

## Comment Set B.13: Mary Johnson, ADAPT (Agua Dulce Against Power Towers)

**From:** Mary Johnson [mailto:maryjohnson@cwaveisp.net]  
**Sent:** Monday, October 02, 2006 1:17 PM  
**To:** Aspen Environmental  
**Subject:** Draft EIR/EIS comments

Dear Mr. Boccio and Ms. Kadota:

Attached are written comments submitted on behalf of ADAPT, Agua Dulce Against Power Towers. We are a grass roots, community based organization formed to gather information and take action as advocates of the community of Agua Dulce. ADAPT has the endorsement and active support of the Agua Dulce Town Council, the Agua Dulce Civic Association, the Agua Dulce and Acton media outlets, and of course the citizens of this community. Our formal legal response will be filed shortly. The attached letter will appear as an exhibit in the legal response.

We appreciate the opportunity to participate in the Draft EIR/EIS review process.

Sincerely,

*Mary Johnson*

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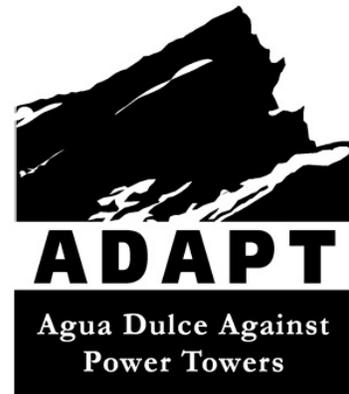
October 1, 2006

John Boccio, CPUC, EIR Project Manager  
Marian Kadota, USFS, EIS Project Manager  
Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

RE: Antelope Pardee 500kV Transmission Project Proposed by  
Southern California Edison  
Application No. A.04-12-007

Dear Mr. Boccio and Ms. Kadota:

The community of Agua Dulce is strongly opposed to the California Public Utilities Commission and United States Forest Service proposed Alternative 5 route to the Southern California Edison proposed Antelope Pardee Transmission Project, Segment 1. The community is so concerned about the Alternative 5 proposal that the citizens have joined together to form an information gathering and action committee, called ADAPT (Agua Dulce Against Power Towers). ADAPT has the endorsement of and active support of the Agua Dulce Town Council, the Agua Dulce Civic Association, the Agua Dulce and Acton media outlets, and of course, the citizens of this community.



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While we do not consider ourselves to be experts in the complexities of the project draft EIR, we have reviewed the impacts that the authors themselves have presented, and we conclude that the arguments in support of Alternative 5 are not properly substantiated and in fact are based upon erroneous comparisons with the original proposal and the other alternatives. It is our view that the most appropriate solution is the original proposal, which consists of the construction of a new 25.6 mile 500-kV transmission line between SCE's existing Antelope Substation and the Pardee Substation in Santa Clarita traversing much of an existing utility corridor.

B.13-2

In our review of the Draft EIR/S, ADAPT concludes that the preparers of the document have created a flawed route in Alternate 5. Alternate 5 was developed to respond to Forest Service policy and Forest Plan directive to develop an alternative located off NFS land. In Appendix 1-63, the document states "This Alternate would fully maintain the Project's objectives, purpose, and need while avoiding all impacts to the Angeles National Forest. However, the reason Alternate 5 was created (route located off NFS land) is not achieved since the route contains 1.5 miles of NFS land.

B.13-3

Agua Dulce is a popular film location for the entertainment industry. The relatively close proximity to the major studios (Agua Dulce is located within the 30 mile studio zone), the unique landscapes, low-density residences, and small and large ranches make Agua Dulce a unique and sought after location. Agua Dulce Movie Ranch manages over 50 properties in Agua Dulce for specific use by the film industry. William Fix, manager of Agua Dulce Movie Ranch locations, indicates his properties generate over 200 days of filming per year. Additionally, Vasquez Rocks Natural Area Park is itself a preferred location. According to statistics given by Acting Park Superintendent, Sandy Dininger at the Agua Dulce Town Council meeting of April 13, 2005, Vasquez Rocks had 160 days of filming in 2003 and 80 days of filming in 2004.

B.13-4

Vasquez Rocks is used regularly for television shows such as CSI and Las Vegas. Star Trek, The Flintstones, Planet of the Apes and many other feature films have used Vasquez Rocks as a location. Sierra Highway, in an area where Alternate 5 crosses Sierra Highway, is another much used location for the filming of cars. The Peppertree Market on Sierra Highway is used regularly for a convenience store in a rural setting. The Agua Dulce Airport is utilized for remote runway shots, and many of the horse ranches of Agua Dulce are used by the film industry. The construction, maintenance, and general operation of the high voltage transmission lines will cause a direct impact to future filming revenue in Agua Dulce. The unsightly towers will ruin the unspoiled backdrop we now have. Film production is a vital source of revenue for locations and a benefit to our local businesses as they provide support services to production. Many of our local residents are associated with the film industry. The economic impact of loss of filming in the area was not included in the Draft EIR/S.

