

Comment Set A0010

Imperial Irrigation District



IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P. O. BOX 937 • IMPERIAL, CALIFORNIA 92251

March 3, 2008

Project Managers
California Public Utility Commission/Bureau of Land Management (CPUC/BLM)
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Subject: Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and
Proposed Land Use Amendment for the Sunrise Power link Transmission Line
Project

Dear Project Managers:

Imperial Irrigation District (IID) Water Department completed review of the subject Draft EIR/EIS for the Sunrise Power Transmission Line Project. San Diego Gas & Electric Company (SDG&E) proposes to construct a new 91-mile, 500 kilovolt (kV) electric transmission line from Imperial Valley Substation to a new Central East Substation and a new 59-mile 230 kV transmission line that includes both the overhead and underground segments from the new Central East Substation to SDG&E's existing Penasquitos Substation in the City of San Diego. Below are comments to this Draft EIR/EIS:

- 1) In the Project segment of Imperial Valley Link Alternatives on pages ES-40 and ES-47, there are potential impacts to IID's water facilities for the 2 alternatives presented. These alternatives are the Flat-Tailed Horned Lizard (FTHL) Eastern Alternative and SDG&E West Main Canal (WMC) – Huff Road Modification Alternative.
- 2) The FTHL Alternative would potentially impact **Westside Main Canal, Forgetmenot Canal, Foxglove Canal, Forgetmenot Drain and Dixie Drain No. 4**. Figure ES-12 indicates that the proposed 61-miles of transmission line would cross these canals and drains.
- 3) SDG&E WMC – Huff Road Alternative would potentially impact the **Westside Main Canal, Fillaree Canal and Fillaree Drain**. The 4.9-mile long alternative transmission line would cross these canals and drain as indicated in Figure ES-12.
- 4) Other potential impacts to the above alternatives include impacts to farm facilities such as tile drains, head ditches, farm roads, etc. There will be other potential environmental impacts that have to be evaluated such as habitats of endangered species where these transmission lines will cross.

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- 5) The developers must obtain a copy of the IID Water Department Developer Project Guide 2007 (Developer Guide), which addresses general, irrigation and discharge issues and mitigation of impacts with regard to IID's irrigation and drainage systems. This document also details how a project is processed through the Water Department. This guide includes the following: Standard drawings for connection to IID drainage systems, utility crossings standard details, encroachment permit application and other forms that may be applicable to the project. The Developer Guide can be obtained at the following address:

A0010-5

IID Water Engineering Services
333 East Barioni Boulevard
Imperial, CA 92251
(760) 339-9256

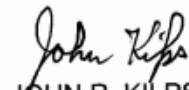
An electronic version of the Developer Guide is available on the IID website at:
<http://www.iid.com/water>.

- 6) The developers should include any new or reconstructed IID facilities required for and by the project, (which can include ancillary utility work such as electrical lines or drainage structures) in the project's CEQA documentation. As a result the developers should contact IID so that we may further discuss these various issues with them. IID's Energy Department should be contacted regarding power issues at 760-482-3400.

A0010-6

Thank you for the opportunity to review this matter. If you have any questions regarding these comments, please contact me at (760) 339-6290.

Sincerely,


JOHN R. KILPS, P.E.
Supervising Engineer
Water Engineering

FV:cr

cc: Supervisor, Real Estate
Supervisor, Environmental Compliance
Superintendent, Southend Water Division
Project Management, Water
Key Customer Coordinator

**Comment Set A0010, cont.
Imperial Irrigation District**



VIA E-MAIL

Ms. Billie Blanchard, California Public Utilities Commission
Ms. Lynda Kastoll, United States Department of Interior, Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: Imperial Irrigation District's Comments on the Sunrise Powerlink Project Draft
EIR/EIS

Dear Ms. Blanchard and Ms. Kastoll:

The Imperial Irrigation District (IID) provides the following comments on the San Diego Gas and Electric (SDGE) Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

I. Introduction

A. The Draft EIR/EIS

On January 3, 2008, the California Public Utilities Commission (CPUC) and the U.S. Department of Interior's Bureau of Land Management (BLM) released a Draft Environmental Impact Report/Environmental Impact Study (Draft EIR/EIS) on the Sunrise Powerlink Project (SPL). The Draft EIR/EIS analyzes the environmental impacts of San Diego Gas and Electric's (SDGE) proposed SPL as well as various alternatives that were developed as a result of public and agency input during the scoping process. The Draft EIR/EIS document is more than 7,500 pages long and ranks seven different generation and transmission alternatives. SDGE's proposed project ranks sixth on the list of seven ranked alternatives.

