



IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

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

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October 20, 2006

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235 Montgomery Street, Ste. 935
San Francisco, CA 94104-3002

SUBJECT: Response to NOP for the Proposed SDG&E Sunrise Powerlink Project from Imperial Valley Substation to San Diego County

Dear Reviewing Agencies:

The Planning & Development Services Department received on September 15, 2006, a copy of the "Notice of Preparation (NOP)/Notice of Public Scoping Meetings for an Environmental Impact Report/Environmental Impact Statement (EIR/EIS)" for the proposed San Diego Gas & Electric Company (SDG&E) Sunrise Powerlink Project (SRPL) project. The SDG&E has filed applications for a "Certificate of Public Convenience and Necessity with the California Public Utilities Company (CPUC) with an application for a Right-of-Way Grant with U.S. Bureau of Land Management (BLM).

The proposed project is to be environmentally reviewed and the joint EIR/EIS is to be prepared by the CPUC and the BLM. The NOP identifies the preferred route of the SRPL to be from the Imperial Valley Substation to the Penasquitos Substation in San Diego County. The Imperial Irrigation District (IID) and SDG&E have signed a "Memorandum of Agreement (MOA)" for a plan for ownership and construction of the SRPL. As you are aware, the County Board of Supervisors has, on numerous occasions, explained its position on the existing electric power plants in Mexico and the potential for the construction of additional 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 environmental document and has a number of concerns regarding the potential impacts on the region's air quality, military and crop dusting operations, local County road impacts, public safety issues, and other impacts as outlined below.

The "Scoping Meeting" in Imperial County was held on Monday, October 2, 2006, from 6:00 p.m. to 8:00 p.m. in Room 219, County Administration Center and the comments heard from the public at that meeting are incorporated hereinafter.

According to the Notice of Preparation, the deadline for submitting scoping comments on the proposed "Sunrise Power link Project" is **October 20, 2006.**

1)

Project Description: SDG&E has presented the following eight objectives in its "Proponent's Environmental Assessment (PEA)". One of the objectives stated by SDG&E, subparagraph 4, is to "Reduce the above-market costs...particularly the costs associated with inefficient generators such as the South Bay and Encina Power Plants..." implying that these plants will ultimately be decommissioned, providing an air quality benefit to the coastal-communities as well as the economic benefit of cheaper power. Unfortunately, this stated "objective" by SDG&E does not include air quality mitigation measures for the existing or any future Mexican power plants that have increased air pollution impacts to residents in Mexico and the County of Imperial. The "Summary of Potential Impacts", Attachment 1, Air Quality, page 17, does identify and state that there are "...potential air quality impacts from power plants providing imported power..." (emphasis added)

The proposed mitigation measures for air quality impacts due to this "imported power" from Mexico has been raised by the IID recently, but neither the IID, Sempra or SDG&E has identified in the NOP how it would prevent future air pollution from the development of future Mexican power plants that would utilize the I.V. Substation and the 500-kV Sunrise Powerlink line and importing into the United States the Mexican electrical energy power and air pollutants on residents of both Imperial and Mexicali areas. Transferring air impacts from the coastal plants at South Bay and Encinitas to Mexico and ultimately to Imperial Valley is not acceptable.

The proposed 500-kV Sunrise Powerlink transmission line, 56.5 miles within Imperial County, would be capable of transmitting up to 1,500 MW's of electrical energy once it is constructed and in operation according to Billie Blanchard, CPUC staff. The proposed use of this transmission line is for "renewable" energy sources. The examples given for supporting this new transmission line by CPUC and BLM staff were solar, wind and geothermal energy sources.

Other than a presentation made to the County Board of Supervisors outlining a potential for "solar power" in the County, this "green" technology is not a proven renewable resource in Imperial County. To date, the County has not received any formal application for this "solar" project, other than the verbal presentation made to the Board of Supervisors. This is an un-proven technology that has not been presented to the County. Additionally, it has been established that excessive heat has an adverse affect on solar power generation. Imperial Valley has extreme temperatures in excess of 120°F in the shade, during summer months.

