

Comment Set E.20: Applicant – Other Federal Requirements and CEQA Considerations

**ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
 SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
 E. OTHER FEDERAL REQUIREMENTS AND CEQA CONSIDERATIONS**

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	E.1.2	E-2	Forest Management	The text stating that the approximately 5-mile portion of the proposed Project along the top of Del Sur Ridge Road "would not be a safe location for firefighters to use as a holding point, nor would it be an area where aircraft could fight the fire" is misleading and not supported by the analysis provided in the Section C.7 Forest Management Activities. SCE disagrees that the ridgetop would not be a safe location for firefighters to use as a holding point and also disagrees that the reconstruction of the transmission line in this location would negate the use of aircraft to fight fire (see comments in Forest Management Activities). The taller towers would potentially necessitate aircraft flying somewhat higher, but would not preclude them from being able to fight fires in or around the ridgetop.	Reword language to incorporate SCE's comments.
2	E.1.2	E-2	Land Use and Public Recreation	The statement that the proposed Project would restrict current or future land uses on private property, and that this restriction would be considered a significant and unavoidable impact is incorrect. SCE is proposing, for the majority of the route, to replace an existing line within an existing corridor. In some locations the ROW would need to be widened - this would restrict some uses of private property such as placing structure within the ROW, but many uses would still be allowed.	

E.20-1

E.20-2

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3	E.1.2	E-3	Land Use and Public Recreation	The statement that the larger towers and expanded ROW would change the natural or scenic quality of the PCT is partially incorrect. Expanding the ROW within the ANF will not change the landscape visually, but will be a change on paper (Special Use Authorization).	Modify DEIR/DEIS to reflect this information.	E.20-3
4	E.1.3	E-4	Paragraph 4, Line 4	The text stating that grading of Forest Service roads during construction would cause permanent alterations for the road alignments is misleading. SCE maintains SCE access roads in the ANF, many of which are also ANF roads. The grading of these roads would not cause any change in alignment – the grading of spur roads to each tower location would be additions to these roads. In addition SCE has, or is in the process of surveying, all of these roads for sensitive biological and/or cultural resources. Reports on the results of these surveys have and will continue to be submitted to ANF.	Modify DEIR/DEIS to reflect this information.	E.20-4
5	E.1.3	E-4	Paragraph 4, Line 6	The statement that expansion of the ROW over residential property would preclude future use of this land is incorrect. As noted above, the expansion of the ROW would preclude certain uses of private property.	Modify DEIR/DEIS to reflect this information.	E.20-5

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
6	E.1.4.2	E-8	Paragraph 1, Line 6	<p>The statement that construction of the proposed Project would enable the interconnection of PdV and that therefore the effects of PdV are indirect effects of the proposed Project is false.</p> <p>SCE would not be proposing to build the proposed Project if it were not for the PdV Wind Energy Project and the other wind energy projects that are part of the RPS legislation. Therefore the effects of SCE's proposed Project should be considered as a result of the RPS legislation (and PdV) and not the other way around.</p>	<p>The document should be clarified to factually state that the PdV Wind Energy Project is a direct effect of the state legislated RPS requirements and that SCE's transmission project is therefore a result effect of the RPS legislation.</p>
7	E.3	E-19 through E-85	Indirect Effects of the PdV Wind Energy Project	<p>SCE would not be proposing to build the proposed Project if it were not for the PdV Wind Energy Project and the other wind energy projects that are part of the RPS legislation. Therefore the effects of SCE's proposed Project should be considered as an indirect effects of the RPS legislation (and PdV) and not the other way around.</p>	<p>The document should be clarified to factually state that the PdV Wind Energy Project is a direct effect of the state legislated RPS requirements and that SCE's transmission project is therefore a result of the RPS legislation.</p> <p>Section E.3 of the DEIR/DEIS should be removed.</p>

E.20-6

E.20-7

Response to Comment Set E.20: Applicant – Other Federal Requirements and CEQA Consideration

- E.20-1 Please see the response to Comment E.10-14 regarding mitigation requiring de-energization of transmission lines.
- E.20-2 The restriction of being unable to place a structure within the transmission easement is a long-term disruption to a residential land use which substantially limits the activities and uses that can occur on that site. No change will be made to this analysis.
- E.20-3 The use of larger towers would alter the natural and scenic quality of the foreground views from the Pacific Crest Trail. The analysis for Impact R-2 has been updated as well as the discussion in Section E.1.2 to reflect that the significant and unavoidable impacts to the PCT are related to visual resources and would result from the placement of larger towers, not from the expanded ROW.
- E.20-4 The development of new spur roads and the grading or widening of existing access roads to support heavy equipment has the potential to result in modifications to forest service roads. However, the following changes have been made in the Draft EIR/EIS to reflect the SCE comment. “In addition, grading of Forest Service roads during construction would cause permanent alterations for the road alignments in some locations.”
- E.20-5 Please see the response to Comment E.20-2 regarding the long-term disruption of residential land uses.
- E.20-6 Regardless of whether the PdV Wind Energy Project is a direct effect of the state-legislated RPS requirements or was independently proposed without the RPS requirements, the proposed Project would enable the interconnection of the PdV Wind Energy Project and so effects of PdV are indirect effects of the Antelope-Pardee 500-kV Transmission Project. No change will be made to the analysis.
- E.20-7 Please see the response to Comment E.20-6 regarding the PdV Wind Energy Project.