Agua Dulce is an area classified as "very high fire danger zone." The dry, low humidity climate is host to the potential of brush fires. According to Los Angeles County Fire Department statistics, over the past 10 years, Fire Station 81, Agua Dulce, has responded on average to 400 calls per year. Generally, most fire calls are 80% EMS and 20% fire calls. Agua Dulce is not an urban, dense population. The local Fire Station captains estimate that the ratio between EMS calls and fire calls is closer to a 50-50 split. Based on those statistics, Agua Dulce has approximately 200 fire calls per year. The introduction of high voltage transmission lines in an established community in a very high fire danger zone will substantially increase the risk of fire.

B.13-5

The construction of high voltage transmission lines in our community will undoubtedly result in higher risk of bodily injury and property damage creating long-term liability risk of fire. According California Department of Forestry and Fire Prevention, 3 out of the top 20 of

California's largest wildfires were caused by power lines. The Laguna fire in San Diego County in 1970 burned 175,425 acres destroyed 382 structures and resulted in 5 deaths. The Campbell Complex fire in Tehama County in 1990 burned 125,892 acres and destroyed 27 structures. The Clampitt fire in Los Angeles County in 1970 burned 105,212 acres, destroyed 86 structures, and resulted in 4 deaths.

LA County Fire Department Assistant Fire Chief Scott L. Poster, Fire Marshal, stated the dangers associated with high voltage transmission lines. "Nothing should be under or near a high voltage transmission line. We don't fight fires under a transmission line because of the danger it poses." Ground fire defense is limited by the distance the firefighter can approach high voltage transmission lines. Smoke generated by fire causes arcing on power lines. Fire fighters must keep a safe distance away from the power lines. The transmission lines involved in the Crown Fire in Acton in 2005 hampered the ground and air defense for fire fighting. Chief Poster forwarded a copy of LA County Fire Department's Fire Prevention Manual, Regulation 27. The purpose of the regulation is to establish consistent requirements for new or existing structures and other secondary land uses within or adjacent to high voltage transmission line easements. The regulation prohibits any dwellings within 50 feet of the drip line of any transmission line, and also requires the establishment of a 100 foot easement parallel to the direction of the transmission lines. Such safety requirements by the Fire Department make Alternate 5 an infeasible option.

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Alternative 5 would be located approximately 0.8 miles east of Vasquez Rocks Natural Area Park. Los Angeles County Regional Recreation Areas Plan amended July 29, 2005 designates Vasquez Rocks as a reservation due to the unique geological formations and its notoriety as a former outlaw hideout. Reservations are lands preserved for development in order to protect scenic vistas, unusual native plants and animals, geologic phenomena, or open space that would enhance or complement the recreational function of an adjacent or nearby recreational area. The introduction of a new industrial land use in close proximity to this Natural Area will alter the natural, scenic quality. The unsightly towers will be visible from many vantage points within Vasquez Rocks and will have significant unavoidable impacts.

B.13-6

The Pacific Crest Trail (PCT) is the jewel in the crown of America's scenic trails, spanning 2,650 miles from Mexico to Canada through three western states. Agua Dulce is fortunate to have a few miles of this National Trail within our boundaries. The Draft EIR/S indicates the PCT would be crossed by Alternate 5 as it traverses a portion of public land managed by the BLM south of State Highway 14. The report fails to indicate that the transmission lines will be in close proximity to the PCT for a few miles.

B.13-7

In addition to the Pacific Crest Trail, Alternate 5 will cross over another important trail, the Los Angeles County Backbone Trail. This trail parallels Sierra Highway at the point that Alternate 5 crosses Sierra Highway at Anthony Road. Anthony Road is another unimproved road that serves as a popular trail. Alternate 5 will also cross over the California Hiking and Equestrian Trail that parallels Hierba Road. All of these recreational resources are used by equestrians and hikers. The huge towers and the noise associated with transmission lines as well as the noise associated with construction will increase the risk for bodily harm associated with equestrian activities.

In the Notice of Preparation dated June 24, 2005, C. Project Alternates, 500 kV Route Alternates states the following: "Non-Forest Service Land Alternative that would avoid National Forest System lands. This alternative will be developed during the environmental review process." By delaying the release of the proposed route utilizing non-NFS land, the public was

B.13-8

denied the right to take part in the Scoping Process of this project regarding the “Non-Forest Service Land Alternative.”

