

Rancho Bernardo Community Planning Board

P.O. Box 270831, San Diego, CA 92198

www.rbplanningboard.com

June 1, 2017

Mr. Robert Peterson
California Public Utilities Commission
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

RE: Notice of Preparation of a Draft Environmental Impact Report for the Pipeline Safety and Reliability Project (New Natural Gas Line 3602 and De-Rating Line 1600)

Dear Mr. Peterson:

The Rancho Bernardo Community Planning Board (Planning Board) appreciates the opportunity to review the Notice of Preparation (NOP) for the draft Environmental Impact Report (EIR) that will be prepared to address the impacts to the environment of implementing the proposed Pipeline Safety and Reliability Project (Application No. A.15-09-013). This proposal involves the construction a new 36-inch-diameter high pressure natural gas transmission line and associated above and below ground facilities. The pipeline (Line 3602) will extend from SDG&E's existing Rainbow Metering Station in Rainbow, CA to a tie-in within MCAS Miramar, and will be installed within Pomerado Road through Rancho Bernardo. The proposal also involves the de-rating, or lowering of pressure within an existing transmission line (Line 1600), built in 1949, that extends through existing residential neighborhoods in Rancho Bernardo.

The proposed project and the impacts associated with its implementation are of considerable interest to the community of Rancho Bernardo because the proposed Line 3602 will be constructed within Pomerado Road, a major transportation facility within the community that runs north/south through or along the eastern edge of the community. In addition, the existing Line 1600 extends through various neighborhoods within the community, in many cases immediately adjacent to existing residences, churches, and shopping centers. The Planning Board also has an interest in the potential effects of the project on natural and cultural resources and trail access within the vicinity of the Lake Hodges segment of the San Dieguito River Park, an area frequented by residents of Rancho Bernardo. Pomerado Road also runs in front of Palomar-Pomerado Hospital and medical center. These are vulnerable facilities that are of significant importance to Rancho Bernardo residents.

Presented below are the comments approved (by a vote of 11-0-0) for submittal to the California Public Utilities Commission in response to the NOP at the Planning Board's meeting of May 31, 2017.

1. Project Description

Section 15124 of the California Environmental Quality Act (CEQA) Guidelines states that a “clearly written statement of objectives” should be presented in the project description, along with the “underlying purpose of the project.” It is unclear from the information presented in the NOP what the ultimate intentions of SDG&E and SoCalGas are with respect to the proposed pipeline. The first objective is to implement pipeline safety requirements for Line 1600. That can and should be accomplished whether the remainder of the project is implemented or not. The second objective addresses minimizing dependence on a single pipeline, yet the two pipelines would serve different purposes, one a high-pressure natural gas transmission line and the other a low-pressure distribution line (a line that has been in place as a high pressure natural gas transmission line since 1949 with no apparent need for a major distribution line until now). The third objective is to enhance operational flexibility by increasing system capacity. In light of a statement made by Patrick Lee at Sempra Energy on May 25, 2017 (KPBS.org) that the technology exists today for a total reliance on renewable energy, the need to increase the transmission of natural gas into San Diego County seems limited. In fact, the use of natural gas in the area is projected to decrease, not increase. If there are other objectives associated with this project that SDG&E and SoCalGas have not disclosed, they should be addressed in the draft EIR. Based on the current objectives, it appears that there would be a range of alternatives that could achieve the stated project goals, eliminating the long-term impacts associated with the generation of greenhouse gases, as well as avoiding the project’s short-term impacts (e.g., traffic congestion, dust [particulate] emissions, tailpipe emissions, greenhouse gases, temporary loss of trail access, impacts to sensitive habitat).

To ensure comprehensive evaluation of the impacts associated with the proposed project, the draft EIR should include a complete description of the intended purpose and need for the new transmission line and the need for the continued use of Line 1600 as a distribution line. All of this information is essential in understanding the environmental implications of the proposal as it related to growth inducement, greenhouse gas emissions, and the ability to achieve the goals of the California Climate Strategy. It will also allow for analysis of the degree to which California’s energy resources could be depleted as a result of the sale of natural gas to outside parties, including other countries, should that be determined to be a component of the overall project objectives.

The CEQA guidelines also require that the description of the project contain all of the information needed for evaluation and review of environmental impacts. As a result, we request that the Project Description provide detailed information about construction phasing and implementation. At a minimum, the following information should be provided:

Line 3602 - Project phasing; the length of roadway (or trail) that will be impacted at any given time and for how long; the width of roadway to be affected; construction hours; staging of equipment; handling or stockpiling of excavated soil; locations and construction activities for all other project components, along with design and screening proposals for all above-ground facilities; traffic control plans; any proposal for a construction information hot-line; need for full closures (and for how long) of roadway segments or at intersections (e.g., Pomerado Road and Caminito De La Gallarda and Pomerado Road and the south entrance to the Albertson’s shopping center) where considerable work appears to be necessary in the intersection; schedule for implementing roadway repairs; any construction needs within existing center medians and/or landscaped sidewalk strips; assurances that the roadway will be returned to a condition equal to

or better than its preconstruction condition. The locations of major laydown and equipment staging areas along the alignment should also be identified.

