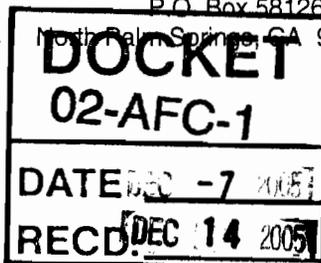




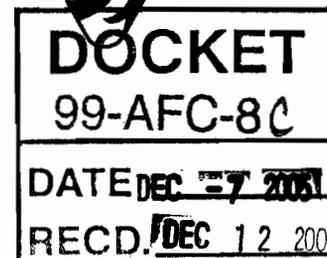
# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Palm Springs-South Coast Field Office  
690 West Garnet Avenue  
P.O. Box 581260

North Palm Springs, CA 92258-1260



DEC - 7 2005



In Reply Refer To:  
2800/CACA-44491 (P)

Dear Reviewer:

Enclosed for your review and comment is the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Desert Southwest Transmission Line Project. This EIS/EIR was jointly prepared by the Bureau of Land Management (BLM) and the Imperial Irrigation District (IID). The BLM is the lead Federal agency for preparation of this EIS/EIR under the Federal Land Policy and Management Act of 1976 (FLPMA) and the National Environmental Policy Act of 1969, as amended (NEPA). The IID is the lead State of California agency for the preparation of this EIS/EIR in compliance with the requirements of the California Environmental Quality Act (CEQA).

The Draft EIS/EIR for this project analyzed the proposed project and four alternatives as well as identified an agency preferred alternative. Both the BLM and IID held public meetings on this draft document in the California communities of Blythe, El Centro and La Quinta and received 28 written comments from the public. This Final EIS/EIR was developed as a result of these public comments, internal review and discussion with other agencies.

The National Environmental Policy Act provides for a 30 day period, after notice is made in the Federal Register that the Final EIS/EIR is filed with the Environmental Protection Agency (EPA), before an agency can make a decision on the proposed project. The public and other agencies may provide comments to the BLM on this Final EIS/EIR during this 30 day period. Comments may be provided to the above address or by Internet to [dgomez@ca.blm.gov](mailto:dgomez@ca.blm.gov). Please include in the subject line: "Final EIS/EIR, Desert Southwest Transmission Line Project" and your name and return address in your Internet message. If you do not receive a confirmation that we have received your Internet message, contact Diane Gomez at (760) 251-4852.

Upon closure of the 30 day period, the BLM will issue a Record of Decision (ROD) for the proposed project that will identify and discuss all factors which were balanced by the agency in making its decision. This ROD will be provided to those on the mailing list for this EIS/EIR. In addition, this Final EIS/EIR, the ROD, as well as any informational updates on this process will be posted on our internet web site at: [www.ca.blm.gov/palmsprings](http://www.ca.blm.gov/palmsprings).

Thank you for your interest in the management of public lands.

Sincerely,

Gail Acheson  
Field Manager

## LETTER "A" RESPONSES

### CALIFORNIA ENERGY COMMISSION

No response on this page.

STATE OF CALIFORNIA - THE RESOURCES AGENCY  
CALIFORNIA ENERGY COMMISSION  
116 NINTH STREET  
SACRAMENTO, CA 95833-0298

GRAY DAVIS, Governor

P. 02

**LETTER A**

July 2, 2003

02-AFC-1  
CALIF ENERGY COMMISSION  
JUL 02 2003  
RECEIVED IN DOCKETS

Mr. Michael D. Remington  
Imperial Irrigation District  
333 East Barioni Boulevard  
P.O. Box 937  
Imperial, CA 92251

Dear Mr. Remington:

On behalf of the California Energy Commission, I am submitting comments on the Desert Southwest Transmission Project Draft EIS/EIR. Enclosed are comments and suggestions on: Proposed Project and Need (Sections Executive Summary and Introduction); Biological Resources (Section 3.1); Cultural Resources (Section 3.2); Air Quality (Section 3.3); Geology and Soils (Section 3.5); Visual Resources (Section 3.6); Land Use (Section 3.7); Traffic and Transportation (Section 3.10); and Paleontological Resources (Section 3.12);

Should you have any questions, please contact me at (913) 654-4206.

