Comment Set A.10: County of Los Angeles, Board of Supervisors

October 3, 2006

The Honorable Michael R. Peevey
President
California Public Utilities Commission
Headquarters Office
505 Van Ness Avenue
San Francisco, CA 94110

Dear Commissioner Peevey:

We thank your commission for allowing the extension of the public review period for the draft EIR/EIS on the proposed Antelope-Pardee 500-kV Transmission Project.

We are opposed to Alternative 5 as a feasible alternate project. This alternative routes the 500-kV transmission lines around the National Forest boundary and through the unincorporated communities of Leona Valley and Agua Dulce and would increase the length of the project by 45%. It will create unacceptable significant impacts on housing, public services (fire response), and aesthetic/view corridors. The alternative may also adversely impact the entertainment industry, which shoots television and motion pictures at locations along this Alternative 5 corridor.

Enclosed is a report from County staff addressing these concerns for your consideration.
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We request that you determine that Alternative 1 is the superior project and conclude that Alternative 5 is not feasible. The under-grounding portions of Alternative 1 address the visual impacts of overhead lines, reduce fire response concerns, and minimize impacts to biological resources.

Very truly yours,

MICHAEL D. ANTONOVICH  
MAYOR

GLORIA MOLINA  
SUPERVISOR, 1ST DISTRICT

IVONNE B. BURKE  
SUPERVISOR, 2ND DISTRICT

ZEV YAROSLAVSKY  
SUPERVISOR, 3RD DISTRICT

DON KNABE  
SUPERVISOR, 4TH DISTRICT

Enclosure

C: Ms. Jody Noiron, Forest Supervisor  
Los Angeles National Forest, Office of the U.S. Forest Service  
Mr. John Boccio, EIR Project Manager  
CPUC/USDA Forest Service  
Governor Arnold Schwarzenegger
Los Angeles County
Department of Regional Planning
Planning for the Challenges Ahead

September 28, 2006

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

COMMEND ON ALTERNATIVES FOR PROPOSED CONSTRUCTION OF HIGH POWER TRANSMISSION LINES AND TOWERS BY SOUTHERN CALIFORNIA EDISON, FROM THE ANTELOPE SUBSTATION IN THE CITY OF LANCASTER TO THE PARDEE SUBSTATION IN THE CITY OF SANTA CLARITA, AND RECOMMENDATION FOR MOST FEASIBLE ALTERNATIVE

BACKGROUND

The proposed project for the construction of high power transmission lines and related towers by Southern California Edison, which are designed to transfer 500-kV (Kilovolts), is currently being reviewed under an EIR/EIS (Environmental Impact Report/Environmental Impact Statement) application. The EIR/EIS presents the proposed project and five alternatives. The proposed project, part of an overall service improvement of electricity through high power transmission lines that run from Tehachapi to Los Angeles, originates at the Antelope Substation in the City of Lancaster and traverses in a southwest alignment through 13 miles of the Angeles National Forest, terminating at the Pardee Substation in the City of Santa Clarita. The proposed project involves the replacement of existing 66-kV (Kilovolt) lines with new 500-kV transmission lines, totaling a length of 25.6 miles. Within the EIR/EIS are listed five project alternatives for the proposed project, and a final No Project/Action Alternative is also presented in which neither the proposed project nor any of its alternatives would be implemented, and the Forest Service would deny the Special Use Application. These five alternatives were originally derived from fifteen alternatives after a comprehensive screening analysis.

IT IS RECOMMENDED THAT THE BOARD REVIEW THE FOLLOWING ALTERNATIVES TO THE PROPOSED PROJECT, AND CONSIDER ALTERNATIVE ONE (1) AS THE MOST FEASIBLE:

1. Alternative One (1), calls for the partial undergrounding of the transmission lines in specific high impact segments of the proposed route. These segments would include Del Sur Ridge on National Forest System (NFS) lands within the ANF
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(Angels National Forest) for approximately four miles, and within the City of Santa Clarita for approximately 3.5 miles. Alternative One (1) takes into consideration the visual impacts of overhead lines and impacts to biological resources and Forest Management activities, such as wildland fire suppression. The route of Alternative One is nearly identical to the proposed project, with the exception of segments where the route must be diverted to place the lines below ground, and to allow the placement of associated surface structures such as transition stations.

