

NCWP Letterhead

December 1, 2009

Mr. S. David Freeman, General Manager
Los Angeles Department of Water and Power
111 N. Hope Street
Los Angeles, CA 90012

Re: Scattergood Line 1 High Voltage Project

Dear Mr. Freeman,

We support, in concept, construction of a second 230KV high voltage line from the Scattergood Power Generation Station through our neighborhood council area to the Olympic area substation to improve electrical service reliability. We appreciate and acknowledge the LADWP desire to address an infrastructure issue before it becomes critical.

LADWP announced to our NC Board an aggressive implementation schedule. **We are concerned about lack of notice and inadequate time to comment.** We only recently learned about this project at our October 6, 2009 Board meeting even though the project was in development for over a year. This fails to comply with the LADWP-NC MOU process established; community input was neglected. At a community briefing held the very next evening LADWP personnel noted that a Mitigated Negative Declaration was released and that the comment period was to expire in about 10 days!

The LADWP project team is friendly and approachable. They have met with us several times since project revelation in October. These LADWP project personnel have told us that they are not obliged to respond to our Mitigated Negative Declaration (MND) comments but will do so before LADWP Board approval is sought. After approximately two months of interchange with a joint ad hoc committee of the impacted NCs **information about the unresolved routing, health impact and traffic issues remains elusive.** We are grateful Councilmember Bill Rosendahl interceded to postpone the November comment deadline and that your department agreed to delay DWP Board actions until at least January 15 to foster resolution. **We remain concerned, however, that the people attending our meetings are not empowered to make the programmatic changes we desire! Please resolve this.**

We call upon you to commitment DWP to prepare a project Environmental Impact Report (a more comprehensive review). Because impact information remains elusive, the EIR is needed to gather and address such information. Risks associated with the power line possibly causing fire, spark and/or explosion potential due to proximity to existing oil pipelines and gas lines and the risks associated with ground movement are not addressed in the MND.

LADWP project changes to the proposed street routing, especially under small, residential streets is imperative to alleviate our most serious concern. To date no LADWP commitments or consideration has been made for any project design. **We strongly oppose the project as**

delineated without these issues being satisfactorily addressed.

We call upon you to commitment LADWP to prepare an Environmental Impact Report and to make the community friendly changes to the routing we have been discussing with LADWP.

Our primary concerns can be grouped into two areas:

1. **Project EMF (Electromagnetic field) health impacts arising from line routing along community streets in close proximity to residences.** DWP stated that although EMF exposure standards are addressed in Europe and minimum power line setback from schools is enforced by LAUSD, LADWP has not established standards. We seek, at a minimum, the LAUSD setback requirements for all areas subjecting people to extended exposure. We have been promised detail information about the actual field strengths associated with this project and similar projects in Los Angeles, but it has not been provided yet and health concerns remain unresolved. **These have long term potential and resolution of this is most important to us.**
2. **Project local traffic impacts.** Several major portions of this project were planned based on construction convenience rather than traffic impact. Less than adequate impact assumptions were made, and routing choices were highly restricted to foster project administrative convenience and reduction of jurisdictional interaction. We understand that there will be roadway cosmetic impacts as LADWP will pave over the trench created rather than leaving streets in pristine condition.

Examples of common positions among the all communities in our LADWP discussions include:

1. Alternative routes must avoid residential areas. We have presented suggestions to LADWP. We await route selection criteria and commitments from LADWP to change the existing routes. We support routing lines on Pershing and/or Westchester Parkway which was avoided in the current project.
2. The community understands the desire to complete this task rapidly. LADWP personnel told us that they intend to seek a waiver from City restrictions prohibiting rush hour work. We have suggested night-time activity. LADWP has made not commitment.
3. The community has jointly assembled a list of impact questions. We await DWP response and commitments to mitigate impacts via project design and routing changes.
4. One off-shoot to this project is possible development of redundant power inputs for LAX which presently relies solely on power from the Westchester substation.

Without responsive changes to the proposed design, we feel that this project creates an unacceptable health risk to our community. Please provide assurance before December 21, 2009 that you intend preparation of an EIR and will make project design changes necessary to create a community friendly venture.

Sincerely,

Cyndi Hench, President