Sincerely,  
*for Bill Pfanner*  
Bill Pfanner  
Blythe II Project Manager  
California Energy Commission

PROOF OF SERVICE (REVISED 6-18-03) FILED WITH  
ORIGINAL FILED FROM SACRAMENTO ON 7-1-03  
*J. Pfanner*

**LETTER "A" RESPONSES**

**IID TRANSMISSION LINE EIR/EIS COMMENTS**

**Project Purpose and Need (Section ES-4)**

**1. BACKGROUND AND COMMENT**

In the Executive Summary (pages ES-4 to 6) and Introduction (pages 1-3 and 1-4), four project objectives are identified. As detailed in Objective 2, one of the basic objectives of the proposed project is to "Provide improved transmission access to new generation sources (e.g., the Griffith Energy Project, the South Point Energy Project, and the Blythe Energy Project) to meet the increased demands for electrical power in IID's service area....". Since the Hobsonway substation/switching station is not shown or described in the EIS/EIS connected to the transmission grid nor to any generating station, the EIS/EIR should explain how the objective would be realized. Also, since the Griffith Energy Project and South Point Energy Project are located in Arizona (even if Hobsonway substation/switching station is connected to the grid), the EIS/EIR should describe how power from facilities in Arizona would be available to the IID system.

A-1

A-2

Objective 2 also states that the Devers to Hobsonway substation/switching station would respond to transmission service and interconnect requests. The EIS/EIR should identify any service and interconnection requests that have been received and describe the purpose.

A-3

Please note that the project description is inconsistent with the project objectives, and the project description and objectives should be updated to address the above comments.

A-4

**2. BACKGROUND AND COMMENT**

Page 2-2 indicates that a Dillon Road substation/switching station would provide a connection to IID's existing Coachella Substation. The EIS/EIR should describe how this connection would be made and at what voltage.

A-5

We also note that the Blythe Area Regional Transmission Study shows a 500 kV connection from the Hobsonway 500 kV circuit to a new 500 kV Coachella bus, but the new 500 kV bus is not connected to IID's 230 kV system. The EIS/EIR should describe how the power from the Hobsonway 500 kV circuit would be routed to IID's loads.

A-6

- A-1 Comment noted. Sections 1 and 2 have been revised.
- A-2 Comment noted. Sections 1 and 2 have been revised.
- A-3 Comment noted. However, this question is outside the scope of this analysis.
- A-4 Comment noted.
- A-5 Comment noted. It is likely that the DSWTP's 500 kV line would connect to IID KN-KS 230 kV Transmission Line. A transformer would be used to step down the voltage from 500 kV to 230 kV. However, the final design of this substation / switching station is not known at this time.
- A-6 See Response A-5.

## LETTER "A" RESPONSES

### IID TRANSMISSION LINE EIR/EIS COMMENTS

P. B4

#### Biology (Section 3.1)

##### 3. BACKGROUND AND COMMENT

Section 3.1.1.5.4.5, page 3.1-28: The Fish and Game Commission was petitioned to list the western burrowing owl as an endangered or threatened species on April 8, 2003. The status of the western burrowing owl as an endangered or threatened species should be updated in the text of the EIS/EIR.

A-7

##### 4. BACKGROUND AND COMMENT

Section 3.1.3.2.3, page 3.1-67: While covering the impacts to federally-listed desert tortoise, the EIR/EIS has not adequately addressed the potential impacts to critical habitat for this species. The EIR/EIS should be more explicit on how much desert tortoise critical habitat will be temporarily and permanently disturbed by the installation of the transmission line(s) and tower(s), and whether this is a significant or insignificant portion of the particular critical habitat unit.

A-8

A-7 Comment noted. However, on February 10, 2004, the USFWS rejected the petition to list the western burrowing owl as either endangered or threatened under the California Endangered Species Act. Therefore, its currently listed status is as a Species of Special Concern as noted in Table 3.1-1 of the Draft EIS/EIR.

