

IMPERIAL IRRIGATION DISTRICT

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

October 19, 2006

Billie Blanchard, CPUC / Lynda Kastoll, BLM
% Aspen Environmental Group
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San Francisco, CA 94104-3002
Fax: (866) 711-3106

Dear Ms. Billie Blanchard:

Subject: *SDG&E Sunrise Powerlink Project Notice of Preparation/Notice of Public Scoping Meetings for an Environmental Impact Report/Environmental Impact Statement*

The Imperial Irrigation District (IID) Water Department appreciates the opportunity to comment on the *SDG&E Sunrise Powerlink Project Notice of Preparation/Notice of Public Scoping Meetings for an Environmental Impact Report/Environmental Impact Statement* (NOP). San Diego Gas & Electric Company (SDG&E) has filed applications (A.05-12-041 and A.06-08-010) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the proposed Sunrise Powerlink Project.

The Sunrise Powerlink Project includes construction of a new 500kV electrical transmission line (Proposed 500kV Line) in Imperial County. The route for the Proposed 500kV Line begins at Imperial Valley Substation (south of Interstate 8), goes northwest adjacent to the Southwest Powerlink transmission line (an existing 500 kV transmission line), turns north, passes through the entire western edge of Imperial County agricultural lands until it reaches the intersection of Highways 86 and 78 (west of the Salton Sea), turns west, and goes into San Diego County. In Imperial County the Proposed 500kV Line will have 205 new 500kV towers with an average height of 160 feet and will require a 200-foot right-of-way. This results in approximately 50 miles of new access roads and approximately 120 acres of disturbed lands in Imperial County.

The aerial base used for the Proposed 500kV Line is from 1994 and does not illustrate current site conditions such as dairies, agricultural businesses, Centinela State Prison, and newer residential structures along the route. This makes it appear that the route for the Proposed 500kV Line goes through vacant lands when that is not the case. SDG&E should update the Proposed 500kV Line's base map using more recent aerial maps available to the public.

In 2005 Imperial County's agricultural businesses had a gross annual production of approximately \$1.3 billion, based in part on \$362.2 million of livestock production and \$269 million of field crop values. Agricultural lands served by IID produce the 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 certainly relevant to your impact analysis.

Using more recent aerial photography as a base you can clearly see that the proposed route for the Proposed 500kV Line goes through the main milking building of the Bullfrog Farms dairy. Studies have shown that stress factors, including electrical conductivity, can reduce milk production in cattle and impact the health of animals. Given that, IID is also aware of plans by at least two, and possibly six, additional dairies planning to locate on the western edge of IID's service area. Two of these dairies are currently involved in the permitting process and proposed at sites adjacent to the existing Bullfrog Farms dairy. With construction costs exceeding \$60 million for these two proposed dairies alone, the Proposed 500kV Line should be located far enough away from agricultural lands to minimize potential effects on both agriculture and economically important industries within IID's water service area.

Imperial County is an area that is known internationally for its biodiversity and habitat that supports over 400 bird species. Agricultural lands within the IID and the Salton Sea serve as a critical link within the 5,000 mile international Pacific Flyway for bird migration. Damage to Imperial County biodiversity resulting from the Proposed 500kV Line being placed through agricultural lands could potentially impact bird migration or other agricultural species and should be assessed fully.


In Imperial County the area surrounding the Proposed 500kV Line is part of the Lower Colorado River Delta system and prehistoric lakes have existed in this area as the course of the Colorado River has shifted. Several hundred years ago Lake Cahuilla formed periodically in this area and provided support for tribal dwellers in Imperial County. Given this historical perspective, the Proposed 500kV Line could potentially damage numerous cultural sites in Imperial County during construction so this should also be assessed.

Potentially there are several IID Water Department facilities, canals, and drains located along the Proposed 500kV Line. Determination of exactly which facilities, canal, and drains are impacted is difficult due to the maps provided by SDG&E. SDG&E should consult with Water Department staff regarding impacts to facilities, canals, and drains.

The IID requires Encroachment Permits to install drain or canal facilities. The IID's Real Estate Section handles Encroachment Permits and may be contacted at (760)339-9239 for information pertaining to encroachment permits.

Once again, thank you for the opportunity to review the *SDG&E Sunrise Powerlink Project Notice of Preparation/Notice of Public Scoping Meetings for an Environmental Impact Report/Environmental Impact Statement (NOP)*. If you have any questions regarding these comments, please contact me at (760) 339-9446.

Sincerely,

A handwritten signature in cursive script that reads "Vickie Doyle".

Vickie Doyle
Resources Planning & Management