

Comment Set A.12: Santa Monica Mountains Conservancy

STATE OF CALIFORNIA—THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

SANTA MONICA MOUNTAINS CONSERVANCY

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October 3, 2006

John Boccio, CPUC, EIR Project Manager
Marian Kadota, USDA Forest Service, EIS Project Manager
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California 91301

Notice of Preparation of EIR/EIS Comments for the Antelope-Pardee 500-kV Transmission Project

Dear Mr. Boccio and Ms. Kadota:

The proposed 25.6-mile-long 500-kV transmission line crossing through the Angeles National Forest (ANF) between the existing Antelope and Pardee substations will result in many unavoidable significant adverse ecological effects on both public and private lands. The minimum new power corridor footprint within ANF would be 43.5 acres, of which 21.4 acres is estimated for some level of restoration. Additional mitigation is necessary to partially offset these impacts. The ecological capacity of ANF is vital to the integrity of the Santa Monica Mountains and Rim of the Valley Trail Corridor areas. Additionally, over 50 square miles of the ANF boundary overlap the Santa Monica Mountains range.

The proposed project route through ANF seems unavoidable politically. However, of the five alternatives we are in favor of Alternative 4. Alternative 4 will have less of an ecological impact on oak riparian habitat than the proposed project route between mile 17.5 and mile 20.3. In such case, the best mitigation opportunities are located on non-ANF lands, particularly the areas between the northeast ANF boundary and Antelope Substation (mile 0 to mile 5.7), and between the southwest ANF boundary and Pardee Substation (mile 18.6 to mile 25.6). Expansion of the right-of-way (ROW) from 50 feet to 180 feet and the establishment of a new 2.8-mile ROW within these areas, will require the acquisition of public and/or private lands both in fee and in easements. The proposed Antelope substation modification alone will require 33 acres of adjacent lands that would affect at least five different private parcels. Instead of purchasing a portion of each affecting property, which may affect the residual value, it might be more beneficial to purchase the

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A.12-2

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entire parcel. The unused remainder portions of any parcels purchased should remain as permanent public open space, or in some areas, conservation easement-protected lands. Instead of purchasing a portion of one of the affected parcels, we suggest Southern California Edison (SCE) purchase entire parcels as a major mitigation program.

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In addition, the abandoned SCE easement or private land should be covered by a conservation easement for wildlife corridor and open space purposes. Such uses are not incompatible with the future use of these easements for new utility projects. If the easements were to revert to a condition where they can be privately developed, the impacts of that potential habitat loss and severance of connectivity must be addressed in the EIR/EIS.

The benefits of such an easement would be invaluable for surrounding ecosystems. The surrounding areas contiguous with the transmission lines would create a 'wildlife corridor' between ANF and areas surrounding each substation. A new utility corridor provides the opportunity for a contiguous north-south wildlife habitat linkage from the ANF to high quality habitat areas north of the California Aqueduct. This opportunity probably will not arise again. The greater breadth added to that corridor by remainder parcels significantly increases corridor capacity.

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To guarantee the long term habitat value of these mitigation lands, they must be protected under public ownership. Better protection is provided by fee simple ownership; conservation easements are also effective. Both the Mountains Recreation and Conservation Authority (MRCA), and the newly formed Joint Powers Authority between the Santa Monica Mountains Conservancy (SMMC), and the Antelope Valley Resource Conservation District, known as the Desert and Mountains Conservation Authority (DMCA), would willingly take title to these portions of parcels and /or easements. Both agencies are exempt from the Subdivision Map Act and thus fragmented parcels are no problem to accept. Any property desired by the ANF could then be transferred on a time table dictated by the federal government. The maintenance of these areas would be at no additional cost to the public. Additionally, the easements will not prevent any future maintenance or repairs of the transmission line and facilities.

Compensation Needed For Utility Easements Across Federal Land

We believe SCE needs to acquire additional ROW's from the National Forest Service (NFS). How will the federal government be compensated for the loss of land converted to new and

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recommend that full fair market value of the property be paid into a fund given to and administrated by ANF. If it is more advantageous for SCE to set up a habitat conservation fund along a corridor, both MRCA and DMCA would be able to conduct such programs. Monies generated from each end, from the Antelope Substation to the northwest ANF boundary, and the southeast ANF boundary to the Pardee Substation, would fund each area respectively.

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A.12-5

Please direct any correspondence and questions to me at the above address and by phone at (310) 589-3200, ext. 128.

Sincerely,



Paul Edelman
Deputy Director
Natural Resources and Planning

Response to Comment Set A.12: Santa Monica Mountains Conservancy

- A.12-1 Thank you for submitting your opinion regarding Alternative 4. Your comment will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- A.12-2 Thank you for submitting your recommendations. Your comment will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.
- Please see General Response GR-2 regarding property acquisition. Regulations are in place to determine when an entire parcel must be purchased versus only a portion impacted.
- A.12-3 Thank you for submitting your recommendations. Your comment will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC. It is recommended that the Santa Monica Mountains Conservancy discuss their ideas directly with SCE.
- A.12-4 Please see General Response GR-2 regarding property acquisition.
- A.12-5 It is recommended that the Santa Monica Mountains Conservancy discuss their ideas directly with SCE.