A-8 Comment noted. Section 3.1.3.2.3, Special Status Species, has been revised in response to this comment.

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# LETTER "A" RESPONSES

## IID TRANSMISSION LINE EIR/EIS COMMENTS

### Cultural Resources (Section 3.2)

#### 5. BACKGROUND AND COMMENT

Section 3.2.1.3.1.2 on pages 3.2-23-27 does not discuss the resources that are eligible for the National Register of Historic Places. Table 3.2-2 lists all the identified resources, resource type, and the eligibility evaluation. The resource types include archeological sites, rock art sites, trails, sacred areas, and structures. The table should list the eligibility criteria under which the different resources could be eligible for the National Register of Historic Places. This is necessary to understand whether the project might impact a particular resource and the nature of the impact. Mitigation measures have to be based on the identified values (criteria) of the resource so it is necessary to identify all criteria under which each resource is considered eligible.

A-9

#### 6. BACKGROUND AND COMMENT

Section 3.2.2.1.2 on pages 3.2-36-39 discusses effects to prehistoric and historic archeological sites. This section is appropriate, but does not cover all resource types that have been identified, i.e. non archeological resources such as buildings, traditional cultural sites, rock art sites and trails. The EIS/EIR should include a discussion of the effects to other cultural resource types.

A-10

This section discusses the use of a treatment plan that would include a research design to identify actions required for mitigation. This assumes that all of the resources are eligible for information values (Criterion D). The EIR/EIS does not establish that this is the only criterion under which the resources would be eligible. The document needs a thorough discussion of the eligibility of the resources to understand the effects of the project on cultural resources.

A-11

#### 7. BACKGROUND AND COMMENT

Section 3.2.3.1 on pages 3.2-40-41 states that the Treatment Plan will indicate the sites to be avoided and detailed mitigation measures to ensure the avoidance. The project does not have to be constructed within the boundaries of a cultural resource to have an impact. This section assumes that physical avoidance of the resource would eliminate impacts to the resources. The EIR/EIS has not provided sufficient information to draw this conclusion. For some cultural resources, the setting may be a very important aspect of the resources integrity. The alteration of the setting may materially impair the eligibility of some resource types. The eligibility criteria need to be clearly stated for each resource including a discussion of the importance of the aspects of integrity for the eligibility of the resource. Without this discussion, the impacts of the project can not be concluded nor can the appropriate mitigation measures be identified in the treatment plan.

A-12

A-13

#### 8. BACKGROUND AND COMMENT

Section 3.2.3.3 on page 3.2-42 discusses data recovery to reduce adverse impacts. Previous sections of the EIR/EIS indicate that all the sites would be avoided except for unanticipated finds (Section 3.2.3.2, page 3.2-41-42). Again, this assumes that data recovery is the only mitigation that would be necessary and that all eligible resources that would be impacted only contain information values. This has not been established.

A-14

A-9 Comment noted. However, the goal of the Cultural Resources Section of this EIS/EIR is to provide BLM with sufficient data to compare the potential impacts to NRHP eligible sites, and potentially eligible sites, that could result from the construction of the Proposed Project and Alternatives. The analysis is primarily based upon a report entitled *A Class II Cultural Resources Assessment for the Desert-Southwest Transmission Line, Colorado Desert, Riverside and Imperial Counties, California*.

These evaluation of cultural resources combines actual previous significance assessments and when not available, evaluations of similar types of sites throughout the Colorado Desert. Sites already on the NRHP or within BLM ACECs are evaluated here as de facto significant as they are already listed or have BLM recognition as sensitive. The evaluations for all other sites presented in the Cultural Resources Section are therefore theoretical, based on Federal guidelines (National Park Service 1991) and the expected outcome of a formal testing or evaluation program, historical research, and/or Native American Consultation. As such they are applied only to compare relative potential sensitivities and effects on cultural resources from each of the proposed transmission line alternatives. Formal evaluations will be conducted during Class III inventories and evaluations, once a preferred alternative is approved.

