Appendix J

Visual Resources Technical Report

VISUAL RESOURCES TECHNICAL REPORT

Control-Silver Peak Project (CSP)
Transmission Line Rating Remediation Program (TLRR)

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Prepared for
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and
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1. INTRODUCTION

This technical report examines visual resources in the area of the Control-Silver Peak Project (Proposed Project) to determine how it could affect the aesthetic character of the landscape. The report includes a description of existing visual conditions and an evaluation of potential visual impacts on aesthetic resources resulting from the construction, operation, and maintenance of the Southern California Edison (SCE) Control-Silver Peak (CSP) Project. The Proposed Project includes modifying existing 55 kV subtransmission facilities along approximately 41 miles of existing utility rights of way (ROWs) in northern Inyo County and southeastern Mono County between US 395 approximately 5 miles north-northwest of Bishop and the Fish Lake Valley Metering Station near the California-Nevada Border.

Visual or aesthetic resources are generally defined as the natural and built features of the landscape that can be seen. Landforms, water, and vegetation patterns are among the natural landscape features that define an area's visual character, whereas buildings, roads and other structures reflect human modifications to the landscape. These natural and built landscape features are considered visual resources that contribute to the public's experience and appreciation of the environment. This report analyzes whether the Project would alter the perceived visual character of the environment and cause visual impacts.

This study conforms to the California Public Utility Commission (CPUC) requirements concerning Proponent's Environmental Assessment (PEA) visual resources evaluation. It also addresses criteria for visual impact analysis set forth by the California Quality Act (CEQA). Included are systematic documentation of the visual setting and evaluation of visual change and potential aesthetic impact associated with the Project. The report text is followed by a set of figures including maps, representative photographs, and computer-generated visual simulations showing existing and post-project views as seen from key observation points (KOPs).

1.1 Project Background

The California Public Utility Commission's (CPUC) General Order 95, Rules for Overhead Electric Line Construction (GO 95), establishes "requirements for overhead line design, construction, and maintenance, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general." GO 95 includes standards for electrical conductor clearances (e.g., the minimum allowable height-above-ground for conductor, the minimum horizontal separation between conductors or conductor and a structure, etc.).

To ensure compliance with GO 95, as well as address other North American Electric Reliability Corporation (NERC) requirements, SCE has initiated its Transmission Line Rating Remediation (TLRR) Program to identify and remediate conductor clearance discrepancies. The CSP project proposes modification or replacement of existing project structures along the route in order to remediate identified GO 95 clearance standard discrepancies (i.e., inadequate overhead clearance distances).

1.2 Project Overview

Located in southeastern California, the Project extends approximately 66 miles through portions of Inyo and Mono Counties (refer to Figure 1). The Project contains the following five distinct geographic Segments:

- Segment 1: The existing Control Substation, located approximately 5 miles southwest of the City of Bishop near the intersection of California State Route 168 (SR-168) and East Bishop Creek Road in unincorporated Inyo County, defines the southern terminus of Segment 1 and the western terminus of the Proposed Project. Segment 1 consists of an approximately 3.3 mile-long section consisting of two single circuit alignments that extends north-northeast to the intersection of US 395 approximately 3.7 miles northwest of Bishop.
- Segment 2: Running north-northeast of the US 395, Segment 2 comprises two parallel single circuit alignments that extend approximately 1.5 miles to a point where the two parallel circuits merge.
- Segment 3: consisting of two parallel single circuit alignments that begin at the eastern end of Segment 2, Segment 3 continues approximately 38 miles to the Fish Lake Valley Metering Station near the California-Nevada border, which defines the eastern terminus of the Project.
- Segment 4: originating at a point along Segment 3 approximately 8 miles east of Control Substation, the Project alignment in Segment 4 consists of an approximately 16 mile-long single-circuit tap that extends north from Segment 3 through the Chalfant Valley to Zack Substation, and defines the northern extension of the Project.
- Segment 5: originating at a point along Segment 3 approximately 8 miles southwest of the eastern end point east of the White Mountains, Segment 5 is a 2.4 mile-long single circuit tap that extends south from Segment 3, approximately one mile northwest of SR-168, to Deep Springs Substation, which defines the southern terminus of the Project.

Major Project components include replacing the two existing single-circuit 55 kV subtransmission lines supported by wood poles in Segment 2 with two single-circuit 55 kV subtransmission lines supported by a combination of ductile iron (DI) and tubular steel poles (TSPs); in Segment 3, replacing two existing single circuit 55 kV subtransmission lines supported by wood poles with one double circuit 55 kV subtransmission line supported by DI, TSP and DI H-frames; and in Segment 5, replacing 8 single-circuited wood poles with eight DI poles. Existing conductor will be removed and replaced with new conductor along all subtransmission lines. Additional project components include installation of approximately 43 miles of optical groundwire and fiber optic cable on new and existing structures in Segments 1, 2 and 3, as well as minor modifications to White Mountain Substation and Fish Lake Valley Metering Station. No subtransmission-related work will be undertaken in Segments 1 and 4.

Section 3.2 includes additional description of the Project's physical characteristics.

1.3 Methodology

The visual analysis is based on site reconnaissance and review of technical data including maps and drawings provided by SCE as well as review of aerial and ground level photographs of the project area, review of public policy and planning documents, and computer-generated visual simulations that portray the project's appearance. Field observations were conducted in October 2017 to document existing visual conditions in the project vicinity, including potentially affected sensitive viewing locations.

The study process began with desktop review of project maps, geographic information system (GIS) data and regional atlas documents as well as review of federal, state, and local plans and policies. The *CSP Visual Resource Sensitivity Briefing Memo*, prepared by Environmental Vision in December 2017 contains a general description of landscape character within the project area, representative photo-documentation, and initial recommendations on key sensitive viewing locations for potential visual simulation.

A set of visual simulations were prepared as part of this technical study to support the impact analysis and illustrate before-and-after visual conditions in the Project area as seen from five key sensitive public viewpoints, or KOPs. The set of KOPs were selected in consultation with SCE and represent views where the project would be most visible to the public from sensitive locations such as designated scenic roadway corridors, recreation facilities, or public land subject to scenic resource management policy.

This visual assessment employs methods based, in part, on those adopted by the U.S. Bureau of Land Management (BLM), the U.S. Department of Agriculture Forest Service (USFS), U.S. Department of Transportation (DOT) Federal Highway Administration (FHWA), and other accepted visual analysis techniques. The impact analysis describes change to existing visual resources, and assesses viewer response to that change. Central to this assessment is an evaluation of key views from which the project will be visible to the public. The visual impact assessment is based on evaluation of the project-related changes to the existing visual resources that will result from construction and operation of the project; the changes were assessed, in part, by evaluating views of the Project provided by the computer-generated visual simulations and comparing them to the existing visual environment. Section 3.3.1 includes Visual Simulations and Visual Change, a description of the technical methods that were employed to prepare the visual simulations.

2. ENVIRONMENTAL SETTING

2.1 Visual Setting

2.1.1 Regional and Local Landscape Context

The Project is located in an area within eastern California, and is part of a physiographic region that extends from the eastern edge of the Sierra Nevada Mountains to the Colorado Plateau. This region is characterized by abrupt changes in topography, with steep, relatively narrow mountain chains, generally oriented on a north-south axis, that are separated by flat, arid alluvial valleys. Figure 1 shows the Project location within the regional landscape context.

The Project area extends from the Owens Valley on the west to Fish Lake Valley on the east and is dominated by the intervening White Mountains. Elevations in the Project area range from approximately 4,200 feet in the valley bottoms to over 10,000 feet above sea level at its high point, with broad panoramic vistas of the surrounding terrain available from many locations. The predominant vegetation cover consists of sparse, low-growing desert scrub, punctuated by scattered stands of stunted coniferous forest at higher elevations. Exposed areas of underlying soil and rock, consisting of light-colored volcanic pumice and sand, interspersed with darker outcrops of basalt and shale, are a predominant visual element. When seen in conjunction with the surrounding vegetation, this exposed rock and soil pattern contributes to the predominant mottled color and texture seen in the landscape.

The region's diverse, natural landscape scenery attracts seasonal recreational visitors including hikers, off-road vehicle users, and campers. The local population is almost entirely concentrated within the northern Owens Valley in and around Bishop, a regional tourist destination and community of approximately 3,800 residents located at the junction of US 395 and SR-168. This population includes members of the Bishop-Paiute tribe who occupy reservation land that lies partly within the city. Scattered residential areas are also found along Silver Canyon Road in the town of Laws east of Bishop and along SR-6 within Chalfant Valley to the north. The isolated Deep Springs Valley, east of the White Mountains, is the location of Deep Springs College, a private educational facility whose resident population is less than 100.

Outside developed locations described above, the Project Area is sparsely populated, and includes large portions with restricted public access. Paved roads are limited to relatively few locations within the valley bottoms and at widely spaced mountain crossings, with US 395, the main north-south highway through the Owens Valley, and the east-west aligned SR-168 constituting the primary vehicle access routes through the region. Narrower secondary paved and unpaved roadways, many consisting of gravel tracks only suitable for off-road vehicles, also provide access within the Project area.

Established built landscape features seen within the overall project area include wood utility poles, overhead power lines including the project alignment, substations, and telecommunications towers. Additionally, the lattice steel towers supporting the LADWP 230 kV transmission line are notable visible elements in the Owens Valley. Due to the scattered population and limited development, sources of nighttime lighting are localized and sparse, mainly found around Bishop and localized communities in Chalfant and Deep Springs Valleys.

The majority of the Project lies on undeveloped land, within unincorporated portions of Inyo and Mono Counties in California with large portions situated on land administered by the U.S. Forest Service and Bureau of Land Management (BLM).

From the western terminus of the Project at Control Substation, located in the open, high desert landscape at the northwestern edge of the Owens Valley, the Project alignment crosses SR-168, a designated state scenic highway, and US 395, an eligible state scenic highway, and skirts residential areas on the outskirts of Bishop, approximately 5 miles northeast of the substation. After passing over the historic railroad town of Laws east of Bishop, the alignment enters the Inyo National Forest and traverses the rugged, for the most part sparsely forested White Mountains, largely paralleling unpaved access roads and ultimately reaching an elevation of approximately 10,800 feet. From the summit of the White Mountains the Project alignment

follows Wyman Canyon to Deep Springs Valley where it enters BLM administered land and follows SR-168, the primary east-west paved roadway through the region. Running generally parallel to SR-168 the alignment continues northeast for approximately 9 miles, traversing the approximately 6,400-foot high Gilbert Summit and crossing SR-168 multiple times before descending to Fish Lake Valley's flat, open desert agricultural landscape. The Project's eastern terminus is the Fish Lake Valley Metering station near the California state line.

Two shorter taps (segments) extend from the main Project alignment including Zack Tap, a 16 mile long extension northeast of Bishop into the Chalfant Valley, an area of scattered residences, and east of the White Mountains, within Deep Springs Valley, the approximately 2.4 mile-long Deep Springs Tap bifurcates from the main Project alignment to terminate at Deep Springs Valley Substation at Deep Springs College, a small private residential campus.

2.1.2 Project Viewshed

The project viewshed is defined as the general area from which a project is visible. For purposes of describing a project's visual setting and assessing potential visual impacts, the viewshed can be broken down into foreground, middleground, and background zones. The foreground is defined as the zone within 0.25 to 0.5 mile from the viewer. The middleground is defined as the zone extending from the foreground to a maximum of 3 to 5 miles from the viewer; and the background zone extends from the middleground to infinity (U.S. Department of Agriculture Forest Service 1995).

Viewing distance is a key factor that affects the potential degree of project visibility. Visual details generally become apparent to the viewer when they are observed in the foreground, at a distance of 0.25 to 0.5 mile or less. Analysis of the Proposed Project primarily considers the potential effects of project elements on foreground viewshed conditions although consideration is also given to the potential effects on the middleground and background views.

2.1.3 Landscape Units and Representative Views

Two Landscape Units are utilized for purposes of documenting and describing existing visual conditions within the Project viewshed. These Landscape Units or subareas are based upon the physical and cultural landscape characteristics found along the Proposed Project alignment. Table 1 summarizes the Landscape Units in terms of their location and approximate length. Figure 1 depicts the location of Landscape Units in relationship to the project alignment and photograph viewpoints.

Table 1: Summary of Landscape Units

Landscape Unit	Location	Approximate Length
1: Control Substation to Inyo National Forest boundary	Inyo County	12 miles does not include Zack Tap
2: Inyo National Forest Boundary to Fish Lake Valley Metering Station near the California/Nevada Border	Mono County and Inyo County	33 miles including Deep Springs Tap

Figures 2a through 2p present a set of 32 photographs taken from representative locations along the alignment, within the Project viewshed. Table 2, a summary of this set of representative photographs, includes information on the viewpoint location, primary type of viewers, backdrop conditions, and approximate viewing distance to the Project. In addition, Table 2 also highlights a subset of the photographs that are KOPs. Taken together, these photographs convey a general sense of the existing visual character of the landscape within the vicinity of the Project. The set of photographs also demonstrates that existing transmission, subtransmission and distribution facilities within the Project viewshed, including those of the Project, are established elements of the visual setting of the area.