There are a few meteorological towers that are being processed by the BLM/EI Centro Field Office. However, to date, no applications have been made to the County for any "wind power" projects anywhere in the County. This is an un-proven technology that has not been presented to the County.

The need for the new line is based on "**geothermal power**" that is continually referred to by SDG&E and others, as "renewable" and a "green energy source". The Salton Sea area currently has in operation, approximately 350 MW's of base-load geothermal energy.

Recently, CalEnergy obtained the approval for a 215-MW power plant (Salton Sea Unit #6) that has been permitted by the California Energy Commission as well as the County Planning Commission and is ready to be constructed. However, due to the exorbitant increase in material costs and financing difficulties, this geothermal power plant is not going to be built any time soon. Other CalEnergy follow-on geothermal power plants have also been placed on-hold (i.e. Salton Sea Units #7, #8 and #9).

Therefore, the above "renewable" energy resources that are supposed to meet SDG&E's future transmission capability needs in order to meet the "20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020..." are unavailable for transmission or for the SRPL to San Diego any time in the near future.

Thus, the proposed construction of a 500-kV transmission power line by SDG&E to **export** "green" energy that is not available in the short-run, or not likely in very soon, appears to be a ploy to **import up to 1,500 MW's from some other natural-gas fueled source, i.e. Mexico.**

As previously stated, the Draft EIR/EIS should spell out in detail how future air quality mitigation measures and/or offsets are to be proposed by SDG&E, implemented and monitored for any new Mexican power plants and/or additional commercial and industrial projects in Mexico that would use this new electrical power to be generated from natural gas resources both within the City of Mexicali as well as westward of Mexicali.

- 2) **Private Lands:** The proposed SRPL project as identified within the "Imperial Valley Link (Link)", pages 4 and 5, states that the 500-kV transmission line "...The first segment of the project would consist of 60.9 miles of the route, including the entire Imperial County portion and a few miles in San Diego County...Land ownership within the 61-mile Imperial Valley Link is primarily private owners (28.4 miles) and BLM land (31.4 miles). Land uses along the Imperial Valley Link include agriculture (13.5 miles), open space and recreation (46.2 miles) and undeveloped private property..."

The SRPL would have a total of 205 new 500-kV towers with an average height of "160 feet". The Link would require a new 200-foot right-of-way and access roads with "...119.7 acres of disturbance..." The SRPL project would need to be reviewed by the Imperial County Airport Land Use Commission, United States Navy, (Naval Air Station El Centro, March Air force base and NAF Yuma) as it relates to future potential impacts on low-level military

training routes that the military has in the area as well as the impacts on local crop dusting operations.

The scoping meeting held in El Centro identified numerous objections relating to the preferred "eastern route" that potentially would impact the Bullfrog Farm Dairy and other potential future dairy farms in this area. There needs to be expert technical analysis on the potential health risks and milk production of the Dairy's livestock. The NOP fails to propose any such analysis or concern for livestock. The proposed route would cause economic damage including a negative "ripple effect" on local supplies of feed, i.e. hay. A "statistical" statement was made that 10 pounds of production per cow per day are lost due to their proximity to 500-kV transmission power lines. The proposed eastern route of SRPL was opposed by the Farm Bureau as "very detrimental" to the development of the dairy industry.

The environmental document should reflect the additional review by the Imperial County Airport Land Use Commission, military and impacts on the dairy and farming industry in the County.

- 3) **Impacts to Local County Roads:** The comments on the NOP have been provided by the County Public Works Department's letter, dated September 28, 2006. Within the NOP, Attachment 1, "Summary of Potential Impacts", Transportation and Traffic, page 19, it states "...Construction could result in a temporary disruption of traffic flow, disruption of transit services, or disruption of rail services..." The 200-foot right-of-way and access roads will impact both private lands as well as local County roads in the transmission corridor. In the NOP, only a rough transmission corridor has been identified that is very general in nature for the proposed transmission line.

Comments at the scoping meeting indicated that "single poles" are less intrusive than the larger "footprint" of the lattice-type towers and should be considered in the environmental document to be prepared.