In addition, please note that mitigation measures follow the procedures established by the Advisory Council on Historic preservation (ACHP) for compliance with Section 106 of the NHPA and also for compliance with CEQA.

## **LETTER "A" RESPONSES**

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**A-10** Comment noted. Cultural Resources Impact I has been revised to clarify that this impact applies to all significant and potentially significant cultural resources which could be effected by the proposed Project.

**A-11** Please see Response to Comment A-9.

**A-12** Comment noted. However, based on 1) the Class II survey completed for the project, 2) Impact analysis prepared for both the Palo Verde-Devers I and II, and 3) the ability of transmission line projects to span large area of land: project impacts to cultural resources could be mitigated to acceptable levels by avoiding these resources through minor adjustments to the location of earth-disturbing project activities, institution of protection measures, application of appropriate data recovery archaeological methods, or several of these mitigation measures combined.

Also see Response to Comment A-9.

**A-13** Comment noted. However, because the proposed 500kV transmission line would be constructed adjacent to an existing high voltage transmission line, indirect effects to NRHP-Eligible sites are considered negligible.

## LETTER "A" RESPONSES

### IID TRANSMISSION LINE EIR/EIS COMMENTS

in the analysis. Cultural resources identified during the inventory include types that would typically have more values than just information, that is, they would be eligible for criteria other than Criterion D.

A-14

A full discussion of the resources, the eligibility criteria, the resource values, important aspects of integrity, impacts, and appropriate mitigation needs to be provided in the EIR/EIS. If archaeological sites are the only resources that are eligible to the NRHP and Criterion D is the only criterion under which the resources is eligible to the NRHP, then those mitigation measures are sufficient to mitigate the impact.

A-15

If buildings, structures, or archeological sites are eligible under other criteria (A, B, or C) of the NRHP, then the resource needs to be recorded to the Historic American Building Survey/Historic American Engineering Record standards. In addition, public oriented documents need to be developed to provide a mechanism for the public to understand the resource and its importance. If an ethnographic resource is eligible for the NRHP, then mitigation measures need to be determined in consultation with the effected Native American group(s). If mitigation measures will not reduce the impacts to less than significant, then alternatives to the current proposal need to be considered.

A-16

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IID TRANSMISSION LINE  
EIR/EIS COMMENTS

A-14 Comment noted. Please see Response to Comment A-9 and A-12.

A-15 Comment noted. Please see Response to Comment A-9.

A-16 Comment noted. Please see Response to Comment A-9.

## LETTER "A" RESPONSES

### IID TRANSMISSION LINE EIR/EIS COMMENTS

#### Air Quality (Section 3.3)

##### 9. BACKGROUND AND COMMENT

DEIS/EIR p. 3.3-13. General Conformity rule requirements may be misrepresented. Section 3.3.3.4 suggests that if project emissions exceed the *de minimis* thresholds of the General Conformity rule, implementation of mitigation measures would be required. Our understanding of this federal rule is that, although mitigation would be appropriate, a formal conformity determination would also be required if approval of the project (a federal action by BLM) causes emissions over the thresholds. Because project impacts illustrated in Table 3.3-9, Section 3.3.5 would exceed the applicability thresholds of the General Conformity rule, Energy Commission staff recommends that the BLM coordinate with the U.S. EPA to determine whether a formal conformity determination is required.

A-17

##### 10. BACKGROUND AND COMMENT

DEIS/EIR p. 3.3-18. Additional mitigation for reducing air quality impacts during construction is feasible and practical. Section 3.3.5 shows significant air quality impacts related to equipment exhaust and fugitive dust during construction and identifies a number of measures that would reduce the impacts to the extent practical. One measure requires submittal of a comprehensive inventory of equipment, but does not require the inventory to meet any specification or performance standard. Energy Commission staff recommends requiring the equipment in the inventory to meet modern emission standards. Other measures are feasible and should also be considered. Emissions of nitrogen oxides (NOx) and particulate matter (PM<sub>10</sub>) can be further minimized with additional measures restricting construction equipment, fuels, and work schedule.