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Imperial Irrigation District (IID) appreciates this opportunity to provide its comments on the Draft EIR/EIS. IID commends the Draft EIR/EIS Team on its preparation of a comprehensive, well-balanced document. It presents a thorough analysis of the environmental impacts of the proposed SPL and alternatives. For the most part, IID agrees with the conclusions set forth in the Draft EIR/EIS. There are several areas addressed in the Draft EIR/EIS that IID seeks to clarify through these comments.

IID has a strong interest in the route selected for the Imperial Valley portion of the SPL, since that route will traverse lands in Imperial County. As a publically owned irrigation district, IID must ensure that impacts to the Imperial Valley farming and dairy communities from the SPL are kept to a minimum. This is especially true due to the unique nature of the Imperial Valley farming community, which relies upon a complex system of irrigation canals, underground tile lines and drains in order to irrigate its crops. IID submits that the route selected should utilize existing utility corridors and existing private rights-of-way to the fullest extent possible in order to minimize the impact upon valuable farmlands and agriculture operations – the lifeblood of the Imperial Valley.

B. About the Imperial Irrigation District

IID is an irrigation district organized under the law of the State of California¹ and, as such, is a political subdivision of the State of California. Established in 1911, IID is the nation's largest irrigation district, providing both electric and irrigation services to more than 135,000 customers across 6,000 square miles of California's desert southwest in Imperial and Coachella Valleys. IID owns and operates an electric transmission grid in its service area and 480 megawatts of natural-gas fired generating capacity in California and Arizona. Currently, IID is

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¹ California Water Code §§ 20500-29978, known as the Irrigation District Law.

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in the process of upgrading its transmission system to facilitate the export of renewable energy from the Imperial Valley.

A0010-7 cont.

IID has been at the forefront of promoting renewable energy transmission for many years. In the heart of Imperial Valley lies one of the largest geothermal resources in North America, the Salton Sea resource area. Over fifteen years ago, IID upgraded its transmission system in order to interconnect new geothermal generation that was being built in the Imperial Valley and export this renewable energy to Southern California Edison. At that time, IID upgraded its transmission system by building a collector system – called the KN/KS line – to interconnect new geothermal generation that was being developed in the Imperial Valley. The KN/KS line was built in excess of the needed capacity since IID anticipated additional renewable generation development. Therefore, IID has excess capacity on its collector system that can be used to wheel renewable generation. At present, IID wheels approximately 500 MW of geothermal generation into the California Independent System Operator (CAISO) control area.

IID continues to be a strong supporter of the development of renewable energy. IID was a major participant in the Imperial Valley Study Group (IVSG). The IVSG was a voluntary planning collaborative made up of regional stakeholders that met to develop a phased plan for the development of the necessary transmission to export up to 2,200 MW of renewable generation from the Imperial Valley region. The IVSG identified various transmission reinforcements that needed to be made to IID's transmission system in order to facilitate the export of renewable energy out of the Imperial Valley. These reinforcements have been included in IID's transmission planning and incorporated into IID's Transmission Expansion Plan (TEP). IID is moving forward with its TEP and is working closely with its neighbors to develop new transmission projects to enhance the export of renewables to other parts of Southern California

Comment Set A0010, cont. Imperial Irrigation District

and Arizona. For example, IID's Board of Directors has recently approved the following three projects:

- a 230kV transmission line from the Midway substation to a new Bannister substation;
- a 230 kV transmission line from the Imperial Valley (IV) substation to Dixieland substation; and
- a joint transmission project proposed by Arizona Public Service, Salt River Project, Wellton Mohawk Irrigation District and IID for a 500 kV transmission line from the Palo Verde Hub to the North Gila substation near Yuma, Arizona.

These three projects will significantly increase the capability of IID to export renewable energy to its neighbors in Southern California and Arizona.

In addition, IID is also a partner in the Greenpath North transmission project which is a 500 kV transmission line interconnecting IID's system and Los Angeles Department of Water and Power's (LADWP) system. IID is also working with SCE to increase the rating of WECC Path 42 to provide an additional 200 MW of export capability from IID's system into SCE's system.

As noted above, IID has already invested significant amounts of engineering analysis and money in its existing collector system and has plans to invest additional amounts in the TEP. For example, IID's Midway to Bannister project represents a commitment to invest \$75 million by IID into transmission upgrades. IID's investment in transmission upgrades will enhance the ability to export renewable energy from the Imperial Valley. SDGE's preferred route will traverse valuable agricultural lands in the Imperial Valley in close proximity to existing IID transmission facilities. If the SDGE preferred route or the Environmentally Superior Northern Route Alternative (Northern Routes) are selected, the SPL will run within 18 miles of the same geothermal resource area where IID transmission is already located and, in fact, will be only

A0010-7 cont.

