

Comment Set F0001  
Imperial County Planning & Development Services



IMPERIAL COUNTY

**PLANNING & DEVELOPMENT SERVICES**

PLANNING / BUILDING INSPECTION / ECONOMIC DEVELOPMENT / PLANNING COMMISSION / A.L.U.C.

**JURG HEUBERGER AICP, CEP, CBO**  
PLANNING & DEVELOPMENT SERVICES DIRECTOR

**CERTIFIED MAIL# 7007-1490-0003-4072-8532**

August 11, 2008

Billie Blanchard, CPUC & Linda Kastoll, BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Ste. 935  
San Francisco, CA 94104-3002

**SUBJECT: Response to Recirculated Draft EIS/Supplemental Draft EIR  
SDG&E Sunrise Powerlink Project/SCH #2006091071**

Dear Ms. Blanchard & Ms. Kastoll:

The Planning & Development Services Department received on July 11, 2008, a copy of the "Notice of Availability, Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the proposed Sunrise Powerlink Project" for review and comment by **August 25, 2008**.

The proposal is for a recirculation and review of "...In December 2007, Sempra Generation (Sempra) submitted to the U.S. Department of Energy an Application for Presidential Permit, defining a 1,250 MW wind project in Mexico, transmission lines into the U.S., and a new substation located northeast of the town of Jacumba...As a result, the RDEIR/SDEIS presents a new analysis of the Sempra project..." Also, the "Notice" identifies 13 reroutes within the new and revised analysis of the recirculated document and two of the SDG&E's SRPL reroutes are within the County of Imperial.

After a review of the "Notice of Availability", the County continues to have significant concerns on the SDG&E Sunrise Powerlink Project relating to various environmental impacts as discussed below.

As you have been previously informed, the Imperial County Board of Supervisors outlined its position on the existing electric power plants in Mexico and the potential for the construction of additional industrial and related power plants in Mexico that would incrementally have an adverse environmental impact from increased air pollutants on residents within the Mexicali and Imperial Valley areas.

Imperial County in its capacity as a "responsible agency" under CEQA will be reviewing the recirculated Final Draft EIR/Supplemental EIS regarding the potential impacts on the region's air quality, military target range impacts, crop dusting activities, dairy farm impacts, Imperial County road impacts, and public safety issues, to name a few.

F0001-1

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Recirculated DEIR/SDEIS  
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The following are comments on the submitted "Notice of Availability" from the DOI Control No. DES-07-58 environmental document:

- 1) **Air Quality:** SDG&E is proposing to permit and construct up to 1,250 MW's of wind-turbine generated electricity to be transported by transmission lines into the United States as well as the construction of the potential "Jacumba Substation" and "Boulevard Substation (expanded)". The two areas where reroutes are proposed in Imperial County, would affect new landowners, local County roads, and potentially generate increased air emissions during construction, operation and/or maintenance of these rerouted transmission lines. As has been stated in previous correspondence, Imperial County is non-attainment "Serious" for both PM10 and Ozone with the City of Calexico designated as "Moderate" non-attainment for PM2.5. F0001-2
  
- 2) **Military Target Ranges:** The rerouted transmission lines will need to identify if there will be more than the proposed 205 new 500-kV towers with an average height of "160 feet". The rerouted SRPL would require some additional new 200-foot rights-of-way and access roads. The revised and recirculated SRPL project would need to be reviewed again by the Imperial County Airport Land Use Commission, United States Navy, and the Naval Air Station El Centro, as it relates to the future potential impacts on low-level military training routes and target ranges that the military has in the area as well as potential impacts on local crop dusting operations. F0001-3
  
- 3) **Dairy Farm Impacts:** The rerouted area of the "N6 Private Land Revision" could impact the existing Bullfrog Farm Dairy and other potential future dairy farms in the vicinity. The recirculated DEIR/SDEIS needs an expert technical analysis on the potential health risks and milk production of the existing and future dairy's livestock. The proposed rerouted transmission line could cause economic damage including a negative "ripple effect" on local dairies, e.g. the proposed eastern route of SRPL was opposed by the Farm Bureau as "**very detrimental**" to the development of the dairy industry. F0001-4  
  
