

Comment Set 1
Dalour Younan

05/10/2004

To: California Public Utilities Commission (CPUC)

Ref: Proposed Miguel-Mission 230 Kv #2 Project

From: Dalour Younan

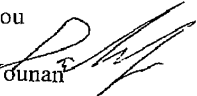
Address: 2440 Wind River Road
El Cajon, CA. 92019

Telephone: 619-588-4517\

I attended the CPUC hearing on the draft EIR on today's date at 4PM in Santee, CA. I have earlier voiced my concerns about the project's impact on my property. Namely, the increase of EMF, noise pollution and usage of easement adjacent to my house.

At today's meeting, I spoke to Tom Murphy and David Shafer of Aspen group. Mr. Murphy explained the underground alternative plan near my house at Willow Glen and Mr. Shafer explained the potential impact of the alternative plan on my property. Mr. Shafer stated that the alternate plan would lower EMF emission but increase noise pollution unless certain type of equipment was placed on the power towers near my house. I am still unsure as to how this plan would impact the easement. My hope is that my outstanding concerns are addressed prior to final approval of the project.

Thank You

Dalour Younan 

1-1

Responses to Comment Set 1

Dalour Younan

- 1-1 In its decision making process, the CPUC is considering four possible configurations through the Jamacha Valley area, along Willow Glen Drive, north of Steele Canyon Road (the Proposed Project plus three alternatives, which are described in DEIR Section C.4). The decision makers may weigh the consequences of each alternative, including environmental effects (summarized for noise in DEIR Section 3.7.2 of the Executive Summary) and other community issues, like EMF (see Section 3.8.3 of the Executive Summary, page ES-45, and General Response to Comment GR-2). Private easement issues are beyond the scope of the CEQA environmental review.

Comment Set 2
John Mood

Miguel-Mission 230 kV #2 Project

From: John Mood [1happyalien@cox.net]
Sent: Wednesday, May 12, 2004 9:43 AM
To: miguelmission@aspeneg.com
Subject: Mood, John - solar power

As to the need for more power in San Diego, one already present resource are the hundreds of solar powered homes. Our own system generates much more power than we use. We, & all others in similar situations, should be compensated for such extra electricity, which goes back to SDG&E & they use it. FREE!!!! for now. Make sure they pay for it in future.

2-1

John Mood

Responses to Comment Set 2

John Mood

2-1 A discussion of solar power is presented in Section C.5.4.1 (Renewable Resource Alternatives) on page C-51 of the Draft EIR and also in Section 4.5.2.2 of Appendix 2 on page Ap.2-86 of the Draft EIR. While the use of solar technology may be appropriate for some peaker plants, solar energy technologies cannot provide full-time availability or regional reliability given the current state of the industry. Therefore, the DEIR determined current solar technology does not meet the objectives of the Proposed Project. In addition, use of solar resources would still require new transmission lines to be constructed with impacts similar to the Proposed Project. Due to these reasons, solar technology was eliminated from full consideration in the Draft EIR.

The CPUC currently has an open proceeding on the Renewable Portfolio Standard (R.04-04-026) concerning the selling and procurement of renewable power, which may apply to the situation of individual excess renewable generation; however, this topic is outside of the scope of this project. The Renewable Portfolio Standard is also discussed in Section 4.5.1 of Appendix 2 of the Draft EIR (see page Ap.2-82).

Comment Set 3
Bob Meijer

Miguel-Mission 230 kV #2 Project

From: Bob Meijer [rmeijer@sprynet.com]
Sent: Wednesday, May 12, 2004 3:53 PM
To: miguelmission@aspeneq.com
Subject: Proposed power lines to

I would respectfully ask that approval for 35 mile transmission line be withheld unless each of the following questions are adequately asked and answered, to the satisfaction of the representatives of San Diego's residents.

3-1

1. Will the proposed line be used for EXPORTING (from the State of CA) power generated by three major power plants being built in Baja California: the 750-MW Intergen plant (the La Rosita Power Project or LRPP), the 310-MW La Rosita Expansion Project ("LRES") and the 600-MW Sempra Energy Resources plant in Mexicali (Mexico)? And, if so, will California rate payers be required to bear the full costs of building these lines or to endure any resulting cross-border pollution?

2. Will SDG&E either bury those new lines within the City of San Diego or ensure that home owners are fully compensated for any loss in the value of their homes caused by SDG&E's unwillingness to incur the expense to bury its new lines?

3-2

3. Will SDG&E restrict the access of competing electricity providers to the new lines or otherwise interfere with competing suppliers use of these lines?

3-3

4. If any of the lines are used to carry interstate power, will their use for this purpose be governed by ICC regulations on the sale of electric energy in interstate commerce?

3-4

5. How much of the added line capacity is additive to the San Diego region's overall reliability.

3-5

6. Why do we need additional power generation and carrying capacity when there is currently a national surplus of generating capacity (primarily Texas) and a decline in power consumption?

