

Comment Set E.10: Applicant – Forest Management

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
 C.7 FOREST MANAGEMENT ACTIVITIES**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	C.7.1.2 Fire Histories and Characteristics	C.7-2	Paragraph 6, Line 5	The DEIR/DEIS references the Power Line Fire Prevention Guide (OSFM, 2001) and states that "fire protection agency statistics show that more fires start from distribution lines than from transmission lines." The Power Line Fire Prevention Field Guide provides additional language regarding the frequency of large fires started by transmission lines.	SCE suggests the following language from the Power Line Fire Prevention Handbook be incorporated: "Contrary to popular belief the large high-voltage transmission lines are not the worst offenders. In one study they accounted for less than 8 percent of the fires over 5000 acres in size. They are commonly built of sturdy materials, maintained with adequate vegetative clearances, and inspected frequently and thoroughly."
2	C.7.2.2 State Applicable State Regulations and Code	C.7-7	Paragraph 1, Lines 2 and 3	The reference to Code of Regulations Title 14, Section 1254, Minimum Clearance Provisions, discusses required clearances around poles and towers, but does not include the exemptions to this regulation.	Exemptions to Minimum Clearance Provisions – Public Resources Code (PRC) 4292 states that the minimum clearance provisions of PRC 4292 are not required around poles and towers, including line junction, corner and dead end poles and towers where all conductors are continuous over or through a pole or tower. Modify DEIR/DEIS to read: "Firebreak clearance required by PRC 4292 are applicable within an imaginary cylindrical space surrounding each pole or tower <u>unless such pole or tower is exempt from minimum clearance requirements by provisions of 14 CACCCR 1255 or PRC 4296</u> ".

E.10-1

E.10-2

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3	C.7.2.3 Local Los Angeles County General Plan 1117.1.1 Electrical Transmission Lines	C.7-7		Exceptions to Section 1117.1 of the 1996 Los Angeles County Fire Code were omitted.	Change DEIR/DEIS to include the following: "Nothing contained in this section shall be construed to require any person to maintain any clearing on land where such person does not have the legal right to maintain such clearing, nor shall any provision of this ordinance be construed to require any person to enter upon or to damage property of another without the consent of the landowner thereof. For further exceptions see Title 14, California Code of Regulations, Section 250-257 inclusive.	E.10-3
4	C.7.5 Impact Analysis: Proposed Project/Action California, Los Angeles County, City of Santa Clarita, and City of Lancaster Laws, Regulations, Goals and Policies	C.7-11	Paragraph 1, Line 10	The DEIR/DEIS states that all activities associated with the proposed project would adhere to all the applicable laws referenced and that this would be accomplished through regular vegetation clearance around the Project facilities. This language omits the exemptions under PRC 4292 for required clearing around poles and towers.	Change the DEIR/DEIS to read: "This would be accomplished through regular vegetation clearance around the Project facilities (e.g., substation, transmission towers and conductor) pursuant to the exemptions under PRC 4292."	E.10-4
5	C.7.5 Impact Analysis: Proposed Project/Action Impact F-1: Construction activities from the Project could start a wildfire	C.7-12	F-1 Develop a Fire Plan	Mitigation Measure F-1 states that SCE should prepare a Fire Plan in consultation with the Forest Service. SCE submitted a Fire Prevention and Response Plan (FPRP) to the CPUC as part of a data response on 3/8/05 (Docket No. A.04-12-007). The DEIR/DEIS references this FPRP on page C.7-8 and describes all the measures proposed by SCE to implement fire prevention and suppression.	Mitigation Measure F-1 appears to contradict the language on page C.7-8. The FPRP provided by SCE in response to a data request was prepared in consultation with the ANF as part of the recently completed Pardee-Pastoria 220 kV Reconductor Project.	E.10-5

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6	C.7.5 Impact Analysis Impact F-2: Operation and maintenance activities from the Project could start a fire	C.7-12	Paragraph 1, Lines 3 through 5	<p>The DEIR/DEIS discusses the potential fire risk from routine maintenance of the transmission line (caused by a catalytic converter on a maintenance truck). While this is possible, the Del Sur Ridge Road is a designated OHV route and is open to public access. In addition portions of this road are routinely traveled by vehicles accessing the stone quarry. The likelihood of a fire starting from an SCE maintenance vehicle is remote. The potential for a fire to start as a result of faulty transmission equipment is also remote.</p> <p>As stated in the LPM FEIS Volume 1, "Approximately 16 percent of all fires originate from lightening. Human-caused fires from campfires, recreational target-shooting, smoking, vehicle fires, equipment use and arson account for most of the damaging wildland fires." (page 307)</p>	The DEIR/DEIS should be modified to remove this language.