A-18

Energy Commission staff recommends that Air Quality Impact 1 Mitigation be revised to include the following measures:

- All large construction diesel engines, which have a rating of 50 hp or more, shall meet, at a minimum, the Tier 1 ARB/EPA standards for off-road equipment.
- All large construction diesel engines, which have a rating of 50 to 175 hp and do not meet Tier 2 standards for particulate matter, shall be equipped with catalyzed diesel particulate filters (soot filters), unless certified by engine manufacturers or the air district that the use of such devices is not practical for specific engine types.
- All diesel-fueled engines used for construction shall be fueled only with ultra-low sulfur diesel, which contains no more than 15 ppm sulfur.
- Greater vigilance in the application of dust control methods is required as wind speeds increase.

A-19

A-17 The emissions calculations were updated by applying more detailed information on project design and construction and proposed emission controls. The predicted emissions of all pollutants are less than federal *de minimis* thresholds. Therefore, a conformity determination is not needed. This is addressed in more detail in the response to comment Y-2.

A-18 Air Quality Impact 1 Mitigation has been refined to address this comment. These will be discussed further in the response to comment Y-2. All pollutant emissions are now predicted to be below applicable federal conformity thresholds. They will also be below local significance thresholds except for NOx emissions from tailpipes during the construction phase.

A-19 Regarding the four bulleted mitigation measures proposed:

- As reflected in the revised emission calculations, all construction engines 50 horsepower (hp) and larger will meet Tier I ARB/EPA emission standards.
- As PM<sub>10</sub> emissions are now below applicable local significance thresholds and federal conformity thresholds in each jurisdictional area, it is not necessary that construction diesel engines rated from 50 to 175 hp be equipped with catalyzed diesel particulate filters.
- Regarding ultra-low sulfur diesel fuel, it is assumed that this type of diesel fuel will be sold exclusively in the SCAQMD by the time project construction is initiated (see response to comment Y-7).
- Regarding greater vigilance for dust control and wind speeds, increased wind will dry out the soils more quickly. The need for additional watering will be monitored as a function of the dryness of the soil.

## LETTER "A" RESPONSES

### IID TRANSMISSION LINE EIR/EIS COMMENTS

#### Geology (Sections 3.5)

##### 11. BACKGROUND AND COMMENT

Geologic hazards may be present along the proposed alignment. In general, the most significant identified geologic hazard associated with the proposed transmission line is faulting and seismicity. The proposed line traverses the Holocene (active) San Andreas Fault twice and the pre-Pleistocene Chiricaco and Dillon Faults. A geotechnical report should be prepared that addresses mitigation measures required at Holocene (active) fault crossings. Liquefaction potential may be present in the Coachella Valley due to shallow ground water levels, sandy soils, and high seismicity. The geotechnical investigation should also address mitigation measures if liquefaction potential is present.

A-20

A-20 Comment noted. A geotechnical report will be prepared for the proposed Project as stated under Geology and Soils Impact 2 Mitigation "A geotechnical engineering investigation consistent with California geologic and engineering standards will be conducted for the Proposed Project by a licensed geotechnical engineer. The geotechnical engineer will prepare a report that summarizes the results of a field investigation, including site inspection and soil testing, potential geologic hazards including fault rupture and severe secondary effects of earthquakes (e.g., liquefaction), and design criteria and construction methods to effectively construct the Proposed Project with an acceptable level of risk."

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IID TRANSMISSION LINE  
EIR/EIS COMMENTS

**LETTER "A" RESPONSES**

**IID TRANSMISSION LINE EIR/EIS COMMENTS**

**Visual Resources (Section 3.6)**

**12. BACKGROUND AND COMMENT**

In the absence of BLM established Visual Resource Management (VRM) Classifications, the EIS/EIR contains "interim" VRM Classes for BLM administered lands crossed by the proposed project. These Interim VRM Classes (along with the BLM-developed VRM Classes for a small portion of the Coachella Valley) provided the basis for the visual impact assessment contained in the IID EIS/EIR. Unfortunately, these interim classifications have not been sanctioned by the BLM and therefore, are of limited value.