F0001-5
  
- Impacts to Local County Roads:** Previous comments by the Imperial County Public Works Department states that "...Construction could result in a temporary disruption of traffic flow, disruption of transit services, or disruption of rail services..." Any rerouting of the transmission lines, the 200-foot rights-of-way and access roads will impact both private lands as well as local County roads within the rerouted transmission corridor. Within the irrigated area, single poles are less intrusive than the larger footprint of lattice-type towers and should be considered in the DEIR/SDEIS environmental document. F0001-6  
  
F0001-7
  
- The recirculated environmental document should also address how direct and indirect impacts to private land owners and adjacent Imperial County roads will be mitigated, offset, or avoided by SDG&E. F0001-8

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- 4) **Public Safety:** The recirculated Draft EIR/Supplemental EIS should explain in detail what future emergency response procedures/actions that shall be taken by U.S. and Mexican authorities when there is a major earthquake or terrorist event that disrupts and/or cuts off the electrical power being transmitted from the new proposed 230-kV transmission lines and any new 500-kV transmission line to be located within Imperial and San Diego Counties. F0001-9

**Summary:**

Imperial County's foremost concern is that the construction of the Sunrise Powerlink Project would facilitate the export of electricity from northern Baja California (whether it is wind and/or solar) that could significantly exacerbate air pollution throughout the entire Imperial-Mexicali Valley basin. F0001-10

Also as we have stated previously, for new proposed "***N6 Private Land Revision***" east of the military Desert Range and north of the Naval Air Facility, and the "***BLM Gifted Lands Reroute***" south of State Route 78, the state/federal environmental document should consider mitigation measures avoiding impacts to Imperial County's growing dairy industry as well as identify the potential earthquake impacts at these points and the event of a catastrophic event, identify the emergency actions to be taken by all affected agencies. F0001-11  
F0001-12

We look forward to reviewing the Final Draft EIR/EIS for the Recirculated Draft EIR/Supplemental Draft EIS for the proposed Sunrise Power Link project. The County reserves the right to respond to insure appropriate mitigation has been included prior to any federal and state approvals of the SRPL transmission line. F0001-13

If you have any questions on the above, please contact me at (760) 482-4236, extension 4310, or at [jurgheuberger@imperialcounty.net](mailto:jurgheuberger@imperialcounty.net).

Sincerely,

  
JURG HEUBERGER, AICP, CEP  
Planning & Development Services  
Department Director

cc: Ralph Cordova, County Executive Officer  
Michael Rood, County Counsel  
Joanne L. Yeager, Asst. County Counsel  
Darrell Gardner, Asst. Planning & Dev. Services Director  
Brad Poiniez, Air Pollution Control District Officer  
Steve Birdsall, Agriculture Commissioner  
Vicki L. Wood, Manager, BLM/EI Centro Field Office  
SDG&E Sunrise Powerlink Correspondence File  
File 10.100, 10.105, 10.124, 10.130, 10.133, 10.134, 10.142, 90.100

MS:/H/DG/JM/RG/S./PlanningClerical/ResponseToRecirculatedDEIR-DEISSunrisePowerlink Finalized MS

## Responses to Comment Set F0001 Imperial County Planning & Development Services

F0001-1 Please refer to General Response GR-7 regarding Mexican power generation and Responses F0001-2 through F0001-13 for responses to the commenter's individual concerns.

F0001-2 The impacts of dust and other emissions during construction of facilities (Impact AQ-1) are disclosed in Section 2.11.2 of the RDEIR/SDEIS, and mitigation measures are identified to address the impact. The attainment status of the area is noted in Section D.11.3.2 of the Draft EIR/EIS.

