

**Comment Set E.3: Applicant – Introduction**

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT  
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS  
 A. INTRODUCTION**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
1	A.1	A-1	Paragraph 2 Line 2	The Antelope-Pardee T/L is incorrectly labeled as "500-kilowatt (kW)"	Correct language to state "Antelope-Pardee 500-kilovolt (kV)"	E.3-1
2	A.2.1	A-2	Bullet 5	The bullet does not properly identify the ultimate voltage rating of Antelope Substation	Include language to identify increasing the rating of Antelope Substation from 220 kV to 500 kV	E.3-2
3	A.2.1	A-2	2nd paragraph, 1st Sentence	The DEIR/DEIS incorrectly links the proposed transmission project with a specific wind energy project.	The DEIR/DEIS 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 simply 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.	E.3-3
4	A.2.1	A-2	2nd paragraph, 1st Sentence	The DEIR/DEIS is confusing in the description of the need for the project to imply that new transmission capacity is required "for utilization by southern California residents and businesses."	Clarify DEIR/DEIS by replacing "for utilization by southern California residents and businesses." with "in response to the State of California Renewable Portfolio Standard Program requirements."	E.3-4
5	A.1	A-2	4 <sup>th</sup> Paragraph 2 <sup>nd</sup> Sentence	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	E.3-5

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
6	A.2.1	A.2	3rd paragraph, 1st Sentence	The DEIR/DEIS incorrectly states the CAISO is the entity responsible for wind generation development and associated wind generation forecasts.	The DEIR/DEIS should be clarified to properly identify the role of the CAISO as it pertains to wind generation development in Tehachapi. The CAISO does not "estimate" how much total wind energy is to be developed in the area but rather manages the generation interconnection queue. This queue consists of new generation projects proposed by independent power producers placed in priority order based on submittal of a completed interconnection application. As of the date of this DEIR/DEIS there was a total of 2,122 MW of wind generation in the CAISO interconnection queue.
7	A.2.1	A-2	Footnote 2	Footnote 2 "Another wind energy project, the Aero Wind Energy Project, had previously submitted an application to Kern County, but that application was not considered active by the County at the time this EIR/EIS was initiated. Because it is not located near an existing SCE transmission line, it is unlikely that the Aero Wind Energy Project could be directly served by the proposed Project," is factually incorrect.  The proposed project can in fact support wind generation projects that are currently not located near existing transmission facilities. As an example, Segment 3 of the Antelope Transmission Project will allow for the interconnection of new wind energy projects such as the Aero Wind Energy Project with delivery to Antelope. Additional south of Antelope capability, which is provided by Segment 1 of the Antelope Transmission Project, would then be required to deliver the output the utilities' load centers.	Delete Footnote 2

E.3-6

E.3-7

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
8	A.2.2	A-3	Alternative 1, Line 4	It appears that the transition stations and associated required overhead 12 kV distribution line were not considered when considering the potential avian electrocution resulting from Alternative 1	Modify this language to account for the transition stations and associated overhead 12 kV distribution lines.	E.3-8
9	A.2.2	A-3	Alternative 2	<p>The DEIR/DEIS incorrectly states that Alternative 2 is "less visible to the public".</p> <p>While it is true the line would not be sky-lined in this option, the line will be closer to Bouquet Canyon Road and therefore potentially larger in scale and more visible to the public.</p> <p>In addition, this alternative crosses both Bouquet Canyon Road and Spunky Canyon Road increasing the visibility of this alternative to the public.</p>	The DEIR/DEIS should incorporate these facts.	E.3-9
10	A.2.2	A-4	Paragraph 3	The description of Alternative 4 is different than the proposed reroute that was provided to Aspen by SCE on May 2, 2006. SCE believes that the SCE proposed reroute is superior because it addresses issues that McMillin Land Development raised with SCE about the proposed project. In addition, the SCE proposed reroute locates the newly proposed SCE transmission line adjacent to the existing LADWP transmission lines thereby reducing new visual impacts near the movie ranch as compared to the proposed project.	The DEIR/DEIS should incorporate SCE's proposed reroute.	E.3-10

