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As the attorney for Rancho Penasquitos Concerned Citizens (“RPCC”) in the Sunrise CPCN Proceeding and as twenty year resident of the neighborhood affected by Alternative 3, there is nobody who is more intimately familiar with the various lines that have been drawn on a map between the Sycamore Canyon substation and the Penasquitos substation since Sunrise and continuing now within this proceeding.

The DEIR for the current incarnation of this project includes as an alternative a routing that would underground a transmission line through the heart of a neighborhood and in front of an elementary school. This alternative has been named Alternative 3. At the workshops held in Rancho Penasquitos following the release of the DEIR it was reported that this alternative was an alternative that was originally suggested by RPCC and West Chase Homeowners Association within the Sunrise Powerlink proceeding and it clearly appeared that this was therefore the impetus for carrying forward this ill-advised alternative. While the CPUC has since sent out a memorandum correcting the fact that neither RPCC nor West Chase Homeowners Association ever put forward an alternative that would bring a proposed 230,000 volt transmission line into the heart of a neighborhood, the fact remains that this alternative was carried forward. In fact, the alternatives set forth by RPCC in Sunrise, not the least of which was the eventual adopted system upgrades, were all attempts to avoid the very neighborhood that SDG&E’s proposed Sunrise Project ran through and for which Alternative 3 does so at an even greater extent. However, even SDG&E seemed to understand within the Sunrise proceedings that proposing to run this huge transmission line past an elementary school and then in between single family homes with a roadway width of a mere 37 feet, was unacceptable. Yet, this is how the current alternative is mapped out because the CPUC consultants mistakenly believed that prior Sunrise intervenors had suggested the routing we see within Alternative 3.

Alternative 3, should be downgraded within the rankings of alternatives to dead last, for multiple reasons. EMF and its potential health effects on children cannot be ignored. Yet Alternative 3 runs a huge transmission line right along the front of an elementary school and in front of a busy park which sits across the street from the elementary school. The road where the transmission line would be buried is the only available route to get to the elementary school for children traveling from either the east or the west. Children and their parents constantly use the sidewalks abutting Park Village Road to travel to and from school, not to mention the fact that the elementary school itself fronts Park Village Road for hundreds of feet. As one travels west of the intersection of Camino Del Sur and Park Village Road, where the elementary school is located, the street becomes a two lane road. As the street narrows, there are single family homes which abut, at first just one side of the road, and then further down, each side of the 37 foot wide road where the transmission line would be buried. These homeowners would need to merely walk out of their garage and within 30 feet of their own garage

door, they would be standing on top of the proposed transmission line. Please see the photos below depicting the conditions typical of this suburban neighborhood where the transmission line would run at the west end of Park Village Road where single family houses abut both sides of this residential roadway.





Alternative 3 would also would also cause construction impacts well beyond normal construction impacts associated with any project. This is because of the unique character of the neighborhood Alternative 3 would impact. Park Village Road is an approximately 3 mile long, one way in, one way out road, that serves the significant residential neighborhood surrounding each side of the roadway. Residents of Park Village would not be able to travel an alternative route to avoid construction. There would be significant traffic impacts as residents commute to work and to those parents and students of middle and high schoolers who must commute to schools located outside of the area. Traffic already backs up significantly in the morning at the intersection of Park Village Road and Black Mountain Road as residents attempt to leave the one way in one way out neighborhood at this intersection.

For years, the issue of a wild fire and the lack of an evacuation route, except eastward on Park Village Road (where the fire would be approaching from due to the prevailing Santa Ana winds) has been discussed as a major problem for the area. Adding construction that would take away lanes would make evacuating thousands of Park Village Residents in the event of another San Diego wild fire even more dangerous.

Lastly, as the road narrows, how would the residents pictured above even get their vehicles in and out of their driveways when construction was underway?

Alternative 3 would cause unbearable noise and air quality impacts for residents, and the elementary school along the route. As shown above, the impact of noise and air quality to residents from the equipment necessary to construct a large trench right outside your front door would be tremendous. Picture yourself standing on the sidewalk where the lower photograph above was taken. A mere 5-10 feet away would be the edge of the trench that would be necessary for this work (the sewer runs down the middle of the street so the trench would necessarily need to be on one side or the other). Unlike commercial areas where the work could be performed out nighttime, nighttime would not work in this residential area and daytime work would not be any better, from a noise perspective.

The proposed project is a significant commercial undertaking. Commercial projects need to be placed in commercial settings, not single family neighborhoods where the house entrances abut the roadway where the transmission line would be placed. For these reasons, Alternative 3 should not even be an option at all, let alone ranked as the second most superior alternative. Alternative 5, which places the transmission line in commercial areas or underneath roadways that service commercial areas or otherwise do not have house fronts abutting them, is by far and away the better alternative, should the Commission decide not to go with the proposed project.

Sincerely,

/s/ Harvey M. Payne

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