A0010-8

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three miles from an existing IID 161kV transmission line. This puts IID's investment in transmission to facilitate the export of renewables at risk of being stranded. The combination of a new 500 kV line traversing close to the Salton Sea resource area – that will be under the control of the CAISO – and the CAISO's ability to socialize the cost of trunkline gen-ties across the entire CAISO, presents a serious risk of bypass for IID and the potential for millions of dollars in stranded investment. Such actions would not be in the best interests of either the CAISO's ratepayers or IID's ratepayers. It does not make sense to build duplicate transmission facilities when IID already has an existing transmission system that has the ability to interconnect and export additional renewable generation.

A0010-8 cont.

II. IID Supports Selection of the Environmentally Superior Southern Route (SWPL) Alternative.

A0010-9

The highest ranked transmission alternative that provides a direct connection from SDGE to the IV substation was the Environmentally Superior Southern Route Alternative (Southern Route). IID supports selection of the Southern Route since it meets the project objective of providing SDGE access to Imperial Valley renewables and has the least impact upon agriculture, dairies and the environment in the Imperial Valley. IID opposes SDGE's preferred route and the Northern Route. The Northern Routes are longer, more expensive and unnecessarily impact Imperial Valley agricultural lands, dairies and IID Water Department facilities. The Northern Routes also have far more significant, unmitigable impacts than the Southern Route.

The Draft EIR/EIS found SDGE's preferred route to have 50 significant, unmitigable impacts and was the longest transmission route studied.² By contrast, the Southern Route only had 32 significant, unmitigable impacts and was substantially shorter than the Northern Routes.

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The Southern Route also avoids Anza-Borrego Desert State Park (ABDSP). The Southern Route was also identified as having a lower fire risk than the Northern Routes.³

A0010-9 cont.

IID's primary objection to a Northern Route is that it adversely impacts agricultural lands, dairies and IID Water Department facilities. The Draft EIR/EIS identifies approximately 491.8 acres of Agricultural Resources that would be permanently impacted by the Imperial Valley Link of the Northern Route. These include 270.5 acres of California Department of Conservation (DOC) farmland, 28.4 acres of land under active agricultural operation, and 6.7 acres of Williamson Act lands.⁴ By contrast, the Southern Route would utilize the existing Southwest Powerlink Transmission Line (SWPL) corridor throughout the Imperial County portion of the line. This route would have significantly fewer impacts to agriculture lands and dairies since it parallels the existing SWPL. Existing access roads could be utilized for the new 500 kV SPL line. It is clear that the Southern Route would have significantly fewer impacts on agricultural operations in the Imperial Valley than the Northern Routes. Therefore, IID submits that the Commission should select the Southern Route for the SPL. This route is shorter, less costly, has fewer impacts on Imperial Valley agricultural lands, a lower level of fire risk and avoids ABDSP.

III. LEAPS Transmission-Only Alternative

A0010-10

In assessing the various alternatives presented in the Draft EIR/EIS, the EIR/EIS Team ranked the LEAPS Transmission-Only Alternative (LEAPS Transmission) as the highest ranked transmission alternative. However, the Draft EIR/EIS found that this alternative only met two of the three major project alternatives. The one major project alternative that the Draft EIR/EIS

³ Draft EIR/EIS at ES-3.

⁴ Draft EIR/EIS at D.6-15.

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found not to be met was that LEAPS Transmission did not provide direct access to Imperial Valley renewable resources.⁵

A0010-10 cont.

At the time that the Draft EIR/EIS was prepared, the EIR/EIS team may not have been aware of IID's Coachella Valley-Devers II project. This is a thirty-five mile transmission line that will connect the IID system in the Coachella Valley area to the LADWP and California Independent System Operator (CAISO) balancing authority areas near Palm Springs. It will carry up to 1600 MWs of energy from IID's Coachella Valley substation to the proposed Devers II substation near SCE's existing Devers substation. The CV-Devers II project will be either a double-circuit 230 kV or single-circuit 500 kV line with an anticipated commercial operation date of 2013.

IID's CV-Devers II project will provide a direct path for Imperial Valley renewables into the SCE system. This new line, in conjunction with the LEAPS Transmission project which connects SDGE to SCE, will provide SDGE with direct access to Imperial Valley renewables. Thus, all three major project objectives are satisfied by LEAPS Transmission. IID submits that the EIR/EIS Team should reconsider its conclusion that LEAPS Transmission does not provide direct access to Imperial Valley renewables and make that correction in the final EIR/EIS.

IV. IID System Upgrades

A0010-11

The Draft EIR/EIS includes discussions and analysis about IID's planned system upgrades at pages B-112 through B-114 and in Section D.2. At several locations the Draft EIR/EIS implies that the EIR/EIS Team has analyzed the impacts from IID's projects and established required mitigation, "Mitigation measures to reduce potentially significant impacts of the IID Transmission System Upgrades projects are required in the environmental impact

⁵ Draft EIR/EIS at ES-3.

