

**Comment Set E.2: Applicant – Executive Summary**

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT  
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS  
 ES-1 EXECUTIVE SUMMARY**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
1	ES.1.2	ES-2	Item 2, Line 3	The document incorrectly identifies ownership of the Big Creek hydroelectric generation facilities to belong to PG&E.	The document should be corrected to properly identify SCE ownership of the Big Creek hydroelectric generation facilities	E.2-1
2	ES.1.2	ES-2	Item 2, Bullet 2	The bullet can be read to imply that SCE did not consider the use of a remedial action scheme (RAS), or special protection system (SPS), as an alternative to the proposed project. SCE did not utilize an SPS because the use of an SPS is untenable in this area due to the fact that use of SPS has already been maximized for this area.	The document should be revised to clearly articulate that the use of an SPS is untenable in this area due to the fact that use of SPS has already been maximized for this area.	E.2-2
3	ES.1.2	ES-2	Footnote 1	The footnote incorrectly states that an SPS is used to decrease or increase generation.	The footnote should be modified to indicate that an SPS is used to decrease load or generation.	E.2-3
4	ES.1.2	ES-3	Paragraph 1	The Forest Service purposes (objectives) stated here do not include any reference to the Strategic Goals of the Forest Service. These Strategic Goals are discussed in the Land Management Plan Part 1 (page 15) as being "the priority goals for the Forest Service." One of the six stated priority goals listed in the Land Management Plan and taken from the Forest Service National Strategic Plan (2003 revision) is National Strategic Plan, Goal 4 "Help meet energy resource needs".	This section of the DEIR/DEIS should be rewritten to more clearly state the applicable priority goals for the National Forest as written in the Forest Service National Strategic Goals (2003 revision).	E.2-4
5	ES.2.1	ES-5	Paragraph 1	Document does not explain the term Saugus-Del Sur Utility Corridor.	The document should provide a footnote to describe the Saugus-Del Sur Utility Corridor	E.2-5

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6	ES.2.1	ES-5	Paragraph 3	The paragraph does not articulate the removal of existing single circuit 500 kV line between mile 22.3 and mile 25.6.	The last sentence should include language addressing the removal of the existing single circuit 500 kV line.	E.2-6
7	ES.2.1	ES-6	Table ES-1	SCE cannot comment on the numbers provided in the table for the alternatives since SCE did not develop these alternatives (see comments in Project Description).	Assumptions utilized to evaluate these alternatives should be included in the Project Description.	E.2-7
8	ES.2.1	ES-6	Table ES-1	The removal of 500 kV facilities is not included in the Table.	Removal of 500 kV facilities should be included in the table.	E.2-8
9	ES.2.1	ES-6	Table ES-1	12 kV facilities needed to support power supply for transition stations in Alternative 1 are not included in the Table.	12 kV facilities should be included in the table.	E.2-9
10	ES.2.1	ES-7	Table ES-1 Substation Modifications	The table appears to discuss different work requirements at Antelope for Alternatives 1 through 5 relative to the proposed project. Work at Antelope is the same for the Proposed Project and all Alternatives.	Modify description of work at Antelope Substation to state "Same as Proposed Project".	E.2-10
11	ES.2.1	ES-7	Table ES-1 Duration of Construction	Construction duration of proposed project (13 months) is incorrect.	Correct construction duration of proposed project to reflect 18 months (see SCE PEA) and adjust all other alternatives utilizing the 18 months as the baseline assumption.	E.2-11
12	ES.2.1	ES-8	Paragraph 1 Line 1	The numbers of disturbed and restored acreage (122 and 63 acres respectively) from the proposed project are inaccurate.	See comments for Table B.2-7 Estimates of Project Land Disturbance for the Proposed Project	E.2-12
13	ES.2.2	ES-8	Paragraph 1 Line 3	The Tehachapi Collaborative Study Group (TCSG) did not identify alternatives to this project. In fact, the TCSG endorsed this project as a prudent first phase.	Delete reference that states the TCSG identified alternatives to this project.	E.2-13
14	Figure ES-2	ES-10		The Figure does not illustrate the two transition stations required for the underground section in Santa Clarita for Alternative 1.	Modify Figure ES-2 to illustrate the two transition stations in Santa Clarita for Alternative 1.	E.2-14

