

Docket Number 10-035-39

Date: April 21, 2010

To: The Public Service Commission
and
The Utility Facility Review Board,

Reference: Utah Utility Facility Review Board
Petition For Review
Docket Number 10-035-39

I am a graduate engineer with an electronic and electrical degree and have worked in the space communications field for the Jet Propulsion Laboratory for over 40 years. My area of experience is in the NASA large ground-based communications antennas, microwave feeds, low noise amplifiers and high power transmitters. I have been involved with the electro-magnetic propagation and radiation of very high power and the reception of very low power signals used to communication with NASA's deep space missions spacecraft.

I have been involved in contract management and project management for a number of years. The management of this task to implement the transmission lines from Mona to Oquirrh appears not to have a clear set of requirements nor a sound operations concept that includes the considerations for the safety, reliability, and adequate protection of the residences and customers of Tooele county that some day may be served by this link. Currently this transmission line will not serve the Tooele areas through which it travels. It only brings power to the Salt Lake valley. No where along the corridor does it distribute power to any community through which it passes. This project has not taken a total system engineering approach to the problem of supplying power to the State and the Salt Lake Valley. If this link to the power grid were to distribute power to the communities through which it passes then additional power could be diverted to service the Salt Lake Valley through existing transmission lines.

I have been a resident of the south bench area of the city of Tooele for only about 21 months and plan to retire in this community. In this short time I have become infatuated with the city and the county of Tooele. I have built my home and invested in this community in no small measure because of the view and closeness to the Oquirrh mountains. Had the power lines been in operations before I started the building process, I would not have chosen the bench area of Tooele for my residence. It is a fact that personal residential properties near power lines loose value for their owners and these low property values produce less revenue for the city and county in which they reside.

Rocky Mountain Power (RMP) did not include all the necessary document, construction and mitigation plans and the final environmental Impact Study (EIS) documents with it application for the Conditional Use Permit (CUP). Too many questions were left unanswered. The County Of Tooele had no choice but to deny the application. The Utah Utility Facility Review Board should not be ruling on this matter until application has been submitted properly and the county has time to review the matter and make its final

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judgment. RMP has circumvented the CUP process by prematurely petitioning this board for a disposition on this matter.

I believe the county commissioners have arrived at the correct decision to deny Rocky Mountain Power's application for the Conditional Use Permit (CUP) to build and operate the transmission line from the Limber Substation east across Tooele's southeast bench area to the county line. Rocky Mountain Power (RMP) and their contractors have acted in an unethical manor, if not engaged in illegal practices during the process of developing their proposal and site selection. They were caught by the county sheriff extracting water from the Tooele water reservoir without permission in the 2009 drought year. They had made no attempt to acquire permission for the use of the water while Tooele city residences were asked to limit their water usage to conserve water. There has been what appears to be an overt effort to exclude or otherwise down play significant facts from the proposal and draft Environmental Impact Study (EIS) that would eliminate this route from consideration. Why should the county suggest any alternate route when RMP has already laid out all the alternatives? If the county suggests any acceptable alternatives, RMP would assess the county all the additional of construction. That is unfair to the county and it residence. RMP should offer an alternative as the price of county acceptance and maintaining they construction schedule.

RMP has not exercised duo diligence in their development of this proposal to build the transmission line system between the limber and the Oquirrh Substations. There are alternate routes that were considered and discarded for no other reason but cost. The route RMP has choice to propose puts the county residents at risk. Their preferred route places the high voltage lines across the Tooele City water reservoir and natural springs which provides a major part of the city's drinking water. This close proximity to our source of water and the RPM practice of using herbicides to suppress plant growth beneath the power lines will contaminate the City's drinking water supply. This route also transverses the International Smelter and Refining SUPERFUND site. The ground on which RMP will transverse contains lead and arsenic among other things that will endanger the area's population and the workers and crews doing the construction and maintenance on the line. RPM is not promoting the health and safety of neither the area residents nor the construction and maintenance crews as proclaimed in the subject petition for review (Docket Number 10-035-39). I can not believe that RMP did not know before hand or discover this fact in their proposal development process. This fact was not addressed in any of the town meeting nor in documents presented in supporting of this proposal. These facts were not brought forth in the meeting held at the Tooele County Health department where other health issues and concerns were discussed at some length. There is no evidence that RMP has applied to the Environmental Protection Agency (EPA) for approval to build on the SUPPERFUND site. If RMP had been up front with all the facts, they would have presented the hazardous waste issue and the process they would use to deal with the issue. The draft of Environmental Impact Study (EIS) did not address this major issue. It is not even included in the documents index or table of contents.

The first draft of the EIS has numerous errors such as these. The document also significantly understates the growth and planned growth for the southeast bench area which will be stifled if the transmission lines are allowed to cross the bench area. The final draft has not been released as of this date and there is no way to determine if the errors have been corrected.

RPM has studied several alternate routes. Each of these alternates has some pros and cons associated with them. As the citizen's Group has reviewed the EIS and all other documents that RPM has made available to the group, the route up the west side of the valley and across through Lake point seems to present fewer obstacles to its construction and operations. This alternate route provides better access to the tower on flatter ground and should lower the cost of road construction and transportation of materials to the construction sites to offset the other increase in costs. The citizens group has suggested this route as an acceptable alternate. RPM has rejected this suggestion as too costly and provided a cost comparison summary to support their conclusion, however the comparison was not complete several items were omitted. The current cost estimates and project budget has not been made available to determine if the cost analysis and comparisons are fair and accurate. One of these items that would not support their conclusion is the construction of access roads. The west valley route is much flatter. The road construction costs would be much cheaper up the valley than through the mountains given the need to move heavy cranes and other equipment to the tower construction sites.

The citizens group has discovered that Nevada Power is planning to construct a 500 KV transmission line across northern Nevada and enter the Tooele valley just north of the Stansberry mountains and then run south along the west side of the valley to the Limber substation near the southwest corner of the Army Depot. If RPM were to construct the lines up the west side of the valley and locate the substation in the northwest corner of the valley, then Nevada power would not have to run that segment of their line. Having the substation in the northwest corner of the valley would place it closer to the industrial area most likely to be developed first and need additional power in the near future. Then, the Mona to Oquirrh or Mona to Terminal lines would not have to transit the Oquirrh mountains with its costly access roads and mountain towers nor contend with mitigation of the superfund site.

The citizen group does not oppose the transmission line through the Tooele valley and the need to deliver power to the ever growing Salt Lake Valley, but we do oppose the proposed route across the southeast bench. I conclude from the preponderance of the evidence provided by RPM that this Board should deny this petition and recommend that RPM reconsider an alternate route along the west side of the Tooele valley and resubmit their application for the CUP for consideration by Tooele County.

Thank you for your considerations in this matter.

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