

## Comment Set A.8: City of Santa Clarita

City of  
Santa Clarita

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September 29, 2006

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Julie Halligan  
Administrative Law Judge  
Room 5101  
505 Van Ness Avenue  
San Francisco, CA 94102

BY:.....

Subject: Antelope-Pardee 500-kV Transmission Project  
California SCH #2005061161  
Federal Docket No. 05-12734

Dear Judge Halligan:

The City of Santa Clarita has reviewed the Draft Environmental Impact Report/Statement for the above-referenced project. The proposed project and all of the alternatives will result in significant immitigable impacts to the City and to the City's Sphere of Influence (SOI). As such, the project and its alternatives, as proposed, are unacceptable to the City of Santa Clarita.

The City's boundaries were recently extended north with the completion of the Northpark annexation in March. The maps included in the EIR/EIS do not reflect these recent changes. As a result, the project will impact larger areas in the City and a larger number of City residents than is indicated in the document. Furthermore, the City's SOI extends north from City boundaries to the edge of the National Forest. In establishing this SOI, the Local Agency Formation Commission has designated the southern edge of the Angeles National Forest as the "probable physical boundaries" of the City (see enclosed map of SOI). As such, the City has a vested interest in land use decisions in this area.

A.8-1

The City opposes this project. The City of Santa Clarita and the Santa Clarita Valley (SCV) have more than their fair share of utility corridors and the power lines and other transmission facilities within them. For decades the City and SCV have borne the burden of these corridors, their adverse visual impacts, land use limitations, limitations of property values, and community-dividing nature. The City and the SCV are crossed by no fewer than eight of these corridors. It is unfair and unjust to burden the City and the SCV yet again with additional transmission lines, let alone, transmission lines and structures of such an immense scale as those proposed.

A.8-2



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The City strongly urges that an alternative project that does not result in additional towers and transmission lines through our Valley be considered, such as collocating the transmission lines on existing facilities or improving transmission capacity in another location outside the SCV.

A.8-3

### Project Alternatives

The proposed project and all of the alternatives, with the exception of the No Project Alternative, will result in immitigable impacts to the environment. Per CEQA, project alternatives are intended to provide alternatives that result in fewer significant impacts to the environment. However, it appears that none of the alternatives (with the exception of No Project) effectively does this. Each alternative is intended to address a particular potentially significant impact of the proposed project, but in doing so either shifts the impact to another area or results in a different significant impact.

For instance, though alternative 5 addresses many biological issues in the National Forest, it will have tremendous negative impacts to aesthetics, property rights, and the quality of life to a significant number of people. Though Alternative 4 avoids the visual and noise impacts to the Valuzat Movie Ranch and proposed Meadow Peak project, it will redirect the transmission lines to abut existing residential communities, simply relocating these significant impacts, not mitigating them. Alternative 3 changes the tower design, but still results in the same significant immitigable visual impacts.

A.8-4

The preferred alternative simply becomes a judgment call as to what significant impacts can be tolerated and by whom, not a decision based on the overall reduction of impacts, as is required by CEQA. Therefore, the City cannot wholeheartedly support any of the alternatives, with the exception of No Project.

The City has the following recommendations:

1. *No Project Alternative:* Due to the significant immitigable impacts that the proposed project and all of the existing alternatives will have on the environment, the City recommends that this alternative be adopted.
2. *New Project Alternative:* With the exception of the No Project Alternative, none of the proposed Alternatives, whether alone or combined, adequately mitigate the significant impacts to the environment and specifically to the City and the City's SOI. Therefore, the City recommends that a new alternative route be evaluated that avoids both densely and sparsely populated areas. The City recommends that the route, or a similar route, identified on the enclosed

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map be evaluated and considered. The route would extend generally north from the Pardee substation, then generally northeast along the unoccupied eastern edge of the County's Pitchess Detention facility, then generally north into or close to the Angeles National Forest where it can then head east to the existing right-of-way then north along the proposed route to the Antelope Valley. This route avoids residential communities as well as developed areas in general. The majority of the potential impacts and concerns identified with the proposed project and the alternatives would be reduced and/or eliminated altogether.

This Alternative would:

- Significantly reduce/eliminate many of the visual, noise, air quality, and land use impacts of the project and all of its alternatives by eliminating the prospect of towers/transmission lines through both rural and urban residential communities;
- The location away from residential communities would eliminate or reduce the concerns of EMF and other health-related issues of the project and all of the alternatives;
- Avoid impacts to both the Valuzat Movie ranch, the proposed Meadow Peak project, and the Bouquet Canyon Stone Company;
- Avoid the traffic disruptions and high cost of undergrounding the lines through the large section of the City and urbanized area.

The City strongly urges that this Alternative be evaluated and considered in the EIR/EIS, as it is likely to reduce potential impacts to the environment well beyond the project and existing alternatives.

3. *Alternatives 1 and 4:* The City's third option would be a combination of Alternatives 1 (as it relates to the City and SOI) and 4, with modifications.

