

# **APPENDIX I**

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## **Falcon Ridge Substation Project Intex Alternative**

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# memorandum

date May 17, 2013  
to John Boccio  
from Janna Scott and Al Kostalas  
subject Falcon Ridge Substation Project Intex Alternative

## Introduction

This memorandum provides additional analysis about proposed alternatives to the Falcon Ridge Substation Project, proposed by Southern California Edison (SCE) and located in the cities of Fontana, Rialto, Rancho Cucamonga, and unincorporated San Bernardino County (the "Project").

The Draft EIR for the Project was circulated for agency and public review in January, 2012. Comments received on the Draft EIR proposed a new alternative that had not been analyzed in the Draft EIR. SCE was invited to provide input on the reasonableness and feasibility of the proposal. The Final EIR, which was published in October, 2012, documented the analysis of potential impacts of the new alternative (called the "Flood Control District ROW Alternative," or "FCD ROW Alternative") on all resource areas, and found the new alternative to be environmentally superior not only to the Project as proposed, but also to the alternative that the Draft EIR had identified as environmentally superior.

After the Final EIR was published and before the Commission considered the Final EIR for certification, SCE provided additional input regarding the feasibility of the FCD ROW Alternative and proposed a variation of it for the Commission's consideration. This memorandum summarizes SCE's additional input on the FCD ROW Alternative, describes the proposed variation (called the "Intex Alternative"), and provides additional environmental analysis. As explained below, the Intex Alternative is environmentally superior to the Project.

## Subsequent Inquiry Reveals the FCD ROW Alternative to be Infeasible

SCE has concluded, based on subsequent inquiry, that the FCD ROW Alternative is infeasible for technical reasons. After reviewing their submittal, we agree. As described in Final EIR Section 2.5.2, the FCD ROW Alternative proposed to place a portion of the Etiwanda Subtransmission Source Line within a 30-foot ROW consisting of a 20-foot ROW on San Bernardino County Flood Control District (SBFCD) property and a 10-foot ROW on land within the Westgate Specific Plan area of Fontana that is owned by Intex Properties. That alternative would have the 66 kV subtransmission line continue within the existing 500 kV ROW until it reaches a ROW owned and maintained by the SBFCD for flood control purposes (the "SBFCD ROW"). From there, the

FCD ROW Alternative would continue eastward, parallel to and within the SBFCFCD ROW to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing Interstate-210 (I-210) perpendicularly. In so doing, the FCD ROW Alternative would cross the back of the Intex property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use as part of the West Gate Specific Plan. The FCD ROW Alternative otherwise would be the same as the Project described in Draft EIR Chapter 2.

SCE contends that construction of the FCD ROW Alternative would not be technically feasible because the area between the SBFCFCD access road and the property line fence varies in width between approximately 9 and 14 feet and is subject to a side slope that varies in elevation between approximately 4 and 6 feet. Consequently, increased pole setting depths would be required. Additionally, the SBFCFCD access road is approximately 20 feet wide and is made of asphalt paving (the north edge of the road is bound by the top of the southerly concrete flood channel wall, and the southerly edge is bound by the top of the slope). The trucks and equipment used to construct and maintain the 66 kV underground and overhead source lines can weigh in excess of 57,000 pounds and have an outrigger spread of 15 to 25 feet. SCE explains that this equipment, with outriggers extended, would damage the asphalt road at the top of the slope. The methods of installing the underground duct structures, bolted-base steel pole foundations, and pole holes for the tangent line poles on the side slope could undermine the SBFCFCD access road, and this could cause the boom trucks used for line construction to lose footing and roll over. The FCD ROW Alternative as described also would require temporary removal of the flood control fence and extensive ground disturbance because all excavation and construction of underground duct structures, tubular steel pole (TSP) foundations, and pole holes, as well as job site pole deliveries, would need to be done from the Intex property. Once the Intex property is fully developed, any future major maintenance on the 66 kV source line (such as pole replacements) would be nearly impossible due to restricted access and lack of room for equipment. To avoid these technical issues, SCE met with SBFCFCD and Intex to discuss the feasibility of placing the 66 kV subtransmission line entirely on Intex's property, and now proposes an alternative that does so.

### **Proposed New Alternative: The Intex Alternative**

The Intex Alternative proposed by SCE (and resulting from discussions with the SBFCFCD and Intex) would have a similar alignment to the FCD ROW Alternative, but the ROW would be located entirely on Intex property, rather than on a combination of Intex and SBFCFCD property. Thus, the alignment would be positioned approximately 20 feet south of the FCD ROW Alternative, and would not be located within or utilize the SBFCFCD ROW. SCE would not need to obtain easement rights from the SBFCFCD. Based on its discussions with Intex and SBFCFCD, SCE states that both support the Intex Alternative.