Table 2: Summary of Representative and KOP Photographs

Photograph number and Location * denotes KOP	Primary Viewers	Viewing Distance	Predominant Backdrop for Project Structures
LANDSCAPE UNIT 1			
1. SR-168 crossing near Control Substation	Recreational Motorists Local Motorists	500 feet	Landscape
2. SR-168 near Control Substation	Recreational Motorists Local Motorists	1,000 feet	Landscape
3. Bishop Creek Battleground Historic Marker	Recreational Motorists	0.2 mile	Landscape
4. Rocking K Road at Ed Powers Road	Local Motorists	0.4 mile	Landscape
5. US 395 west of Bishop	Regional Motorists	500 feet	Landscape and Sky
6. US 395 west of Bishop	Regional Motorists	350 feet	Landscape and Sky
7. Saniger Lane at Dixon Lane	Residents	0.5 mile	Landscape
8. SR-6 north of Bishop	Regional Motorists Local Motorists	0.25 mile	Landscape
*9. Silver Canyon Road at Laws Railroad Museum	Recreationalists Local Motorists	150 feet	Landscape and Sky
*10. Laws Railroad Museum	Recreationalists	100 feet	Sky and Landscape
LANDSCAPE UNIT 2			
*11. Silver Canyon Road at Inyo National Forest boundary	Recreationalists	350 feet	Landscape
12. Silver Canyon Road in lower canyon	Recreationalists	200 feet	Landscape
13. Silver Canyon Road in upper canyon	Recreationalists	160 feet	Landscape
14. Silver Canyon Road near high point	Recreationalists	1000 feet	Landscape and Sky

Photograph number and Location * denotes KOP	**Primary Viewers**	**Viewing Distance**	**Predominant Backdrop for Project Structures**
15. Silver Canyon Road near White Mountain overlook	Recreational Motorists Recreationalists	400 feet	Landscape
16. Silver Canyon Road near White Mountain Substation	Recreational Motorists Recreationalists	< 300 feet	Landscape
17. White Mountain Road (Ancient Bristlecone Scenic Byway)	Recreational Motorists Recreationalists	300 feet	Sky
*18. White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road	Recreational Motorists Recreationalists	400 feet	Landscape
19. Wyman Creek Road at historic cabin	Recreationalists Recreational Motorists	100 feet	Landscape and Sky
20. Wyman Creek Road in upper canyon	Recreationalists Recreational Motorists	250 feet	Landscape and Sky
21. Wyman Creek Road in middle of canyon	Recreationalists Recreational Motorists	375 feet	Landscape
22. Wyman Creek Road near Roberts Ranch	Recreationalists Recreational Motorists	150 feet	Landscape
23. Wyman Creek Road in lower canyon	Recreationalists Recreational Motorists	200 feet	Landscape
24. Wyman Creek Road at Inyo National Forest boundary	Recreationalists Recreational Motorists	100 feet	Landscape
*25. Wyman Creek Road near Inyo National Forest boundary	Recreationalists Recreational Motorists	325 feet	Landscape
26. Wyman Creek Road in Deep Springs Valley	Recreationalists Recreational Motorists	450 feet	Landscape
27. SR-168 in Deep Springs Valley	Local and Regional Motorists	250 feet	Landscape and Sky
28. SR-168 east of Gilbert Summit	Regional motorists Local Motorists	150 feet	Sky and Landscape
29. SR-168 in Fish Lake Valley	Local and Regional Motorists	250 feet	Sky and Landscape
30. SR-266 in Fish Lake Valley	Regional Motorists	0.3 mile	Landscape
31. SR-168 near Deep Springs College	Residents Local and Regional Motorists	350 feet	Landscape and Sky
32. Deep Springs College entry road	Residents	0.4 mile	Landscape

Landscape Unit 1 (Photographs 1 through 10)

Landscape Unit 1 begins at Control Substation and extends east approximately 12 miles to the boundary of Inyo National Forest. Located within the generally flat northern Owens Valley at an elevation of approximately 4,150 feet above sea level, this landscape unit is dominated by the City of Bishop. Situated near the confluence of the Owens River and adjacent creeks draining the nearby mountains, land use in this area is characterized by a mixture of undeveloped open space, residential and commercial development and scattered agricultural and recreational uses. In contrast to the characteristic high desert scrubland that is most typical of the regional landscape, the area in the vicinity of Bishop appears distinct due to availability of surface as well as groundwater. Riparian marshes and cottonwoods occupy the floodplains north and east of the city, and areas of irrigated pasture extend out from Bishop's commercial center, along with landscaped residential districts that include numerous mature trees.

Photographs 1 through 10 show representative views of the Project and surrounding landscape character found within Landscape Unit 1. Two of these views are KOPs selected to show the Project as seen from sensitive locations including viewpoints at the Laws Railroad Museum (refer to Figures 1 and 2). Appendix A includes a detailed description of each representative photograph.

Landscape Unit 2 (Photographs 11 through 32)

Approximately 2 miles east of Laws, the Project crosses into the Inyo National Forest, near the entrance to Silver Canyon. Landscape Unit 2 runs approximately 31 miles east from the forest boundary to near the California state line. As shown on Figure 1, this Landscape Unit includes an approximately 2.4 mile extension south to Deep Springs Substation. In this landscape unit, the broad, open vistas characteristic of the comparatively flat, sparsely vegetated Owens Valley give way to the more varied topography and vegetation of the White Mountains where, open, long-range views of the Project alignment are limited, and close-range views of Project elements are more prevalent when access routes pass through relatively narrow canyons. At the same time, variations in topography as well as variable daylight conditions have a noticeable influence on the visibility of poles and overhead conductors.

Photographs 11 through 32 show representative views of the Project and surrounding landscape character found within Landscape Unit 2. Three of these views are KOPs selected to show the Project as seen from sensitive locations in the White Mountains (refer to Figures 1 and 2). Appendix A includes a detailed description of each representative photograph.

2.1.4 Potentially Affected Viewers

Accepted visual assessment methods, including those adopted by the BLM, USFS, and other federal agencies, establish sensitivity levels as a measure of public concern for changes to scenic quality. Viewer sensitivity, one of the criteria used to evaluate visual impact significance, can be divided into high, moderate, and low categories. Factors considered in assigning a sensitivity level include viewer activity, view duration, viewing distance, adjacent land use, and special management or planning designation. Visual sensitivity will vary with the type of users (BLM 1984). The primary viewer groups within the Project viewshed are described below.

2.1.4.1 Motorists

Motorists or roadway travelers are the largest viewer group in the project area. Included in this group are motorists traveling on the region's network of paved roadways, such as SR-168, US 395, SR-6 and SR-266, which are crossed by the Project. Recreational roadway users also include those using unpaved BLM and USFS off-highway vehicle (OHV) recreation routes within Silver and Wyman Canyons, as well as visitors accessing the Bristlecone forests in the White Mountains along White Mountain Road.

Motorists include both local and regional travelers who are familiar with the visual setting and recreational travelers using area roadways on a less regular basis. Local travelers include those commuting to or residents of Bishop, as well as drivers of commercial vehicles. Regional motorists include long distance truck drivers, and recreational visitors to the area as noted below. The duration of motorists' views is generally brief, and depending upon the travel route and type of roadway, could range from a few seconds to up to several minutes. Viewer sensitivity is considered low to moderate.

2.1.4.2 Recreationalists

Recreationalists, including visitors to the Inyo National Forest, and BLM lands constitute another important viewer group. Activities include sightseeing, winter sports, on- and off-road vehicle touring, hiking, bird watching, wildlife viewing, photography, stargazing, fishing, camping, horseback riding, running, bicycling, backpacking, and rock climbing. Off-road vehicle users include those using unpaved USFS or BLM off-highway vehicle (OHV) recreation routes within the Silver Creek Canyon and Wyman Canyon in the White Mountains. Although the total duration of views for much of this viewer group tends to be short, the general expectation of a natural-appearing landscape setting among some recreationalists raises the sensitivity to moderate to high.

2.1.4.3 Residents

As described in Section 3.1.1, the Project area is predominantly uninhabited, with residential populations largely concentrated in and immediately around Bishop within the Owens Valley where views toward the Project are either screened by intervening structures and vegetation., or where open views are available, as in the case of residents along Bishop's northern perimeter, the Project is not particularly noticeable due to distance or backdrop conditions. A limited number of residences border the Project corridor, and in these cases close range views of Project structures may be available. Locations of these residential viewers include places in or near the town of Chalfant Valley, Laws, and Deep Springs College in Deep Springs Valley. Residential views tend to be long in duration, and the sensitivity of this viewer group is considered moderate to high.

2.1.5 Scenic Resources

Scenic resources are those natural and built landscape patterns and features that are considered visually or aesthetically pleasing, and therefore contribute positively to the definition of a distinct community or region. Scenic resources may include trees or other important vegetation; landform elements, such as hills or mountains, ridgelines or rock outcroppings; water features, such as rivers, bays, or reservoirs; and landmarks, important buildings, or historic sites and structures.

As described in Section 2.1.3, the White Mountains, including the Ancient Bristlecone Pine Forest, constitute a dominant landscape feature and scenic resource that is visible from many locations within the Project area. Additional scenic resources described in Section 3.1.3 include landscape features of the Owens Valley, as well as built features such as the Laws Railroad Museum historical site and Wyman Canyon historical cabins, including Robert's Ranch complex.

In addition, various public roadways are recognized for providing visual access to scenic resources in the project vicinity. Table 3 is a summary of designated scenic routes in the project area. In the Owens Valley near its western terminus at Control Substation the project crosses SR-168 where this roadway is a designated State Scenic Highway. Additionally, north of Bishop the Project crosses US 395, which is an eligible State Scenic Highway and is also designated as the Eastern Sierra Scenic Byway by a coalition partnership of public agencies and recreation providers. Within the White Mountains, the Project crosses White Mountain Road, which is a part of the Ancient Bristlecone Scenic Byway, a 34 mile-long route that follows a portion of SR-168 and continues along White Mountain Road to the Patriarch Grove. On the east side of the White Mountains, the Project crosses SR-168 once again where it is an eligible State Scenic Highway on its trajectory through Deep Springs Valley and over Gilbert Summit, as is SR-266, crossed by the Project near its eastern terminus in Fish Lake Valley.

Approximately 20 miles of the Project crosses Inyo National Forest, administered by the USFS, and approximately 18.5 miles of the Project crosses BLM-administered land. Section 2.2.1, Regulatory Setting provides additional detail on policies regarding scenic resources and the Figure 3 maps show BLM and USFS visual management zones in the project area.

Table 3: Summary of Scenic Roadways Within the Project Area

Roadway *location*	**Designation**	**Relationship to Project**	**Representative Photograph and Viewpoint #** (Figures 1 and 2)
Ancient Bristlecone Scenic Byway *Inyo National Forest*	National Scenic Byway	Project crosses	17, 18
SR-168 *west of US 395*	Designated State Scenic Highway	Project crosses near Control Substation	1, 2
SR-168 *east of US 395, Inyo and Mono Counties*	Eligible State Scenic Highway Mono County Scenic Highway	Project crosses and runs parallel	27, 28, 29, 31
US 395 *Inyo County*	Eligible State Scenic Highway	Project crosses	5, 6
SR-266 *Mono County*	Eligible State Scenic Highway	Project crosses	30

2.2 Regulatory Setting

2.2.1 Federal

2.2.1.1 Federal Land Policy and Management Act of 1976

The Federal Land Policy and Management Act of 1976 (FLPMA) (43 United States Code [U.S.C.] 1701) and the U.S. Department of the Interior's (DOI) Bureau of Land Management (BLM) Land Use Planning Handbook (BLM 2005) both emphasize the importance of protecting the quality of scenic resources on public lands. FLPMA sections relevant to Project are:

Section 102(a): "The public lands [shall] be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values."

Section 103(c): Identifies "scenic values" as resources for public management. Section 201(a): "The Secretary shall prepare and maintain on a continuing basis and inventory of all public lands and their resources and other values (including...scenic values)."

Section 505(a): "Each right-of-way shall contain terms and conditions which will...minimize damage to the scenic and esthetic values."

FLPMA's legal mandate to protect the quality of scenic resources on public lands is carried out by BLM and detailed in BLM's Visual Resource Management (VRM) system, described below.

2.2.1.2 U.S. Department of Agriculture, Forest Service (USFS)

For purposes of managing visual resources of lands within their jurisdiction, the USFS applies an inventory and assessment system known as the Scenery Management System (SMS). Adopted in 1995, the SMS establishes management goals to describe the level of modification associated with land use activity that is acceptable in a given area. These standards or Scenic Integrity Objectives (SIOs) range from "Very High", which is typically applied only to highly sensitive landscapes such as wilderness areas or special classified areas, to "Very Low", a standard that allows land use activity that may appear dominant in relationship to the natural landscape while not completely harmonizing with the natural setting (USDA, 1995). Only one SIO class applies to any given area. It is important to note that the SIO does not necessarily represent current scenery conditions, but instead is a guideline for forest management objectives over time **(Table 4).**

Table 4: USFS Scenery Management System Scenic Integrity Objectives

Scenic Integrity Objective (SIO)	Characteristics
Very High	This SIO generally provides for ecological changes only. This refers to landscapes where the valued (desired) landscape character is intact with only minute, if any, deviations. The existing landscape character and sense of place is expressed at the highest possible level. The landscape is unaltered.

High	This SIO is used for landscapes where the valued landscape character "appears intact." Deviations may be present but they must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.
Moderate	This SIO is used for landscapes where the valued landscape character "appears slightly altered." Noticeable deviations must remain visually subordinate to the landscape character being viewed.
Low	This SIO is used for landscapes where the valued landscape character "appears moderately altered." Deviations begin to dominate the valued landscape character being viewed but they borrow value attributes such as size, shape, edge effect and pattern of natural openings, vegetative type changes, or architectural styles outside the landscape being viewed. They should not only appear as valued character outside the landscape being viewed but should be compatible or complimentary to the character within.

Source: USFS, 1995

2.2.1.3 U.S. Department of Agriculture, Forest Service. Draft Revised Land Management Plan for the Inyo National Forest

Approximately 20 miles of the Project alignment cross the Inyo National Forest. The *Draft Revised Land Management Plan for the Inyo National Forest* establishes management objectives for this area. As shown on the Figure 3a map, approximately 7.6 miles of the Project cross parts of the Inyo National Forest with Scenic Integrity Objectives (SIO) of Moderate; under this SIO noticeable deviations in the setting must remain visually subordinate to the landscape character being viewed. Approximately 12.5 miles of the Project cross areas with SIO of High where, as noted in Table 4 above, deviations may be present but they must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident. Note, an updated *Land Management Plan for the Inyo National Forest (2019)* has been finalized and is expected to be approved in late 2019, and in this updated plan the SIO for the Project area are unchanged.

2.2.1.4 U.S. Department of Agriculture, Forest Service. National Forest Scenic Byway Program

The National Forest Scenic Byways are roads that have been designated by the U.S. Forest Service as scenic byways. The Ancient Bristlecone Scenic Byway begins on the outskirts of Bishop in the Owens Valley at the junction of US 395 and SR-168. The roadway climbs through Pinyon Pine-Juniper woodlands within the Inyo National Forest and continues along White Mountain Road to the summit of the White Mountains where it terminates at Patriarch Grove of ancient Bristlecone pines. The Project crosses this scenic roadway near White Mountain Substation.

2.2.1.5 U.S. Department of Interior, Bureau of Land Management (BLM)

The Federal Land Policy and Management Act of 1976 requires BLM to protect the quality of scenic values on public lands (43 U.S.C. 1701). To this end, BLM has developed the Visual Resource Management (VRM) system to identify and maintain scenic values and visual quality. Under this system, BLM-administered lands are inventoried, analyzed, and assigned visual ratings or Management Classes. Class designations are derived from an analysis of scenic quality (rated by landform, vegetation, water, color, influence of adjacent scenery, scarcity, and cultural

modification), a determination of viewer sensitivity levels (sensitivity of people to changes in the landscape), and distance zones. Management Classes describe the different degrees of modification allowed to the basic elements of the landscape (form, line, color, texture). Management classes and their corresponding goals are defined in Table 5 and discussed below.

Table 5: BLM Visual Management Classes and Goals

Management Class	Goals
Class I	To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention.
Class II	To retain the existing character of the landscape. The level of change to the characteristic landscape should be low.
Class III	To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate.
Class IV	To provide for management activities that require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.

Source: BLM

A portion of the Project alignment crosses BLM-administered land in the Owens Valley and east of the White Mountains. The Figure 3b map shows the Project with VRM classifications on BLM-administered land. Approximately 2 miles of the Project located in the Owens Valley, Landscape Unit 1, cross lands with BLM classification of VRM Class III. In addition, Zack Tap crosses another 4.4 miles of BLM Class III land. The BLM management goals in Class III areas allow for a moderate level of change to existing landscape character. In these areas management activity may attract attention, but should not dominate the view of the casual observer.