The City supports the under-grounding of the transmission lines to the fullest extent possible as identified in Alternative 1. The City would prefer that the transmission lines be undergrounded beyond what is identified in this Alternative, if feasible.

The City also recognizes the socioeconomic value of the Valuzat movie ranch to the region and supports Alternative 4 that eliminates impacts to the ranch. However, the City believes it inappropriate to force negative impacts to the existing residential communities in the area by redirecting the transmission lines around the proposed Meadow Peak project, a project that is merely proposed at this time and has not been approved. The maps used in the EIR do

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not reflect recent residential development in the area, residential development that would abut the redirected transmission lines.

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cont'd

In addition, at the locations where undergrounding is infeasible, the City requests that tubular steel monopoles be utilized instead of the lattice-type towers.

A.8-9

4. The City strongly opposes Alternative 5. Of all the Alternatives, with the exception of No Project, this alternative will adversely impact the most residents, cause the greatest and most extensive negative aesthetic impacts, result in loss property rights and potentially the condemnation of property/homes, and create the greatest impacts to the City's SOI, while doing nothing to address the impacts within the City itself.

A.8-10

Thank you for the opportunity to review this project. Please do not hesitate to contact me should you have any questions.

Sincerely,



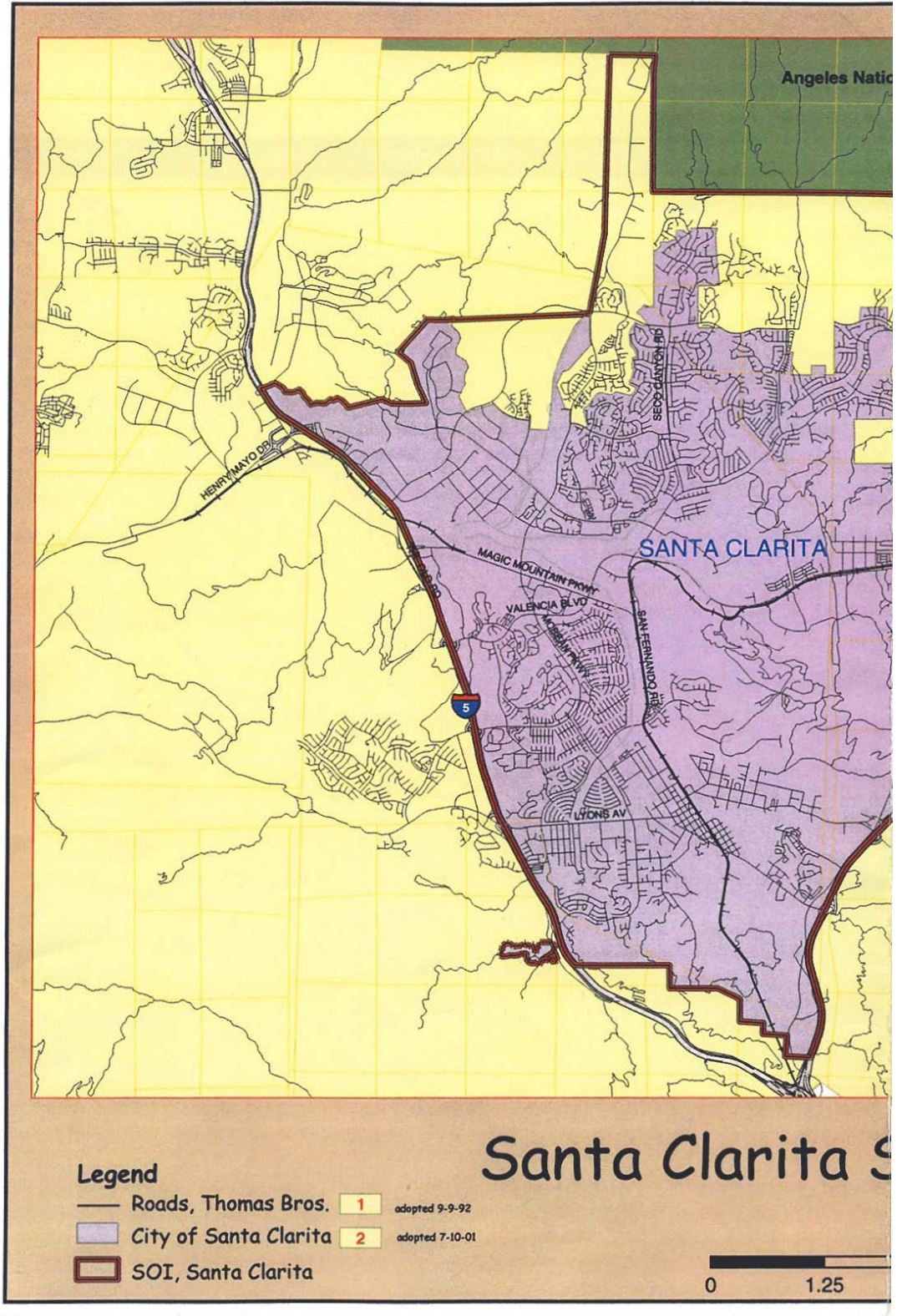
Paul Brotzman  
Director of Community Development

