

Comment Set B.9: Acton Agua Dulce Trails Council



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BY:.....

September 18, 2006

Aspen Environmental Group
30423 Canwood St., Ste 215
Agoua Hills, CA 91301

Subject: **Antelope-Pardee Transmission line Alternative 5**

Dear Sir/Madam:

The Acton/Aqua Dulce Trails Council (the "Council") was formed in 1989 for the expressed purpose of developing, supporting and maintaining multi-purpose trails in the area. The Council actively works to enhance the rural, equestrian lifestyle in our area and is, along with the Santa Clarita Valley Trails Council ("SCVTC"), considered by Los Angeles County as an Advising Agency for such matters.

We are therefore extremely puzzled by the fact that no one associated with the Draft EIR/EIS for the above project has contacted this or any of the other Equestrian Advising Agencies in the County. We received no notice, were afforded no opportunity as was the Forest Service or even SunCal (a large Residential Developer impacted by Segments 2 and 3) to comment prior to the role out of this assessment.

B.9-1

This Alternative, as presented runs across some of California most significant historic trails, including the Pacific Crest Trail. Further there has been a 10-year effort to identify, map and work with Los Angeles County for the permanent, and protected public access to unspoiled nature trails. Alternatives 4 and 5, as presented decimates this effort.

B.9-2

It is with concern and some experience with these issues that we strongly oppose this project in its present form. Above and beyond the issue of trails is the potential destruction of ranches and property long held in family trust. The concept of "Fair Market" pricing does not even come close to adequately compensating families for the true replacement costs of these properties, should this project move forward. As you must surely know, when a property is assessed at "Fair Market" all existing "improvements" are valued at a mere fraction of their actual replacement cost. Asking people that have invested their live who are located in this area to accept pennies on the dollar for their facility is way out of line!

B.9-3

We are therefore most concerned with the proposed loss of equestrian properties and resulting negative impact on its lifestyle. The proposed project will cause the loss of hundreds of equestrian properties in one of Los Angeles Counties last Equestrian Communities. We believe that this Alternative is totally inconsistent with the existing area, local zoning, the Santa Clarita General and Specific Plans, as well as being out of character for this area.

B.9-4

As regards the above nowhere in the draft EIS/EIR is reference made to the socio-economic impacts resulting form the displacement of small ranch owners, who, as stated above, will not be compensated sufficiently to replace even a portion of their facilities by "Fair Market" pricing.

B.9-5

Beside the many other issues involved with this Alternative 5, the film industry would be lost. The industry would be forced to find alternative places to film, putting an economic impact on this community.

B.9-6

No study was done on fighting fires caused by these power lines. There are no fire hydrants in the area and the homes are on wells. When the wells run out the fire department has no source of water, which would result in loss of homes. Everyone knows these lines have failed many times and started fires. | B.9-7

Additionally we are puzzled at the apparent violation of NEPA and CEQA regarding Cumulative Impacts. The above project is but a mere part of a larger transmission and generation activity by many players. Review of the underlying documents for this project and the generation facilities in Tehachapi fails to reveal any addressing of the concept of Cumulative Impacts. How can this be? Federal and State law requires such an assessment for multiple, integrated projects such as this one represents. The CPUC website refers to a total of 12 segments for the ultimate build out of this transmission. Where is the reference to this in the current document? Where is the Cumulative Impacts Analysis mandated by law? | B.9-8

The solution to this situation is to revert to the initial Forest Utility Corridor that does not cause the socio-economic disruption of hundreds of families. This is the only win-win option for this transmission project. | B.9-9

We look forward to being formally contacted on the balance of the 12 segments referred to in PUC documents so that we can participate in a pro-active manner and not in the last minute basis.

Respectfully submitted,


Al Huber
President
Acton/Agua Dulce Trails Council

cc: Mayor Michael D. Antonovich 5th District Supervisor
State Senator George Runner
State Assemblyman Keith Richman
State Assemblywoman Audra Strickland
State Assemblywoman Sharon Runner
Governor Schwarzenegger –Appoints CPUC Commission
Aspen Environmental Group
Marian Kadota, USFS, EIS Project Manager
John Boccio CPUC,EIR Project Manager
Acton Town Council
Agua Dulce Town Council