East of the White Mountains, within Landscape Unit 2, approximately 10 miles of the Project alignment crosses BLM administered land that is VRM Class II. In addition, Zack Tap crosses another 2.2 miles of BLM Class II land. Management goals for BLM Class II areas call for retaining the existing landscape character and allow for a low level of change to existing landscape character and any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

2.2.1.6 BLM Desert Renewable Energy Conservation Plan (DRECP) Record of Decision

Covering more than 20 million acres in seven California counties including Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego County, the DRECP was developed as an interagency plan by the BLM, the U.S. Fish and Wildlife Service (USFWS), the California Energy Commission (CEC), and the California Department of Fish and Wildlife. The BLM manages approximately 10 million acres of the 22.5 million acres covered in the overall Plan area.

The DRECP landscape-scale planning effort was undertaken to achieve two sets of overarching goals. The first is Renewable Energy. To address these goals, the plan identifies specific development focus areas with high- quality renewable energy potential and access to

transmission in areas where environmental impacts can be managed and mitigated. The second overarching goal concerns Conservation. The plan specifies species, ecosystem and climate adaptation requirements for desert wildlife, as well as the protection of recreation, cultural, visual, and other desert resources. Through the DRECP Record of Decision (ROD) an approved Land Use Plan Amendment (LUPA) establishes a policy framework for BLM-managed land, including management and conservation of visual resources. Figure 11 of the DRECP LUPA is a map of the plan area showing VRM Classes for the entire planning area (September 2016).

BLM-administered land crossed by the Project east of the White Mountains is within the area governed by the DRECP ROD. A map of the Project area showing the Project alignment with VRM classes on BLM-administered is included as Figures 3b.

2.2.1.7 BLM Bishop Resource Management Plan Record of Decision

The Owens Valley section of the Project alignment crosses BLM-administered land that lies outside the area governed by the DRECP that is located in the Bishop Resource Management Plan area, which includes BLM-managed land in both Management Area 6-Benton, and Management Area 7-Owens Valley. The Bishop Resource Management Plan (RMP) provides guidance for these areas. Area-wide visual resources policies of the Bishop RMP Record of Decision (1993) require use of non-specular wire and corten steel towers for all power lines, and also calls for managing all activities to conform with Visual Resource Management (VRM) standards, stating that enforcement emphasis for Visual Resource Management (VRM) classes II-IV will be along key observation points. Outside key observation points, the Bureau will apply designated VRM class prescriptions but the Area Manager may allow development to exceed the VRM class for reasons such as technological infeasibility or low visitor use. Figure 3b is a map of the Project area showing the Project alignment with VRM classes on BLM-administered land.

2.2.1.8 Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands

Bureau of Land Management guidance is provided in this document in the form of 122 best management practices (BMPs) to avoid or reduce potential visual impacts associated with the siting, design, construction, operation, and decommissioning of utility-scale renewable energy generation facilities, including wind, solar, and geothermal facilities as well as ancillary components, such as electric transmission structures and access. Selection of structure types and selection of appropriate materials surface treatments are among the pertinent BMPs outlined in this document to minimize potential visual effects and contrast associated with transmission facilities.

2.2.1.9 U.S. Department of Transportation. National Scenic Byways Program

The National Scenic Byways Program was established under the Intermodal Surface Transportation Efficiency Act of 1991, and reauthorized in 1998 under the Transportation Equity Act for the 21st Century. Under the program, the U.S. Secretary of Transportation recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities. The act allows states, the BLM, the USFS, and other agencies to apply for funding to enhance the intrinsic qualities of the roadways. The Ancient Bristlecone Scenic Byway, which the project crosses, is listed as a National Scenic Byway.

2.2.1.10 Federal Aviation Administration

Generally, marking or lighting is recommended by the FAA for those spans or structures that exceed 200 feet in height above ground level (AGL); however, marking or lighting may be recommended for spans and structures that are less than 200 feet AGL, but located within close proximity to an airport or other high-density aviation environment.

2.2.2 State

2.2.2.1 California Department of Transportation: Scenic Highway Program

The State Scenic Highway Program—a provision of Sections 260 through 263 of the Streets and Highways Code—was established by the Legislature in 1963 to preserve and enhance the natural beauty of California. The State Scenic Highway System includes highways that are either eligible for designation as scenic highways or have been designated as such. The status of a State Scenic Highway changes from "eligible" to "officially designated" when the local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation (Caltrans) for scenic highway approval, and receives the designation from Caltrans. A city or county may propose adding routes with outstanding scenic elements to the list of eligible highways. However, State legislation is required.

From the City of Bishop west to Lake Sabrina, SR-168 is a designated State Scenic Highway. The Project crosses this designated State Scenic Highway near Control Substation. The Project also crosses sections of US 395, SR-168, and SR-266 that are eligible State Scenic Highways (refer to Figure 1).

2.2.2.2 California State Parks Office of Historic Preservation (OHP) California Landmarks and Points of Historic Interest

The OHP is responsible for administering federally and state mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's historic resources including California Historic Landmarks and Points of Historic Interest. These resources are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. Description of the Project's visual setting includes two such resources.

Situated approximately 0.35 mile from Control Substation the Bishop Creek Battleground Historical Marker is located off of SR-168, and commemorates an historic battle between newly arrived citizens of Owens River Valley and the original inhabitants of the land, the Paiute and Shoshone Indians. Photograph 3 (Figure 2b) is a view toward the Project from this marker.

Listed on the National Registry of Historic Places, the Laws Railroad Museum and Historical Site is a designated California Landmark that includes almost 50 structures on 11 acres commemorating the history of Owens Valley and the Eastern Sierra. The Project alignment crosses the Museum site, which is located approximately four miles northeast of Bishop in the community of Laws. Photographs 9 and 10 (Figure 2e) include the Laws Railroad Museum.

2.2.3 Local

The California Public Utilities Commission (CPUC) has sole and exclusive state jurisdiction over the siting and design of the Project. Pursuant to CPUC General Order 131-D (G.O. 131-D),

Section XIV.B, "Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the CPUC's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the Project. Accordingly, the following discussion of local land use regulations is provided for informational purposes only.

2.2.3.1 Inyo County General Plan

The Inyo County General Plan Circulation Element and Conservation/Open Space Element contain the following goals and policies, respectively:

Goal SH-1. Maintain a system of scenic routes that will preserve and enhance the quality of life for present and future generations.

Policy SH-1.3. Expand Scenic Route Designations. The County will work with Caltrans to obtain Scenic Route designations on all portions of U.S. 395 and State Routes 168 and 190. The County should also work with Caltrans to identify and have designated other scenic corridors in the County

Goal VIS-1. Preserve and protect resources throughout the County that contribute to a unique visual experience for visitors and quality of life for County residents.

2.2.3.2 Mono County General Plan

The eastern end of the Project as well as the Zack Tap segment are located in unincorporated Mono County. The Circulation and Conservation and Open Space Elements of the *Mono County General Plan* (2009) contain policies related to visual resources in the project area as follows:

The Circulation Element

Objective 2.A. Minimize the impact on the environment and scenic resources of communications projects and infrastructure.

Action 2.A.1.c. Encourage placement of towers outside community areas.

The Conservation and Open Space Element

This General Plan element states that visual impacts of utility corridors and overhead utility lines have become an issue both in community areas and undeveloped areas. Goals and policies are included under topics of Energy Resources and Visual Resources.

GOAL 14. Minimize the visual, environmental, and public health and safety impacts of electrical transmission lines and fluid conveyance pipelines.

Policy 14.A.9. Require that materials used to construct transmission towers harmonize with the natural surroundings. Self-protecting bare steel and other types of non-reflective surfaces are appropriate in many areas. Towers constructed of material other than steel, such as concrete, aluminum, or wood should be considered. Coloring of transmission line towers to blend with the landscape should be considered.

Policy 14.A.10. Above-ground transmission lines shall be non-specular wire construction.

GOAL 20. Protect and enhance the visual resources and landscapes of Mono County.

Policy 20.A.1. In order to protect and enhance important scenic resources and scenic highway corridors as identified in the Master Environmental Assessment (MEA), designate such areas throughout the county for Open Space, Agriculture, Resource Management, or similar low intensity uses.

Action 20.A.1.a. Identify important scenic resources, including scenic highway corridors, in the MEA.

Policy 20.A.3. Preserve the visual identity of areas outside communities.

Objective 20.B. Maintain a countywide system of state and County-designated scenic highways. (See RTP for designated roads.)

Policy 20.B.1. Maintain existing State-designated scenic highways.

Action 20.B.1.a. Enforce required regulations for protection of roadways designated as state scenic highways.

Action 20.B.1.b. Work with appropriate agencies to protect visual resources within existing designated scenic highway corridors.

Policy 20.B.3. Maintain existing County-adopted scenic highways.

Policy 20.C.3. Proposed transmission and distribution lines shall be designed and sited to minimize impacts to natural and visual resources.

2.2.3.3 Mono County Regional Transportation Plan – 2015 update.

The Mono County Regional Transportation Plan includes a list of County Scenic Highways as well as goals and policies summarized below. SR-168 within Fish Lake Valley is the only county scenic roadway within sight of the Project.

Goal 6. Develop and enhance the transportation and circulation system in a Manner that protects the county's natural and scenic resources and that maximizes opportunities for viewing those resources.

Policy 6.B. Maintain State and Local scenic highway and byway designations and provide opportunities to enhance/interpret natural and scenic resources along those routes.

Policy 6.C. Designate additional Federal, State, and Local scenic highways and byways within the county.

2.2.4 Other

2.2.4.1 Coalition for Unified Recreation in the Eastern Sierra (CURES), Eastern Sierra Scenic Byway

Part of US 395 is designated as the Eastern Sierra Scenic Byway by a partnership coalition of public and private recreation providers. The Scenic Byway extends from Topaz Lake at the Nevada-California border south to Olancha along US 395, which is crossed by the Project on the outskirts of Bishop (this roadway is not part of the National Scenic Byway program). The partnership program includes the Coalition for Unified Recreation in the Eastern Sierra

(CURES), federal agencies such as USFS, the BLM, the US National Park Service and the Federal Highway Administration, in addition to state and local agencies and other entities such as the California Department of Fish and Game, CALTRANS, Los Angeles Department of Water and Power, and various chambers of commerce.

3. IMPACTS

3.1 Significance Criteria

To determine the significance of the anticipated visual changes, the project's effects were evaluated according to criteria provided in Appendix G of the CEQA Guidelines, which indicates that a project will have a significant effect on the environment if it will:

- Have a substantial, adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area.

3.2 Applicant Proposed Measures (APMs)

The following aesthetic/visual resource-specific APMs would be incorporated into the Proposed Project.

3.2.1 APM AES-1 *Glare Reduction for Subtransmission Structures and Conductors:*

To reduce potential glare for components of the proposed project, the finish on all new subtransmission structures will be non-reflective, and treated to create a dulled finish. These types of finishes are designed to reduce light reflection and help blend the structures into the landscape setting. All new subtransmission/transmission conductors shall be non-specular and non-reflective and the insulators shall be non-reflective and non-refractive to help reduce glare and minimize contrast with the surrounding environment.

3.2.2 APM AES-2 *Minimize Vegetation Removal:*

Only the minimum amount of vegetation necessary for the safe construction and operation of structures and facilities will be removed.

3.3 Physical Characteristics of the Project

The Project consists of mitigating existing GO 95 discrepancies by selectively replacing or modifying individual poles and rebuilding existing subtransmission circuits within approximately 41 miles of existing ROW. No new substations or major modifications to existing substations are included in the Proposed Project. Table 6 provides summary descriptions of the replacement structures with their typical dimensions. Appendix C includes typical elevation drawings of the replacement structures.

Table 6: Summary of Replacement Subtransmission Structures

Structure Type	Proposed number of Replacement Structures	Approximate Height above Ground (Feet)	Number of Existing Structures	Approximate Height Above Ground, Existing Structures (Feet)
Segment 1				
No subtransmission-related components will be installed	-	-	-	-
Segment 2				
TSP	3	74 – 93	-	-
DI Pole	22	65 – 93		
Wood Pole	-		49	24 – 63
Segment 3				
TSP	139	60 – 90	-	-
TSP H-Frame	8	50 – 65	-	-
DI Pole	521	56 – 106	-	-
LWS Pole	29	83 – 102	-	-
Wood Pole	-	-	1,508	24 – 63
Segment 4				
No subtransmission-related components will be installed				
Segment 5				
DI Pole	8	40 – 56	-	-
Wood Pole	-	-	8	35 – 47

3.3.1 Subtransmission and additional Poles

Segment 1: no poles would be installed or removed in Segment 1.

Segment 2: approximately 49 existing wood poles and LST's would be removed and replaced with approximately 22 DI poles and 3 TSPs.

Segment 3: approximately 1,508 existing wood poles would be removed and replaced with approximately 521 DI poles, 139 TSPs, 8 TSP H-Frames and 29 LWS Poles. Additionally, where three wood poles along an approximately 400-foot length of the existing subtransmission pole line in the community of Laws support a distribution circuit and streetlights, existing poles will be shortened and will remain to support distribution circuit and streetlights.

Segment 4: the existing distribution circuitry on two subtransmission poles along Zack Tap would be lowered.

Segment 5: approximately 8 existing wood poles would be removed and replaced with 8 DI Poles.

Conductor
Conductor span lengths would vary depending upon topography, engineering, and site considerations. Spans would range from approximately 30 feet to 700 feet. The conductor will be non-specular, and will have a diameter of approximately 0.7 inches.

Lighting
No permanent lighting is proposed as part of the Project. It is noted, as outlined in Section 2.2.1, SCE would consult with the FAA and implement recommendations for safety lighting, to the extent feasible.

Marker Balls
SCE would consult with the FAA and implement recommendations for the installation of marker balls to the extent feasible.

3.3.2 Temporary Construction Areas and Post-Construction Restoration

Staging Yards /Construction Laydown Areas
Construction of the Project would require the establishment of temporary staging yards /construction laydown areas, located within SCE ROW or franchise, or in previously-disturbed areas adjacent to access roads. Staging yards would be used as a reporting location for workers, vehicle and equipment parking, and material storage. The yard may also have construction trailers for supervisory and clerical personnel. Staging yards would include the installation of temporary perimeter fencing and may be lit for staging and security. Typically, each yard would be approximately 0.2 to 5 acres in size, depending on land availability and intended use. Preparation of the staging yard would include temporary perimeter fencing and depending on existing ground conditions at the site, grubbing and/or grading may be required to provide a plane and dense surface for the application of gravel or crushed rock. In addition, temporary construction work areas for crews and where project related equipment and/or materials are placed will be located at or near each pole location as the work progresses, ranging in size from approximately 0.2 to 5 acres. At the completion of construction activities, construction laydown areas would be restored to preconstruction conditions.

Access Roads and/or Spur Roads

Subtransmission line roads are classified into two groups; access roads and spur roads. Access roads are through roads that run between tower sites along a ROW and serve as the main transportation route along line ROWs. Spur roads are roads that lead from access roads and terminate at one or more structure sites. Construction and operation and maintenance crews would employ a network of existing roads. The typical subtransmission access road consists of a network of dirt roads accessed from paved public and private roads. No new access roads, and few new permanent spur roads, will be developed as part of the Project. Where road access is limited or there are environmental constraints to accessing the project area with standard construction vehicles, primarily along Segment 3, construction activities will be supported by the use of helicopters.

