

## Comment Set C.184: Geral Dickey

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BY:.....

September 30, 2006

Marian Kadota  
USDA Forest Service  
NEPA Project Manager  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

Ms. Kadota:

I am writing to voice my opposition to the proposed Antelope-Pardee 500-KV Transmission Project Alternative #5.

While I recognize the need to increase the use of non-polluting energy sources such as windmills, to help satisfy our society's endless thirst for more and more electricity, this alternative would have negative affects on me, on my family, and on my neighbors.

This tower line would make it impossible for aircraft to be used to fight a fire at my house, or at those of my neighbors on 107<sup>th</sup> Street West, and Lonesome Valley Road, and Lost Canyon Road.

C.184-1

This would be a disaster waiting to happen, as there are no city water lines, or fire hydrants available. Also, this might make it impossible for residents in the steep brush filled canyons to obtain fire insurance

The close proximity of the tower line as it crosses 107<sup>th</sup> Street West would spoil what is now a beautiful scenic view.

It will subject me and my family and neighbors to EMFs with recognized detrimental health consequences.

C.184-2

The grading, construction and maintenance will create erosion and water runoff problems, in this sandy, alluvial soil.

C.184-3

The high voltage lines create noise due to corona, and although not mentioned in the EIR/S, they also produce a howling noise during high winds, which occur almost daily along 107<sup>th</sup> Street West. In addition, they would cause severe radio reception problems.

(2)

The inspection and maintenance of these lines, much of which is done by helicopter, would produce even more noise, and danger.

The access roads would invite motorcycles and off road vehicles causing abuses such as dust, noise, and trespassing on private property.

Property values of all residents in the area, would definitely be reduced, but even more drastically for those closest to the proposed towers and lines. | C.184-4

The negative impacts as stated are bad, nevertheless they pale in comparison when considering that some families will be forced from their homes. | C.184-5

I realize that there are many different aspects of this project that must be considered and their impacts evaluated and prioritized. I know this will be done differently by people with diverse interests and points of view.

I have enclosed a copy of a document addressed to Regional Foresters from Mr. Jack L. Craven, Director of Lands, U.S. Department of Agriculture, dated January 24, 2003. The subject is "Advice in Responding to and Evaluating Proposals and Applications for Energy and Energy Related Facilities." I feel that this document is pertinent to the decision that you are about to render.

From my point of view, the Edison proposal is by far the best choice. However, if after careful consideration of this project, you decide that you cannot grant the original Edison proposal, so be it. But please don't try to impose Alternative 5, with its greater number of negative impacts on the hundreds of people who live along that route. | C.184-6

Enc.

Sincerely,



Geral Dickey  
39913 107<sup>th</sup> Street West  
Leona Valley, CA 93551  
(661) 270-0649

I would like to comment on the inaccuracy of the description of Alternative 5, page ES-11 in the Executive Summary of the Draft Environmental Impact Report/Statement. The description omits the portion from 107<sup>th</sup> street West going generally eastward through Lost Canyon, before turning south crossing Bouquet Canyon Road, then entering the western portion of the Ritter Ranch Development Area.



United States  
Department of  
Agriculture

Forest  
Service

Washington Office

14<sup>th</sup> & Independence SW  
P.O. Box 96090  
Washington, DC 20090-6090

File Code: 2700  
Route To:

Date: January 24, 2003

Subject: Advice in Responding to and Evaluating Proposals and Applications for Energy and Energy Related Facilities

To: Regional Foresters

Important goals of the May 2001, National Energy Policy (NEP) are to increase domestic energy supplies, modernize and improve our nation's energy infrastructure, and improve the reliability of the delivery of energy from its sources to points of use. 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 goals. This should be an important consideration when responding to proposals for the siting of energy and energy related facilities on NFS lands.

#### Evaluating Energy and Energy Related Proposals

Our regulations at 36 CFR 251.54(e) direct that all special use proposals must meet two levels of screening criteria before they can be accepted and processed as an application. One of those criterion requires that the proposed use be "consistent with laws, regulations, orders, and policies establishing or governing NFS lands, with other applicable Federal law, and with applicable State and local health and sanitation laws".

One of our special uses policy statements, at FSM 2703, directs that an authorized officer may deny a proposal if it "can reasonably be accommodated on non-NFS lands..." and not to authorize a special use of NFS lands just because it affords the applicant a lower cost and less restrictive location when compared to non-NFS lands.