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When the Notice of Availability, Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Antelope-Pardee 500-kV Transmission Project was released on July 21, 2006, the description of Alternate 5: Antelope-Pardee Sierra-Pelona Re-Route states the following: “This alternative would establish a new overhead transmission line between the Antelope and Pardee substations along a route that was originally proposed to circumvent the ANF. This new transmission ROW would be located along the eastern edge of the ANF boundary and traverse the ANF for approximately one-half mile along this route.” Nowhere in the description does it indicate the location of the new route. The communities of Agua Dulce and Leona Valley were not included in the description. Lack of full disclosure of Alternate 5 causes the Notice of Availability to be inaccurate.

B.13-9

Very few affected residents received the official Notice of Availability. It is questioned if the affected property owners along Alternate 5 route were ever included in the mailing. The preparers of the Draft EIR/S indicate the Notice of Public Scoping Meetings mailed on June 24, 2005 was mailed to 3,423 addresses, including community organizations, interest groups, and property owners in the vicinity of the *Proposed* Project route. Lack of adequate notice to property owners in the vicinity of Alternate 5 causes the Draft EIR/S process to be compromised.

B.13-10

ADAPT has been in contact with various elected officials. California State Senator George Runner, California Assemblywoman Audra Strickland, California Assemblyman Keith Richman, California Assemblywoman Sharon Runner, and Los Angeles County Mayor Michael D. Antonovich have all publicly declared their opposition to Alternate 5.

In conclusion, Alternate 5 does not meet the project objectives of a route completely on non-NFS land. The establishment of a new ROW, much of which would bisect the communities of Agua Dulce and Leona Valley, impacts land, people and businesses that would otherwise be unaffected by the Proposed Project. We ask that Alternate 5 be eliminated from further consideration.

B.13-11

We appreciate the opportunity to participate in the review process. If any of our comments need clarification or further explanation, please contact us.

Sincerely yours,

*Mary Johnson*

Mary Johnson, Chair  
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## Response to Comment Set B.13: Mary Johnson, ADAPT (Agua Dulce Against Power Towers)

- B.13-1 Thank you for submitting your opinion on Alternative 5.
- B.13-2 Thank you for submitting your opinion and comments on the Project. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- B.13-3 As described in Response to Comment GR-4, the USDA Forest Service Manual (FSM) states that a special use proposal to use and occupy federal lands, including National Forest System (NFS) lands may be denied if it “can reasonably be accommodated on non-NFS lands...” At the same time, however, per the direction given in the USDA Forest Service letter dated January 24, 2003, “the use and occupancy of federal lands, including National Forest System (NFS) lands, is an important element in facilitating the exploration, development, and transmission of affordable and reliable energy to meet [these] NEP [(National Energy Policy)] goals”, which include increasing domestic energy supplies, modernizing and improving the nation’s energy infrastructure, and improving the reliability of the delivery of energy from its sources to points of use, and “should be an important consideration when responding to proposals for the siting of energy and energy related facilities on NFS lands”. As such, the original intent of the alignment to meet USDA Forest Service requirements is met, as the majority of the alignment is off NFS lands, while also considering NEP goals. Alternative 5 would cross 1.5 miles of NFS lands, which is considerably less than the proposed Project (12.6 miles), Alternative 1 (12.6 miles), Alternative 2 (13.2 miles), Alternative 3 (12.6 miles), and Alternative 4 (12.5 miles). The discussion of alternatives need not be exhaustive. What is required is information sufficient to permit a reasoned choice of alternatives so far as environmental aspects are concerned, including alternatives not within the scope of authority of the responsible agency. Nor is it appropriate to disregard alternatives merely because they do not offer a complete solution to the problem (*Natural Resources Defense Council v. Morton*, 458 F.2d 827 (D.C. Cir. 1972)).
- B.13-4 As discussed in Draft EIR/EIS Section C.15.10.2, impacts to views from Vasquez Rocks as a result of Alternative 5 would be significant and unavoidable (Class I). While these impacts were found to be significant and unavoidable, economic impacts related to the filming at Vasquez Rocks Natural Area Park are unlike the Veluzat Motion Picture Ranch, which is a land use specifically designated for filming activities only. The Vasquez Rocks Natural Area Park is not a specific filming location, and has a primary purpose of being a public recreational use area. Furthermore, due to the proposed linear route of Alternative 5, and the size and topography of the Vasquez Rocks Natural Area Park, it is believed that locations would continue to be available within the Park that would provide similar background views for filming without views of the transmission line and towers impeding filming activities.

It is not possible to quantify any economic loss associated with filming that might result from implementation from Alternative 5. In fact, it is difficult to determine with any certainty whether the amount of filming conducted in the area would decline in the future and whether such a possible decline would be the result of Alternative 5. Only a portion of the area would be affected by Alternative 5 and it is doubtful that all the locations mentioned in the comment would no longer

receive use as filming locations because of Alternative 5. For instance, filming at Vasquez Rocks is typically directed toward the interior of the Park where the Park's unique rock formations form the dominant view. To film from the Park toward Alternative 5 more than a mile east of the Park would also entail filming various existing homes and various other man-made features in the landscape that are located just outside the Park boundaries. As a result, most of the locations typically filmed within the Park would be unaffected by Alternative 5.