Helicopter Access

Helicopters would be used to support construction activities in Segments 2 and 3. Helicopter use supporting construction may include, but is not limited to areas where access is limited (e.g., no suitable access or spur road, limited construction area to facilitate on-site construction activities, and/or there are environmental constraints to accessing the project area with standard construction vehicles and equipment) or where system outage constraints are a factor.

Cleanup and Post Construction Restoration

SCE would clean up all areas that would be temporarily disturbed by construction of the Project (which may include the staging yards, construction work areas, and stringing sites, among others) to as close to pre-construction conditions as feasible, or to the conditions agreed upon between the landowner and SCE following the completion of construction of the Project. If restoration and/or revegetation occurs within sensitive habitats, a habitat restoration and/or revegetation plan(s) would be developed by SCE with the appropriate resource agencies and implemented after construction is complete.

3.4 Impact Analysis

3.4.1 Visual Simulations and Visual Change

The set of visual simulations presented on Figures 4 through 8, documents the Project-related visual change that would occur at five KOPs, and provides the basis for evaluating potential visual effects associated with the Project from these key public views. A qualitative evaluation of potential visual effects considered factors such as the extent of change to the visibility of existing power lines, the degree to which the various project elements will contrast with or be integrated into the existing landscape, the extent of change in the landscape's composition and character; the number and sensitivity of viewers, and general project consistency with respective BLM and USFS visual management goals as outlined in Section 2.2.

The methodology employed for preparing the simulations includes systematic site photography, computer modeling, and digital rendering techniques. Photographs were taken using a digital single-lens reflex (SLR) camera with standard 50-millimeter lens equivalent, which represents an approximately 40-degree horizontal view angle. Photography viewpoint locations were documented in the field using photo log sheet notation, global positioning system (GPS) recording, and basemap annotation. Digital aerial photographs and project design information

supplied by SCE and Arcadis provided the basis for developing three–dimensional computer modeling of the new project components. For each simulation viewpoint, viewer location was input from global positioning system data using 5 feet as the assumed eye level. Computer "wireframe" perspective plots were overlaid on the simulation photographs to verify scale and viewpoint location. Digital visual simulation images were then produced based on computer renderings of the three-dimensional modeling combined with selected digital site photographs. The simulations presented on Figures 4 through 8 consist of two full-page images designated "a" and "b," with the existing views shown in the "a" figure and the after visual simulations in the "b" figure.

This section includes description of the project-related change and an evaluation of potential visual effects on key public views, primarily as represented by the set of five KOP visual simulations. Table 7: Summary of Visual Effects at Key Viewpoints, presents an overview including viewpoint location with corresponding visual sensitivity factor(s); approximate viewing distance; and summary of visible change and potential effect that would occur at each KOP location. As summarized in Table 7 and detailed under discussion of the two Landscape Units, the visual change associated with Project modifications would not substantially alter existing visual conditions in the Project area.

Table 7: Summary of Visual Change at KOPs

Photograph number and Location ***(Figure number)***	**Visual Sensitivity Factor(s)**	**Viewing Distance**	**Visual Change and Effect**
LANDSCAPE UNIT 1			
9. Silver Canyon Road at Laws Railroad Museum looking west ***(Figure 4)***	Proximity to California Historical Landmark Proximity to recreational facility	100 feet	Permanent removal of subtransmission structures along roadway edge. Reduction in height of existing wood pole in immediate foreground. Removal of subtransmission structures represents an incremental improvement to the visual character of landscape in this area.
10. Laws Railroad Museum looking east ***(Figure 5)***	Proximity to California Historical Landmark Proximity to recreational facility	250 feet	Taller DI poles replace existing wood poles. Increased distance between poles results in fewer subtransmission structures visible in landscape. Increased height of replacement poles does not significantly alter views of White Mountains in backdrop, and overall change would not substantially affect existing view.
LANDSCAPE UNIT 2			

Photograph number and Location *(Figure number)*	Visual Sensitivity Factor(s)	Viewing Distance	Visual Change and Effect
11. Silver Canyon Road at Inyo National Forest looking east ***(Figure 6)***	High USFS SIO classification	350 feet	A single alignment of somewhat taller replacement DI poles replaces two existing parallel alignments of wood poles resulting in fewer visible subtransmission structures overall. Incremental increase in visibility of some new structures when seen against landscape backdrop in particular lighting conditions. Overall change would not substantially affect existing view from roadway.
18. White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road looking north ***(Figure 7)***	High USFS SIO Classification Ancient Bristlecone Scenic Byway	<500 feet	Single alignment of incrementally taller DI poles replaces two existing parallel alignments of wood poles resulting in fewer visible subtransmission structures overall. Incremental increase in contrast of replacement structures against landscape backdrop compared with existing wood poles, resulting in slight increase in visibility of individual poles in foreground. Overall change would not substantially affect existing view from roadway.
25. Wyman Creek Road near Inyo National Forest boundary looking east ***(Figure 8)***	BLM VRM Class II classification	300 feet	Single alignment of fewer taller DI poles replaces two existing parallel alignments of wood poles. Incremental increase in height of replacement poles does not substantially affect existing view of distant mountain backdrop from roadway. Visual contrast of replacement poles in the landscape similar to existing wood poles.

As outlined in Section 2.1.1, the Project crosses land administered by two federal agencies – the USFS and the BLM. The following discussion is included to address Project consistency with applicable visual resource management policies and objectives of these two agencies.

USFS Scenic Management Objectives

Approximately 19 miles of the Project route crosses land under the jurisdiction of the USFS. This discussion contains an evaluation of the project in light of USFS visual management goals, as expressed in the applicable SIO classifications. As shown on the map presented in Figure 3a, portions of the project cross parts of the Inyo National Forest with Scenic Integrity Objectives (SIO) of Moderate and High. Characteristics of lands with an SIO of Medium and High are described in Table 3 in Section 2.1.1 Regulatory Background. These designations are assigned to areas that are considered to have valued landscape character that “appears intact” or “appears slightly altered”.

A detailed evaluation of visual change associated with Project subtransmission line components provided below and Table 7 summarizes these visual effects. Figure 7 shows the project appearance as seen from a KOP located within Inyo National Forest lands. A comparison of the

existing views and visual simulations shown in Figures 6 and 7 demonstrates that the Project subtransmission line replacement components will not result in a noticeable change in visual contrast with regard to line, form, or color. These simulations also indicate the transmission line components will not result in deviation to the intactness of existing landscape character.

Overall, the project will result in minor, incremental changes that will not affect the intact appearance of the landscape setting within the Inyo National Forest. As outlined above the project-related visual change will be consistent with the USFS visual management goals for the Inyo National Forest.

BLM VRM Classifications

Portions of the Project alignment cross BLM-administered land within the Owens Valley as well as east of the White Mountains. Figure 3b shows the Project with VRM classifications on BLM-administered land and indicates that east of the White Mountains, within Landscape Unit 2, approximately 10 miles of the Project alignment crosses BLM administered land that falls within its VRM Class II designation. As described in Table 3 and discussed in Section 2.1.1 Regulatory Background, the BLM management goals in Class II areas call for retaining the existing landscape character and allow for a low level of change to existing landscape character and any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

Figure 8 shows the project from a KOP at the east edge of Wyman Canyon looking across BLM land with a VRM Class II designation. As described below, comparison of the Figure 8a existing view and the Figure 8b visual simulation indicates the difference in the overall appearance of the new poles, in terms of form, line and color, is incremental, and the introduction of Proposed Project elements does not represent a significant change in the level of visual contrast within the landscape and does not significantly deviate from the existing landscape character. As a result, project related change would be consistent with the BLM Visual Management goals.

3.4.1.1 Landscape Unit 1

Beginning at Control Substation and extending approximately 12 miles across the Owens Valley to the boundary of Inyo National Forest, generally distant views of the Project predominate, with close-range public views of the Project limited to where the Project crosses SR 68 and US 395 and along Silver Canyon Road and the town of Laws near the eastern edge of the Owens Valley.

Figure 4: Visual Simulation: Silver Canyon Road at Laws Railroad Museum (VP 9)

Approximately 3.8 miles northeast of Bishop the project alignment parallel circuits pass through Laws, the site of the open-air Laws Railroad Museum, a California Landmark that is listed on the National Registry of Historic Places. Looking west along Silver Canyon Road, Figure 4a shows a close-range view of a portion of the railroad museum on the left, and wood poles supporting the existing northern segment of the Project alignment adjacent to the right side of the roadway. The poles are seen against the backdrop of sky and the Sierra Nevada mountains. Partially seen against a backdrop of trees, the closest pole supports a steel cobra-head light fixture in addition to distribution and communication cable. Whereas the closest pole is a noticeable element in the foreground, the poles and overhead conductor that recede along the roadway increasingly blend into the landscape background with greater distance from this viewpoint.

In the Figure 4b simulation, the existing wood poles along the roadway have been removed, with the exception of the pole in the immediate foreground. This change is the result of displacement of the existing single circuited alignment from its present location along the roadway edge and its consolidation with a new double circuited line situated approximately 800 feet to the south. The simulation also shows the remaining pole in the foreground is noticeably shorter and has been modified to support only the existing light fixture. A comparison of Figures 4a and 4b demonstrates that the removal of Project structures and the decrease in height of the remaining pole results in an incremental improvement to the visual setting at this location.

Figure 5: Visual Simulation: Laws Railroad Museum (VP10)

Figure 5a, a view looking east approximately 800 feet to the south of the Laws Railroad Museum frontage along Silver Canyon Road, shows the southern segment of the Project alignment traversing the railroad museum site. Historic railroad equipment and several outbuildings along with a Project pole dominate the foreground. Similar to the previous KOP view, Project poles are noticeable against the sky and the lighter hues of mountains in the background; however, as seen from this location, trees partially block views of more distant poles. In addition, various museum yard elements including equipment of similar color to the poles, along with adjacent buildings and trees provide multiple focal points in the foreground.

The Figure 5b simulation shows the existing wood Project poles replaced by a smaller number of taller DI poles. The existing Project structure in the immediate foreground seen in Figure 5a along with multiple wood poles visible beyond have been permanently removed. In addition to the replacement poles being somewhat taller, the simulation shows their updated structure design with multiple horizontal insulators that extend directly from the pole, thus eliminating the need for crossarms. Although the replacement poles appear somewhat darker compared to the weathered wood poles that have been removed, the medium-dark brown color of the new structures, most noticeably in the case of the poles seen in the foreground is compatible with the appearance and texture of the machinery and structures seen within the museum yard. A comparison of Figures 5a and 5b demonstrates that the overall form and appearance of the new poles does not fundamentally deviate from existing structures being replaced and the increased height of the new poles would not substantially alter the general visibility of the Project in relation to the landscape backdrop. and as shown in the Figure 5b visual simulation, the permanent removal of approximately half of the existing Project structures would represent an incremental improvement to the visual setting. In light of changes described above, the introduction of the new replacement poles represents an incremental effect that would not result in a substantial change in the existing landscape character.

3.4.1.2 Landscape Unit 2

Within Landscape Unit 2, the alignment traverses the Inyo National Forest and crosses the rugged, largely uninhabited and for the most part sparsely forested White Mountains, where it generally parallels unpaved access roads in an area of varied topography and vegetation. In this environment, open, long-range views of the Project alignment are limited to locations near the almost treeless summit of the White Mountains. Visibility of Project elements is also influenced by the variations in backdrop topography as well as daylight conditions where access routes pass through relatively narrow canyons.

Figure 6: Visual Simulation: Silver Canyon Road at Inyo National Forest (VP 11)
Figure 6a is a view looking east near the lower entrance to Silver Canyon. Taken along Silver Canyon Road, a limited vehicle access gravel track that closely parallels the Project alignment, the photograph shows parallel arrays of existing wood Project poles receding into the distance along the left side of the roadway. The degree of the poles' visibility varies depending on the backdrop. Many of the weathered wood poles blend in with the light sandy terrain visible above the road to the left, while the tops of several poles in the foreground are somewhat more noticeable when seen against the darker terrain that characterizes the more distant backdrop.

The Figure 6b simulation shows taller DI poles having replaced the existing wood Project poles that were closest to the roadway edge. The design of these replacement poles includes a tiered array of light colored, roughly horizontal insulators which differ from the single wood crossarm supporting the paired vertical insulators seen on the existing wood poles. The simulation also depicts the permanent removal of the parallel set of existing wood poles that were to the left. A comparison of Figures 6a and 6b demonstrates that the increased height of the new poles would not alter the overall visibility of the Project in relation to the landscape backdrop. Although the more uniform, darker color of the new poles seen in the Figure 6b simulation contrasts more readily with the landscape backdrop in the foreground, the level of contrast diminishes when seen against the darker terrain in the distance. At the same time, the medium-dark brown color of the new structures is similar to and compatible with the informational sign seen in the immediate foreground as well as with the dark colored outcrops within the surrounding terrain. In this respect the Project does not generally deviate from the overall color and texture of the surrounding landscape. Moreover, the permanent removal of approximately half of the existing Project structures would represent an incremental improvement to the visual setting. Overall the changes described above including the introduction of the new replacement poles and the permanent removal of the parallel set of existing wood poles represents an incremental effect that would not result in a substantial change in the existing landscape character.

Figure 7: Visual Simulation: White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road (VP 18)
Figure 7a shows an open, and slightly elevated view along the alignment from the junction of White Mountain Road (part of the Ancient Bristlecone Scenic Byway) and Wyman Canyon Road. Parallel arrays of wood Project poles traverse the rolling topography of the summit, along with part of a nearby distribution alignment supported by shorter wood poles including one seen in the foreground. Although a limited number of poles could be seen at close range where the alignment crosses this unpaved roadway (refer to Photograph 17 on Figure 2i, taken approximately 620 feet east of the Figure 7 viewpoint), from this location Project poles are generally seen within the context of an expansive landscape that includes a backdrop of the surrounding White Mountain terrain. As shown on Figure 7a, under these typical viewing conditions, Project poles are not particularly noticeable elements, due to their slender profile and small scale relative to the overall composition of the surrounding landscape.

The Figure 7b simulation shows the two parallel sets of weathered wood poles have been removed and replaced with a single line of taller DI poles adjacent to Wyman Creek Road seen in the left center of the view. The overall shape of the new poles is similar to those being replaced, and is also similar to the existing wood poles that remain in the foreground, while the color of the new poles is similar to the medium-dark brown informational signs seen along the

roadway. A comparison of Figures 7a and Figure 7b shows that the Project results in fewer visible subtransmission structures due to the consolidation of the parallel lines into a single alignment. Although the replacement poles are taller and appear somewhat darker in color than the poles being replaced, when seen against the mottled backdrop of mountain terrain, the increased contrast is not pronounced, and is barely perceptible with increasing distance from the viewpoint. As a result, the introduction of the new poles combined with the reduction in the total number of visible Project structures represents an incremental change that does not substantially alter the visual setting in this location.

Figure 8: Visual Simulation: Wyman Creek Road near Inyo National Forest boundary (VP 25)

Figure 8a shows the open, panoramic landscape of Deep Springs Valley, as seen along Wyman Creek Road looking east. In this view, multiple poles that support the two existing parallel Project alignments can be seen at relatively close range and are noticeable features in the landscape, due to the contrast between their vertical profile in relationship to the predominantly horizontal orientation of landscape features, as well as contrast of their darker color against the lighter uniform texture of the distant valley floor and backdrop of the Inyo Mountains.

