



April 10, 2008

Ms. Billie Blanchard, CPUC
Ms. Lynda Kastoll, BLM
C/O Aspen Environmental Group
235 Montgomery St., Suite 935
San Francisco, CA 94104

Re: Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH #2006091071, DOI Control No. DES-07-58, January 2008 (Draft EIR/EIS)

Dear Ms. Blanchard and Ms. Kastoll:

The Imperial County Farm Bureau (ICFB) hereby submits the following comments on the Draft EIR/EIS for the SDG&E Sunrise Powerlink Project ("Powerlink"). ICFB is a voluntary, non-profit corporation representing approximately 800 members, most of which are farmers and ranchers in the Imperial Valley. Agriculture is responsible for more than \$1 billion in gross production value in Imperial County and supports thousands of jobs. These comments are directed at the potential impacts the Powerlink could have on agriculture and land use in the Imperial County.

Impacts to Dairies

For more than a decade, the County of Imperial, along with numerous other organizations such as ICFB, have worked together to attract dairies impacted by urban encroachment in other areas to relocate to the Imperial Valley. The area on the western edge of the valley, in which SDG&E has proposed their preferred Northern Route for the Powerlink, has been designated as an ideal place for these dairies for a variety of reasons. There are currently two dairies and calf/replacement heifer ranches located in this "Dairy Corridor" and there are two additional dairies with plans to build in the area. Because SDG&E was using outdated maps, they were unaware of the existence of these dairies as well as other operations and homes now located in the path of the proposed Powerlink. The original Northern Route went right over the top of the Bullfrog Farms dairy. SDG&E has since modified the route slightly, as shown in Figure B-3 of the DEIR, but now it goes right over the top of the calf ranch. One variation of the route is also approximately ¼ of a mile from the KF Dairy on Jeffrey Road. The "Dairy Corridor" as envisioned, planned for, and invested in would be devastated by the presence of a huge electrical line.

The impacts of stray voltage on dairy cattle have been well documented. The discussion on p. D-60 of the DEIR, Exposure of Livestock to Stray Voltage and Electric and Magnetic Fields, does not distinguish between livestock in general and dairy cattle. ICFB provided Aspen Environmental

Group with copies of numerous studies demonstrating the impacts of high voltage lines during the last round of scoping comments in 2006 and would be happy to do so again if requested. Several things that should be noted when reviewing these studies are that dairy cows are much more sensitive to stray voltage than feedlot cattle; due to a smaller body frame, Jersey cows, like those in the dairies of concern, are more sensitive than the common Holstein; and today's precision-bred, "high genetics" animals may be more sensitive to even low levels of electrical voltage and fields than those used in studies decades ago. Some of the impacts of stray voltage on dairy cows include but are not limited to decreased milk production, reduced reproductive efficiency of cows, more difficult behaviors requiring more intensive cow management and increased medical costs due to reduced immunity to stress and disease. Additionally, abnormally high cow and calf mortality rates could be anticipated due to electricity-induced causes such as increased incidence of disease, higher production of somatic cells, adrenal stress and imbalances in cerebrospinal fluid of electrolytes and proteins.

The Van Leeuwens, owners of Bullfrog Farms, have determined based on studies and real-life experience, that they would lose approximately ten pounds of production per cow per day due to impacts from the electrical line. Based on 3200 cows and \$17/hundred weight milk, that equates to a loss of \$5,440 per day and \$1,985,600 per year. They anticipate approximately 100 cows to perish due to the electricity in addition to the normal death rate (about double). Each cow has a value of \$2000 for a total loss of \$200,000 per year. If the cost of decreased productivity is added to the loss due to deaths it amounts to \$2,185,600 per year. A 3200 cow dairy cannot survive a loss of this magnitude. It will surely put them out of business and avert any other dairies considering relocation to the Imperial Valley.

This 500 kV line should ideally be five miles from any dairy or livestock operation – one mile away at the absolute minimum.

Relative to the impacts on dairy operations are the subsequent impacts to Imperial Valley Cheese. Imperial Valley Cheese of CA is one of two producers of Muenster in the state and is the only California commercial producer of Swiss Cheese. Critical to the operation of this plant is the dependability of its milk supply. The location of the plant was chosen due to its close proximity to the existing dairies and because of the understanding of Imperial County's intentions of attracting dairies to this "Dairy Corridor." In addition to supply dependability and the cost of milk transportation important to the success of the cheese plant, the quality of milk is also a significant factor. Several research studies have indicated reductions in butterfat and increased variability in milk components in milk from cows exposed to electrical fields. Variations in milk component percentages cause more time, effort and expense to go into producing the cheese.

Impacts to Growing Crops

In addition to dairies, approximately 500 acres of farming operations with crops in Imperial County would be negatively impacted by the 500kV Powerlink traversing or running adjacent to their land. If the Powerlink were to divide a field it could inhibit access as well as water delivery which would be detrimental to the ability to farm the land. This would also negatively affect the value of the farm ground.

Aerial application of chemicals to crops is a common and necessary practice in Imperial County and the location of the line could be dangerous to pilots and hinder the ability to proceed with this practice.

The Powerlink could also impact the ability for landowners to have flexibility in the crops they choose to grow on their land. For example, the citrus industry in Imperial County is growing and flourishing, however, land suitable for citrus trees is limited. The land in the area of the proposed northern route would be conducive to raising citrus trees for a variety of reasons but predominately due the light soil type, and there are currently farmers considering planting them there. This option could be limited for the landowners should the Powerlink be built there.

Impacts to Residents and Employees

There are numerous rural homes as well as large agricultural businesses in the vicinity of the northern route. All potential health impacts to these residents and employees to need to be thoroughly evaluated and taken into account.

Concluding Remarks

ICFB strongly encourages the CPUC and Aspen Environmental Group to thoroughly review all potential impacts to agriculture operations, residents, employees and land values in all areas being considered for the Powerlink. Additionally, an evaluation of implications of the Powerlink on the hindrance of future agriculture development in this area should be conducted. All proposed mitigation measures should be discussed with the owners of the operations in question to determine feasibility of such suggestions.

Thank you for the opportunity to comment and express our concerns regarding the location of the proposed SDG&E Sunrise Powerlink. While ICFB has not taken a position on the project itself, it is adamantly opposed to the Northern Route, or any route that would pose such detrimental effects to our community. We believe there are options for a project of this nature that do not include such disproportionate negative repercussions to our community, particularly this important agricultural area, as the Northern Route.

If you have any questions or would like to request follow-up materials, please feel free to contact me.

Respectfully submitted;



Nicole M. Rothfleisch
Executive Director