3-6

Thanks for your efforts to keep this matter public, open and transparent.

Regards,
Bob Meijer, San Diego

Responses to Comment Set 3

Bob Meijer

3-1 Please see Response to Comment B-1. CEQA does not address cost or need in the evaluation of the Proposed Project or alternatives. Discussion of who should pay for the project is also beyond the scope of the EIR. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer also to Responses to Comments CC3-1, 4-1, SD-1, and SD-2.

3-2 During the alternatives screening process, eight transmission alternatives were developed that would have been underground within the City of San Diego (see Sections 4.3 and 4.4 in Appendix 2 of the Draft EIR). These alternatives were feasible and met all project objectives. However, in comparison to the Proposed Project, all eight alternatives would have resulted in substantial temporary environmental impacts to air quality, unknown cultural resources, hazardous materials, noise, and traffic as a result of underground construction of the new transmission line. In addition, there would have been a significant delay of the project schedule. Because of the high level of temporary adverse impacts associated with the underground transmission alternatives, they were eliminated from full consideration within the Draft EIR.

Outside of the City of San Diego, two underground alternatives were carried forward for full analysis in the Draft EIR: the Jamacha Valley 138 kV/69 kV Underground Alternative, discussed in Section C.4.2.1 (see page C-9), and the City of Santee 138 kV/69 kV Underground Alternative, discussed in Section C.4.2.4 (see page C-30). The EIR analysis in Section E (Comparison of Alternatives), concluded that the underground alternatives are preferable to SDG&E's Proposed Project and have been incorporated into the Environmentally Superior Alternative.

CEQA does not address cost in the evaluation of the Proposed Project or alternatives. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer also to Response to Comment SD-1 and SD-2.

The Proposed Project is proposed to be located in an already existing utility ROW, where lines have existed since the mid-1950s. CEQA does not consider property values and the determination of environmental impact, because: (1) there is no consistent evidence that industrial facilities negatively impact property values; and (2) there are no defined or adopted CEQA standards for analysis of industrial project impacts on property values. As cited in CEQA Guidelines §15131, economic or social effects of a project *per se* are not considered as significant effects on the environment unless there is an indirect physical effect to the environment. However, such issues can be considered by the CPUC in its General Proceeding. In summary, although there is evidence that transmission lines may have affected property values in some cases, the effects are generally smaller than anticipated, and greater detailed studies on the subject are required to determine a direct correlation between the siting of industrial facilities (such as transmission lines) and property values. Please refer to GR-4 for a discussion of property values.

3-3 Future competition between electric providers is beyond the scope of CEQA and is therefore, not included in the Draft EIR.

- 3-4 The Proposed Project would connect to a regional transmission system that provides San Diego County with electricity, possibly generated outside California (DEIR, pages A-2 and A-3). The Federal Energy Regulatory Commission (FERC) regulates interstate energy markets. The Interstate Commerce Commission was terminated in 1995.
- 3-5 The Draft EIR, Section A.2 explains the Project Purpose and Need. All components of the Proposed Project would connect directly to the SDG&E transmission system. This means that all of the capacity provided by the Proposed Project would contribute to improving reliability within the SDG&E service territory (DEIR, page A-3).
- 3-6 Please refer to General Response GR-1 for an explanation of how the need for the Proposed Project is evaluated in the General Proceeding. Planning transmission system expansions is beyond the scope of CEQA and is therefore, not included in the Draft EIR.

Comment Set 4 Michael Bortoli

Miguel-Mission 230 kV #2 Project

From: Michael Bortoli [mbortoli@cox.net]
Sent: Thursday, May 13, 2004 11:02 AM
To: miguelmission@aspenerg.com
Subject: SDG&E's 35 mile transition powerline

A Quote from the Union Tribune

"Burying the lines in Santee would add at least \$20 million to the \$130 million project and would be paid for by ratepayers countywide, SDG&E said.

The utility favors above-ground lines as the least expensive and quickest way to complete the project.

A spokesman for the utility, David Johnson, said that to not undertake the project would be like bringing 1 million people into the county "and not building a new freeway. SDG&E's service territory desperately needs new transmission lines."

The full article <http://www.signonsandiego.com/news/metro/20040512-9999-7m12power.html>

After reading this I must ask, when is someone going to protect the people from these companies that only care about the cost of things and disregard human life? With as many people that are concerned about cancer clusters and EMF's, I would think spending the extra money for improved infrastructure would be welcomed. Plan for the future I say. If the people are worried about the problem, then they should not mind paying extra rates to be safe. If the people are worried about birds eating other animals, then they too should not mind having rate increases. Maybe the cities involved can pay the extra cost so they can protect their citizens. But defiantly, they should not be allowed to place American citizens at risk for cancer. Our country needs to start thinking to the future and begin producing safe power to its citizens. You being part of the PUC can help transform our sloppy and wasteful energy system into a clean affordable solution that does not hurt its citizens physically and financially.

