

Comment Set A8



City of Banning Office of the Mayor

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August 4, 2008

Juralynne B. Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301
E-mail: elcasco@aspeneg.com

RE: Southern California Edison's El Casco Substation Project

Dear Ms. Mosley

The City of Banning City Council has received the Recirculated Draft Environmental Impact Report as well as, been notified of, and attended the Southern California Edison (SCE) Public Meetings regarding the El Casco Substation Project. We appreciate the information SCE has provided and look forward to working cooperatively toward the end goal of providing reliable power to this rapidly growing area. This letter is to share our comments and concerns regarding, specifically, the one mile portion that traverses the Sun Lakes Country Club community within the City of Banning.

Approximately seven miles of the 115kV transmission line is located in an SCE right-of-way within the city limits of Banning. One mile of the existing 115kV line traverses a rather large 55+ community known as Sun Lakes Country Club. The Sun Lakes Development has 3300 homes with 2 golf courses and full amenities for all residents. The 115kV transmission line right-of-way is largely located within the golf course boundaries and is very close to many homes that border the golf course. All utilities, with the exception of the SCE 115kV transmission line are currently located underground.

The Draft EIR released in December 2007 supports the undergrounding of this one mile section as the preferred alternative. However, the Recirculated Draft EIR released in July 2008, which was prepared by the CPUC rather than Aspen Environmental Group, has redirected the undergrounding to no longer be the preferred alternative. The Recirculated Draft has changed important items such as Land Use, Noise, and Visual Impacts to no longer be the preferred alternatives if the lines were undergrounded. We are curious as to how this change came to be? And why the CPUC prepared this document rather than the authors of the original Draft EIR, Aspen Environmental Group?

A8-1

A8-2

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Comment Set A8, continued

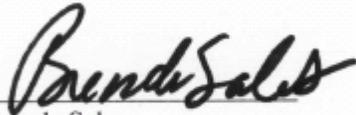
We understand that cost, and time of construction across the golf course are obstacles. Yes, it will take longer to construct the underground facilities across the golf course and yes, it will be more expensive, these are not good enough reasons and should not outweigh the long term benefits to a community of approximately 6000 citizens. The community realizes many other benefits by these lines being undergrounded such as: long term aesthetics, reduced exposure to EMF, elimination of very loud noise on frequently foggy mornings, improved safety by eliminating the overhead poles located on the golf course, and significantly reducing the potential for fire. We agree with the residents of Sun Lakes and believe strongly that the long term benefits of undergrounding this section of line far outweigh the inconvenience of the time to traverse the one mile across Sun Lakes.

A8-3

The City of Banning respectfully requests that the CPUC do two things: 1) insure the CEQA process is adequately and properly followed through to the completion of all requirements and; 2) that the CPUC reconsider and change the Final EIR to reflect undergrounding the one mile of 115kV transmission line through the Sun Lakes Country Club Community in the City of Banning as the preferred alternative.

A8-4

Respectfully,



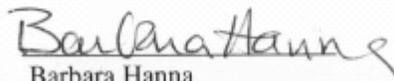
Brenda Salas
Mayor



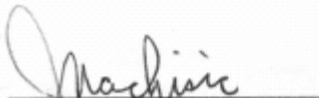
Debbie Franklin
Mayor Pro Tem



Bob Botts
Councilmember



Barbara Hanna
Councilmember



John Machisic
Councilmember

Responses to Comment Set A8 – City of Banning

A8-1 Please refer to General Response GR-1 for a detailed explanation of the change to the Environmentally Superior Alternative. Please refer to Response to Comment A8-2 for a discussion of EIR preparers.

A8-2 Like the original Draft and Final EIR, the Recirculated Draft EIR was prepared by Aspen Environmental Group pursuant to Public Resources Code §21082.1(a) and CEQA Guidelines §15084(d). All iterations of the EIR have been independently reviewed and analyzed by the CPUC and reflect the CPUC's independent judgment. (See Pub. Res. Code §21082.1(c)(1), (2); CEQA Guidelines §15084(e).) Where, as here, the revisions to the original EIR are limited to a few chapters or portions of the EIR, only those sections that have been modified must be recirculated per CEQA Guidelines §15088.5(c). Originally published Draft EIR Section K (List of Preparers) identified all individuals and their associated firm who prepared all Draft and Final EIR documents. As no changes to this section occurred as a result of the new information provided to CPUC, it was not included in the Recirculated Draft EIR.

Please refer to General Response GR-1 for a detailed explanation of how the additional new noise information resulted in a change to the Environmentally Superior Alternative.

A8-3 Comment noted. Please refer to General Response GR-1 for a detailed explanation of the change to the Environmentally Superior Alternative.

As discussed in detail in originally published Draft EIR Section D.7 (Hazards and Hazardous Materials), and Appendix 5 (Electric and Magnetic Fields – Field Management Reports), which includes the EMF field management reports specific to the Proposed Project and alternatives, the Partial Underground Alternative would result in the lowest EMF levels. This information will be used by the CPUC decisionmakers in determining approval of the proposed Project or an alternative.

With regard to noise impacts, please refer to General Response GR-1 for a detailed explanation of how the additional new noise information resulted in a change to the originally published DEIR noise analysis, resulting in a less than significant noise impact. Furthermore, as discussed in Recirculated Draft EIR Section D.9 (Noise), recent information provided by SCE shows that the Proposed Project would result in a decrease in corona discharge noise over corona noise generated by the existing 115 kV subtransmission line.

With regard to hazard impacts within the Golf Course, as discussed in originally published Draft EIR Section D.7 (Hazards and Hazardous Materials), Impact HAZ-8, the Proposed Project would result in replacing the existing wood poles with steel poles. Therefore, implementation of the Proposed Project would reduce the potential for structure failure as a result of a fire or other hazard since steel is considerably more resistant to accident than wood. Therefore, the risk of hazard within the Golf Course as a result of the Proposed Project would be reduced and is thus considered to be a less than significant impact.

With regard to potential fire impacts, as discussed in originally published Draft EIR Section D.7 (Hazards and Hazardous Materials), Impact HAZ-8, the Fire Management Plan required by APM HAZ-1 for the construction and operation phases for the sections of the subtransmission line routes classified with a high risk for wildfires would reduce the likelihood of the ignition and spread of a fire to a less than significant level.

A8-4 The legal requirements for recirculation under CEQA are provided in Recirculated Draft EIR Section A.1 (Legal Authority), followed by a discussion of the specific reasons for recirculating the Draft EIR for the Proposed Project in Section A.2 (Summary of Revisions Made to Previously Circulated EIR). Please refer to General Response GR-1 for a detailed explanation of the change to the Environmentally Superior Alternative identified in the originally published Draft EIR.

Your support for the Partial Underground Alternative has been noted and will be considered by the CPUC decisionmakers.