2. Alternative Two (2) is proposed to follow a route similar to the proposed project; however, the key to this proposal is to relocate most of the towers further to the east of the proposed route and thereby eliminate visual impacts on the top of Del Sur Ridge and other key observation points. The transmission lines would be located closer to Bouquet Canyon, with the deviation from the original route proposed up to approximately 15 miles.

3. Alternative Three (3) proposes the removal of existing single circuit 500-kV towers between Haskell Canyon and the Pardee Substation, on non-NFS land, and replacing them with new single circuit 500-kV towers instead of double circuit 500-kV towers. Alternative 3 has no other changes to the proposed project.

4. Alternative Four (4) proposes the rerouting of the transmission lines and towers around the Veluzat Motion Picture Ranch and the proposed Meadow Peak residential development project near Santa Clarita. This approximate deviation of 2.75 miles is the only proposed change to the original project proposal, and is proposed for avoidance of the motion picture ranch and planned residential development.

5. Alternative Five (5) proposes a major deviation from the proposed project’s route, and would be 45 percent longer than the proposed project’s length of 25.6 miles. Originating from the Antelope Substation, Alternative Five would take the transmission power lines and towers south over the California Aqueduct and Portal Ridge mountain range, then southwest over Elizabeth Lake Road in Leona Valley. The transmission lines would then be aligned south and cross over 0.5 miles of the ANF, exit the ANF by changing alignment to the southeast, and turning south through the western portion of the Ritter Ranch Development area. At a point south of Sierra Highway and the Antelope Valley Freeway (SR-14) the transmission lines and towers would then be aligned to the west, traversing two NFS land properties in Soledad Canyon and finally entering into the existing Pardee-Vincent corridor where they will continue west to the Pardee Substation. Under this alternative, the existing single circuit 500-kV towers within the Pardee-Vincent corridor are to be replaced with double-circuit 500-kV towers. Alternative Five is designed under the auspices that no new transmission lines and towers will be constructed within the ANF because of its sensitive habitat, with the exception of the 0.5 mile segment.
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ANALYSIS AND RECOMMENDED ACTION  

After analysis by the Department of Regional Planning, the Department of Public Works, and consultation with the County Fire Department on the regulations governing the placement of structures in close proximity to high power transmission lines and towers, it is the joint contention that the proposed project as modified by Alternative One (1) should be considered as the preferred alternative.  

Although it is of major concern that any development within the boundaries of the ANF be limited, the proposed project as modified by Alternative One takes into consideration the visual impacts to Del Sur Ridge and ideally relocates segments of the proposed transmission line alignments below ground, rather than just shifting the location of the transmission lines and towers east as Alternative Two proposes.  

Alternatives Three and Four do not lend much to the preservation of the Del Sur Ridgeline within the ANF, and therefore are less desirable alternatives.  

Alternative Five is extreme in that its proposed design to avoid the ANF takes the alignment of the Transmission lines and towers through populated areas of Leona Valley, Ritter Ranch and Agua Dulce. The County should be cautious whenever transmission lines are proposed to pass through such rural communities. Also, Agua Dulce Airpark is located within approximately 1 mile from the transmission lines and towers and the project will require Federal Aviation Administration approval of this route. The Fire Department’s Fire Prevention Manual, under Regulation No. 27, prohibits any dwellings within 50 feet of the drip line of any transmission line, and also requires the establishment of a 100 foot easement parallel to the direction of the transmission lines. Such safety requirements by the Fire Department make Alternative Five an infeasible alternative and is not recommended for implementation.  

Respectfully submitted,  

DEPARTMENT OF REGIONAL PLANNING  

Bruce W. McClendon, FAICP  
Director of Planning  

BMC:JS:FM:DK:rs  

C: Chief Administrative Officer  
County Counsel  
Executive Officer, Board of Supervisors  
Director, Department of Public Works  

Board Letter—09/28/06
Response to Comment Set A.10: County of Los Angeles, Board of Supervisors

A.10-1 Thank you for submitting your opinions and comments on Alternative 5. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.

A.10-2 Thank you for submitting your opinion regarding Alternative 1. See also General Response GR-6 regarding underground construction.

A.10-3 Thank you for submitting your recommendations regarding the various alternatives to the proposed Project. These will be shared with the decision-makers who are reviewing the Project and alternatives at the USDA Forest Service and the CPUC.