The reason energy is getting so expensive is that these companies did not look to the future and their infrastructure is falling apart around themselves. If it is the responsibility of the PUC to protect the citizens of this country, it could start by not allowing them to pressure the community by using ignorant metaphors. They need to be told that they can proceed with the much needed project as soon as they have created a plan that complies to the concerns of the citizens that live with in the proximity of their project.

Last thing I feel the need to say is San Diego has been financially raped by Power and Oil companies. I am sure many other places in the US have too, but I live here. People can not have a good quality of life if they have to give every extra cent they earn to power companies that do not take care of equipment. Maybe someday us citizens will wise up and design mini power stations that control our individual homes, maybe with the use of Solar Energy Reclamation.

Thank you for reading this. They said you wanted public comments. Here is mine.

Concerned citizen,
Michael Bortoli

4-1

4-2

4-3

4-4

Comment Set 4, cont.
Michael Bortoli



SDG&E proposes to line up new power

By Jose Luis Jiménez
UNION-TRIBUNE STAFF WRITER

May 12, 2004

Everyone agrees San Diego County needs every spare kilowatt it can get. There is disagreement on how to build the infrastructure to get it.

The California Public Utilities Commission held public hearings the past two days on a proposal by San Diego Gas & Electric to build a 35-mile transmission line. The line would link a substation near Chula Vista with one in Mission Valley.

The project would allow the utility to import more electricity from plants in Mexico and distribute it countywide.

The PUC recently completed a draft of the environmental impact report, which noted that portions of the project could be relocated and placed under streets. The locations are a one-mile section near the northern end of Magnolia Avenue in Santee and a 3.5-mile section along Willow Glen Road in the Jamacha Valley.

The agency rejected Santee's request to bury the line within the city limits. The new transmission line would be added to 21 wires strung along large metal towers that pass through the city's northern edge and Fanita Ranch, where a developer wants to build hundreds of luxury homes.

The agency determined it would be too expensive and harmful to the environment to bury the lines in that hilly and rocky terrain.

PUC Commissioner Loretta Lynch and Administrative Law Judge Robert Barnett heard from about 30 people at four meetings in Santee, Spring Valley and El Cajon.

Some of them want the lines buried for environmental, aesthetic and health reasons. And a few urged that the project be stopped because, they said, more capacity would promote the development of plants in Mexico and contribute to pollution on this side of the border.

One group, Preserve Wild Santee, supported the undergrounding request because it would prevent birds of prey from using the towers and poles as bases to feed on endangered species.

The new line is to run about 100feet behind the Glenn Urie's home in Santee. He requested it be buried to protect him from any electromagnetic fields, or EMFs, generated by the wires, which some studies suggest lead to leukemia and other health problems.

The California Public Utilities Commission will accept public comments through Monday on SDG&E's proposal to erect a 35-mile transmission line.

Comments can be sent by e-mail to miguelmission@aspene.com or by fax to (619) 353-5044.

Letters postmarked by Monday can be sent to Michael Rosauer, California Public Utilities Commission, c/o Aspen Environmental Group, 235 Montgomery St., Suite 935, San Francisco, CA 94104.

Comment Set 4, cont.

Michael Bortoli

The group Santee Citizens for Safe Power echoed Urie's request.

"(EMFs) should be taken as if they do cause problems until it can be proven they don't cause problems," Urie said at Monday's hearing.

Representatives from business groups and government agencies asked the PUC to approve the project as quickly as possible. They fear summer temperatures will bring back rolling blackouts.

"We support any infrastructure improvements that help maintain service to our schools," said Eric Thompson, speaking on behalf of the La Mesa-Spring Valley School District.

Burying the lines in Santee would add at least \$20 million to the \$130 million project and would be paid for by ratepayers countywide, SDG&E said.

The utility favors above-ground lines as the least expensive and quickest way to complete the project.

A spokesman for the utility, David Johnson, said that to not undertake the project would be like bringing 1 million people into the county "and not building a new freeway. SDG&E's service territory desperately needs new transmission lines."

The commission is expected to make a decision by the end of the year.

■ Jose Jimenez: (619) 593-4964; jose.jimenez@uniontrib.com

Find this article at:
<http://www.signonsandiego.com/news/metro/20040512-9999-7m12power.html>

Check the box to include the list of links referenced in the article.

Responses to Comment Set 4 Michael Bortoli

4-1 The full article from the Union Tribune is noted and it is acknowledged that this project would be paid for by ratepayers countywide. CEQA does not address cost in the evaluation of the Proposed Project or alternatives. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer also to Responses to Comments CC3-1, SD-1 and SD-2.

