



Comments on DEIR for A-14-04-011 Sycamore-Penasquitos 230KV Transmission Line.

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The Scripps Miramar Ranch Planning Group submits the attached comments on behalf of our planning group and the Mira Mesa Community Planning Group. Our planning group voted unanimously on November 5, 2015 to submit the attached comments.

We believe that insufficient public notice, analysis, and consultation with the community have occurred regarding Alternative 5. The DEIR with respect to Alternative 5 is substantively deficient and should be withdrawn, re-scoped with the new alternatives including new public scoping meetings and consultation with Community Planning Groups, rewritten with complete analyses, and reissued for public comment before it is approved. The CPUC's conclusion that Alternative 5 is Environmentally Superior should be withdrawn until scoping meetings and public discussions are held, complete engineering analyses are performed, and a complete and accurate Environmental Impact Report is available.

Respectfully Submitted,

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 **SycamorePenasquitosDEIRcomments.pdf**
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Comments on CPUC Draft Environmental Impact Report on:
San Diego Gas & Electric's Sycamore-Pensasquitos 230-KV
Transmission Line Project (A-14-04-011),
State Clearinghouse No. 2014081031

Prepared by: Scripps Miramar Ranch Planning Group
Mira Mesa Community Planning Group

Submitted: November 11, 2015

Introduction: The Scripps Miramar Ranch Planning Group (SRPG) and Mira Mesa Community Planning Group (MMCPG) are among the 42 Community Planning Groups chartered by the City of San Diego. The SRPG and MMCPG provide consultation and recommendations to the City, County, State, and other agencies regarding planning, land use, transportation and traffic, public safety and other issues for the city planning areas of Scripps Miramar Ranch / Rancho Encantada and Mira Mesa.

The SRPG and MMCPG have identified the following misstatements, inaccuracies, omissions, and insufficiencies in the Draft EIR.

Issue 1: Improper CPUC Conclusion with respect to Alternative 5.

ES.1.1: The CPUC's conclusion that Alternative 5 is Environmentally Superior is improper because the DEIR does not completely and accurately analyze environmental impacts, for the reasons stated below. The DEIR does not provide an accurate and complete basis for the CPUC's conclusion.

Issue 2: Insufficient Public Notice

ES 4.1.1: The Notice of Preparation did not mention Alternative 5.

ES 4.1.2: The public Scoping Meetings held on August 25-26, 2014 made no mention of Alternative 5.

ES 4.1.2: The Scoping Report and Appendices dated September 2014 and posted online made no mention of Alternative 5.

No public announcement regarding the proposal or consideration of Alternative 5 was made. It was first publicly mentioned in Data Request 8 on March 4, 2015 (but referred to as "Alternative 4"). This data request, however, was made only to SDG&E and not to any other interested parties including SRPG. The responses from SDG&E returned information to the CPUC but not to any other interested parties.

Additional information about Alternative 5 was requested by the CPUC in Data Request 10 on April 8, 2015, including specific information about EMF modelling. This is the first mention of it in the Public Record. The SDG&E response on April 21, 2015 is particularly enlightening: it essentially says, “this would take too long, and you don’t need it anyway.” Instead it recommends that the CPUC withhold such information from the public and from decision makers, arguing “there is no agreement among scientists that EMF creates a potential health risk and there are no adopted CEQA Standards for defining health risk from EMF.” Further, it recommends that “An EIR may instead conclude that no accepted methodology or standards exist to measure an impact, and such a finding may be upheld if supported by evidence and analysis showing that a reliable method for assessing an impact is not available.” The CPUC and SDG&E should present data and modelling results and let the public and decision makers evaluate it. Without this, the DEIR is incomplete, and potentially inaccurate in its conclusions and recommendations..

In Mira Mesa, many of the businesses along Miramar Road, Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road. seem not to have received notice. Owners of these businesses (not just property owners) should be allowed to review the alternative in detail. Lack of any response from business owners to date should be considered as prima facie evidence that the noticing process, though it may have been extensive, was not effective.

It is clear that there has been no real public involvement in the identification or evaluation of alternatives, because there was no opportunity prior to the DEIR release and Public Comment period. The 45-day comment period provided for review of the DEIR is not sufficient to allow careful analysis and consideration of new alternatives. Instead the NOP and Scoping process should have been re-opened to allow sufficient public awareness and input regarding alternatives which were not included in the original scoping process.