This analysis relies on the following sources of information about the Intex Alternative:

- SCE, 2012. E-mail communication from Thomas Diaz, "Falcon Ridge - New Intex Alternative." December 21.
- SCE, 2013a. E-mail communication from Thomas Diaz, "Re: FW: A.10-12-017\_Falcon Ridge PTC SCE's Response to Data Request set A10-12-017 Falcon Ridge-ED-013 Q.01 & Q.02." February 28.
- SCE, 2013b. Email communication from Thomas Diaz, "Falcon Ridge – Intex." April 24.

**The Intex Alternative would be shorter than the Applicant-proposed route.** The total length of the Intex Alternative would be 2,590 feet, compared to 2,900 feet for the corresponding portion of the proposed route.

Under the Intex Alternative, the 66 kV Etiwanda Subtransmission Source Line would not exit the existing 500 kV transmission line ROW at Highland Avenue, as for the Applicant-proposed route, but would continue within the 500 kV ROW for an additional approximately 700 feet, then turn east, exiting the ROW just south of the existing SBFCD ROW. After exiting the transmission line ROW, the Intex Alternative would be constructed within a vacant portion of the Intex property bordering the southern boundary of the SBFCD ROW, adjacent to the chain link fence that separates the Intex and SBFCD properties. The subtransmission source line would be placed underground for approximately 384 feet to maintain clearance with the existing 500 kV transmission line. It then would rise to an overhead position and continue east parallel to the SBFCD ROW for approximately 1,500 feet to San Sevaine Road. The Intex Alternative would rejoin the Applicant-proposed route at San Sevaine Road to cross I-210 to the north.

**The Intex Alternative would require two fewer subtransmission line poles than the Applicant-proposed route.** The Alternative Route would require two more TSPs and four fewer light weight steel (LWS) poles than the Applicant-proposed route, for a total of 13 new poles compared to the Project's initial proposal to install approximately 15 new poles in this area. Specifications for TSPs and LWS poles are shown in Figure 2-5 of the Draft EIR. Although the specific locations of new subtransmission poles cannot be determined until final engineering occurs, the total number and types of poles can be estimated based on the length and alignment of the route. The Intex Alternative would require one TSP where the subtransmission line turns east and transitions underground beneath the 500 kV transmission line, at the point where it exits the existing 500 kV transmission line ROW and enters Intex property. A second TSP would be located approximately 384 feet east as the line transitions from underground to overhead. A third TSP would be required just south of I-210 in order to span the freeway to the north. The remaining three would be placed as determined needed and appropriate during final engineering. Approximately seven LWS poles would be required for this route: three along the segment extending northeast from South Highland Avenue, and four on the overhead portion extending along the northern boundary of the Intex property to San Sevaine Road.

**The Intex Alternative would require less disturbance (temporary and permanent) than the proposed route.** As described in Draft EIR Section 2.6.3 (p. 2-12), the estimated land disturbance for construction of new poles is up to 200 feet by 100 feet per TSP and up to 150 feet by 75 feet per LWS pole. However, disturbance would be limited to within the 30-foot-wide ROW; therefore, it is assumed that the smaller dimension for each of these disturbance areas would be 30 feet for the Intex Alternative. This would result in 6,000 square feet of disturbance per TSP and 4,500 square feet per LWS. Areas temporarily disturbed during construction would be restored to within 25 feet of a TSP foundation or 10 feet of a LWS pole, resulting in approximately 1,740 square feet or 0.04 acre of permanent disturbance per TSP<sup>1</sup> and 416 square feet or 0.01 acre of permanent disturbance per LWS pole. Based on these estimates, installation of new poles would result in approximately 13,352 square feet, or 0.3 acres, of permanent ground disturbance. Additionally, approximately 384 feet of this alternative route would be placed in a new underground duct bank. The trench for the duct bank would be approximately 20 inches wide, and a 15-foot laydown and clearance width also would be required, resulting in 5,760 square feet of disturbance. Because this area would be restored after installation, no permanent disturbance would result. Table 1 summarizes this estimated land disturbance.

<sup>1</sup> Because the area of disturbance for a TSP would be limited to the width of the ROW, this is estimated by assuming that permanent disturbance would be within a rectangle of 30 feet in width (the ROW width) by 58 feet in length (8-foot diameter TSP concrete foundation and 25 feet of disturbance in either direction).

**TABLE 1**  
**ESTIMATED LAND DISTURBANCE OF INTEX ALTERNATIVE AND APPLICANT-PROPOSED ROUTE**

Intex Alternative Feature	Quantity	Disturbed Area Calculation (L x W)	Area Disturbed During Construction (square feet)	Disturbance Accounted for under New Access Road	Adjusted Temporary Disturbance	Area to be Restored (square feet)	Area Permanently Disturbed (square feet)
Install New 66 kV TSP <sup>1</sup>	6	200' x 100'	120,000	(21,600)	98,400	87,960	10,440
Install New 66 kV LWS Pole <sup>1</sup>	7	150' x 75'	78,750	(18,900)	59,850	56,938	2,912
Install New 66 kV Duct Bank	384	linear feet x 15' wide	5,760	N/A	N/A	5,760	0
New Access Road	2,590	linear feet x 18' wide	46,620	N/A	N/A	0	46,620
<b>Total</b>			<b>251,130 (5.8 acres)</b>	<b>(40,500) (0.9 acre)</b>	<b>210,630 4.8 acres</b>	<b>150,658 (3.45 acres)</b>	<b>59,972 (1.4 acres)</b>
<b>Applicant-Proposed Route Total</b>			<b>5.7 acres</b>		<b>5.7 acres</b>	<b>4.3 acres</b>	<b>1.4 acres</b>