A determination of need for the project has already been approved by the CAISO and the CPUC (see General Response GR-1). The Purpose and Need for the Proposed Project is discussed in Section A.2 of the Draft EIR, but it is not an issue determined by CEQA. One of SDG&E's objectives of the Proposed Project (see page A-3 of the Draft EIR) is to reduce transmission constraints within SDG&E's electric system, which would reduce system congestion costs.

4-2 As is described in Response to Comment 4-1, CEQA does not address cost in the evaluation of the Proposed Project or alternatives. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer to Responses to Comments SD-1 and SD-2. Please also refer to General Response GR-2 for a discussion of EMF.

4-3 The commenter's support for clean, affordable energy is noted. The cost of energy and of the project is beyond the scope of this EIR. See Response to Comment CC3-1. Renewable resource alternatives applicable to the San Diego area are discussed in Appendix 2 (Alternatives Screening Report), Section 4.5.2 of the Draft EIR.

4-4 Please refer to Response to Comment 2-1 for a discussion of solar power and the Renewable Portfolio Standard. See also Response to Comment 4-1.

Comment Set 5
Lonna & Mike Perry

Miguel-Mission 230 kV #2 Project

From: LUREVILLE@aol.com
Sent: Sunday, May 16, 2004 9:21 PM
To: miguelmission@aspeneq.com
Subject: Draft EIR 230kv #2 Project

Dear Michael Rosauer,

We are residents of El Cajon living directly above and adjacent to the proposed project area where additional power towers would possibly be installed by SDG&E. We strongly believe that this project is not in the best interest of our community. The EIR draft clearly shows that El Cajon, as well as the other affected communities, would be negatively affected in areas of health, and aesthetics (loss of view and ultimately reduced property values).

Please let it be stated that we will continue to fight SDG&E's proposal, as it is in the best interest of our community to do so.

Thank you.

Lonna & Mike Perry
2472 Wind River Road
El Cajon, CA 92019
(619) 440-4215

5-1

Responses to Comment Set 5 Lonna & Mike Perry

- 5-1 The commenters' opposition to the Proposed Project is noted. Please refer to Section D.9 (Public Health and Safety) for a discussion of the health effects of the Proposed Project and General Response GR-2, which specifically addresses EMF.

The Proposed Project would include the relocation of the 138 kV and 69 kV circuits on wood and steel pole structures and the installation of the 230 kV line on replaced or modified lattice towers. Implementation of Mitigation Measures V-1 through V-6 would reduce all potential visual impacts to less than significant levels. These measures, which are listed in Table 13-9 on page D.13-130 of the Draft EIR, include mitigation that would act to minimize potential visual impacts, such as ensuring the conductors do not cause view obstructions from residences, using screening around construction staging areas, and minimizing ground disturbance to landscaping, etc. Please refer to General Response GR-5 for a discussion of aesthetic effects.

Please refer to Response to Comment 3-2 and General Response GR-4 regarding property values.

Comment Set 6
Mary E. England

Miguel-Mission 230 kV #2 Project

From: mary-england [mary-england@cox.net]
Sent: Sunday, May 16, 2004 3:47 PM
To: miguelmission@aspeneg.com
Subject: Please note my support of the original proposal by SDG&E

Importance: High

I spoke at the public hearings in San Diego regarding the need for cost effective energy. I support the need for cost effective energy and the need to keep our senior population in mind, as they are on set incomes and any raise in energy costs dramatically effect them. The senior population struggles on set incomes now - and any additional costs are a hardship on them, as well as a terrible burden on them.

6-1

I would also like to add to my testimony that I support the project as originally proposed by SDG&E. At the time I gave my testimony in support of cost effective energy, I did not give my opinion on which proposal I supported. That is why I wanted to give you my opinion in a follow up e-mail message.

6-2

Thank you for taking the time to take my testimony.

For the record here is my information:

Mary England
7915 Nichols Street
Lemon Grove, CA 91945

Sincerely,
Mary E. England
(619) 466-1111

Responses to Comment Set 6
Mary E. England

- 6-1 On February 27, 2003, the CPUC made a finding of need for the Miguel-Mission Project citing economic benefits (see Decision D.03-02-069 in docket No. I.00-11-001) (DEIR, page A-3). Please see General Response GR-1. The Purpose and Need for the Proposed Project is discussed in Section A.2 of the Draft EIR, but it is not an issue determined by CEQA. One of SDG&E's objectives of the Proposed Project (see page A-3 of the Draft EIR) is to reduce transmission constraints within SDG&E's electric system, which is intended to reduce system congestion costs.
- 6-2 The commenter's support for the Proposed Project is noted.

Comment Set 7
Jeff Bruhn

Miguel-Mission 230 kV #2 Project

From: Jeff Bruhn [jbruhn@cox.net]
Sent: Sunday, May 16, 2004 6:28 AM
To: SDG&E SDG&E
Subject: Bruhn, Jeff - CPUC

I testified at the recent public hearings in San Diego on the Miguel Mission project. This letter is to express my support for this project as originally proposed by SDG&E. I do believe this will bring us the reliable energy we need as quickly as possible and at the most reasonable cost. Thanks, Jeff Bruhn (619-954-6188)

7-1

Responses to Comment Set 7
Jeff Bruhn

7-1 The commenter's support for the Proposed Project is noted.