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
11	A.2.2	A-4	Paragraph 4	The description of Alternative 5 is misleading because the total mileage of the transmission line is stated last.	The DEIR/DEIS should be clarified to properly identify this alternative to consists of a 37-mile transmission line to be constructed on 19 miles of new right-of-way and 18 miles of existing SCE right-of-way. Please state the length of transmission line, 37 miles, at the beginning of the paragraph followed by the length of new/existing ROW.	E.3-11
12	A.2.2	A-4	Paragraph 4	The description of lands traversed on Alternative 5 does not clearly identify the Santa Monica Mountains Conservancy (SMMC) property.	The DEIR/DEIS should be clarified to properly identify ownership by SMMC.	E.3-12
13	A.2.2	A-4	Paragraph 4	SCE does not believe this is a reasonable alternative. Per the Council on Environmental Quality (CEQ) Guidance Regarding NEPA Regulation, "NEPA has never been interpreted to require examination of purely conjectural possibilities whose implementation is deemed remote and speculative. Rather, the agency's duty is to consider alternatives as they exist and are likely to exist." Given the fact that Alternative 5 is likely to adversely affect numerous residents, implementation of this alternative may be deemed remote and speculative.	Alternative 5 should be removed as a feasible alternative from the DEIR/DEIS (i.e. considered but dismissed).	E.3-13
14	A.2.2	A-5	Paragraph 1	The DEIR/DEIS provides a discussion of routing Alternative 5 through a small section of ANF "in order to avoid direct impacts to residences near the ANF boundary in the Leona Valley." The DEIR/DEIS, however, impacts other residences not near the ANF boundary in the Leona Valley and Agua Dulce Communities.	Alternative 5 should be removed as a feasible alternative from the DEIR/DEIS (i.e. considered but dismissed).	E.3-14

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
15	A.2.2	A-5	Paragraph 1	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.3-15
16	A.2.2	A-5	Paragraph 1	The DEIR/DEIS does not identify the need to obtain a Grant of Easement from the SMMC.	The DEIR/DEIS should be clarified to include the need for the SMMC to issue a Grant of Easement to SCE.	E.3-16
17	A.3	A-5 to A-14		Given that this is SCE's proposed project, the DEIR/DEIS should contain only one purpose and need statement (SCE's). This is supported the Forest Service Handbook 1909.15-Environmental Policy and Procedures Handbook Chapter 20-Environmental Impact Statements and Related Documents Section 22.3 Item 4 Purpose and Need (September 29, 2005). The language states "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action. (40 CFR 1502.13)"	The DEIR/DEIS should be modified to include a separate section that could be titled "Lead Agencies' Statement of Objectives" and include the discussion of CPUC and USDA Forest Service purpose in evaluating a proposed project/action.	E.3-17
18	A.3.1	A-6	2nd Paragraph, 6th Sentence	The DEIR/DEIS incorrectly states the project is needed in order to "supply customers in SCE's service region."	In accordance with SCE's stated purpose and need for the project, modify the end of this sentence to read as follows: "...required in order to deliver energy from the region to the utilities' load centers."	E.3-18