<sup>1</sup> Includes foundation installation, structure assembly and erection, conductor & OHGW installation. Area to be restored after construction: Portion of ROW within 25 feet of a TSP or 10 feet of a LWS or wood pole to remain cleared of vegetation and would be permanently disturbed (approximately 0.04 acres per TSP and 0.01 acres per LWS).

SOURCES: SCE, 2013a; SCE, 2013b

The total land disturbance would be approximately half that of the corresponding portion of the Project due to its shorter overall length as well as the narrower width of the ROW. However, its total permanent disturbance would be approximately the same because it would require more TSPs and a slightly longer access road, which are the features resulting in the greatest amount of permanent disturbance.

**The Alternative Route would require more road construction and maintenance than the Applicant-proposed route.** As shown in Table 1, the Intex Alternative would require the construction and maintenance of approximately 2,590 feet of new access roads – the entire length of the alignment. This is slightly longer than the Project's 2,500 feet of new access roads along this portion, because for the Intex Alternative, new access roads would be required within the existing 500 kV ROW as well as through the Intex property before reaching San Sevaine Road. The new access road would be substantially similar to other proposed access roads along the subtransmission corridor. The road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side. The gradient would be leveled so that any sustained grade does not exceed 14 percent.

**The Intex Alternative would require new easement rights to be obtained.** New easement rights would be required to construct the Intex Alternative that would not be required for the Applicant-proposed route. The property owner of that portion of the route (Intex) has offered to grant SCE a 30-foot easement to facilitate the construction and operation of an alternative 66 kV subtransmission line alignment. Intex's proposed easement would parallel the SBFCROW from the existing SCE transmission ROW until the terminus of the SBFCROW, where it curves slightly to the north and proceeds along the property boundary to San Sevaine Road. The Intex Alternative would not require the Applicant to obtain easement rights from SBFCROW.

The Intex Alternative would result in somewhat reduced environmental impacts relative to the Project. Based on discussions with SBFCROW and Caltrans, and Intex's offer to grant SCE an easement for purposes of developing an alternative to the Applicant-proposed route, development of the Intex Alternative also could be feasible.

Accordingly, the CPUC has evaluated the potential direct, indirect, and cumulative effects of the Intex Alternative on a resource-by-resource basis and has documented its conclusions below. For the same reasons summarized in Final EIR Section 2.5.2(D) for the FCD ROW Alternative, CEQA does not require circulation of the Intex Alternative for separate agency and public review.

## **Analysis of Potential Impacts Created by the FCD ROW Alternative**

### ***Aesthetics***

As described above, the Intex Alternative alignment would be the same as the Project described in Draft EIR Chapter 2, with the exception of the portion of the Etiwanda Subtransmission Source Line Route in the vicinity of South Highland Avenue and San Sevaine Road. Therefore, impacts from the construction, operation, and maintenance of the Intex Alternative would be the same as the Project; adverse visual impacts to scenic vistas would be less than significant or less than significant with mitigation for Baseline, Beech, Cherry, Citrus, Etiwanda, Sierra, and Wilson avenues; Foothill Boulevard; and I-15. The Intex Alternative would not be located in the vicinity of any state-designated or eligible scenic highways in the study area (no impact), would not substantially degrade the existing visual character or quality of the site and its surroundings (less than significant), nor would this Alternative introduce new sources of substantial light or glare that would adversely affect day or nighttime views in the area (less than significant).

Compared to the Project, the Intex Alternative would result in reduced impacts to viewers on South Highland Avenue, a roadway with moderate to high visual sensitivity that provides views of scenic vistas to the north. While the Project would result in significant and unavoidable impacts to viewers on South Highland Avenue, this Alternative would not be located along South Highland Avenue: instead, it would cross South Highland Avenue to extend northeast within the existing 500 kV ROW until just south of the SBFCD ROW. As described above, from there, the Intex Alternative would continue eastward to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing I-210. In so doing, the Intex Alternative would be located on property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use. To viewers on South Highland Avenue, the Intex Alternative would appear to the north, against a backdrop of open space and I-210 in the foreground, and distant mountains in the background. Motorists would pass under the subtransmission line as it crossed the roadway in existing SCE ROW. The addition of new subtransmission poles and conductor would cause a perceptible increase in structure prominence and industrial character within the landscape. However, motorists already traverse SCE ROW east of the Cherry Avenue, and for the portion of the alternative that parallels South Highland Avenue, the increased distance between the viewer and the subtransmission line would be enough that these components would not demand attention, and would be co-dominant with other features in the viewshed including existing utility infrastructure and mountains in the background. Visual contrast would be low to moderate. The new features would not block views of the San Bernardino and San Gabriel Mountains in the background to the north, and the overall visual change would be low to moderate. Per Draft EIR Table 4.1-2, given South Highland Avenue's moderate to high visual sensitivity, the resulting visual impact would be adverse but not significant.

