

Comment Set B.12: Mark Campbell, Antelope Valley Archaeological Society

Po Box 2139
Rosamond, CA 93560
Sept 27, 2006

Thank you for the opportunity to review the Draft EIR/EIS for Southern California Edison's Application for Antelope-Pardee 500-kv Transmission Project. Application No. A.04-12-007 SCH No. 2005061161.

My concern with this document is a procedural issue. The document lists evasion of archaeological sites to be impacted by the project as a mitigation measure. Evaluation of the sites should be part of the information gathering process not a mitigation measure. The stated purpose of the EIR/EIS is to "identify and evaluate potential impacts". Generally under both CEQA and Section 106 of the NHPA, evaluation of the sites is part of the information gathering process. Impacts to sites found to be eligible (Section 106) or unique (CEQA) are then mitigated. This document skips a step. As such it fails to provide adequate information to make an informed decision on potential impacts.

B.12-1

Separating this project from Segments 2 and 3 appears to be project splitting. This perception is reinforced by the more restricted distribution of the Draft EIR for segments 2 and 3 than for the Antelope-Pardee portion. We received a CD version of the EIR for the Antelope Pardee Project but only a Notice of Availability for segments 2 and 3.

B.12-2

The consultants conducting the mitigation of the sites should consult with local archaeologists to assure that local research issues are addressed in the data recovery program. Therefore, we request the opportunity to review and comment on the research design and reports generated from the mitigation program to assess their adequacy.

B.12-3

Should you have further questions regarding my concerns or other cultural resource issues please call me at (661) 400-4397.

Mark Campbell
Environmental Review Committee Chair
Antelope Valley Archaeological Society

Response to Comment Set B.12: Mark Campbell, Antelope Valley Archaeological Society

- B.12-1 Under the standard Section 106 process, all archaeological sites in the area of potential effect (APE) would have been evaluated and mitigation measures would have been provided in the EIR/EIS for the eligible sites. However, this project is being completed under a modified Section 106 process as stipulated in a Programmatic Agreement (PA) for compliance with Section 106 between the U.S.D.A. Forest Service, the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation. The PA provides unevaluated resources the same status as resources determined eligible for, or listed on, the National Register of Historic Places. In addition, the PA states that resources in a project APE need not be evaluated if it is known they will not be affected. The project being considered in the EIR/EIS has a proposed route and five alternative routes, but only one of the routes will be selected for construction. Therefore, resources on five of the six routes will not be affected. Following the PA, the resources on the routes that are not selected for construction do not need to be evaluated. When the route along which the project will be built is selected, the resources within that route's APE that will be affected by the project will be evaluated.
- B.12-2 The Antelope-Pardee Transmission Project is a separate project from Segments 2 and 3. As described in Section A.4 of the EIR/EIS, the two projects have different objectives and are independent in both construction and operation. The Antelope-Pardee project would relieve a specific existing thermal overloading problem that needs to be addressed in the near term to allow planned wind energy projects north of Antelope Substation to deliver wind power. Segments 2 and 3 would provide additional transmission capacity for potential future development of wind energy projects and has been defined as a separate project from Antelope-Pardee in CPUC Docket I. 00-11-001. The Antelope-Pardee Transmission Project has independent utility in that it has its own distinct purpose and is not dependent on other pending or planned projects for its complete construction and operation. Similarly, other projects, such as Segments 2 and 3, are not dependent on Antelope-Pardee for their construction or operation. One project does not lead to another in that the construction of the Antelope-Pardee project does not lead to the construction of Segments 2 and 3.
- Because the two projects are separate and independent, separate mailing lists were developed for each project and every party included in the document distribution list for the Antelope-Pardee project was not necessarily included on the document distribution list for Segments 2 and 3. All public notification requirements for the Antelope-Pardee project were met or exceeded (please see General Response GR-5 on noticing procedures).
- B.12-3 Your comment will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.