F0001-3 The commenter states that the analysis of the rerouted transmission line routes needs to consider additional towers and new ROW and access roads. The analysis of the transmission line reroutes in the RDEIR/SDEIS considered the location of proposed tower structures. The proposed tower locations are identified on the figures in Section 3 (Revisions to Proposed and Alternative Transmission Line Routes) in the RDEIR/SDEIS. The analysis also considered the impacts from any new ROW and access roads.

The commenter also states that the document should be recirculated for review by the U.S. Navy, Naval Air Station El Centro and Imperial County Airport Land Use Commission. Notices regarding the RDEIR/RDEIS were provided to the U.S. Navy, including four CDs with an electronic version of the document and Notices of Availability (NOA) were sent to four different U.S. Navy representatives and two additional NOAs were sent to two different Navy representatives at the El Centro Naval Aux Air Station. Navy representatives received six notices regarding the recirculated draft document. A hard copy of the RDEIR/RDEIS along with a separate NOA was sent to the Director of the Imperial County Planning and Development Department, who serves as the contact for the Airport Land Use Commission (ALUC) according to a website list of ALUC contacts. ([http://www.dot.ca.gov/hq/planning/aeronaut/documents2/ALUC\\_Contact\\_List\\_8-20-08.pdf](http://www.dot.ca.gov/hq/planning/aeronaut/documents2/ALUC_Contact_List_8-20-08.pdf)) With regard to review by the County ALUC, SDG&E is not required to obtain discretionary permits or review from local agencies because the CPUC has preemptive jurisdiction over utility projects. However, SDG&E will coordinate with local and regional agencies for ministerial permits such as building, grading, and air permits.

The U.S. Navy submitted written comments of their concerns with the Sunrise Powerlink Project (see Responses to Comment Set A0017). The military contact office included on the Navy comment letter will receive a Notice of Availability for the Final EIR/EIS.

In addition, the RDEIR/SDEIS was circulated for public and agency review for a 45-day public review period from July 11 to August 25, 2008. The CPUC and BLM circulated the Notice of Availability to government agencies, interested organizations, community groups, and property owners. The document was also available at 27 repository sites and on the project website.

F0001-4 The N6 Private Land Revision would be a minor revision of the Proposed Project in the Imperial Valley Link, which would minimize land use impacts by moving the route to BLM land instead of bisecting a privately owned parcel. Bullfrog Farm is located sev-

eral miles southwest of the reroute. This reroute would also avoid cultural resources and no new impacts would be created. Therefore, the N6 Private Land Revision has been incorporated into the Proposed Project as a mitigation reroute, as well as into SDG&E's "Enhanced" Northern Route and the Final Environmentally Superior Northern Route. Please see Response to Comment E0004-140 for more information on this reroute. Please see Responses to Comments D0152-1 through D0152-6 and D0198-1 through D0198-11 for more information on the transmission line route and dairy farms.

F0001-5 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 discusses revenue impacts to agricultural operations in the Imperial Valley Link. As described in Section B.2.1 and Section D.4.5 of the Final EIR/EIS, the N6 Private Land Revision would move the proposed route to BLM land instead of bisecting a privately owned parcel. The revision around MP 20 would not increase any economic impacts to Bullfrog Farm, which is located several miles southwest of the reroute.

F0001-6 Comments regarding the potential for the project to result in temporary disruption of traffic flow, transit services, and rail services are acknowledged. The Draft EIR/EIS evaluates the project's impact on local roads and other transportation services. Mitigation Measure T-9a (Prepare Construction Transportation Management Plan) requires that SDG&E coordinate with local agencies and identify transportation and traffic issues during construction including the need and location of lane and road closures, traffic routes, parking and other traffic-related issues.

