

# **PUBLIC SCOPING REPORT**

## **San Diego Gas & Electric Company's Proposed Miguel-Mission 230 kV #2 Project**

**CPCN Application No. 02-07-022  
SCH No. 2003091025**



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# 1. Overview of Public Scoping Process

## 1.1 Introduction

San Diego Gas and Electric Company (SDG&E) has filed an application for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the proposed Miguel-Mission 230 kV #2 Project. The CPUC has determined that an Environmental Impact Report (EIR) is required to evaluate the project under the California Environmental Quality Act (CEQA).

According to SDG&E, the Proposed Project is needed to meet the projected electric demand in the San Diego region, while complying with AB 970 legislative mandates. New and modified transmission facilities and modifications to existing substations are needed to serve existing electrical load and projected growth in the San Diego area. The Proposed Project would include three major components, as described below.

### **New 230 kV Circuit between Miguel and Mission Substations**

The major part of the project would include the installation of a new, bundled 230 kV circuit between Miguel and Mission Substations, which would be located entirely within SDG&E's existing 35-mile right-of-way (ROW).

- Between Miguel Substation and Fanita Junction, a distance of approximately 24 miles (24 of the 35-mile ROW), the new 230 kV circuit would be installed onto existing steel lattice tower structures currently supporting 69 kV and 138 kV circuits. This would require removal of the existing 69 kV and 138 kV circuits, which would then be relocated to a newly constructed alignment of wood and steel pole structures within the existing SDG&E ROW. In order to accommodate the 230 kV circuit, 60 of the existing steel lattice towers would be modified, 31 of the towers would be replaced with new poles, and 11 new poles would be constructed between Miguel Substation and Fanita Junction.
- Between Fanita Junction and Mission Substation, a distance of approximately 11 miles (11 of the 35-mile ROW), the new 230 kV circuit would be installed in a vacant position on existing steel lattice and steel pole structures.

### **Relocation of 69 kV and 138 kV Circuits onto New Poles**

As described above, approximately 24 miles of the existing 69 kV and 138 kV circuits would be relocated onto new steel and wood poles within the existing ROW. This phase of the project would require installation of 108 new poles (94 steel and 14 wood) between Miguel Substation and Fanita Junction. The new pole structures would range between 45 and 120 feet in height and would span a distance between 300 and 3,500 feet.

### **Substation Modifications**

Modifications of the existing Miguel and Mission Substations would be required to accommodate the new 230 kV circuit. These modifications would consist of the addition of new 230 kV circuit breakers and switching equipment, bus and transport structures, control and communication systems, and new concrete foundations to be poured within the existing substations.

## 1.2 Public Scoping for the Miguel-Mission 230 kV #2 Project

In compliance with CEQA guidelines, a Notice of Preparation (NOP) was sent to 44 interested agencies and 1,178 members of the public on September 5, 2003. The CEQA scoping process allows government agencies and the public an opportunity to provide comments on the issues and scope of the EIR. The review period on the NOP ended on October 5, 2003. Written and oral comments received during the scoping process are part of the project record; they have been reviewed and will be considered by the CPUC in scoping the EIR.

In addition to the written scoping process, the CPUC held two public scoping meetings in September 2003 in order to provide the public and governmental agencies information on the CEQA process and to provide an opportunity to identify environmental issues and alternatives for consideration in the EIR. Public scoping meetings were held at the following locations and times:

- September 15 – 5:30 to 7:30 p.m., Spring Valley Branch Library, 836 Kempton Street, Spring Valley
- September 16 – 7:00 to 9:00 p.m., Santee City Hall, 10601 Magnolia Avenue, Building 7, Santee.

Thirty-four members (8 in Spring Valley and 26 Santee) of the public and representatives from organizations and government agencies attended the two scoping meetings. A total of 63 written and 14 verbal comments were received during the NOP scoping process from public agencies and private citizens. The input received during the scoping process will assist the CPUC in identifying the range of actions, alternatives, environmental issues, and potential effects associated with the Proposed Project. All issues raised in the scoping meetings will be reviewed by the CPUC to determine the appropriate consideration and level of analysis.

## 1.3 Public Notification

Public notification about the project and the scoping meetings included newspaper announcements and mailing of the NOP. Notice for the public scoping meetings was published in the *San Diego Union Tribune* and *East County Californian* on September 8 and September 12, 2003, respectively. In addition, the NOP was mailed to 1,178 stakeholders on the mailing list, including homeowners, residents, private organizations, and interest groups. The notification list (provided by SDG&E) included all property owners within 300 feet of the project facilities. Appendix A contains copies of the NOP and mailing list.

