

Comment Set E.21: Applicant – Appendix 1 Alternatives Screening Report

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
 APPENDIX 1 ALTERNATIVES SCREENING REPORT**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	2.1.1	Ap.1-4	Bullet 7	<p>SCE would be willing to consider the use of tubular steel poles rather than lattice steel towers in the portions of the Antelope Valley and City of Santa Clarita as technically feasible. Some of the larger structures (ie. structures at angle points where the transmission line changes direction) may need to be lattice steel towers.</p> <p>SCE would like to clarify that the use of tubular steel poles does not necessarily reduce EMF. Rather, it is the conductor configuration typically used on tubular steel poles that can reduce EMF.</p>	<p>In initial comments and as a result of the scoping process the Brunet Family requested several items in a letter dated July 19, 2005. This letter appears in Appendix D-3 of the Scoping Report for Southern California Edison Company's Proposed Antelope-Pardee 500-kV Transmission Project, prepared by Aspen Environmental Group and released by the CPUC and USDA in August Of 2005.</p> <p>The letter requests the following considerations:</p> <ul style="list-style-type: none"> • Reroute of the existing 12kV line from the proposed location in the 500kV R-O-W to a franchise location along existing streets. • Use Tubular Steel Towers (TSP) from Antelope to approximately T-102. • Realignment of the T/L route on their property. <p>SCE does not object to these requests; however there is only vague reference to the revised 12 kV route (in description B.2.1.1 and B.2.2.1) and TSP's (in V-1a and visual simulation KOP2 page 3). There is no mention of the alignment change to avoid the house. SCE requests that the CUPC and USDA consider these requests in the final EIR/EIS.</p>

E.21-1

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2	3.2.2	Ap.1-35 through 39		The Antelope-Pardee Underground Alternative (described on pages Ap.1-21 through 35) was eliminated as a feasible alternative because "construction would cause substantial disturbance to NFS land and the construction schedule would be delayed extensively (at least 6 months for procurement), which would not meet the recommendations of the California Energy Commission's 2005 IEPR, which states that the Antelope-Pardee Transmission Project ("Phase 1") should move forward "expeditiously".	Alternative 1 should have been eliminated for these same reasons.	E.21-2
4	3.3.1	Ap. 1-54		One of the reasons cited for elimination of this alternative (Parallel LADWP ROW) is that "it would pass in very close proximity to residences in Leona Valley, Green Valley, and Haskell Canyon thereby increasing potential land use and short-term construction impacts to sensitive receptors."	This reasoning should have been used to eliminate Alternative 5.	E.21-4
5	3.3.5.	Ap. 1-63		One of the reasons cited for retention of this alternative is that "Extensive use of the existing Pardee-Vincent transmission corridor would substantially reduce resource/issue specific impacts".	This reasoning should have been used in support of the proposed Project as the environmentally preferred project.	E.21-5

Response to Comment Set E.21: Applicant – Appendix 1 Alternatives Screening Report

E.21-1 **[Note to CPUC & ANF Reviewers: The response to this comment regarding the *Hybrid Route Alternative* recommended by the Brunets is currently in preparation.]**

E.21-2 In addition to causing substantial disturbance to NFS land and delaying the construction schedule, the Antelope-Pardee Underground Alternative was also eliminated because of reliability concerns associated with the steep slopes in the ANF over the proposed 12.9 miles and the high cost of underground construction over such a long length. While the Antelope-Pardee Partial Underground Alternative, which became Alternative 1 of the EIR/EIS, would also delay the construction schedule (29 months for underground construction versus 13 months for the proposed Project), the Lead Agencies, namely the USDA Forest Service, felt that this impact was outweighed by the potential to remove or substantially reduce visual impacts along Del Sur Ridge upon Project completion. Furthermore, the area identified for underground construction within the ANF was chosen due to decreased slopes, which would reduce concerns related to construction on steep slopes, and construction along Del Sur Ridge would generally occur within the existing roadway, which would limit impacts to vegetation and reduce disturbance to NFS lands.

As discussed in the Alternatives Screening Report, “[t]he USDA Forest Service requested that partial undergrounding be considered for the proposed 500-kV transmission line across NFS lands in the ANF.” It was determined that while the Antelope-Pardee Partial Underground Alternative would have the potential to increase environmental impacts, specifically to biological resources, buried cultural resources, air quality, and geology and soils (erosion), these impacts would primarily be short-term construction impacts. This alternative would have the potential to reduce or eliminate visual impacts, avian electrocution and collision, and conflicts with Forest Management activities (e.g. wildland fire suppression) of the proposed Project in certain areas. The shorter length of the underground segments within this alternative (as opposed to the Antelope-Pardee Forest Underground Alternative) may not make underground technologies cost prohibitive to construct. Because this alternative generally meets the Project objectives, is considered feasible, and has the potential to reduce potentially significant visual impacts associated with the proposed Project, it was retained for analysis in the EIR/EIS.

E.21-3 Comment not provided (number skipped).

E.21-4 While the Antelope-Pardee 500-kV Line in New Corridor Alternative, which became Alternative 5, would result in impacts to Leona Valley and Agua Dulce, among others, this alternative was retained for analysis in the EIR/EIS as it would fully maintain the Project objectives, purpose and need while minimizing impacts to the ANF, which would meet USDA Forest Service requirements. Please see Response to Comment GR-4 regarding alternatives identification, screening, and analysis.

E.21-5 A comparison of the proposed Project and each of the alternatives, with respect to each of the resource/issue areas, is provided in Section D of the Draft EIR/EIS. While the proposed Project extensively uses the existing transmission line corridor between Antelope Substation and Pardee Substation, which substantially reduces some impacts, other impacts such as visual resources are

greater. As such, it was determined that the environmentally superior alternative was not the proposed Project, as discussed in Section D.5.