Issue 3: Incomplete Analyses of Alternative Impacts on Biological Resources:

Both ES.6.2.2(5) and all of section 4.1.13 omit any mention of the proximity of Carroll Creek, a federally designated wetland, which runs close to and immediately downhill from the south side of Pomerado Road. Construction would undoubtedly result in disturbance of this area and contamination with dust and construction debris. Over time, the installation of the underground line and massive splice vaults will also change hydrology of the creek and therefore affect its biology.

There is no mention in the DEIR of coordination with or feedback from any of the Federal agencies with jurisdiction over this area, such as the Army Corps of Engineers, the U.S. Fish and Wildlife Service and/or the Environmental Protection Agency about specific conditions along Pomerado Road. It appears that the engineering plans for

Alternative 5 are incomplete so that the exact routing for the line is unknown (see below). Until engineering is farther along, the DEIR cannot be considered complete.

Issue 4: Incomplete Analyses of Aesthetics:

ES.6.3.2(5) and Section 4.2.13 omit any mention of the installation of over 30 manhole covers along Pomerado Road and Stonebridge Parkway. Section 4.2.15 improperly concludes that “there is no lasting aesthetic impact from the underground transmission line.” Pomerado Road is a designated historic roadway – old US-395. Manholes and other pavement anomalies are unsightly and over time lead to discontinuities in the roadway which are both visually unappealing and a hazard to traffic.

ES.6.3.2(5) also omits any mention of the above-ground segment over I-15 although it is covered in section 4.2.13 where the aesthetic impact is improperly dismissed. This location is essentially the entrance to Scripps Ranch. This alternative would add visually unappealing towers, power lines, and marker balls in the most visible area of Scripps Ranch, in an area visible not only from I-15 but from many residences and businesses in Scripps Ranch.

Issue 5: Incomplete Analyses of Geology, Soils, and Mineral Resources:

The DEIR, Section 4.5.12 states: “...a geotechnical investigation has not been performed.... Alternative 5 Route is located near surface water resources (Carroll Canyon Creek) where shallow groundwater would be expected; therefore, it is assumed that these areas could be subject to lateral spreading or liquefaction.” Later it states that a geotechnical investigation is needed and that the results would be incorporated in the Final design. Since natural groundwater saturation due to the position of Pomerado Road near the bottom of Carroll Creek is inevitable, at this point, the DEIR is incomplete.

Issue 6: Incomplete Analyses of Hydrology and Water Resources:

ES.6.7.2(5) notes that the transmission line would be located in a 100-year floodplain, but the only impact mentioned is possible scour of the line. In addition, however, the line’s placement would impact water flow in and around Carroll Creek, a federally designated wetland, especially during heavy storm water periods (which incidentally occur much more frequently -- at least every 10 years).

Section 4.6.12 states “The underground alignment would cross Carroll Canyon Creek via existing roadway culverts. The underground duct bank construction and transmission line installation would not alter the course of a stream or river because it would be located in the existing roadway alignment above or below the stream channel.” This section is incorrect in several respects. First, there are only a few

existing roadway culverts along the Pomerado Road route depicted in Figure E.6, but these are not near the road crossing which is shown as new construction. Second, as discussed below, there is insufficient roadway width to safely construct the line and vaults (particularly MH11-13) within the existing Pomerado Road alignment, and if they are located south of the roadway, then installation will not be impervious in the existing alignment, but instead in the Carroll Creek area, a federally designated wetland, and a FEMA flood zone as shown in Figure 4.6-5

Issue 7: Incomplete and Inaccurate Analyses of Transportation and Traffic:

Pomerado Road is an arterial travel route for residents of Scripps Ranch and Rancho Encantada, as well as residents of Poway, Ramona, and other areas to the east. It is a designated historical route (US-395) and is a designated emergency evacuation route. It is currently at LOS F in both directions at peak (not E as claimed in the DEIR).

Scripps Ranch was affected by the 2003 Cedar Fire, to date the largest wildfire in California history, and was also evacuated in 2007 during the second largest California wildfire. Pomerado Road is a critical part of the evacuation plan approved by the San Diego Fire Safe Council, the City of San Diego Fire / Rescue Department and Homeland Security Department, and the San Diego City Council. It is the only exit for many residents on the south side of Scripps Ranch, and a main escape route for residents of Rancho Encantada, Poway, Ramona, and eastern parts of San Diego County. The approved evacuation plan requires three lanes of travel on Pomerado during an emergency. While the DEIR mentions that Pomerado Road has only two marked lanes, the pavement is barely wide enough for three traffic lanes, even including the bicycle lanes, in many areas. The Fire plan in Appendix I does not mention the possibility of evacuation. The DEIR fails to note that construction-caused disturbance of the traffic along this route, including the bicycle lanes, for a year or more would have an extremely negative impact on critical and life-saving evacuation. Interference with a major evacuation route is absolutely unacceptable.