The Figure 8b simulation shows four, taller DI poles supporting a single, double-circuited alignment, having replaced eight existing wood poles of the existing parallel alignments. In place of single crossarms with vertical insulators characteristic of the existing wood poles shown in Figure 8a, insulators are directly attached to the new poles. As shown in the simulation, this change, along with the increased height and somewhat darker color of the new poles is most apparent in the close-range view of the structure visible in the immediate foreground, which is more noticeable in part, because the top of this structure along with overhead conductor is silhouetted against the sky above the distant mountain backdrop. The simulation also shows, however, that with increasing distance, the replacement structures' visibility is diminished due to weaker contrast with the texture and color of the landscape backdrop. Comparison of the Figure 8a and 8b existing and simulation views indicates that differences in the overall appearance between the existing poles and new poles is an incremental change in terms of form and color, and in combination with the overall reduction in the number of visible structures, the effect does not represent a significant change in the level of contrast and intactness within the landscape. Therefore the introduction of the new poles represents an incremental effect that would not result in a substantial change in the existing landscape character at this location.

3.4.2 CEQA

Would the Project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Measures	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	❒	❒	☑	❒

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	❒	❒	☑	❒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	❒	❒	☑	❒
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	❒	❒	☑	❒

3.4.2.1 Question 4.4a- Scenic Vista Effects - Less-than-Significant Impact

Construction – Less than Significant Impact

For the purpose of this evaluation, a scenic vista is defined as a distant public view along or through an opening or corridor that is recognized and valued for its scenic quality. An established scenic overlook is located along a paved segment of White Mountain Road, part of the Ancient Bristlecone Scenic Byway, approximately 2 miles south of the Ancient Bristlecone Visitor Center, which constitutes the gateway for recreational visitors to the White Mountains. Located approximately 3.6 miles south of the alignment, the Project is not visible from this scenic overlook due to intervening topography. White Mountain overlook, an informal pullout adjacent to White Mountain substation approximately 3 miles north of the visitor center along an unpaved portion of White Mountain Road, affords recreational motorists and hikers views of the Owens Valley and Sierra Nevada Mountains and includes a view of Project elements near the top of Silver Canyon. As shown in Photo 15 (Figure 2h), a view from Silver Canyon Road near the White Mountain overlook, a number of existing wood poles can be seen below a scattered stand of trees. The tops of the poles are well below the summit of the more distant south canyon wall. The replacement of existing wood poles with new, somewhat taller DI replacement poles of similar form will represent a minor change to the view toward the Project alignment, and the increased pole height will not obstruct the expansive distant landscape views that are currently available from the overlook. As a result, the Project will not substantially affect the existing visual character or quality of this view and potential impacts to this scenic vista will be less than significant.

Operations – No Impact

Operation and Maintenance (O&M) activities required for the rebuilt power lines will not change from those currently required for the existing system; thus, no operation-related impacts to a scenic vista would occur.

3.4.2.2 Question 4.4b– Scenic Resource Damage within a State Scenic Highway- Less than Significant Impact

Construction – Less than Significant Impact

As outlined in Section 2.2.2 and Table 3 and shown on Figure 1, within the Project area a portion of SR-168 located west of Bishop is a designated State Scenic Highway. Within this segment of the proposed Project no subtransmission poles will be removed and replaced; therefore no change to scenic resources within this roadway corridor would occur and there would be no impact.

Table 3 notes that portions of the Proposed Project will also be visible from three eligible State Scenic Highways including portions of US 395, SR-168 and SR-266. Photographs 5 and 6 (Figure 2c), two views taken from the segment of US-395 that is an eligible State Scenic Highway where the Project crosses the highway north of Bishop (Figure 4.1-2c), show that steel poles on either side of the highway are similar in form to Project replacement poles. As noted above, no Project poles will be replaced in Segment 1 south of US 395. North of US 395 the existing wood poles will be replaced with fewer, more widely spaced, poles. These changes would be minor and incremental and it is therefore expected that there would not be a substantial effect on motorists' views from the eligible State Scenic Highway portion of US 395. The Project also parallels an eligible State Scenic Highway section of SR-168 east of the White Mountains (Figure 1), where the overall visibility of the Proposed Project would be reduced as a result of the permanent removal of all poles within one of the two existing alignments and the replacement of poles within the remaining alignment with more widely spaced structures. This includes the permanent elimination from view of previously visible Project elements along an approximately 1.8 mile-long portion of the highway. Similarly, where the Project crosses SR-266 in Fish Lake Valley, a single subtransmission alignment will replace existing parallel wood pole lines, with fewer new structures more widely spaced compared to the existing poles.

As documented in Sections 2.1.5 and 2.2.1 and on Table 3, a portion of the Ancient Bristlecone Scenic Byway, part of the National Scenic Byway Program under the jurisdiction of the USDA, passes through the Project area, and is used by regional recreational travelers to the area as well as local off-road enthusiasts. Beginning on the outskirts of Bishop in the Owens Valley at the junction of US 395 and SR-168, this roadway climbs through Pinyon Pine-Juniper woodlands within the Inyo National Forest and continues along White Mountain Road to the summit of the White Mountains where it terminates at Patriarch Grove of ancient Bristlecone pines. Photograph 17 (Figure 2i) shows a portion of the Project at the first of two locations where it crosses an unpaved portion of White Mountain Road near the summit. In this west facing view, existing dark wood poles are visible against the lighter sky backdrop where the existing parallel Project alignments traverse a low ridge. In this location, taller DI poles would replace wood poles along the alignment located nearest the viewpoint, and poles in the adjacent parallel alignment would be permanently removed. Approximately similar in form to the existing poles, it is expected that the increased height of the new poles, when viewed against a predominantly sky backdrop, would be an incremental change and would not negatively affect views of surrounding landscape features. The effect of backdrop conditions on Project visibility is further documented in the discussion of Figure 7a and 7b before and after comparison in a view of the Project from White Mountain Road taken a short distance to the north. As demonstrated by the Figure 7b visual simulation in Section 3.1.1, visual change resulting from introduction of new Project elements

would not be particularly discernible within the context of the surrounding landscape, and therefore the Project would not substantially damage scenic resources within this scenic roadway corridor. Taken together, the incremental effects described above would not result in damage to existing scenic resources along a State Scenic Highway. Therefore, the impact is less than significant.

Operations – No Impact

Operation and Maintenance (O&M) activities required for the rebuilt power lines will not change from those currently required for the existing system; thus, no operation-related impacts to existing scenic resources within a State Scenic Highway corridor would occur.

3.4.2.3 Question 4.4c– Visual Character Degradation

Construction – Less-than-Significant Impact

Construction-related visual impacts resulting from the temporary presence of equipment, materials, and work crews along the Project alignment, staging and work areas, and stringing sites would not substantially degrade the existing visual character of the landscape. To varying degrees, construction activity will be noticeable to a small number of local residents in the town of Laws, as well as some motorists and recreational visitors. Construction activities will take place over an approximately 33-month period, but this will be considerably shorter in duration at any one location.

Trees or portions of trees that encroach on existing access and spur roads along upper Silver Canyon and portions of Wyman Canyon may be trimmed or removed to facilitate the safe movement of construction equipment. Similarly, trees or portions of trees within or adjacent to stringing sites, construction laydown areas, construction work areas, staging yards, and helicopter landing zones may be trimmed or removed to permit the safe operation of construction equipment; however, these areas will be preferentially selected to minimize the trimming or removal of trees. If restoration and/or revegetation occurs within sensitive habitats, a habitat restoration and/or revegetation plan(s) would be developed by SCE with the appropriate resource agencies and implemented after construction is complete. In general, the visual effects of vegetation removal will be minor and not noticeable to the public and the impact would be less than significant. The less-than-significant impact will be further reduced by implementation of APM-AES-2, which calls for only the minimum amount of vegetation necessary for the safe construction, and operation of structures and facilities to be removed.

During construction, migration of fugitive dust from the construction sites would be limited by control measures set forth by regional air quality management districts; these measures may include the use of water trucks and other dust control measures. Minor disturbance of land within and along the project alignments will occur as a result installing replacement poles and removing existing structures. In addition, minor land disturbance may occur at some of the temporary staging and work areas that will be established as part of the project construction; these areas will generally be located on disturbed land located near or on existing project alignments. A limited degree of visual contrast could occur as a result of land disturbance activity such as creation of newly exposed soil areas; however, because SCE would restore all areas that would be temporarily disturbed by construction including locations where structures are removed, staging yards, construction work areas, and stringing sites, among others to as close to pre-construction

conditions as feasible, or to the conditions agreed upon between the landowner and SCE following the completion of construction of the Project, the effect would be minimized so that the disturbed areas will blend in with the surrounding landscape setting, thus reducing visual contrast and potential visibility of these areas. As a result, any visual character degradation resulting from temporary construction activity would be less than significant.

The Project would result in incremental permanent visual change that would not substantially alter or degrade the existing visual character in the area. The Project includes replacing or modifying existing subtransmission facilities along approximately 41 miles of existing utility ROWs within three discrete segments that are located in rural, sparsely populated portions of Inyo and Mono County.

These activities would primarily occur within and/or immediately adjacent to an approximately 38 mile-long section of an existing subtransmission alignment (Segment 3) and would entail replacing two single- circuit subtransmission lines supported by 1,565 wood poles with a single double-circuit subtransmission line consisting of approximately 697 structures that would include a combination of DI poles, TSPs, TSP H-Frame structures, and LWS poles. Additionally, a 1.35 mile-long section of existing parallel single-circuited subtransmission lines supported by 49 wood poles (Segment 2) would be replaced by parallel single circuited subtransmission lines consisting of 22 DI poles and 3 TSPs, and along a portion of a 2.5 mile- long segment of existing single circuited, wood-pole supported subtransmission line (Segment 5), 8 existing wood poles would be replaced with 8 DI poles. In Segments 2 and 3, existing conductor would be replaced with new non-specular conductor and OPGW. Marker balls may be installed on overhead wire at locations where determined necessary.

Within the northern Owens Valley (Landscape Unit 1), close-range public views of the Proposed Project would be available in a limited number of locations including US 395, where the Project crosses the highway approximately 3.5 miles northwest of Bishop, and SR-6, crossed by the Project approximately 2.5 miles northeast of Bishop. The Project alignment also passes within approximately 0.5 mile of a small number of residences along Bishop's northern perimeter, and skirts the Laws Railroad Museum, a recreational facility east of Bishop. In these locations, new Project components will be seen within the context of existing utility infrastructure that includes adjacent power alignments and distribution lines. In many instances within this area the surrounding or backdrop landforms and vegetation, combined with the effect of distance would diminish the visibility of Proposed Project components. Additionally, Project subtransmission line replacement will result in a net reduction in the total number of visible structures due to approximately doubling the distance between replacement poles along Segment 2 and approximately 14 miles of Segment 3, and the consolidation of two single-circuit alignments into one double circuited line along the entire length of Segment 3. Figures 4 and 5 showing existing and post-Project views as seen from two KOPs within Landscape Unit 1 portray views from within the town of Laws, a sensitive location in proximity to a California Historical Landmark. As discussed in Section 3.1.1 and outlined on Table 7, the simulations demonstrate that the incremental change associated with the Project would not substantially alter or degrade existing landscape or visual character in the area.

In Landscape Unit 2, the Project alignment primarily traverses largely uninhabited portions of Inyo National Forest and BLM land. To varying degrees, proposed Project components will be visible from locations within Deep Springs Valley and over Gilbert Summit along SR-168 east of

the White Mountains, as well as publicly-accessible unpaved off-road tracks and public recreation areas. Figures 6 through 8 are pairs of existing and post-project views from KOP locations within the Inyo National Forest near White Mountain summit and near the BLM/Forest Service boundary east of the summit, respectively. This set of figures demonstrates that intervening landforms partially or fully screen Project elements from all but a limited number of viewers in this area, and similar to instances in Landscape Unit 1, where more open views are available, the level of Project visibility is diminished due to backdrop conditions and viewing distance. Moreover, the permanent removal of approximately half of the existing Project structures in this area would represent an incremental improvement to the visual setting. East of the White Mountains the Project parallels a section of SR-168 that is an eligible State Scenic Highway, where the overall visibility of the Proposed Project would be reduced as a result of the permanent removal of all poles within one of the two existing alignments including the permanent elimination from view of previously visible Project elements along an approximately 1.8 mile-long portion of the highway. Replacement of existing poles within the remaining alignment would include fewer, more widely spaced, taller structures. Similarly, where the Project crosses SR-266 in Fish Lake Valley, a single subtransmission alignment will replace two existing parallel wood pole lines, with fewer new structures more widely spaced compared to the existing poles. In light of the changes outlined above and summarized in Table 7 as well as demonstrated by the set of visual simulations from the five KOPs presented on Figures 4 through 8, the Project would result in incremental visual change that will not substantially alter or degrade existing visual character or quality in the area. Therefore the impact would be less than significant.

Operations - No Impact. Operation activities required for the rebuilt power lines will not change from those currently required for the existing system; thus, no operation-related impacts to aesthetic conditions would occur.

3.4.2.4 Question 4.4d) New Light or Glare

Construction – Less-than-Significant Impact

Most construction will take place during daylight hours; however, at limited times some construction along the project alignment may be required or finished at night, and these activities will require lighting for safety. Any required lighting would be limited to an individual work area and would be temporary in nature. Staging yards may be lit for staging and security; and lighting would be directed on site and away from potentially sensitive receptors. Non-specular conductors and non reflective insulators, and dulled replacement structures will replace existing components thus reducing potential glare (refer to APM AES-1). Therefore, the Project will not result in a substantial light or glare effect and the impact would be less than significant.

Operations – No Impact

No new permanent lighting is proposed for the Project. Operation activities required for the rebuilt power lines will not change from those currently required for the existing system; thus, no operation-related impacts to day or nighttime conditions would occur.

