland travel route to Construct 43 as permanent (Appendix A). The requested permanent access route to Construct 43 in Segment 3A is needed for emergency access and O&M of the new 500 kV transmission line. Approximately 0.31 mile of this road is an existing road that required no improvements during construction. To prevent impacts to the Bean Springs Archaeological Site complex during permanent use of the route, SCE is requesting to cap a portion of the route for approximately 0.51 mile (Appendix A).

### Placement of Vertical Mulch

SCE also recommends adding cut vegetation (vertical mulch) to reduce illegal OHV activity within the Bean Springs Archaeological Site Complex. The Barstow Bureau of Land Management (BLM) Office has defined vertical mulching as a technique involving “the placement of structure within the confines of the closed roadway surface, both on the ground surface and in a vertical manner, designed to conform with adjacent vegetation and terrain” (BLM, May 2000). This technique uses live and dead vegetation salvaged from regional land clearing operations as “structure” to restore unauthorized routes. Vertical mulching techniques that extend to the visual horizon are successful in blending the route into the landscape. The process of vertical mulching aids in resource preservation/restoration and limits habitat fragmentation. Illegal OHV activity may cause serious, if not permanent, damage to sensitive environmental resources within Bean Springs.

Vertical mulching is a technique employed by the BLM and Forest Service to help minimize the use of unauthorized roads. Within Segment 1, Section 2 (Angeles National Forest), vertical mulching is used to discourage OHV activity from using SR-73 near Artesian Springs. The proposed procedure for vertical mulching activities within Bean Springs is listed below:

- Vegetation Source
  - Cut live/dead vegetation will not be collected onsite. Salvaged vegetative material will be gathered from regionally local SCE clearing or grubbing sites.

- Species lists will be taken from the collection and Bean Springs sites to ensure that no new non-native species will be introduced.

- **Dispersal Procedure**

- Cut vegetation will be uniformly dispersed along the entrance off the overland travel route to the unauthorized OHV road visible from Construct 3A-44.
- Cut vegetation may be dispersed by hand or mechanically, depending on access from established disturbance areas.
- Vehicles will not be permitted off approved project routes.
- If mechanical equipment is used to access the site from the proposed permanent route, vehicles must be equipped with rubber tires.
- Cut vegetation must be located outside of SCE roads and tower pads to maintain future access for maintenance activities.

The vertical mulching procedure has been submitted to the California Department of Fish and Game, and they have concurred with the methodology and monitoring levels.

## 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 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 type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input 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

Air quality impacts as a result of the proposed modifications would be similar to the impacts described in the Final EIR/EIS. No new air quality impacts would result, no impact significance conclusions would change, and no new mitigation is necessary.



## Biological Resources

On March 9, 2010 a preconstruction biological survey (Appendix B) for the overland travel route to Construct 43 and the surrounding area was conducted by biologist Russell Kokx with ECORP. The survey area encompassed the overland travel route to Construct 43 area plus a 500-foot buffer around the perimeter and was surveyed for biological resources. All burrows within the survey area were examined to determine if they were suitable for potential use by burrowing owl or American badger. Surveys for nesting birds covered under the Migratory Bird Treaty Act were conducted in the adjacent trees and towers in and around the proposed site. In addition, the presence of Joshua trees and juniper trees within the survey area was surveyed for mitigation as required by the EIR/EIS (Mitigation Measure B-4). Weather conditions during the surveys were cloudy and cold, with heavy winds around 25 miles per hour and around 45 degrees Fahrenheit. Weather conditions were not ideal for floral and faunal observations.

Joshua trees and juniper trees are located within the project area, however neither species are expected to be impacted during the construction activities. No other special-status plant species were observed during the most recent biological survey, but the survey period was not optimal for botanical surveys. Two small populations of Mojave spineflower (*Chorizanthe spinosa*) were discovered in the project area; one is located 75 feet north of the access road and the other 20 feet southwest of the Construct 43 disturbance area. Neither of these populations will likely be affected by the proposed activities. The Mojave spineflower, CNPS LIST 4, was rejected from analysis within the EIR/EIS due to its regional abundance. While this species is not state or federally protected, the populations will be flagged for avoidance.