The environmental document should also address how these impacts to the private land owners and County roads will be mitigated, offset, or avoided by the SRPL proponents.

- 4) **Public Safety:** The draft EIR/EIS should explain in detail what future Federal, Imperial County and Mexican emergency response procedures/actions that shall be taken when there is a major earthquake event that disrupts and/or cuts off the electrical power being transmitted from the new proposed 230-kV transmission lines and the 500-kV transmission line located within Imperial and San Diego Counties.

- 5) **Biological Impacts:** The new SRPL will potentially cross the BLM federally-designated "Flat-Tailed Horned Lizard Management Study" area, possible critical habitat for the desert tortoise, and private agricultural lands impacting the Burrowing Owl. A comment made at the scoping meeting discussed the addressing of any flora

and fauna "Rare and Endangered Species" that would be impacted by the SRPL line. The draft EIR/EIS prepared for the transmission routes should comprehensively review all of the potential impacts on the above species and their habitats and propose appropriate mitigation measures in the document.

- 6) **Regional Air Quality:** The Imperial County Air Pollution Control District will provide comments under separate cover. With the above potential for unknown incremental increases in the number of Mexican power plants, please identify what federal or state air quality mitigation and off-sets for future long-term health risks are proposed for impacts on the residents of Imperial County and Mexicali areas.

The environmental document for the SRPL must identify in a "worst case scenario" what air impacts would ensue from the total number of power plants and future heavy industrial, commercial and economic development projects that could be constructed in Mexico and address the potential long-term air quality deterioration and possible human health impacts.

The County is not in attainment for PM-10 (particulate matter less than 10 micrometers in diameter) and Ozone (the key pollutant in smog). Ozone (O₃) is not emitted directly from cars, factories, and other sources, but is formed in the presence of sunlight from two "precursor" pollutants that are emitted from these sources, i.e. oxides of nitrogen (NO_x) and reactive organic gases (ROG). On occasion, the state ambient air quality standards are exceeded for ozone in Imperial County.

The SRPL could result in significant PM-10 emissions from the "...119.7 acres of disturbance..." due to fugitive dust emissions generated by vehicles traveling on unpaved roads and exceed the California Ambient Air Quality Standard for this pollutant. The same transport of criteria pollutants, e.g. PM-10 and ozone, will occur in the future from any new heavy industrial, commercial, and economic development projects resulting from the construction of the 500-kV SRPL line.

- 7) The maps upon which SDG&E used at the scoping meeting to plan the routing of the SRPL were considered to be out-dated and it is very difficult to determine the impact of the proposed transmission line without knowing the "exact" routing of the line.
- 8) Aesthetic impacts from the proposed SRPL 500-kV transmission line was raised at the scoping meeting, "power lines make the desert look ugly" and "please preserve our rural beauty" and noise concerns in the desert, i.e. "you can hear the 'hum' from miles away", should be addressed in the environmental document. Other concerns included the need for "paleontology studies; ozone layer; global warming; transmission line impacts on residences with small, school-age, children; need to use existing corridors; the need for stronger compensation measures for conservation and renewable energy options; undergrounding transmission lines; and, the political manipulation of power costs on future customers.

In 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 (east of Mexicali) and, in so doing, promote the proliferation of new power generating facilities in that area which would significantly exacerbate air pollution throughout the entire Imperial-Mexicali Valley basin. An EIR for this project must address this power plant-growth inducing impact as well as (1) its associated potential for increased emissions of pollutants, (2) its incumbent health risks, and (3) the creation of strong, enforceable bi-national mitigation measures to negate those impacts.

Also, the state/federal environmental document should consider all measures that will avoid impacts to Imperial County's growing dairy industry as well as identify the potential earthquake impacts on the above transmission line and in the event of a catastrophic event, identify the emergency actions to be taken by Federal, Imperial County and the Mexican authorities.

We look forward to reviewing the joint state/federal document along with any proposed mitigation measures, air quality off-sets, or avoidance measures for the above impacts. The County reserves the right to review options to insure appropriate mitigation has been included prior to any federal and state approvals of the SRPL transmission line.

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

Sincerely,


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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

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