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
19	A.3.1	A-6	4th Paragraph, 4th Sentence	The DEIR/DEIS reads "...widespread system stability..."	The DEIR/DEIS should be corrected to read "...widespread system instability..."	E.3-19
20	A.3.1	A-6	4th Paragraph, 5th Sentence	The DEIR/DEIS incorrectly identifies ownership of the Big Creek hydroelectric generation facilities to belong to PG&E.	The DEIR/DEIS should be corrected to properly identify SCE ownership of the Big Creek hydroelectric generation facilities	E.3-20
21	A.3.1	A-6		The DEIR/DEIS can be read to imply that a no project alternative would work by stating that "despite the fact that the Antelope-Mesa transmission line would overload with the addition of new power, SCE must allow connection of any new wind projects to its system due to its obligations per the Federal Energy Regulatory Commission (FERC) and CAISO."	The DEIR/DEIS should be modified to read as follows: "Because SCE is obligated to allow connection of new wind projects to its system, upgrades must be implemented to mitigate identified overload of the Antelope-Mesa transmission line in order to maintain system reliability as required by the National Electric Reliability Council (NERC) and the Western Electric Coordinating Council (WECC) planning standards as well as the CAISO planning standards." In other words, SCE not only has an obligation to interconnect generation projects, SCE has an overriding obligation to maintain system reliability therefore requiring system upgrades.	E.3-21
22	A.3.1	A-7	Paragraph 1 Sentence 3	The DEIR/DEIS incorrectly states the CAISO is the entity responsible for wind generation development and associated wind generation forecasts.	The DEIR/DEIS should be clarified to properly identify the role of the CAISO as it pertains to wind generation development in Tehachapi. The CAISO does not "estimate" how much total wind energy is to be developed in the area but rather manages the generation interconnection queue. This queue consists of new generation projects proposed by independent power producers placed in priority order based on submittal of a completed interconnection application. As of the date of this DEIR/DEIS there was a total of 2,122 MW of wind generation in the CAISO interconnection queue.	E.3-22

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
23	A.3.1	A-7	Paragraph 2	This paragraph can be read to imply that load growth is triggering the thermal overload of the Antelope-Mesa transmission line. While it is true that load growth is anticipated to trigger thermal overloads in the area, the line that is expected to overload first due to load growth is the Antelope-Vincent. The Antelope-Mesa transmission line overload is triggered with the addition of new wind energy projects located in the Tehachapi and Mojave areas of Kern County delivering energy to the utilities' load centers. The discussion of population growth is therefore immaterial as it pertains to the proposed project.	The DEIR/DEIS should be modified to clearly indicate that the Antelope-Mesa 220 kV T/L would experience thermal overload as a result of interconnecting new RPS wind generation in the area.	E.3-23
24	A.3.1	A-8	Paragraph 3, Line 1	The language in the DEIR/DEIS 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 DEIR/DEIS 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.3-24
25	A.3.1	A-9	Item 2), Line 3 and footnote 4	The DEIR/DEIS incorrectly identifies ownership of the Big Creek hydroelectric generation facilities to belong to PG&E.	The DEIR/DEIS should be corrected to properly identify SCE ownership of the Big Creek hydroelectric generation facilities.	E.3-25
26	A.3.1	A-9	Item 2), 2 <sup>nd</sup> Bullet	See Comment No.24	The DEIR/DEIS 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.3-26

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
27	A.3.3	A-12	Purpose of Action	<p>The discussion of the Forest Service Purpose of Action does 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".</p> <p>An additional priority goal is Goal 4.1b of the National Strategic Plan - "Administer Renewable Energy Resource development while protecting ecosystem health."</p> <p>In addition, the LMP FEIS Volume 2 states "The Forest Service fully supports the National Energy Initiative and would be able to accommodate any proposal based on site specific analysis in any zone other than designated wilderness through the use of adaptive management concepts and the amendment of the revised forest plan. Plan amendment can be accomplished through site specific analysis at the project level." (page 381) The LMP also states that "The key consideration or main factor that affects the management of non-recreation special uses and the designation of sites and corridors is the suitability of land use zones for consideration of these uses." (LMP FEIS Volume 1, page 579)</p>	<p>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).</p> <p>The DEIR/DEIS should be rewritten to more clearly state all of the applicable priority goals for the Goal 4.1b of the National Strategic Plan - "Administer Renewable Energy Resource development while protecting ecosystem health," since the proposed project is being developed to support the RPS goals of the State.</p> <p>Approval of the proposed Project through the ANF will help bring needed renewable energy into southern California.</p> <p>SCE's proposed Project does not traverse any wilderness areas and crosses land use zones that are all considered suitable for consideration of a utility corridor (Developed Area Interface, Back Country and Back Country Motorized Restricted). The DEIR/DEIS should be modified to include the language cited in this comment.</p>

