

Comment Set E.19: Applicant – Comparison of Alternatives

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
D. COMPARISON OF ALTERNATIVES**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
1	D.2.1	D-1	D.2.1 - Proposed Project	The DEIR/DEIS incorrectly states that the new T/L is being built "to serve Southern California residents and businesses."	SCE suggests modifying the sentence to read as follows: "The proposed Project would provide transmission capacity for wind energy resources that are expected to develop in Kern and northern Los Angeles Counties in response to the State of California Renewable Portfolio Standard target goals."	E.19-1
2	D.2.1	D-1	Table D.2.1 - Features of the Proposed Project	The table incorrectly lists the estimated duration of construction as 13 months. SCE's PEA shows that the estimate of proposed construction is 18 months for the subtransmission and transmission work.	Revise the estimate of proposed construction to reflect 18 months as provided for in SCE's PEA.	E.19-2
3	D.2.3	D-3	Table D.2-3; Features of Alternative 2	The table list the estimated duration of construction as 14 months without providing the assumptions of how this duration is calculated. The length of this alternative is 1.2 miles longer than the Proposed Project and yet takes 2 months less to complete when compared to the 18 months estimated by SCE for its Proposed Project in the PEA.	Provide assumptions for the duration of construction for Alternative 2.	E.19-3
4	D.2.4	D-3	Table D.2-4; Features of Alternative 3	The table list the estimated duration of construction as 13 months without providing the assumptions of how this duration is calculated.	Provide assumptions for the duration of construction for Alternative 3.	E.19-4
5	D.2.5	D-4	Table D.2-4; Features of Alternative 4	The table list the estimated duration of construction as 13 months without providing the assumptions of how this duration is calculated.	Provide assumptions for the duration of construction for Alternative 4.	E.19-5

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6	D.2.6	D-4	D.2.6 - Alternative 5	The summary of Alternative 5 does not adequately list the communities and lands managed by various agencies	In addition to the community of Leona Valley, the DEIR/DEIS summary of Alternative 5 should list the following communities and agency managed lands: Aqua Dulce; Acton; Los Angeles County; Santa Monica Mountains Conservancy; Vasquez Rocks; Bureau of Land Management; and other unincorporated communities of Los Angeles County
7	D.2.6	D-7	Table D.2-6; Features of Alternative 5	<p>The table list the estimated duration of construction as 16 months without providing the assumptions of how this duration is calculated.</p> <p>Alternative 5 is 37.2 miles long as compared to the proposed project's length of 25.6 miles for an approximate increase in length of 11.6 miles or a 45.3% increase in length. A simple ratio of length versus duration of construction (using SCE's estimate of 18 months for the Proposed Project) would suggest that the estimated duration of construction for Alternative 5 should be 26 months versus the 16 months listed.</p> <p>This additional 10 months of construction could have impacts which may not have been addressed in the DEIR/DEIS and subsequently not presented in the comparison of alternatives</p>	Provide assumptions for the duration of construction for Alternative 5.

E.19-6

E.19-7

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8	D.3	D-7 thru D-11	Table D.3-1 Summary Comparison of Environmental Issues/Impacts	Table D.3-1 does not list a column combining Alternative 2 and Alternative 4 and listing the combined impacts of this proposed CEQA Environmentally Superior Alternative for analysis or comparison against the Proposed Project and other alternatives.	Revise Table D.3-1 to show a column combining Alternative 2 and Alternative 4 listing the impacts specific to these two alternatives without the Proposed Project component. Revise Section D to include analysis, discussion and comparison of the Alternative 2/Alternative 4 combination against the Proposed Project and other alternatives based on the impacts listed in the Revised Table D.3-1.	E.19-8
9	D.3	D-7 thru D-11	Table D.3-1 Summary Comparison of Environmental Issues/Impacts		For each environmental issue area and impact listed, refer to SCE's comments to the respective environmental issue area in Section C - Environmental Analysis.	E.19-9
10	D.4.1	D-6	D.4.1 - Air Quality; last paragraph on page D.6	The DEIR/DEIS, with reference to Table D.4-1, states "For air quality, this ranking system might lead to the incorrect conclusion that Alternative 5 could be the preferred alternative." Table D.4-1 lists identical impacts for the Proposed Project; Alt.2; Alt. 3; Alt. 4; and Alt.5 which would lead the reader to conclude that these 5 alternatives have equal impact. It certainly would not imply that Alternative 5 would have fewer impacts.	Delete the following sentence "For air quality, this ranking system might lead to the incorrect conclusion that Alternative 5 could be the preferred alternative."	E.19-10
11	D.4.2	D-14	D.4.2 - Biological Resources		Refer to comments in Section C.3	E.19-11
12	D.4.3	D-16	D.4.3- Cultural Resources		Refer to comments in Section C.4	E.19-12
13	D.4.4	D-17	D.4.4- Geology, Soils and Paleontology		Refer to comments in Section C.5	E.19-13