E.10-6

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
7	C.7.5 Impact Analysis Impact F-2: Operation and maintenance activities from the Project could start a fire	C.7-12	Paragraph 2, Line 2	<p>The DEIR/DEIS discusses that the construction and/or improvement of access roads and spur roads has the potential for increased OHV trespass and increased use by other forest users "particularly as this areas has been previously inaccessible. As the new roads would increase potential interaction of people in a fire environment dominated by flashy fuels. This could increase the potential for fire starts by forest users in areas normally not accessed by them."</p> <p>The LMP FEIS Volume 1 states that "National Forest System fire roads are also essential to successful suppression operations in southern California. These roads have begun to deteriorate because of inadequate road maintenance budgets...". (page 311) and "there is a failure of road maintenance budgets to keep up with inflation and road deterioration, road conditions on the national forest have fallen below the levels necessary for resource protection, and many cannot efficiently support the traffic volumes being carried". (page 279).</p> <p>"Road access to fuelbreaks and the national forests in general have been deteriorating... Firefighter safety is being compromised by benign neglect of the existing road system, which is considered essential to limiting wildland fire patch size and gaining access to fires in general." (LMP FEIR Volume 1, page 586)</p>	<p>Contrary to the DEIR/DEIS assertion that this area is currently inaccessible to the public, portions of the existing access road are a designated OHV route. In addition, the Pacific Crest Trail crosses the access road north of Bouquet Reservoir. The DEIR/DEIS should be modified to reflect this fact.</p> <p>Furthermore, the construction/improvement of access through this area could be considered a potential benefit to fire-fighting (see ANF LMP).</p> <p>The LMP FEIS Volume 2 (Appendices) states "Many of the roads built by the utility industry are important fire access roads within the national forests." (see page 593).</p> <p>This section should acknowledge that, per the LMP, having maintained access roads within the Angeles National Forest could provide a potential benefit to fire-fighting.</p>

E.10-7

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
8	C.7.5 Impact Analysis Impact F-3: Construction activities could adversely affect aggressive fire suppression activities	C.7-13	Paragraph 1, Line 10	The DEIR/DEIS states that if a fire were to occur, construction activities could limit emergency vehicle access and that if no bypasses are provided by SCE it would take critical additional time for SCE to open the road for access by ground fire suppression forces.	The DEIR/DEIS should be modified to reflect the following: 1. SCE's number one priority in any project construction activities is the safety of its employees and/or contractors. If a wildland fire were to occur in the project area during construction, SCE personnel and/or contractors would immediately vacate the area. 2. The proposed improvements to the existing access and spur roads needed for construction activities will also allow for numerous turn-outs along the Del Sur Ridge Road in the event complete access is needed by emergency vehicles.
9	C.7.5 Impact Analysis Mitigation Measure F-3: Helicopter Shall Cease Activities in the Event of Fire	C.7-13	Paragraph 1, Line 1	The language in this mitigation measure states "SCE shall contact ANF dispatch seven days prior to helicopter use..." SCE can comply with this Mitigation Measure for regularly scheduled operations and maintenance activities (i.e. non-emergencies).	Modify the DEIR/DEIS to read: "SCE shall contact ANF dispatch seven days prior to helicopter use <u>for routine operations and maintenance activities...</u> "

