

PUBLIC SCOPING REPORT

**SAN DIEGO GAS AND ELECTRIC COMPANY
VALLEY-RAINBOW 500 KV INTERCONNECT PROJECT
CPCN APPLICATION NO. 01-03-036**

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SECTION 1.0

OVERVIEW OF PUBLIC SCOPING PROCESS

1.1 INTRODUCTION

The California Public Utilities Commission (CPUC) and the Bureau of Land Management (BLM) are in the process of evaluating San Diego Gas and Electric Company's (SDG&E) application to build and operate the Valley to Rainbow Interconnect Project (Application No. 01-03-036) in northern San Diego and western Riverside Counties. The purpose of this public scoping report is to document the process and findings of the public scoping meetings and written comments received during the formal public scoping process.

If approved by the CPUC and BLM, SDG&E's proposed Valley-Rainbow Interconnect Project would make a number of improvements and additions to their transmission system and substation facilities including the following:

- **500kV Transmission Line.** A new single-circuit 500kV transmission line would be constructed between a new SDG&E Rainbow Substation and Southern California Edison's (SCE's) existing Valley Substation.
- **New Rainbow Substation.** A new 500kV/230kV/69kV substation would be constructed in northern San Diego County to interconnect the new 500kV transmission line with SDG&E's existing 230kV and 69kV transmission systems.
- **Valley Substation Modifications.** SCE's existing Valley Substation would be modified to accommodate the new 500kV transmission line from the Rainbow Substation.
- **Talega-Escondido 230kV Transmission Line Upgrade.** The existing 230kV line was originally licensed and constructed using double-circuit structures with only one circuit installed. The proposed project would entail adding the second 230kV circuit on the existing transmission structures and modifying the existing substations at Talega and Escondido.
- **Rebuild of 69kV Transmission Line.** A 7.7 mile section of the existing 69kV transmission circuit, presently installed on one side of the existing double-circuit Talega-Escondido 230kV transmission line structures and interconnecting SDG&E's existing Pala and Lilac substations, would be rebuilt

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on new 69kV structures. The 7.7 mile 69kV line would be supported on wood and steel pole structures that would be located adjacent to the existing Talega-Escondido 230kV line, and would be within the existing 300-foot wide right-of-way.

The CPUC has determined that the application is subject to review under the California Environmental Quality Act (CEQA). The CPUC is the lead agency for CEQA compliance, and is preparing an Environmental Impact Report (EIR) to analyze the potential environmental effects of the project and to identify alternatives and mitigation measures. Concurrently, the BLM has determined that the application is subject to the requirements of the National Environmental Policy Act (NEPA). The BLM is serving as the lead federal agency for NEPA compliance and the preparation of the EIS. Under a signed Memorandum of Understanding (MOU) between the CPUC and BLM, a joint EIR/EIS will be prepared.

1.2 PUBLIC SCOPING FOR THE VALLEY TO RAINBOW INTERCONNECT PROJECT

In compliance with CEQA Guidelines, a Notice of Completion and Notice of Preparation (NOP) was prepared by the CPUC and mailed to recipients on June 27, 2001. The formal CEQA scoping process provides an opportunity for governmental agencies and the public to provide comments on the issues and scope of the EIS/EIR.¹ The review period on the NOP officially extended from June 30 to July 31, 2001, although the CPUC agreed to receive comments up to August 7th if requested. Written comments received during the scoping process are part of the project record and have been reviewed and will be considered by the CPUC and BLM in scoping the EIR/EIS.

In addition to the formal scoping process, the CPUC and the BLM held three scoping meetings in July 2001 to provide the public and governmental agencies information on the CEQA and NEPA process and to give them opportunities to identify environmental issues and alternatives for consideration in the EIR/EIS.

The public scoping meetings were held on the following dates and locations:

- July 10 – Temecula Community Recreational Center, 6:00 to 10:00 p.m., 30875 Rancho Vista Road, Temecula, California

¹ The NEPA scoping process includes publication of a Notice of Intent (NOI) in the Federal Register. The BLM will publish the NOI in the near future. Public meetings held for the project in July 2001 will serve as both NEPA and CEQA scoping meetings.

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- July 11 – Winchester Elementary School, 6:00 to 9:00 p.m., 28751 Winchester Road, Winchester, California
- July 12 – Pauma Valley Community Center, 6:00 to 9:00 p.m., 16658 Highway 76, Pauma Valley, California

The agenda for the public scoping meetings is enclosed in APPENDIX A. APPENDIX A also contains the overheads prepared by representatives of the CPUC, BLM and Dudek and Associates who presented information on the CPUC and BLM environmental review and permitting processes.