## 1.4 Agency Notification

The NOP was sent to federal, State, and local trustee and responsible agencies that may be affected by the Proposed Project. Distribution of the NOP included 12 federal agency departments, 25 State agency departments, nine county departments, seven city departments, 16 Native American groups, and 11 special districts.

The NOP was also available on the CPUC's environmental website for the project at: [http://www.cpuc.ca.gov/environment/info/aspen/miguel\\_mission/nop.pdf](http://www.cpuc.ca.gov/environment/info/aspen/miguel_mission/nop.pdf). In addition, SDG&E's Proponent's Environmental Assessment (PEA) and Application are available on the Miguel-Mission CPUC website.

## 1.5 CEQA Process Beyond Scoping

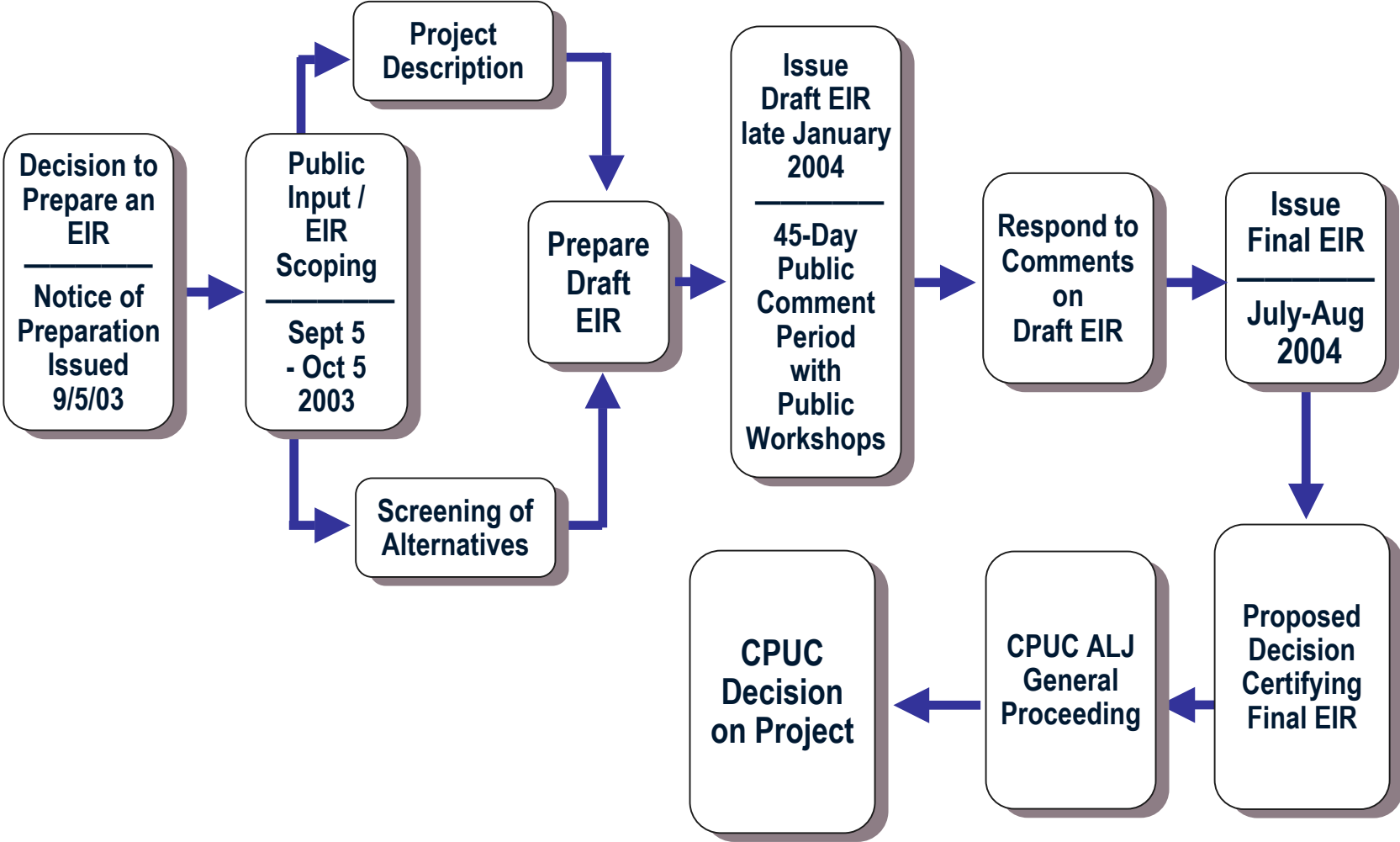
The scoping process documented in this report is the first step of the CEQA process that will culminate with the issuance of Draft and Final Environmental Impact Reports (EIRs) evaluating the Proposed Project. The Miguel-Mission CEQA process, and the approximate anticipated schedule for future actions are illustrated in a flow chart in Figure 1-1. It should be noted that this Scoping Report falls under the second item (Public Input/EIR Scoping) in the process flow chart.

