

## Comment Set A Padre Dam Municipal Water District

### Miguel-Mission 230 kV #2 Project

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**From:** Lindquist, Mary [mlindquist@padre.org]  
**Sent:** Tuesday, May 11, 2004 5:06 PM  
**To:** miguelmission@aspeneg.com  
**Cc:** Lau, Albert  
**Subject:** Lindquist, Mary - SDG&E Miguel Mission 230 kV #2 Project

To: Michael Rosauer  
California Public Utilities Commission  
c/o Aspen Environmental Group

Comment to the Draft EIR

Padre Dam Municipal Water District requests the entry of a comment as to a provision to be added to the EIR list of mitigation measures. Padre Dam is concerned about cathodic protection to **any** steel pipes near any kV lines to be buried underground such as in the Mission Gorge Alternative.

A-1

Mary Ellis Lindquist  
Right of Way Agent  
Padre Dam Municipal Water District  
10887 Woodside Ave  
P.O. Box 719003  
Santee CA 92072-9003  
619 258 4651

## Responses to Comment Set A Padre Dam Municipal Water District

- A-1 The Mission Gorge Alternative is not an alternative evaluated in the Draft EIR for the Miguel-Mission 230 kV #2 Project and thus Mission Gorge Road would not be affected. However, several of the alternatives have proposed underground route segments, such as in Princess Joann Road, and thus the potential for collocation of the transmission line with steel pipelines exists. Therefore, text has been added to the Impact U-1 (Utility System Disruption) discussion in Section D.10.3.3 that addresses the potential for the underground transmission line to increase corrosion on existing steel pipelines, which could lead to long term accidental system disruption of such pipelines. In addition, Mitigation Measure U-1a (Utilities Protection Against Corrosion) has been incorporated into this Final EIR that requires SDG&E to evaluate the potential for any underground transmission lines to increase corrosion on existing pipelines and if potential is determined to exist, the measure would require SDG&E to install the required cathodic protection systems that would eliminate the risk of corrosion. This measure would apply to the Jamacha Valley 138 kV/69 kV Underground Alternative and the City of Santee 138 kV/69 kV Underground Alternative.

Because underground line construction involves more construction in close proximity to existing utilities on a mile-per-mile basis than overhead construction, the chances of underground line construction activities causing an accidental utility service interruption are greater than for overhead construction. In addition, there is potential for the proposed underground transmission line to increase corrosion on existing steel pipelines which could lead to long term accidental system disruption of such pipelines. Accidental service disruptions would be considered potentially significant impacts, but mitigable to less than significant levels (Class II) with implementation of Mitigation Measure U-1a below.

### ***Mitigation Measure for Impact U-1: Utility System Disruption***

**U-1a Protect Utilities Against Corrosion.** SDG&E shall evaluate the potential for the underground transmission line to increase corrosion on existing pipelines. If this potential is determined to exist, SDG&E shall be responsible for installation of the required cathodic protection systems that would eliminate this risk. A letter documenting these consultations and their results, including concurrence by the affected jurisdiction(s) and other companies, shall be provided to the CPUC prior to the start of construction.

Comment Set B  
Instituto de Informatica

Miguel-Mission 230 kV #2 Project

**From:** Tony Colleraine [colleraine@InstitutoInformatica.org]  
**Sent:** Wednesday, May 12, 2004 2:03 PM  
**To:** miguelmission@aspenerg.com  
**Subject:** SDGE Mission-Miguel power line proposal

I understand that this proposed electrical power transmission line from Mission Valley in San Diego to Chula Vista is to facilitate the importation of more electricity from Mexico.

I note that the press in Mexicali, Baja California, reported in April that the Mexican Comision Federal de Electricidad (CFE) had reluctantly approved a plan for large users in Mexico to shop around for electrical energy. In particular, the maquiladoras of Mexicali and Tijuana are now permitted to enter into contracts to buy significantly cheaper power from the USA.

We therefore have the interesting situation that the new, US-funded, generating plants built in the Mexicali region will export power to the USA which will likely be bought back by the large users, such as Sony and Mitsubishi, to replace the extremely expensive and tight supply of CFE-generated power from Cerro Prieto and Rosarito.

Peak demand for power in Baja California occurs during the hottest months of the year. Has the California Public Utilities Commission factored this possible net loss of available summer capacity into the overall plan?