Comment Set 8 Gregg Guenther and Ellen Holaway - Santee Citizens for Safe Power

Michael Rosauer, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA. 94104

Re: Miguel-Mission Project 230kV #2 Project

May 17, 2004

The following comments represent those of my neighbors, friends, and fellow citizens. Correspondence has been sent in response to the scoping meetings and the PUC hearings observed. These people and others have made statements at the PUC hearings and to various jurisdictional authorities of representation. Many more individuals have contacted me after the Draft EIR hearings to request that I include their thoughts and desires to you once again.

8-1

The overwhelming sentiment of the aforementioned group, is to have **all lines including new or pre-existing transmission lines** of the Miguel-Mission project distanced and undergrounded with shielding through the Santee City limits. This engineering is included in the DEIR and was elaborated on during the workshop portion of the PUC hearings by the consultants from Commonwealth Associates and Aspen Environmental Group.

Undergrounding and shielding is not only possible but has precedent in other parts of the state of California as well as the United States.

The logic for relocation, undergrounding, and shielding originates from the analysis of EMF erosion illustrated in the Executive Summary page ES 45, "City of Santee 138kV/69kV Underground Alternative".

8-2

Additionally, to construct an EMF zone along property lines and within bedrooms of children along the southerly right-of-way, as described in the "...230kV Overhead Northern Boundary Alternative" appears to subject humans to an adverse and significant impact. To validate this fact I refer you to Appendix 5.5 of the DEIR for precautionary measures and established levels of EMFs determined and confirmed by the World Health Organization, and the California Department of Health Services about increase risks of certain cancers and leukemia.

The experts that you commissioned to provide this EIR are **all in agreement that a total undergrounding project is possible**, both from the technological standpoint and the physical aspect. Dave Shafer of CAI and Brewster Birdsall of Aspen drew pictures and explained the methods by which this can be achieved.

8-3

Prudent and precautionary action now, with foresight of other projects, applied for by SDG&E, will allow for reliable energy and **safe power** in the environment where humans live, play, and go to school.

8-4

Commissioner Lynch was very helpful in listening, recognizing, and explaining the procedures and options that were not identified in the DEIR. We extend our gratitude and appreciate the

Comment Set 8, cont.
Gregg Guenther and Ellen Holaway - Santee Citizens for Safe Power

conscientious participation of Commissioner Lynch, and all the other representatives from Aspen and CAI.

Therefore, we request that the CPUC waive the 4% cost benchmark for EMF mitigation for the Santee portion of the project and comply with the city policy of undergrounding. Please direct Aspen to come back with a plan that prevents the exposure of children and families to an unnecessary tragedy that can be prevented.

Respectfully

Gregg Guenther
Ellen Holaway
Santee Citizens For Safe Power

Tom & Shelly Echols Santee	Christopher Garvin Santee	Richard Wilkins Santee
Edward Alsop Santee	Itshak Alfasy Santee	Michele & Sal Campos Santee
Matthew & Irene DePhillips Santee	Jim Holaway Santee	Robert & Linda Chappelle Santee
Barbara Zaino Santee	William Bennett Santee	Joel Ciuchta Santee
Brian Canterini Santee	Adam Elliott Santee	Joseph Garafalo Santee
Mari & Mike Harrod Santee	Hilari Kramer Santee	Harold Sosa Santee
Paula Lambert Santee	Nancy McDaniel Santee	Julia Michelmore Santee
Susan Monroe Santee	Mary Jo Moses Santee	John & Connie Parker Santee
Lucas Phillips Santee	Dennis & Barbara Pope Santee	Dave & Gail Quashnick Santee
Lanny Shorey Santee	Scott & Jennie Sinclair Santee	Gary & Debra Phillips Santee

8-4

Responses to Comment Set 8

Gregg Guenther and Ellen Holaway - Santee Citizens for Safe Power

8-1 Please refer to Section D.9 (Public Health and Safety) for a discussion of the health effects of the Proposed Project and General Response GR-2, which specifically addresses EMF. The commenters' support for the distancing and undergrounding of all new and pre-existing transmission lines is noted. The City of Santee 138 kV/69 kV Underground Alternative, found to be environmentally superior to the Proposed Project, would underground the 138 kV/69 kV lines within the City of Santee. Please refer to General Response GR-3 and Response to Comment E-8.

