

Comment Set C.171: Diane A. and Michael W. Terito

**Diane A. Reed (Terito)  
Michael W. Terito  
33450 Trail Ranch Road  
Agua Dulce, CA 91350  
PH: 661-268-8701, FAX: 661-268-7324  
E-mail: reedterito@aol.com**

**October 3, 2006**

**John Boccio, CPUC, EIR Project Manager  
Marian Kadota, USFS, EIS Project Manger  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301  
Via E-mail: [Antelope-pardee@aspeneq.com](mailto:Antelope-pardee@aspeneq.com)**

**VIA Fax and E-mail**

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

*Dear Sir and Madam:*

As 10-year residents of Agua Dulce, an unincorporated community in north Los Angeles County, CA, we are opposed to the California Public Utilities Commission (CPUC) and United States Forest Service (USFS) proposed Alternative 5 route for the Southern California Edison (SCE) Antelope Pardee Transmission Project, Segment 1.

C.171-1

While we certainly are not experts in the complexities of a project Draft Environmental Impact Report (DEIR) or the federal equivalent, there are some observations we have been able to make during the short time frame of the Public Comment Period.

**LACK OF DEFINITIVE DETAIL:** *It appears to us that there is a lack of necessary detail in the entire DEIR/DEIS for anyone to assess the many impacts on our local and neighboring communities, as well as the rest of the Santa Clarita Valley and Palmdale. Alternative 5's route has not been determined with any exactitude, nor has it been studied thoroughly under CEQA and NEPA. We are trying to analyze and respond to a project alternative that is ephemeral. The route may vary by hundreds of feet in any one direction, leaving frightened home and business owners in limbo until after a decision is made. Clearly, if the original project is not adopted, a new and more detailed DEIR/DEIS will need to be done on the alternative selected.*

C.171-2

**UNSTUDIED ALTERNATIVES:** *Following are two more alternatives that have not been studied. One is suggested in the DEIR/DEIS, and is, according to an independent expert in the power field, entirely possible and efficacious. The other is a New Project Alternative submitted by the City of Santa Clarita. Both alternatives are described below and are the project alternatives that we would support.*

C.171-3

Diane & Mike Terito  
Page 1 of 4

1. **DEIR/DEIS – Page B-112, B.4.6.2:** “It should be noted that connection to the transmission systems of other power utilities (such as PG&E or LADWP) is possible but would not meet SCE’s objectives for the Project and would not fulfill the goals of the Tehachapi Collaborative Study Group (see Section A.3.1 and A.3.2)” In this proposed solution, SCE would simply string its wires/cables on the power towers of other utility companies. It appears to us that this unstudied alternative, found under the No Project/Action Alternative, would resolve the “expected events or actions (scenarios) related to electricity generation and transmission” as quoted in bullet points below the cited quotation. As an example: Bullet point 1 – “Initial wind projects in the Antelope Valley and Tehachapi areas would be postponed or cancelled, as additional transmission capacity would not be available, or these proposed wind projects would have to find alternate means to connect to SCE’s transmission system without compromising system reliability”, **UNLESS Southern California Edison (SCE) connects to the transmission systems of other power utilities (such as PG&E or LADWP).** This same tag-line could be applied to the rest of the bullet points, and to the general goals attributed to SCE. The faxed version of this letter will include the DEIR/DEIS page (B-112) for your ease in understanding this proposal or you may find it using the citation give above from the DEIR/DEIS.

We strongly urge that this unstudied alternative be evaluated and considered in a new DEIR/DEIS, as it would reduce the identified and unidentified impacts to all concerned, including the USFS.

2. **CITY OF SANTA CLARITA:** My husband and I endorse the City’s proposed New Project Alternative as described in its letter to the Honorable Julie Halligan, Administrative Law Judge, and others dated September 29, 2006, Page 2.2. We agree that, if new power towers are to be built, they should be as far away from both densely and sparsely populated areas as possible. We would favor this proposed new project alternative, provided that it does not just move the towers from our backyard to someone else’s neighborhood.