Compared to the Project, the Intex Alternative would result in minor increased impacts to viewers on I-210, a roadway with high visual sensitivity that provides views of scenic vistas to the north; the portion of the Alternative in the Intex property would be located closer to I-210 than the commensurate portion of the Project, by approximately 0.1 mile. However, the Alternative alignment would be located to the south of I-210, and therefore would not impact scenic views of the San Bernardino and San Gabriel Mountains to the north. This

alternative would traverse I-210 at the same location as the Project. For viewers looking north towards the mountains (i.e., the scenic views), the visual change would be experienced only very briefly, while approaching and crossing under the subtransmission source line. Like the Project, under this Alternative, actual impacts at this KOP would be adverse but less than significant.

### ***Agriculture and Forestry Resources***

The Intex Route would be located on land that is designated as Unique Farmland, and would result in some permanent conversion of Unique Farmland to nonagricultural use. However, the Intex Alternative would cause less of an impact on Unique Farmland than the Applicant-proposed route because only 4,453 feet of source line would be located on land bearing this designation as compared to 4,785 feet of source line for the proposed Project. Similar to the Project and the FCD ROW Alternative, this farmland conversion previously was analyzed in the City of Fontana General Plan Update EIR, which concluded that the conversion was a significant and unavoidable impact, and so required the adoption of a Statement of Overriding Considerations for the loss of agricultural land. The Intex Alternative alignment is not zoned for agricultural use, nor is it subject to a Williamson Act contract. It is not located on land zoned as forest land or timberland. Therefore, construction, operation, and maintenance of the Intex Alternative would result in the same impact conclusions as the Project (see Draft EIR Section 4.2, Agriculture and Forestry Resources) for significance criteria a) through e), but would have a decreased impact related to the conversion of Unique Farmland to non-agricultural use.

### ***Air Quality***

Construction of the Intex Alternative would not require additional construction equipment beyond that already included in the air quality analysis (see Draft EIR Appendix C); consequently, there would be no new or different criteria air pollutants or toxic air contaminants emitted during the construction of the Intex Alternative than already were analyzed in the Draft EIR. Although construction of the Intex Alternative would result in more trenching for underground duct bank and a slightly longer access road, it would result in a somewhat shorter subtransmission source line with fewer new poles and would require slightly more total ground disturbance compared to the Applicant-proposed route. Therefore, the Intex Alternative would result in slightly lower annual emissions compared to the Applicant-proposed route. However, on a daily basis the construction emissions associated with the Intex Alternative would be expected to be similar to those identified in Draft EIR Table 4.3-6 for the Project. Therefore, although the impact conclusions relating to regional air quality associated with NO<sub>x</sub> and PM<sub>10</sub> would remain the same as the Project (i.e., temporarily significant and unavoidable), implementation of the Intex Alternative would cause a slightly reduced impact relative to the Project.

Implementation of the Intex Alternative would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaire Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional dilution of construction equipment diesel exhaust emissions at the condominium complex. Therefore, the air quality and odor-related impacts on sensitive receptors under the Intex Alternative would be slightly reduced compared to the Project, although the impact conclusions would be the same (i.e., less than significant).

Finally, operations associated with the Intex Alternative would not result in the release of any air emissions, and any vehicle trips required for periodic maintenance would be indistinguishable from the infrequent trips that would be required for maintenance of the Applicant-proposed route. Therefore, operations and maintenance-

related impacts associated with the Intex Alternative would be the same as the Project's impacts in these respects (i.e., less than significant).

### ***Biological Resources***

The Intex Alternative would traverse disturbed habitat that is similar to the comparable portions of the Applicant-proposed route. The Intex Alternative is within the ruderal (disturbed) fringe surrounding vineyard lands, and appears to support several small, remnant stands of undisturbed grassland habitat, though no evidence of Riversidean sage scrub, a CDFW-sensitive vegetation community, is noted in the alignment. Habitat types in the alignment appear to include ruderal habitat, disturbed annual grassland, vineyard, and disturbed habitat. It is noteworthy that the defunct vineyard located adjacent to the Intex Alternative is gradually being recolonized by non-native grasses and native herbaceous species.