Tony Colleraine

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Dr. Anthony Colleraine  
Director General  
Instituto de Informatica  
San Felipe, B.C. Mexico

B-1

## **Responses to Comment Set B**

### **Instituto de Informatica**

- B-1        The concern raised by the comment is whether the Proposed Project would cause increased power exports from the SDG&E area to Mexicali or Tijuana. Under existing conditions, there are transmission facilities that allow power export and import across the border (also known as Path 45) from SDG&E to the Mexican Comisión Federal de Electricidad (CFE). The purpose of the Proposed Project is to facilitate delivery of power from Miguel Substation (near Chula Vista) to SDG&E customers generally north of the Miguel Substation (the Project Purpose and Need are described in Section A.2 of the DEIR). The Proposed Project would not include any improvements to the transmission lines that cross the U.S.-Mexico border. Because the existing international transmission lines would not be modified by the Proposed Project, the CPUC does not anticipate any environmental impacts from power transfers between CFE and SDG&E.

Comment Set C  
San Diego County Water Authority



May 14, 2004

Mr. Michael Rosauer, CPUC  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

**Subject: Comments on the Draft Environmental Impact Report (EIR) for the Proposed Miguel-Mission 230kV #2 Project (SCH#2003091025)**

Dear Mr. Rosauer:

Thank you for providing the San Diego County Water Authority (Water Authority) with a copy of the above-referenced document. The Water Authority has reviewed the relevant portions of the document and offers the following comments.

The Water Authority maintains a right-of-way (ROW) for the Second Aqueduct that will be traversed by the proposed project improvements. The Water Authority requests notification and consultation from the California Public Utilities Commission if any aspect of the proposed project conflicts with or impacts this Water Authority ROW or facilities. Please contact Fred Clark of the Right of Way Department at (858) 522-6914 regarding proposed improvements affecting any Water Authority rights of way.

Please retain the Water Authority on your mailing list to receive the Final EIR and other information concerning this project. If you have any questions, please contact me at (858) 522-6763.

Sincerely,

M. Kelley Gage  
Water Resources Specialist

Cc: Fred Clark, Water Authority, Supervisor, Right of Way Department  
Michele Shumate, Water Authority, Right of Way Technician II  
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C-1

## **Responses to Comment Set C**

### **San Diego County Water Authority**

- C-1 Section D.10.3.3 in the Public Services and Utilities section of the Draft EIR acknowledges impacts (Impact U-1: Utility Service Disruptions) to underground utilities with the excavation and drilling of new foundations and for the underground alternatives. As described in PP-66, the Applicant is required by State law to contact Underground Service Alert and manually probe for existing buried utilities in the Proposed Project corridor prior to any powered-equipment drilling or excavation. After probing within the corridor for existing utilities, exact placement of the tower and pole foundations would be determined so that they would not conflict with other co-located utilities. In addition, Mitigation Measure U-1a (Protect Utilities Against Corrosion) requires SDG&E to obtain concurrence from the affected jurisdiction(s) and other utility companies if an underground option is implemented for the proposed project. Therefore, if the project is approved and a specific route is selected, SDG&E would be required to coordinate with the affected jurisdictions, including the San Diego County Water Authority, as appropriate.

Comment Set D  
Helix Water District



**Helix Water District**

Setting standards of excellence in public service

7811 University Avenue  
La Mesa, CA 91941-4927

(619) 466-0585  
FAX (619) 466-1823  
www.hwd.com

May 17, 2004

Michael Rosauer  
California Public Utilities Commission  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Subject: Comments to the Draft EIR for SDG&E's Proposed Miguel-Mission  
230 kV, # 2 Project

Dear Mr. Rosauer:

Thank you for this opportunity to comment on the subject Draft EIR.

Helix Water District does not object to the project as described in the Draft EIR, however, the District wishes to advise SDG&E that the project right of way abuts the District's R. M. Levy Treatment Plant adjacent to Lake Jennings in the community of Lakeside.

If access across the Treatment Plant property is required for the project please contact the Treatment Plant staff at (619) 443-1031.

If you have questions, or need more information, please feel free to call me at (619) 667-6268.

Sincerely,

Harry Campbell, SRWA  
Senior Right of Way Agent/Environmental Analyst

- c: C. Lugo, HWD
- D. Gauthier, HWD
- M. Umphres, HWD
- L. Lyford, HWD

D-1



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## **Responses to Comment Set D**

### **Helix Water District**

- D-1        If the project is approved and a specific route is selected, SDG&E would be required to coordinate with the affected jurisdictions, including Helix Water District, as appropriate. If access across the R.M. Levy Treatment Plant is required than SDG&E would contact the Treatment staff.



