



THE CITY OF SAN DIEGO

October 17, 2006

Billie Blanchard, CPUC/ Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3106

Subject: City of San Diego Comments on the Notice of Preparation/Notice of Public Scoping Meeting for an Environmental Impact Report/Environmental Impact Statement for the proposed Sunrise Powerlink (SRPL) Project.

Dear Mr. Blanchard and Ms. Kastoll:

City Planning and Community Investment's Multiple Species Conservation Program (MSCP) offers the following comment on the Notice of Preparation/Notice of Public Scoping Meeting for an Environmental Impact Report/Environmental Impact Statement for the proposed Sunrise Powerlink (SRPL) Project:

City Planning and Community Investment-MSCP- Betsy Miller (619-533-4543)

Utility lines are considered a conditionally compatible use within the City of San Diego's Multiple Species Conservation Program (MSCP) Multi-habitat Planning Area (MHPA). Impacts from construction should be minimized to the maximum extent practicable, and should comply with the following guidelines (Subarea Plan Section 1.4.1):

1. All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.
2. All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required.



Development Services

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3. Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.

4. Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.

5. For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework

Management Section 1.5.

6. The SDG&E Sunrise Powerlink Project is being proposed within areas covered by the City of San Diego's MSCP. The project proponent is not requesting, nor are they being granted, Third Party Beneficiary status through the City of San Diego's MSCP. All "take" of endangered species will be permitted through SDGE's HCP.

7. The City of San Diego does not support the Coastal Link alternative and/or other alternatives that propose impacts to vernal pools.

8. When the project alignment is within the Multi-habitat Planning Area (MHPA) of the City's MSCP, the City request that the project conform to the following Land Use Adjacency Guidelines (MSCP Subarea Plan Section 1.4.3:

9. Lighting, if any, should be directed away from the MHPA, and shielded if necessary.

10. Drainage should be directed away from the MHPA, or if not possible, should not drain directly into the MHPA. Instead, runoff should flow into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA.

11. Landscaping

No invasive plant species shall be planted in or adjacent to the MHPA; it is recommended that the soil stabilization mix contain only locally-native species.

12. Brush Management

All Zone 1 brush management areas must be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation.

13. Grading

All manufactured slopes, if any, should be included within the development footprint and outside the MHPA.

14. Access

Access to the MHPA, if any, should be directed to minimize impacts and reduce impacts.

15. Noise

Due to the site's location within and adjacent to the MHPA, construction noise should be avoided, if possible, during the breeding season of the California gnatcatcher (3/1-8/15), least Bell's vireo (3/15-9/15), southwestern willow flycatcher (5/1-8/30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys will be required in order to determine species presence/absence. If the species are not identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and should include temporary noise walls/berms.

If a survey is not conducted and construction is proposed during the species' breeding season, presence would be assumed and a temporary wall/berm should be required. City standard's state that noise levels from construction activities during the bird breeding season should not exceed 60 dBA hourly LEQ at the edge of the occupied MHPA, or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ.

Park Planning and Development, Park and Recreation Department offers the following comment on the Notice of Preparation/Notice of Public Scoping Meeting for an Environmental Impact Report/Environmental Impact Statement for the proposed Sunrise Powerlink (SRPL) Project:

Park and Recreation Department, Barry Kelleher-Park Designer (619-525-8286)

1. The project passes through the Miramar Ranch North Community Planning Area (CPA) and Rancho Encantada CPA well as Scripps Miramar Ranch CPA. Please check the boundaries and include the all the community planning area names that are affected by the proposed project.

2. Chapter 4.5 and Chapter 8.5 both cover recreational resources and the impacts the proposed alignment will have on existing park properties. In the "Coastal Link" section, the chapters are inconsistent. They do not mention the same numbers of parks and omit,

or have overlooked, several which are within 0.25 mile of the project. These parks are in the Rancho Penasquitos and the Scripps Ranch, and Miramar Ranch North CPA's.

3. Parks potentially impacted include: Penasquitos Creek Park, Views West, Penasquitos Skate Park, Towne Centre Linear Park, Spring Canyon Park, Butterfly Mini Park, Scripps Ranch Community Park, and Cypress Canyon Neighborhood Park. There is an undeveloped park site in the Ranch Encantada CPA the project will impact. Please revise the text as necessary to include these park properties.

4. Please clarify if the project will be crossing above or below ground within the text when the proposed project is passing through or near a park property.

5. Please clarify if the new line will be collocated on existing structures, if new supports will be installed on existing towers, or if new poles/ towers will be built for the proposed power line wherever it is above ground and proposed to pass through or in close proximity to an existing or proposed park.

6. Please cite or clarify what above ground structures are necessary and will be visible where the project is underground within Penasquitos canyon.