CEQA Guidelines biological resource-related significance criterion a) relates to potential impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Portions of the Intex Alternative could potentially support special-status plants or wildlife species; however, given the level of disturbance, the overall likelihood is considered low. Focused, USFWS protocol-level biological surveys were performed for the Applicant-proposed route and comparable survey data is not available for the Intex Alternative; therefore, this estimate of potential biological resources that may be encountered on the Intex Alternative would require separate surveys to confirm impact conclusions. The route is within the occupied range of the coast horned lizard, coast patch-nosed snake, burrowing owl, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse. Thus, these species would be presumed present similar to the comparable portion of the Applicant-proposed route. Therefore, Mitigation Measure 4.4-2 identified for the Applicant-proposed route also would be required for the Intex Alternative. In the absence of focused surveys of the Intex Alternative to demonstrate absence of burrowing owl (a California species of special concern) and San Bernardino kangaroo rat (federally listed endangered), it is possible that these species could occur within the alignment. The Applicant-proposed route is not within designated critical habitat for San Bernardino kangaroo rat, which occurs north of I-210. Plummer's mariposa lily and Parry's spineflower were identified in portions of the Intex Alternative (though not near the modified alignment) and in the absence of focused surveys, there is a low likelihood that these or other special-status plant species may occur in the Intex Alternative.

Because protocol-level surveys demonstrated the absence of San Bernardino kangaroo rat in the Applicant-proposed route, additional kangaroo rat surveys were not required to mitigate project impacts. Additional surveys would be required for the Intex Alternative to identify the potential presence or absence of San Bernardino kangaroo rat and special-status plants in the alignment (see Mitigation Measure Intex Alternative-BIO-1 and BIO-2, respectively, below). If the San Bernardino kangaroo rat were identified during surveys, additional protective measures would be required, such as avoiding occupied habitat by siting towers to avoid occupied habitat or using an alternate route such as the Applicant-proposed route. Due to the high degree of existing ground disturbance of habitat within the Intex Alternative and surrounding intensive land uses (I-210 to the north and vineyards to the south), the likelihood of encountering San Bernardino kangaroo rat and/or special-status plants in the alignment is considered low.

Similar to the Applicant-proposed route, the Intex Alternative would have comparable potential impacts to common or protected nesting migratory birds, and similar hazards to raptors as a result of electrocution or

collision. Therefore, APMs identified for the Applicant-proposed route, and Mitigation Measure 4.4-4 identified for the Applicant-proposed route would also be required for the Intex Alternative.

**Mitigation Measure Intex Alternative-BIO-1:** A habitat assessment for San Bernardino kangaroo rat shall be conducted by a qualified biologist within the Intex Alternative if this route is approved. If no potential occupied habitat is found during this assessment, then no further action would be necessary. If potential or occupied habitat is identified, USFWS protocol-level trapping surveys shall be performed. Based on survey findings, two potential outcomes are possible:

- If San Bernardino kangaroo rats are not identified during trapping, no impact would occur and no further action would be required.
- If San Bernardino kangaroo rats are detected during surveys, an alternate alignment could be selected or the route altered to completely avoid all potential or occupied habitat for this species. If complete avoidance is not feasible, minimization measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area, surveying and establishing exclusionary perimeter fencing around such areas, and staging materials and work so as not to encroach into them. The presence of a Biological Monitor during Project construction shall be required to further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFW-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.

**Significance after Mitigation:** Less than Significant.

**Mitigation Measure Intex Alternative-BIO-2:** If the Intex Alternative is selected, portions of the proposed alignment that have not been surveyed to determine the potential presence or absence of special-status plants shall be surveyed following the most recent CDFG rare plant survey protocol (CDFG, 2009). Following surveys, two potential outcomes are possible:

- If special-status plants are not identified during focused surveys, impacts would not be anticipated and no further action would be required.
- If special-status plants are identified during surveys, the implementation of Mitigation Measure 4.4-1 would reduce potential impacts to a less-than-significant level.

**Significance after Mitigation:** Less than Significant.

CEQA Guidelines biological resource-related significance criteria b) and c) relate to potential impacts to riparian habitat, sensitive natural communities, or federally protected wetlands. The Intex Alternative would not impact wetlands, riparian habitat or other sensitive natural community, as they do not occur in the alignment.

CEQA Guidelines biological resource-related significance criterion d) relates to movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or use of native wildlife nursery sites. The Intex Alternative would not interfere with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No such sites occur in the local vicinity of the Intex Alternative, which abuts a freeway and degraded agricultural lands.

CEQA Guidelines biological resource-related significance criterion e) relates to whether a proposed project or alternative would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Intex Alternative would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Following the implementation of protective measures, the construction, operation, and maintenance of the Intex Alternative is expected to result in the same impact conclusions as the Project (see Draft EIR Section 4.4, *Biological Resources*) for significance criteria a) through e). The Intex Alternative traverses disturbed habitat similar to that which occurs on the proposed route and the likelihood of encountering sensitive resources in this alignment, which has not been fully studied for biological resources, is estimated to be low.