## 1.6 Scoping Report Organization

This scoping report summarizes the comments and issues identified through the NOP scoping process and public scoping meetings. The remainder of this report is organized as follows:

- **Section 2** provides an overall summary of the comments and issues.
- **Appendix A** provides the scoping meeting and notification materials, including:
  - A-1: Notice of Preparation (NOP)
  - A-2: NOP Mailing List
  - A-3: Scoping Meeting Materials
- **Appendix B** provides summaries of verbal and written comments
  - B-1: Summary of Written Comments Received from Government Agencies
  - B-2: Summary of Written Comments Received from Private Organizations and Companies
  - B-3: Summary of Written Comments Received from Private Citizens
  - B-4: Summary of Oral Comments Received at Scoping Meetings
  - B-5: Summary of Agency Consultations
- **Appendix C** includes the letters received in response to the NOP
  - C-1: Comments from Government Agencies
  - C-2: Comments from Private Organizations and Companies
  - C-3: Comments from Private Citizens

Figure 1-1. Miguel-Mission CEQA Process



## 2. Summary of Public Comments

This section summarizes the comments raised by the public and agencies during the scoping process for the Miguel-Mission 230 kV #2 Project EIR. This summary is based on both written and oral comments that were received during the NOP review period, which ended on October 5, 2003. It also includes comments received at two scoping meetings held in the project area in September 2003.

A total of 63 written and 14 verbal comments were received during the scoping process from federal, State, local, and county government agencies, school districts, non-profit organizations, and concerned members of the public. Private citizens and homeowners provided the majority of the comments. In addition to private individuals, comments were received from the following organizations:

- Preserve Wild Santee
- Santee Citizens for Safe Power.

Comments were also received from the following government agencies:

- Cajon Valley Union School District
- City of San Diego
- City of Santee
- County of San Diego Department of Parks and Recreation
- County of San Diego Department of Planning and Land Use
- Marine Corps Air Station Miramar
- Otay Water District
- Padre Dam Municipal Water District.

Appendix B contains a summary of all written and oral comments received.

The specific issues raised during the public scoping process are summarized according to the following major themes:

- Purpose and Need
- Human Environment Issues and Concerns
- Natural Environment Issues and Concerns
- Alternatives
- Environmental Review and Decision Making Process.

### 2.1 Purpose and Need

The purpose and need for the project was addressed in numerous comments received from individuals living in Santee, El Cajon, and Lakeside. Public comments expressed concern that SDG&E had not provided: adequate justification for project need; an adequate description of future use for the transmission lines; an adequate description of future growth in the area and impact on energy supply/demand; information on energy sources and markets; and a sufficiently detailed explanation on what is causing the demand for the project. Many residents from the Cities of Santee and El Cajon questioned whether the need for electricity in other parts of the State outweighs the quality of life needs for residents affected by the project.

## 2.2 Human Environment Issues and Concerns

Nearly all of the public and agency comments raised strong concerns regarding the potential impacts of the project on the human environment, most often expressing concerns with health risks associated with increased electric and magnetic fields (EMF) emissions, visual, noise, and scenic impacts, as well as impacts to property values. Other concerns dealt with construction impacts, safety issues and fire risk, conflicts with planned uses, traffic and transportation, utilities and services, recreation, and overall quality of life.

### EMF-Related Health and Safety Issues

A clear majority of all comments submitted by members of the public, agencies, and community organizations expressed strong concern with the potential human health effects that may result due to the EMF levels that would be emitted by the proposed 230 kV transmission line. Comments expressed concern about the potential impacts to children and the elderly from EMF exposure, and potential for increased incidence of childhood leukemia, brain tumors, miscarriages, and Amyotrophic Lateral Sclerosis (ALS), citing recent studies from the National Institute of Health, the California Department of Health Service, and the book *The Great Power-Line Cover-Up*, by Paul Brodeur.