Response to Comment Set B.9: Acton Agua Dulce Trails Council

- B.9-1 Please see General Response GR-5 regarding noticing procedures.
- B.9-2 Impacts to recreational trails are discussed in the Draft EIR/EIS both in Section C.9, Land Use and Public Recreation, and Section C.15, Visual Resources.
- B.9-3 Thank you for submitting your opinion on Alternative 5. Please see General Response GR-2 regarding property acquisition.
- B.9-4 Thank you for submitting your comments regarding Alternative 5. Consistency with local plans and policies are discussed in detail in Section C.9, Land Use and Public Recreation. As shown in Table C.9-4 and discussed in Section C.9.10.2, Alternative 5 would not conflict with Los Angeles County, City of Lancaster, or City of Santa Clarita land use plans and policies. Alternative 5 would require easements across several properties and require temporary preclusion of trails during construction activities for safety; however, these actions would not result in the loss of hundreds of equestrian properties as the commenter claims.
- B.9-5 Socioeconomic impacts associated with Alternative 5 are discussed in Section C.12.10 of the Draft EIR/EIS. The removal of existing housing, such as ranches, was determined to be a significant impact (Class I). Please see General Response GR-2 regarding property acquisition.
- B.9-6 As discussed in Draft EIR/EIS Section C.15.10.2, impacts to views from Vasquez Rocks as a result of Alternative 5 would be significant and unavoidable (Class I). While this visual impact was found to be significant and unavoidable, economic impacts related to the filming at the Vasquez Rocks Natural Area Park are unlike the Veluzat Motion Picture Ranch, which is a land use specifically designated for filming activities only. The Vasquez Rocks Natural Area Park is not a specific filming location, and has a primary purpose of being a public recreational use area. Furthermore, due to the proposed linear route of Alternative 5, and the size and topography of the Vasquez Rocks Natural Area Park, it is believed that locations would continue to be available within the Park that would provide similar background views for filming without views of the transmission line and towers impeding filming activities.

While it is possible that filming could be adversely affected in some locations in Agua Dulce due to the visual prominence of transmission line and towers, it is not possible to quantify any economic effect associated with loss of filming opportunities that might result from implementation from Alternative 5 resulting in a socioeconomic impact. In fact, it is difficult to determine with any certainty whether the amount of filming conducted in the Agua Dulce area would decline in the future and whether such a possible decline would be the result of Alternative 5. Only a portion of the area would be affected by Alternative 5 and it is doubtful that all the locations in the Agua Dulce area would no longer receive use as filming locations because of Alternative 5. However, the Lead Agencies concede that it is possible that filming could be adversely affected in some locations in Agua Dulce due to the visual prominence of transmission line and towers. It should be noted, however, that the potential to impact filming activities in Agua Dulce are unlike the Veluzat Motion Picture Ranch, as this is a private property operated specifically as a filming location.

The Draft EIR/EIS Section C.15.10.2 concludes that the visual impacts of Alternative 5 are significant and unavoidable (Class I). For instance, Impacts V-24, V-25, and V-26 indicate that the visual

impacts from Alternative 5 at Key Observation Points in the Agua Dulce area would be significant and unavoidable. While the socioeconomic impacts to the filming industry cannot be reliably estimated, your concerns regarding this issue will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.

- B.9-7 The Draft EIR/EIS acknowledges the constraints that transmission lines can impose on aggressive fire fighting, especially aerial fire suppression. A discussion of the limitations on fire fighting in the vicinity of transmission lines is presented in Section C.7.5 of the Draft EIR/EIS. Please note that all rules and regulations regarding the construction, operation, and maintenance of transmission lines will be adhered to by SCE. Please see the response to Comment B.13-5.
- B.9-8 The EIR/EIS preparers understand that the proposed Project is part of the conceptual transmission plan recommended by the Tehachapi Collaborative Study Group (TCSG), which is called the Tehachapi Transmission Project (TTP). As discussed in Draft EIR/EIS Section A.4.2, the TTP would be implemented in four separate phases, and include upgrades to both the SCE system and the PG&E system, as Tehachapi-area wind projects proceed to develop and connect to the existing SCE transmission system. The Antelope Transmission Project is only one part of Phase 1 of the TTP.

Per CEQA Guidelines section 15130(b), the discussion of cumulative impacts begins by preparing “(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified”. A list of cumulative projects is provided in Section B.5, Cumulative Impacts Scenario, of the Draft EIR/EIS, which includes Segment 2 and Segment 3 of the Antelope Transmission Project, which are the only other transmission projects in the vicinity for which any specific information exists. The other “segments” of the overall transmission plan developed by the Tehachapi Collaborative Study Group and the alternative transmission plan recently proposed by the California Independent System Operator are only conceptual and, therefore, not reasonably foreseeable to include in the cumulative impact analysis at this time. No specific route alignments have been identified for these possible future transmission projects and no project details are available that would allow any meaningful analysis of potential impacts. As such, inclusion of these projects as part of the cumulative analysis would not change the analysis.

- B.9-9 Thank you for submitting your comments on the Project. They will be shared with the decision-makers who are reviewing the Project and the alternatives at the USDA Forest Service and the CPUC.