**ALTERNATIVE 5:** Since Alternative 5 has not been studied, it is impossible to know the final impacts that would occur along a route that runs on homeowners’ land, or in close proximity to homes, schools, parks and businesses. Lack of proper design and study leave us to ponder how great the devastation to our area will be. However, we support the research of others, such as Los Angeles County Department of Regional Planning (letter of September 28, 2006, to the Los Angeles County Board of Supervisors) in which Bruce W. McClendon, FAICP, Director of Planning, sums up his findings:

***“Alternative Five is extreme in that its proposed design to avoid the ANF takes the alignment of the transmission lines and towers through populated areas of Leona Valley, Ritter Ranch and Agua Dulce. The County should be cautious whenever transmission lines are proposed to pass through such rural communities. Also, Agua Dulce Airpark is located within approximately 1 mile***

Diane & Mike Terito  
Page 2 of 4

***from the transmission lines and towers and the project will require Federal Aviation Administration approval of this route. The Fire Department's Fire Prevention Manual, under Regulation No. 27, 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 Alternative Five an infeasible alternative and is not recommended for implementation."***

We also agree with the analysis done by Agua Dulce Against Power Towers (ADAPT) on the subject of Alternative 5. In addition, we appreciate the submissions made by our honorable political leaders against Alternative 5. We urge you to join with them in denying Alternative 5 as a viable solution for this project. Your consideration of the two unstudied alternatives proposed above would be greatly appreciated. We await your reply.

Sincerely yours,



*Diane and Mike Terito*

**Diane A. Reed Terito and Michael W. Terito**  
33450 Trail Ranch Road  
Agua Dulce, CA 91390

Cc:

Dan Dunmoyer, Deputy Chief of Staff [Dan.Dunmoyer@GOV.CA.GOV](mailto:Dan.Dunmoyer@GOV.CA.GOV)  
CPUC President Michael R. Peevey [commissionerpeevey@cpuc.ca.gov](mailto:commissionerpeevey@cpuc.ca.gov)  
CPUC Commissioner Dian Grueneich [commissionergrueneich@cpuc.ca.gov](mailto:commissionergrueneich@cpuc.ca.gov)  
CPUC Commissioner John Bohn [commissionerbohn@cpuc.ca.gov](mailto:commissionerbohn@cpuc.ca.gov)  
CPUC Commissioner Rachelle Chong [commissionerchong@cpuc.ca.gov](mailto:commissionerchong@cpuc.ca.gov)  
CPUC ALJ Julie Halligan [jmh@cpuc.ca.gov](mailto:jmh@cpuc.ca.gov)  
US Senator Barbara Boxer [senator@boxe.senate.gov](mailto:senator@boxe.senate.gov)  
US Senator Dianne Feinstein [senator@feinstein.senate.gov](mailto:senator@feinstein.senate.gov)  
US Congressman Buck McKeon [Linda.lambourne@mail.house.gov](mailto:Linda.lambourne@mail.house.gov)  
CA Senator George Runner [senator.runner@sen.ca.gov](mailto:senator.runner@sen.ca.gov)  
CA Assemblywoman Audra Strickland [assemblymember.strickland@assembly.ca.gov](mailto:assemblymember.strickland@assembly.ca.gov)  
CA Assemblyman Keith Richman [Assemblymember.Richman@asm.ca.gov](mailto:Assemblymember.Richman@asm.ca.gov)  
CA Assemblywoman Sharon Runner [assemblymember.runner@assembly.ca.gov](mailto:assemblymember.runner@assembly.ca.gov)  
LA County Mayor Michael Antonovich [mantonovich@lacobos.org](mailto:mantonovich@lacobos.org)  
LA County Supervisor Gloria Molina [molina@lacobos.org](mailto:molina@lacobos.org)  
LA County Supervisor Yvonne B Burke [seconddistrict@lacobos.org](mailto:seconddistrict@lacobos.org)  
LA County Supervisor Zev Yaroslavsky [zev@lacobos.org](mailto:zev@lacobos.org)  
LA County Supervisor Don Knabe [don@lacobos.org](mailto:don@lacobos.org)  
Mayor Laurene Weste, Santa Clarita City Council [lweste@santa-clarita.com](mailto:lweste@santa-clarita.com)  
John Boccio, EIR Project Manager, CPUC [jbx@cpuc.ca.gov](mailto:jbx@cpuc.ca.gov)  
Marian Kadota, Project Manager, USDA Forest Service [mkadota@fs.fed.us](mailto:mkadota@fs.fed.us)  
Aspen Environmental Group [Antelope-pardee@aspeneg.com](mailto:Antelope-pardee@aspeneg.com)  
Jody Noiran, Angeles National Forest Supervisor [jnoiron@fs.fed.us](mailto:jnoiron@fs.fed.us)  
Agua Dulce Town Council [aguadulce2006@aol.com](mailto:aguadulce2006@aol.com)  
Leona Valley Town Council, Terry Kenney [herdem@aol.com](mailto:herdem@aol.com)  
Acton Town Council President, Ray Garwacki [rgarwacki@prodiqy.net](mailto:rgarwacki@prodiqy.net)  
Lillian Smith Publisher, Country Journal [countryjournal@bigplanet.com](mailto:countryjournal@bigplanet.com)