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Hammill Valley
Zack Substation
Chalfant Valley
Fish Slough
Owens River
Bishop
Bishop Paiute Reservation
Control Substation
Laws
Silver Canyon
White Mountain Substation
Inyo National Forest
Mono County
Inyo County
Wyman Canyon
Gilbert Summit
Deep Springs Substation
White Mountain Road (Ancient Bristlecone Scenic Byway)
Deep Springs Valley
Inyo Mountains
Fish Lake Valley
Sierra Nevada Mountains
Owens Valley
White Mountains
Landscape Unit 1
Landscape Unit 2
NEVADA
CALIFORNIA
Dyer
Las Vegas
San Francisco
Los Angeles

Legend

- Control-Silver Peak Project Alignment
  - Segment 1
  - Segment 2
  - Segment 3
  - Segment 4
  - Segment 5
- National Scenic Byway
- Designated State Scenic Highway
- Eligible State Scenic Highway
- Key Viewpoint Location and Direction
- Photograph Viewpoint Location and Direction
- Landscape Unit

N

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Miles

ENVIRONMENTAL VISION

IMAGERY SOURCE: ESRI 2019

CONTROL-SILVER PEAK PROJECT

PHOTOGRAPH VIEWPOINT LOCATIONS

ARCADIS | SOUTHERN CALIFORNIA EDISON An EDISON INTERNATIONAL Company

FIGURE 1

101819

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1. SR-168 looking east

2. SR-168 looking southeast towards Control Substation

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2a

ENVIRONMENTAL VISION

101819

3. Bishop Creek Battleground Historic Marker near SR-168 looking west

4. Rocking K Road at Ed Powers Road looking east

Refer to Figure 1 for photograph viewpoint locations

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REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2b

ENVIRONMENTAL VISION

101819

5. US 395 looking west

6. US 395 looking east

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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SOUTHERN CALIFORNIA EDISON

FIGURE: 2c

ENVIRONMENTAL VISION

101819

7. Saniger Lane at Dixon Lane looking north

8. SR-6 looking north

Refer to Figure 1 for photograph viewpoint locations

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REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2d

ENVIRONMENTAL VISION

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*9. Silver Canyon Road at Laws Railroad Museum looking west

*10. Laws Railroad Museum looking east

Refer to Figure 1 for photograph viewpoint locations
* Key viewpoints; see Figures 4 and 5 for visual simulations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2e

ENVIRONMENTAL VISION

101819

11*. Silver Canyon Road at Inyo National Forest boundary looking east

12. Silver Canyon Road in lower canyon looking east

Refer to Figure 1 for photograph viewpoint locations
* Key viewpoint; see Figure 6 for visual simulation

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REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2f

ENVIRONMENTAL VISION

101819

13. Silver Canyon Road in upper canyon looking west

14. Silver Canyon Road near high point looking north

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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SOUTHERN CALIFORNIA EDISON

FIGURE: 2g

ENVIRONMENTAL VISION

101819

15. Silver Canyon Road near White Mountain overlook looking southwest

16. Silver Canyon Road near White Mountain Substation looking northeast

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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EDISON

FIGURE: 2h

ENVIRONMENTAL VISION

101819

17. White Mountain Road (Ancient Bristlecone Scenic Byway) looking west

*18. White Mountain Road (Ancient Bristlecone Scenic Byway) at Wyman Creek Road looking north

Refer to Figure 1 for photograph viewpoint locations
* Key viewpoint; see Figure 7 for visual simulation

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2i

ENVIRONMENTAL VISION

101819

19. Wyman Creek Road at historic cabin looking west

20. Wyman Creek Road in upper canyon looking east

Refer to Figure 1 for photograph viewpoint locations

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REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2j

ENVIRONMENTAL VISION

101819

21. Wyman Creek Road in middle of canyon looking east

22. Wyman Creek Road near Roberts Ranch looking east

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

ARCADIS

SOUTHERN CALIFORNIA EDISON

FIGURE: 2k

ENVIRONMENTAL VISION

101819

23. Wyman Creek Road in lower canyon looking northwest

24. Wyman Creek Road at Inyo National Forest boundary looking west

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

ARCADIS

SOUTHERN CALIFORNIA EDISON

FIGURE: 2I

ENVIRONMENTAL VISION

101819

*25. Wyman Creek Road near Inyo National Forest boundary looking east

26. Wyman Creek Road in Deep Springs Valley looking east

Refer to Figure 1 for photograph viewpoint locations
* Key viewpoint; see Figure 8 for visual simulation

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

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FIGURE: 2m

ENVIRONMENTAL VISION

101819

27. SR-168 looking southwest

28. SR-168 east of Gilbert Summit looking northeast

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

ARCADIS SOUTHERN CALIFORNIA EDISON

FIGURE: 2n

ENVIRONMENTAL VISION

101819

29. SR-168 looking northeast

30. SR-266 looking northeast towards Fish Lake Valley Substation

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

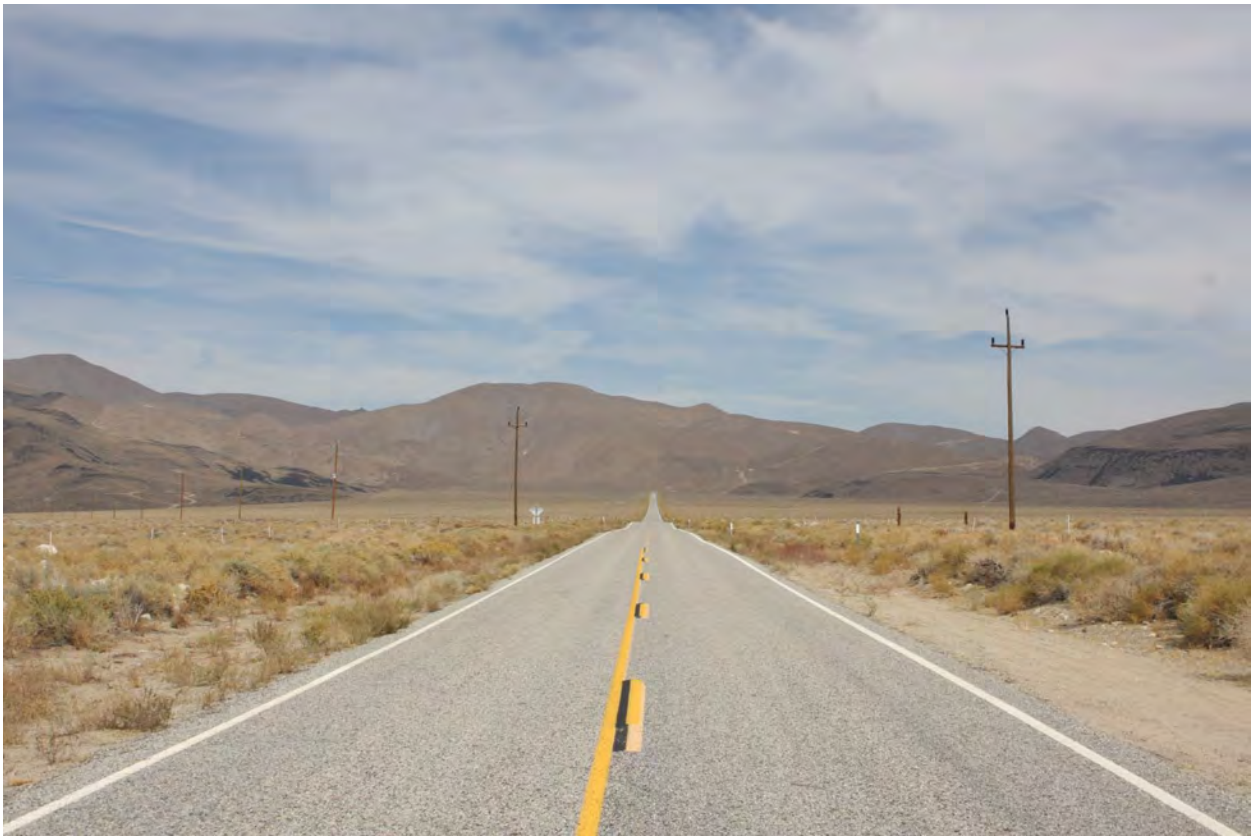
ARCADIS

SOUTHERN CALIFORNIA EDISON

FIGURE: 2o

ENVIRONMENTAL VISION

101819



31. SR-168 near Deep Springs College looking northeast

32. Deep Springs College entry road looking east

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

REPRESENTATIVE PHOTOGRAPHS

ARCADIS | SOUTHERN CALIFORNIA EDISON

FIGURE: 2p

ENVIRONMENTAL VISION

101819

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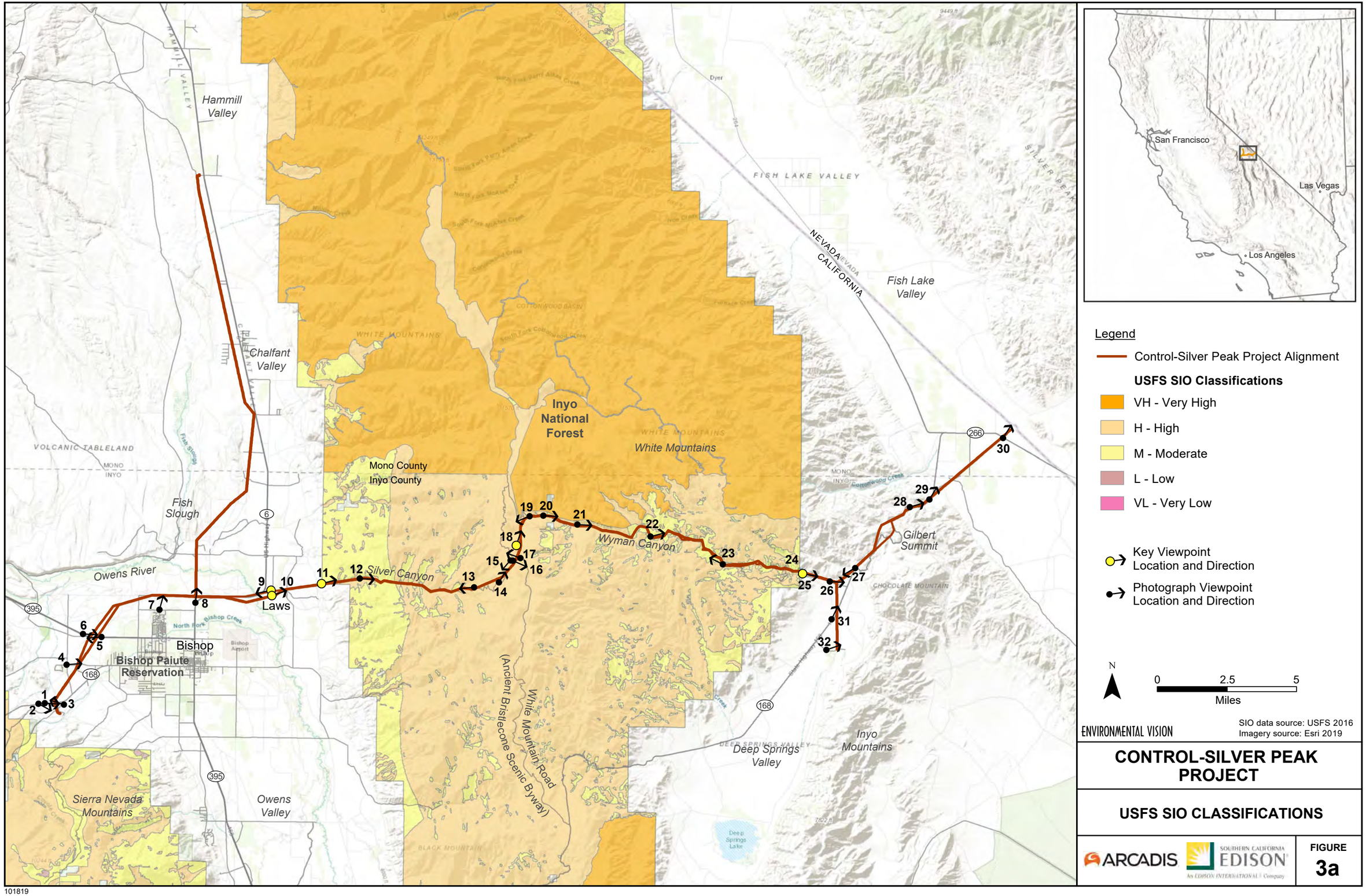

Legend

- Control-Silver Peak Project Alignment

USFS SIO Classifications

- VH - Very High
- H - High
- M - Moderate
- L - Low
- VL - Very Low

- Key Viewpoint Location and Direction
- Photograph Viewpoint Location and Direction

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Miles

ENVIRONMENTAL VISION

SIO data source: USFS 2016
Imagery source: Esri 2019

CONTROL-SILVER PEAK PROJECT

USFS SIO CLASSIFICATIONS

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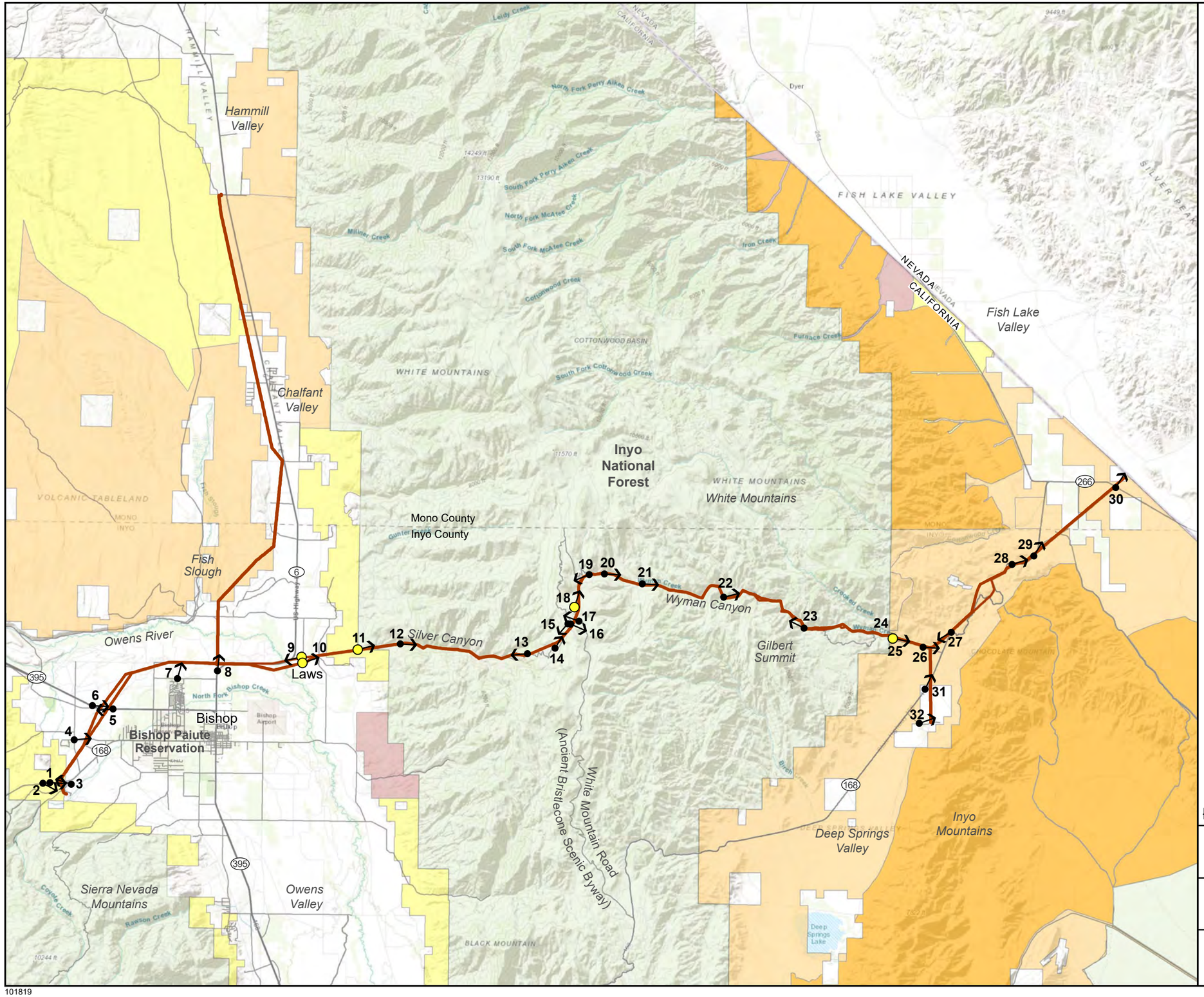
FIGURE 3a