### ***Cultural Resources***

The Intex Alternative would result in the construction of approximately 300 fewer feet of subtransmission line and approximately 90 more feet of new access road, but overall it would not substantially change the size, location or type of facilities to be constructed. Therefore, the facts, analysis and significance conclusions presented for the Applicant-proposed route generally hold true for the Intex Alternative, with one exception. Focused cultural resources surveys were performed for the Applicant-proposed route, but comparable survey data is not available for all of the Intex Alternative. Because the Intex Alternative, where it diverges from the Applicant-proposed route, has not been subject to cultural resources survey, the presence or absence of cultural resources within this portion of the Intex Alternative is unknown, and therefore it is possible that there are previously undocumented cultural resources within these unsurveyed areas. However, because Mitigation Measure Alternative 1-CUL-1 would require additional archaeological survey of unsurveyed areas, the potential cultural resource-related impact of the Intex Alternative would be the same as the Project (i.e., less than significant impact with mitigation incorporated).

With respect to paleontological resources, the Intex Alternative would result in similar impacts to paleontological resources as the Project because the two alignments are underlain by the same geologic units.

Potential impacts to cultural resources under this alternative would be similar to the Applicant-proposed route. Mitigation Measures 4.5-1, 4.5-2, 4.5-3, and Alternative 1-CUL-1 also would be required for the Intex Alternative. The significance conclusions in Draft EIR Section 4.5, *Cultural Resources*, with regard to significance criteria a) through d) would be the same for the Intex Alternative as for the Project.

### ***Energy Conservation***

Construction of the Intex Alternative would result in incrementally less energy consumption for construction equipment and construction-related transportation compared to the Applicant-proposed route because of the shorter route resulting in less land disturbance and subtransmission line pole installation. However, the approximately 45 feet more of trenching for the underground portion would result in an incremental increase in energy consumption. As with the Project, the Intex Alternative would not interrupt existing local SCE service and construction-related energy demands are not expected to have a significant adverse effect on energy resources. Like the Project, the Intex Alternative would contribute to meeting projected local peak demand electricity needs and would have no impact on local or regional energy supplies or capacity, nor would it impact electricity generation facilities' ability to provide and maintain existing levels of service during peak and base period

demands. Therefore, the impact conclusions related to the construction, operation, and maintenance of the Intex Alternative would be the same as for the Project in Draft EIR Section 4.6, *Energy Conservation*, with regard to criteria a) through f).

### ***Geology, Soils, and Seismicity***

The Intex Alternative would not substantially change the size or type of facilities to be constructed. The Intex Alternative would be slightly shorter, require slightly more access road construction and maintenance, and result in less overall land disturbance than the Project. Because the Intex Alternative, like the Applicant-proposed route, would cross mostly flat terrain underlain by similar earth materials, it would result in similar potential impacts with respect to seismic ground shaking and/or seismic-related ground failure, soil erosion, unstable geologic units or soils, and expansive soils. While SCE has not yet prepared a geotechnical investigation of the subtransmission source line route, associated facilities, or telecommunications system, one would be prepared if necessary as part of pre-construction activities. Likewise, review of all geotechnical reports and their incorporation into Project plans would occur prior to issuance of a grading or building permit by the agency with jurisdiction over the construction activity. Design recommendations from existing geotechnical reports also would be relevant and applied to the design of the Intex Alternative. For example, for underground sections of the subtransmission source line (e.g., the 384-foot section of the Intex Alternative that would be underground), the trench would be backfilled with a slurry mix that is non-expansive. Therefore, the significance conclusions with respect to each of the criteria in Draft EIR Section 4.7, *Geology, Soils, and Seismicity*, would be the same for the Intex Alternative as they are for the Project.

### ***Greenhouse Gas Emissions***

Implementation of the Intex Alternative would result in slightly lower construction emissions compared to the Applicant-proposed route primarily because construction of the Intex Alternative would require a total construction disturbance area that would be less than half of that required for the Applicant-proposed route even though the alternative would require a slightly longer access road. In addition, GHG emissions generated during operation and maintenance of the Intex Alternative would be the same as those described for the Project. Therefore, the Intex Alternative would cause incrementally (but inconsequentially) fewer GHG emissions than the Project and the significance conclusions reached in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, for the Project would be the same for the Intex Alternative.

### ***Hazards and Hazardous Materials***

The Intex Alternative is within the regulatory agency database search area reviewed for identification of hazardous materials sites in the vicinity of the Project. No hazardous materials sites are identified in this area; therefore, the impact determinations related to location on a hazardous materials site and the potential to encounter hazardous materials in soil or groundwater during Project construction would be the same for the Intex Alternative as they would be for the Project. Further, the location of the Intex Alternative would not change the impact determinations related to hazards in proximity to schools or airports, wildland fires, and potential to interfere with an adopted emergency response or evacuation plan. Although the total length of the Intex Alternative would be shorter, the Intex Alternative would not substantially lessen the kinds and amounts of hazardous materials associated with Project construction or operation and impact conclusions for the Intex Alternative would be the same as the Project pertaining to the routine transport, use or disposal of hazardous materials or hazards to the public or the environment through reasonably foreseeable upset and accident

conditions. In summary, the Intex Alternative would not change the impact conclusions in Section 4.9, *Hazards and Hazardous Materials*, related to significance criteria a) through h).