Open Space Division, Park and Recreation Department offers the following comment on the Notice of Preparation/Notice of Public Scoping Meeting for an Environmental Impact Report/Environmental Impact Statement for the proposed Sunrise Powerlink (SRPL) Project:

**Park and Recreation Department, Paul Kilburg-Open Space Lands Coordinator
(619-533-6739)**

1. The proposed SDG&E Powerlink Project's Coastal Link single circuit 230kV transmission line runs from the Sycamore Canyon Substation to the Chicarita Substation and terminating at the Penasquitos Substation. The proposed alignment passes through parts of City of San Diego, Park and Recreation Department Open Space Division managed open space lands including Scripps Ranch Open Space, Sabre Springs Open Space and Los Penasquitos Canyon Preserve. The majority of these areas are part of the City of San Diego's Multi-Habitat Planning Area (MHPA) which was set aside to address multiple habitat needs and the preservation of native vegetation communities, as well as to provide recreational and educational opportunities for the public.

2. Park and Recreation Department Open Division staff has reviewed the information provided for the proposed SDG&E Powerlink Project's Coastal Link 230kV transmission line and have the following comments:

3. Land Use: The EIR should discuss methods to minimize impacts to the open space areas under the management of the Park and recreation Department. Applicable community groups including the Los Penasquitos Canyon Preserve Citizen's Advisory

Committee, the Los Penasquitos Canyon Preserve Task Force, the Sabre Springs Planning Group and the Scripps Ranch Planning Group should be given the opportunity to comment, provide input and kept up to date on the proposed project. Any proposed project staging areas on City open space would need to be approved by the Park and Recreation Department. The proposed under grounding from N56 to N72A and N72B is aligned on Park Village Drive before diverging into Los Penasquitos Canyon Preserve. Please provide further justification for impacting this area of Los Penasquitos Canyon Preserve as under grounding could continue along Park Village Drive (thus avoiding a significant portion of Los Penasquitos).

3. Biology: It is requested that the proposed project conform to the Multiple Species Conservation Plan (MSCP Subarea Plan) General Planning Policies and Design Guidelines 1.4.2 and the Land Use Adjacency Guidelines 1.4.3. Impacts to vernal pools should be avoided. Proposed construction and maintenance within wildlife corridors must avoid significant disruption of corridor usage. If the proposed project impacts MSCP covered species or wetlands, mitigation would be required. Areas of impact to native vegetation within City open space related to the proposed project and areas where removal of existing power poles are proposed, should be revegetated with appropriate native plant species that match the surrounding vegetation. A 120 day establishment period and 25 month maintenance and monitoring period should be implemented including success criteria to ensure long-term survivability.

4. Cultural Resources: There is a strong possibility that the proposed project could impact cultural resources. The EIR should include discussion of efforts to minimize impacts to cultural resources. It is requested that if cultural artifacts were to be discovered on City of San Diego open space lands, that arrangements be made to provide a representative sample to the Park and Recreation Department Open Space Division, Park Ranger Program to be used for educational purposes (after required curation).

5. Noise and Vibrations: The EIR should discuss measures to protect sensitive bird species including the California gnatcatcher from noise related to proposed construction activities within and outside SDG&E's easement.

6. Recreational Resources: The project proposes activities including trenching, blasting, installation and removal of existing power poles. The EIR should discuss methods to reduce impacts to recreational resources and appropriate measures to assure public safety and the continued use of trails throughout the proposed project construction schedule. Any trails or access paths disturbed as part of the proposed project should be returned to its previous state or better once the project is completed including a 2-5% out slope to allow water to sheet off with minimal erosion.

7. Hydrology and Water Quality: The EIR should discuss methods to minimize impacts to waterways and use of required BMP's within the proposed project alignment.

8. Geology, Soils and Paleontology: It is requested that if paleontological resources were to be discovered on City of San Diego open space lands, that arrangements be made to provide a representative sample to the Park and Recreation Department Open Space Division, Park Ranger Program to be used for educational purposes (after required curation).

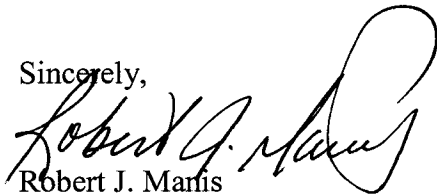
Development Section, Metropolitan Wastewater Department offers the following comment on the Notice of Preparation/Notice of Public Scoping Meeting for an Environmental Impact Report/Environmental Impact Statement for the proposed Sunrise Powerlink (SRPL) Project:

Metropolitan Wastewater Department, Barbara Salvini-Senior Civil Engineer (619-533-5106)

1. During the design stage we will need to review the projects. Please request design drawings showing all utility lines and their locations in streets or open space from SDG&E. All sewer conflicts will need to be addressed per the "City's Design Guide 2004" standards. Meetings with SDG&E may be set up with us to discuss.

Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. We ask that you please address this issue and please provide us with a copy of the draft.