Diane & Mike Terito  
Page 3 of 4

**cc:** [commissionerpeevey@cpuc.ca.gov](mailto:commissionerpeevey@cpuc.ca.gov); [commissionergrueneich@cpuc.ca.gov](mailto:commissionergrueneich@cpuc.ca.gov);  
[commissionerbohn@cpuc.ca.gov](mailto:commissionerbohn@cpuc.ca.gov); [commissionerchong@cpuc.ca.gov](mailto:commissionerchong@cpuc.ca.gov);  
[jmh@cpuc.ca.gov](mailto:jmh@cpuc.ca.gov); [Linda.lambourne@mail.house.gov](mailto:Linda.lambourne@mail.house.gov);  
[senator.runner@sen.ca.gov](mailto:senator.runner@sen.ca.gov); [Assemblymember.Richman@asm.ca.gov](mailto:Assemblymember.Richman@asm.ca.gov);  
[assemblywoman.runner@assembly.ca.gov](mailto:assemblywoman.runner@assembly.ca.gov); [mantonovich@lacbos.org](mailto:mantonovich@lacbos.org); [lweste@santa-clarita.com](mailto:lweste@santa-clarita.com);  
[jbx@cpuc.ca.gov](mailto:jbx@cpuc.ca.gov); [jnoiron@fs.fed.us](mailto:jnoiron@fs.fed.us); [aguadulce2006@aol.com](mailto:aguadulce2006@aol.com); [herdem@aol.com](mailto:herdem@aol.com);  
[rgarwacki@prodigy.net](mailto:rgarwacki@prodigy.net); [countryjournal@bigplanet.com](mailto:countryjournal@bigplanet.com); [reedterito@aol.com](mailto:reedterito@aol.com);  
[maryjohnson@cwaveisp.net](mailto:maryjohnson@cwaveisp.net); [andyjudy@as.net](mailto:andyjudy@as.net); [mharnett@wcclaw.com](mailto:mharnett@wcclaw.com)