Comment Set E  
City of Santee



CITY OF SANTEE

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May 17, 2004

Michael Rosauer  
CPUC  
C/o Aspen Environmental Group  
235 Montgomery Street, 935  
San Francisco, CA 94104

**SUBJECT: Comments on the Draft Environmental Impact Report (DEIR) for  
SDG&E's Proposed Miguel – Mission 230kV#2 Project**

Dear Mr. Rosauer:

The City of Santee has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Miguel – Mission 230kV#2 Project, dated April 2004. The DEIR is prepared in response to San Diego Gas and Electric Company's Application for a Certificate of Public Convenience and Necessity (CPCN) filed with the California Public Utilities Commission back in July of 2002. The DEIR evaluates the potential impacts associated with the installation of a single 230kV transmission circuit within the existing 35-mile SDG&E utility right-of-way that extends from the Miguel (Sweetwater) substation to the Mission (San Diego) substation. The right-of-way through north Santee is approximately 2.5 miles in length.

The DEIR describes a project with three components: (1) installation of the 230kV circuit on modified steel lattice or new pole structures; (2) relocation of the existing 138kV and 69kV circuits onto a new alignment of poles within the existing right-of-way; and (3) substation modifications. In Santee, the project would involve the conversion of circuits on 8 pair of existing 69kV and 138kV lattice tower structures to support the new 230kV circuit and the construction of up to 8 steel poles near these structures, span for span, to support the displaced 69 and 138 kV circuits. The project does not include undergrounding of any circuits.

E-1

Comment Set E, cont.  
City of Santee

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 2

On March 8, 2004, SDG&E filed another Certificate of Public Convenience and Necessity with the California Public Utilities Commission, together with a “Proponent’s Environmental Assessment” (PEA) for the Otay Mesa Power Purchase Agreement Transmission project. This project is approximately 52 miles in length, to include the 35-mile SDG&E utility right-of-way associated with the Miguel Mission 230kV #2 Project, and proposes to install another 230 kV circuit on the existing lattice towers.

E-1

Therefore, this project relies upon the approval and construction of the Miguel – Mission Project. The DEIR evaluates *in general terms* the potential impacts associated with constructing and operating the future 230kV circuit (Otay Mesa project). It is important to note that this is a separate project for which an EIR may be required by the CPUC. Additionally, the Sycamore Landfill has submitted an application to the City of San Diego to permit the expansion of the landfill, and with it, the relocation of the transmission towers on the site. A DEIR is being prepared for this project. The City is concerned that project segmentalization may not comprehensively address the environmental effects of these projects.

The following environmental issue areas are evaluated in the DEIR: Air Quality, Biological Resources, Cultural Resources, Geology, Soils and Paleontology, Hydrology and Water Quality, Land Use, Noise and Vibration, Public Health & Safety, Public Services and Utilities, Socio-economics, Transportation & Traffic, and Visual Resources. Electromagnetic frequency (EMF) assessment was noted as being outside the purview of the California Environmental Quality Act.

E-2

Specific to the City of Santee, the DEIR identifies two alternatives that focus on the north Magnolia/Princess Joann residential area. The first proposes undergrounding the 138 kV and 69kV circuits for a distance of 1.35 miles. This segment begins at the water tank site (due east of the eastern terminus of Princess Joann Road) and follows Princess Joann to its western terminus. The 69/138 kV undergrounding alternative would eliminate three steel poles from the currently proposed project and two existing 138kV wood poles on the west side of Magnolia Avenue. Transition poles would be required at both end points.

The second alternative is the installation of the proposed overhead 230kV circuit on support structures along the *northern* boundary of the SDG&E right-of-way that would extend from the Padre Dam water tank site to a point approximately 800 feet northwest of the western end of Princess Joann Road, for a total distance of 4,200 feet. This requires the construction of three steel monopoles approximately 35 feet beyond, and parallel to, the existing utility right-of-way, and construction of two transition towers (crossover circuit points).

**Comment Set E, cont.  
City of Santee**

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 3

The 230kV Overhead Northern ROW Boundary alternative would thus eliminate the project's proposed 69/138 kV steel poles near the lattice towers since these circuits would remain on the towers, and would instead install three poles designed to support 230 kV circuits outside the existing ROW.

