



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

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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.

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.
- 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.
- 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.

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.

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.

- 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.

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.

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.

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.

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

Sincerely,



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

cc: Ralph Cordova, County Executive Officer
Michael Rood, County Counsel
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Darrell Gardner, Asst. Planning & Dev. Services Director
Brad Poiriez, 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