**cc:** [cmoore@coxcastle.com](mailto:cmoore@coxcastle.com); [mike.mackness@sce.com](mailto:mike.mackness@sce.com); [meallen@sempra.com](mailto:meallen@sempra.com); [lau@cpuc.ca.gov](mailto:lau@cpuc.ca.gov);  
[rmd@cpuc.ca.gov](mailto:rmd@cpuc.ca.gov); [bxlc@pge.com](mailto:bxlc@pge.com); [jwmctarnaghan@duanemorris.com](mailto:jwmctarnaghan@duanemorris.com); [dtk5@pge.com](mailto:dtk5@pge.com);  
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[fyanney@fulbright.com](mailto:fyanney@fulbright.com); [cfaber@semprautilities.com](mailto:cfaber@semprautilities.com); [case.admin@sce.com](mailto:case.admin@sce.com); [Erin.Moore@sce.com](mailto:Erin.Moore@sce.com);  
[liddell@energyattorney.com](mailto:liddell@energyattorney.com); [ko'beirne@semprautilities.com](mailto:ko'beirne@semprautilities.com); [hal@rwitz.net](mailto:hal@rwitz.net); [califhorseman@yahoo.com](mailto:califhorseman@yahoo.com);  
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[nrader@calwea.org](mailto:nrader@calwea.org); [e-recipient@caiso.com](mailto:e-recipient@caiso.com); [grosenblum@caiso.com](mailto:grosenblum@caiso.com); [terry@water.ca.gov](mailto:terry@water.ca.gov);  
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[hcronin@water.ca.gov](mailto:hcronin@water.ca.gov); [clu@cpuc.ca.gov](mailto:clu@cpuc.ca.gov)

Diane & Mike Terito  
Page 4 of 4

Antelope-Pardee 500-kV Transmission Project  
**B. DESCRIPTION OF PROPOSED PROJECT/ACTION AND ALTERNATIVES**

towers located on hillside areas, maintenance activities could be complicated due to the difficulty of conducting maintenance on hillsides, which could increase the time and workforce required to maintain these towers and spur roads.

**B.4.6 No Project/Action Alternative**

**B.4.6.1 Background**

CEQA requires an evaluation of the No Project Alternative in order that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project (State CEQA Guidelines §15126.6(e)(1)). According to the State CEQA Guidelines §15126.6(e)(2), "The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published [(i.e., baseline environmental conditions)], or if no Notice of Preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." As required by CEQA, existing conditions that formulate the basis for the No Project Alternative analysis are described in Section C for each environmental discipline under "Environmental Setting."

NEPA requires an evaluation of the No Action Alternative (40 CFR Section 1502.14(d)) as a part of the alternatives screening process. Per NEPA regulations, the No Action Alternative must be considered even if the lead agencies are under a court order or legislative command to act. In this way, the analysis provides a benchmark for decision makers to compare the environmental effects of the action alternatives. NEPA describes two interpretations of "no action": one where the present course of action continues until that action changes (such as ownership or management); and one where the proposed activity would not take place. Regardless of the interpretation applied to the proposed Project, the environmental effects of the No Action Alternative are compared to the environmental effects of allowing the Project to be implemented in each of the action alternatives.

**B.4.6.2 No Project/Action Alternative Scenarios**

Selection of the No Project/Action Alternative would mean that the Antelope-Pardee 500-kV Transmission Project, as proposed, would not be implemented and the Forest Service would deny the special use application. No Forest Plan amendments would occur through this Project. As such, none of the associated Project activities would occur and the environmental impacts associated with the Project would not occur. For example, SCE's existing Antelope Pole Switch 74 66-kV line along the Saugus-Del Sur utility corridor would remain in place, as removal of the 66-kV line is specifically linked to the construction of the Project (It should be noted that the USDA Forest Service's Special Use Permit for the 66-kV line has expired). As such, the environmental impacts associated with the Project, as described in Section C, would not occur. SCE's and CPUC's objectives for the Project would remain unfulfilled under the No Project/Action Alternative. For example, the 350 MW of initial transmission capability when energized to 220 kV would not be added between the Antelope and Pardee Substations, and the improved system reliability and operating flexibility associated with the Project would not occur.

As discussed in Section A.3.1 (SCE: Purpose and Need), in the absence of the Project, SCE still would be required to interconnect and integrate power generation facilities into its electric system, as required under Sections 210 and 212 of the Federal Power Act (16 U.S.C. § 824 [i] and [k]) and Sections 3.2 and 5.7 of the CAISO's Tariff. According to SCE, several wind generation projects either have applications pending before