E-2

The City submits the following comments on the DEIR:

**Land Use**

The SDG&E utility right-of-way in Santee traverses existing neighborhoods, land designated "Planned Development", the Santee Lakes Regional Park and Campground, the Stowe Trail, and, to the immediate west, the Mission Trails Regional Park and Sycamore Landfill.

E-3

The City is concerned about the long-term implications for land development and future neighborhoods, as well as present neighborhoods. Much of the 2.5 mile Santee segment traverses undeveloped "Fanita Ranch" which is a planned development area encompassing 2,589 acres, and there are a number of smaller in-fill residential sites in the Summit – Magnolia residential area through which the easement runs. As areas develop the visual effects of additional poles and circuits will become more significant, and the development implications for building setbacks and appropriate land uses (location of parks and schools) must be disclosed. The DEIR provides no information on the effect upon future residential development by the addition of up to two 230 kV circuits within a very narrow ROW.

**Public Health & Safety**

Section D.9.6 – Electric and Magnetic Fields and other Field Related Concerns

In the City's Response to the Notice of Preparation of the EIR, information on electric and magnetic field effects and minimum recommended setbacks from established and planned uses within the EMF field was requested. The City remains highly concerned about the potential adverse effects of exposure to electromagnetic frequencies. Section D.9.6 describes but draws no conclusions about the electric and magnetic field data, relying instead on a statement that there is no scientific consensus for a causal relation between cancer and exposure to EMF fields. However, the International Agency for Research on Cancer (IARC) and the California Department of Health Services have classified EMF as a possible carcinogen, and the IARC has established an elevated risk at exposures between **3 and 4 milligauss (mG)**.

E-4

## Comment Set E, cont. City of Santee

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 4

This information is contained in the Executive Summary and Appendix 5; because of its importance, this information should be incorporated in the EIR to strengthen the rationale for undergrounding the transmission system.

E-4

The width of the utility right-of-way (ROW) as it traverses Santee is only 150 feet while elsewhere along the project route the ROW is wider at 200 feet and 250 feet. As such, the EMF exposure at the edge of the ROW in Santee will be higher at shorter distances. The DEIR notes that, at a distance of 300 feet from a 230kV circuit support structure, electric field strength decreases to typical residential levels (10V/m). Similarly, magnetic field strength 300 feet from the structure is 1.0 mG, where typical residential field strength is 0.9 mG.

E-5

The electric and magnetic field strengths measured 50 feet from a support structure are 1.5kV and 20mG respectively. Therefore, the City of Santee strongly recommends the undergrounding of the total transmission facility within City limits, supported in part for public health and safety reasons. (Appendix 5 of the DEIR includes specific information on EMF levels at edge of ROW based on Segment Points).

A map that identifies the location of these points is strongly recommended since Table B-2 does not correlate with Appendix Table A.5.2. Additionally, the Appendix Table should be expanded to show the EMF change with the addition of a second 230 kV circuit since the DEIR references this future project in the selected environmental issue areas. EMF information about the Princess Joann undergrounding alternative should be included in the project discussion wherever this discussion appears in the EIR because this advances and strengthens the justification to underground the transmission system.

Pending conclusive scientific evidence of possible harm, in 1993 the CPUC adopted interim measures that include “no cost and low-cost steps to reduce EMF levels” (D.93-11-013). Specifically, when new or upgraded projects are proposed by SDG&E, this measure provides that approximately 4% of the project’s budget may be used for reducing EMF levels.

E-6

The City strongly believes that a 4% threshold is inappropriate if the elevated EMF readings associated with the proposed project are to be reduced to safe levels. The City hereby requests that the CPUC eliminate this threshold from consideration in the undergrounding of any and all circuits pertaining to this project. The Otay Mesa Power Purchase Agreement Transmission Project (CPUC filing A.04-03-008) proposes undergrounding significant segments within San Diego. Undergrounding is technologically and physically feasible, as disclosed in the DEIR and the City urges the CPUC to support undergrounding of the facilities through Santee at this time.

**Comment Set E, cont.**  
**City of Santee**

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 5

**Cultural Resources**

Chapter D.4 provides information on cultural resources, and 58 sites are listed in Table D.4.1. This Table should be divided into more meaningful groups so that sites within jurisdictions may be ascertained. Of the 58 sites, 15 were determined to be ineligible for listing in the California Register of Historical Resources (CRHR), and it is unclear whether there are eligible or listed sites within Santee that would be affected by the proposed project. Since the undergrounding of the transmission facility through Santee was dismissed based upon significant impacts to cultural resources, additional disclosure and analysis is imperative in the EIR.