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14	D.4.5	D-18	D.4.5- Public Health and Safety		Refer to comments in Section C.6	E.19-14
15	D.4.6	D-19	D.4.6- Forest Management Activities		Refer to comments in Section C.7	E.19-15
16	D.4.7	D-21	D.4.7- Hydrology and water Quality		Refer to comments in Section C.8	E.19-16
17	D.4.8	D-23	D.4.8 - Land Use and Public Recreation		Refer to comments in Section C.9	E.19-17
18	D.4.9	D-25	D.4.9 - Noise		Refer to comments in Section C.10	E.19-18
19	D.4.10	D-28	D.4.23- Public Services		Refer to comments in Section C.11	E.19-19
20	D.4.11	D-29	D.4.11 - Socioeconomics		Refer to comments in Section C.12	E.19-20

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
21	D.4.11	D-29	D.4.11 - Socioeconomics	<p>Although this is not an environmental impact under CEQA or NEPA, the DEIR/DEIS incorrectly concludes that "operation of the proposed Project and alternatives (except for Alternative 4) would result in significant and unavoidable impacts (Class I) related to socioeconomics."</p> <p>The DEIR/DEIS fails to discuss the impacts of Alternative 4 to the Blue Cloud Motion Picture Ranch and the McMillin residential tract development. This lack of discussion leads to the incorrect conclusion that Alternative 4 would result in no significant and unavoidable impacts.</p>	<p>The DEIR/DEIS should provide discussion of the impacts of Alternative 4 on the Blue Cloud Motion Picture Ranch and the McMillin residential tract development.</p>
22	D.4.11	D-29	D.4.11 - Socioeconomics	<p>Please note that SCE worked with potentially affected property owners in Haskell Canyon on a proposed reroute that was provided to consultants and not incorporated into the DEIR/DEIS.</p>	<p>The DEIR/DEIS should provide discussion of the socioeconomic impacts of the SCE proposed re-route of the Proposed Project to the west of Haskell Canyon and the McMillin residential tract development.</p>

E.19-21

E.19-22

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
23	D.4.11	D-29	D.4.11 - Socioeconomics	<p>The DEIR/DEIS states "Alternative 5 would traverse or be sited adjacent to several residences along Anthony Road and Hierba Road north of Sierra Highway, and would therefore possibly result in significant unavoidable socioeconomic impacts (Class I) (Impact S-7) as a result of removing residential structures to accommodate the new ROW."</p> <p>Although this is not an environmental impact under CEQA or NEPA (see Comments provided for Socioeconomics Section C.12), the DEIR/DEIS fails to adequately quantify and analyze the socioeconomic impact of the acquisition of private homes along the Alternative 5 route to the homeowners and the resulting impact of their relocation on their communities and local businesses.</p> <p>Although this is not an environmental impact under CEQA or NEPA (see Comments provided for Socioeconomics Section C.12), the DEIR/DEIS fails to adequately analyze the socioeconomic impact of the construction and operation of Alternative 5 to the homeowners and local businesses along the Alternative 5 route.</p> <p>The DEIR/DEIS incorrectly concludes that Alternative 5 would <u>only</u> "possibly result in significant unavoidable socioeconomic impacts".</p>	<p>Provide adequate and appropriate discussion of the socioeconomic impacts associated with Alternative 5 on the communities it traverses and will impact.</p>

E.19-23

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
24	D.4.11	D-30	D.4.11 - Socioeconomics 2nd Bullet - Alternative 5	<p>This bullet does not include reference to the impact that Alternative 5 would have on the homeowners and local businesses along the Alternative 5 route.</p> <p>This bullet incorrectly implies that the socioeconomic impact to the homeowners and communities along Alternative 5 is less than the impact to the Veluzat Motion Picture Ranch and the Bouquet Canyon Stone Quarry.</p>	<p>Include reference to the impact that Alternative 5 would have to homeowners and local businesses along the Alternative 5 route.</p> <p>Correctly compare and present the relative impacts to the homeowners and businesses along Alternative 5 to the impacts of the Proposed Project on the Veluzat Motion Picture Ranch and the Bouquet Canyon Stone Quarry.</p>	E.19-24
25	D.4.11	D-30	D.4.11 - Socioeconomics 1st Bullet - Alternative 4	This bullet does not include reference to the impact that Alternative 4 would have on the Blue Cloud Motion Picture Ranch and the McMillin residential tract development.	Include analysis and discussion of the impact that Alternative 4 would have on the Blue Cloud Motion Picture Ranch and the McMillin residential tract development.	E.19-25
26	D.4.11	D-30	D.4.11 - Socioeconomics 3rd Bullet - Proposed Project and Alternative 2 & 3	Please note that SCE worked with potentially affected property owners in Haskell Canyon on a proposed reroute that was provided to consultants and not incorporated into the DEIR/DEIS.		E.19-26
27	D.4.12	D-31	D.4.11 - Traffic and Transportation		Refer to comments in Section C.13	E.19-27
28	D.4.13	D-32	D.4.11 - Utilities and Service Systems		Refer to comments in Section C.14	E.19-28
29	D.4.14	D-14	D.4.11 - Visual Resources		Refer to comments in Section C.15 and in Global Comments	E.19-29
30	D.5 - CEQA Environmentally Superior Alternative	D-36 - D-39		The DEIR/DEIS fails to adequately discuss and analyze the impacts and benefits of a reroute SCE proposed that routes the Proposed Project to the west side of Haskell Canyon thus avoiding the Veluzat and Blue Cloud Motion Picture Ranches and minimizes impacts to the McMillin development.	Include analysis and description of the SCE proposed reroute.	E.19-30