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analysis below, however implementation of those measures would be executed by IID at the time of project permitting and approval.”⁶

A0010-11 cont.

As explained above, IID is a division of the State of California. As such, IID has or will conduct its own CEQA analysis on any transmission projects that IID decides to build or upgrade. IID is not required, nor will it seek, review of its internal projects from the CPUC. IID is not a co-CEQA lead on the SPL Draft EIR/EIS. IID’s CEQA analysis of its own projects will determine what, if any, mitigation is required for IID projects. IID’s own TEP projects are within the desert landscape, and it has or will fully analyze the impacts under CEQA before moving forward with the projects.

V. Draft EIR/EIS Clarifications

To ensure the record is accurate, the final EIR/EIS analysis should reflect the following:

A. IID is no longer a partner with SDGE on any of the portions of the SPL and consequently IID is not required to conduct CEQA on any portion of the SPL.

A0010-12

B. LADWP is the CEQA Lead on the Greenpath North. LADWP will be responsible for determining the necessary mitigation for that project.

A0010-13

C. Section B-11B is incorrect. Since IID is no longer part of the SPL project, it is not currently planning on constructing the new San Felipe Substation as part of the IID system upgrades.

A0010-14

D. IID does not agree that its transmission system upgrades are part of the SPL for CEQA purposes. They should not be included as connected actions. IID decisions to undertake transmission system upgrades will be based on IID system reliability needs and/or the timing of interconnection requests from generators. They are not in any way dependant on the SPL being

A0010-15

⁶ Draft EIR/EIS at D.2-210

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built. IID agrees that the projects should be included in the cumulative analysis for impacts in the geographic area.

A0010-15 cont.

VI. Feasibility of Routes

The Draft EIR/EIS discusses the feasibility of the different alternative routes for the SPL. SDGE has suggested that the Aspen proposed Southern Route is infeasible to build because of the right-of-way issues with several American Indian Tribes (Tribes). IID has several transmission lines that run through other areas of Tribal land and believes SDGE can work with the Tribes in question to reach an accord. The SWPL set a precedent of cooperation in the Imperial County to build a project that can help residents in both San Diego and Imperial Counties with the cooperation and assistance of the Tribes in both counties. If ultimately it is not possible to reach an accord with the Tribes, the Draft EIR/EIS identifies the BCD alternative as one of the alternatives along the Southern Route that does not require crossing Tribal lands, thereby making the Southern Route feasible.

A0010-16

With respect to the Northern Routes, IID submits that SDGE faces even greater obstacles. SDGE contends that the proposed Northern Routes are feasible because it could use an existing right-of-way (RoW) through Anza-Borrego Desert State Park (ABDSP). This is not correct. A brief history of the existing 92 kV line that runs through ABDSP is helpful in understanding the issue. The existing 92 kV transmission line, known as the "RINCON" line occupies both private and public RoWs that were originally acquired by purchase or prescriptive rights by the original builder and user of the RINCON line. The utility that originally constructed and owned the RINCON line was Southern Sierras Pacific Power Company (Southern Sierras). Southern Sierras obtained the original RoW through what is now ABDSP from the federal government. On October 12, 1943, the license for the RINCON line was transferred to IID by Order of the

A0010-17

Comment Set A0010, cont. Imperial Irrigation District

Federal Power Commission.⁷ IID therefore became the successor in interest to Southern Sierra with respect to that RoW. At some time prior to 1957, IID sold to SDGE the portion of the RINCON line west of the Narrows Substation. At all times since acquiring the line, IID has owned, operated and maintained the portion of the RINCON line from the Narrows Substation east through ABDSP to IID's San Felipe Substation. IID and SDGE both have competing requests to the BLM for the renewal of the existing federal RoW through the ABDSP. Additionally, private RoWs for the RINCON line were assumed by IID. IID has not been asked nor has it agreed to the relocation of any of its transmission lines to allow the SPL to utilize IID's RoW. Therefore, the level of uncertainty about SDGE's ability to obtain a RoW through ABDSP is even greater than any of the uncertainties about obtaining a RoW along the Southern Route. The Draft EIR/EIS recognizes the uncertainty surrounding the RoW through the ABDSP:

A0010-17 cont.

The statutory or recorded easement through the majority of ABDSP is 100 feet, but may be narrower or even non-existent in several areas ... The width and continuity of the existing easement through the Park is contested and under discussion between SDG&E and State Parks.⁷

Therefore, the Northern Routes face significant uncertainty regarding the RoW through ABDSP. For that reason, IID submits that the Southern Route is more feasible than either of the Northern Routes.