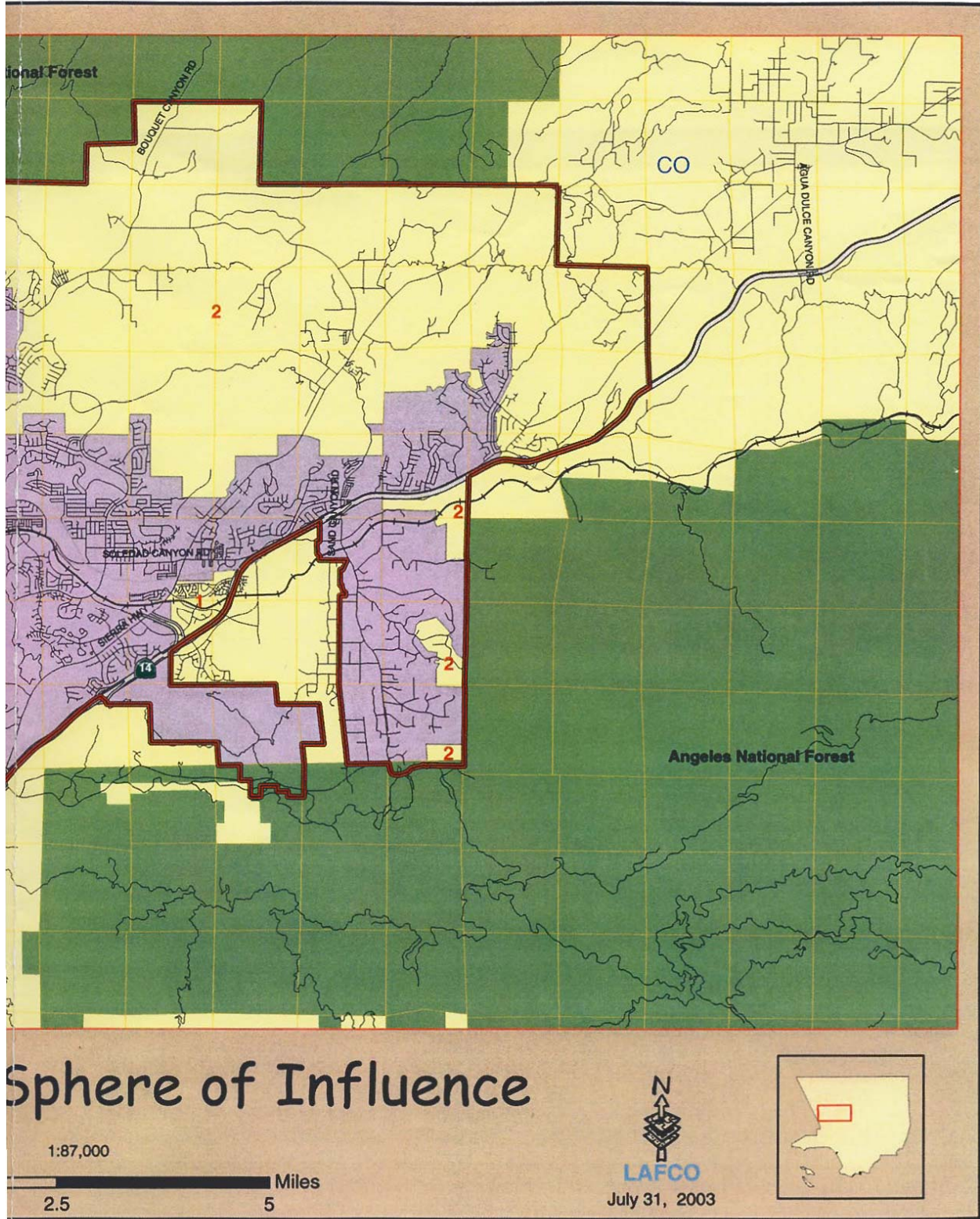
Enclosures

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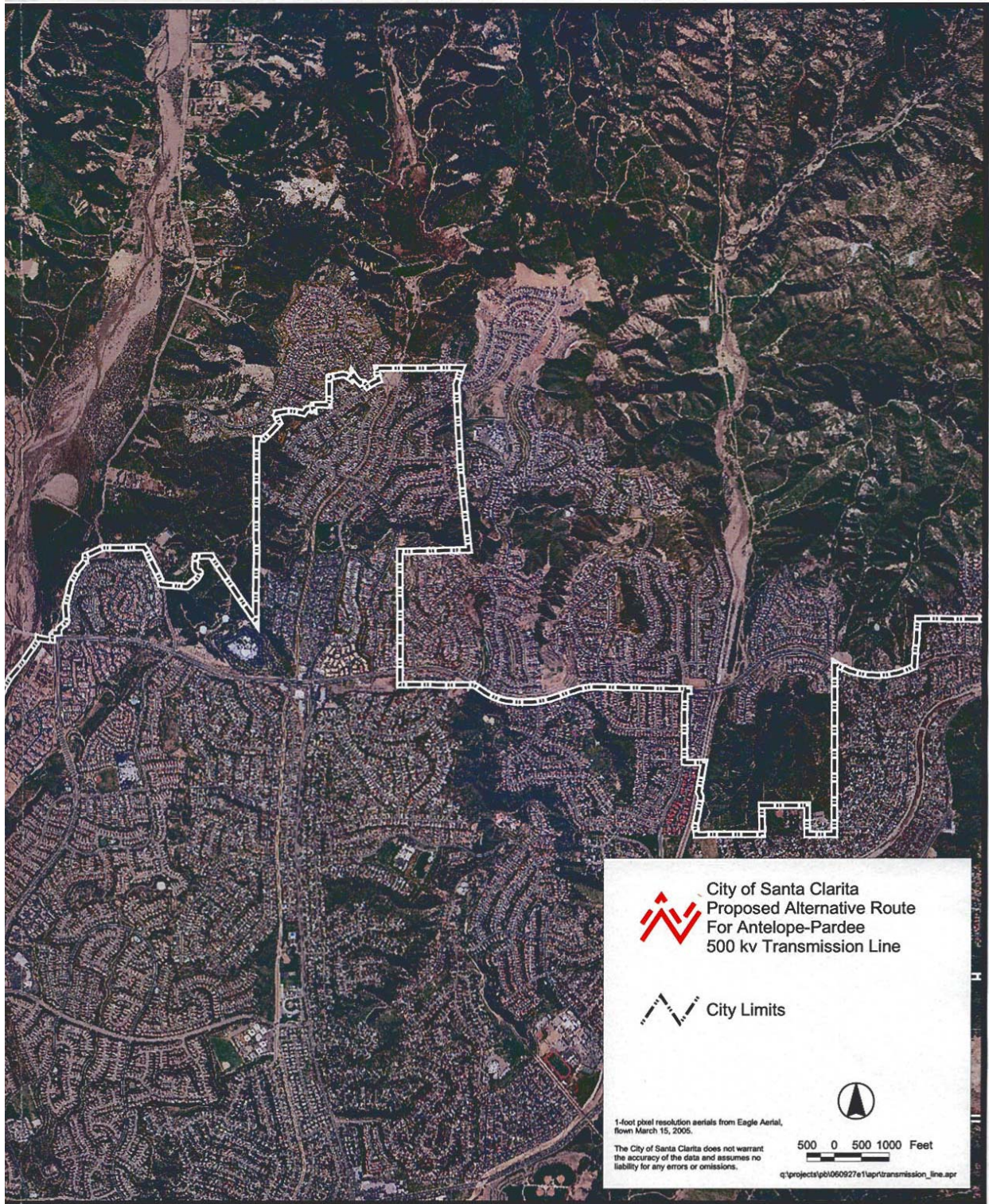
S/CD/CURRENT/County Monitoring/Edison Lines/EIR-EIS comments

cc: John Boccio/Marian Kadota, CPUC/USDA Forest Service  
Representative Howard P. "Buck" McKeon  
Senator George Runner  
Assemblymember Keith Richman  
Assemblymember Sharon Runner  
Assemblymember Audra Strickland  
Supervisor Michael Antonovich  
Ken Pulskamp, City Manager  
Kai Luoma, Senior Planner  
Elin Davidsön, AICP, Aspen Environmental Group