E.3-27

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
28	A.3.3	A-13	Need for Action	<p>The DEIR/DEIS fails to mention the fact that the USFS, per 36 CFR § 219.8(e) (Amendment of LMPs), can amend the LMP to make it consistent with a site-specific action rather than initiating a separate action as discussed in this paragraph.</p> <p>This issue was discussed at a meeting between SCE and the USFS Regional Forester on July 21, 2006, at which the Regional Forester confirmed this is the appropriate process for amending the LMP to facilitate transmission projects through National Forests where the transmission project may be inconsistent with a part of the LMP, such as a Scenic Integrity Objective, rather than the redundant and lengthy process identified in the DEIR/DEIS.</p>	<p>Since the DEIR/DEIS already addresses the alternatives and their potential impacts, any required amendments to the LMP, and the associated impacts, will have already been analyzed in the Project FEIR/FEIS, and therefore the responsible official may rely upon this information to amend the LMP and to authorize the action.</p>

E.3-28

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
29	A.3.3	A-13	USDA Forest Service Purpose and Need Summary	<p>The summary discussion of the Forest Service purpose does 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".</p> <p>An additional priority goal is Goal 4.1b of the National Strategic Plan - "Administer Renewable Energy Resource development while protecting ecosystem health."</p>	<p>This summary 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).</p> <p>The DEIR/DEIS should be rewritten to more clearly state all of the applicable priority goals for the Goal 4.1b of the National Strategic Plan - "Administer Renewable Energy Resource development while protecting ecosystem health," since the proposed project is being developed to support the RPS goals of the State.</p>	E.3-29
30	A.5-1	A-17	2	Dian Grueneich's name is misspelled.	The DEIR/DEIS should be corrected.	E.3-30
31	A.5.2	A-17	Forest Land Management Plan Amendment, Bullets 1 and 2	These bullets discussing respectively, the need to change the Scenic Integrity Objectives and modifying the Forest Standard related to the Pacific Crest Trail, only refer to the need to make these changes for the proposed Project. All the alternatives will also require amendments to the Forest Plan to change the Scenic Integrity Objectives as noted in Table A.5-3 (page 19) and need an amendment to move the otherwise designated utility corridor if the proposed Project is not selected.	Add language to bullets 1 and 2 indicating clearly that these required changes apply not only to the proposed Project, but also all the alternatives.	E.3-31
32	A.5.2	A-19	Table A.5-3	This Table indicates that the implementation of the proposed Project would require changing the SIO rating from High to Very Low for the majority of the route for the proposed project corridor within the National	In its appeal letter provided to the U.S. Forest Service, SCE recommended that the Land Management Plans be modified so that the SIO ratings accurately reflect the present conditions of the view sheds as containing existing SCE	E.3-32

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
				<p>Forest. SCE disagrees that the proposed project corridor should be rated with a High SIO considering that there is an existing power line already within this existing designated utility corridor, as well as several other "human-made" structures including the Bouquet Stone Quarry. SCE also disagrees that the proposed Project would cause the SIO to fall to a Very Low rating.</p> <p>Please see SCE's <i>Notice of Administrative Appeal of the Final Environmental Impact Statement and the 2005 Revised Land Management Plans for the Four Southern California National Forests</i> dated July 20, 2005 for a complete discussion of this issue. This appeal letter is provided as an attachment.</p>	<p>transmission lines - such as the Del Sur- Saugus. Alternatively, the Land Management Plans should include language clarifying that the SIO ratings do not apply to existing rights-of-way (such as the Del Sur-Saugus) so that the SIOs will have no effect on the repermitting or upgrading of existing lines, or the construction of new lines within these same corridors.</p> <p>SCE believes that the SIO rating for the Del Sur-Saugus 66 kV line should be Low, or Moderate at most, rather than High.</p> <p>A letter from the San Bernardino National Forest to the CPUC and BLM, dated August 11, 2006, on the proposed SCE Devers-Palo Verde 500 kV Transmission Project (DPV2), stated that "It is reasonable to manage the easement to a high standard to allow the current activity but maintain high visual standards compatible with the contiguous lands. Until the proposed transmission line upgrade called attention to this parcel, the difference in land status was not known. Since the easement is not part of the wilderness, it is logical to upgrade the SIO map to conform with existing visual management standards where it would have been assigned. This should be a map correction to the SIO map." Therefore, SCE recommends that the DEIR/DEIS should be written in a manner that is consistent with the above comments provided to SCE by the San Bernardino National Forest. This letter from the San Bernardino National forest is provided as an attachment.</p> <p>The Forest Service must ensure that the use and maintenance of existing SCE utility infrastructure is preserved and carried forward in the LMPs, and that SCE will be able to upgrade this infrastructure</p>