VII. Comparison of Environmental Effects from the Northern and Southern Routes through the Imperial Valley.

A0010-18

The Draft EIR/EIS did a thorough job of listing the impacts of each of the alternative routes, but there was not a specific comparison species by species for the alternatives. Following is IID's comparison table that sets forth the actual acreage comparisons between the proposed Northern and Southern Routes within Imperial County. IID recommends that it would be helpful

⁷ Draft EIR/EIS at B-9.

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for entities that need to review and possibly adopt the CEQA or NEPA analysis as their own, to have similar tables for each alternative. Based on IID's preliminary review it appears that the Southern Route has significantly less effect on resources in the Imperial Valley than the Northern Route.

A0010-18 cont.

Impacts to Desert Scrub & Dune Habitat

Proposed (Northern) Route ⁸	Southern Route ⁹
156.69 Acres of permanent impacts	74.32 Acres of permanent impacts
600.84 Acres of temporary impacts	155.57 Acres of temporary impacts
903.74 Acres of offsite mitigation	304.21 Acres of offsite mitigation

Impacts to Flat-tailed Horned Lizards

Proposed (Northern) Route ¹⁰	Southern Route ¹¹
232.7 Acres of impact in Mgmt Area	8.1 Acres of impact in Mgmt Area
299.2 Acres of impact outside of Mgmt Area	101.1 Acres of impact outside of Mgmt Area
1,673 Acres of land acquisition mitigation	368.65 Acres of land acquisition mitigation

Impacts to Peninsular Bighorn Sheep

Proposed (Northern) Route ¹²	Southern Route ¹³
87.7 Acres of impact to sheep critical habitat	64.5 Acres of impact to sheep critical habitat

⁸ Draft EIR/EIS at D.2-86.
⁹ Draft EIR/EIS at E.1.2-15.
¹⁰ Draft EIR/EIS at D.2-111.
¹¹ Draft EIR/EIS at E.1.2-24.
¹² Draft EIR/EIS at D.2-114.
¹³ Draft EIR/EIS at E.1.2-25.

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Impacts to Burrowing Owls

Proposed (Northern) Route ¹⁴	Southern Route ¹⁵
High potential for impacts due to 325.13 Acres of agricultural (owl habitat) land impact	Minor potential for impacts due to only 41.74 Acres of agricultural (owl habitat) land impact

A0010-18 cont.

Impacts to Desert Pupfish

Proposed (Northern) Route ¹⁶	Southern Route
High potential for impacts due to crossing and construction impacts to San Felipe Creek	No impacts – no crossing of pupfish habitat

Impacts to Desert Tortoise

Proposed (Northern) Route	Southern Routes
Low potential for impacts, however more desert tortoise potential habitat crossed in this route	Low potential for impacts, however less desert tortoise potential habitat crossed in this route

Impacts to Cultural Resources (total routes from Imperial Valley Substation to Coastal Link)

Proposed (Northern) Route	Southern Routes
Potential impact to 355 cultural resource sites	Potential impact to 206 cultural resource sites

Thank you for this opportunity to comment on the Draft EIR/EIS.

Sincerely,



Juan C. Sandoval, P.E.
Asst. Manager, IID Energy

¹⁴ Draft EIR/EIS at D.2-116.

¹⁵ Draft EIR/EIS at E.1.2-27.

¹⁶ Draft EIR/EIS at D.2-106; D.2-124; Table D.2-4.

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Imperial Irrigation District



IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P O BOX 937 • IMPERIAL, CALIFORNIA 92251

April 11, 2008

Ms. Billie Blanchard, CPUC / Ms. Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
Fax: (866) 711-3106

A0010-19

Dear Ms. Billie Blanchard and Ms. Lynda Kastoll:

Subject: *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*

The Imperial Irrigation District (IID) Water Department appreciates the opportunity to comment on the January 2008 *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 Number DES-07-58, California Public Utilities Commission & U.S. Department of Interior Bureau of Land Management (Draft EIR/EIS)*.

Both the *Environmentally Superior Northern Route Alternative* and the *Proposed Project Alternative* have significant environmental impacts to Imperial Valley's biological, visual, wilderness/recreation, agricultural, cultural/paleontological, noise, public health/safety, air quality, water, and economic resources. Environmental elements negatively impacted include farmlands, agricultural operations, cultivated fields, existing dairies, fledgling dairy industry, residents, and nearby property owners.