Over 200 letters were received during the NOP public scoping process from public agencies and private citizens. Over 400 persons attended the scoping meetings. The input received from the NEPA/CEQA scoping processes will assist the CPUC and BLM in identifying the range of actions, alternatives, issues and potential effects associated with the proposed project. All issues raised in the scoping meetings will be reviewed by the CPUC, BLM and the environmental team to determine the appropriate consideration and level of analysis.

1.3 PUBLIC NOTIFICATION

Public notification for the scoping meetings included newspaper announcements and notification flyers. Notices for the public scoping meetings were published in the San Diego Union-Tribune and Riverside Press Enterprise on June 29, 2001. In addition, notification flyers were sent to over 3,000 stakeholders on the mailing list, including homeowners, residents, Native American groups, private organizations and interest groups. The notification list included all property owners within 300 feet of the project facilities. Copies of the NOP were also placed in public libraries for review including the Temecula, Sun City, San Clemente, Fallbrook, Escondido, and Chula Vista public libraries. Appendix A contains copies of the notification materials and mailing list.

1.4 AGENCY NOTIFICATION

The NOP was sent to potentially affected federal, state and local trustee and responsible agencies. Distribution of the NOP included nine federal agencies, 27 state agencies, 12 county departments, eight city departments, and eight special districts (see APPENDIX A for mailing list).

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The Notice of Preparation was also available on the CPUC's environmental web site for the project: <http://www.cpuc.ca.gov/divisions/energy/Environmental/info/DUDEK/valleyrainbow.htm>. APPENDIX A contains the agency and public organization mailing list.

1.5 SCOPING REPORT ORGANIZATION

This public scoping report summarizes the comments and issues identified through the NOP scoping process and NEPA/CEQA scoping meetings.

- **Section 2** provides an overall summary of the comments and issues.
- **Appendix A** includes the scoping notification materials, including:
 - A-1: mailing list;
 - A-2: public notification;
 - A-3: NOP; and
 - A-4: scoping meeting materials (agenda, fact sheet, presentation)
- **Appendix B** provides a summary of public scoping comments, including:
 - B-1: sign-in sheets;
 - B-2: summary of verbal comments; and
 - B-3: summary of written comments
- **Appendix C** provides:
 - C-1: copies of all written letters received in response to the NOP; and
 - C-2: comment sheets received at the public scoping meetings
- **Appendix D** provides selected newspaper articles.

SECTION 2.0

SUMMARY OF PUBLIC COMMENTS

This section synthesizes the comments raised by the public and agencies during the scoping process for the Valley to Rainbow Interconnect Project EIR/EIS. This summary is based upon both written and oral comments that were received during the NOP review period, that officially extended from June 30th to July 31, 2001, and from the three scoping meetings held in the project area in July 2001. This summary is also based on all letters received after the public review period for the NOP and through August 2001.

Over 200 letters were received during the scoping process from federal and state agencies, local city and county government agencies, special districts, private and special interest groups and concerned public.

In addition to letters received, approximately 176 oral comments and written comment forms were received by the CPUC and BLM during the scoping meetings. The majority of comments were provided by private citizens, homeowners, and private organizations. In addition to private individuals, comments were received from the City of Temecula, City of Hemet, the Temecula Valley Unified School District, the Temecula Valley Winegrowers Association, the Save Southwest Riverside County, the Redhawk Homeowners Association, the Pechanga Indian Reservation and Helicopter Pilots of Southern California. Agencies commenting included: United States Fish and Wildlife Service (USFWS), California Department of Fish and Game (CDFG), California Regional Water Quality Control Board (RWQCB), Native American Heritage Commission, California Department of Transportation, Riverside County Flood Control and Water Conservation District, Elsinore Valley Municipal Water District, SDG&E, and Metropolitan Water District of Southern California. APPENDIX B contains a summary of all written and oral comments received. APPENDIX C contains all written comments received.

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

1. Environmental Issues and Concerns
2. Growth Inducement
3. Purpose and Need
4. Alternatives

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5. SDG&E's Noticing, Right-of-Way, and Construction/Maintenance Practices
6. CPUC/NEPA Environmental Review and Decision Making Processes

2.1 ENVIRONMENTAL ISSUES AND CONCERNS

The environmental issues raised during scoping almost exclusively concerned the potential effects of the proposed 500kV transmission line between the proposed Rainbow and Valley substation sites. Potential impacts of the new Rainbow substation were also raised. Little to no environmental comments were raised with respect to the potential effects of the expanded Valley Substation, the Talega-Escondido 230kV line, or the 69kV line rebuild.

The majority of public comments focused on the potential effect of the 500kV transmission line on the human environment, including among others, quality of life effects; visual and scenic impacts; impacts to the Temecula Wine Country and other agricultural operations; impacts to schools, residential communities, recreation areas, aviation and hot air ballooning; public health and safety; impacts to property values, tourism and the economic health of the region. Concerns regarding the potential impacts of the project to cultural resources, biological resources, air, noise, water, geology/soils, other public utilities, fire hazards as well as cumulative effects were also raised as public/agency concerns.