In addition to the City of Santee and Jamacha Valley Underground Alternatives, eight other major underground or partially underground routing alternatives were developed and are discussed in Sections C.5.3.4 through C.5.3.11, as well as in Appendix 2, Sections 4.3 and 4.4. These alternatives were feasible and met all project objectives. However, in comparison to the Proposed Project, all eight alternatives would have resulted in substantial temporary environmental impacts to air quality, unknown cultural resources, hazardous materials, noise, and traffic as a result of underground construction of the new transmission line. In addition, there would have been a significant delay of the project schedule. Because of the high level of temporary adverse impacts associated with the underground transmission alternatives, they were eliminated from full consideration within the Draft EIR.

8-2 General Response GR-2 explains how the CPUC decision makers consider EMF during the process of comparing the alternatives to the Proposed Project. Please refer to page D.9-31 and Table D.9-11 on page D.9-33 of the Draft EIR for a discussion of EMF levels for the City of Santee 230 kV Overhead Northern Boundary Alternative.

8-3 The comment supports selection of a total undergrounding of all new and pre-existing transmission lines. The City of Santee 138 kV/69 kV Underground Alternative would partially achieve the commenters' goal, however total undergrounding is not an alternative that was analyzed in the Draft EIR because although it may be technically feasible to alter the pre-existing 230 kV circuit, it would not be legally feasible to do so through this proceeding. Please also refer to General Response GR-3 and Response to Comment E-8 for a discussion of undergrounding pre-existing transmission lines.

8-4 Please see General Response GR-2 regarding EMF. As discussed in Section D.9.6.3, Scientific Background and Regulations Applicable to EMF, under D.93-11-013, no-cost/low-cost EMF mitigation would be applied to the Proposed Project and is specifically discussed on page D.9-25 of the Draft EIR. CPUC Decision D.93-11-013 is the current CPUC policy with respect to EMF mitigation and, therefore, is the standard discussed in the Draft EIR. However, the CPUC could consider in its General Proceeding whether those policies should be modified.

CEQA does not address cost in the evaluation of the Proposed Project or alternatives. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer also to Responses to Comments CC3-1, SD-1, and SD-2. Two underground alternatives were carried forward for full analysis in the Draft EIR: the Jamacha Valley 138 kV/69 kV Underground Alternative, discussed in Section C.4.2.1 (see page C-9), and the City of Santee 138 kV/69 kV Underground Alternative, discussed in Section

C.4.2.4 (see page C-30). The EIR analysis in Section E (Comparison of Alternatives), concluded that the underground alternatives, including one the within the City of Santee, are preferable to SDG&E's Proposed Project and have been incorporated into the Environmentally Superior Alternative.

Comment Set 9
Arlen and Elaine Watt

Arlen and Elaine Watt
10881 Oak Creek Dr.
Lakeside, CA. 92040

Michael Rosauer, CPUC
c/o Aspen Environmental Group
235 Montgomery St. Ste 935
San Francisco, CA. 94104

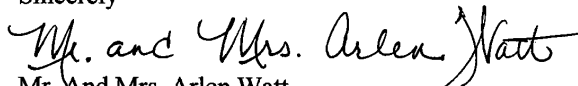
Cc: Public Utilities Commission
Tom Murphy, Aspen Environmental Group, VP Sacramento Operations
Director, Energy Division, Public Utilities Commission

Re: Project name: Otay Mesa Power Purchase Transmission Project
Application Number: A. 04-03-008

Dear Sir,

We object to this project. We were never notified of or during the scoping process. We have towers within 300 ft. of our home. We were not given any opportunity to participate, as we were never notified before April 2004. We had no time to come together with our neighbors and community regarding this project to decide if there is a need for legal advice; as we believe the scope of this project is very narrow.

Sincerely


Mr. And Mrs. Arlen Watt

9-1

Responses to Comment Set 9 Arlen and Elaine Watt

9-1 Although the Miguel-Mission 230 kV #2 Project includes a discussion of the future circuit, which is included as part of the Otay Mesa Power Purchase Agreement Transmission Project (Application #A.04-03-008), the Otay Mesa Project is a separate project with its own CEQA environmental review process. Please see also Response to Comment E-1 and General Response GR-1.

Under the California Environmental Quality Act (CEQA) Guidelines §15087, the requirements for the public review process of the Draft EIR are as follows.

(a) The lead agency shall provide public notice of the availability of a draft EIR at the same time it sends a notice of completion to OPR [Office of Planning and Research]. This notice shall be given as provided under Section 15105. Notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures:

(1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.

(2) Posting of notice by the public agency on and off the site in the area where the project is to be located.

(3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

In addition, the CPUC's General Order 131-D guides utilities in the application process. Item 1.b in Section XI, details the 300-foot notification requirement, which applies to SDG&E when it files its application. These notification guidelines apply only to the proposed route, not to alternative routes. General Order 131-D states:

Notice of the filing of each application for a CPCN for facilities subject to the provisions of Sections VII, VIII, and IX.A of this General Order . . . shall be given by the electric public utility within ten days of filing the application:

1. By direct mail to . . .

(b) All owners of land on which the proposed facility would be located and owners of property within 300 feet of the right-of-way as determined by the most recent local assessor's parcel roll available to the utility at the time notice is sent . . .