## Response to Comment Set A.8: City of Santa Clarita

- A.8-1 Thank you for providing the updated information on the City of Santa Clarita Sphere of Influence. The maps provided in the Draft EIR/EIS reflect the City of Santa Clarita boundaries at the time the Notice of Preparation (NOP) was published, which occurred in June 2005. The maps within the Final EIR/EIS have been updated to reflect the new City boundaries, including Figures ES-1 and B.2-1 (Regional Location Map), C.8-2 (FEMA-Designated Flood Hazard Areas), C.9-1 (Jurisdictions and Notable Land Uses Along Project and Alternative Routes), and C.8-4 (Hydrologic Sub-Areas for the Proposed Project and Alternatives). The Land Use discussion has also been updated accordingly. The expanded Sphere of Influence does not change the analysis of impacts in the EIR/EIS.
- A.8-2 Thank you for submitting your opinion on the Project. The reasons for the proposed location of the new transmission line are discussed in Sections A.1 through A.5 of the EIR/EIS.
- A.8-3 Thank you for stating your opinion regarding alternatives. Please see General Response GR-4 regarding alternatives identification, screening, and analysis. Alternatives that considered collocating transmission lines and improving capacity outside the Santa Clarita Valley included the Antelope-Vincent 500-kV Line in New Corridor Alternative and the Antelope-Vincent 220-kV Double-circuit in New Corridor Alternative. Other transmission alternatives were also considered that would limit impacts to the Santa Clarita Valley, such as the Antelope-Mesa Replacement Alternative and the Big Creek-Fresno Phase-Shifted Tie. These alternatives and the reasons for elimination are discussed in the Alternatives Screening Report, located in Appendix 1 of the Draft EIR/EIS.
- A.8-4 As discussed in the Alternatives Screening Report located in Appendix 1 of the Draft EIR/EIS and in General Response GR-4, alternatives to the proposed Project were identified that would meet CEQA, NEPA, and Forest Service requirements. NEPA requirements for consideration of alternatives are broader than those of CEQA and, in the interest of broadening the range of alternatives considered, the Lead Agencies elected not to be limited by CEQA's narrower requirements. While CEQA requires that an alternative "avoid or substantially lessen any of the significant effects of the project", NEPA requires that all reasonable alternatives be explored, where "[r]easonable alternatives include those that are practical or feasible from the technical and economic standpoint". As such, alternatives under NEPA are not required to avoid or lessen the significant effects of a project, thereby resulting in a broader range of alternatives considered than would have been evaluated under CEQA alone. However, reduction in significant impacts was a key consideration in selecting and evaluating alternatives. By their nature, not all impacts associated with a 500-kV transmission line project can be avoided or reduced to a less-than-significant level. Therefore, a primary consideration in selecting and evaluating alternatives is the location, or routing, of the transmission line. In order to make the necessary connections within the transmission system needed to accomplish the objectives of the Project, a limited number of feasible routes are possible. Options other than routing, such as tower design, and alternative technology, such as undergrounding, were also evaluated in the EIR/EIS. As a result, a broad range of feasible alternatives were evaluated in the EIR/EIS.

A.8-5 Thank you for providing your recommendations on the Project. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC. The consequences of the No Project/Action alternative are discussed in the EIR/EIS.

A.8-6 Thank for your suggestion for a potential alternative to the Project. As discussed in detail in General Response GR-4 and Appendix 1 (Alternatives Screening Report) of the Draft EIR/EIS, a reasonable range of alternatives was identified for the Project in accordance with CEQA requirements.

As explained below, the City's proposed alternative is substantially similar to the reasonable range of alternatives evaluated in the EIR/EIS and would not result in substantial environmental advantages when compared to the proposed Project or the alternatives analyzed in the EIR/EIS. Furthermore, and as explained below:

- The City's proposed alternative, unlike the portion of the Project alignment and alternatives (except Alternative 1) that would be replaced by the alternative, would not be located within an existing transmission line corridor and would require the establishment of new ROW through undeveloped lands;
- The City's proposed alternative would result in similar impacts to those already analyzed in the EIR/EIS for the Project and alternatives with respect to Forest Management Activities, Public Services, Socioeconomics, Traffic and Transportation, and Utilities and Service Systems;
- The EIR/EIS evaluates alternatives which accomplish the same goal as the City's proposed alternative of providing a transmission line between the Antelope and Pardee Substations and avoids or reduces the same impacts, specifically impacts to existing and future land uses as well as noise sensitive land uses, which the City's proposed alternative is intended to avoid, through other route alternatives and resource-specific mitigation measures; and
- In most cases, the City's proposed alternative would simply shift Project-related impacts from one location to another.

**Establishment of a New 500-kV Transmission Line Right-of-Way (ROW) and New Access Roads.** The suggested alternative would require the establishment of approximately 8.5 miles of new ROW within the Santa Clarita area for a 500-kV transmission line (with a minimum width of 180 feet) through undeveloped lands (assuming the alternative turns east to rejoin the proposed Project route at approximately Mile 18.6). Within the City of Santa Clarita, the proposed Project and alternatives would be placed within the existing Pardee-Vincent ROW. No expansion of the Pardee-Vincent ROW would be required. The proposed Project, Alternative 2, and Alternative 3 would require 1.7 miles of new ROW in the Santa Clarita area, although no new ROW would be required within the City limits; Alternative 1 would require 3.5 miles of new ROW; and Alternative 4 would require 2.5 miles (all these require an additional 1.1 miles of new ROW leaving Antelope Substation). The establishment of 8.5 miles of new ROW on undeveloped lands, as suggested by the City's proposed alternative, would increase visual impacts, as the natural-appearing landscape would be dominated by industrial structures. Furthermore, the City's proposed alternative would result in a longer alignment (approximately 27.1 miles) than the proposed Project (25.6 miles), Alternative 2 (26.7 miles), Alternative 3 (25.6 miles), and Alternative 4 (25.9 miles), as described in Draft EIR/EIS Section B. A longer alignment along new ROW where access has not been previously established would result in increased air quality impacts compared to these alternatives

due to the longer length of the alignment and the establishment of additional access roads (see air quality discussion below).