The aerial base map used by San Diego Gas and Electric (SDG&E) is from the early 1990s and does not show existing Imperial Valley structures such as dairies, agricultural businesses, Centinela State Prison, and more recent developments including newer residential structures along the routes of the proposed 500 kV transmission line (Line). This project's base map should be updated and visually enhanced using current aerial base maps. The *Proposed Project Alternative* and *Environmentally Superior Northern Route Alternative* passing through Imperial Valley should be re-evaluated using updated and more accurate aerial base maps.

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Billie Blanchard/Lynda Kastoll

April 11, 2008

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In Section H Comparison of Alternatives, of the Draft EIR/EIS, your conclusions regarding the *West Main Canal-Huff Road Modification Alternative* impacts are not correct. The *West Main Canal-Huff Road Modification Alternative* continues to pass through Bullfrog Farm dairy facilities and the proposed raceway development project. Also, active agricultural operations have increased in this area, and several residences are located underneath and adjacent to the proposed Line. The use of current aerial base maps in the alternatives analysis would clarify these features and provide for more accurate conclusions and decision-making.

A0010-20

While SDG&E maintains that less than 10 acres of agricultural lands are affected, negative impacts to agriculture are likely more extensive than simply calculating the area encompassed by a 200-foot wide right-of-way road through agricultural lands. Agricultural lands have associated infrastructure improvements that may be also be impacted including: field grading, water delivery systems, open channels, earth embankments, ponds, water control/measurement facilities, vegetated waterways, drain water removal facilities, drain water return pumping systems, subsurface tile drains, pumps, and various irrigation equipment. Aerial spray applications for adjacent agricultural fields may also be negatively impacted and the safety of aerial applicators and their equipment may be compromised. With additional analysis using updated base maps, it is estimated that up to 500 acres of agricultural lands along these routes may be negatively impacted.

A0010-21

IID Water Department facilities, canals, and drains are located extensively throughout its water service area and include the area along the routes for the *Environmentally Superior Northern Route Alternative* and the *Proposed Project Alternative*. Once more accurate route information is available the IID Water Department should be consulted to quantify impacts to specific IID canals, drains, and other facilities to determine what if any mitigation measures may be required.

A0010-22

In 2006 Imperial County's agricultural businesses had a gross annual production of approximately \$1.4 billion, based in part on \$418.4 million of livestock production and \$298.9 million of field crop values. Agricultural lands served by IID produce field crops that support the local livestock and dairy industries, so any economic impacts to these types of current, planned, or proposed industries concern IID and its water users. These potential economic losses are not adequately accounted for in SDG&E's route planning, but are relevant to the impact analysis.

A0010-23

SDG&E's *Proposed Project Alternative* and the *Environmentally Superior Northern Route Alternative* in the Draft EIR/EIS both are routed through existing Imperial Valley dairy properties. The proposed route along the, *West Main Canal-Huff Road Modification Alternative* segment goes through Bullfrog Farm's calf operational facilities, which may have detrimental impacts to this dairy. Published studies have indicated that stress factors, including electrical conductivity, may reduce milk production in cattle and impact the health of animals. Dairy cows and younger dairy calves stay in the same area for years and may experience longer term or cumulative impacts as a result of the electrical fields associated with the project should this segment be constructed. The proposed 500kV transmission line should be located far enough away from agricultural lands to negate or minimize any potential negative effects to both agriculture and economically important industries within IID's water service area.

A0010-24

Two additional Bullfrog Farm dairies have been proposed for construction on the east side of Huff Road. The proposed 500kV transmission line segment, going north along Huff Road from the Westside Main Canal, could potentially impact these dairy expansions. Locating a 500 kV

A0010-25

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Billie Blanchard/Lynda Kastoll

April 11, 2008

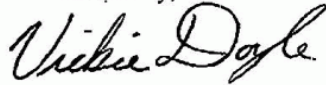
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transmission line in this area may negatively impact existing dairies and new dairy development, which could result in large economic losses to Imperial County.

A0010-25 cont.

Thank you for the opportunity to comment and raise issues of concern regarding potential negative impacts related to the *Environmentally Superior Northern Route Alternative*, the *Proposed Project Alternative*, and the *West Main Canal-Huff Road Modification Alternative* as currently described in the January 2008 *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 Number DES-07-58*. If you have any questions, please contact me at (760) 339-9446.