E-7

**Aesthetics**

The City of Santee strongly recommends the undergrounding of the total transmission facility within City limits (all pre-existing and new circuits/lines). The City continues to believe that this is the environmentally superior alternative.

E-8

However, if the position of a baseline condition prevails in the EIR, the City strongly recommends that undergrounding of the 69/138 kV circuits be entirely within the existing ROW, that is, extended to include the entire 2.5 mile segment within the City, not just the easternmost 1.35 miles. This would result in the elimination of the 8 proposed steel poles adjacent to the lattice towers and reduce line clutter. The existing towers would then be modified to support the 230 kV line(s), and would reduce the project's visual impacts significantly.

The 230 kV Northern ROW Boundary Alternative would not significantly improve visual quality over the proposed project, since it proposes the construction of steel monopoles to support the 230 kV circuits above ground within a limited area.

**Noise and Vibration**

Construction noise, construction vibration and corona noise are identified in the DEIR as significant but mitigable impacts. The mitigation measures rely largely upon public notification of pending noise and establishing a noise/vibration resolution procedure. These measures do not reduce noise levels, but do inform the public in advance. The City requests copies of all notifications. Other mitigation measures include construction protocols that limit truck idling and limiting construction activities in accordance with local noise regulations.

E-9

**Comment Set E, cont.**  
**City of Santee**

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 6

It is important to note in this discussion the time required to construct the project (reference Table B-4). Table B-4 identifies a construction period beginning in June of 2004 with the construction of access roads and ending in June of 2006. As such, residents, school children and recreational users in Santee could be subject to noise close to, or in excess of 60dBA for two years or longer, depending on the final design of the project. The loudest noise generators will be from jack hammers, rock drills (98dBA) helicopters (95 dBA).

E-9

The DEIR should include a map with the projected noise contours associated with construction activities, and it should be made clear whether Santee will be subject to helicopter noise.

E-10

The City's Noise Ordinance restricts construction noise to 75 Ldn over a maximum 8-hour period, allows this activity between 7:00 a.m. and 7:00 p.m. Monday through Saturday, and establishes no construction days. The City would require SDG&E compliance with the regulations of Chapter 8.12 of the Santee Municipal Code (Noise Abatement and Control).

E-11

Corona (hissing or crackling high voltage sounds) may be as high as 40.7 dBA during rain and fog events, as measured from edge of ROW. The DEIR should state this distance given the variation in ROW width along the project route. Transmission configurations and intact conductor surfaces reduce corona, but, at night, this noise will be audible within the city's existing residential neighborhoods.

E-12

The DEIR states that it is unknown at this time where the loudest corona noise will be produced. Given this, the City recommends a noise map that depicts the areas potentially subject to the highest calculated levels under good and inclement weather. The City must also be included in Mitigation Measure for Impact N-3.

This mitigation measure is as follows:

Mitigation measure N-3 would require that SDG&E prepare a noise assessment report for review by the City of Santee, Code Compliance Division, and the CPUC. The report would identify the transmission line location(s) where it would be adjacent to residences, and for those locations, the configuration of the transmission line sections, the expected maximum corona noise levels at the edge of the ROW, with a comparison to the City's noise standards.

**Comment Set E, cont.  
City of Santee**

CPUC – Mike Rosauer  
Miguel Mission 230 kV#2 DEIR  
May 17, 2004  
Page 7

**Project Alternatives in Santee**

The City of Santee appreciates the inclusion of a partial undergrounding of transmission lines through an existing residential neighborhood. However, while acknowledging that the CPUC has taken an unprecedented positive step in Santee by finding the partial undergrounding of the 138 kV and 69kV circuits to be a superior and feasible alternative, the City recommends the complete undergrounding of these two circuits, plus all existing circuits for their entire length in the City and within the SDG&E right of way. Only with this alternative, can all potential impacts of the project as well as the existing circuits be adequately mitigated within Santee.

E-13

**General Comments**

The City of Santee General Plan was adopted in August of 2003 and should be so noted (see page D.7-6).

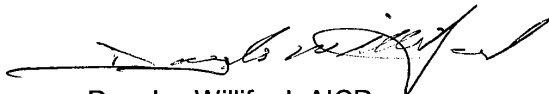
E-14

The DEIR states a construction period of two years. The EIR should clarify whether there will be shorter timeframes within jurisdictions. The segment within Santee is 2.5 miles. Therefore, the construction period may be shorter in Santee. This would be significant information for Santee. Other jurisdictions may also benefit from knowing respective construction timeframes.