The Santee Citizens for Safe Power provided numerous verbal and written comments requesting that the EIR provide full, complete, and fair disclosure of real and perceived impacts of EMF due to transmission lines. Comments requested that more EMF measurements be conducted to quantify exposure levels and that the studies be provided in the environmental review. Along with this analysis, the EIR should include an extensive review of scientific literature. Many of the comments received on human health topics emphasized the sensitive nature of the residential areas adjacent to the Proposed Project due to the large number of family homes, schools, children, and senior citizens.

A variety of comments discussed family members or community members that already suffer from chronic or debilitating illnesses and express concern over how increased EMF could affect these individuals. Two comments made specific reference to maximizing protection of children from EMF exposure at home and school. The health impact associated with potential exposure to EMF generated by the project has emerged as a significant community concern.

The Director of Long Range Planning for the Cajon Valley Union School District had concerns regarding the Proposed Project's compliance with requirements under the California Department of Education Code and the construction of transmission facilities near schools. The comment focused on the public's concern about EMF effects on human health and proximity of towers to schools and residential areas.

The City of Santee and City of San Diego also expressed concern that the EMF impact needs to be evaluated and mitigated as necessary to ensure no significant human health impacts. The City of Santee stated its strong concern against installing the Proposed Project on the side of the tower closest to residents, bringing transmission lines closer to established neighborhoods. The City requested that the DEIR provide adequate and substantive information on the health effects of EMF while also ensuring compliance with minimum setbacks from established and planned uses.

### Impacts to Property Values

Numerous public comments expressed concern regarding potential impacts the Proposed Project may have on their home property values, business values, and local tax revenues. The public concerns were that the Proposed Project would reduce the desirability of homes due to perceived health and safety hazards,



increased noise from the transmission lines, and reduced aesthetic appeal. Specific topics mentioned in comments included impacts to the real estate market and the ability to sell homes in areas impacted by the Proposed Project, and impacts to the tax base of San Diego County and the Cities of Santee and El Cajon.

## **Visual and Aesthetic Impacts**

The potential visual and aesthetic impacts of the Proposed Project were raised specifically in many comments from residents living in Santee and El Cajon, as well as staff representing the City of Santee, and the County of San Diego. Diminished views were frequently cited as one of many reasons the Proposed Project would reduce property values. Strong public concern exists due to the expressed visual and aesthetic issues with the existing transmission lines, a problem that would be exacerbated by the installation of the Proposed Project. The County of San Diego Department of Planning and Land Use also recommended that the EIR provide a supporting visual impact study that evaluates the potential impacts from the proposed project, as well as provides measures to mitigate the impacts to a less than significant level.

The City of Santee expressed concern that the new pole locations within the ROW, between Los Coches Substation and Fanita Junction, would cause new significant visual impacts to the community, particularly in sensitive hillside areas and future protected habitat preserve areas.

## **Operational Noise Impacts**

Several verbal and written comments stated that the existing overhead transmission line was already causing substantial noise, characterized as a buzzing or crackling noise (i.e., corona noise). Residents living near the existing line expressed concerns that the noise from the proposed overhead 230 kV line would add to the existing noise levels, which may cause significant noise impacts to nearby residents. Comments associated noise from the lines with increased perceptions of risk or danger and with the fear that the desirability of real estate will be decreased.

The County of San Diego Department of Planning and Land Use also recommended that the DEIR should analyze several issues related to noise, including:

- Generation of and exposure of persons to noise levels in excess of standards established by the County's Noise Ordinance, or applicable standards of other agencies;
- Generation of and exposure of persons to excessive ground-borne vibration or noise levels;
- Substantial temporary or episodic increases in ambient noise levels (also associated with construction impacts discussed below);
- Analysis of impacts from operational noise to birds and wildlife inhabiting coastal sage scrub habitat (refer to the section below on biological resources).

The City of Santee expressed concerns with noise associated with the use of helicopters during construction at the northern terminus of Magnolia Avenue and Carlton Hills Boulevard. The City would require SDG&E to comply with regulations described in Chapter 8.12 of the Santee Municipal Code (noise abatement and control) that establish appropriate construction times during daylight hours in an effort to minimize adverse effects associated with this activity.