2.1.1 Human Environment Impacts

QUALITY OF LIFE

Many written letters and comments stated that the proposed 500kV transmission line between Valley and Rainbow substations would significantly impact the community character that residents currently enjoy. Quality of life attributes that would be impacted include, among others, the agricultural lifestyle, tourism economy, hot air ballooning, the Temecula Wine Country, the scenic quality of the area and noise levels. Several letters stated that the City of Temecula features balloons and wine country on the City seal, and that City flags show these images. These writers expressed that the character of the community would be adversely altered because the project would have permanent, significant adverse effects on these key aspects of the community.

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PROPERTY VALUES

Numerous written letters and comments expressed concern regarding the potential impact of the project on their property values and businesses. Specific topics mentioned included impacts to homes and people's ability to sell their homes, horse breeding operations, land values, and the overall real estate market. Property impacts to Redhawk, Temecula Valley and Winchester were specifically mentioned. Several letters stated that the EIR/EIS should include socioeconomic studies to project property devaluation resulting from project implementation along alternative routes, effects on tourism in Temecula area, economic effects of routing transmission lines through the proposed west side Diamond Valley recreation area, and economic effects on proposed, planned, and approved specific plans and other developments.

VISUAL/AESTHETICS

The potential visual and aesthetic impacts of the 500kV transmission line are a major public issue. Specific areas of concern include the Temecula wine country, the Redhawk Development, the Wolf Valley, residential areas with scenic vistas to the surrounding mountains and Lake Skinner (*e.g.*, the Lake Skinner Estates Property Owners Association). The public stated that scenic vistas and pristine views would be destroyed by the project, as well as one of the oldest trees in Temecula (an 800-year-old oak located at Pala and Pechanga Roads). Comments also noted that SDG&E's visual impact maps are incorrect near Anza Road, due to out of date land use maps.

Written comments stated that all of the proposed routes in Temecula would pass through Class A scenic quality area which includes the Wine Country east of Temecula. Also, the proposed project will erect towers/poles that will be equivalent to 15-20 story buildings. View impacts of the line of towers should be quantified relative to all properties in their view. It was stated that the project would have negative tiered economic effect due to visual impacts for a much greater distance than is presently being considered.

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TEMECULA WINE INDUSTRY AND AGRICULTURAL OPERATIONS

Comments and written letters stated that the proposed 500kV transmission line would impact the aesthetics of the wine country, the quality of visits, land values, the productivity of the vineyards, and would increase noise levels. Low level spraying of pesticides would not be possible with the large powerlines and towers. This is a critical issue to wine growers due to the damage to crops that the glassy-winged sharpshooter has caused in recent years. Aerial spraying is required to control this pest. Another comment also noted that the lines would impact almond and other fruit trees due to limitations on spraying.

Numerous letters were received from landowners and farmers stating that the proposed project would have a significant adverse impact on agricultural resources. The project runs through an area that farms: grapes, avocados, and other citrus fruit as the majority of crops and would also affect beekeepers. As some crop growers are organic, chemicals used in association with the proposed project could cause some farmers to lose this valuable status. Organic growers in project area could have their certification revoked for three years because of any entry by entities carrying non-organic materials, pests, and noxious weed seed in maintenance around the lines. Several letters expressed that the project would result in adverse and irreversible economic effect on regional agriculture and tourism. Over 270,000 tourists visit the Temecula Valley each year. Wine and fruit production in the Temecula Valley exceed \$126 million dollars. There are 13 wineries in Temecula with roughly 1,750 acres that sustain employment and the livelihood of hundreds of employees and their families.

COMMUNITIES AND RESIDENTIAL DEVELOPMENTS

The proposed project would impact a number of existing and planned communities including the City of Temecula, the Redhawk Community, the planned Morgan Hill Development, and the Oak Haven Estates, among others. The Redhawk Community currently has 1,600 homes, with a total of 3,000 planned. Public comments stated that SDG&E's proposed transmission line project would directly impact the Redhawk Community and would be inconsistent with the master plan, including conflicts with lands planned for a future high school and landscaping ordinances. Regarding planned land use, 1,126 homes are also planned by Highpointe Developers as part of the Morgan Hill development, a 478-acre parcel that was

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recently approved by Riverside County, near the City of Temecula. Public comments also indicated that a Napa/Sonoma Resort is planned (80 acres) near the project site, along with approximately 30 bed and breakfasts. The Oak Haven Estate Home Owners Association also stated they are opposed to the project due to health and property value impacts. The public expressed concern that the transmission line could have health effects on a large number of children. Issues and questions raised also included the relocation of families, environmental justice issues, and impacts to the nearby Dorland Mountain Arts Colony.