E.3-32  
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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
					in order to meet the expanding needs of the communities surrounding the National Forests. Consequently, the Forest Service should modify the LMPs so that the SIO ratings accurately reflect the present conditions of the view sheds as containing existing SCE transmission lines. Alternatively, the LMPs should include language clarifying that the SIO ratings do not apply to existing utility rights-of-way so that the SIOs will have no effect on the re-permitting or upgrading of existing lines or the future addition of new lines within these same utility rights-of-way. Finally, the designated utility corridors should be made wide enough to accommodate additional utilities and address potential resource impacts within the corridor.
33	A.5.3	A-19	Paragraph 1, Line 8	The list of State agencies that would be involved in review and/or permitting authority does not include the Santa Monica Mountains Conservancy (for Alternative 5).	Add the Santa Monica Mountains Conservancy to the list of agencies involved in review and/or permitting authority for Alternative 5.
34	A.5-4	A-20	Table A.5-4		Change "Public Utility Commission" to "Public Utilities Commission".
35	A.5-4	A-21	Table A.5-4		Add City of Los Angeles Department of Water and Power (for an easement to cross over/under DWP power lines) to the list of agencies.

E.3-32  
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E.3-33

E.3-34

E.3-35

**Insert Attachment here**

## Response to Comment Set E.3: Applicant – Introduction

- E.3-1 Thank you. This has been corrected.
- E.3-2 The bullet description has been expanded to indicate that the rating of the Antelope Substation would be increased to 500 kV. A detailed description of the project components is presented in Section B.
- E.3-3 This is meant to explain why this transmission upgrade is needed now rather than later. If it turns out that the PdV Wind Energy Project is delayed or does not move forward for some reason, then the Antelope-Pardee Project would instead provide transmission capacity for whichever wind energy project(s) comes on line first that is able to connect to the Antelope Substation, assuming that project or projects do not generate more than 350 MW.
- E.3-4 We believe the statement in the EIR/EIS is correct, but that the commenter simply chooses to place a different emphasis on the generation need being served by the project. The text has been modified to indicate that the project has been proposed in response to the State of California Renewable Portfolio Standard Program requirements.
- E.3-5 See the response to Comment E.3-3 above. The fact that the PdV Wind Energy Project is under review by Kern County is not relevant.
- E.3-6 The text of the EIR/EIS had been modified to clarify that CAISO did not develop the “estimate” of planned wind energy projects, but that the amount referenced is derived from the interconnection queue managed by the CAISO.
- E.3-7 A portion of the footnote has been deleted based on the information provided in the comment.
- E.3-8 These facilities were considered, but the overall potential for avian electrocution would be reduced. You are commenting on a section summarizing why the alternatives were carried forward for analysis. This section is not intended as an impact summary.
- E.3-9 The visibility of Alternative 2 at selected key observation points (KOPs) is described in Section C.15.7. Again, this section is not intended as an impact summary, but rather summarizes some of the reasons for analyzing this alternative.
- E.3-10 The referenced route change in Haskell Canyon was never formally submitted to either Lead Agency by SCE. Regardless, because of late receipt of this information (the NOP was released in June 2005), the Lead Agencies decided that there was not adequate time to analyze the alternative submitted by SCE in May 2006. At that time, field work, research, and preliminary impact analysis for the EIR/EIS had already been completed.
- E.3-11 The description in Section A.2.2 adequately summarizes Alternative 5. A detailed description of Alternative 5 is presented in Section B.4.5.
- E.3-12 The purpose of this section is not to describe property ownership. There are numerous land parcels that would be traversed by Alternative 5 and it is not necessary to identify individual land owners in the EIR/EIS.