At this point, there is insufficient information in the DEIR to judge the impact and adequacy of analysis. Appendix E contains detailed route maps for Alternative 5. Simple inspection of these maps, however, reveals that they were prepared with little knowledge of the area and little engineering analysis. For example, Figure E-6, maps 3 through 8 show a proposed route mostly along the south edge of Pomerado Road. There are several issues: First, a main wastewater line runs almost exactly along much of that path. Second, in many places along the route, there is a significant downslope. Several splice vaults (e.g. MH12, 13, 15, 16), because of their size, would either need to be located nearer to the center of the roadbed (leaving insufficient safe width for two traffic lanes), or would require shoring and major road reconstruction. Third, the DEIR makes no mention of the main San Diego County Water Authority aqueduct/pipeline which crosses Pomerado Road east of Scripps Ranch Blvd. Avoidance will require much more extensive excavation. In all cases, construction would take longer, and

result in much more traffic impact. Further, construction would be more likely to materially affect the federally designated wetland immediately below.

There is no analysis of the effect of construction on the I-15 interchanges and the daily backups that occur, and no analysis of the traffic impact on Marshall Middle School. Freeway on-ramp traffic is heavily affected in the morning by MMS, and off-ramp traffic and traffic along Pomerado Road is almost at a standstill during afternoon dismissal and into business rush hours.

In Mira Mesa, installation of the Transmission Line and Splice Vaults in Miramar Road immediately west of I-15 will result in unacceptable disruption to traffic in an area that is already at LOS F during AM and PM peak hours. In addition, the proposed routing through Mira Mesa, along Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road, will significantly affect traffic during peak hours. This will also significantly impact traffic to and from MCAS Miramar.

Operation of Alternative 5 will lead to continuing unacceptable disturbance of traffic on a designated emergency escape route. Pomerado Road will have at least 12 large splice vaults, and at least 24 new 36" manholes. Even if installed perfectly, manholes will distract drivers and lead to swerving or slowing. Missing or misplaced manhole covers will cause accidents and disrupt traffic. But typically and especially over time, the splice vaults and manholes will result in uneven pavement, more visual disturbance, and potholes, particularly in light of the City of San Diego's record on deferred street maintenance. This will result in additional disturbance to traffic, which, because the road is at LOS F already, is a significant and immitigable environmental impact.

Pomerado Road has a class 2 bicycle lane in each direction not separated from traffic. This is the first bicycle route that provides east-west connectivity north of SR-52, and it is a main segment from San Diego to the only north-south bicycle route to Poway, Escondido and other points north along the old US-395 corridor. There is no other continuous north-south bikeway near I-15. Construction of the transmission line will close this route for at least a year during construction, because there is not sufficient roadway width for traffic lanes.

Operation of Alternative 5 will lead to continuing disturbance of traffic as described above, and this will lead to unacceptable bicycle safety issues along the Pomerado corridor. This could be mitigated by installation of a Class 1 bicycle lane adjacent to Pomerado Road along with the proposed transmission line.

Section 4.7.13 fails to mention that the overhead portion of the transmission line across I-15 is immediately adjacent to Marine Corps Air Station Miramar in an airport influence area, and in a main military helicopter transit lane. While this section claims that compliance with FAA requirements will make the operational impact less than significant, this is unlikely due to proximity to the Air Station. Certification of compliance for this alternative should be obtained from the FAA before the EIR is finalized.

Section 4.7.13 also fails to mention that the I-15 overhead is within about ¼ mile of the Southern California Terminal Radar Approach Control Facility (TRACON), the FAA's air traffic control facility for all of Southern California, and is very near the Miramar MCAS. The TRACON serves most airports in Southern California and guides about 2.2 million aircraft over roughly 9,000 square miles in a year, making the facility one of the busiest in the world. The TRACON provides radar air traffic approach control services to all arriving and departing aircraft for most airports in Southern California. The TRACON's airspace covers an area from 20 miles north of Burbank to the US/Mexican border and from San Bernardino to Santa Catalina Island. Ongoing electrical and corona interference from operation of the overhead transmission line is likely to impact radio communications at both the TRACON and Miramar MCAS, and will therefore affect flight safety in all of Southern California. Certification from the FAA is required before the EIR is finalized.

Issue 8: Incomplete and inaccurate Analysis of Fires and Fuels Management.