E.10-8

E.10-9

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
12	C.7.5 Impact Analysis Mitigation Measure F-5: The Project would limit the ability of fixed-wing aircraft to fill up water tanks for aerial drops.	C.17-4	Paragraph 1, Line 1	It is unlikely that SCE would be able to match the existing tower heights near Bouquet Canyon Reservoir as required in this Mitigation Measure due to increased clearance requirements for 500 kV transmission lines versus 66 kV subtransmission lines.	With the incorporation of the Super Scooper figure provided, this Mitigation Measure should be deleted. In the alternative, the Mitigation Measure should be reworded to state that "SCE shall lower tower heights near Bouquet Canyon Reservoir to the extent technically feasible."
13	C.7.5 Impact Analysis Impact F-6: The Project would adversely affect ground firefighting activities and would create a hazard for firefighting personnel,	C.7-15	Bullets One through Five	These bulleted items are older recommendations that are not based on any accepted standards. The standards cited are not applicable to all situations – fire-fighting practices around power lines will vary depending on a number of circumstances including type of fuel, flame lengths, power line voltage etc. -	Remove these bulleted items from the text.

E.10-12

E.10-13

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
14	C.7.5 Impact Analysis Mitigation Measure F-6: De-energize the Transmission Line	C.7-15	Paragraph 1, Line 3 Paragraph 1, Line 6	<p>The DEIR/DEIS appears to provide one mitigation measure for both prescribed burns (fire prevention) and emergency firefighting.</p> <p>SCE presumes this refers to fuel break maintenance activities such as prescribed burns or manual vegetation clearing. SCE does de-energize transmission lines if there is an immediate threat to firefighter safety. This request for de-energization must be made by SCE (SCE's Grid Control Center) and submitted to CAISO for approval.</p> <p>Prescribed burns are a regular occurrence throughout SCE's service territory on all National Forests. These prescribed burns are planned by the National Forests in coordination with SCE.</p>	<p>The DEIR/DEIS Mitigation should be modified to reflect that these are two separate and distinct issues one which requires coordination and the other which involve emergencies. The first issue deals with coordination of outages, if deemed to be needed, for prescribed burns. Such coordination will involve SCE scheduling outages with the CAISO. The second issue deals with firefighting activities for which SCE de-energizes facilities if there is an immediate threat to both firefighting and SCE personnel.</p>
15	C.7.5 Impact Analysis Impact F-7: Project operation could adversely affect fire prevention activities	C.7-15	Paragraph 1, Line 6	<p>The DEIR/DEIS states that maintenance of the Del Sur Ridge Fuelbreak would not include prescribe burns under energized lines due to the potential for arcing.</p> <p>SCE is willing to work with the Forest to develop appropriate outage request procedures which would allow for SCE to submit outage requests to the CAISO.</p>	<p>Revise DEIR/DEIS Mitigation to indicate that SCE will coordinate with the National Forest to request facility outage of the proposed transmission line when prescribed burns are planned.</p>

E.10-14

E.10-15

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
16	C.7.5 Impact Analysis Mitigation Measure F-7: SCE Shall Enter into a Fuelbreak Agreement with the ANF	C.7-15	Paragraph 1	As discussed in the comment above, prescribed burns under the proposed transmission line would be possible.	The DEIR/DEIS Mitigation Measure for the Fuelbreak Agreement is not needed and should be deleted.
17	C.7.5 Impact Analysis Impact F-8: Project operation would adversely affect firefighter safety	C.7-15 and 7-16	Paragraph 1, Line 3	<p>The DEIR/DEIS is written in a fashion to indicate that prescribed burns are not possible. Contrary to the language in this section, prescribed fire is an alternative for maintaining the Del Sur Ridge Fuelbreak.</p> <p>As discussed in the comment above, prescribed burns under the proposed transmission line would be possible.</p> <p>SCE is willing to work with the Angeles National Forest to de-energize the proposed transmission line to allow for prescribed burns. Therefore the argument by the Forest that the inability to use prescribed fire necessitating the use of more costly methods for fuelbreak maintenance thereby causing the firebreak to be abandoned and leading to the possible indirect effect of jeopardizing firefighter safety is not valid.</p>	<p>Revise DEIR/DEIS Mitigation to indicate that SCE will coordinate with the National Forest to request facility outage of the proposed transmission line when prescribed burns are planned.</p>