101819

Privileged and Confidential



Legend

Control-Silver Peak Project Alignment

BLM VRM Classifications

- Class I
- Class II
- Class III
- Class IV

Key Viewpoint Location and Direction

Photograph Viewpoint Location and Direction

N

0 2.5 5

Miles

VRM data source: BLM 2016, 1993
Imagery source: Esri 2019

ENVIRONMENTAL VISION

CONTROL-SILVER PEAK PROJECT

BLM VRM CLASSIFICATIONS

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FIGURE 3b

101819

Existing View from Silver Canyon Road at Laws Railroad Museum (VP 9)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

EXISTING VIEW -- SILVER CANYON ROAD AT LAWS RAILROAD MUSEUM

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FIGURE: 4a

ENVIRONMENTAL VISION

101819

Visual Simulation of Proposed Project (VP 9)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

VISUAL SIMULATION -- SILVER CANYON ROAD AT LAWS RAILROAD MUSEUM

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FIGURE:
4b

ENVIRONMENTAL VISION

101819

Existing View from Laws Railroad Museum (VP 10)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

EXISTING VIEW -- LAWS RAILROAD MUSEUM

ARCADIS

Southern California Edison

FIGURE: 5a

ENVIRONMENTAL VISION

101819

Visual Simulation of Proposed Project (VP 10)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

VISUAL SIMULATION -- LAWS RAILROAD MUSEUM

ARCADIS

EDISON

FIGURE: 5b

ENVIRONMENTAL VISION

101819

Existing View from Silver Canyon Road at Inyo National Forest (VP 11)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

EXISTING VIEW -- SILVER CANYON ROAD AT INYO NATIONAL FOREST

ARCADIS

SOUTHERN CALIFORNIA EDISON

FIGURE: 6a

ENVIRONMENTAL VISION

101819

Visual Simulation of Proposed Project (VP 11)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

VISUAL SIMULATION -- SILVER CANYON ROAD AT INYO NATIONAL FOREST

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FIGURE: 6b

ENVIRONMENTAL VISION

101819

Existing View from White Mountain Road at Wyman Creek Road (VP 18)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

EXISTING VIEW -- WHITE MOUNTAIN ROAD AT WYMAN CREEK ROAD

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FIGURE: 7a

ENVIRONMENTAL VISION

101819

Visual Simulation of Proposed Project (VP 18)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

VISUAL SIMULATION -- WHITE MOUNTAIN ROAD AT WYMAN CREEK ROAD

ARCADIS | SOUTHERN CALIFORNIA EDISON

FIGURE: 7b

ENVIRONMENTAL VISION

101819

Existing View from Wyman Creek Road near Inyo NF (VP 25)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

EXISTING VIEW -- WYMAN CREEK ROAD NEAR INYO NATIONAL FOREST

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FIGURE: 8a

ENVIRONMENTAL VISION

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Visual Simulation of Proposed Project (VP 25)

Refer to Figure 1 for photograph viewpoint locations

CONTROL-SILVER PEAK PROJECT

VISUAL SIMULATION -- WYMAN CREEK ROAD NEAR INYO NATIONAL FOREST

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FIGURE: 8b

ENVIRONMENTAL VISION

101819

APPENDIX A

Description of Existing Views presented on Figure 2: Representative Photographs

Photographs 1 through **3** are three views looking toward the western end of the Project alignment, taken near Control Substation from SR-168 (Photographs 1 and 2) and the Bishop Creek Battleground Historic Marker (Photograph 3). **Photograph 1** is an eastbound motorist's view taken near the western edge of Owens Valley, where SR-168 emerges from the foothills and descends toward Bishop, situated approximately 5 miles away. An array of wood utility structures supporting several adjacent power alignments can be seen on both sides of the roadway. In the immediate foreground the dark wood poles appear prominent against the lighter backdrop of the White Mountains and sky visible across the valley to the east, whereas the project poles seen in the mid-foreground are somewhat less noticeable against the valley floor in the backdrop due to greater viewing distance and weaker contrast. **Photograph 2**, a motorist's view looking southeast from the same location, also demonstrates the influence of viewing distance, background color and texture with respect to the visibility of Project elements. In this case, the Project structures are barely visible against the darker terrain of the foothills on the opposite side of the Owens Valley compared to the closer and more noticeable poles seen against the lighter colored desert landscape. Taken from the Bishop Creek Battleground Historic Marker near SR-168, **Photograph 3** is a view looking west along rising terrain toward distant landforms that shows project poles can be seen beyond the H-frame structures of an adjacent power alignment. A vehicle traveling along SR-168 is visible to the left of the historical stone marker seen in the immediate foreground. Atmospheric haze and relatively bright backlighting tend to accentuate contrast and visibility of the utility structures seen in this view.

From the SR-168 crossing, the Project alignment continues northeast, crossing Red Hill Road within approximately 0.4 mile of a residential subdivision located near Bishop's western edge. **Photograph 4** is a view from the northeastern edge of this subdivision taken along Rocking K Road, which is an extension of Red Hill Road. Taken adjacent to a residential property, this view shows prominent structures of adjacent power lines with overhead conductors in the foreground, including multiple wood poles on the right side of the road and two larger steel lattice structures on the left that are partially silhouetted against the sky and against the distant White Mountains. Near the center of this view three wood Project poles are somewhat discernible where the alignment crosses the roadway; however, the Project alignment is largely screened by a dense stand of trees at the intersection in the foreground.

From Red Hill Road the parallel circuits within the Control-Silver Peak alignment begin to diverge from approximately 80 feet apart to approximately 0.25 mile apart where the alignment crosses US 395, at the northwestern approach to Bishop. **Photographs 5** and **6** respectively show westbound and eastbound motorist's perspectives of the Project at the highway crossing, depicting close-range and somewhat more distant views of Project components. Project structures situated immediately adjacent to the highway corridor are galvanized (gray) steel structures whereas the other poles supporting the alignment including those seen to the left in both photographs are wood. Additionally, the gray steel Project poles adjacent to the roadway are somewhat taller than the wood Project poles. Although the viewing distance is similar, these two photographs show different visual conditions with respect to lighting and atmospheric conditions, as well as the color, texture and scale of surrounding landscape elements, including the backdrop. As a consequence, the level of visibility of the Project poles and conductor seen in the views is dissimilar. In **Photograph 5,** a backlit view looking west, silhouetted Project structures are more prominent in the foreground due to stronger visual contrast against the light colored distant mountains and sky in the background, while more

distant poles are less noticeable against the darker colored backdrop. On the other hand, **Photograph 6**, a view looking east and away from the sun, shows less visual contrast between the poles and the backdrop due to similarity in color. Additionally the more distant poles tend to blend in with the varied texture of the trees seen in the background.

After crossing US 395 the Project alignment turns eastward, and runs parallel to and approximately 0.85 mile south of the Owens River for approximately the next 5 miles. **Photograph 7** is a view looking north from the edge of a residential subdivision situated adjacent to the Bishop-Paiute Reservation, approximately 0.5 miles from the alignment. Near the center of this view multiple Project poles can be seen across a flat expanse of desert marsh, against a backdrop comprised of a low escarpment of the Volcanic Tablelands plateau north of the Owens River, and the taller more distant White Mountains. In this view utility features that are not related to the Project include overhead conductors in the foreground, and an array of wood poles on the left supporting a distribution line connecting to the subdivision. Project components seen in this view tend to blend in with the landscape and thus are not particularly noticeable, in part due to distance and backdrop characteristics as well as their being viewed in the context other, closer utility structures.

Photograph 8, is a motorist's view looking north along SR-6 from within the Owens River floodplain approximately 1 mile north of Bishop. Approximately 1,000 feet from the Project alignment, this view shows various utility structures on the horizon, including an H-frame structure and transformers, as well as wood poles that are part of the Control-Silver Peak/Zack Tap. Project elements are visible primarily against a backdrop that includes the White Mountains in the center-right of the photograph, and to the left, the low Volcanic Tablelands plateau. At this location, the side by side circuits that make up the Control-Silver Peak alignment are approximately 160 feet apart.

Approximately 4 miles northeast of Bishop at the junction of Silver Canyon Road near the eastern edge of the Owens Valley, SR-6 turns north to enter Chalfant Valley. The alignment continues east, and runs along both sides of Silver Canyon Road, passing through Laws, the site of a former railroad depot and current location of the open-air Laws Railroad Museum, a California Landmark that is listed on the National Registry of Historic Places. **Photograph 9**, a view looking west along Silver Canyon Road, shows a close-range view of part of the railroad museum. Along the right side of the road, wood poles supporting the northern circuit of the Project alignment are visible against the backdrop of sky and the Sierra Nevada mountains. The color and texture of the wood poles in the foreground corresponds to the weathered appearance of wooden buildings at the railroad museum visible on the left. The poles seen receding along the roadway blend into the landscape background as the distance increases. **Photograph 10,** taken 800 feet to the south and looking east, shows historic railroad equipment in the foreground with the southern segment of the Project alignment traversing the railroad museum site. Similar to the previous view, the Project poles are noticeable against the sky and the lighter hues of mountains in the background. However in this view, trees provide some screening and various elements including equipment along with adjacent buildings and trees within the museum yard provide multiple focal points in the foreground.

Photographs 11 and **12** are sequential views within Silver Canyon, showing the Project alignment along the left side of Silver Canyon Road, a mining-era wagon route, situated near the western boundary of Inyo National Forest. At this location the roadway consists of a gravel track that extends the length of the canyon with limited vehicle access. The Project alignment closely parallels the roadway, and the two views show the lower canyon entrance (Photograph 11) and where part of the alignment crosses the roadway as the canyon narrows, approximately one mile further east (Photograph 12). These two photographs demonstrate the degree of pole and conductor visibility is

variable, depending upon different lighting conditions and backdrop characteristics. Multiple wood Project poles can be seen receding into the distance, and depending on the viewing perspective relative to the backdrop, these elements blend in or contrast with the landscape background.

With increasing elevation, Silver Canyon narrows and steepens, and the desert scrub vegetation characteristic of the lower canyon environment is replaced by stands of pinon pine. Silver Canyon Road becomes more circuitous where it passes through the upper reaches of the canyon, and views become less open. In this area, views toward the project alignment, which continues in a relatively straight trajectory, are more limited and only portions of Project elements are visible due to intervening topography and vegetation. **Photograph 13**, a view looking west within upper Silver Canyon, illustrates a close-range perspective of the tops of three Project poles and overhead conductors visible above the stand of trees covering the steep slope of the canyon perimeter. The edge of the loosely graded roadbed can be seen in the immediate foreground, while beyond the stand of trees adjacent to the roadway in the upper right, one of the poles is silhouetted against the hazy backdrop of the Owens Valley and the Sierra Nevada range.

At higher elevations where trees are increasingly sparse the visibility of Project elements can appear more pronounced. Taken near the high point along Silver Canyon Road approximately 1,000 feet from the alignment, **Photograph 14** shows multiple wood poles silhouetted against the sky beyond the barren ridge landscape. In this view showing the alignment where it emerges from the canyon and approaches the broad, rounded summit above 10,000 feet elevation, Project poles below the ridgeline are barely visible against the darker colored basalt outcrop on the left. Project components are also barely evident when seen from a similar distance against the darker backdrop of trees, as shown in **Photograph 15**, taken near White Mountain overlook looking southwest toward Silver Canyon Road and approximately 0.75 mile northeast of the previous viewpoint location. Taken adjacent to, and approximately 325 feet northeast of the overlook, **Photograph 16** shows White Mountain Substation against the backdrop of a low rise with scattered conifers. Wood H-frame and pole structures at the substation blend in with the earth-toned backdrop, and the unpaved roadway in the foreground provides access to nearby Silver Peak where telecommunication facilities are located.

Approximately 0.2 mile from the substation, the Project alignment crosses White Mountain Road, part of the Ancient Bristlecone Scenic Byway that begins at the SR-168/US 395 junction in the Owens Valley south of Bishop and terminates at Patriarch Grove, approximately 9 miles north of the Project crossing. For approximately the first 10 miles from its junction with SR-168 White Mountain Road is paved, beyond which it continues as a well-maintained, unpaved public road accommodating street-legal vehicles and providing public access to the Project vicinity. **Photographs 17** and **18** are two motorist's views of the Project alignment from White Mountain Road. Taken approximately 2.4 miles north of the visitor center, Photograph 17 shows the ascending roadway in the foreground with open landscape of the summit to the west. In the foreground of this view overhead conductors span the roadway, and, where seen silhouetted against the sky, the wood Project poles contrast with the lighter background. Taken at the junction of Wyman Creek Road, approximately 600 feet west along this same roadway, **Photograph 18** shows an open, and slightly elevated view along the alignment where the two parallel sets of wood Project poles traverse the rolling topography of the summit. In this view shorter wood poles supporting a nearby distribution line and informational signs along the roadway can be seen in the foreground while the weathered wood Project poles blend in with the surrounding landscape and are not especially noticeable elements as they recede toward the mountainous backdrop.

From the summit of the White Mountains the Project continues eastward 11 miles along the narrow, meandering, Wyman Canyon that extends from near White Mountain Road to Deep Springs Valley.

Photographs 19 through **23** are views of the Project alignment from locations accessible to recreational visitors along Wyman Creek Road, an unpaved mining-era wagon route with restricted vehicular access. An historic cabin reflecting this past, and possibly built around 1905 when the power line was initially established, can be seen in forested terrain below White Mountain Road. As shown in Photograph 19, a portion of the nearby dead-end Project pole is also visible, and can be seen partially silhouetted against the sky. Photographs 20, 21, 22 and 23 illustrate an area of the Project where poles along the alignment are only discernible for a few hundred feet due to intervening topography and the meandering character of the canyon floor. The photographs also demonstrate that in cases where Project elements can potentially be seen, the degree of their visibility is influenced by the characteristics of the landscape backdrop, and the resulting level of contrast associated with the textures and colors of the background. For example, the poles that are partially silhouetted against the lighter-colored sky backdrop in Photograph 20, 22 and 23 are more distinctly noticeable elements compared with poles seen entirely against a backdrop of similar color and/or textured backdrop to that of the structures also seen in these same photographs as well as in Photograph 21.

Photographs 24 and **25** are two views from Wyman Creek Road near the intersection of Lower Wyman canyon and Deep Springs Valley. Photograph 24, looking west toward the canyon entrance from the eastern boundary of Inyo National Forest, shows a broad, vegetated arroyo formed by Wyman Creek on the left, adjacent to the unpaved road. In this close-range view looking uphill, Project poles in the immediate foreground are noticeable elements in the arid, largely monotone landscape, due to the darker wood structures contrasting against a light colored backdrop of the rocky canyon walls which are largely devoid of vegetation. More distant poles are less visible when seen against the darker rock outcropping. As noted in Section 3.2.1 and illustrated by maps in Figure 3, after crossing the Inyo National Forest, the project traverses areas of federal land administered by the BLM with a VRM Class 2 designation. Taken within BLM administered land, from a location approximately 0.3 mile east of the previous viewpoint, Photograph 25 depicts the open, panoramic landscape of Deep Springs Valley, as seen along Wyman Creek Road looking east. In this view, multiple poles within the Project alignment are noticeable due to contrast between the dark wood poles and the backdrop comprised of uniform texture lighter color distant valley floor and mountains. **Photograph 26,** a view further east along the same road as it approaches the valley floor, shows Project poles arrayed against the more varied color and coarsely textured background of desert scrub covered terrain. Seen at relatively close range, the structures are somewhat less noticeable compared with the poles seen in Photograph 25. From this location the single-circuit Deep Springs tap can be seen branching off of the Control-Silver Peak alignment, which is reflected by the single wood pole visible on the right side of the road.