A number of comments noted inconsistencies and errors in SDG&E's maps and provided a map showing the location of existing homes in the project area, including the Temecula and Lake Skinner vicinity. Errors in SDG&E's application were also noted for the vicinity of Anza Road and the Temecula Valley.

Many letters stated that the placement of a project of this magnitude has no place in populated areas and would significantly impact existing and planned land uses. Public letters also expressed that SDG&E used maps of the project area from the 1970's in deciding the route's compatibility to existing land use, and that an accurate analysis of existing and planned residential, commercial and industrial developments not identified on project maps, would demonstrate the project's inconsistency with present land use as set out on adopted community plans.

Beginning at its southern end, the proposed line would run adjacent to or through both the proposed high school site in Temecula, and the alternative site for the school. It would then cut through extensive residential communities, passing within 200 feet of some homes. The line would cross a sports park planned by the City of Temecula, cross numerous horse farms, and transect the Temecula Valley's vineyard region. Farther north, the line would run through and along established, planned recreation and open space areas in the vicinity of Lake Skinner and the Diamond Valley Lake. The line would also cross the downwind approach to the French Valley Airport. The line would impact still more residential areas near its northern end. Written letters felt that the proposed project would not be compatible with these land uses.

Morgan Hill is one of many planned residential communities that would be impacted by the project. Morgan Hill is a 478-acre parcel of land in the unincorporated area of Riverside County. The letter from Highpoint Communities, Inc. (development company for Morgan

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Hill) stated that SDG&E assessed the Morgan Hill property as farmland, and not as a master planned community containing 1126 homes, two parks, and an elementary school in its economic analysis.

The written letter from Menifee Valley Ranch LLC states that the line as planned bisects the middle of a 1550 acre planned residential community (there is currently an approved specific plan on the property along the west side of Lindenberger, south of the railroad tracks in Menifee Valley Ranch LLC). There is an existing transmission line along the northerly side of Matthews Avenue and on the easterly side of Briggs Avenue. An alternative route is requested to continue down Matthews Avenue and then turn south on Briggs Avenue, parallel with the existing transmission line right-of-way. The public also stated that this project is not in accordance with California's historic concern for environmentally sound development.

HOT AIR BALLOONING

Written and oral comments were provided by several balloon operators. The proposed 500kV transmission line would pose significant safety impacts to the hot air balloonists. Areas suitable for hot air ballooning are limited and the Temecula Valley is unique due to the winds, rural character and lack of powerlines. Approximately 250 balloon rides per year are provided in the area. Written information and an FAA publication were provided regarding powerline safety issues, and local cloud patterns, balloon locations and movements. One comment indicated that statistics show that 90% of balloon fatalities are caused by line strikes. The effects on the hot air ballooning business would have impacts on the economy and tourism of the area. Maps were provided that show the areas suitable for ballooning within the valley.

IMPACTS TO AVIATION AND SAFETY

Impacts to private, public, and commercial air operations including air traffic to and from the French Valley Airport as well as wild land area fire-fighting operations were noted. The proposed 500kV transmission line would be located less than two miles west of the French Valley Airport. The French Valley Airport is used for a helicopter flight school and for helicopter operations necessary for extinguishing brush wildfires. Due to prevailing wind

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conditions, helicopters ascend to the west, and would need to pass over the 500kV powerline. Vail Lake and other nearby bodies of water have been used as water sources for aerial fire-fighting efforts, including the major Pechanga fire in 2000. Comments also indicated that the mesa located northwest of French Valley Airport is the most common area for clouds to break, and the 500kV transmission line would often be covered by clouds due to local meteorological conditions. The transmission line would cause pilots to fly into clouds.

The Helicopters Pilots of Southern California provided written comments signed by 14 pilots and instructors. The French Valley Airport is home to the U.S.A. Academy of Aviation, a full-time certified helicopter flight school. The pilots believe the proposed 500kV transmission line presents a significant safety hazard to helicopter operations and training exercises. Another public comment noted that 15% of helicopter accidents are caused by wire strikes and wire strikes are the leading cause of death among helicopter pilots. Comments also noted that the frequency or density of airport operations is expected to increase over time, which would make the transmission line an even greater hazard than it would be today.

Secondary impact concerns include potential effects to fire protection resulting from increased travel time from alternative airports. Fire/safety hazards are considered high in southwest Riverside County. The potential for 'flashovers' as a cause of fire and injury was also raised.

A comment also provided an FAA publication regarding the risks of transmission lines and a map showing where the 500kV line would pose an obstruction in air space. Another comment indicated that 911 emergency access to victims would also be affected, since helicopters would not be able to land near the lines, or would be affected by the airport's take-off limitations.

Public letters also expressed concern over the general hazard that the proposed project would pose to parachuting.