E.10-16

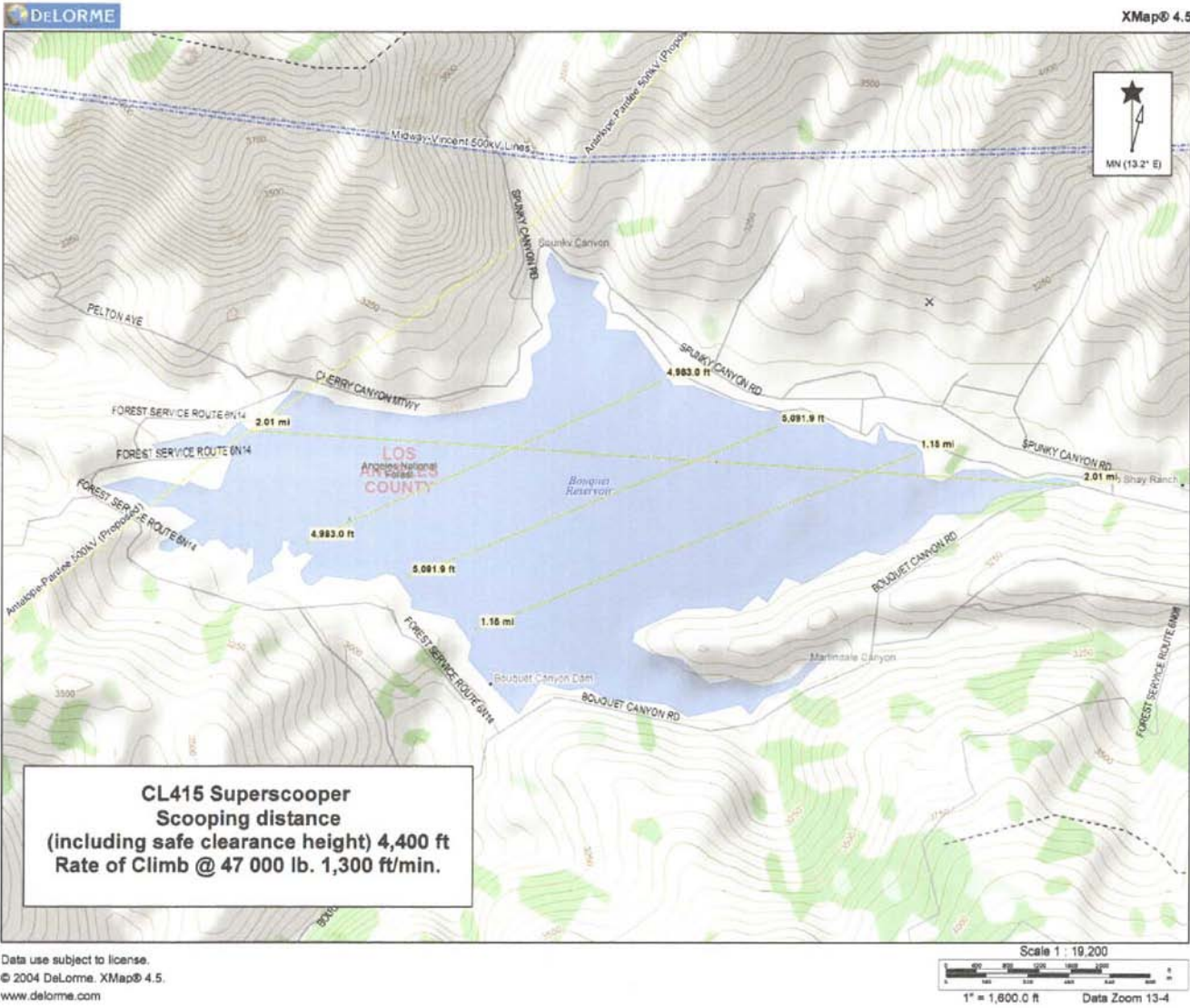
E.10-17

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
18	C.7.5 Impact Analysis Mitigation Measure F-8a: SCE Shall Enter into an Agreement with the ANF to Widen the Del Sur Ridge Fuelbreak	C.7-16	Paragraph 1	As discussed in the comments above, SCE is willing to work with the Angeles National Forest to de-energize the proposed transmission line to allow for prescribed burns. Therefore this Mitigation Measure is no longer valid and should be deleted.	The DEIR/DEIS Mitigation Measure for the Widening of the Fuelbreak Agreement is not needed and should be deleted.	E.10-18
19	C.7.5 Impact Analysis Mitigation Measure F-8b: Provide Transmission Line Safety Training to ANF Staff	C.7-16	Paragraph 1	SCE already works proactively with all firefighting agencies (National Forests, CDF, city and county), including those in the Angeles National Forest, on an ongoing basis. SCE agency representatives act as cooperating entities when an Incident Command Post is established. In addition, SCE has provided a DVD titled "Electrical Safety for First Responders" to the Angeles National Forest.	The DEIR/DEIS should be clarified to indicate the Mitigation Measure to Provide Transmission Line Safety Training to ANF Staff is already an ongoing activity.	E.10-19
20	C.7.5 Impact Analysis Impact F-9: Project operation would adversely affect community safety	C.7-16	Paragraph 1	Under emergency conditions where firefighting activities require transmission line outages, SCE will take all necessary action including de-energizing the transmission line. In addition, transmission line access roads will increase the ability for firefighters to aggressively suppress fires.	The DEIR/DEIS should be clarified to indicate these comments.	E.10-20

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
21	C.7-7.2 Alternative 2 Impacts and Mitigation Measures; Activities associated with the Project would adversely affect fire suppression activities, fire prevention activities, and firefighter and community safety	C.7-21	Paragraph 3	SCE disagrees with this language for the same reasons stated in the comments provided above.	The DEIR/DEIS should be clarified to indicate these comments.
22	C.7 General Comment			Under alternatives that remove the Antelope-Pole Switch 74 66 kV line and not replace it with a facility requiring access roads, removal of the line will result in SCE no longer maintaining the access roads. Therefore, the SCE maintained roads will not be available for firefighting activities. As such, these Alternatives are less beneficial regarding firefighting activities	The DEIR/DEIS should be modified to reflect that Alternatives 1, 2, and 5 result in a greater impact to firefighting activities.

E.10-21

E.10-22



E.10-11
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Response to Comment Set E.10: Applicant – Forest Management Activities

- E.10-1 The language in Section C.7.1.2 sufficiently and concisely describes the baseline conditions. The additional language suggested in the comment is unnecessary.