## **Construction Impacts on the Human Environment**

Concerns regarding impacts from construction activities and associated traffic and access needs were presented by several residents, the County of San Diego, and a property management agency. Concerns for construction impacts overlap with concerns regarding noise levels, air pollution, impacts to biological resources, protection of water resources, impacts to cultural resources, public utilities, health and safety, and overall quality of life in the affected communities. One resident of Lakeside stated that the rock on his property is granitic in composition and that construction may pose problems for his home (impacts from vibration during construction). In total, the comments received asserted that the potentially adverse impacts, which may result during project construction, need to be identified, analyzed, avoided/minimized, and mitigated as necessary in the DEIR.

The City of Santee would be required to issue encroachment and grading permits to SDG&E for temporary or permanent access roads that lie outside of SDG&E's existing easement.

Padre Dam Municipal Water District requested that the design engineers for this project contact the District and provide draft designs for comment by District engineers prior to construction.

## **Safety Issues and Fire Risk**

The City of San Diego commented that a large portion of the Proposed Project route would traverse the former Camp Elliott site that was used during World War II for weapons training. As such, unexploded ordnance remains in the soil from previous military training operations ([http://www.dtsc.ca.gov/OMF/Camp\\_Elliott/CampElliott\\_PN.pdf](http://www.dtsc.ca.gov/OMF/Camp_Elliott/CampElliott_PN.pdf)). This 3,200 acres site is located approximately 12 miles northeast of downtown San Diego and west and northwest of the City of Santee, among gently rolling hills and very steep mountain slopes. Due to potential safety issues, the City of San Diego recommended that the DEIR should analyze impacts within this area. The City also recommends that a sweep for ordnance should be completed prior to commencement of any technical surveys and project construction in the area.

Four public comments raised concerns related to the risk of fire and other accidents. There was particular concern from residents of the City of Santee dealing with potential accidents such as electrocution, explosion (associated with local natural gas pipelines in crowded utility corridors), and fire. The location of overhead transmission lines within open fields and hillsides, which become dry during the summer months, increases the perceived risk that fires may occur. One citizen from Santee requested information on all safety hazards that potentially could be incurred after the new poles/towers are placed within 24 feet of the homes (especially along Easthaven Court). There was also an information request for safeguards and contingency plans in the event of an earthquake.

One resident of Santee expressed concern that installation of the project along hillsides could result in instability of the ground, creating risk that homes may slide downhill.

## **Impacts Related to Transportation and Traffic**

The County of San Diego Department of Planning and Land Use recommended that the DEIR should analyze potentially significant impacts from construction traffic including: the location of parking areas, road usage, traffic flow especially at intersections, property access, as well as cumulative impacts. The County of San Diego would be the agency responsible for issuing permits for construction traffic that would occur within County facilities.

## **Impacts to Utilities and Service Systems**

The County of San Diego Department of Planning and Land Use recommended that the DEIR identify if the Proposed Project would affect utility easements within County lands.

Otay Water District recommended that SDG&E work with the District's Engineering Public Services Division to discuss water facility plans, required approvals, and scheduling.

The Cajon Valley Union School District commented that construction along streets and linear ROWs could disrupt local and regional services provided by underground utilities.

## **Impacts to Existing Communication and Media Services**

The City of Santee recommended that the DEIR address potential effects the Proposed Project may have on radio reception, microwave and personal communication systems, and televisions, as appropriate.

## **Conflicts with Planned Land Uses**

Several local and regional government agencies requested evaluations of specific sections of the project to determine potential impacts the project could have on planned land uses.

The Marine Corps Air Station at Miramar submitted a comment that the Planning and Real Estate Division should be the first point of contact regarding the Proposed Project and access to lands under their jurisdiction. Before any meetings with Miramar, the Real Estate Division would need to review the project information and the existing easement agreement to determine if a Federal action is required.

The County of San Diego Department of Planning and Land Use expressed concern that the Proposed Project route could impact residential areas, parks, and commercial areas within unincorporated County lands. Analysis of potential impacts of the Proposed Project's impacts to businesses and communities, as well as appropriate mitigation, should be provided.