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31	D.5 - CEQA Environmentally Superior Alternative	D-36 - D-39		The DEIR/DEIS fails to discuss the impacts of Alternative 4 to the Blue Cloud Motion Picture Ranch and the McMillin residential tract development. This lack of discussion leads to the incorrect conclusion that Alternative 4 would result in no significant and unavoidable impacts.	Provide analysis and discussion of the impacts of Alternative 4 on the Blue Cloud Motion Picture Ranch and the McMillin residential tract development.	E.19-31
32	D.5 - CEQA Environmentally Superior Alternative	D-36 - D-39		The DEIR/DEIS fails to discuss the impact on visual resources as a result of Alternative 2 being closer to Bouquet Canyon Road, appearing larger in scale and the increased impact to residents and motorists along Bouquet Canyon Road.	Correctly select Key Observation Points for Alternative 2 and analyze the impact on visual resources for this mid-slope alternative.	E.19-32
33	D.5 - CEQA Environmentally Superior Alternative	D-36 - D-39		The DEIR/DEIS states" Effects on visual resources are also important considerations on non-NFS lands, but these effects are considered more significant on NFS lands due to the Scenic Integrity Objectives of the 2005 ANF Forest Management Plan (Forest Plan)." The DEIR/DEIS incorrectly places the Scenic Integrity Objectives of the Angeles National Forest as a higher priority than the visual objectives of residents, communities and motorists along the route for Alternative 5.	Provide an analysis and discussion of the visual impacts of Alternative 5 on the residents and communities along the Alternative 5 route. Provide a balanced comparison of the visual impacts of Alternative 5 to the Proposed Project.	E.19-33

Response to Comment Set E.19: Applicant – Comparison of Alternatives

- E.19-1 The wording modification has been included in the Final EIR/EIS.
- E.19-2 Please see the response to Comment E.4-3 regarding the 13-month construction schedule.
- E.19-3 The estimated duration of construction for Alternative 2 is one month longer (14 months) than the proposed Project (response to Comment E.19-2) reflecting the longer length of this alternative alignment.
- E.19-4 The estimated duration of construction for Alternative 3 is the same as the proposed Project (response to Comment E.19-2), as the construction requirements are very similar in nature.
- E.19-5 The estimated duration of construction for Alternative 4 is the same as the proposed Project (response to Comment E.19-2), as the construction requirements are very similar in nature.
- E.19-6 The description of Alternative 5 provided in Section D is for summary purposes only. The communities and lands traversed by Alternative 5 are discussed in detail in Section C.9.10, Land Use and Public Recreation.
- E.19-7 The estimated duration of construction for Alternative 5 is three month longer (16 months) than the proposed Project (response to Comment E.19-2) reflecting the longer length of this alternative alignment.
- E.19-8 The impacts of each alternative are described and compared in Table D.3-1, including the impacts of Alternatives 2 and 4, which is considered sufficient, especially when considering that the differences between these two alternatives do not overlap and are therefore independent (as are the analyses).
- E.19-9 Table D.3-1 has been updated in the Final EIR/EIS to reflect edits to issue area analyses.
- E.19-10 This sentence has been deleted from the Final EIR/EIS.
- E.19-11 Section D.4.2, Biological Resources, has been updated as necessary to reflect responses to comments made on Section C.3.
- E.19-12 No updates to Section D.4.3, Cultural Resources, were warranted based on the responses to comments made on Section C.5.
- E.19-13 Section D.4.4, Geology, Soils, and Paleontology, has been updated as necessary to reflect responses to comments made on Section C.5.
- E.19-14 No changes to Section D.4.5, Public Health and Safety, were warranted based on the responses to comments made on Section C.6.
- E.19-15 Section D.4.6, Forest Management Activities, has been updated as necessary to reflect responses to comments made on Section C.7.
- E.19-16 No changes to Section D.4.7, Hydrology and Water Quality, were warranted based on the responses to comments made on Section C.8.