### ***Hydrology and Water Quality***

The Intex Alternative would not substantially change the size or type of facilities to be constructed. The Intex Alternative would be slightly shorter and result in less overall land disturbance. Because the Intex Alternative, like the Applicant-proposed route, would cross mostly flat terrain, and differ from the Applicant-proposed route only over a relatively short section, it would result in similar potential impacts with respect to existing water quality standards and the potential for increasing erosion and/or flooding. Similar to the Applicant-proposed route, the construction, operation, and maintenance of the Intex Alternative would generally pose a low threat to water quality due to the level terrain, high rate of soil infiltration, and the regulatory controls that would apply. The mitigation measures that would be required to avoid or reduce the significance of Project impacts also would be required for Intex Alternative (e.g., preparation and implementation of a SWPPP, a WQMP, and, if required, coverage under a water quality certification, and/or WDR). These mitigation measures would be sufficient to reduce potential water quality impacts to a less-than-significant level. Therefore, there would be no change to the conclusions in Draft EIR Section 4.10, *Hydrology and Water Quality*, with regard to hydrology and water quality.

### ***Land Use and Planning***

The Intex Alternative would be located within the Project Area analyzed in the Draft EIR; it would not change the land uses proposed by the Project; physically divide a community; be located within a land use or zoning designation not analyzed in Draft EIR Section 4.11; or conflict with any with applicable land use plans, policies, or regulations. Although the Intex Alternative would be located on land within the as-yet undeveloped West Gate Specific Plan area, this alternative would relocate the subtransmission line and access road from South Highland Avenue to the back of the property paralleling the fence between the Intex Property and the SBFCD ROW, thereby reducing any potential access restrictions that could occur once this area is developed. The Intex Alternative also would require an adjustment in the location of the proposed Intex easement. The Intex Alternative would result in the same impact conclusions as the Project with respect to the significance criteria considered in Draft EIR Section 4.11, *Land Use and Planning*.

### ***Mineral Resources***

The Intex Alternative would not substantially change the size or type of facilities to be constructed. While portions of the Project area do intersect some aggregate resource sectors, the Intex Alternative alignment would not be within an area currently available for extraction of mineral resources. It would be within and bounded to the south by the as-yet undeveloped West Gate Specific Plan area, and bounded by a flood control channel to the north. Therefore, the impact significance conclusions would be the same for the Intex Alternative as they are for the Project in Draft EIR Section 4.12, *Mineral Resources*.

### ***Noise***

Implementation of the Intex Alternative would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaine Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional attenuation of construction equipment and corona discharge noise levels at the condominium complex. Therefore, although the significance conclusion regarding noise and vibration impacts on those sensitive receptors would be the same as for the Project (i.e., less than significant) the Intex Alternative would cause incrementally less noise than the

Project. Mitigation Measure 4.13-5 would apply to the Intex Alternative just as it would to the Project in the event that nighttime construction activities would occur near San Sevaine Road south of I-210 because that area would continue to be within 1,000 feet of the condominium complex.

The segment of the Etiwanda Subtransmission Source Line Route that would be within the City of Rancho Cucamonga is shared by the Intex Alternative and the Applicant-proposed route; therefore, the Draft EIR significant and unavoidable Impact 4.13-1 conclusion associated with construction activities violating City of Rancho Cucamonga exterior noise standards would be the same. Similarly, the Alder Subtransmission Source Line Route would be implemented under both the Intex Alternative and the Applicant-proposed route; therefore, Impact 4.13-6 associated with Rialto Municipal Airport noise would be the same.

In summary, the construction, operation, and maintenance of the Intex Alternative would have an incrementally smaller impact than the Project; however, since the reductions would be so slight, the impact conclusions would be the same for the Intex Alternative as those reached for the Project in Draft EIR Section 4.13, *Noise*.

### ***Population and Housing***

Although total amount of construction associated with the Intex Alternative would be less than the Applicant-proposed route due to the shorter length, the overall number of workers required for construction of the entire Project is not expected to change. The Intex Alternative would not propose new homes or businesses nor displace any housing or people. Operation of the Intex Alternative would not indirectly induce substantial population growth or encourage new development as the Project is designed to meet forecasted demand projections for electrical service. Therefore, construction, operation, and maintenance of the Intex Alternative would have the same population and housing-related effects as the Project (see Draft EIR Section 4.14, *Population and Housing*).

### ***Public Services***

Construction of the Intex Alternative would not change the number of workers required for Project construction discussed in the Draft EIR, nor would it cause an increased demand or need for fire protection, police protection, school facilities, parks, or other public facilities. Therefore, it would not result in the construction of new or expanded existing government facilities for public services. Consequently, the impacts of the Intex Alternative would be the same as the conclusions reached for the Project in Draft EIR Section 4.15, *Public Services*.

