

County of Imperial

Building Roads into the Next Century

PUBLIC WORKS DEPARTMENT

February 19, 2008

CPUC/BLM c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104

SUBJECT:

Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment; San Diego Gas & Electric Company (SDG&E) Sunrise Powerlink Project

This letter is in response to the January 2008 Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment SCH No. 2006091071, DOI Control No. DES-07-58 received January 7, 2008. The project consists of the construction of a new 91-mile, 500 kilovolt electric transmission line from the Imperial Valley Substation in Imperial County, near the City of El Centro, to a new Central East Substation in Central San Diego County, southwest of the intersection of San Diego County Highways S22 and S2. In addition to a new 59-mile 230 kilovolt transmission line from the new Central East Substation to the existing Peñasquitos Substation in the City of San Diego.

Department staff reviewed the document and offers the following comments regarding the Imperial Valley Link of the above-mentioned project:

- 1. Of concern are the potential impacts that the proposed Imperial Valley Link component of the project and its potential alternatives may have on various segments of the following County roads:
 - Evan Hewes Highway
 - Imler Road
 - **Huff Road**
 - Vaughn Road
 - Hardy Road
 - Stevens Road
 - Jeffery Road
 - **Dunaway Road**
 - Reynolds Road
 - Payne Road
 - Wheeler Road

However, the proposed mitigation measures seem to adequately address the project's impacts on County roads, along with a County encroachment permit. Furthermore this department considers the transmission line path named SDG&E West of Dunaway Alternative, to be of lesser impact in the generation of additional construction-related traffic on the County's roadways than the others proposed.

- 2. A transportation permit shall be required from this department for any hauls of heavy equipment and large vehicles, due to construction activities, which impose greater than legal loads on County roads and bridges.
- 3. An Encroachment Permit shall be required from this Department for any proposed access and/or improvement being constructed onto, into or within County road right-of-way(s). This include but is not limited to above and below ground utilities, storm drains, water and sewer lines and appurtenance within road right-of-way(s). All improvement plans will need to be reviewed and approved by this Department as well. Consideration of storm water Best Management Practices (BMPs) and construction warning signage must be addressed.
- 4. A Grading and Drainage Study/Plan to provide for property grading and erosion control shall be required which shall also include prevention of sedimentation or damage to off-site properties (and storm water retention for a 100-year storm event). The Study/Plan shall be submitted to this Department for review and approval and the applicant shall implement the approved plan. Employment of the appropriate storm water Best Management Practices (BMP's) shall be included. Concern that drainage washes be considered as well as perched groundwater. NOI and SWPPP will be required.
- 5. Please be advised that this Department reserves the right to add additional comments as the project develops and more detailed information is available.

Should you have any questions, please do not hesitate to contact, Donald Vargas, Administrative Analyst I of this office. Thank you for the opportunity to review and comment on this project

Respectfully,

William S. Brunet, PE Director of Public Works

Frank Fiorenza

Deputy Director of Public Works - Engineering

DV/dm

BY:

cc: Jurg Heuberger - Director, Planning & Development Services Dept.