Within the Santa Clarita area, the proposed Project and Alternatives 2 through 4 would be placed within the existing Pardee-Vincent transmission corridor. The existing single-circuit towers would be replaced by double-circuit towers within this existing corridor. The long-term effect of the Project within the City of Santa Clarita would be the visual difference in tower heights between single-circuit 500-kV towers, which range in height from 113 to 178 feet, and double-circuit 500-kV towers, which range in height from 175 to 220 feet. However, with the suggested alternative new visual and biological impacts would result from placing the transmission towers along approximately 4.9 miles of relatively undisturbed natural habitat where no existing transmission line exist. Thus, the City's suggested alternative would have greater impacts to the natural environment than the proposed Project because it would create new ROW, traverse more open land, and affect more areas of relatively undisturbed natural habitat.

**Creation of Land Use Conflicts Due to the Establishment of a New ROW.** The City's proposed alternative would avoid impacts to the Veluzat Motion Picture Ranch and the proposed Meadow Peak Project. However, these impacts have already been addressed by Alternative 4, as evaluated in the EIR/EIS in Section C.9.9.2. Furthermore, the City's suggested route alternative would impact future development planned in the area around the new route, as well as existing development, including:

- Traversing the edges of the Tesoro del Valle Development Project (Table B.5-1, Cumulative Projects List, Map ID 11 development project);
- Bisecting the proposed Tapia Ranch 405-home residential development project site (Tract 53822);
- Traversing the Castaic Creek Trail, which is a designated State trail in unincorporated Los Angeles County;
- Traversing both known (the Hondo Rancho and Wayside Canyon oil and gas fields) and potential oil and natural gas extraction areas, as well as various producing, idle, and abandoned oil and natural gas wells just north of the City limits;
- Traversing the Castaic Conduit, a pipeline owned by the Castaic Lake Water Agency (CLWA) that is used to deliver water to purveyors; and
- Traversing the Los Angeles County property that is part of the Pitchess Detention Center.

Additionally, whereas the proposed Project and all alternatives (except Alternative 1) presented in the EIR/EIS result in less-than-significant impacts (Class III) to the Bouquet Canyon Stone Quarry, these impacts would not be avoided by the City's proposed alternative. The City's proposed route would follow the proposed Project route until approximately Mile 18.6 and then turn west, deviating from the proposed Project route. The Bouquet Canyon Stone Quarry is located near proposed Project Mile 13.4, and as such would continue to be impacted by the City's proposed route, same as the proposed Project.

**Creation of New and/or Greater Environmental Impacts.** Although the City's suggested route alternative may reduce or avoid some of the Project's and alternatives' impacts on the human environment such as construction noise and visual impacts (taller towers would be the only visual difference from existing conditions), the new route would create a number of new impacts as described below, such that it would have greater adverse effects on the natural environment than the proposed Project.

**Biological Resources.** Implementation of this new alternative would have greater impacts to biological resources than the proposed Project. For example, this new alternative would be located almost entirely in relatively undisturbed native habitat consisting of contiguous coastal sage scrub habitat, riparian scrub, and oak woodlands, as opposed to the existing more urbanized ROW in the City of Santa Clarita, which is characterized by a narrow band of coastal sage scrub habitat bordered by residential development. As such, greater temporary and permanent loss of native vegetation communities would occur for the City's proposed alternative compared to the proposed Project or any of the alternatives for the same segment of the route.

Large sections of contiguous open space, greater than one mile in width in many locations, would be crossed with this new alternative. Plant communities in the re-routed portion of this alternative have a greater likelihood of supporting sensitive plants and wildlife when compared to the existing ROW based on the lack of disturbance, variety of structurally diverse habitat types, available prey base, and connectivity to open space. Construction activities and increased vehicular traffic through these undeveloped areas would also disturb wildlife species to a greater degree than the proposed Project by interfering with breeding or foraging activities, altering movement patterns, or causing animals to temporarily avoid areas adjacent to the construction zone.

The re-routed portion of the City's proposed alternative also has a significant likelihood of being utilized as a wildlife corridor. The area from Castaic Creek through Tapia Canyon to San Francisquito Creek and along NFS lands supports broad sections of open space and riparian corridors. Unlike the proposed Project where existing access roads have generally been established along the alignment, the City's alternative would require the development of new access and spur roads. Vehicle traffic associated with both construction and maintenance activities could impede wildlife movement along this corridor.

Implementation of this new alternative would also result in future impacts from the development of new access and spur roads when compared to the proposed ROW, where access roads have previously been established. Although these impacts potentially could be mitigated, the new alternative would result in greater impacts to sensitive species than the proposed Project, which would be located in an existing ROW. Therefore, based on the disparity of existing biological conditions of the two routes there would be not be a reduction in biological impacts with the implementation of the City's suggested route alternative, and would likely result in greater biological impacts.

**Air Quality.** The City's suggested alternative would have greater air pollutant emissions resulting from construction, specifically because the route would be approximately 1.5 miles longer, new access and spur roads would need to be created, and more travel on unpaved roads would be required due to the undisturbed nature of the area.

