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Department of
Agriculture

Forest
Service

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Date: September 15, 2005

Ken Lewis
Supervisor for CEQA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

**CERTIFIED MAIL – RETURN
RECEIPT REQUESTED
NUMBER: 7004 2510 0005 3189 6135**

Dear Mr. Lewis:

We've been working with John Boccio, of your staff, on the Southern California Edison Antelope-Pardee Transmission Project that involves a portion of National Forest System lands managed by the Angeles National Forest. The proposed action (project) includes: the removal of the existing Saugus-Del Sur 66-kV transmission line and replacing it with a 500-kV line, upgrading SCE's Antelope and Pardee Substations, and rerouting sections of the existing right-of-way. Southern California Edison submitted a Special Use Application to the Forest for the portion of this project located on National Forest land.

The Forest entered into a Memorandum of Understanding with the CPUC in May 2005 to move forward on a joint National Environmental Policy Act (NEPA)/CEQA Environmental Impact Statement/Report (EIS/R). When the Forest entered into the agreement I fully intended to attempt to meet the Final EIS/R publication date of March 2006, knowing this was a very ambitious timeline for the NEPA process. As we moved further into the analysis I have become more aware of the challenges of meeting this timeframe and want to formally inform you that I am concerned that attempting to meet this timeframe may compromise our ability to complete a thorough analysis that complies with NEPA and the Forest Land and Resource Management Plan.

My understanding is this project is also known as the Antelope Transmission Project, Segment 1. There are CPUC applications from Southern California Edison (SCE) for three segments of the Antelope Transmission Project that are being processed, or will soon be processed, through your office. I also understand there could be 8 segments needed to fully develop the Tehachapi Windfarm Project and your office is looking at developing a programmatic EIR to review all the segments in the very near future. Segment 1 has been separated from this programmatic EIR and is being analyzed first because there is a proposal to construct a 201-MW (megawatt) windfarm 8.5 miles northwest of SCE's Antelope Substation. This windfarm project, known as the Fairmont Wind Project, is planned to be on-line in 2007 and would require a 220-kV line from Antelope Substation to transfer this power into SCE's electric system. I understand there is no application on file for the Fairmont Wind Project with Los Angeles County (assuming this is the agency with jurisdiction for approval) and very little detail is available to the Forest about the project.



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Based on the Draft Purpose and Need for the Antelope-Pardee Transmission Project it appears the Fairmont Wind Project is connected to this Antelope-Pardee Transmission Project and must be considered a connected action in compliance with NEPA (40 CFR 1508.25(a)). This would include ancillary improvements, including the powerline from the windfarm to Antelope Substation. To move further with the analysis, we will need additional information regarding the Fairmont Wind Project, both to substantiate the need for the upgrade of the existing 66-kV line and to inform our effects analysis in the EIS/R.

In addition, constructing the line for 500-kV, instead of 220-kV (which is the sized line SCE feels would be required to bring the power from the proposed Fairmont Wind Project into SCE electric system) brings up the concern of connecting this project with the larger Tehachapi Windfarm Project. In order to determine whether this larger Tehachapi Windfarm Project is connected to the Antelope-Pardee Transmission Project, the Forest needs additional information on how the Antelope-Pardee Transmission Project and the Tehachapi Windfarm Project are inter-dependent. Presently this inter-dependence is not clear and this will need to be resolved before the proposed action (project) can be finalized.

According to past court decisions on NEPA documents, if a project includes multiple phases with independent state and federal jurisdiction, the federal agency can rely on the state's environmental analysis. Unfortunately, in this case, my understanding is there has been no CEQA completed on the Fairmont or Tehachapi Windfarm Projects. I believe at a minimum our analysis and EIR/S must address these projects in the context of indirect and cumulative effects associated with the Antelope Transmission Project.

I am also concerned about compliance with the new Forest Land and Resource Management Plan (Forest Plan). This Forest Plan will be approved the end of this month. From my understanding, at a minimum, the proposed action (project) does not meet the scenic/visual requirements in the Plan and mitigation will be required. The mitigation could cause additional resource damage and there is still the possibility the mitigation will not ensure compliance with the Forest Plan (a full analysis must be performed before this determination can be made). It is critical to ensure the proposed action (project) and any alternatives on National Forest System lands comply with the guidance and direction provided in the Forest Plan. Please understand, with the rapid urban growth surrounding the Forest, there is and will continue to be a large demand to build infrastructures on National Forest land. At the same time, there is a high demand to retain the Forest character and values for present and future generations. My intention is to try to meet the infrastructure needs, when necessary, while retaining the integrity of the Forest without eroding, project by project, the integrity of the Forest.

Presently, I understand there are three alternative routes on the Forest: the proposed action, mid-slope paralleling the proposed action route, and rerouting the line where it would end at the Vincent Substation instead of the Pardee Substation. Only one of these alternatives has the necessary resource surveys completed. The surveys on these other two routes will need to be

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completed and the information from the surveys incorporated into the analysis and EIS/R. We do not require survey work be completed on non-National Forest System land (including those alternatives proposed off the Forest), though we do require good faith efforts to determine environmental impacts of each alternative. With the number of alternatives being considered, this will require time to complete the analysis.

I want to ensure you understand our National policy. Should it be determined in the analysis that there are routes off National Forest land that can meet the purpose and need, have less environmental, social, and economic effects, and can be reasonably accommodated on non-National Forest land, our direction is to deny the request. This direction is echoed in the Forest Plan.

In summary, I have given and will continue to give much thought and consideration to this project. There are many unanswered questions and concerns that will take some time to resolve and this is why I am concerned about meeting the proposed timeframe. Please forward the following information to Forest project leader Marian Kadota (c/o Forest Service, 6755 Hollister Avenue, Suite 150, Goleta, CA 93117):

- Detailed information about the proposed Fairmont Windfarm Project that will be used to substantiate the need for the upgrade and inform the effects analysis in the Antelope-Pardee Transmission Project EIS/R.
- Information to make a determination of whether the Tehachapi Windfarm Project and the Antelope-Pardee Transmission Project are connected actions.

If you have any specific questions, I suggest you direct them to Marian by calling (805) 961-5732. If you would like to discuss my concerns in general terms, please feel free to call me at the phone number noted on the letterhead. I appreciate your time and consideration.

Sincerely,



JODY NOIRON
Forest Supervisor

cc: Marian Kadota, Sarah Birkeland, Cid H Morgan