A-21

The EIS/EIR has concluded that only Class III and Class IV lands would be located along the I-10 corridor from the eastern end of the project area to the CVPA planning area. This may or may not be reasonable, although it should be noted that the BLM identified primarily Class II (more restrictive) lands along the portion of the I-10 corridor within the CVPA planning area.

A-22

Under the BLM system, impacts are determined by comparing the level of visual contrast created with the level allowed under a given VRM classification. Given the questionable nature of the EIS/EIR's interim VRM classifications, it is difficult to determine whether or not a given degree of project-induced visual contrast would be acceptable in a given location (since different VRM classes allow different levels of visual contrast). As the EIS/EIR notes on page 3.6-11: "strong contrasts are allowed in Class IV areas, but would need to be mitigated in Class II and III areas" ... and... "moderate contrasts would be allowed in Class III and IV areas but would need to be mitigated in Class II areas." Thus, the EIS/EIR's methodology would allow for moderate to strong visual contrast without mitigation, throughout the I-10 corridor. The exception is that portion of the I-10 corridor that the BLM has inventoried. Most of that area is Class II and would require mitigation. We recommend that the appropriate mitigation be developed to reduce these impacts and be included in the EIR/EIS.

A-23

**13. BACKGROUND AND COMMENT**

The eastern-most 42 miles of the proposed route have no Key Observation Points (KOP). This may or may not be defensible but there is not enough information to determine this from the EIS/EIR. The poor quality of the base imagery substantially limits the usability of the simulations. Given the poor quality of the imagery, it is difficult to impossible to determine either the accuracy of the simulations or the "story" they tell. What is clear is that the images are presented in a less than life-size scale and tend to understate project impacts. Therefore, we would recommend that new simulations be prepared at life-sized scale and with a more accurate visual presentation.

A-24

**A-21** As stated on page 3.6-3 of the Draft EIS/EIR, Interim Visual Resource Management Classifications and Guidelines are established when a project is proposed and there are no approved VRM classifications to rely upon. These Interim classifications are developed using the guidelines in the BLM VRM Manual Section 8410 and 8411, Visual Resource Inventory and must conform to the land use allocations set forth in the RMP which covers the project area. In the absence of established Visual Resource Management (VRM) Classifications, the Interim classifications are intended to serve as the criteria which are used as guidelines to facilitate the qualitative objective assessment of potential visual impacts associated with project implementation. The interim classifications and the assessment were developed in consultation with the BLM.

**A-22** Comment Noted.

**A-23** Comment noted. Please refer to Section 3.6.2.3, Proposed Project, Alternative A, and Alternative C Impacts and Mitigation Measures, for a discussion of Mitigation Measures.

**A-24** Comment noted. However, new simulations are not required for the following reasons: 1) the eastern most 42 mile of line are in an area with a Class IV contrast rating, strong contrast are allowed in these areas, 2) the transmission line is 1 to 3 mile away from I-10, 3) the transmission line would be adjacent to an existing 500 kV line, and a second line (BEP II Transmission Line) Proposed for the same area, and 4) this is a CDCA designated Utility Corridor.

## LETTER "A" RESPONSES

In addition, "KOPs were selected at various locations along the Proposed Project and alternative transmission line corridors to compare potential project-related visual contrasts with the major features in the existing landscape. KOPs are usually located along commonly traveled routes or at other prominent observation points, such as residential developments, parks or trails. Linear projects such as powerlines are rated from several viewpoints. A total of ten KOPs were selected for the project based on the following factors:

- Most critical viewpoints, e.g. views from communities and road crossings;
- Typical views encountered in representative landscapes, if not covered by critical viewpoints; and
- Any special project or landscape features such as skyline crossings, river crossings, substations, etc."

In addition, the fifteen visual simulations contained in the Draft EIS/EIR present the project structures at their full scale and depict the potential visual changes that may occur with project implementation. The base graphic imagery are photographs that provide a level of visual clarity and understanding sufficient to demonstrate the anticipated visual changes associated with project implementation.