*Terito - Enclosure page 1 of 2*

**Antelope-Pardee 500-kV Transmission Project**  
**B. DESCRIPTION OF PROPOSED PROJECT/ACTION AND ALTERNATIVES**

Kern County or are in the advanced planning stage and expected to submit applications in the near future. Due to their locations, these upcoming wind generation projects will need to interconnect to the SCE transmission system via Antelope Substation or some other new substation located in the vicinity to allow power to be delivered to load in the Los Angeles area. However, these wind generation projects cannot be interconnected to the SCE transmission system without an increase in transmission capacity south of Antelope Substation. Transmission of wind power from the Tehachapi and Antelope Valley areas is currently constrained by the existing Antelope-Mesa 220-kV transmission line, which would be overloaded by the addition of new wind generation. Therefore, without upgrades to the existing system, as new facilities are added to meet the power needs of southern California, SCE's system would experience system-wide power flow and reliability problems due to overloading of the existing system, such as curtailed generation, thermal overload, and blackouts. It should be noted that connection to the transmission systems of other power utilities (such as PG&E or LADWP) is possible but would not meet SCE's objectives for the Project and would not fulfill the goals of the Tehachapi Collaborative Study Group (see Sections A.3.1 and A.3.2).

Under the No Project/Action Alternative, the following events or actions (scenarios) related to the electricity generation and transmission are reasonably expected to occur in the foreseeable future:

- Initial wind projects in the Antelope Valley and Tehachapi areas would be postponed or cancelled, as additional transmission capacity would not be available, or these proposed wind projects would have to find alternate means to connect to SCE's transmission system without compromising system reliability.
- The requirement of the Renewables Portfolio Standard (RPS), which requires retail sellers of electricity such as SCE and PG&E to increase their sale of electricity produced by renewable energy sources to 20 percent by 2010 (updated from 2017 to 2010 per the Energy Action Plan), may not be achieved as access to renewable energy from the Antelope Valley-Tehachapi region would either not be provided or would be delayed.
- Other renewable energy resources would need to be identified and transmission studies would need to be conducted to connect these newly identified sources to the transmission grid, which would likely further limit achievement of the RPS goal by the 2010 deadline.
- The conceptual plan recommended by the TCSG would not be fully implemented. This plan is intended to collect power from Tehachapi area wind projects, interconnect facilities into the state's backbone grid, and upgrade the network to reliably deliver that power to load centers. The conceptual plan, which would allow for the transmission of over 4,000 MW of wind power, would not be fully achieved because the initial capacity that would have been provided by the proposed Project for transmitting 350 MW of power would not be achieved.
- Transmission providers such as SCE, PG&E, or LADWP would need to accommodate the power load by upgrading existing transmission infrastructure or building new transmission facilities along a different alignment and/or developers of wind generation facilities would need to build their own transmission facilities to connect to the transmission grid.

**B.4.7 Project and Alternatives Components Summary**

Table B.4-23 provides a summary of the components of the proposed Project presented in Section B.2 with the alternatives presented in Sections B.4.1 through B.4.6. Components located on NFS lands are explicitly identified.

*Terito - Enclosure page 2 of 2*

## Response to Comment Set C.171: Diane A. and Michael W. Terito

- C.171-1 Thank you for your opinion regarding Alternative 5.
- C.171-2 The analysis presented in the Draft EIR/EIS is considered complete and adequate to meet the requirements of both CEQA and NEPA. The analysis in the Draft EIR/EIS does not indicate that additional information is needed to reach conclusions regarding impacts – the necessary analysis and impact conclusions are presented in the Draft EIR/EIS.
- C.171-3 Your concern regarding additional alternatives will be shared with the decision-makers who are reviewing the proposed Project and alternatives at the USDA Forest Service and the CPUC. A number of alternative routes were identified during the Scoping process to avoid the impacts of SCE's proposed Project. See General Response GR-4 regarding the alternatives identification process for the Project. The Draft EIR/EIS complies with Section 1502.14 of the CEQ regulations in that the proposed Project, the No Action Alternative, a reasonable range of alternatives are identified and analyzed in the document. Additionally, those alternatives that were identified but eliminated from detailed analysis were addressed in Section B.3.4. Also see the responses to Comments C.8-4 and C.8-6 regarding the City of Santa Clarita alternative.