PUBLIC HEALTH AND EMF

A number of comments and letter writers were concerned about the health effects of the 500kV transmission line. Comments, questions and concerns included the potential impacts to children from EMF exposure, potential for electrocution from non-grounded play

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equipment in parks, potential for increased leukemia, breast cancer and other cancers, potential effects on pacemakers, cellular and portable phones, shock risks to humans and to horses with metal shoes in wet weather, radiation effects on horses and cattle; soil, and air, health effects of corona ions, EMF effects on bees (including decreases in bee pollination and increased aggravation leading to stinging of horses). Comments requested that more research be conducted, and environmental studies should provide information on exposure levels at various distances from the line. A study up to 3 miles from the corridor was requested. Comments believe that the project area may be especially susceptible to EMF effects due to a large number of sensitive receptors in the Temecula Valley. Comments also noted that smoke and soot from fires and local fog conditions could increase EMF risks. Comments asked what level of risks are acceptable to the CPUC, and what is a safe distance to live adjacent to the line and towers?

Letters from private individuals stated that the EIR/EIS should model the EMFs associated with the line under the worst-case voltage scenarios. Diagrams were requested in writing to show extension of EMFs outside of the right-of-way and show the strength of the electric and magnetic fields at varying levels down to and including one milligauss (mG), in addition to showing the existing land uses in EMF-impacted areas.

Written letters also noted that the project will be in the direct vicinity of the Sports Park in Temecula. The health impacts associated with potential exposure to the electro and magnetic field generated by this major project are a significant community concern. Significantly, the PEA assessed magnetic field strengths at the edge of the rights of way, but did not do so for magnetic field exposure over residential and commercial area. The PEA failed to indicate approximate distances to existing residences along the planned route and the anticipated electric and magnetic field levels at affected residences. Writers believe that without this information, it is not possible to evaluate whether a particular design is effective and efficient in reducing electro and magnetic exposure on adjacent residential properties or if the reduction in fields at the edge of the right of way occurs with little impact on residential exposures to magnetic fields.

FIRE RISKS

A number of letter writers and comments expressed concern regarding the transmission line potentially causing fires, and/or the transmission line impacting fire fighters' ability to get

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to other wildfires in the area. Issues include the potential for the transmission line to cause fires due to falling over (*e.g.*, in seismic events), lightning strikes, flashovers, trees falling into the lines, etc.

With respect to the lines affecting wildfire management, comments noted that the area is prone to fires due to the predominance of brush and coastal sage scrub and nearby National Forest lands. The line would also impact the ability of the Lake Skinner (French Valley) airport in being used for fire protection operations (see aviation safety discussion above).

It was also written that the proposed line would interfere with the Forestry Department's use of helicopters at Lake Skinner for water to fight brush fires. The project is located in a populated area; it was stated that the need for fire protection is essential to protect homes and lives, and that putting this project in an unpopulated area would avoid increased risk of injury and death due to fire. It was requested that the Forestry Department should be consulted during preparation of the EIR/EIS.

SCHOOLS

The proposed route (Route B) passes near the Redhawk High School Alternative Site # 3 and through a major portion of the Denha High School # 3 site. Questions regarding whether the 350-foot minimum separation between schools and 500kV lines would be met at the Redhawk School site, as well as concerns regarding students needing to pass under the 500kV lines to and from school each day. Regarding the Denha High School site, the line appears to run through this site. Secondary impacts would result from having to find alternative school sites, including increased traffic and adverse impacts on the quality of education in the Temecula area.

RECREATION

Impacts to Diamond Valley Lake and Recreation Areas were raised by several members of the public as well as the Metropolitan Water district of Southern California. Comments that the EIR study the impacts to the Diamond Valley Lake Recreation Area and the related fiscal impacts to the Hemet/Winchester area. The local community has been counting on this recreation area to help the area financially as well as provide recreation opportunities.

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The City of Temecula also raised the issue of the impacts of the project to a planned city sports park at the southern end of the new Wolf Creek Development. The proposed alignment would bisect this piece of land that is undeveloped, but planned for future city uses. This parcel is adjacent to the City's proposed high school site.

Written comments requested that the environmental review process assess the project's impact on one of the area's premier annual events, the *Temecula Valley Balloon and Wine Festival*.

NOISE

A number of the written letters and comments expressed concern regarding the potential impacts of the transmission line (*e.g.*, buzz) on the ambient noise levels near the project right-of-way. A noise impact analysis study was requested for both humans and animals.

CULTURAL RESOURCES

Several comments were concerned about the project's impacts on historic and archaeological sites, and resources important to Native Americans. A request was made to contact the Native American Heritage Commission for a Sacred Lands File Check, a list of appropriate Native American contacts for consultation concerning the project site and assist in the mitigation measures.

Pechanga Cultural Resources Center sent a letter stating that they believe the proposed project will substantially impact Luiseño Indian cultural and natural resources as well as tribally owned lands. An archaeological survey is requested of the project area and adjacent properties that will be impacted by the proposed project.