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15	ES.2.2	ES-11	Paragraph 4 Alternative 5	The discussion of the route of Alternative 5 does not state that a portion of this route crosses Ritter Ranch Park, owned by the Mountains Recreation and Conservation Authority, a local partnership with the Santa Monica Mountains Conservancy.	Modify language to clearly state ownership of land.	E.2-15
16	ES.2.2	ES-11	Paragraph 4 Alternative 5	The description of Alternative 5 does not indicate that Alternative 5 crosses BLM land.	Modify language to include BLM land.	E.2-16
17	ES.2.2	ES-11	Paragraph 5 No Project Line 7	The USDA Forest Special Use Permit for the 66 kV line has expired as indicated. However, SCE submitted a renewal request for both the 66 kV line and the access road to the Angeles National Forest in October 2004.	Modify language to include SCE renewal request.	E.2-17
18	ES.2.2	ES-12	Paragraph 1 Line 8	The DEIR/DEIS is confusing in the description of "new facilities" to imply new wind generation development is required to "meet power needs of southern California."	Clarify document by replacing "new facilities..." with "new wind generation..." needed to "meet Renewable Portfolio Standard Program requirements."	E.2-18
19	ES.2.2	ES-12	Paragraph 1 Line 8	The DEIR/DEIS references not "fulfilling the goals of the Tehachapi Collaborative Study Group." The Tehachapi Collaborative Study Group was created by CPUC Decision 04-06-010 Ordering Paragraph No.8 and was tasked with developing a transmission plan to interconnect over 4,000 MW of wind generation in the Tehachapi area.	Modify language to indicate: "would not satisfy CPUC Decision 04-06-010."	E.2-19

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
20	ES.2.2	ES-12	Bullet 4	The DEIR/DEIS states that without the proposed project, "the conceptual plan recommended by the TCSG would not be fully implemented." Segment 1 is an integral part of the TCSG conceptual plan that is required before the rest of the conceptual plan can be implemented. This proposed project was endorsed by the TCSG as a prudent first step to allow future upgrades to be implemented by taking outages and maintaining system reliability.	Modify language to indicate that none of the future phases of the conceptual plan can be constructed without first implementing the proposed project.	E.2-20
21	ES.2.2	ES-13		For all alternatives, the DEIR/DEIS assumes the removal of the existing 66 kV line from the existing designated utility corridor. Numerous possibilities exist where the existing 66 kV line would be utilized for alternatives that do not require removal. As an example, significant load growth in the Antelope Valley will require additional load serving capability. Such load service could be provided by allowing up to 30 MW of load transfers between Antelope and Santa Clarita (Saugus Substation). In addition, the 66 kV line could be utilized for Alternative 1 to power the transition stations within the ANF by energizing the line at 12 kV.	Delete the language which automatically assumes that the 66 kV line (Antelope-Pole Switch 74) should be removed.	E.2-21
22	ES.3	ES-13	Paragraph 2 Line 6	The DEIR/DEIS incorrectly links the proposed transmission project with a specific wind energy project, the PdV Wind Energy Project.	Remove discussion of the PdV Wind Project as this project is under CEQA review at Kern County (see Comments under Section A)	E.2-22
23	ES.3.1	ES-14	Table ES-2	SCE cannot comment on the numbers provided in the table for the alternatives since SCE did not develop these alternatives (see comments in Project Description).	Assumptions utilized to evaluate these alternatives should be included in the Project Description.	E.2-23

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
24	ES.3.2	ES-15	Paragraph 2	SCE considers the potential taking of homes associated with Alternative 5 a significant socioeconomic impact and questions how the DEIR/DEIS concludes that "no key issues or differences between the alternatives have been identified..."	Modify language to indicate that Alternative 5 could result in a significant socioeconomic impact as compared to the proposed project and other alternatives.	E.2-24
25	ES.3.2	ES-15	Paragraph 5 Sentence 2 and Sentence 4	These two sentences discussing the potential adverse effects to aerial firefighting appear to be contradictory.	Modify either sentence 2 or 4 appropriate sentence to be consistent.	E.2-25
26	ES.3.2	ES-16	Paragraph 2	The language in this paragraph does not acknowledge that the existing Antelope-Pole Switch 74 66 kV line within a designated utility corridor. Furthermore, as stated above, the DEIR/DEIS incorrectly assumes the removal of the existing 66 kV line.	Modify language to address the fact that the existing 66 kV line is within a designated utility corridor.	E.2-26
27	ES.3.2	ES-16	Table ES-5	See comments under applicable environmental impact sections.		E.2-27
28	ES.3.5	ES-18	Paragraph 3	SCE is constructing the project in order to assist the State of California in meeting the RPS mandated target goals.	The document should be clarified to factually state that the PdV Wind Energy Project is a direct effect of the state legislated RPS requirements and that SCE's transmission project is therefore an indirect effect of the RPS legislation.	E.2-28