ES-6.13.2(5): The analysis completely ignores the fire danger along Pomerado Rd, which at present is one of the most fire-prone areas in San Diego County. Large amounts of dry, overgrown, unmaintained brush and trees are within 10 to 20 feet of Pomerado Road immediately adjacent to the route shown in the maps in Figure E-6. The fire danger is already under study by the Fire Safe Council, the San Diego City Council, County Supervisor, our State Assembly Member, and our Member of Congress.

The Fire Plan in Appendix I makes no mention of how to accommodate a major fire, or a mandatory evacuation, such as those that have been ordered twice in the last 12 years. Pomerado Road is a designated evacuation route, not only for Scripps Ranch, but for Rancho Encantada, Poway, Ramona and other northeast county residents.

Issue 9: Incomplete Analysis of Health and Public Safety.

There should be a separate health and public safety analysis for the Pomerado Road evacuation route resulting from anything that would impact the free flow of traffic. This would be especially true at night when there may be construction crews and trucks in place (Construction might be done at night to avoid impact in the day traffic). Combine construction crews, changed traffic work-arounds, and darkness in an emergency to aggravate the evacuation issue. The heavy traffic (already observed during previous evacuations) would be made substantially worse by any construction during fire / smoke conditions which would result in high impact effects on breathing / pulmonary / heart conditions as well as asthma, allergies, and any stress related illness. Worse, any construction that would force a re-directed evacuation would add confusion and anxiety and increase possibilities of death or injury.

Issue 10: Incomplete Analysis of Greenhouse Gases.

ES.6.15.2(5): The analysis ignores the additional vehicle emissions from waiting during construction due to lane restriction. Operation of Alternative 5 will lead to increased vehicle emission due the continuing disturbance of traffic as described earlier.

Issue 11: Incomplete Analysis of Utilities and Public Service Systems.

No mention is made in the DEIR of the main San Diego County Water Authority aqueduct which crosses under Pomerado Road just east of Scripps Ranch Blvd. Avoidance of this pipeline will require much more extensive excavation.

ES.6.18.2(5): Pomerado Road is a main travel route for emergency service vehicles in Scripps Ranch and Stonebridge estates, as well as for Poway, Ramona, and other areas to the east. The analysis ignores the traffic disturbance due to construction and ignores the fact that lane restrictions due to the narrow width of Pomerado Road and pavement anomalies would continue to impede emergency vehicles during operation.

Issue 12: Incomplete Analysis of Impact on Military Readiness.

There is no mention in the DEIR of any coordination or contact with the Navy or Marine Corps regarding Alternative 5 and the impact, if any, on the Marine Corps Air Station Miramar, the Navy Operational Support Center / Marine Corps Reserve Center, the Lincoln Military Housing at Pomerado Road and Scripps Ranch Row, or the East entrance to MCAS Miramar East at old Spring Canyon Rd / Sycamore Test Rd.

Issue 13: Incomplete Analysis of Cumulative Impacts.

ES.7.3 and Table ES.7-1 ignore the following Impacts in the Scripps Ranch area associated with Alternative 5:

- Continuing alteration of biology in the Carroll Creek watershed due to alteration of water flow.
- Continuing degradation of visual appearance due to over 30 manhole covers installed in a historic highway.
- Continuing effects due to alteration of hydrology in the Carroll Creek area.
- Continuing significant and unavoidable impediments to traffic flow due to pavement anomalies from splice vaults and manholes.
- Continuing interference with a critical fire / emergency evacuation route.
- Continuing increased danger to cyclists due to traffic interference with current class 2 bicycle lanes.
- Continuing long term increase in Greenhouse Gases due to traffic restriction.

- Continuing interference with air traffic and communications

The most important cumulative impact is on future Utility and Service systems. This impact is completely ignored in the DEIR, but is cumulatively considerable. Aside from any induced-current effects on existing utilities, the new transmission line will prevent or greatly increase the difficulty of construction of new or upgraded sewer, storm water, potable water, recycled and reclaimed water, natural gas, residential-electricity, telephone, and data communications facilities along Pomerado Road, Stonebridge Parkway, and in the Mira Mesa Industrial area. Physically, the large volume of concrete and the extensive splice vaults will have to be avoided in any future repair of existing facilities or construction of new facilities. Induced current and magnetic effects may preclude installation of any future systems involving metal piping or conductors. These impacts might be partially mitigated by coordinating with other utilities and installing new systems at the same time and as a condition of approval as the proposed transmission line. For example, a reclaimed water line (“purple pipe”) extending from the present terminus on Pomerado Road at Avenue of Nations east on Pomerado Road to Stonebridge Parkway has been proposed for several years, and should be required as a condition of approval. However, at this point it is clear that no planning or coordination with the City or community has been conducted.