E-15

Thank you for the opportunity to comment on the DEIR. You may contact me at (619) 258-4100, extension 167, with any comments or responses to this letter.

Sincerely,



Douglas Williford, AICP  
Director of Development Services

- c. Keith Till, City Manager  
Shawn Hagerty, City Attorney

## Responses to Comment Set E City of Santee

E-1 The commenter's description of the Proposed Project is accurate. Section F (Other CEQA Considerations) analyzes the cumulative scenario based upon a compilation of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The Sycamore Landfill Master Plan Expansion is included in this analysis and is listed in Table F-1 on page F-8 of the Draft EIR.

In addition, the portion of the Otay Mesa Power Purchase Agreement transmission line that would be in the Miguel-Mission 230 kV #2 Project ROW has been analyzed under each issue area in Section D of the Draft EIR as the Proposed Project with future circuit. A general discussion of the future circuit is included in Section B.1.2. Please refer to General Response GR-1 for a discussion of how the Proposed Project is related to other transmission improvements.

E-2 The description of the Draft EIR analysis and the alternative evaluated in the City of Santee are accurate.

E-3 As discussed in Response to Comment E-1, Section F (Other CEQA Considerations) analyzes the cumulative impacts of the Proposed Project. Based on information provided by the City of Santee, the future development of 20 residential single-family homes at Dakota Ranch (intersection of Princess Joann and Cuyamaca Roads) is listed in Table F-1 and is analyzed under the cumulative impacts of the Proposed Project and alternatives. The Cumulative Project Table (Table F-1) has also been modified as follows to include the Fanita Ranch development.

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<u>22a</u>	<u>Fanita Ranch</u>	<u>Residential</u>	<u>3,000 units on 2,589 acres, northern portion of the City of Santee</u>	<u>North of Mast Boulevard, and east of Fanita Parkway and the Sycamore Creek drainage</u>	<u>Planned Estimated date of construction – unknown</u>
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In addition, as discussed in detail in Section D.7.3.3 under Impact L-1 (Conflict with an Applicable Land Use Plan, Policy, or Regulation), the Proposed Project would be consistent (with mitigation) with affected jurisdictions' plans for development. Given that the Proposed Project would occur within an existing transmission line corridor, and that all Proposed Project land use impacts would be less than significant with mitigation, it is likely that the project's incremental contribution to the area's development impacts would not be cumulatively considerable.

E-4 Information on electric and magnetic fields and previous research from the International Agency for Research on Cancer (IARC) is provided for informational purposes only (see DEIR Executive Summary Section 3.8.3, page ES-44, and the first paragraph under Section D.9.6, page D.9-13). The CPUC decisionmakers may consider EMF and the City's recommendations regarding undergrounding during the proceeding; however, EMF is not an issue considered in the CEQA process. While IARC has classified EMF as a possible carcinogen, as a comparison IARC uses the same classification for coffee. IARC has not established a link between EMF exposure and increased risk of cancer. For further information on drawing conclusions about the EMF data, please see General Response GR-2.



E-5 The section of the existing ROW that is within the City of Santee is shown in Table B-2 as 150 feet wide (DEIR, page B-10). It should be noted that elsewhere in the DEIR, this particular section of the ROW within the City of Santee is called Subsection E of the overall alignment between the Miguel and Mission Substations (see DEIR, pages B-29 to B-31), and Segments E2 and E3 are the portions of Subsection E that are within the limits of the City of Santee. The EMF changes that would occur with the addition of the future circuit are shown in DEIR Tables D.9-8 and D.9-9 and Figure D.9-3 (pages D.9-25 to 30). In addition, detailed EMF data for Subsection E are provided in Table Ap.5-2. Therefore, there is a correlation in the data provided for the City of Santee segments of the ROW throughout the DEIR. Given the detailed information provided, no map is necessary. In addition, no changes are necessary to the information in the appendix because the future circuit is currently shown in DEIR Appendix Table Ap.5-2 as “Miguel-Sycamore Canyon #2.” As described in General Response GR-2, identifying superior alternatives in the DEIR does not depend on EMF information.

E-6 The comment indicates that the City of Santee would like to revisit the 1993 CPUC decision related to no-cost/low-cost EMF mitigation requirements (D.93-11-013, described on DEIR pages D.9-25 and D.9-30). Although the City of Santee is free to file an independent request with the Commission for revisiting Decision 93-11-013, such a request is beyond the scope of environmental review for the CEQA document.