The City of San Diego expressed concerns related to possible conflicts the project may have with the regional Natural Community Conservation Plan (NCCP), and Habitat Conservation Plans (HCP), or other local ordinances protecting natural resources. The second concern was related to potential impacts on the Sycamore Landfill, a privately owned solid waste landfill facility. The City of San Diego Development Services Department is currently processing the Sycamore Landfill Master Plan, which proposes to expand the landfill's footprint and remove the existing SDG&E high transmission line easement within the landfill boundaries. The City of San Diego recommended that further coordination between CPUC/SDG&E and Sycamore Landfill should occur to determine just how the Proposed Project would affect the landfill facility.

The Padre Dam Municipal Water District is planning a new reservoir in the Lake Jennings area and requested additional information regarding the location of the transmission line upgrade within the City of Santee relative to Lake Jennings.

## Impacts to Recreational Areas and Open Space

The County of San Diego Department of Planning and Land Use commented that the Proposed Project may significantly impact recreational facilities and open space within unincorporated areas of the County. The County further requested that the direct, indirect, and cumulative impacts to these recreational areas be identified, analyzed, and avoided or mitigated as appropriate.

The County of San Diego also requested that SDG&E contact the County Department of Parks and Recreation to address access issues at Louis A. Stelzer County Park and Lake Jennings County Park.

The Padre Dam Municipal Water District (PDMWD) was concerned with actions that would occur specifically within Santee Lakes Regional Park, including areas accessed during construction activities. The PDMWD owns and operates the park. The PDMWD requested specific maps and plans for the project within the area of the Santee Lakes Regional Park and wherever the alignment falls within the PDMWD boundaries or crosses District facilities. The PDMWD would like to be notified and given the specific alignment at least for the portions within the District boundaries prior to the start of construction in order to comment on the impact to District operations and facilities.

The City of San Diego Planning Department, Development Services Department, and Park and Recreation Department expressed concern that the alignment of the proposed transmission line could impact open space that is managed by the City's Park and Recreation Department including a long swath through Mission Trails Regional Park. These areas also contain a variety of sensitive upland and wetland habitat types that support a host of sensitive flora and fauna (relevant to wildlife and plant resources discussed below).

## Impact to the Quality of Life

A majority of the public comments expressed concern that the Proposed Project would cause a substantial negative impact on the quality of life of residents living near the subject project.

## 2.3 Natural Environment Issues and Concerns

The comments from State organizations and from individuals expressed concerns with the potential impacts that the project may have on the natural environment, particularly impacts to plants, wildlife, and habitats. In addition, concerns were also raised on the project impacts to cultural resources, hydrology, and water quality.

## Impacts to Plant and Wildlife

The County of San Diego commented that potential impacts to all federal and State listed, protected, and special status species must be evaluated in the DEIR.

Public comments conveyed substantial concern for impacts to biological resources during construction and avoiding or minimizing adverse impacts. Two public comments expressed concern regarding impacts of the transmission facilities to golden eagles (*Aquila chrysaetos*) that inhabit the project area. The County of San Diego Department of Planning and Land Use expressed concern that noise generated by the Proposed Project may disturb avian communities inhabiting the coastal sage scrub habitat within or adjacent to project areas. The County requested that a brief analysis and discussion of these impacts be provided in the DEIR.

## Impacts to Habitats

The County of San Diego raised concerns about potential impacts of the following: (1) construction access and activities (noise, habitat loss, habitat degradation) within or near coastal sage scrub communities, and (2) construction access issues at Louis A. Stelzer County Park and Lake Jennings County Park. The project Applicant may need to coordinate with staff to obtain a ROW permit on park lands that will require adequate mitigation measures to minimize and eliminate adverse impacts to park lands.

Comments received from the County of San Diego Planning and Land Use Department highlighted several issues:

- The Proposed Project may disturb wetlands, lakes, streams, or waters of the United States. SDG&E must notify the California Department of Fish and Game (CDFG) and the U.S. Army Corps of Engineers (ACOE) to begin project review and permit processing;
- The DEIR should discuss potential impacts to all listed, candidate, and special status species under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) and CDFG;
- The DEIR should discuss potential conflicts with regional Habitat Conservation Plans and Natural Community Conservation Plans or other approved or pending local, regional, or state habitat conservation plans, policies, or ordinances;
- The project should ensure that it does not conflict with the San Diego County Multiple Species Conservation Program (MSCP) Subarea Plan, particularly throughout the southern portion of the proposed route. Any impacts must be mitigated to less than significant levels; and
- According to the County's jurisdiction as a responsible agency, NCCP 4(d) Findings shall be required if coastal sage scrub habitat is impacted within County lands that lie outside of the MSCP area. The Proposed Project would need to make all of the required NCCP 4(d) Findings prior to approval of the earliest discretionary permit associated with the Proposed Project. Simultaneous with issuance of grading, improvement, and grading permits, a Habitat Loss Permit (HLP) will be required for all project areas containing coastal sage scrub. The HLP will be based upon the NCCP 4(d) Findings.