Issue 14: Inaccurate and Incomplete Analysis of Cumulative Impacts.

Table 5.4-1 lists projects which might cumulatively impact project alternatives. It is inaccurate and incomplete.

Project No. 41, is incorrectly described. The Carroll Canyon Commercial Center was withdrawn approximately a year ago. A mixed use complex with about 250 residential units and 12,000 square feet of commercial retail space is now pending. The DEIR is expected in 2015.

Table 5.4.1 omits at least the following approved and planned projects:

Chabad Scripps Ranch Campus of Life: Construct three multi-story dormitory apartment buildings on site. Approved in 2009. 10785 Pomerado Rd, Construction to begin in 2015 or 2016.

Fire Station 37 Annex at Pomerado Road and Avenida Magnifica. Construction is planned in 2017.

SDG&E / SOCALGAS Pipeline Safety and Reliability Project – This is a 47-mile 36” Natural Gas Transmission line filed with the CPUC in Sept. 2015. The recommended route includes an underground segment under Pomerado Road along the exact route proposed for Alternative 5. At this time, while it is possible that both lines can be installed if they are at least 5 feet apart, it appears unlikely that both the electrical and gas transmission lines can be accommodated

everywhere along the route because of the width of Pomerado Road, the proximity to slopes and wetlands, and the presence of other utility lines. Also, the timing of the projects may preclude simultaneous installation unless the Electrical Transmission project is substantially delayed.

In addition, there are many more projects along the proposed route in Mira Mesa which are not identified in Table 5.4.1. Please visit opensd.sandiego.gov for further information.

Issue 15: Insufficient Analysis of Environmental Effects Which Will Cause Substantial Adverse Effects on Human Beings.

Construction associated with Alternative 5 will have a profound impact on businesses along Miramar Road, Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road. The impact will spread throughout the Miramar Industrial area and along all of Miramar Road due to traffic displacement. Many of these businesses are involved in essential services to Human Beings, including institutional food service supply, medical devices and services, biologic services and supplies, time-critical construction supplies, support for MCAS Miramar, etc. Construction in the area will lead to months of disruption to these businesses and impact on their customers. In some instances, the business may not be able to continue operation after the project is complete due to loss of business during construction. Although discussion with local business and citizen groups should have occurred during analysis of Alternative 5, some mitigation might still be possible by working closely with the individual businesses to develop a schedule that will minimize impacts to the point that they are considered acceptable.

Issue 16: Incomplete Identification and Analysis of Alternatives

Appendix D gives other project alternatives that were rejected during analysis. Many of these alternatives are from outdated prior analyses. However, if even a little consultation had occurred with local community planning groups, other alternatives with much less negative impact on Mira Mesa than Alternative 5 could easily have been identified. Carroll Canyon, between Black Mountain Road west to Fenton Road / Carroll Canyon Road, is currently a sand/gravel quarry owned by Vulcan Materials Company. Vulcan is currently pursuing approval of a plan to build a mixed use project in the canyon that would include the construction of Carroll Canyon Road as a city-owned six-lane connector spanning the distance between I-15 and I-805. Small portions east from I-805 and west from Camino Ruiz are already constructed. While more construction is still several years in the future, temporary transmission lines could be run overhead now in Carroll Canyon, and then undergrounded in conjunction with the construction of Carroll Canyon Road. This would have almost no environmental impact since most of Carroll Canyon has been disturbed by surface mining operations for

decades, and is not close to businesses or housing. The eastern end of Carroll Canyon could be reached either from Segment A at I-15, under Mercy Road and south on either Black Mountain Road or Camino Ruiz, or from the Alternative 5 underground at Pomerado Road and I-15. The western end of Carroll Canyon is close to the Alternative 5 routing near Fenton Road and Carroll Canyon Road.

OVERALL CONCLUSION:

Given the missed alternatives, omissions, and errors in the DEIR it is clear that insufficient public notice, analysis, and consultation with the community have occurred regarding Alternative 5. The DEIR with respect to Alternative 5 is substantively deficient and should be withdrawn, re-scoped with the new alternatives including new public scoping meetings and consultation with Community Planning Groups, rewritten with complete analyses, and reissued for public comment before it is approved. The CPUC's conclusion that Alternative 5 is Environmentally Superior should be withdrawn until scoping meetings and public discussions are held, complete engineering analyses are performed, and a complete and accurate Environmental Impact Report is available.