Notification and Public Involvement for the Miguel-Mission 230 kV #2 Project. The names and addresses of property owners were provided to the CPUC by SDG&E and were generated using the most recent equalized assessment roll. While the CPUC tries to ensure that all affected parties receive notification, due to changes in property ownership and other factors sometimes the mailed notification does not reach its intended recipients.

Therefore, the CPUC uses additional means of communication with the public. As detailed in Section H (Public Participation) of the Draft EIR and Section 2 of the Final EIR, following is a summary of notification and public outreach efforts undertaken by the CPUC since the submittal of SDG&E's Application:

- **Notice of Preparation (NOP)** was mailed to affected agencies, county and city departments, special districts, property owners, everyone on the CPUC Service list, and interested parties on September 5, 2003;
- **Document Repositories** were set up at 12 locations throughout the Proposed Project area;
- Establishment of an **email address and a telephone/fax hotline** for Project Information;
- A **newspaper notice** for the two public scoping meetings was published in the *San Diego Union Tribune* on September 8, 2003 and in the *East County Californian* on September 12, 2003, prior to the first meeting on September 15, 2003.
- Two **Scoping meetings** were held on the following dates and locations:
 - September 15, 2003, at 5:30 pm at the Spring Valley Branch Library, Spring Valley
 - September 16, 2003, at 7:00 pm at the Santee City Hall, Santee.
- **Notice of Release (NOR) of the Draft EIR** was mailed to 1,173 interested parties, agencies, county and city departments, special districts, property owners, and occupants on or adjacent to SDG&E's Proposed *and* the alternative routes in April 2004 at the time the Draft EIR was released. The Notice included information on how to gain access to the Draft EIR, information on the Environmentally Superior Alternative, and the dates, times and locations for informational workshops on the Draft EIR (May 2004) as well as the CPUC's Public Participation Hearings (May 2004);
- **Copies of the full Draft EIR** were sent to 61 interested parties and agencies, and to 12 libraries used as document repositories. 53 copies of the Executive Summary and 7 CD's with the text of the Draft EIR were also sent out. Additional copies of the Executive Summary and of the CD's with the text of the Draft EIR were distributed at the workshops and Public Participation Hearings in May 2004;
- **Newspaper Notices.** Information on the Draft EIR, including the project website address and the dates and times of the Public Informational Meetings, was printed in the *San Diego Union Tribune* on May 2 and May 9, 2004 and in the *East County Californian* on April 29 and May 6, 2004;
- Four informal **Public Information Workshops** and simultaneous **Public Participation Hearings (PPHs)** were held by the Administrative Law Judge at the following dates and locations:
 - May 10, 2004 at 4:00 pm and at 7:00 pm at the Santee City Hall, Santee;
 - May 11, 2004 at 4:00 pm at the Spring Valley Branch Library, Spring Valley; and
 - May 11, 2004 at 7:00 pm at the El Cajon Community Center, El Cajon.
- **CPUC Website.** The NOP, announcements of scoping meetings, NOR, the dates and times of the Public Informational Workshops and Public Participation Hearings, and the text of the Draft EIR were posted on the project website on the Internet at:

http://www.cpuc.ca.gov/environment/info/aspen/miguel_mission/miguelmission.htm

Comment Set 10
J. Michael Lowell

11348 Fredcurt Lane
Lakeside, CA 92040
May 13, 2004

California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery St. Suite 935
San Francisco, CA 94104
attn: Michael Rosauer

Dear Mr. Rosauer,

Please do not allow SDG&E to proceed with the plans for extending the 35-mile long transmission line in San Diego County as proposed. I live near the present transmission lines and they are NOT good neighbors.

10-1

The visible pollution from the present tower system is worse than an automobile junkyard. Otherwise, my neighborhood is "country" and naturally scenic. The noise pollution is also overwhelming. At night, when the air is moist, the "buzz" coming from the lines can be heard for a mile or more, thus destroying another reason for country living.

10-2

10-3

Nobody knows about the EMF factor. I will not be surprised to hear that in the future the government, once again, will admit that it was wrong and that it really does cause cancer, Alzheimer's or whatever.

10-4

The lines should be buried, as SDG&E has so often promised but seldom delivered. The cost should be borne by SDG&E and NOT passed on to the ratepayers. The PUC has formerly allowed huge profits by this company without it delivering on its promises. Where has all these profits gone? As if I didn't know!

10-5

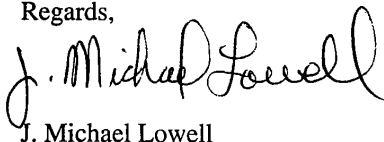
10-6

Otherwise, please route the lines further to the north, around Santee and Lakeside, or route them over the homes of those who feel that we need them. I do not. This unfavorable opinion is based on the lack of true energy facts coming from SDG&E.