The City of San Diego requested that SDG&E carefully address the following concerns and recommendations in the DEIR:

- SDG&E should utilize the City of San Diego Biological Review Reference, dated July 2002, in conducting any biological surveys, determining impact significance, and establishing appropriate mitigation for biological impacts that may occur within the City's boundary.
- The City indicated concern that approximately half of Subsection F (illustrated in Figure 1-5, SDG&E PEA, July 2003) would be located within the City of San Diego's Multi-habitat Planning Area (MHPA), which was established by the City's Multiple Species Conservation Program. The MHPA delineates core biological resource areas and corridors targeted for conservation and within the MHPA, only limited development may occur. Even though much of the Proposed Project would occur within existing ROW, there may be areas where encroachment into City MHPA land may occur. The City referred to the City's MSCP Subarea Plan, March 1997, Section 1.4.1 Compatible Land Uses, Roads, and Utilities - Construction and Maintenance Policies (pages 44 and 45) for guidance on the development of the Proposed Project. Furthermore, Section 1.4.3 Land Use Guidelines of the MSCP Subarea Plan provides guidance for projects that would be located adjacent to the MHPA. This section stresses the consideration of good planning principles when developing adjacent to the MHPA, especially in regards to drainage, toxics, lighting, noise, barriers, invasive plant species, brush management and grading/land development.
- The City of San Diego recommended that the CPUC and SDG&E coordinate with the City's MSCP staff in determining the specific effects of this project on the MHPA.

As discussed in the Recreation and Open Space section above, the City of San Diego expressed concern that the proposed transmission line could impact areas within Mission Trails Regional Park, which contains a variety of sensitive upland and wetland habitat types and associated flora and fauna.

## **Impacts to Cultural and Paleontological Resources**

The County of San Diego Department of Planning and Land Use provided several comments related to cultural and paleontological resources within unincorporated County lands including:

- The DEIR should identify locations that contain known or suspected significant cultural resources;
- The DEIR should analyze impacts of the Proposed Project on historical and archeological resources per requirements of State CEQA Guidelines (Section 15064.5); and
- A field survey for archeological features and artifacts should be performed by a certified archaeologist using Archaeological Resource Management Report guidelines and queries of databases such as the South Coast Information Center at San Diego State and Museum of Man.

The City of San Diego also asserted that the Proposed Project has the potential to impact known and/or unknown historical resources on, or adjacent to, the project alignment. For project areas affected within the City of San Diego, the City requests that SDG&E utilize the City's Land Development Code Historical Resources Guidelines, amended April 2001, for preserving, avoiding, and mitigating historic resources.

## **Impacts to Hydrology and Water Quality**

The County of San Diego Department of Planning and Land Use commented that the DEIR should provide maps of hydrologic features (e.g., 100-year flood boundaries, hydrologic basins) and water resources (e.g., reservoirs, rivers) within the County. The County further requested that the DEIR should include the following:

- Analysis of the Proposed Project's impact to surface drainage patterns, cause erosion, siltation, or flooding and impacts to storm water drainage systems;
- Determine if the project will affect water quality under the Clean Water Act via discharge, by increasing loads into impaired water bodies, exceedance of applicable surface or groundwater quality standards, and otherwise impacting beneficial water uses.

## **2.4 Alternatives**

Comments from individuals, non-profit organizations, and government agencies suggested a variety of alternatives, including the No Project Alternative, demand reduction, alternative tower designs, and alternative routes. Section 2.4.1 presents a summary of alternatives suggested, and Section 2.4.2 lists the alternatives suggested by each commenter.

### **2.4.1 Summary of Alternatives Issues**

The following text summarizes comments on alternatives.

## **No Project Alternative**

Several members of local communities requested careful consideration of the No Project Alternative. The recommendations stemmed from questions surrounding the necessity of the project, impacts to human health, and the overall quality of life in the affected communities.