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PECHANGA INDIAN RESERVATION

A letter from the Pechanga Band of Luiseño Mission Indians stated that consent must be given to have access to their lands in order to conduct a thorough environmental study. They state that without assessing the lands on the reservation, the EIR/EIS would not be complete. The Nation of the Pechanga Band of Luiseño Mission Indians (Nation) has not given its consent for the proposed route of the project through the Pechanga Indian Reservation. Neither has the Nation consented nor agreed to participate in an EIR/EIS process with respect to Reservation lands. The letter states that the BLM must not engage in the EIR/EIS regarding the Reservation without the prior consent of the Nation, and to do so would constitute a violation of the sovereign authority of the Nation and the trust responsibilities of the federal government toward the Nation.

PUBLIC UTILITIES

The Metropolitan Water District at Southern California (Metropolitan) expressed significant concerns regarding project impacts to Metropolitan facilities including: the west end of the Diamond Valley lake Dam, San Diego Canal, Lake Skinner and Pipeline Number 6. Metropolitan also expressed concerns over Metropolitan's projects including impacts to ecological reserve set aside surrounding Lake Skinner and Diamond Valley Lake as well as planned mixed-use recreational adjacent to the west and east dams at Diamond Valley Lake.

The Riverside County Flood Control and Water Conservation District also expressed potential conflicts with their facilities.

2.1.2 Natural Environment Issues

SEISMICITY, SOIL, AND WATER CONSTRAINTS

A number of written and oral comments addressed a variety of natural resource concerns including the potential impact of seismicity, liquefaction, and the stability of the poles/towers in areas susceptible to floods and soils with high erosion potential.

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Specific comments were that the water table in Wolf Valley is very high and soils are especially susceptible to erosion. The potential for liquefaction exists in the Wolf Valley due to the presence of soft sandy soils and very high earthquake ground motion potential. A water table evaluation is needed since there is a large aquifer located in the project vicinity. Seismic activities have occurred (e.g., the 1899 earthquake that measured 6.4 on the Richter scale). Earthquakes could result in towers falling, and a fault hazard evaluation is requested. Streambed assessments are needed. The project may be located within the 100-year flood zone. Floods could cause towers to collapse. In addition to Wolf Valley, potentially sensitive areas identified during scoping meetings include the Temecula Valley and Creek, and the Nicholas Valley. Comments also expressed concern about the stability of the 'designer' single poles versus the more stable lattice towers. Flooding has also been a problem at Anza Road (1989 flood). Seismic hazards exist in the Wolf Valley due to faults, liquefaction, and floodplains (a map was submitted).

There were many written inquiries as to what measures would be incorporated to ensure that, in the event of seismic activity, the structures as proposed can be controlled so as to eliminate potential for sparking fires as the project is located in a very high fire hazard area. In addition, 'swing and fall' are major concerns-, e.g., a 200-foot tower falls in a 170-foot right-of-way, it will fall out of bounds.

Impacts of drilling or blasting on existing fissure and fracture wells relied on by virtually all rural and semi-rural residents in the entire Menifee Valley area was a concern that was submitted in writing by the Antelope-Menifee Rural Center. In the experience of the Antelope-Menifee Rural Center, even slight changes in rock fracture structure have enormous effects on wells in existing pockets of water accumulation. The Antelope-Menifee Rural Center feels that further study is required, and that mitigation measures must be identified and in place should construction affect changes in underground rock structure and water well production. Also, the project is directly in the path of the newly constructed earthen dam at Diamond Valley Lake. Potential flooding and/or mudflows which could be associated with dam failure at this location should be addressed.

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BIOLOGICAL RESOURCES

Biological resource issues raised particularly concern over the potential impacts of the proposed project (temporary and permanent) on federally-listed, proposed, and candidate species and the project's potential to have a substantial adverse effect on the quality of the environment, significantly reducing the habitat of fish or wildlife species. Additional comments included addressing potential collision hazards to migratory waterfowl, swallows and raptors. Spring surveys of all endangered species were requested.

Letters were received stating concern over the project's impact to the proposed Multi-Species Habitat Conservation Plan (MSHCP). It was felt that the MSHCP has been the recipient of enormous amounts of taxpayer money, considerable citizen voluntary contribution of time and nationwide focus of attention to create a unique plan to benefit endangered and threatened species.

Additional specific comments included the following:

- Protocol-level surveys for all potentially-occurring listed, proposed, candidate or otherwise sensitive species need to be conducted.
- Project effects on Stephens' kangaroo rat HCP; critical habitat for Quino, California gnatcatcher, arroyo toad, and least Bell's vireo; Quino recovery; BLM parcels; and fluvial processes.
- Substation selection relative to wetlands impacts necessary for the Rainbow site and selection of alternative absent the results of focused surveys for sensitive species.
- Noise effects from helicopter use/transmission tower effects on sensitive birds.
- Indicate concerns that Alternative E may not, even with Pechanga Tribe concurrence, be the least environmentally damaging alternative as there would be increased effects on listed species.