During this most recent biological survey, no special status wildlife species were found. Common wildlife species observed included Side-blotched lizard (*Uta stansburiana*), common raven (*Corvus corax*), sage sparrow (*Amphispiza belli*), American kestrel (*Falco sparverius*), turkey vulture (*Cathartes aura*), horned lark (*Eremophila alpestris*) and white-crowned sparrow (*Zonotrichia leucophrys*). Mammal species observed included tracks and scat from coyote (*Canis latrans*), black-tailed hare (*Lepus californicus*) and burrows from various rodent species including northern deer mouse (*Peromyscus maniculatus*), Kangaroo rat (*Dipodomys* sp.) and a visual observation of a white-tailed antelope squirrel (*Ammospermophilus leucurus*). Although no California desert tortoise or desert tortoise sign (i.e., burrows, scat, tracks, shells) was detected within the survey area corridor or the ZOI during protocol-level surveys in 2008, three California desert tortoises were discovered in the northern area of the transmission line in 2009. The closest California desert tortoise was discovered approximately eight miles north of Construct 43.

A biological monitor will be present for the road capping and vertical mulch installation activities within the project area to help minimize impacts to biological resources. In addition, biological monitors will be on site to escort large vehicles to reduce the risk of impacting a desert tortoise. On a regular basis a biological monitor will also conduct nest surveys at the project area.

No impact significance conclusions would change and no new mitigation is necessary.

## Cultural Resources

The Bean Springs Archaeological Site Complex was evaluated and found eligible for the National Register of Historic Places and the California Register of Historical Resources in November 2008.

Data Recovery efforts were conducted within the Area of Direct Impact (ADI), including the overland travel route, in April 2009. The data recovery report was submitted to the CPUC and approved in June 2009.

Permanent use of the overland travel route could impact the Bean Springs archaeological site complex. To prevent impacts during permanent use of the route, SCE recommends capping the route to Construct 43 with heavy weave, nylon geotech cloth overlaid with a minimum of six inches grade 2 road base. A cultural resources monitor will be required during all capping activities. As grading of the route could impact the cultural resource, no grading will be permitted during capping activities.

No impact significance conclusions would change and no new mitigation is necessary.

### Hydrology and Water Quality

Surface water runoff as a result of the new permanent overland travel route would slightly increase (greater impermeable surface area); however, as discussed in Final EIR/EIS Section C.7 (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 APM HYD-1 would include an erosion control plan to minimize any potential increase in surface water runoff resulting from new or improved roads. Therefore, hydrology and water quality impacts would be the same as the approved Project.

### 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 Road Plan (PAR 2008). The proposed permanent access road to Construct 43 in Segment 3A is not within the vicinity of Key Observation Positions (KOP) or their established viewsheds.

No impact significance conclusions would change and no new mitigation is necessary.

## C.2 Issue Areas Where Modifications Result in No Change

The proposed modifications to the Project would occur within existing disturbance areas and not outside of the proposed project area analyzed in the EIR/EIS. Therefore, potential environmental impacts to agricultural resources, geology, soils and paleontology, hazards or hazardous materials, land use, mineral resources, noise, population and housing, public services, traffic and transportation, 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**

Construction of the proposed modifications identified by SCE 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**

Construction and operation of the proposed modifications identified by SCE 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**

Construction and operation of the proposed modifications identified by SCE 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**

- 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.
- Egan, Thomas B. Restoration of Unauthorized Routes in Sensitive Species Habitats. Resource Notes No. 16. Bureau of Land Management. Barstow, California, May 2000.
- PAR. *Access and Spur Roads Plan*. Report prepared for Southern California Edison's Antelope Transmission Project Segment 3A. Lancaster, California, November 2008.