Sincerely,



Vickie Doyle
Resources Planning & Management

Responses to Comment Set A0010

Imperial Irrigation District

- A0010-1 The commenter's statement that there are potential impacts to IID's water facilities with the FTHL Eastern Alternative and the SDG&E West Main Canal–Huff Road Modification Alternative is acknowledged. Impacts to the water facilities and agricultural lands and mitigation measures associated with these two alternatives are discussed under Impact S-2 (Construction would disrupt the existing utility systems or cause a collocation accident) in Section D.14 and in Section D.6 (Agricultural Resources) of the Draft EIR/EIS. The Applicant Proposed Measure (APMs) and additional mitigation measures proposed in the EIR/EIS address potential impacts to agricultural resources and operation in the Imperial Valley area.
- Table A-1 (Permits or Other Actions Required Prior to Construction of the SRPL) in Section A.6.5 of the Draft EIR/EIS notes that the IID will have permitting authority for crossings of IID irrigation/drainage channels, which would require an encroachment/crossing permit.
- A0010-2 The text under the Environmental Setting for the FTHL Eastern Alternative in Section D.14.14.1 has been revised to include additional canals references by the commenter:
- The route would cross the Westside Main Canal between ALT MP 1 and ALT MP 3. The FTHL Alternative would also cross the Forgetmenot Canal, Foxglove Canal, Forgetmenot Drain, and Dixie Drain No. 4.
- A0010-3 The text under the Environmental Setting for the SDG&E West Main Canal–Huff Road Modification Alternative in Section D.14.14.3 has been revised to include reference to the Fillaree Drain, as requested by the commenter:
- The route would also parallel the Westside Main Canal, ~~and~~ the Fillaree Canal and the Fillaree Drain.
- A0010-4 Impacts to the water facilities/canals and agricultural lands, as well as associated mitigation measures are discussed under Impact S-2 (Construction would disrupt the existing utility systems or cause a collocation accident) in Section D.14 and in Section D.6 (Agricultural Resources) of the Draft EIR/EIS.
- A0010-5 This comment states SDG&E must obtain a copy of the IID Water Department Developer Project Guide 2007 and comply with the District's permitting requirements. Table A-1 (Permits or Other Actions Required Prior to Construction of the SRPL) in Section A.6.5 of the Draft EIR/EIS notes that the IID will have permitting authority for crossings of IID irrigation/drainage channels, which would require an encroachment/crossing permit.
- A0010-6 It is not anticipated that new or reconstructed IID facilities would be required with the Proposed Project or alternatives; however, exact locations of the towers and spur/access roads would be determined during final engineering after negotiations with agricultural landowners. With implementation of Mitigation Measure AG-1a (Avoid interference with agricultural operations), SDG&E would be required to coordinate with property owners and tenants to ensure that project construction would avoid or

minimize interference with agricultural operations. Agricultural operations include, but are not limited to, the use of farm vehicles and equipment, access to property; water delivery, drainage, and irrigation.

- A0010-7 The history and information about the IID is acknowledged.
- A0010-8 The location of existing IID transmission lines are illustrated on Imperial Valley Link figures within the Draft EIR/EIS. The location of existing IID transmission lines are also noted in the Public Services and Utilities section under the Environmental Setting within Section D.14 of the Draft EIR/EIS. IID Transmission System Upgrades, including a new 230 kV line into a new San Felipe Substation, are considered to be a “connected action” to the Proposed Project and are described in Section B.6.1.2 in Volume 1 of the Draft EIR/EIS. The commenter’s opposition to the SRPL Project being constructed adjacent to IID’s transmission facilities is acknowledged.
- A0010-9 The impacts of the Northern Route and the commenter’s support for the Environmentally Superior Southern (SWPL) Route are acknowledged.
- A0010-10 Please refer to General Response GR-4 for a discussion of project objectives and feasibility related to the LEAPS Transmission Line Only Alternative.
- A0010-11 The commenter’s confirmation that IID would conduct its own CEQA analysis and determine what, if any, mitigation would be required on any transmission projects that IID decides to build or upgrade is acknowledged.
- A0010-12 The commenter’s statement that IID is no longer a partner with SDG&E on any portion of the Sunrise Powerlink Project is acknowledged.
- A0010-13 The commenter’s statement that LADWP is the CEQA Lead Agency for Greenpath North is acknowledged. Section A.5.3 in the Draft EIR/EIS describes the Green Path Coordinated Projects. In addition, the Green Path Coordinated Projects Alternative is described in Section 4.9.27 of Appendix 1 of the Draft EIR/EIS, including both the LADWP and the IID/Citizens components of the projects.
- A0010-14 The commenter has stated that because IID is no longer a part of the Proposed Project, it is not currently planning on constructing the San Felipe Substation as part of the IID System Upgrades. Therefore, due to the change in circumstances, the IID System Upgrades are no longer considered to be connected actions. The definition of connected actions and a description of why the IID transmission system upgrades are considered a connected action have been deleted from Section B.6 of Volume 1 of the Draft EIR/EIS. In addition, the analysis for each issue area within Section D of the Draft EIR/EIS has also been removed. The commenter’s agreement that the IID transmission system upgrades should be considered in the cumulative scenario is noted and accordingly analyzed in Section G in Volume 5 of the Draft EIR/EIS.
- A0010-15 The commenter states that the IID transmission system upgrades should not be considered a connected action because IID is no longer a partner with SDG&E on any portion of the Proposed Project; instead, the IID transmission system upgrades should be considered under cumulative impact analysis. Please refer to Response A0010-14.