F0001-7 The commenter states that single poles are less intrusive than lattice-type towers and should be evaluated in the RDEIR/SDEIS. The Draft EIR/EIS includes consideration of the type of towers that will be used in the project. Section 3.1 (Structures) in the project Description states that the Imperial Valley Link includes the use of 47 steel poles between MP 4 and 20 along the western edge of agricultural land. Exact locations of the towers 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.

F0001-8 The commenter states that the recirculated document should address how impacts to private landowners and County roads will be mitigated, offset, or avoided by SDG&E. As noted in the RDEIR/SDEIS, the recirculated document presented new information that was not evaluated in the Draft EIR/EIS. Only those portions of the Draft EIR/EIS that were modified based on new information were discussed in the RDEIR/SDEIS; the RDEIR/SDEIS supplements information presented in the original Draft document. The Draft EIR/EIS includes the assessment of direct and indirect impacts to private landowners and adjacent County roads. Section B of the Draft EIR/EIS identifies the Applicant Proposed Measures (APM) that would be implemented by SDG&E to reduce impacts. Each issue area discussion, such as Traffic, considered the APMs in the impact analysis and if necessary additional measures were identified in the Draft EIR/EIS and the RDEIR/SDEIS to further reduce impacts. Refer to Section E of the

Draft EIR/EIS for more information on impacts from the Proposed Project and Project alternatives and applicable mitigation measures.

F0001-9 Impact PS-5 in Section D.10.20 in Volume 3 of the Draft EIR/EIS analyzes impacts that the transmission (230 kV or 500 kV) or substation facilities could suffer an outage. If the Sunrise Powerlink transmission line or a substation along the transmission line were damaged (e.g., from terrorism or a major wildfire) and this resulted in a power outage, SDG&E would reroute electricity using other components of the regional transmission system. This was demonstrated in the October 2007 wildfires, when the 500 kV Southwest Powerlink was out of service for several days due to the proximity of the Harris Fire. Even though this transmission line generally imports the majority of San Diego's power, SDG&E was able to maintain service (to areas not directly burned) by rerouting electricity to lines that connect its system to the Southern California Edison system. The regional transmission system is interconnected in such a way that it is not possible to say that a single line outage would cause an outage at a specific hospital, airport, security facility, etc. In addition, although most facilities of this type may receive power from the SDG&E transmission system supplied by the proposed Sunrise line, major facilities would also have back-up power/generators to prevent electricity interruptions in the event of an outage. Therefore, this impact is considered to be adverse, but less than significant.

Section D.13 in Volume 3 of the Draft EIR/EIS addresses faults and seismicity within the region of the Proposed Project. Impact G-4 (Project would expose people or structures to potential substantial adverse effects as a result of seismically induced groundshaking and/or ground failure) addresses the risk that the project will expose people or structures to adverse effects because of groundshaking and/or ground failure and concludes it is significant but mitigable along the entire length of the Proposed Project and alternatives with the implementation of mitigation measures that would reduce the effects of groundshaking and conduct testing for and then avoid areas of liquefaction.

Information on future emergency response procedures by Mexican authorities is not available and not required at this time because no actions would be taken to approve Mexican projects using the Sunrise Powerlink EIR/EIS. The Department of Energy's analysis of the Sempra Rumorosa Wind Energy Project may address this issue.

F0001-10 Generating electricity with new wind and solar power plants in Mexico would not result in notable quantities of emissions that would affect Imperial County, as shown in Section 2.11.2 of the Recirculated Draft EIR/Supplemental Draft EIS (Impact AQ-3, Class IV). Please see General Response GR-7 for information on conventional (fossil-fuel) power plants in Mexico near Imperial County.

F0001-11 The Final EIR/EIS includes information on impacts to dairy farms. Please see Response to Comment F0001-4 and Responses to Comments D0152-1 through D0152-6 and D0198-1 through D0198-11 for more information on the transmission line route and dairy farms.

F0001-12 Please see Response to Comment F0001-9 regarding earthquake impacts.