**Cultural Resources.** An in-person records search completed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, and a review of the City of Santa Clarita historical list was conducted for the City's suggested alternative. Six previously recorded cultural resources and two isolated prehistoric artifacts are located in or within one-quarter mile of the alternative route Area of Potential Effect (APE) as shown in Table 1, below. Four of the six cultural resources are within the alternative route APE. All resources are from the historic period. No cultural resources within the APE have been listed on the California State Historic

Resources Inventory, the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks, or the California Points of Historical Interest.

Historic maps were also reviewed to determine whether historical structures may be present. The 1941 USGS Santa Susana 15 minute quad indicates one building (probably a house) on the east side of San Francisquito Canyon, where the Santa Clarita Alternative crosses into the ANF. This building is not shown on the current USGS Newhall quad, indicating it has been demolished. However, there could be an historical archaeological site at this location. The 1903 Santa Susana USGS 15 minute quad shows a building in Tapia Canyon along the alternative route near the location of CA-LAN-1447H. This may be the house (no longer extant) that was part of the homestead site recorded as CA-LAN-1447H.

The records search results indicate that there is a low potential for prehistoric sites in the Santa Clarita alternative route APE and a moderate potential for historic sites. It should be noted, however, that this assessment is based on a very small previously surveyed sample.

**Table 1. Previously Recorded Cultural Resources Within One-Quarter Mile of the Santa Clarita Alternative APE.**

Trinomial or Primary Record #	Historic/Prehistoric	Description	In ANF	In APE	Recorded by
P19-003081	Historic (early 20 <sup>th</sup> century)	Mining excavations, structures, and artifacts	Yes	Yes	Vance & Milburn DPR Record (2001)
P19-186857	Historic (1930s)	SCE Antelope PS 74 transmission line	Yes	Yes	Romani DPR Record (2002)
CA-LAN-2132H	Historic (1917)	LADPW Transmission Line	Yes	Yes	Macko DPR Record (1992)
CA-LAN-1447H	Historic (early 20 <sup>th</sup> century)	Homestead structural remains and artifacts	No	Yes	Parr DPR Record (1988)
19-120077	Historic	Tree lines possibly representing a destroyed homestead site	No	No	Ahmet DPR Record (2005)
CA-LAN-2072H	Historic	Sparse refuse scatter	No	No	Rasson DPR Record (1992)
P19-100480	Prehistoric	Isolated Artifact: Quartz chopper	Yes	Yes	Vance & Milburn DPR Record (2001)
P19-100481	Prehistoric	Isolated Artifact: Andesite core	Yes	Yes	Vance & Milburn DPR Record (2001)

The survey data for the proposed Project along the portion through Santa Clarita shows that it would affect two historical archaeological sites, CA-LAN-3131 and CA-LAN-3132. The records search data for the City’s proposed alternative shows that it would affect two historical archaeological sites, CA-LAN-1447H and P19-003081. Because only a small portion of the City’s suggested alternative has been field surveyed, more sites are likely to be identified along this route alternative once it is completely surveyed. Thus, this route alternative would likely affect more cultural resources than the proposed Project route.

**Geology, Soils, and Paleontology.** Landslides hazards along this alignment are higher than the proposed Project from approximately Mile 18.6 to Mile 22.5 where this alternative crosses hills and valleys with many mapped small and moderate sized landslides, primarily in the Saugus and Castaic Formations. Implementation of the Project in the area suggested by the City would lead to a higher potential for damage to the transmission line resulting from landslides, earth flows, and debris

slides, because this area has more mapped landslides than where the proposed route would be located within the portions it is intended to replace.

**Hydrology and Water Quality.** A total of five minor mountain stream or valley wash crossings would occur for the proposed Project within Santa Clarita, whereas the re-routed portion of the new alternative would cross seven streams due to the additional hilly/mountainous terrain traversed by this alternative. These additional crossings would increase the likelihood for construction activities to degrade water quality, both resulting from soil erosion and sedimentation caused by construction activities, which are likely greater in steep terrain, and from accidental release of potentially harmful materials during construction activities.

**Noise.** With respect to long-term noise impacts such as corona noise, these impacts were determined to be less than significant for the proposed Project and all alternatives, as discussed in the Draft EIR/EIS Section C.10. Other long-term noise impacts would include impacts to the Veluzat Motion Picture Ranch. While the City's proposed alternative would avoid the Veluzat Motion Picture Ranch, which would otherwise be impacted by the proposed Project, Alternative 4 would also avoid the ranch (No Impact) as discussed in the Draft EIR/EIS in Section C.10.9.2. Short-term noise impacts would include construction noise, which could impact sensitive receptors along the alignment. Overall, the proposed Project and all alternatives, including the City's proposed alternative, would result in significant unavoidable temporary noise impacts during construction. Furthermore, overall construction noise impacts associated with mobile construction equipment would occur over a longer period of time as a result of this alternative being 1.5 miles longer than the proposed Project and would require more new ROW resulting in the need to build (and maintain) more access and spur roads. Mitigation measures have been proposed to reduce noise impacts during construction to the extent feasible, including restricting nighttime construction noise in the City of Santa Clarita (MM N-1a), providing advanced notification of construction (MM N-1b), and providing shields for stationary construction equipment (MM N-1c).

