

**Comment Set B.4: Jackson-DeMarco-Tidus-Peckenpaugh Law Corporation,
representing Leona Valley residents and the Leona Valley Town Council**

Jackson | DeMarco | Tidus
Peckenpaugh
A L A W C O R P O R A T I O N

September 7, 2006

Direct Dial: 949.851.7492
Email: ataber@jdtplaw.com
Reply to: Irvine Office
File No. 00195

VIA FACSIMILE AND U.S. MAIL

Ms. Marian Kadota
NEPA Project Manager
USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California 91301

**Re: Request for an Extension of Time for the Antelope-Pardee 500 kV
Transmission Project Draft EIR/EIS**

Dear Ms. Kadota:

We represent the following residents of Leona Valley: being Marcy Watton, David Gantenbein, Alexis Upton-Knittle, Lloyd J. Cook, Melinda Janowitz, Richard and Guyla Clayton, Ralph Ciamarella, Bernhard and Laurie Staschik, Christina and Matthew Fitzgerald, Dale L. Baer, and Warwick and Karen Bryon (“Leona Valley Residents”), and the Leona Valley Town Council. The Leona Valley Residents and Leona Valley Town Council respectfully request an extension of time to review and comment on the Draft Environmental Impact Report/Environmental Impact Statement (“Draft EIR/EIS”) on the Application of Southern California Edison Company (U-338-E) for a Certificate of Public Convenience and Necessity Concerning the Antelope-Pardee 500 kV (Segment 1) Transmission Project (“SCE Transmission Project”). The Leona Valley Residents and Leona Valley Town Council have made this same request to the California Public Utilities Commission (“CPUC”).

As you are aware, the Draft EIR/EIS includes an Alternative, No. 5, that proposes the SCE Transmission Project cross through the Leona Valley community. Residents of Leona

B.4-1

Irvine Office
2030 Main Street, Suite 1200
Irvine, California 92614
t 949.752.8585 f 949.752.0597

Westlake Village Office
2815 Townsgate Road, Suite 200
Westlake Village, California 91361
t 805.230.0023 f 805.230.0087

www.jdtplaw.com

Ms. Marian Kadota
September 7, 2006
Page 2

Valley are directly impacted by Alternative No. 5, including, for example, the location of 500-kV transmission towers adjacent to homes and the associated impacts, and even the potential condemnation of homes. In addition, Alternative 5, for example, impacts the community's economic well being and education opportunities for the community's youth, and disrupts the entire community's quality of life. As such, the Leona Valley Residents and Leona Valley Town Council requesting this extension have a significant interest in the SCE Transmission Project.

B.4-1
cont.

B.4-2

Public involvement is an important aspect of the National Environmental Policy Act ("NEPA") process and in fact, federal agencies must make diligent efforts to involve the public. (40 C.F.R. § 1506.6.) Unfortunately, not all of the impacted residents, nor did the Leona Valley Town Council, received a copy of the July 21, 2006, notice of "Public Meetings-Release of Draft EIR/EIS." It was not until August that the Town Council received any notice of the proposed SCE Transmission Project. More particularly, it was not until the August 28, 2006, "information meeting" that residents really became fully aware of the scope of, and potential impacts associated with, Alternative 5. This request for an extension of time is necessary to allow sufficient time for the public to understand and comment on the potential significant environmental effects of the proposed project and in particular, Alternative 5.

B.4-3

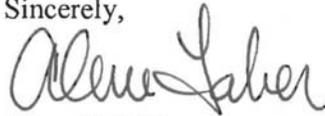
Given the voluminous documentation (the Draft EIR/EIS is estimated to be over 1000 pages) and technical complexity of the Draft EIR/EIS, it is not possible for the Leona Valley Residents and Leona Valley Town Council to fully evaluate the scope of Alternative 5 and its potential for significant impacts by the September 16, 2006, deadline for submission of comments. Therefore, the Leona Valley Residents and Leona Valley Town Council respectfully request a 45-day extension of time. There is no prejudice to any of the parties in allowing additional time for those impacted by the SCE Transmission Project to evaluate the scope of the impacts and communicate their concerns to the CPUC and Forest Service before these agencies make a decision on the significant Project.

Ms. Marian Kadota
September 7, 2006
Page 3

We appreciate your consideration of this request. Please contact me at the number above
as soon as possible to let me know of the Forest Service's decision regarding our request.

B.4-4

Sincerely,



Alene M. Taber

Response to Comment Set B.4: Jackson-DeMarco-Tidus-Peckenpaugh Law Corporation, representing Leona Valley residents and the Leona Valley Town Council

- B.4-1 A discussion of residential land use impacts as a result of Alternative 5 is included in Section C.9.10.2 of the Draft EIR/EIS.
- B.4-2 As described in the response to Comment C.9-7, it is not anticipated that Alternative 5 would result in the displacement of a significant portion of the families in the Leona Valley or Agua Dulce communities, nor would it necessitate the closure of local schools. Please also see General Response GR-1 regarding the effects of the Project and alternatives on property values.
- B.4-3 Please see General Response GR-5 regarding noticing procedures and the Draft EIR/EIS review period.
- B.4-4 On September 13, the CPUC and the USDA Forest Service formally extended the public review period for the Draft EIR/EIS to October 3, 2006. A notice of the extension for the Draft EIR/EIS public comment period was mailed to the following address on September 14, 2006:
- Alene M. Taber
Jackson, DeMarco, Tidus, Peckenpaugh
2030 Main Street, Suite 1200
Irvine, CA 92614