



October 30, 2015

California Public Utilities Commission  
c/o Panorama Environmental, Inc.  
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San Francisco, CA 94111

VIA FAX (650-373-1211) & E-MAIL ([sycamorepenasquitos@panoramaenv.com](mailto:sycamorepenasquitos@panoramaenv.com))

Re: SDG&E Sycamore-Penasquitos 230-Kilovolt Transmission Line Project  
(A-14-04-011) – COMMENTS ON DRAFT EIR

Dear Commissioners and Staff:

The San Diego Unified School District (SDUSD) appreciates the opportunity to comment on the draft environmental impact report (DEIR) for the above-referenced project. This project involves installation and expansion of significant utilities infrastructure in urbanized areas served by SDUSD. Our concern is with the potential impacts of the project upon existing and/or planned facilities of SDUSD in the vicinity of the project route.

We have identified three SDUSD school sites in close proximity to Segment A of the project:

- Dingeman Elementary School, located at 11840 Scripps Creek Dr. (92131), approximately 560 feet south of the centerline of the project alignment;
- [E.B. Scripps \(K-5\)](#) School, located at 11778 Cypress Canyon Rd. (92131), approximately 945 feet south of the center line of the project alignment; and
- [Innovations Academy Charter School \(K-8\)](#) located at 10380 Spring Canyon Rd (92131), approximately 330 feet south of the center line of the project alignment.

It is important that the DEIR fully recognize the special nature of activities conducted at these locations and their unusual sensitivity to external disruptions, and that appropriate mitigation measures be employed to eliminate or minimize such disruptive effects.

We request that the California Public Utilities Commission, in reviewing the DEIR, and particularly the Mitigation Monitoring and Reporting Plan (MMRP), consider the following matters of concern to SDUSD:

1. Traffic.

The DEIR indicates that work at the project site and at the staging yards may occur at any and all times between 7:00 am and 7:00 pm. Movement of equipment on and off the project site will occur at the beginning and end of each work day. Also, street closures and other temporary traffic control measures are planned for times when certain project operations, such as line stringing, are being conducted.

The regular hours of project activity thus include the two time periods during which our school sites experience particularly heavy vehicular and pedestrian traffic – just prior to the start of school in the morning and just after the end of school in the afternoon. During those time periods, streets and sidewalks in the vicinity of the schools are in substantially more intensive use than during the rest of the day.

The MMRP provides for preparation and implementation of a Construction Transportation Management Plan (CTMP), but makes no reference to the specific traffic impacts upon school sites (other than to indicate, in the Noise component, that construction traffic should be routed away from schools when feasible). The Transportation and Traffic component of the MMRP should be revised to require: (i) that the CTMP include specific requirements for construction-related traffic to avoid streets and intersections in the proximity of school sites during recurring high-traffic periods; and (ii) that no temporary street or sidewalk closures occur in the proximity of school sites during recurring high-traffic periods.

2. Emergency Services.

Due to the high concentration of young children, schools have a particularly great need for reliable access to emergency services. Police, fire and medical facilities all are located within fairly close proximity to the SDUSD school sites, and it is important to SDUSD and the community at large that access to those facilities not be impaired during school hours. Given the locations of the public service facilities relative to the school sites, such interruption is possible.

The DEIR references this issue and identifies the public service facilities in question, but the MMRP makes no provision for protecting access. The MMRP should be revised to include a requirement that any interruptions to vehicular and pedestrian traffic in the vicinity of the SDUSD school sites be managed in such a way as to not impact direct, convenient access to the nearest police, fire and medical facilities.

3. Noise.

Noise has particularly disruptive effects upon the ongoing activities of school facilities. The DEIR discusses impacts from vehicular movement, trenching, drilling, blasting and other noise-generating activity in connection with project construction, substantially in excess of ambient noise levels. It particularly notes that helicopter activity, in connection with delivery of project components and stringing of power lines, may occur at any time during working hours. Unlike traffic impacts, these noise impacts may affect our facilities and their occupants throughout the school day. The DEIR identifies several noise-sensitive receptors (including one private school facility) located within 1,000 feet of Segment A of the project, but makes no mention of any of SDUSD's school sites.

SDUSD's facilities all should be added to the list of noise-sensitive receptors in Table 4.8-2. The Noise component of the MMRP should be revised to mandate: (i) stricter noise attenuation for project work in the vicinity of school sites; and (ii) a larger separation between helicopter operation areas and school sites.

4. Electro-Magnetic Fields.

The DEIR acknowledges in the Project Description that the project will generate an electro-magnetic field (EMF). However, the DEIR asserts that no analysis of this phenomenon is required under the California Environmental Quality Act, due to the lack of agreement as to any health impacts of an EMF and the lack of standards for defining any potential risk.

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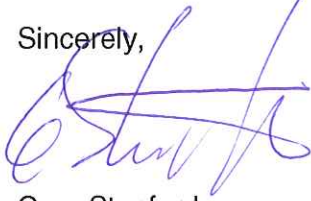
At the same time, the DEIR acknowledges that the Standards for School Site Selection promulgated by the California Department of Education include a requirement that new school sites be located specified minimum distances from power line easements. In the case of a 230 kV line, such as the one proposed here, that minimum separation is 150 feet. Inasmuch as the easement width in Segment A of the project is 200 feet, that standard may preclude expansion of any of the three SDUSD sites described above, in light of their current relatively close proximity to the project alignment.

While not disputing the current state of scientific knowledge regarding the potential impacts of EMFs (or lack thereof), SDUSD requests that consideration be given to a project alternative which would realign segments of the project so as to create a greater separation from the three SDUSD school sites.

We will be pleased to discuss further any of the issues raised in this comment letter. Inquiries should be directed to:

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Sincerely,



Gary Stanford  
Director Project Management

GS/KF