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- Turn-around time for notification concurrence; request 60 days vs. 10 days. Protocol 17, which contains this time frame, should also deal with all plants deemed to be sensitive in the environmental review process, not just those "covered" under SDG&E's NCCP/HCP.
- Request differentiation between permanent and temporary effects and the duration of the temporary effects.
- In addition to mitigation required for impacts to oak woodland habitat types, there would be an additional mitigation measure to compensate for individual oaks and sycamores, dependent upon their size.
- All plant species contained in Lists 1B and 2 (and some on List 3) of the California Native Plant Society's *Inventory of Rare and Endangered Plants of California* need full consideration in the environmental review process.
- Concern about brush clearing and noise impacts to birds during the breeding season. Provide measures to incorporate into the mitigation program to address this issue.
- Concern over the potential increase in non-native species within the project right-of-way.

CUMULATIVE IMPACTS/ENVIRONMENTAL JUSTICE

Cumulative impacts were noted by a number of public speakers from the Hemet and Winchester area as a major issue. In recent years, various infrastructure projects and mitigation sites (*e.g.*, Diamond Valley Reservoir, gas line, Pipeline 6) have been proposed and/or developed in southwest Riverside County that primarily benefit San Diego County and other surrounding communities. These developments have cumulatively affected the amount of developable land available in southwest Riverside County, as well as the desirability of the area for development. Impacts have included the County's and cities' tax revenues. Cumulative impact analysis was requested.

2.2 GROWTH INDUCEMENT

Written comments were received regarding how the project would facilitate the growth of local power generation and distribution projects including the ultimate buildout of the Talega-Escondido ROW as illustrated in SDG&E's PEA.

2.3 PURPOSE AND NEED

The purpose and need for the project was questioned by several comments, orally and in writing. Issues raised included:

- There is no need for import and/or export energy due to the number of power plants planned in San Diego County and other counties in Southern California.
- Whether the Valley-Rainbow Project is part of a larger project planned by SDG&E and Edison. Is the Valley-Rainbow Project, by itself, critical to the operation of the California grid? The ISO Grid Enhancement Study looked at the benefits of connecting the SDG&E and SCE bulk transmission systems for load growth and new generation access. The three different systems evaluated all entailed 500kV systems between the SDG&E Miguel Substation and SCE's Valley or Devers substations. Questions raised included whether the Valley to Rainbow project is the first phase of a larger project to connect to the Miguel Substation. If so, this presents 'Segmentation' problems with respect to CEQA and NEPA compliance.
- Is SDG&E's purpose and need based on outdated load forecasted data and outdated generation resource data?

2.4 ALTERNATIVES INCLUDING NO ACTION/PROJECT

Comments regarding alternatives ranged from the No Action/Project Alternative, alternative technologies and alternative routings and transmission system configurations. Specific alternatives suggested and related issues include:

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- The No Action/Project Alternative needs to receive careful consideration. Since the project was proposed by SDG&E, energy conditions in California have changed and rendered the project unnecessary from either an energy import/export perspective (see Purpose and Need issues raised).
- Upgrades to Increase the Transfer Capability of the Southern Portion of SDG&E's Transmission System (Southern System Improvements), entailing **(1)** upgrades to Path 45 and **(2)** upgrades to the existing transmission lines west of SDG&E's Miguel Substation.
- Talega-Escondido 230kV Line Upgrade. SDG&E could displace or at least delay any need for a new 500kV line like that proposed between Valley and Rainbow by focusing on the far less expensive and damaging improvements proposed for the 230kV Talega-Escondido line. The Talega-Escondido 230kV line upgrade should be evaluated as a stand-alone alternative and in combination with the above-described 'Southern System Improvements'.
- 230kV Interconnection of SDG&E's Miguel Substation with Imperial Irrigation District's 230kV Highline Substation ('Imperial Valley Line').
- Alternatives Involving the Installation of New Transmission Lines. Alternatives routed through less developed areas or along existing rights-of-way should be considered, including:
 - 1) A transmission line parallel to and west of SDG&E's proposed Valley-Rainbow Line ('Elsinore Line');
 - 2) Transmission line routes south of Devers, including a Devers-Ramona line; Devers-Miguel line, Devers-Imperial Valley line, Devers-Pala line;
 - 3) Transmission lines south of Serrano Substation, to Talega or SONGS.
- Non-wires Alternative. Evaluation of a non-wires alternative is particularly important in light of the new generation that is currently proposed, approved for the San Diego area, northern Mexico and Arizona.