## **Alternative Tower Designs**

Several comments suggested that alternative tower designs that would reduce EMF levels should be investigated, such as grouping wires or shifting the location of wires to certain sides of towers/poles. Other suggestions included using the most visually pleasing poles available, painting poles brown or with a subtle and harmonious color, and the use of only existing towers as much as possible. These alternatives were put forth in an effort to minimize visual and aesthetic impacts on the environment.

## **Alternative Routes**

Some comments from government agencies and almost all comments from organizations and individuals expressed preferences for alternative routes. The most frequently discussed alternatives included a complete underground route, or a route that was partially underground at locations close to certain neighborhoods or cities. Modifications to above ground routes were also suggested, including the avoidance of additional or new poles; increasing distance between new towers and homes and schools; or changing the proposed tower locations (side of the street, elevation) to avoid causing impacts to sensitive receptors. Suggestions for alternative routes are detailed in Section 2.4.2.

## **2.4.2 Alternatives Suggested**

The following section provides a record of written and oral comments on suggested public alternatives by agencies, organizations, and members of the public.

### **Government Agency Suggestions**

The City of Santee recommended that the DEIR should evaluate the installation of the transmission line underground as a project alternative to avoid impacts associated with EMF, noise, land use, visual, and construction impacts.

The City of Santee also recommended that new poles, within the ROW between Los Coches Substation and Fanita Junction, should be placed adjacent to existing structures span for span rather than creating additional intervening locations for new poles. This strategy would prevent the introduction of new structures that would create new visual impacts to the community, especially sensitive hillside areas and future protected habitat preserve areas.

### **Private Organization and Company Suggestions**

The *Santee Citizens for Safe Power* organization provided a packet containing 36 comment letters recommending the maximum setback distances for the Proposed Project, as required by the State of California, the California Department of Education and as recommended by the World Health Organization.

## **Private Citizen Suggestions**

### ***Sal R. Campos (City of Santee)***

- The poles should be moved farther away from homes.
- Examine possibility of moving the poles to the north side of the existing structures.

### ***Matt DePhilipis (City of Santee)***

- Please investigate burying the lines.

### ***Jim and Sharon Ford (El Cajon)***

- If the lines could be consolidated to a tighter grouping to occupy less space, I believe they would not look as obtrusive when more lines are added. We live on Shadow Mountain and our view is to the west.

### ***Joe Garofalo (City of Santee)***

- What alternatives to the currently Proposed Project are available to remove or lessen the burden and potential hazards to the residents of Easthaven Court?

### ***Donna Hackney (City of El Cajon)***

- New towers should and could be placed at a lower elevation, below existing homes in the section running through El Cajon.
- Ms. Hackney believes that with proper planning and diligence, SDG&E can bury the proposed 230 kV transmission lines between Cottonwood Subdivision and Willow Glen Road and completely eliminate the towers presently visible, which degrades the visual quality of the area. Ms. Hackney also suggests that burying the lines may also correct the problems of noise and EMF exposure.

### ***Ellen Holoway (City of Santee)***

- What would it take to put the poles on the north side of the ROW in Santee?

### ***Rory and Ruth Jones (City of El Cajon)***

- Is it possible to put the necessary equipment on the existing towers, on only one tower?

### ***Mitch Joplin (City of El Cajon)***

- Please use the most aesthetically appealing poles.

### ***David Kramer (City of Santee)***

- What alternatives to the currently Proposed Project are available to remove or lessen the burden and potential hazards to the residents of Easthaven Court?

### ***Jim Radice (City of El Cajon)***

- Suggest the color brown to blend in with the background.
- Prefers no new poles be investigated as an alternative.

### ***Glenn Urie (City of Santee)***

- Installation of all new utilities should be underground.



## 2.5 Environmental Review and Decision Making Process

A few suggestions and comments were made regarding the adequacy of the environmental review and decision-making process. Individuals and agencies addressed the following issues:

- Comments were made questioning the efficacy of the CPUC's review and the fairness and completeness of the environmental review process in general.
- A strong majority of the public comments emphasized the need for the DEIR to provide full disclosure of human health risk and felt that this had not been provided thus far.
- Public and agency comments stated a need for a full evaluation of the Project Alternatives in the DEIR.
- The City of Santee recommended that because the project could take up to two years to complete, SDG&E should establish a public relations program to inform residents about the project schedule, construction schedule, and what to expect in the way of noise, traffic, and helicopter activities, as appropriate.
- The City of Santee has requested a copy of the Scoping Report and copies of comment letters.