- E.10-2 As the impact analysis in the Forest Management Activities section does not address the specific minimum clearance provisions, inclusion of the exceptions to Public Resources Code 4292 is unnecessary.
- E.10-3 As the impact analysis in the Forest Management Activities section does not address maintenance of clearings without the consent of the landowner, inclusion of the suggested language is unnecessary.
- E.10-4 Please see the response to Comment E.10-2 regarding exceptions to Public Resources Code 4292.
- E.10-5 While SCE may have submitted a Fire Prevention and Response Plan (FPRP) as a data response that was prepared in consultation with ANF for the Pardee-Pastoria 220-kV Reconductor Project, as ANF has stated that this FPRP is insufficient for the Antelope-Pardee 500-kV Transmission Line Project, SCE is required under the mitigation to prepare a Fire Plan in consultation with ANF that addresses these insufficiencies. No change will be made to the mitigation.
- E.10-6 Although the likelihood of an SCE maintenance vehicle or faulty transmission equipment starting a fire is remote, the analysis in the Forest Management Activities section is addressing activities associated with the project increasing the potential to start a wildfire. The recreation and commercial uses of Del Sur Ridge Road described in the comment are considered to be characteristic of the existing conditions, while the maintenance and operation of the 500-kV transmission line would be new activities and are analyzed as such. No change will be made to the discussion.
- E.10-7 As the ANF has suggested Mitigation Measure R-4 (Permanent Closure and Re-vegetation of Construction Roads) to limit OHV trespass, the benefits suggested in this comment would not be obtained. No additional language will be added.
- E.10-8 SCE was provided multiple opportunities, both in the application process and through responses to data requests to provide information such as described in the comment. As this was not provided for inclusion in the application or the data responses, this information cannot be considered part of the project's description. Consequently, the issue of disruption of emergency services due to construction was analyzed without this material and is mitigated through Mitigation Measure T-1a (Prepare Traffic Control Plans) from Section C.13, Traffic and Transportation. No change will be made to the discussion.
- E.10-9 Mitigation Measure F-3 (Helicopters Shall Cease Activities in the Event of Fire) was written specifically to address helicopter use during construction activities which would not be included in the suggested revision. No change will be made to the mitigation.
- E.10-10 Although SCE is required to provide an updated map of the transmission line with tower heights to the Unit Aviation Manager, the new tower heights would remain an increased aviation hazard. The suggestion of lowering tower heights at specific locations or locating towers off the top of ridgelines has already been incorporated into other mitigation measures such as Mitigation Measure F-5 (Site