- E.19-17 Section D.4.8, Land Use and Public Recreation, has been updated as necessary to reflect responses to comments made on Section C.9.
- E.19-18 No changes to Section D.4.9, Noise, were warranted based on the responses to comments made on Section C.10.
- E.19-19 Section D.4.10, Public Services, has been updated as necessary to reflect responses to comments made on Section C.11.
- E.19-20 No changes to Section D.4.11, Socioeconomics, were warranted based on the responses to comments made on Section C.12.
- E.19-21 See the response to Comment E.15-4 regarding impacts of Alternative 4 on the McMillin development and the Blue Cloud Movie Ranch. No changes to Section D.4.11, Socioeconomics, were warranted based on the responses to comments made on Section C.12.
- E.19-22 See the response to Comment E.3-10 regarding the SCE proposed re-route.
- E.19-23 As discussed in Draft EIR/EIS Section C.12.10.2, while it is possible that residences within the Alternative 5 corridor would be purchased and removed by SCE, it is speculative that these residences would relocate outside the Leona Valley community, thus potentially impacting the existing community or economic base. Without specific tower locations and route plan, it is not possible at this time to quantify the number of residences impacted by the Alternative 5 route. Therefore, the determination of "possibly resulting in significant unavoidable impacts" is considered an adequate conclusion.
- E.19-24 Please see the response to Comment E.19-23. Furthermore, as discussed in Draft EIR/EIS Section C.12, Socioeconomics, significant unavoidable impacts would occur to displaced residents as a result of Alternative 5, as well as to the Veluzat Motion Picture Ranch as a result of proposed Project. Impacts would be less than significant with mitigation incorporated to the Bouquet Canyon Stone Quarry.
- E.19-25 See the response to Comment E.15-4 regarding impacts of Alternative 4 on the McMillin development and the Blue Cloud Movie Ranch. No changes to Section D.4.11, Socioeconomics, were warranted based on the responses to comments made on Section C.12.
- E.19-26 See the response to Comment E.3-10 regarding the SCE proposed re-route.
- E.19-27 Section D.4.12, Traffic and Transportation, has been updated as necessary to reflect responses to comments made on Section C.13.
- E.19-28 No changes to Section D.4.13, Utilities and Service Systems, were warranted based on the responses to comments made on Section C.14.
- E.19-29 Section D.4.14, Visual Resources, has been updated as necessary to reflect responses to comments made on Section C.15.
- E.19-30 See the response to Comment E.3-10 regarding the SCE proposed re-route.
- E.19-31 See the response to Comment E.15-4 regarding impacts of Alternative 4 on the McMillin development and the Blue Cloud Movie Ranch. No changes to Section D.5 were warranted based on responses to comments made on Section C.12.

E.19-32 Please see the responses to Comments E.18-24, E.18-25, E.18-32, and E.18-35.

E.19-33 The assertion that the visual resource analysis does not provide a balanced comparison of the visual impacts of Alternative 5 to the proposed Project is not true. Draft EIR/EIS Section C.15.10 provides a complete and comprehensive analysis of the visual impacts that would occur under Alternative 5, including assessment of the affected environment, photographs of existing visual conditions, computer visual simulations, and descriptions of visual impacts and mitigation measures.

Quoting from page D-27,

“In general, some views of the Project alignment would have more viewers, and some viewers would be considered more critical and less accepting of environmental modifications. Both of these are factors when considering visual sensitivity. Research indicates that people visiting National Forests expect to see natural-appearing landscapes, not industrial-type elements such as transmission lines. Therefore, people driving along any of the roads in the ANF or walking/horseback-riding along the PCT would have higher expectations of seeing natural, undisturbed landscapes rather than a transmission corridor. As such, impacts to scenic views from Lake Elizabeth Road (Impact V-3), the PCT (Impact V-4 and V-27), San Francisquito Canyon Road (Impact V-5), Bouquet Reservoir (Impact V-6), Bouquet Canyon Road (Impact V-7), and Vasquez Canyon Road (Impact V-8) would be considered to have higher sensitivity and therefore more significant than visual impacts to other areas where a natural landscape is less expected.”

Areas like Leona Valley and Agua Dulce do not have management plans that require “natural appearing landscape character” or High SIO, and conversely, the Angeles National Forest does have those management plans and goals. Therefore, there is higher sensitivity on NFS lands and the term “more significant” is correct. No revision is necessary.