

Subject: Response to PSEC Project NOP
Date: Wednesday, March 26, 2008 11:05 PM
From: Jim Reardon <jimr@cdvinc.com>
To: EIR@co.riverside.ca.us
Cc: district1@rcbos.org

County of Riverside
Department of Facilities Management
P.O. Box 789
Riverside, CA 92502-0789

March 26, 2008

cc: Bob Buster, 1st District, Riverside County Board of Supervisors

Re: Response to PSEC Project NOP

I would like to take this opportunity to comment on the above-captioned notice. I am a resident of the remote community of Rancho Carrillo, located at the extreme western edge of Riverside County. Rancho Carrillo has been designated as a proposed antenna site for the PSEC project.

On behalf of our community, the Rancho Carrillo Homeowners Association has already expressed the community position in opposition to placement of an antenna within our community. I agree with this position.

On behalf of my own family, I would like to separately express opposition to County intentions expressed in the NOP. Here is the basis for our opposition:

1. Economic. While not strictly a CEQA question, I am opposed to placement of PSEC facilities in our area because the proposed locations for these facilities will not serve our community. Rancho Carrillo is the only populated area in the extreme western portion of the county, and our population is small. In this community, there are about 60 occupied homes within a 160 acre area known as Verdugo Potrero. The community is surrounded by the San Mateo Canyon National Wilderness Area, preventing further development. Thus, an expensive long-range facility in this area makes **no economic sense**.

2. Ineffective. Again, while not strictly a CEQA question, radio propagation

maps provided to our community by members of the PSEC project team clearly illustrate that the project will provide no meaningful improvement to radio communication for our volunteer fire department in the area of their principal need — along the access road (located in Orange County) that accesses our community. Furthermore, representatives of the PSEC project team could not offer that any improvement in communications with Orange County Fire Authority, California Highway Patrol, and Orange County Sheriff's Department (all of whom presently respond to incidents in our community). Thus, we believe the system to be **ineffective** and thus it does not warrant consideration for accommodation in our community.

3. Aesthetic. Rancho Carrillo is a unique rural community that was formed in 1962. Even after electrical power was brought to the community in 1992, residents have sought to preserve the rural character of the area by locating utility services underground at considerable expense and foregoing suburban amenities such as street lighting. We have sought to keep the community and our personal property compatible with the wilderness surroundings. The proposed PSEC antenna facility, 100 to 140 feet in height, is **incompatible with this aesthetic**. Furthermore, no mitigation of this incompatibility is possible with a structure of this height, regardless of its location within our community.

4. Land Use and Planning. A radio communication tower of the type proposed is incompatible with property zoning restrictions in our community. In addition, it is specifically incompatible with the CC&R's that govern properties within Rancho Carrillo. Furthermore, county access to any tower located in our near Rancho Carrillo that relies on passage over the roads in our community will necessarily be across private property and will require easements or use permits be obtained from all affected property owners, including me. I am not inclined to grant the county such an easement or permit for the reasons outlined in this letter. Easements and/or permits may also be required from the County of Orange, Rancho Mission Viejo and the United States Forest Service to gain non-emergency access to this area via existing roads.

Summary

I believe that County and Federal resources are being wasted in an effort to locate an antenna within the area of Rancho Carrillo. In taking what may

appear to be the path of least resistance in selecting proposed antenna sites, the performance of the resulting system is marginalized. Radio propagation into the surrounding canyon areas of Riverside County is not significantly improved over that which is directly available from existing facilities on Santiago Peak. Essential interoperability with the incompatible systems in Orange County is not achieved.

As a practical matter, Riverside County does not today provide emergency services to Rancho Carrillo. The nearest Sheriff substation is located in Murrietta, some 40 miles away by road. The closest fire department is located in Lake Elsinore, also about 40 miles distant. Riverside County emergency telephone numbers are not even reachable from our community, since Rancho Carrillo is located in the 949 telephone area code. All direct calls are rejected! In contrast, Orange County Sheriff, Fire and California Highway Patrol are all dispatched from stations in San Juan Capistrano, which is a mere 14 miles distant, and new development in the Mission Viejo Ranch will cut these distances by half within a decade.

If I dial 911 from my home in Rancho Carrillo, the call goes to an Orange County agency for response. Installation of the proposed antenna will not change this situation.

The **aesthetic damage** that would be done by installation of PSEC at any of the proposed locations, or within the surrounding Forest or Wilderness lands would be considerable. Such a facility would be visible from a great distance and destroy the natural area that the 1984 Wilderness Act sought to create when the San Mateo Canyon National Wilderness was created. While CEQA is not directly applicable to projects on Federal lands within California, the protections afforded in the Federal setting must be applied in consideration of projects located in so-called "included areas" such as the Rancho Carrillo community. In essence, what is appropriate on private or non-Wilderness USFS land surrounded by the Wilderness is no different than what would be appropriate in the Wilderness itself — especially considering the height of the project being proposed.

Thus, requirements of the National Environmental Protection Act (NEPA) are applicable to any project located in this area because of proximity to the Federal and Wilderness lands. Mere placement of a 100 to 140 foot tower on private land in Rancho Carrillo is insufficient to mitigate the **aesthetic**

damage that would result to my property, the community of Rancho Carrillo, and to the surrounding National Wilderness.

Representatives of the Rancho Carrillo community offered county PSEC project representatives the opportunity to discuss installation of a scaled-down facility that would be capable of being hidden on an existing structure at a location that would serve the locally populated area (which can never be geographically expanded due to our surroundings). This alternative should be given serious consideration in the proposed EIR and not be further ignored.

Sincerely,

James M. Reardon
11081 Fox Springs Road (Lot 39)
Rancho Carrillo

Mail:

P. O. Box 550
San Juan Capistrano, CA 92693-0550

Telephone:
(949) 728-0558 in Rancho Carrillo
(949) 633-0834 mobile