- A0010-16 As described in Section H, the Environmentally Superior Southern Route in this Final EIR/EIS would incorporate the BCD Alternative Revision and the BCD South Revised Option Revision, which are discussed in Section 3.3.2 of the Recirculated Draft EIR/Supplemental Draft EIS. It would not cross Tribal Land.
- A0010-17 Section B.2.2 in Volume 1 of the Draft EIR/EIS discusses the history and uncertainty of the existing ROW through ABDSP. The commenter states that it has not agreed to the relocation of IID's 92 kV line with ABDSP. The commenter's opinion the northern route through ABDSP would create greater feasibility concerns associated with the uncertainty surrounding the ROW with ABDSP than a southern route has been noted.
- A0010-18 Please refer to Appendix 8O in which the acreage of biological resources impacts are compared between the Northern and Southern Environmentally Superior route, as well as for the Proposed Project and SDG&E's "Enhanced" Northern Route. As is concluded in Section H.5.3 in the Draft EIR/EIS, the Southern (SWPL) Environmentally Superior Alternative was found to be environmentally superior to the Northern Environmentally Superior Alternative and the Proposed Project.
- A0010-19 The base maps used in the figures in the Draft EIR/EIS for the Imperial Valley were updated in 2006 from those submitted by SDG&E in its Application and Proponent's Environmental Assessment. Appendix 11 in the Draft EIR/EIS provides detailed figures of the Proposed Project and alternatives.
- A0010-20 The IID questions the conclusions regarding the West Main Canal-Huff Road Modification Alternative's impacts. The commenter notes that the alternative passes through Bullfrog Farm dairy facilities and a proposed raceway development, and that several residences are located underneath and adjacent to the proposed line.
- The alternative passes approximately 2,000 feet east of current Bullfrog Farm dairy operations. The subject of impacts to dairy operations is discussed in Section 6.5, under Impact AG-3. There are no residences shown on the aerial photography from 2002, nor the updated photography (see Response to Comment A0010-19). However, if residences now occupy formerly agricultural land through which the alignment would pass, SDG&E would likely develop route revisions to shift the transmission line so it is not located in proximity to residences. The existing Imperial Valley Speedway, located on the Imperial fairgrounds, is not in the vicinity of the alternative. If a new speedway is proposed in the vicinity of the project, a work-around may need to be designed, to the extent that the layout of the two is incompatible.
- A0010-21 The commenter estimates that as much as 500 acres of agricultural land could be negatively impacted by the project, and enumerates agricultural infrastructure that could be impacted, as well as aerial applicators.
- The impacts pointed out in the comment are discussed in the impact discussion in Section D.6, Agriculture. Where necessary, mitigation measures are presented to reduce impacts to a less than significant level. An exception is with regard to aerial applicators; for which there is a significant unmitigable impact. This is discussed in Section D.6.5, under Impact AG-3. It is not clear how the estimate of 500 acres of impact was derived. Nevertheless, the impact of the project on agricultural land is considered significant, based on a 10-acre level of significance.

- A0010-22 Table A-1 (Permits or Other Actions Required Prior to Construction of the SRPL) in Section A.6.5 of the Draft EIR/EIS notes that the IID will have permitting authority for crossings of IID irrigation/drainage channels, which would require an encroachment/crossing permit. IID Water Department would be consulted as a part of this process.
- A0010-23 A discussion of the impacts of the project on agricultural revenues in the Imperial Valley is discussed under Impact S-1 (Project construction and/or transmission line presence would cause a change in revenue for businesses, tribes, or governments) in Section D.14.5 of the Draft EIR/EIS. Economic losses are also specifically addressed in APM LU-3, which states that farmers (or other relevant parties) will be compensated for project-related losses of crops or other pertinent agricultural resources based upon a professional appraisal. In addition, as discussed in Section D.6 of the Draft EIR/EIS, Mitigation Measure AG-1a would require that SDG&E coordinate with property owners and tenants to ensure that project construction would be conducted so as to avoid interference with agricultural operations and existing equipment and irrigation systems.
- A0010-24 The commenter states that the Proposed Project and alternatives that pass over or near dairy properties may have detrimental impacts, in particular Bullfrog Farm. This topic was raised by the Imperial County Farm Bureau as well. Please see Responses B0035-2, B0035-3, and B0035-4.
- A0010-25 The commenter states that the presence of a 500 kV transmission line would negatively impact existing and proposed dairies. Please see Response A0010-24.