- and Design Towers to Match Existing Height). No changes will be made to the analysis or mitigation.
- E.10-11 Although the flight paths provided in the attached map for “Super Scooper” may be safe approaches to Bouquet Canyon Reservoir from the perspective of the transmission lines, during a wildfire there is no guarantee that any of these approaches may be safe with respect to the location of the wildfire. The height and location of the new towers would still restrict the use of “Super Scooper” aircraft and increase their potential for aerial collision. No changes will be made to the analysis or mitigation.
- E.10-12 Although the increased height requirements for a 500-kV transmission line may make siting of towers difficult to match the existing tower heights near Bouquet Canyon Reservoir, with the topography of the area, SCE should be able to design and alignment that would allow this to be accomplished. Please refer to Response to Comment E.10-11 regarding mitigation for this impact. No changes will be made to the analysis or mitigation.
- E.10-13 Regardless of SCE’s opinion as to whether these bulleted items are based on accepted standards, as the standards listed in bullets one through five were received from ANF as their guidance for firefighting activities in the vicinity of transmission lines and the impact analyzed is within ANF, these guidelines are taken as ANF’s standards. No change will be made to the discussion.
- E.10-14 Prescribed burns coordinated with SCE have not been a regular occurrence in ANF along the 66-kV transmission line route as SCE claims in its comment. Consequently, there is no evidence to support the claim that SCE would coordinate outages for prescribed burns during the operation of the 500-kV transmission lines. Consequently, the de-energization of transmission lines for both fire prevention and fire suppression is dealt with in the same mitigation measure. No changes will be made to the mitigation.
- E.10-15 Please see the response to Comment E.10-14 regarding mitigation requiring de-energization of transmission lines.
- E.10-16 Please see the response to Comment E.10-14 regarding mitigation requiring de-energization of transmission lines. As no changes would be made to the mitigation, Mitigation Measure F-7 (SCE Shall Enter into a Fuelbreak Agreement with the ANF) will also remain unchanged.
- E.10-17 Please see the response to Comment E.10-14 regarding mitigation requiring de-energization of transmission lines.
- E.10-18 Widening of the Del Sur Ridge fuelbreak is unrelated to prescribed burns. The intent of widening the fuelbreak is to allow for safety for ground fire fighting forces making a stand at the fuelbreak. Mitigation Measure F-7 (SCE Shall Enter into a Fuelbreak Agreement with the ANF) will remain unchanged.
- E.10-19 As described in the response to Comment E.10-8, SCE was provided multiple opportunities, both in the application process and through responses to data requests to provide information such as described in the comment. As this was not provided for inclusion in the application or the data responses, this information cannot be considered part of the project’s description and was not analyzed as such. While SCE may provide generic safety training to ANF staff with a DVD, the ANF requested that Mitigation Measure F-8b (Provide Transmission Line Safety Training to ANF Staff) be required to provide regular and appropriate transmission line safety training to their staff,

which includes, but is not limited to first responders. No changes will be made to the analysis or mitigation.

- E.10-20 Please see the response to Comment E.10-14 regarding mitigation requiring de-energization of transmission lines and the response to Comment E.10-7 regarding access roads.
- E.10-21 Please see the response to Comment E.10-5 regarding development of a Fire Plan with the Forest Service.
- E.10-22 The ANF has argued that SCE's maintenance of the 66-kV transmission line access roads provides little to no existing benefit to firefighting activity and consequently, the removal of the 66-kV transmission line and SCE stopping maintenance of the access road would have minimal impact on firefighting activities other than allowing for prescribed burns which would make later firefighting activities easier. No change will be made to the discussion.