

Comment Set B.17: Pacific Crest Trail Association



Dear Marian Kadota and John Boccio,

The Pacific Crest Trail Association has reviewed the Draft Environmental Impact Report/Statement for Southern California Edison's Antelope Pardee 500-kV Transmission Project. The proposed project and several of the alternative routes will significantly affect the Pacific Crest Trail National Scenic Trail (PCT), as well as the experience that it provides to its users. A National Scenic Trail is supposed to create an opportunity where the hiker or equestrian can seek solitude and immerse themselves in the natural beauty of the environment. In 1968, Congress passed the National Trails System Act, in which they stated that National Scenic Trails should be, "so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass."

The Proposed Route, which calls for the replacement of an existing 66-kV transmission line, will cross the PCT approximately .25 miles north of Forest Road 6N09. Currently, the 66-kV transmission line can be seen by hikers on the horizon while traveling on the PCT, in addition to several 500-kV towers. Tower 192 presently stands 20 feet from the trail, and has a base of approximately 15 feet by 15 feet. If this tower were to be replaced by a tower that spans 96 feet, requiring a 160 foot corridor, the PCT would either have to be realigned or the tower would straddle the trail. This poses a great threat to the safety of hikers and equestrians, and intrudes upon the experience. The DEIR/DEIS requests that the new larger towers be set back at least 300 feet from the trail. The PCTA wholeheartedly supports that recommendation, however, we would strongly encourage the set back limit be increased to 500 feet.

B.17-1

Alternative 2A would cross the PCT approximately one mile southeast of the proposed route and would have the similar impacts on both the trail and users' experience. However, if this transmission line is built according to Alternative 2A, the PCTA and its supporters request that the existing 66-kV transmission line be relocated and consolidated with the 500-kV line. Upon tearing down the existing transmission line the PCTA would like to assure that it be removed in an environmentally sound manner.

B.17-2

Finally, Alternative 5, which avoids National Forest land and instead goes through Agua Dulce, would interfere with future plans for the PCT. The PCTA is in the process of acquiring land in the Agua Dulce area, namely near the Agua Dulce Air Park, to relocate the trail. Through our Optimal Location Review process, the PCTA determined that the "road walk" in Agua Dulce does not fit the criteria of a National Scenic Trail. It also compromises the safety of hikers and stock on the trail. Upon completing the field work, our land acquisition team began purchasing parcels of land in which to relocate the trail. This land would then be turned over to the Angeles National Forest.

B.17-3

The construction of this transmission line would cause an enormous impact on the trail and on the experience of the user. While using a helicopter will help to reduce erosion and negative impacts to the ground, it will infringe upon the experience both visually and audibly. We ask that the towers be erected during the late fall or winter season so as to not affect the prime hiking / riding season. The PCTA also demands that no access road be built within a quarter mile of either side of the PCT. This area is highly used by Off Highway Vehicles, which are illegal to ride on the PCT. Having access roads near the PCT invites illegal use, and creates significant damage, which is both costly and challenging to repair.

B.17-4

B.17-5

B.17-6

In sum, the PCTA has the following recommendations:

1. *No Project Alternative:* Due to the significance of this nationally recognized trail, the PCTA suggests that SCE not further impact the trail.
2. *New Project Alternative:* The PCTA would like to recommend another option for a 500-kV transmission line. We suggest that the Antelop Pardee transmission line start on the same path as Alternative 5 leaving from the Antelope substation. Approximately 2 miles north of the Sierra Highway the transmission line would intersect with an existing utility corridor that could be utilized to span the remaining distance to the Pardee substation. This alternative would avoid the chance of a 500-kV transmission line paralleling the future route of the PCT in Alternative 5. More importantly, it would allow the PCT to cross the transmission line at a road crossing where urban impacts already exist. This route would also substantially minimize the portion of the route traversing National Forest lands to about 3 miles; which would almost completely eradicate the need to extend an existing ROW through the Angeles National Forest.

B.17-7

The PCTA strongly encourages the CPUC and SCE to further explore this alternative, as it would considerably reduce both the environmental impacts as well as the residential impacts.

Of the alternatives that SCE has offered, the PCTA supports the Proposed Route so long as the aforementioned mitigation efforts are guaranteed. Because there is already visual impact due to other 500-kV transmission lines in the vicinity, we feel that the best option is to consolidate that impact and cross the trail at one location and move away from the direction of the PCT.

B.17-8

Thank you for extending the opportunity to review and comment on this project. Please contact me with any further comments.

Sincerely,

Suzanne Wilson
Regional Representative
Pacific Crest Trail Association



Response to Comment Set B.17: Pacific Crest Trail Association

- B.17-1 Draft EIR/EIS Section C.15.4 states that the applicant would place the transmission towers a minimum distance of 300 feet from the Pacific Crest Trail where the proposed transmission line crosses the PCT north of Spunky Canyon Road (APM VIS-2). Your recommendation will be passed on to USDA Forest Service decision-makers, who will decide whether an increased setback from the PCT is warranted and/or technically feasible.
- B.17-2 As discussed in Section B.4.2.3 of the Draft EIR/EIS, Alternative 2 would include the removal of 17.5 miles of the existing 66-kV line, including 119 existing 66-kV towers between proposed Project Mile 1.1 and Mile 18.6 in the existing Saugus-Del Sur utility corridor. Removal activities would be subject to the same Applicant-Proposed Measures (APMs) and mitigation measures as identified in the EIR/EIS, thereby ensuring these activities would occur in an environmentally sound manner.
- B.17-3 Thank you for your comments. They will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- B.17-4 Thank you for your comments. They will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- B.17-5 Thank you for your comment. It will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- B.17-6 Thank you for your comment. It will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- B.17-7 Thank you for submitting your recommendations and a potential alternative to the Project. As discussed in General Response GR-4, a reasonable range of alternatives has already been identified for the Project in accordance with CEQA and NEPA requirements. We appreciate your concern for impacts on the Pacific Crest Trail (PCT). The suggested alternative routing would avoid significant visual impacts to the PCT associated with Alternative 5. However, these same impacts are already avoided by the proposed Project and other alternatives (Alternatives 1 through 4). The proposed Project and other alternatives (except Alternative 2) would cross the PCT in the Angeles National Forest (ANF) at the same location as the existing Antelope-Pole Switch 74 subtransmission line. Alternative 2 would cross the PCT in the ANF a little further east of the existing Antelope-Pole Switch line. The proposed Project and Alternatives 1 through 4 would all avoid paralleling the PCT. Furthermore, an existing Utility Corridor designated in the Forest Plan already traverses the ANF in the vicinity of the proposed Project and Alternatives 1 through 4. The project does not involve the extension of ROW through the ANF, but rather the continued utilization of this designated Utility Corridor. The specific alignment of this corridor would be adjusted to correspond to the specific alignment of whatever transmission line route is approved across the ANF, if any.

Neither NEPA nor CEQA requires a separate analysis of alternatives which are not significantly distinguishable from alternatives actually considered or which have substantially similar consequences. The decision-makers are already presented with a reasonable range of alternatives and choices for selection of an alternative that would avoid the impacts addressed by the commenter's suggested alternative. Therefore, the Lead Agencies have decided not to include

detailed analysis of your suggested alternative in the Final EIR/EIS. However, your concerns regarding Alternative 5's adverse impacts on the PCT will be shared with decision-makers who are evaluating the Project and alternatives at the Forest Service and CPUC.

- B.17-8 Thank you for your comments. They will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.