## LETTER "A" RESPONSES

### IID TRANSMISSION LINE EIR/EIS COMMENTS

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#### 14. BACKGROUND AND COMMENT

KOP 1 is described (p. 3.6-16) as being "located near a residential area on Dillon Louisiana Street." The EIS/EIR should identify if this view is representative of the typical visual impact that would be experienced by residents in the nearby residential area.

A-25

#### 15. BACKGROUND AND COMMENT

KOP 2 appears to be oriented perpendicular to the direction of travel along Palm Road (a County-designated scenic corridor). This orientation would not capture the viewing perspective of greatest concern (the landscape within the primary cone of vision for travelers along Palm Road) but does allow for a landform backdrop behind the proposed structures (Figure 3.6-6), potentially reducing structure visual contrast. We recommend that KOP 2 be revised to be oriented within the primary cone of vision for travelers along Palm Road.

A-26

#### 16. BACKGROUND AND COMMENT

KOP 4 may not capture the reasonable worst case visual impact in this area. We recommend that KOP 4 be revised with higher quality images to determine whether or not there is sufficient visual contrast, view blockage, and structural prominence to warrant a determination of significant impact.

A-27

#### 17. BACKGROUND AND COMMENT

KOP 5 is also of concern because the imagery is not sufficient to support a finding one way or the other. Also, since the images for KOP 5 are not provided at a life-size scale, they inherently understate project prominence. We recommend that KOP 5 be provided at a life-size scale with a more accurately rendered image.

A-28

#### 18. BACKGROUND AND COMMENT

KOP 6 is described (p. 3.6-28) as experiencing moderate contrast, which would be in conformance with the Interim Class III designation. The supporting images are of extremely poor quality, but the structures may actually result in a moderate-to-high to high degree of visual contrast. Further, the designation of the area as being Class III has not been confirmed by the BLM and is questionable. We recommend that KOP 6 be prepared at a life-size scale with a more accurately rendered image in order to assess the significance of this visual impact. If necessary, consider the potential mitigation for this location of moving the route further to the south toward the existing SCE 500 kV line.

A-29

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IID TRANSMISSION LINE  
EIR/EIS COMMENTS

A-25 This suggested change has been incorporated into the Final EIS/EIR, Section 3.6.2.3.2, KOP 1.

A-26 Comment noted. However, this KOP is oriented at about 45 degrees to the direction of travel along Palm Road. This view captures the visual contrast of the structures with and without the landform backdrop. This view also demonstrates that this is an existing utility corridor with several transmission lines of various designs.

A-27 Comment noted. Please see Response to Comment A-24.

A-28 Comment noted. Please see Response to Comment A-24.

A-29 Comment noted. Please see Response to Comments A-21 and A-24.

**LETTER "A" RESPONSES**

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**IID TRANSMISSION LINE EIR/EIS COMMENTS**

**Land Use (Section 3.7)**

**19. BACKGROUND AND COMMENT**  
Section 3.7.1, "Affected Environment", generally discusses land use and governmental land use classifications, but this section has insufficient information on current land uses. Maps and necessary text should be provided for the proposed project and alternatives that show the width of the corridors being studied and the numbers/sizes, locations, and types of residences, farmland, and commercial uses located along the route of the proposed project, including vacant parcels zoned for residential and commercial uses. These maps and accompanying text should include the distance of these uses from the proposed project. We are concerned that there may be a cumulative impact to farmland, residential, and commercial property in conjunction with other proposed projects in the area region. There should be an explanation of any significant cumulative impact and possible mitigation.

**A-30**

**20. BACKGROUND AND COMMENT**  
Section 3.7.1.3.1 discusses the proposed new substation/switching station on Hobsonway, but does not discuss the specific land uses of the proposed substation site. This section should include a description of the present use and zoning of the proposed Hobsonway substation site. (e.g. vacant; residential or nonresidential development; irrigated agriculture; timber land; or recreation).