The Draft EIR/EIS Section C.15.10.2 concludes that the visual impacts of Alternative 5 are significant and can only be avoided in the Agua Dulce area through the implementation of another alternative. For instance, Impacts V-24, V-25, and V-26 indicate that the visual impacts from Alternative 5 at Key Observation Points in the Agua Dulce area would be significant and unavoidable. While the socioeconomic impacts to the filming industry cannot be reliably estimated, your concerns regarding this issue will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.

- B.13-5 Thank you for your comments and concerns regarding Alternative 5. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC. A discussion of the limitations on fire fighting in the vicinity of transmission lines is presented in Section C.7.5 of the Draft EIR/EIS. Please note that all rules and regulations regarding the construction, operation, and maintenance of transmission lines will be adhered to by SCE.

The Lead Agencies acknowledge the potential fire hazard associated with power lines. High, gusty winds may cause vegetation to sway into power lines, break off limbs, or fall into the lines. High winds may also create vibrations in power lines that can lead to stress failures or can cause loose connections to separate. Arcing usually accompanies such faults (RW Beck, 2006).

Large birds and raptors may also present a hazard as they frequently use power line poles or towers as a roosting place. Two problems which may arise from this situation are that their droppings build up on insulators to the extent that the potential exists for a flash-over between the conductors and the structure. This situation can cause a line fault and the potential for glowing debris to fall to the ground. Secondly, during take-off or landing, their wings can touch two conductors and create a short circuit. This situation can cause the bird to fall to the ground and ignite dry vegetation. Similar problems have been found involving small birds and climbing animals resting on distribution transformers and coming in contact with the bushings resulting in a short circuit (RW Beck, 2006).

The significant majority of power line related fires occur on lower voltage distribution lines rather than high voltage transmission lines such as the project (RW Beck, 2006). Distribution lines are typically installed on shorter structures and have smaller wire-to-wire spacing. Because of the shorter structures, these lines are located in much greater proximity to trees and vegetation. Fire hazards from high voltage transmission lines, such as the proposed Antelope-Pardee Project, are greatly reduced compared to lower voltage lines through the use of taller structures and wider ROWs (RW Beck, 2006). Transmission line ROWs are also cleared of trees to control this hazard. Further, transmission lines are designed in accordance with the *Suggested Practices for Raptor Protection on Power Lines* with wire-to-wire spacing that exceeds the wingspans of large birds.

Electric utilities are concerned with minimizing electrical fire hazards and minimizing interruptions of their service to their customers. SCE has worked with the California Department of Forestry and other electric utilities in California to develop the *Power Line Fire Prevention Field Guide* (SCE,

PG&E, and SDGE, 2001. Available online at Office of the State Fire Marshal, Fire Safe Planning, <http://osfm.fire.ca.gov/powerline.html>) to set minimum standards in the design and operation of distribution and transmission lines.

B.13-6 Your comments are consistent with the findings of the Draft EIR/EIS. Please refer to Section C.15.10.2 regarding visual impacts to Vasquez Rocks County Park (KOP 5-7).

B.13-7 Table C.9-5 of the Land Use and Public Recreation section identifies the PCT as being crossed by Alternative 5 and impacts to the PCT are discussed under Public Recreation in Section C.9.10.2. The long-term loss or degradation of trails, including the PCT and Los Angeles County trails, due to Alternative 5 is identified as a significant and unavoidable impact that has no mitigation. This impact is described under Public Recreation in Section C.9.10.2 under Criterion REC2.

Please see the response to Comment B.15-5 for information regarding impacts on equestrian activities.

B.13-8 At the time the Notice of Preparation was prepared, the exact route or even a rendition thereof for the “Non-Forest Service Land Alternative”, which would eventually become Alternative 5 and be incorporated into the Draft EIR/EIS, was yet to be determined. At that time, alternatives being considered to avoid National Forest System Lands included other transmission alternatives that would not require upgrades or a new corridor between Antelope Substation and Pardee Substation. As such, impacts to Agua Dulce were not apparent and no noticing or scoping in this specific area was found to be necessary. Please also refer to General Response GR-4 regarding alternatives identification, screening, and analysis.

B.13-9 While the written description of Alternative 5 in the Notice of Availability (NOA) may not include direct references to Leona Valley and Agua Dulce, the map on page 2 of the NOA specifically shows the Alternative 5 alignment passing through both.

B.13-10 Please see General Response GR-5 regarding noticing procedures.

B.13-11 Thank you for your comments and concerns regarding Alternative 5. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC. Please note that all rules and regulations regarding the construction, operation, and maintenance of transmission lines will be adhered to by SCE regarding of the selected alternative.