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
29	ES.3.5	ES-19	Paragraph 2	The document incorrectly links the proposed transmission project with a specific wind energy project, the PdV Wind Energy Project. The document should be clarified to state that the project is not required for certain wind energy resources but is rather needed to support numerous potential wind energy resources that may develop in the several areas of Kern County and/or northern Los Angeles County. In other words, this project is needed to utilize Tehachapi area's potential for renewable resources to help meet state mandated RPS goals with the first wind energy project identified as the PdV Wind Energy Project.	All references that link the PdV Wind Energy Project to the proposed project, including the analysis of the potential impacts of the PdV Wind Energy Project (Section E.3), should be deleted since this project is not a direct or indirect effect of the proposed project for reasons explained above, and is currently being reviewed at Kern County.	E.2-29
30	ES.4.2	ES-21	Biological Resources Alternative 5	The document assumes that Alternative 5 is located in habitats characterized by greater disturbance than the other Alternatives. This does not appear to take into account that this alternative crosses open space lands owned by SMMC, ANF, and BLM.	Impact to biological resources associated with Alternative 5 should be modified to account for these open space lands.	E.2-30
31	ES.4.2	ES-23	Forest Management Activities Bullet 4	The DEIR/DEIS states that the proposed Project would not result in any benefits to Forest Management activities, however the proposed Project would help to meet one of the six stated Strategic Goals of the Forest Service – "National Strategic Plan, Goal 4 Help Meet energy resource needs". These Strategic Goals are discussed in the Land Management Plan Part 1 (page 15) and taken from the Forest Service National Strategic Plan (2003 revision).	This section of the DEIR/DEIS should be rewritten to more clearly state all of the applicable priority goals for the National Forest as written in the Forest Service National Strategic Goals (2003 revision).	E.2-31
32	ES4.2	ES-24	Land Use and Public Recreation Bullet 2	The bullet is unclear in discussing what is intended in the statement: "would permanently preclude private land."	Clarify intent of this statement.	E.2-32

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
33	ES.4.2	ES-25	Public Services Bullet 1	It appears that the transition stations were not considered when considering the potential fire risk resulting from Alternative 1	Modify this language to account for the transition stations.	E.2-33
34	ES.4.2	ES-25	Public Services Bullet 2	The DEIR/DEIS incorrectly assumes that single circuit tower lines have a lower ground clearance relative to double circuit tower lines. Both single-circuit and double-circuit tower lines are constructed utilizing CPUC General Order 95 clearance requirements thereby resulting in the same ground clearance (i.e. the lower conductor of a double-circuit tower line is at the same height as compared to a single-circuit tower line).	Modify this language to indicate risk that the potential fire hazard related to transmission line contact with vegetation is identical for both single circuit and double circuit construction.	E.2-34
35	ES.4.2	ES-26	Visual Resources Bullet 1	This bullet addresses only the visual impacts within the ANF but fails to address the visual impacts to residents of Leona Valley and Agua Dulce	Modify language to include potential visual impacts to private property owners in the communities of Leona Valley and Agua Dulce.	E.2-35
36	ES.4.3	ES-29	Bullet 2	The DEIR/DEIS incorrectly states that both Alternative 2 and Alternative 5 have soils with a "severe" hazard rating for erosion. According to the Soil Survey of Angeles National Forest Area, California, 1980, the soils are ranked either as Low EHR (erosion hazard rating), Moderate EHR, High EHR, or Very High EHR. The rating of "Severe" is not listed as a rating. Also, the range of EHR through ANF lands varies from Moderate to Very High (see comments for Section C.5).	Modify the DEIR/DEIS language to properly characterize the soils classification.	E.2-36
37	ES	ES-31 to ES-67	Table ES-3	Comments are included in appropriate sections		E.2-37
38	ES	ES-68 to ES-74	Table ES-4	Comments are included in appropriate sections		E.2-38