**Public Health and Safety.** Where this new alternative deviates from the proposed Project, it would cross through primarily undeveloped hill and valley terrain and the eastern ends of both the active Honor Ranch gas field and the active Wayside Canyon oil field. The Honor Rancho field in the project vicinity is primarily used for gas storage by SoCal Gas and is dotted with many gas injection wells and a few idle and abandoned oil wells. The Wayside Canyon field is an old field that has been revitalized and is being pumped with new techniques in the project vicinity and is dotted with active oil and gas wells and a few old abandoned wells. The City's suggested route alternative crosses through active portions of the Hondo Rancho and Wayside Canyon oil and gas fields. In addition, this alignment crosses areas historically and currently used for oil and gas extraction. Excavation for tower foundations and grading for access roads are likely to encounter petroleum contaminated soil due to previously unknown spills or improper disposal of drilling wastes. Additional hazards in the oil fields also include encountering unknown abandoned or improperly abandoned oil/gas wells during excavation. Based on these impacts, this alternative has a greater likelihood of encountering unknown hazardous materials and added hazards related to abandoned oil wells.

**Visual Resources.** From a visual impact standpoint, the City's proposed alternative involves trade-offs. While effects on views at key observation points in Santa Clarita would be avoided or reduced by the City's proposed alternative, this alternative would introduce views of transmission infrastructure into areas where no such infrastructure currently exists. Specifically, the proposed

alternative would add transmission lines across 3.7 miles of open land where no transmission lines currently exist. In contrast, the proposed Project would primarily place the transmission lines in existing transmission corridors. Through the City of Santa Clarita, the proposed Project would replace existing single-circuit 500-kV towers with new taller double-circuit 500-kV towers in an existing transmission line corridor (no expansion necessary), rather than introducing new towers into areas where transmission towers do not currently exist. As such, the City's proposed alternative would have a greater impact on visual resources by introducing transmission infrastructure into natural areas where such infrastructure does not currently exist. In addition, although the City's proposed alternative would introduce this new transmission infrastructure in an undeveloped area of the City with fewer existing viewers, it would impact views from future development projects in the area, such as those discussed above under "Creation of Land Use Conflicts Due to the Establishment of a New ROW".

**Summary.** The new alternative suggested by the City of Santa Clarita would result in greater adverse effects on the natural environment than the proposed Project, primarily because it would traverse a substantially greater amount of undisturbed natural habitat area, as well as natural streams and drainages. It would also have a greater impact on visual resources by introducing transmission infrastructure into natural areas where such infrastructure does not currently exist. Because the re-routed portion of the suggested alternative traverses more natural areas and less developed area than the proposed Project, it would generally have fewer impacts on the human environment, including construction-related impacts on adjacent land uses. From an environmental perspective, the permanent visual and biological impacts to the natural environment resulting from the suggested alternative are considered more significant than the temporary impacts from construction on the human environment or the long-term visual difference in tower heights which would result from the proposed Project and/or Alternatives 2 through 4. As this alternative would not result in overall environmental benefits over the proposed Project, or the alternatives analyzed in the EIR/EIS, and is not significantly distinguishable from the alternatives considered and results in substantially similar consequences, it has not been incorporated into the Final EIR/EIS.

Neither NEPA nor CEQA requires a separate analysis of alternatives which are not significantly distinguishable from alternatives actually considered or which have substantially similar consequences. The decision-makers are already presented with a reasonable range of alternatives and choices for selection of an alternative that would avoid the impacts addressed by the commenter's suggested alternative. Therefore, a detailed analysis of your suggested alternative will not be added to the Final EIR/EIS. However, your concerns regarding effects to the City of Santa Clarita will be shared with decision-makers who are evaluating the Project and alternatives at the Forest Service and CPUC.

- A.8-7 Thank you for providing your recommendations. These 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-6 regarding the feasibility and other considerations of underground construction.
- A.8-8 Thank you for your comments regarding Alternative 4. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.

The EIR/EIS preparers provided maps that were the most current available at the time the Draft EIR/EIS was prepared and understand that recent development would not be reflected. Site visits

were conducted in May and July 2005 to verify conditions and note new development; however, due to how much development is currently occurring in the Santa Clarita area at this time, not all new development would have been assessed in the Draft EIR/EIS. Per CEQA Guidelines Section 15125 (a), the baseline environmental conditions by which the lead agency determines whether an impact is significant is established based on the physical environmental conditions at the time the notice of preparation is published. The notice of preparation was published and available for public review June 28, 2005.

- A.8-9 Per Mitigation Measure V-1a (Use Tubular Steel Poles), locations for use of tubular steel poles will be designated by the CPUC and USDA Forest Service to reduce significant visual impacts as seen from sensitive receptor locations. Your comments regarding use of tubular steel poles within Santa Clarita will be shared with the CPUC and USDA Forest Service.
- A.8-10 Thank you for submitting your opinion and concerns regarding Alternative 5. They will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.