

LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

April 2, 2012

Ms. Doreen Farr, Chair
Santa Barbara County Board of Supervisors
105 E. Anapamu Street
Santa Barbara, California 93101

By email

RE: Item # A-11, Emergency Permit 12EMP-00000-00002

Dear Chair Farr and Honorable Members of the Board of Supervisors:

This office represents William Kerstetter, a resident of the Carpinteria community of Shepherd Mesa. Mr. Kerstetter is significantly and adversely affected by the Southern California Edison (SCE) practice of seeking emergency permits for expanded utility infrastructure that is required by the Local Coastal Plan to be placed underground.

The project area has been subject to a number of SCE projects since about 2004, some undertaken without permits and subject to NOVs, some initially sought under a 2009 emergency permit application that was withdrawn, and a newly expanded project to expand two separate transmission lines that is pending before the Public Utilities Commission. SCE's work in the project area began in 2004 without permits, and today, there has been no comprehensive environmental review of any of these projects.

This portion of the Carpinteria Valley is highly scenic and is in the Coastal Zone. As such, it is subject to LCP policy and CZO requirements mandating undergrounding of transmission lines and compatibility of any above-ground facilities with the surroundings.

12EMP-0000-00002 was issued without policy consistency or compatibility findings. Like the case in 2009, there is no independent evidence that an emergency exists, yet the permit was issued without public comment. The project increased the visual impact of overhead wires and its cumulative impact must be assessed in conjunction with the 2004 unpermitted pole and conductor replacements and the impending PUC 66 kv transmission line expansions that traverse the same area and contribute to additive environmental impacts.

We ask your Board to direct staff to require SCE to demonstrate the existence of a bona fide emergency, to cure all outstanding violations, and take no further emergency actions until all permitting of SCE facilities is complete. SCE has been dallying for nearly a decade with this and related projects, avoiding CEQA and community input and causing significant impacts.



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