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
39	ES	ES-75 to ES-78	Table ES-6	Comments are included in appropriate sections		E.2-39
40	ES	ES-79 to ES-88	Table ES-7	Comments are included in appropriate sections		E.2-40
41	ES	ES-89	Table ES-8	Comments are included in appropriate sections		E.2-41
42	ES	ES-90 To ES-92	Table ES-9	SCE is constructing the project in order to assist the State of California in meeting the RPS mandated target goals. The document therefore incorrectly links the proposed transmission project with a specific wind energy project, the PdV Wind Energy Project.	Table ES-9 should be deleted since this project is not a direct or indirect effect of the proposed project, and is currently being reviewed at Kern County.	E.2-42
43	ES	ES-93 To ES-97	Table ES-10	Comments are included in appropriate sections		E.2-43

## Response to Comment Set E.2: Applicant – Executive Summary

- E.2-1 Please see the response to Comment E.3-20. This has been corrected.
- E.2-2 Please see the response to Comment E.3-24.
- E.2-3 Thank you. This has been corrected.
- E.2-4 Please see the response to Comment E.3-27.
- E.2-5 It is inherent in the name that the “Saugus-Del Sur Utility Corridor” is an existing utility corridor. No further explanation is required.
- E.2-6 Thank you. This has been corrected.
- E.2-7 As noted in Section B, alternatives to the proposed Project were developed by the EIR/EIS preparers. Details for each alternative, as presented in Table ES-1, were derived from preliminary design concepts. Numbers are subject to change as the design is finalized.
- E.2-8 Table ES-1 (and Table B.4-23) has been updated to include removal of 500-kV single-circuit towers within the Pardee-Vincent corridor.
- E.2-9 Details of Alternative 1 with respect to 12-kV infrastructure would be determined during detailed design, and as such have not been included in Table ES-1.
- E.2-10 Table ES-1 has been updated to show the same work requirements at Antelope Substation for the proposed Project and all the alternatives.
- E.2-11 Please see the response to Comment E.4-3 regarding the 13-month construction schedule.
- E.2-12 Please see the response to Comment E.4-15 and E.4-16 regarding land disturbance numbers generated for the proposed Project (Table B.2-7).
- E.2-13 Among the alternatives considered for the Project, one identified by the Tehachapi Collaborative Study Group – the “Big Creek-Fresno Phase-Shifted Tie”. Refer to Appendix 1, Alternatives Screening Report.
- E.2-14 Figure ES-2 has been updated to show the transition station at Mile 22.7. Please see the response to Comment E.4-24 regarding the need for a transition station at the Pardee Substation.
- E.2-15 The communities and lands traversed by Alternative 5 are discussed in detail in Section C.9.10, Land Use and Public Recreation.
- E.2-16 Please see the response to Comment E.2-15.
- E.2-17 While the renewal request has been made, a new permit has not been issued. As such the text reflects the current status of the 66-kV line. The USDA Forest Service reviewed and approved the language in the Draft EIR/EIS. The requested modifications to the EIR/EIS language have not been made.
- E.2-18 The wording modification has been included in the Final EIR/EIS.
- E.2-19 The wording modification has been included in the Final EIR/EIS.

- E.2-20 The EIR/EIS preparers understand that the proposed Project is part of the conceptual transmission plan recommended by the Tehachapi Collaborative Study Group (TCSG). However, as discussed in the response to Comment B.12-2, the proposed Project has its own objectives and also has independent utility. As the first transmission upgrade recommended in the TCSG conceptual transmission plan, it is an important first step in a series of transmission upgrades that would be needed in the future in order to fully utilize the wind energy potential of the Tehachapi area. However, the need for the transmission upgrades recommended by the TCSG is primarily related to the need to accommodate anticipated wind energy generation in the future rather than the need to construct the Antelope-Pardee Project.
- E.2-21 Removal of the existing Antelope-Pole Switch 74 66-kV line was included in SCE's proposed Project and has been included as part of all the alternatives per the request of the USDA Forest Service. No Project alternatives considered maintaining the 66-kV line.
- E.2-22 Please see the response to Comment E.3-3. The fact that the PdV Wind Energy Project is under review by Kern County is not relevant.
- E.2-23 As noted in Section B, alternatives to the proposed Project were developed by the EIR/EIS preparers. Details for each alternative, as presented in Table ES-2, were derived from preliminary design concepts. Numbers are subject to change as the design is finalized.
- E.2-24 Section ES.3.2 discusses impacts as they relate to National Forest System lands only. Within this region of the Project, no homes would be taken on NFS lands, and as such the conclusion of no key issues ore differences between the alternatives for socioeconomics is correct. The requested modification to the EIR/EIS language has not been made.
- E.2-25 The discussion states that Alternative 2 would (1) have potentially greater adverse effects to (or due to) aerial fire fighting activities during construction, but would (2) avoid the Saugus Del Sur Ridge Fuelbreak and therefore reduce potential conflicts with aerial and ground-based fire fighting activities in the vicinity of Saugus Del Sur Ridge and Bouquet Reservoir. The first statement considers only construction, whereas the second statement considers operations and impacts to fire fighting activities in very specific locations (Saugus Del Sur Ridge and Bouquet Reservoir) only.
- E.2-26 The fact that the 66-kV line that will be removed as part of Alternative 5 is in a designated utility corridor is not important to the discussion.
- E.2-27 Table ES-5 has been updated as appropriate.
- E.2-28 Please see the response to Comment E.3-3.
- E.2-29 See the response to Comment E.3-3. The fact that the PdV Wind Energy Project is under review by Kern County is not relevant.
- E.2-30 Section C.3.10.1.3 of the Draft EIR/EIS provides descriptions of the vegetative communities located along the Alternative 5 alignment. The text referenced in the Executive Summary provides general information regarding site conditions and is not intended to fully describe the Alternative 5 alignment.
- E.2-31 As described in the first paragraph of Section C.7, Forest Management Activities, the Forest Management Activities section focuses on wildland fire suppression and fire prevention. Section