Line 1600 – Describe when in the process, safety testing on this line would be conducted. Will it occur before the new line is proposed to cross the existing line the vicinity of Pomerado Road and Bernardo Trails? This would avoid the need to tear up the road again to implement repairs on Line 1600 at this location should they be deemed necessary. If repair of the existing pipeline (1600) is to be covered by the current EIR, then the document must also describe what those repairs might be and how they would be implemented, particularly in areas where the pipeline extends through existing neighborhoods.

2. Environmental Effects

Traffic and Transportation: In reviewing the information provided on the CPUC website for this project, a significant portion of the roadway will be affected during construction, likely causing four-lane Pomerado Road to be reduced to two-lanes. The traffic analysis should disclose the time delays that will result on the various segments of Pomerado Road and the associated impacts to both residential streets and other community circulation roadways that will be used by motorists as alternative access routes during construction. Traffic congestion as a result of construction should also be analyzed for surface streets and I-15 in the vicinity of the Pomerado Road/Highland Valley Road interchange.

The effects on access to schools, hospitals and other medical facilities, community centers, churches, and commercial areas should also be addressed, and mitigation measures should be incorporated into the project design to minimize delays in access to these facilities. Installation of water lines associated with the Poseidon desalinization project resulted in significant traffic delays (more than 30 minutes in some locations). The draft EIR for that project stated that no significant impacts to traffic would occur. We believe that delays of that magnitude within Rancho Bernardo and elsewhere along Pomerado Road would represent a significant impact and should be addressed accordingly.

Mitigation measures should be proposed to ensure safe access out of all neighborhoods and clear routes for emergency vehicles exiting Rancho Bernardo for Pomerado Hospital. Construction start and stop times should take into consideration access to schools and traffic volumes during commute hours in order to minimize the extent of disruption to communities.

Similar information and analysis should be provided for any construction activity that could be associated with repairs to Line 1600.

Traffic Congestion in Case of Emergency Evacuation: Residents of Rancho Bernardo live under the constant threat of wild fires extending from areas to the East. Pomerado Road is the only way for residents of several communities east of Pomerado Road to leave their subdivision in case of an emergency order to evacuate such as that which was ordered in advance of the disastrous fire of 2007 which devastated large parts of Rancho Bernardo.

These communities were ordered to evacuate at 5:00AM. Under then existing Pomerado Road conditions, Oaks North community residents reflect that it took more 45 minutes to go the 1/2 mile to reach Pomerado because of traffic congestion. Any additional thwarting of traffic flow on Pomerado Road due to pipeline construction could further disrupt traffic flow making it more difficult for residents of these Rancho Bernardo neighborhoods to evacuate and escape the threat of fire to life and property.

Noise and Vibration: Construction activity occurring in proximity to residential development and other sensitive noise receptors will result increases in the ambient noise levels during construction. Anticipated noise levels should be disclosed, and, if necessary, appropriate mitigation measures should be incorporated into the project. If night work is proposed, additional measures should be incorporated as appropriate. This section should also address the potential for impacts related to vibration during construction, particularly in association with work necessary to properly compact the soil around the pipeline. Potential noise impacts from activity occurring in association with laydown and equipment staging areas should also be addressed.

Similar information and analysis should be provided for any construction activity that could be associated with repairs to Line 1600.

Public Utilities and Other Community Facilities: A discussion of potential impacts to existing underground utilities should also be addressed, as well as any potential need to temporarily suspend service from one or more utilities. In addition, in 2012, the community identified the need for the installation of storm drains in the vicinity of the intersection of Pomerado Road and Pomerado Court and Pomerado Road and Mirasol Drive, where water currently collects on Pomerado Road during measurable rainfall events. The draft EIR should address how the current proposal could impact the City's ability to install new storm drain facilities at this location in the future. Finally, Green Valley Creek (now channelized and undergrounded in some areas of the community extends under Pomerado Road in the vicinity of its intersection with Rancho Bernardo Road. If construction could result in temporary interruptions of flow within this storm drain, how will properties and the public right-of-way upstream of this area be protected during its closure?

Aesthetics: The document should describe changes to existing community character as a result of installing significant above ground components such as mainline valves or regulator stations. Mitigation measures such as decorative walls and landscaping screening should be included, as necessary, to minimize impacts to community character and aesthetics. Temporary impacts to aesthetics associated with laydown and equipment staging areas should also be addressed.