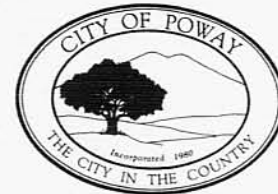
Sincerely,



Robert J. Manis
Assistant Deputy Director
Land Development Review Division

CITY OF POWAY

MICKEY CAFAGNA, Mayor
BETTY REXFORD, Deputy Mayor
MERRILEE BOYACK, Councilmember
BOB EMERY, Councilmember
DON HIGGINSON, Councilmember



November 3, 2006

Billie Blanchard, CPUC/Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Subject: Notice of Preparation of an EIR/EIS and Scoping Meetings for the Proposed Sunrise Powerlink Project

Dear Mr. Blanchard and Ms. Kastoll:

Thank you for the opportunity to review the Notice of Preparation (NOP)/Notice of Scoping Meetings for the Sunrise Powerlink project EIR/EIS. The City of Poway's Development Services Department has reviewed the Notice of Preparation and offers the following comments and local perspective for consideration by the State Public Utilities Commission (CPUC) in the preparation of the Draft EIR/EIS.

- **Biological Resources:** The Sunrise Powerlink project is located within the City of Poway Subarea Habitat Conservation Plan area. The report should discuss potential biological impacts and mitigation measures associated with the loss of habitat resulting from the construction of the new tower system.
- **Hazard and Hazardous Materials:** The City concurs and encourages greater analysis on the potential dangers associated with wildfires caused by arcing or breaking of the transmission lines. This is especially true in Poway, as the project proposes increasing the number of lines and the amount of power within the lines that are located above dense native vegetation within the existing utility easement.
- **Land Use:** Discuss the potential land use conflicts/compatibility issues between the high amperage power lines and their proximity to single-family homes.
- **Socioeconomics:** The NOP speaks to potential additional property taxes that could be provided to local jurisdictions. The Draft EIR/EIS should also discuss the potential loss of property values by those property owners located in proximity to the Sunrise Powerlink project.
- **General Issues:** While the potential health hazards associated with electromagnetic fields (EMF) remain in dispute, the CPUC should recognize this issue as a significant concern expressed by most homeowners living adjacent to the proposed power lines and the Draft EIR/EIS should discuss potential alternatives to minimize these impacts.

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Additional Considerations

The City of Poway is located midway between the Sycamore Substation and the Peñasquitos Substation, and within the Coastal Link of the project. As the power lines leave the Sycamore Substation, they proceed in a northwest direction through the City of San Diego's 1,000-unit, single-family StoneBridge subdivision, through the City of Poway's 200-unit, single-family Rolling Hills Estates subdivision, and onward into the residentially developed communities of Sabre Springs and Rancho Peñasquitos. As noted in the attached photograph, the locations of the existing power lines are very close to many of the homes; in some cases less than 80 feet. In the Poway segment, the towers are inappropriately offset to the north side of the utility easement, adjacent to the homes.

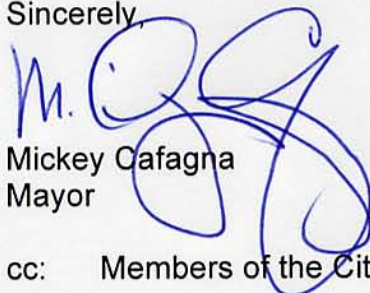
Between San Diego's Scripps Ranch and Poway's Rolling Hills Estates, the existing narrow utility easement contains several SDG&E circuits, including a 69kV, a 138kV and a 230kV, cumulatively carrying approximately 437kV of power. The proposed Sunrise Powerlink project would increase the capacity to 667kV or more, by adding one or two additional 230kV lines on a new 120-foot-high tower. The City of Poway and the Rolling Hills Estates community believe this to be cumulatively significant in terms of visual impact, noise, EMF, a blemished natural setting, and a negative impact to property values.

We strongly urge that the CPUC consider mitigating this real problem by placing, at minimum, the incremental 230kV Sunrise Powerlink circuits, or preferably all utility lines within this corridor segment, underground. To accommodate this request, it is suggested that SDG&E use the existing roadway franchise, utility easement, and rights-of-way to route and/or underground the Sunrise Powerlink lines away from these homes.

The validity to undergrounding the incremental, or all of the power lines, is equal to that of the SDG&E approved undergrounding of the Sunrise Powerlink power line in the Rancho Peñasquitos and Ramona areas. In fact, we believe this to be a higher priority to mitigate the significantly higher-voltage 667kV transmission lines adjacent to homes, as opposed to mitigating single 230kV lines proposed for Rancho Peñasquitos and Ramona.

Thank you for your time and consideration of our concerns. Should you have questions regarding these comments, please contact Jim Lyon, Senior Planner, at (858) 668-4657 or jlyon@ci.poway.ca.us.

Sincerely,


Mickey Cafagna
Mayor

cc: Members of the City Council



100 feet

77 feet

85 feet

Existing power lines



Treadwell Drive

Lattice Tower