- E.3-13 An alternative is not remote and speculative or infeasible just because it would result in adverse impacts, including adverse impacts to residents. For an alternative to be removed from the analysis, it would need to be demonstrated that it is infeasible as defined by CEQA and NEPA, or demonstrated that it would not accomplish the stated objectives for the project.
- E.3-14 The information cited in the comment is correct, but the point of the comment is not clear. Throughout the Draft EIR/EIS it is stated that Alternative 5 would adversely affect residences outside the ANF. This does not make the alternative infeasible for CEQA and NEPA purposes. Please see the response to Comment E.3-13 above.
- E.3-15 Please see the response to Comment E.1-11.
- E.3-16 This information has been added to Table A.5.4.
- E.3-17 The Lead Agencies considered an approach similar to the one suggested, but decided to present the purpose and need as presented in the Draft EIR/EIS. There is precedent for presenting the purpose and need statements separately in NEPA documents. Furthermore, Forest Service direction on the proposed action is to respond to the following questions: who, what, when and where?; the purpose and need is to answer the question “why are we (the Forest Service) considering this proposed action”. For special use applications, the standard need is to respond to a special use application. Under NEPA this is a federal action; not a SCE action. The Forest Service purpose and need is for the agency action (deny the application or issue an authorization as proposed or modified).
- E.3-18 The wording in the Final EIR/EIS has been modified to indicate that the energy would be delivered to SCE’s load centers.
- E.3-19 The sentence in the Draft EIR/EIS seems to make sense as presented (i.e., “instability” is a system stability issue), but the suggested wording modification has been included in the Final EIR/EIS.
- E.3-20 Thank you. This has been corrected.
- E.3-21 Thank you for the suggested wording. The text in the Final EIR/EIS has been modified.
- E.3-22 The text in the Final EIR/EIS has been modified to indicate that a total of 2,122 MW was in the CAISO interconnection queue at the time the Draft EIR/EIS was prepared.
- E.3-23 The sentence has been changed to remove the reference to population growth.
- E.3-24 It is not important in this description to indicate what SCE did or did not consider.
- E.3-25 Thank you. This has been corrected.
- E.3-26 Please see the response to Comment E.3-24 above.
- E.3-27 Note that Section A.3.3 (on page A-12) of the Draft EIR/EIS does acknowledge that one of the Forest Service’s purposes (objectives) in authorizing the proposed Project is to ensure that the location of the transmission line on NFS lands maximizes the accommodation of future utility needs (Forest Plan, Part 2, p. 121; Part 3, p. 59). The commenter is referred to Section A.5.2 (USDA Forest Service) wherein the Forest Service activities necessary for proposed Project approval are discussed in detail, including the Forest Land Management Plan amendments required that ensure proposed Project compliance with Forest Service purpose and objectives. The Land Management Plan consists of the policies intended to address the goals of the National Strategic Plan. In fact, the

National Strategic Plan is included as Appendix A of the Land Management Plan. As stated in the 2005 Land Management Plan, Part 1, Southern California National Forests Vision (page 2), the Forest Service's updated (2003) draft version of the Strategic Plan for the agency includes the long-term goals and objectives to help guide the Forest Service's current actions and future plans. Therefore, the discussion of the necessary Land Management Plan amendments for the Project provided in Section A of the Draft EIR/EIS is sufficient. The reader is also referred to Section C.9 (Land Use and Recreation) for a discussion of utility corridors as they relate to necessary Forest Plan amendments.