The comment also points out that undergrounding is a component of SDG&E’s recently proposed Otay Mesa Power Purchase Agreement Transmission Project for segments within the City of San Diego. The DEIR shows that the City of Santee 138 kV/69 kV Underground Alternative is technologically and physically feasible, and is the environmentally superior alternative within the City of Santee (DEIR Table ES-4, page ES-60).

E-7 As stated in DEIR Appendix 2, Sections 4.2.2.2 and 4.2.2.3 (DEIR pages Ap.2-48 to -57), under “Potential New Impacts Created,” an underground transmission line within the existing corridor in the City of Santee would create greater than the Proposed Project impacts in several environmental disciplines, not only for cultural resources. Additional biological resources within the ROW would be affected, soil erosion would be increased, air emissions and dust would be greater, and construction noise levels would be greater and would occur for a longer period of time. Therefore, it is incorrect to state that undergrounding through Santee was dismissed based on significant impacts to cultural resources. Please also see Response to Comments E-8 and 8-3 for additional information on the feasibility of undergrounding the total transmission facility in the existing corridor. The following paragraphs present additional information to clarify impacts to cultural resources.

Table D.4-1 on page D.4-6 of the DEIR lists all of the previously recorded cultural resources in the Miguel-Mission Project ROW and the segments in which they are located. Rather than reorganizing Table D.4-1 by jurisdiction, new Tables D.4-6 through D.4-9 (in Section D.4.4, Project Alternatives) have been created (below) to provide information on sites that would be affected along alternative route alignments. These added tables list the previously recorded cultural resources involved in areas traversed by the various route alignments.

As noted in Section D.4.4.4 (City of Santee 138 kV/69 kV Underground Alternative), and the information provided below in Table D.4-9. (Cultural Resources Identified in the Miguel-Mission Project ROW involving the City of Santee 138 kV/69 kV Underground

Alternative), four archaeological sites are located in the 1.5-mile-long stretch of Proposed Project ROW that the existing 138 kV/69 kV circuits traverse. Of these four sites, only SDI-4885 is potentially eligible for listing in the California Register of Historic Resources (CRHR).

**Table D.4-6. Cultural Resources Identified in the Miguel-Mission Project ROW Involving the Jamacha Valley 138 kV/69 kV Underground Alternative**

<b>Resource</b>	<b>Description</b>	<b>CRHR Eligibility Status</b>	<b>Segment</b>
<a href="#">CA-SDI-4515</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4650</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4652</a>	<a href="#">Artifact scatter</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4881</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-10648</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-16401</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">SDM-W- 0924</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">SDM-W-1095</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>

Source: Collett and Cheever, 2002; SDG&E, 2003c.

**Table D.4-7. Cultural Resources Identified in the Miguel-Mission Project ROW Involving the Jamacha Valley Overhead A Alternative**

<b>Resource</b>	<b>Description</b>	<b>CRHR Eligibility Status</b>	<b>Segment</b>
<a href="#">CA-SDI-4650</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4883</a>	<a href="#">Artifact scatter</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-16401</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>

Source: Collett and Cheever, 2002; SDG&E, 2003c.

**Table D.4-8. Cultural Resources Identified in the Miguel-Mission Project ROW Involving the Jamacha Valley Overhead B Alternative**

<b>Resource</b>	<b>Description</b>	<b>CRHR Eligibility Status</b>	<b>Segment</b>
<a href="#">CA-SDI-4515</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4650</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4652</a>	<a href="#">Artifact scatter</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4881</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-4883</a>	<a href="#">Artifact scatter</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-10648</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-16401</a>	<a href="#">Milling site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">SDM-W- 0924</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">SDM-W-1095</a>	<a href="#">Habitation site</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>

Source: Collett and Cheever, 2002; SDG&E, 2003c.

**Table D.4-9. Cultural Resources Identified in the Miguel-Mission Project ROW involving the City of Santee 138 kV/69 kV Underground Alternative**

<b>Resource</b>	<b>Description</b>	<b>CRHR Eligibility Status</b>	<b>Segment</b>
<a href="#">CA-SDI-4885</a>	<a href="#">Artifact scatter</a>	<a href="#">Potentially eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-12099</a>	<a href="#">Artifact scatter</a>	<a href="#">Not eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-12244</a>	<a href="#">Milling site</a>	<a href="#">Not eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>
<a href="#">CA-SDI-12246</a>	<a href="#">Milling site</a>	<a href="#">Not eligible</a>	<a href="#">Miguel Substation to Fanita Junction</a>

Source: Collett and Cheever, 2002; SDG&E, 2003c.