From Wyman Creek Road the Project alignment turns to the northeast where it briefly adjoins SR-168 and travels approximately 0.9 mile before the parallel circuits bifurcate once again as the alignment crosses the 6,375-foot-high Gilbert Summit that separates Deep Springs Valley and Fish Lake Valley to the east. **Photograph 27** is a motorist's perspective taken along westbound SR-168 where the roadway enters Deep Springs Valley below Gilbert Summit. In this view, multiple wood Project poles supporting the parallel power lines recede into the distance and are seen against a backdrop of the White Mountains and the distant crest of the Sierra Nevada mountains. As it traverses Gilbert Summit, the Project alignment crosses SR-168 multiple times as the highway winds its way over the pass. **Photographs 28** and **29** are two views of the project where it crosses this winding roadway. Photograph 28 shows a somewhat typical eastbound motorist's view of the alignment as it crosses the roadway on its descent from the summit, where depending on the orientation of the roadway, Project poles are seen alternately against the mottled backdrop of the

comparatively narrow canyon walls and silhouetted against the sky on the opposite side of the road. In Photograph 29, where SR-168 veers to the north, the Project alignment is shown crossing the roadway as it continues northeast across Fish Lake Valley. In this motorist's view, poles adjacent to the roadway in the foreground are prominent, and seen primarily against a lighter background of sky, whereas the more distant poles seen on the right are less noticeable partially due to weaker contrast with the darker textured backdrop of Fish Lake Valley's desert agricultural landscape. Taken at the eastern margin of Fish Lake Valley**, Photograph 30** is a view from SR-266, one of the only all-season roads through the valley. Approximately 0.5 mile from its eastern terminus, the Project alignment crosses this roadway. In Photograph 30, multiple weathered Project wood poles of varying height are visible at the center left along with other poles associated with adjacent power lines converging at the Fish Lake Metering Station which can be seen in the background to the left of the main alignment. From this area the structures are barely discernible against the multi-hued background of the Silver Peak Range situated across the state line in Nevada.

Taken from northbound SR-168, **Photograph 31** is a northbound motorist's view of the Project where it crosses the roadway near the north end of Deep Springs Valley. In this view multiple wood Project poles of the single circuit Segment 5 alignment can be seen where the route traverses an area of largely uninhabited terrain, and a more distant portion of SR-168 roadway is partially discernible as it climbs toward Gilbert Summit. On the right side of the roadway, the upper part of the nearest Project pole is particularly noticeable, where it is silhouetted against the light colored sky whereas on the left side of the highway the poles seen against the mountain backdrop blend into the landscape more readily as they recede into the distance.

Photograph 32 is a view looking east toward the Chocolate Mountains taken near the Deep Springs College campus entry gate, approximately 0.4 miles from the Project alignment. In this view of Project Segment 5 near its terminus, Project poles are discernible beyond an irrigated field and canopies of isolated trees lining a campus perimeter road. When seen from this location the Project structures are barely noticeable against the dark backdrop of the mountains and within the context of foreground features including wood and painted metal entry gates, wood fencing, signage, and mature trees.

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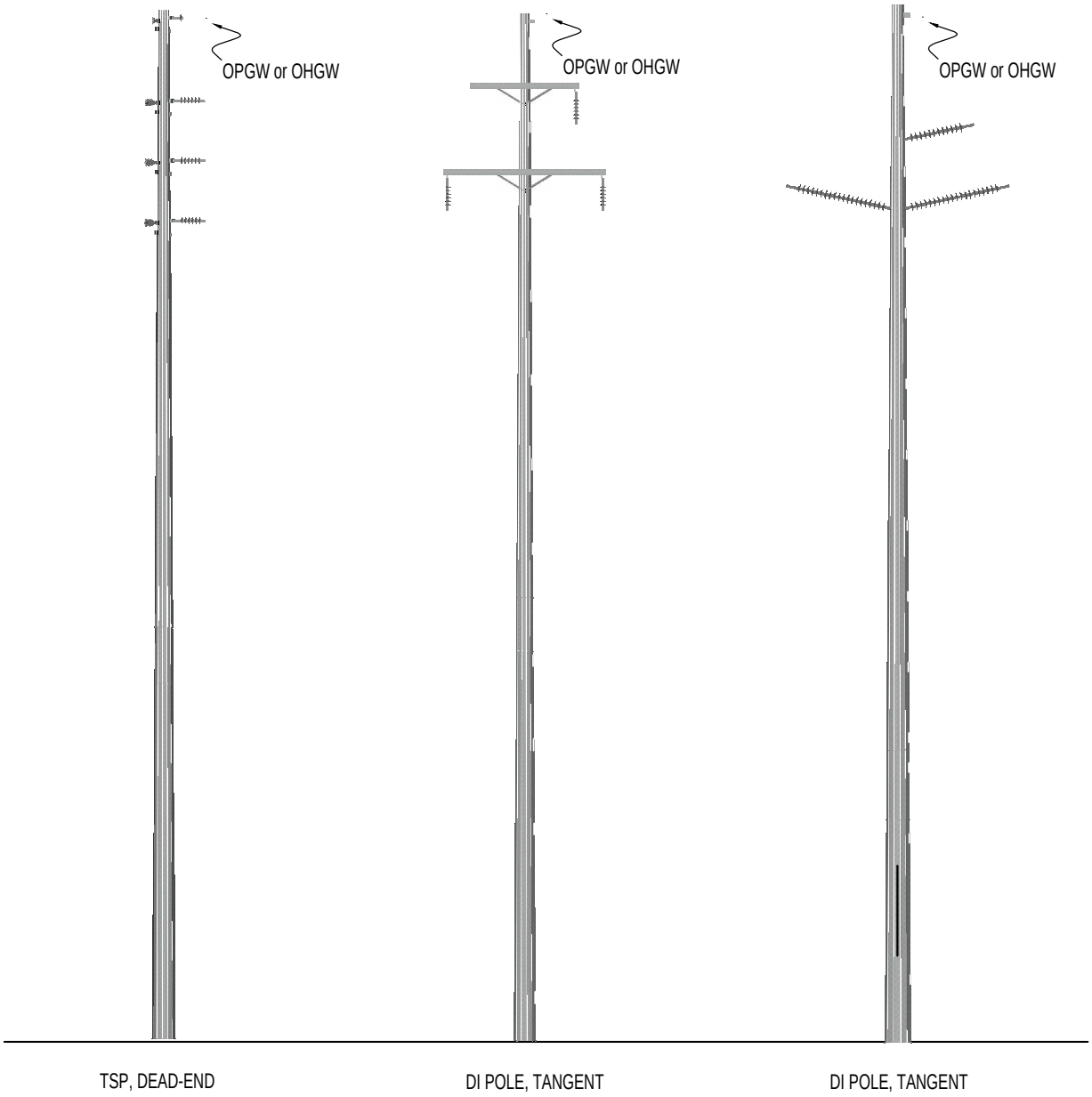

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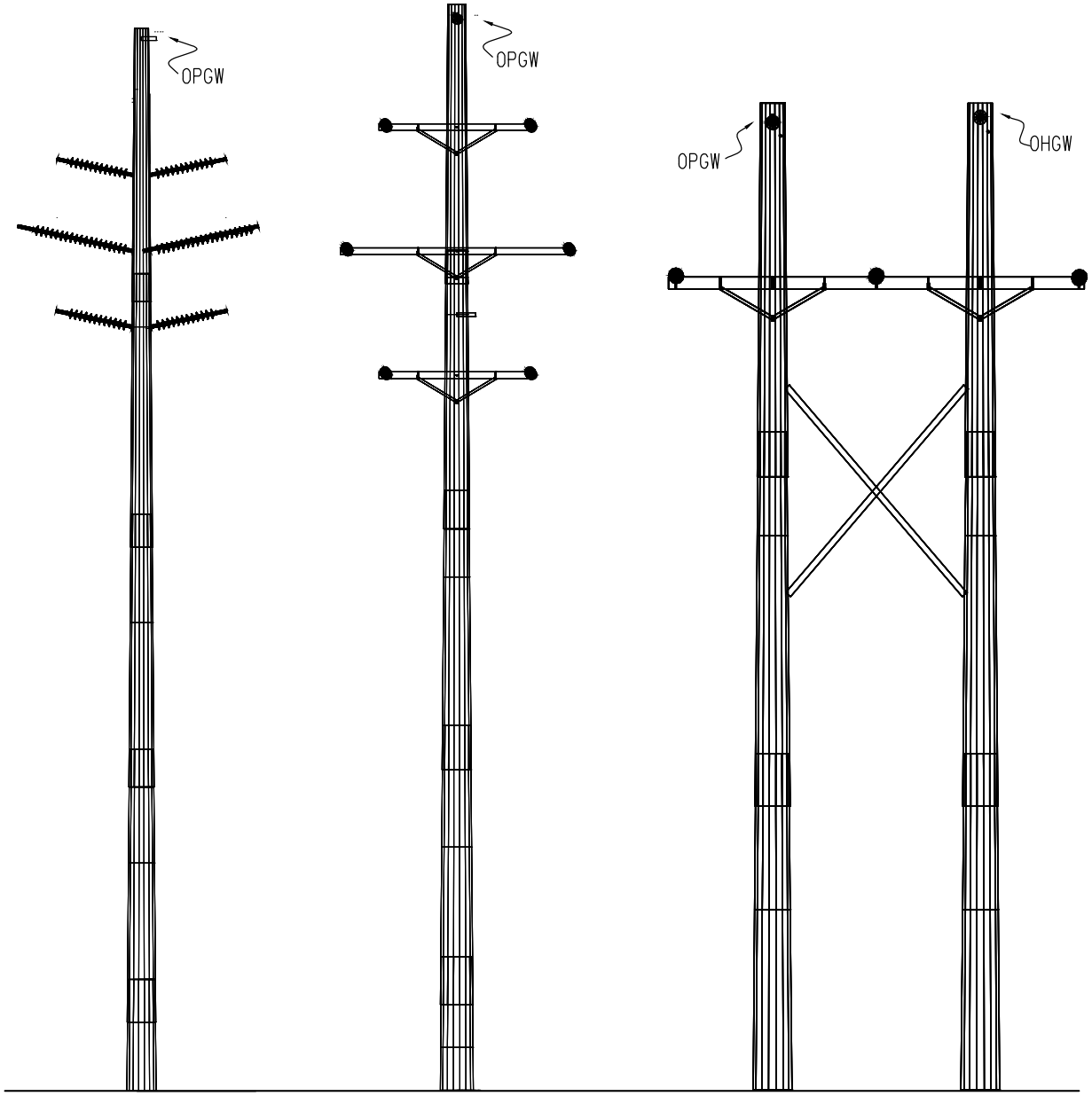

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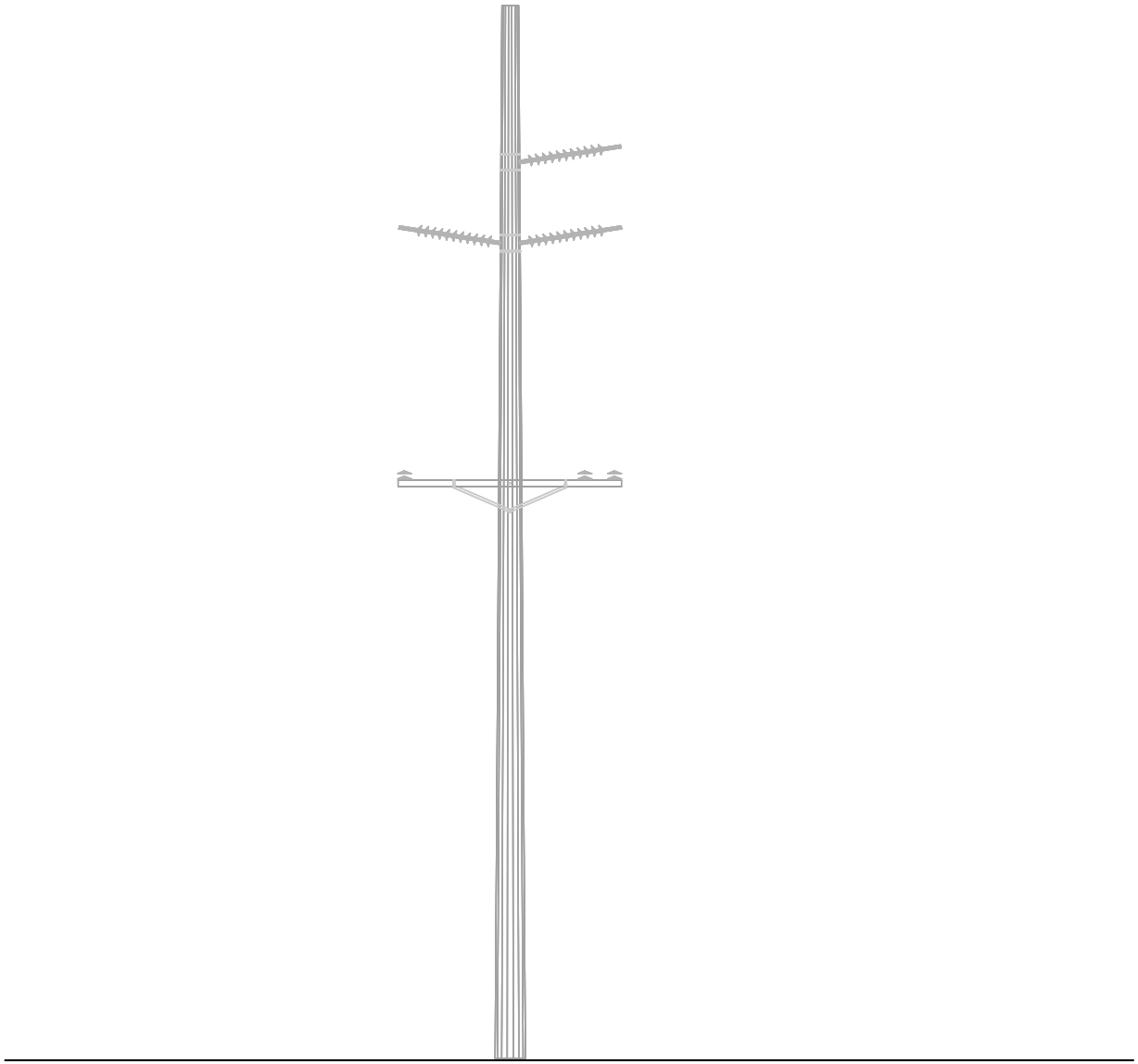

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