ES.4.2, Impacts Comparison, and Section D.4.6, Forest Management Activities, have been revised to clarify this focus within the context of the comparison of the alternatives.

The text in Sections ES.4.2 and D.4.6 has been updated as follows:

*“Proposed Project/Alternative 3/Alternative 4.* The proposed Project would not result in any benefits to fire prevention or fire suppression ~~Forest Management Activities~~ and with the overhead transmission line traversing the NFS lands would result in a wide variety of adverse impacts to these activities ~~Forest Management Activities~~. As the route of the transmission line through the NFS lands would be largely the same as the proposed Project, Alternatives 3 and 4 would have the same impacts as the proposed Project.”

E.2-32 The text has been updated to read: “Although the proposed Project, Alternative 2, and Alternative 3 would permanently preclude or restrict current and future land uses on private land, they would not require the removal of existing residences.” Section D has also been updated to reflect this change.

E.2-33 Taking into account the fact that aboveground transition stations would remain a risk for the transmission line starting a fire, the text has been revised to state that “locating the transmission line underground for portions of the route substantially reduces ~~eliminates~~ the risk of the transmission line starting a fire.”

E.2-34 As shown below, the text in Section ES.4.2 has been modified to reflect that because the conductors of the single-circuit towers would be at the same height as the lowest conductors on the double-circuit towers, the proposed Project, Alternative 3, and Alternative 4 would have the same impacts on Public Services. The text in Section D.4.10 has also been revised.

- ~~• *Alternative 3.* Alternative 3 would result in slightly reduced impacts to public service facilities serving the proposed transmission line route as those associated with the proposed Project due to the construction of single circuit towers versus double circuit towers associated with the proposed Project. Smaller transmission line towers would result in a slight decrease in potential fire hazards related to transmission line contact with vegetation.~~
- *Proposed Project/Alternative 3/Alternative 4.* With the entire length of the proposed Project transmission line located overhead and configured as double-circuit towers, the fire risks associated with the proposed Project would result in a greater demand on fire protection services than Alternatives 1 ~~and 3~~. Alternative 4 would result in the same impacts to Public Services as the proposed Project. While Alternative 3 would be strung on single-circuit towers rather than double-circuit towers, the conductors on the single-circuit towers would be at the same height as the lowest conductor on the double-circuit towers. Consequently, Alternative 3 would result in the same impacts to Public Services as the proposed Project.

E.2-35 The language has been modified to address visual impacts to residents of Leona Valley and Agua Dulce, as follows:

“Furthermore, Alternative 5 would avoid the Veluzat Motion Picture Ranch, although it would create significant, unavoidable visual impacts to non-NFS lands along the route, including in the communities of Leona Valley and Agua Dulce.”

E.2-36 No change made. Please see response to Comment E.8-5.

E.2-37 Table ES-3 has been updated as appropriate.

E.2-38 Table ES-4 has been updated as appropriate.

- E.2-39 Table ES-6 has been updated as appropriate.
- E.2-40 Table ES-7 has been updated as appropriate.
- E.2-41 Table ES-8 has been updated as appropriate.
- E.2-42 See the response to Comment E.3-3.
- E.2-43 Table ES-10 has been updated as appropriate.