10-7

I have lived in San Diego since 1948, and please accept my apologies if I'm wrong but, does the PUC ever override anything that SDG&E proposes? Please consider the hundreds of residents affected by this plan and do the right thing! Either bury the lines or bury the plan!

Regards,



J. Michael Lowell

Responses to Comment Set 10

J. Michael Lowell

- 10-1 The commenter's opposition to the Proposed Project is noted.
- 10-2 The Proposed Project would include the relocation of the 138 kV and 69 kV circuits on wood and steel pole structures and the installation of the 230 kV line on replaced or modified lattice towers. Implementation of Mitigation Measures V-1 through V-6 would reduce all potential visual impacts to less than significant levels. These measures, which are listed in Table 13-9 on page D.13-130 of the Draft EIR, include mitigation that would act to minimize potential visual impacts, such as ensuring the conductors do not cause view obstructions from residences, using screening around construction staging areas, and minimizing ground disturbance to landscaping, etc. Please refer to General Response GR-5 for a discussion of aesthetic effects.
- 10-3 Corona noise for the portions of the ROW through Lakeside would not exceed the applicable San Diego County Code ordinances, as described in Section D.8.3.3, under the discussion of Impact N-3, related to corona noise (DEIR page D.8-9). For these subsections of the Proposed Project, the noise levels of the Proposed Project would attenuate quickly to below background levels. They would be under 36 dBA at the edge of the ROW, which would not exceed local nighttime standards of 45 dBA (page D.8-5). To keep future corona noise at a minimum and ensure that the project-related components are properly maintained over time, the Draft EIR recommends Mitigation Measure N-3b, which requires SDG&E to respond to future noise complaints. The Final EIR includes text changes to clarify the scope of this impact.
- 10-4 Please refer to General Response GR-2 and Section D.9 (Public Health and Safety) for an explanation of how EMF is handled by the decision-makers.
- 10-5 Two underground alternatives were carried forward for full analysis in the Draft EIR: the Jamacha Valley 138 kV/69 kV Underground Alternative, discussed in Section C.4.2.1 (see page C-9), and the City of Santee 138 kV/69 kV Underground Alternative, discussed in Section C.4.2.4 (see page C-30). The EIR analysis in Section E (Comparison of Alternatives) concluded that the underground alternatives are preferable to SDG&E's Proposed Project and these route modifications have been incorporated into the Environmentally Superior Alternative. Please see Response to Comment 10-7 and General Response GR-3 for a discussion of alternatives and of undergrounding transmission lines, respectively.
- 10-6 CEQA does not address cost or need in the evaluation of the Proposed Project or alternatives. Discussion of who should pay for the project is also beyond the scope of the EIR. Please refer to Response to Comment CC3-1. Cost of the project and alternatives is addressed by the CPUC in the General Proceeding on the project. Please refer also to Responses to Comments 4-1, SD-1, and SD-2.
- 10-7 As detailed in Section 2.3 of Appendix 2 (Alternatives Screening Report), CEQA requires that the EIR must evaluate a "reasonable range of alternatives." The Miguel-Mission 230 kV #2 Project EIR evaluated 16 transmission alternatives, in addition to non-wires alternatives and the No Project Alternative. Eight of these alternatives were routed to avoid the City of Santee (see Sections C.5.3.4 through C.5.3.11, as well as in Appendix 2, Sections

4.3 and 4.4). These alternatives were feasible and met all project objectives. However, in comparison to the Proposed Project, all eight alternatives would have resulted in substantial temporary environmental impacts to air quality, unknown cultural resources, hazardous materials, noise, and traffic as a result of underground construction of the new transmission line. In addition, there would have been a significant delay of the project schedule. Because of the high level of temporary adverse impacts associated with the underground transmission alternatives, they were eliminated from full consideration within the Draft EIR.

In general, an alternative must meet the project objectives, be feasible, and avoid or substantially lessen significant effects of the project. Routing the project north around Santee and Lakeside would accomplish similar objectives as the previous eight alternatives, but it would also have similar impacts and would substantially lengthen the project route causing impacts to additional areas and lengthening the construction schedule. Therefore, it was eliminated in the screening/tiering process and not carried through for full analysis of environmental impacts in the DEIR. Also, please see Response to Comment 11-1.

A determination of need for the project has already been approved by the CAISO and the CPUC in 2003 (see General Response GR-1). The Purpose and Need for the Proposed Project is discussed in Section A.2 of the Draft EIR, but it is not an issue determined through the CEQA environmental review process for the Proposed Project. Therefore, the need for this project is not addressed or decided within this EIR.

Past CPUC determinations to approve projects are outside the scope of the environmental review process for the proposed Miguel-Mission project, however, the commenter's support for underground lines and opposition to the Proposed Project are noted.