## Comment Set C20

# RECEIVED JAN 15 

EDWARD H. LEONHARDT, P.E.

> | 4837 Mission Hills Dr. |
| :--- |
| Banning, CA 92220 |
| $951-845-6403$ |
| ehlsml2@msn.com |

Juralynne B. Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301
RE: Comments to Draft Environmental Impact Report
El Casco System Project
To: El Casco EIR Team
My name is Edward H. Leonhardt. I live at 4837 Mission Hills Drive, Banning, California. My home is located adjacent to the Southern California Edison (Edison) Proposed Project through Sun Lakes. I am a formal Party to Proceeding A07-02-022 and the author of the formal protest to Edison's Proposed Project. The primary objective of my protest was to assure that the California Public Utilities Commission (CPUC) would prepare an Environmental Impact Report (EIR) for the Edison application in accordance with state law, the California Environmental Quality Act (CEQA). It was my belief that the Environmental Impact Report would indicate that based on the impacts to the environment; Edison would be required to bury the proposed new lines below ground level. It was also the desire of 862 Sun Lakes' residents who signed the protest that the new lines sould be buried beneath ground level (signature pages attached).

I wish to thank the Commission for the opportunity to participate in their process of regulating the investor-owned electric power industry. It is through the Commission's regulatory process that we the public and the environment are protected as required by CEQA.

Simply speaking, CEQA requires that an electric utility's application be analyzed for:
(1) Establishment of alternatives to the proposed project;
(2) Impacts to the environment by the proposed project and the alternatives;
(3) Comparison of the proposed project to the alternatives; and
(4) Designation of the Environmentally Superior Alternative.

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I was very happy to read in the Draft Environmental Impact Report for the El Casco System Project, that the conclusion was;
Therefore, the Environmentally Superior Alternative would be the Partial Underground Alternative.

It is now up to the Commission to complete the CEQA Process and the Commission's General Proceedings Process. It is my fervent request that the Commission's Final Decision will be to direct Edison to implement the Partial Underground Alternative for the El Casco System Project.

Following attendance at the Informational Workshops and Public Participation Meetings held on January 9, 2008, I have several comments on the Draft EIR that I am submitting for inclusion in the Final EIR. My comments are as follows:

1. Following receipt and review of the Draft EIR, I request a clarification by E-mail relating to the statement in the Executive Summary, Page ES-3, Paragraph 2; that "The Environmentally Superior Alternative would be the Proposed Project." I was advised by the El Casco EIR Team, through E-mail and in the January 9 Workshop, that this was a typographical error and will be revised in the Final EIR to indicate that the Partial Underground Alternative is the Environmentally Superior Alternative.

As indicated in the Draft EIR Team presentation prior to Public Participation, the CEQA process requires that an Environmentally Superior Alternative be designated based on the analysis conducted in the preparation of the Draft EIR. It was concluded in Section E. Comparison of Alternatives; that "the Environmentally Superior Alternative would be the Partial Underground Alternative. The decision was based upon the facts that the Partial Underground Alternative is preferred over the Proposed Project in three issue areas; land use, noise and visual.
2. I understand that the CEQA issues covered in the Draft EIR do not consider EMF impact. However, the CPUC does consider EMF as an important regulatory aspect for potential impact to the public and has included the subject in the Draft EIR. Pages D.7-

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44 and D.7-45 provide information that is vital in comparing the EMF issue of the Proposed Project to the Partial Underground Alternative.

As stated in the Draft EIR, "Most recently the International Agency of Research on Cancer (IARC) and the California Department of Health Services (DHS) both classified EMF as a possible carcinogen. This does not mean that EMF is a potential public health risk. What it does mean, is that: (1) if the public experiences exposure to EMF; (2) if the public is close enough to the EMF source; and (3) if the duration of EMF exposure is for a long time; the result to the public could be a cancerous health risk.

The Draft EIR indicates that the existing conditions at the edges of the ROW are zero. The Proposed Project (aboveground) indicates that the EMF at the edges of the ROW is 5.7 and 5.5 milliGauss. For the Partial Underground Alternative, the EMF at the ROW edges are 0 and 0.2 milliGauss. When the El Casco System Project is implemented, the potential EMF exposure to the people along the ROW will be 100 percent of the time. Therefore, it is vital that the preferred option related to the EMF issue be implemented. Just as in the CEQA issues related to land use, noise and visual, the preferred alternative is again the Partial Underground Alternative.
3. During the January 9 Workshop, a discussion of the construction of the Partial Underground Alternative occurred between the Draft EIR Team and the Public. In particular, the Public questioned the Duck Bank cross-section as shown on Figure Ap6, where the final level of the new finished grade of the underground transmission trench was indicated to be approximately four feet above the existing grade. The Draft EIR Team Leader indicated that this was not correct and that the finished grade of the Partial Underground Alternative would be completed to the existing grade and would be completed to the current golf course grades and conditions. Please incorporate these conditions into the Final EIR.
4. Also associated with the Partial Underground Alternative construction, I request that

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the Sun Lakes property boundaries so that all residents can experience the preferred

## C20-4

issues related to land use, noise and visual benefits of the Partial Underground Alternative. I request that the two riser poles on the east side of the Sun Lakes property be placed within the $1000+$ feet east of Sun Lakes' east fence line and S. Highland Home Road. I also request that the two riser poles on the west side of the Sun Lakes property be placed within the 60 feet west of Sun Lakes' west fence line and Highland Springs Avenue. Please incorporate these conditions into the Final EIR.

I would like to close my Draft EIR comments with the same quote by Margaret Mead that I closed my protest document with which was obtained from the CPUC website.
"Never doubt that a small group of thoughtful, committed citizens can change the world.
In fact, it's the only thing that ever has."

Thank you.
Sincerely,


Edward H. Leonhardt, P.E., R.E.A. II

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As residents of Sun Lakes retirement community, located in the City of Banning, California, we are signing this protest against the El Casco System Project (Project), a project proposed by Southern California Edison (SCE), California Public Utilities Commission (CPUC) Application No. A07-02-022. We contend that the Proponent's Environmental Assessment prepared by SCE does not mitigate the potential environmental impacts, ie., to result in final conditions becoming less severe or intense than current ones. We request that the CPUC require that an Environmental Impact Report (EIR) be prepared for the portion of the Project where 13 miles of existing singlecircuit 115 kV lines (three lines) are replaced with new, higher capacity double-circuit 115 kV lines (six larger lines) and taller poles. We believe that the results of the EIR will require SCE to bury the proposed new lines beneath ground level.


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