### ***Recreation***

The Intex Alternative does not propose any recreational facilities, nor would it change the number of workers required for Project construction described in the Draft EIR. Therefore, it would not cause physical deterioration of existing facilities, or indirectly require construction or expansion of recreational facilities. Implementation of the Intex Alternative would cause the same impacts and result in the same impact significance conclusions as were reached for the Project in Draft EIR Section 4.16, *Recreation*.

### ***Transportation and Traffic***

The Intex Alternative would alter and shorten the Applicant-proposed route by approximately 310 feet and would require the construction and maintenance of approximately 90 feet more of new access road than the Applicant-proposed route. The Intex Alternative would not substantially change the size or type of facilities to be constructed and would not require a workforce or equipment above and beyond what is described in the Draft EIR Chapter 2, *Project Description*, and analyzed in Section 4.17, *Transportation and Traffic*. Because the Intex

Alternative would generate either similar or slightly lower levels of construction traffic along similar roadways as the Applicant-proposed route, potential impacts to transportation and traffic under this alternative would be substantially similar to the Applicant-proposed route. Therefore, Mitigation Measures 4.17-1 and 4.17-2 identified for the Applicant-proposed route also would be required for this alternative. In addition, traffic related to operation and maintenance of the Intex Alternative would be the same as for the Applicant-proposed route because the same number of staff and maintenance activities would be required, so impacts would be the same. Therefore, the impact significance conclusions for the Intex Alternative would be the same as those reached for the Project in Draft EIR Section 4.17, *Transportation and Traffic*.

### ***Utilities and Service Systems***

The Intex Alternative would result in substantially similar water consumption and wastewater and solid waste generation although its subtransmission source line route would be slightly shorter. The slight decrease in length would not substantially change wastewater treatment needs, wastewater treatment facility capacity, water supply needs, or solid waste disposal needs relative to the Project. Consequently, the impact significance conclusions would be the same as those reached for the Project in Draft EIR Section 4.18, *Utilities and Service Systems*.

### **Comparison of the Intex Alternative to the FCD ROW Alternative**

Although the FCD ROW Alternative has been determined to be infeasible for the technical reasons described above, because the FCD ROW Alternative was identified in the Draft EIR as the environmentally superior alternative, a comparison of it and the newly-proposed Intex Alternative is provided for informational purposes. SCE estimates that the overhead subtransmission source line under the Intex Alternative would be approximately 31 feet longer than the FCD ROW Alternative, the underground ROW would be approximately the same length, and the access road would be approximately 1,411 feet longer. The Intex Alternative also would require three more TSPs and three fewer LWS poles than the FCD ROW Alternative. (SCE, 2013a)

As described in this memorandum for the Intex Alternative and in Final EIR Section 2.5.2 for the FCD Alternative, the significance conclusions of the two alternatives would be the same even if some of the intensity of individual effects would vary slightly. The Intex Alternative would result in the disturbance and permanent conversion of more Unique Farmland than the FCD ROW Alternative because it would be constructed nearly all within an easement on land designated as Unique Farmland, rather than within the FCD ROW, which is not designated as Unique Farmland. However, as described above under Agriculture and Forestry Resources, the impact of this conversion already has been analyzed by the City of Fontana General Plan EIR. The Intex Alternative would result in incrementally greater air pollutant and GHG emissions during construction due to its longer overall length and longer access road. However, daily emissions would likely be similar. Similarly, the Intex Alternative would use incrementally more energy during construction.

### **The Intex Alternative is Environmentally Superior to the Project**

As summarized in Draft EIR Section ES.7 (p. ES-9) and analyzed throughout Draft EIR Chapter 4 (p. 4-1 et seq.), the proposed Project would cause no adverse impact related to Agriculture and Forest Resources and Public Services and a less-than-significant impact to the following resources: Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, and Utilities and Service Systems. With the implementation of identified mitigation measures, the Project also would cause a less-than-significant impact to: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Recreation, and Transportation and Traffic. By contrast, it was

determined that development of the Project would cause significant and unavoidable impacts to three resource areas: Aesthetics, Air Quality, and Noise.

As described above, analysis of the environmental effects of the Intex Alternative generally would result in the same impact conclusions as the Project with one exception: The Project's significant and unavoidable Aesthetics impact relative to South Highland Avenue would be reduced by the Intex Alternative to a less than significant level. The Intex Alternative would result in a less than significant (rather than significant unavoidable) impact to viewers on South Highland Avenue, which provides views of scenic vistas to the north, because it would remove the subtransmission line route from South Highland Avenue and, instead, would locate it slightly further north, and thereby would increase the distance between viewers and the subtransmission line. The Intex Alternative would not block views of the San Bernardino and San Gabriel Mountains in the background to the north. In addition, the Intex Alternative would cause incrementally reduced impacts to noise and air quality relative to the Project because the Intex Alternative would be located farther away from sensitive receptors than the Project. For these reasons, the Intex Alternative is environmentally superior to the Project.