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- Many letters expressed that a viable alternative is to route the project through the Cleveland National Forest including evaluation of the Nevada Hydro LEAPS project. However, one letter from a private individual stated that a route through the Cleveland National Forest was not possible. In the current Land and Resources Management Plan for the Cleveland National Forest section F, Forest-wide Standards and Guidelines Lands, sets the parameter for new projects within the forest. Paragraph 1 says, “*Consider new special use permits or easements only when suitable private land is not available and such use does not conflict with management objectives.*” The letter went on to say that private land is available to accomplish the project so the Forest Service must reject the project alternative that would impact these lands. Lake Elsinore Advanced Pumped Storage Oversight Committee (LEAPS OC) as well as the Lake Elsinore Municipal Water District expressed in writing that they were concerned that the LEAPS route might be included as an alternative in the EIR/EIS.
- Letters stated that the PEA failed to adequately address the possibility of undergrounding part or all of the line and dismissed this alternative as impracticable.
- The PEA briefly considers a second Southwest Powerlink (SWPL) from Palo Verde to Miguel along an existing right-of-way, but SDG&E summarily rejected this alternative due to its purportedly higher cost and greater length than the proposed project. Written comment also expressed that the PEA failed to recognize the significant costs associated with acquiring right-of-way in the Temecula area and the costly construction techniques necessary to accommodate existing land uses.
- One public letter expressed that a viable alternative would be along Highway 74, possibly down a median, and then south through some of the steeper, undeveloped areas and public lands. This would reduce or eliminate potential hazard to people of south Riverside County. It was expressed that the Highway 74 route should be chosen because it has less impacts to people than other routes.
- The median of the 215 and 15 freeways was also suggested as a preferred alternative. Letters expressed that since freeways are already a blight on the land, the visual and viticulture effects resulting from such an alternative would be less than the proposed route.

2.5 SDG&E'S NOTICING, RIGHT-OF-WAY, AND CONSTRUCTION/ MAINTENANCE PRACTICES

Issues raised during scoping included the following general concerns:

- SDG&E has sent letters to landowners indicating their intent to enter private property without landowner permission to conduct surveys. Does SDG&E have a right to trespass on private property since a decision has not been rendered?
- Landowners questioned whether the 'designer' single pole was stable and suitable for this part of California given the area's seismicity potential and soil and water conditions. A comparison of the benefits and potential costs/hazards of the towers and single poles was requested.
- Several questions were raised regarding SDG&E's maintenance practices. Would the poles and insulators need to be washed periodically and if so, would spray reach the nearby homes?

2.6 CPUC/BLM ENVIRONMENTAL REVIEW AND DECISION MAKING PROCESSES

The following comments were made regarding the adequacy of the CEQA/NEPA process:

- The CPUC and BLM are relying too much of the applicant's information. The BLM and CPUC are urged to conduct their own, fully independent environmental analysis of the proposed project.
- The lack of a stable project description in the NOP has important implications for the Commission's and BLM's environmental review process. NEPA and CEQA require that the environmental review document contain an accurate description of the entire project. The complete scope of the project's environmental impacts cannot be determined until the whole of the project is revealed. The viability of alternatives to the proposed line cannot be assessed without a stable project description against which to compare alternatives.

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- The NOP fails to provide a reasonable range of alternatives to the project. The EIR/EIS must not repeat SDG&E's mistake in the PEA of focusing on tweaks to the proposed route inside the Valley to the exclusion of strategic alternatives outside the Valley.
- Although additional alternatives were presented at the scoping meetings, parties that were not able to attend the scoping meetings have had no notice of the additional alternatives since they were not included in the NOP. Written comments stated that the NOP fails to provide the public with adequate notice of the scope of environmental review for the proposed project. Comments stated that landowners in the vicinity of the LEAPS project should have been noticed about the public meetings, as well as landowners along other alternatives still under consideration by the CPUC and BLM. Written comments noted that the NOP fails to make clear how the purpose and need for the proposed project will be evaluated or how the segmentation of the project will be addressed. The NOP also fails to provide a complete list or an adequate description of the alternatives that will be evaluated. Consequently, it is requested that the Commission and BLM prepare a supplemental scoping document and circulate it for review.
- Comments had also requested a time extension to provide written comments. Although the official comment period will end on July 31, 2001, the CPUC indicated that comments would be received until August 7th.

Appendix A

Notification and Scoping Meeting Materials

A-1

NOP Mailing List

A-2

Public Notice

Public Scoping Report

A-3

Notice of Preparation

A-4

Scoping Meeting Materials

Appendix B

Summary of Scoping Comments

B-1

Sign-In Sheets

B-2

Summary of Oral Comments

B-3

Summary of Written Comments

Appendix C

Written Comments

C-1

*Letters Received in Response
to Notice of Preparation*

C-2

*Comment Sheets Received
at Scoping Meetings*

Appendix D

Selected Newspaper Articles