- Implementation of the Project Protocols and mitigation measures [i.e., C-1a (Avoid all known cultural resources), C-1b (Conduct construction monitoring within 150 feet of known cultural resources), C-1c (Mark cultural resource boundaries), C-1d (Evaluate cultural resources that cannot be avoided), C-2a (Conduct archaeological survey), and C-2b (Conduct construction monitoring in the project area)] developed for the Proposed Project would reduce the potential impacts to cultural resources from this alternative to less than significant levels. Therefore, although information on cultural resources sites is not presented by jurisdiction, all necessary information and analysis is within Section D.4 and in the added tables, and no further additions are necessary.
- E-8 The commenter's support for undergrounding the total transmission facility (all pre-existing and new circuits/lines) within City limits is noted. The City of Santee 138 kV/69 kV Underground Alternative would relocate the 69 kV and 138 kV circuits underground within the City of Santee. Please see General Response GR-3 and Response to Comment 8-3 regarding undergrounding of transmission lines.
- E-9 The construction schedule noted in the comment (shown in DEIR, Table B-4) describes the duration of activity throughout the 35-mile ROW. This table shows that various stages of the Proposed Project would require about 24 months total, or roughly 0.7 months per mile. The actual duration of work that would occur within the City of Santee, where only about 2.5 miles of ROW occur, would therefore be about two months. The roughly 60 days of construction that would occur within the City would be spread out over the two-year total construction duration. This duration would be extended somewhat if the undergrounding alternative is selected by the decisionmakers.
- The City requests copies of all notifications. SDG&E would need to coordinate construction noise and traffic impacts with the City through various notifications, such as those under Mitigation Measure N-1a, which would involve notification of surrounding residences.
- E-10 SDG&E has not provided detailed information on which activities and locations would require use of helicopters. Normally, helicopters would only be used when traveling over steep terrain (DEIR, page B-38) or when crossing over major highways (to be determined while implementing Mitigation Measures T-1a and T-1b, related to traffic control plans and lane closures). Much of the ROW terrain within the City of Santee is accessible from the ground, and there are no major highways near the Proposed Project in Santee. As such, helicopter use in Santee would likely be minimal. It is not necessary to prepare noise contour maps for short-term transient activities, such as construction, because the locations of activity, and thus the noise impacts, change frequently.
- E-11 The DEIR describes that SDG&E would need to comply with the noise control regulations of the City of Santee Municipal Code (DEIR, page D.8-5).
- E-12 According to modeling information provided by SDG&E (Table 6-12 of the SDG&E PEA, 2002), the area of loudest corona noise (a level of 40.7 dBA) would occur near the Mission Substation in Segment F6 of the ROW. The corona noise levels expected to occur at the edge of the ROW in the City of Santee would be somewhat lower, a maximum of 35.8 dBA (Table 6-12 of the PEA). It is not necessary to add the City of Santee to Mitigation Measure N-3a, which deals with compliance of corona noise with local noise ordinances, because corona noise levels in the City of Santee would not exceed any limitations in the

- Santee Municipal Code. Excessive corona noise problems, should they occur within Santee, would be addressed by the recommended Mitigation Measure N-3b, which would require SDG&E to work with the CPUC to properly maintain the line to avoid corona noise. The Final EIR includes revised text to clarify the scope of the impact (Impact N-2, DEIR, page D.8-9).
- E-13 The commenter's support for undergrounding the total transmission facility (all pre-existing and new circuits/lines) within City limits and the SDG&E ROW is noted. Please refer to General Response GR-3 regarding undergrounding of transmission lines for a discussion of its legal feasibility issues.
- E-14 The adoption of the City of Santee General Plan in August 2003 is noted and the text in Section D.7 has been corrected to read:
- City of Santee 2020 General Plan (~~proposed in~~ 2003)
- E-15 Section B.4.1 on page B-33 in the Draft EIR presents a discussion of the construction schedule. Table B-4 breaks down the construction schedule proposed by SDG&E and presents the time period for each construction phase. Construction within individual jurisdictions would not be continuous, but it would likely include some activity during most of the phases and would potentially extend throughout the schedule. Please refer to Response to Comment E-9. In addition, the City of Santee Municipal Code limits construction noise to daytime hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday (see page D.8-5 of the Draft EIR) and would be applicable to the Proposed Project.