Recreation: Information on the CPUC website for this project indicates that the primary access to the Mule Hill Trail (a portion of the San Dieguito River Park Coast to Crest Trail) will be closed for several months during construction. This represents a significant adverse effect that impacts trail users' ability to access the eastern portion of the Lake Hodges area from Escondido and Rancho Bernardo. The draft EIR needs to address this issue and identify potential options for temporarily facilitating alternative trail access in this area. The document should also address the need to protect existing interpretive areas along the affected trail segment. The project should be required to restore the existing trail to its current firm and stable condition.

Biological Resources: The potential for temporary and permanent impacts to sensitive habitats, including coastal sage scrub and riparian wetlands, from construction within the Lake Hodges watershed between Bear Valley Parkway and Highland Valley Road should be fully evaluated. Most, if not all, of this area is located within the City of San Diego's Multiple Species Conservation Program cornerstone lands, therefore, appropriate mitigation measures must be implemented to avoid impacts to sensitive habitats. If impacts cannot be avoided, the draft EIR should identify mitigation measures that would adequately address the anticipated impacts. The draft EIR should also state how the implementation of the required mitigation would be assured.

Cultural Resources/Paleontological Resources: Although the majority of the construction will occur in the public right-of-way, because of the depth of construction, there is still the potential to encounter previously unrecorded cultural resources and/or paleontological resources. Rancho Bernardo includes a number of significant cultural resources, many of which occur in proximity to the construction site. In addition, the area between Bear Valley Parkway and Highland Valley Road was once the location of the town of Bernardo, is located in proximity to historical Mule Hill, and was home to Native Americans. The draft EIR should discuss the need for a qualified archaeological monitor and appropriate Native American cultural resource monitor during the excavation of all previously undisturbed areas.

Greenhouse Gas Emissions: As discussed above, the project involves both short- and long-term impacts related to the generation of greenhouse gas emissions. A simple calculation of greenhouse gas emission during construction would not be considered an adequate assessment of the project's overall contribution of greenhouse gases. We request that the analysis of greenhouse gas emissions also consider the added emissions, if any, that would result from the use of natural gas transmitted through Line 3602 and distributed in Line 1600 versus the amount of natural gas that would be distributed under existing conditions. The way in which the natural gas to be transmitted through this new pipeline is produced may also have implications on the project's overall contribution to greenhouse gases. For instance, production of natural gas through the use of hydraulic fracturing techniques increases the greenhouse gas footprint of natural gas production and requires the use of significant volumes of water. These topics should be analyzed in the draft EIR.

The analysis of greenhouse gas emissions should also consider the consistency of this proposal with California's Climate Strategy and the City of San Diego's Climate Action Plan. The City will also be considering establishing a Community Choice Energy program, which will transition residents and businesses to 100 percent renewable energy by or shortly after construction on the pipeline begins. This will amplify the reduction of natural gas usage.

Public Safety: Line 1600 has been in place since 1949 and is in serious need of testing. This is particularly important because this line occurs immediately adjacent to residential units in various locations throughout Rancho Bernardo. The draft EIR should identify the potential for safety impacts, as well as propose mitigation measures that would ensure that line testing occurs during the initial phase of the project under any of the alternatives.

Describe the testing procedures for a 36-inch high pressure gas line following initial installation, during the first few years of use, and address the safety of the line overtime.

The draft EIR should also address the safety issues associated with installing and maintaining a high-pressure natural gas line within an existing roadway.

3. Alternatives

The following alternatives should be evaluated in the draft EIR:

- A detailed discussion of the No Project Alternative;
- At least one alternative that addresses how the energy requirements of the region can be met with renewable resources, adequate energy storage capacity, and a more efficient and flexible transmission and distribution network;
- No construction of Line 3602, instead upgrade and continue to use Line 1600 using best in class technology (i.e. cured-in-place lining systems for existing lines) to meet the future demands for natural gas in the region;
- Examination of the potential for SDG&E and SoCalGas to utilize natural gas supplied from excess capacity in the North Baja Pipeline, a TransCanada pipeline, as an alternative to the current proposal;
- Alternative alignments that avoid or minimize the use of major transportation corridors; and
- Decommissioning Line 1600 rather than de-rating it.

Thank you again for the opportunity to provide our comments. The Planning Board requests that it be notified when the draft EIR is made available for public review and comment. We also request that the CPUC consider a 60-day public review period to accommodate organizations such as ours that only meet once a month.

Sincerely,

Robin Kaufman

Robin Kaufman
Chair, Rancho Bernardo Community Planning Board

cc: Councilmember Mark Kersey, District 5
State Senator Toni Atkins
Assemblyman Brian Maienschein