- E.3-28 The amendments needed to approve the proposed Project or an alternative would be project-specific and this is what intended in the description in the Draft EIR/EIS. No amendments are intended as separate actions nor are they described as such. The Draft EIR/EIS contains the NEPA analysis for any required Forest Plan amendments, unless changes to the Project are introduced that would alter the nature of the required amendments.
- E.3-29 See the response to Comment E.3-27.
- E.3-30 Thank you. This has been corrected.
- E.3-31 The introductory text already preceding the bullets clearly indicates that these are the types of amendments that would be required for the proposed Project and alternatives. These bullets list the types of amendments required for the proposed Project and alternatives collectively, rather than specifically indicating what amendments are applicable to the Project or specific alternatives.
- E.3-32 As stated in Section C.15.1.1 of the Draft EIR/EIS, the purpose of Scenic Integrity Objectives is "to define the degrees of deviation from the natural landscape character that may occur at any given time..." "SIOs represent the minimum levels of scenic integrity to which landscapes are to be managed." The Forest Service has designated the area occupied by the existing 66-kV transmission line as High SIO, regardless of the existing scenic integrity ("present conditions of viewsheds") that are created by the existing 66-kV transmission line. Existing scenic integrity and scenic integrity objectives (desired future condition with minimum levels of scenic integrity) are completely separate issues. SCE's assertion that the Forest Service should modify the LMPs so that the SIO ratings accurately reflect the present conditions of the viewsheds misses the point of Scenic Integrity Objectives. Combined with Desired Landscape Character that establishes "Maximum Desired Conditions," Scenic Integrity Objectives establish minimum levels of management for scenic resources. Existing scenic integrity caused by existing infrastructure in the landscape does not meet the desired condition of either Desired Landscape Character or Scenic Integrity Objectives.

SCE's assertion that the SIO ratings do not apply to existing rights-of-way (such as the Del Sur-Saugus) is not substantiated by the Forest Management Plan or the SIO maps. Management direction given in the Forest Plan indicates that the High SIO areas *WILL* have an effect on re-permitting or upgrading of existing lines, or the construction of new lines within these same corridors, and therefore, Forest Plan Amendments described in Section A.5.2 (USDA Forest Service) of the Draft EIR/EIS are required for implementation of the proposed Project.

SCE's request that "the SIO rating for the Del Sur-Saugus 66-kV line should be Low, or Moderate at most, rather than High" SIO would be more restrictive than the Plan Amendment to Very Low SIO, which is recommended in Table A.5-3 of the Draft EIR/EIS. SCE's request to raise the SIO seems counter-intuitive from a visual resource standpoint, as SCE's request would cause more

restrictions than the Very Low SIO that is recommended in the Draft EIR/EIS Table A.5-3. Furthermore, the Forest Plan appeal is outside the scope of the EIR/EIS analysis. Should the Forest Plan appeal decision agree with SCE and the decision is rendered prior to the issuance of the Final EIR/EIS, the new information will be added. Presently, we must follow the existing Forest Plan with the designated SIOs.

The letter from the San Bernardino National Forest (SBNF) regarding a SIO-map correction for the proposed SCE Devers-Palo Verde 500kV Transmission Project is completely irrelevant to the existing Del Sur-Saugus 66-kV line. First, the SBNF does not manage the Angeles National Forest. Second, the addition of a second 500-kV line (i.e., the Devers-Valley No. 2 Alternative) adjacent to an existing 500-kV line (i.e., Devers-Valley No. 1) has completely different visual effects than the removal of the existing weathered structures of the Del Sur-Saugus 66-kV line and construction of a new 500-kV Antelope-Pardee line in a widened ROW, and those visual effects are adequately described in Section C.15.5. Third, the length of DPV2 across SBNF is approximately 1.8 miles, while the length of the proposed Antelope-Pardee Project inside National Forest boundaries of the Angeles NF is approximately 12.9 miles, of which, approximately 12.6 miles are NFS lands. This increased length creates a different magnitude of visual change on the ANF. Fourth, the ROW granted in 1985 for the Devers Project was 330 feet wide, while the existing ROW for the Del Sur-Saugus 66-kV line is only 100 feet wide, with a request from SCE to widen the ROW to 160 feet as shown in Figures B.2-2b through B.2-2d.

E.3-33 This information has been added to Table A.5.4.

E.3-34 Thank you. This has been corrected.

E.3-35 This information has been added to Table A.5.4.