Special use administrators and line officers must be aware that this policy does not authorize the rejection of a proposal just because a facility can be feasibly built without the need to use or occupy NFS lands. Because the NEP envisions that the use and occupancy of Federal lands can help to meet the nation's energy goals and objectives, authorized officers should exercise prudence when rejecting proposals for energy and energy related projects on the sole basis that such a project can be accommodated on non-NFS lands.

The differences in the environmental, social, and economic effects between constructing an energy project or facility on non-NFS lands as opposed to where it is being proposed on NFS lands are important considerations. In some cases, siting a project on NFS land may minimize or mitigate many of these effects due to its location, aspect, topography, etc. An example might be the proposed siting of an electric transmission line on NFS land, where it would have a less visually obtrusive impact on the landscape, and provide for greater public safety, as opposed to an alternative, yet feasible, siting of that same facility on nearby non-NFS land, where doing so might result in numerous user conflicts and proximity to hazards.



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When there is inadequate or inconclusive information or data to support a pre-application finding that the proposed energy or energy related facility can be reasonably accommodated on non-NFS land, further evaluation is appropriate. If the proposal meets all of the other pre-application screening criteria, then it should be accepted as an application, and processed accordingly. The public scoping and environmental analysis of alternatives should subsequently provide the information needed to identify, and fully disclose to the public and the applicant, whether the proposal can be reasonably accommodated on non-NFS lands. The documentation of that analysis is the basis for the authorized officer to make a decision whether to deny or approve the proposed use and occupancy of NFS lands.

Deferring to the Federal Energy Regulatory Commission's (FERC's) Procedures for Interstate Natural Gas Pipeline Proposals

In 2002, the USDA and numerous other Federal agencies and departments signed an inter-Agency agreement for the processing of proposals for interstate natural gas pipeline projects. That agreement directs that the FERC will be the lead agency when responding to proposals for such projects. When a proposal for an interstate natural gas pipeline project includes a proposed routing over NFS lands, the Forest Service will defer to the FERC's procedures in responding to such proposals, rather than applying our pre-application screening criteria at 36 CFR 251.54(e).

An interim directive providing additional information concerning the Forest Service's roles and responsibilities pursuant to this interagency agreement will be issued in the near future.

Deferring to the Designated Lead Federal Agency for Other Inter-Agency Special Use Proposals

Many other energy and energy related proposals will involve the proposed use and occupancy of Federal lands administered by more than one Federal agency. For oil or gas pipeline projects (other than interstate natural gas pipeline projects), the lead agency will commonly be the Bureau of Land Management (BLM). For inter-Agency electric transmission, solar, or wind energy projects, the lead agency could be the Forest Service, the BLM, the Department of Energy (for cross-border/international projects), or some other Federal agency. When another Federal agency is designated as the lead for an energy or energy related project, the Forest Service should follow the lead agency's procedures in responding to such proposals.

If you or your staff have any questions or concerns, please contact Randy Karstaedt, Special Uses Program Leader on my staff, at (202) 205-1256.

/s/ Jack L. Craven  
JACK L. CRAVEN  
Director of Lands

## Response to Comment Set C.184: Geral Dickey

- C.184-1 We recognize that Alternative 5 would constrain the ability to aggressively fight a wildland fire in the vicinity of the route, and could create additional fire risks to inhabited areas such as Leona Valley and Agua Dulce (see discussion in Section D.5). Your concerns will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- C.184-2 Please see General Response GR-3 regarding EMF concerns.
- C.184-3 Your comment is consistent with the Draft EIR/EIS discussions.
- C.184-4 Please see General Response GR-1 regarding potential effects on property values.
- C.184-5 As discussed in Section C.9.10.2, the alternative alignment would be constructed across 103 privately owned parcels. The majority of land uses that would be restricted as a result of Alternative 5 would be the erection of new structures within the alternative ROW. However, given that SCE has not conducted construction or final alignment and design studies for Alternative 5, the EIR/EIS has assumed that the removal of one or more homes may occur. As such, Section C.9.10.2 (Impact L-3) concluded that potential impacts to residential land uses as a result of Alternative 5 would be significant and unavoidable.
- C.184-6 Thank you for your opinion regarding the proposed Project and Alternative 5.