F0001-13 All mitigation measures for the project and alternatives are listed in Appendix 12 of the Draft EIR/EIS. The commenter's comment and contact information is acknowledged.

Comment Set F0002  
Imperial County Air Pollution Control District

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August 19, 2008

Billie Blanchard, CPUC & Linda Kastoll, BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco CA. 94104

RE: Response to Recirculated Draft EIS/Supplemental Draft EIR  
SDG&E Sunrise Powerlink Project/ SCH No. 2006091071

Dear Ms. Blanchard & Ms. Kastoll:

Thank you for the notification of the "Notice of Availability, Recirculated Draft Environmental Impact Report/Supplemental Environmental Impact Statement for the Proposed Sunrise Powerlink Project". The Imperial County Air Pollution Control District (ICAPCD) received the notice on July 11, 2008. According to the notice, the review and comment period is open through August 25, 2008.

The ICAPCD appreciates the opportunity to express our continued concerns related to the construction of a new 500 kV electrical transmission line from the Imperial Valley Substation located in Imperial County to a new substation to be located in San Diego County, and other projects called "connected actions" related to the Sunrise Powerlink Project (SRPL), which this document includes the New and Revised Analysis of the La Rumorosa Wind Project revising the project from a 250MW wind project to a 1,250MW wind project by Sempra.

As pointed out in the ICAPCD Board's comment letter on the Draft EIR/EIS for this project dated March 18, 2008, the ICAPCD Board's primary concern with this proposed project has been the concern that this project would allow further fossil fuel burning facilities to be built in the Mexicali Valley, where air quality standards are less stringent than those in California, and would further degrade the air quality in Imperial County - impacting the health of residents on both sides of the border.

The ICAPCD Board's main focus continues to be protecting the health of the border region residents. The ICAPCD Board will continue to oppose any electrical energy generation project or portion of a project (or "connected action" or an "indirect effect") that does not implement Best Available Control Technology (BACT) and does not offset their emissions or pay in-lieu of fee to be used to offset those emissions that may impact Imperial County and its residents.

F0002-1

F0002-2

Comment Set F0002, cont.  
Imperial County Air Pollution Control District

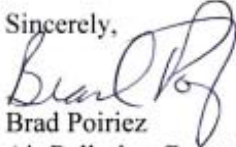
The ICAPCD Board would like to stress their support for renewable energy projects in this region provided that they too meet all the applicable standards as expressed above.

F0002-3

In essence, the concerns expressed by the ICAPCD Board in the previous comment letter dated March 18, 2008 remain the same. The ICAPCD looks forward to reviewing the Final Draft EIR/EIS for the Recirculated Draft EIS for the proposed Sunrise Powerlink Project (SPLP). The ICAPCD reserves the right to respond to insure appropriate mitigation measures have been identified and included prior to any federal and state approvals of the SRPL transmission line.

If you have any questions, please feel free to contact me at (760) 482-4606 or at [bradpoiriez@imperialcounty.net](mailto:bradpoiriez@imperialcounty.net).

Sincerely,



Brad Poiriez  
Air Pollution Control Officer

cc: ICAPCD Board of Directors  
Ralph Cordova, County Executive Officer  
Michael Rood, County Counsel  
Jurg Heuberger, Planning & Dev. Services Director

## Responses to Comment Set F0002 Imperial County Air Pollution Control District

- F0002-1        The commenter notes a concern that the Sunrise Powerlink may allow further fossil fuel burning facilities to be built in Mexico. See General Response GR-7 for information on conventional (fossil fueled) power plants in Mexico near Imperial County.
- F0002-2        The Proposed Project, connected actions, and/or indirect effects would not involve building any electrical generation facilities without the Best Available Control Technology (BACT) or emission offsets required by law.
- Please refer to General Response GR-7 for a discussion of Mexican generation and LNG import and why they are not a connected action or indirect effect of the Proposed Project.
- F0002-3        Please see also Responses to Comment Set A0013.