**A-31**

**21. BACKGROUND AND COMMENT**  
Section 2.0, "Alternatives Including the Proposed Action, contains a general discussion of potential impacts, but does not address specific geographic points of potential impact and any necessary specific mitigation. This Section should contain a description of the location of specific geographic points of impact, the nature of the impact, and any necessary mitigation for the proposed project and alternatives.

**A-32**

**22. BACKGROUND AND COMMENT**  
Section 3.7.2.3, "Proposed Project Impacts and Mitigation Measures", refers to the conversion of important farmland and the crossing of two parcels of Williamson Act-designated farmlands by the Proposed Project. The important farmland and Williamson Act parcels should be identified by size and location. If there is a cumulative impact to farmland in conjunction with other proposed projects in the region, there should be an explanation of the significant cumulative impact(s) and discussion of possible mitigation.

**A-33**

**23. BACKGROUND AND COMMENT**  
The community or county location is not listed for eight of the projects in Table 4-1, "Projects and Activities with Potential to Contribute to Cumulative Impacts". Some projects have street names listed (i.e. "The Kohl Ranch Specific Plan Area is located between Avenues 80 and 66 east of Harrison Street."), but there is no indicator of the overall community. The transmission substation projects also need to have general locations listed. A regional map showing each project in proximity to the proposed project, the alternatives, and to each other should be provided. If there is a cumulative impact to farmland, residential, and commercial property in conjunction with other

**A-34**

**A-35**

IID TRANSMISSION LINE  
EIR/EIS COMMENTS 10 JULY 2005

**A-30** Comment noted. Please note that both CEQA and NEPA state that the level of analysis for an impact should be proportional to its significance. As stated in several sections of the EIS/EIR, the proposed project would be located within an existing electrical transmission corridor Right of Way and BLM designated utility corridor and the proposed project is consistent with applicable federal, state, and local land use plans. The goal of this document is to focus on issues that are truly significant to the action in question, rather than amassing needless detail.

**A-31** Potential cumulative impacts are addressed in Section 4.4.

**A-32** The Project connection point would be at Western Area Power Administration's existing Hobsonway Substation located east of the Blythe Energy Project area.

**A-33** Section 2, Alternatives Including the Proposed Action, does not contain a discussion of potential impacts. Section 2 provides a description of the Proposed Action and Alternatives. For a discussion of land use impacts and mitigation measures please refer to Section 3.7.2.

**A-34** Agricultural fields that may be crossed by the project would still remain in agricultural production with implementation of the proposed project. Towers would be located to minimize or eliminate any restrictions to agricultural operations. Specific parcels would be identified when the final alignment is determined. No significant cumulative unavoidable adverse impacts to prime agricultural lands are anticipated.

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proposed projects in the region, there should be an explanation of the significant cumulative impact(s) and discussion of possible mitigation. } **A-35**

**24. BACKGROUND AND COMMENT**  
Section 3.7.1.2.9, "Land Use Planning Documents", and Table 3.7-4, "Summary of Consistency with Land Use Plans", discusses relevant land use planning documents and project consistency with these documents. Table 3.7-4 discusses the need for an amendment to the BLM's California Desert Conservation Area Plan (CDCA) if alternative B were to be adopted. This discussion should contain a detailed description of the CDCA amendment process. This discussion should contain information on the BLM's public meetings on the CDCA amendment process held in December 2000, and March and April 2001, including the level of public attendance at these meetings, and the written public comments received. } **A-36**

**25. BACKGROUND AND COMMENT**  
There is a potential overlap between the Imperial Irrigation District's (IID) proposed project and Southern California Edison's (SCE) Devers-Palo Verde 2 500-kV project. SCE recently notified the California Public Utilities Commission of its preliminary plans. Although SCE's project details are not available to the Energy Commission staff right now, the preferred route would likely parallel SCE's existing Devers-Palo Verde 500-kV line, which appears to be the same as IID's preferred project route up to the Blythe vicinity. } **A-37**

If there is a possibility of two new 500 kv lines (i.e., IID's and SCE's) being placed in the U.S. Bureau of Land Management (BLM) corridor, the Energy Commission staff will need to address that scenario with respect to line separation criteria from the reliability perspective, the potential impacts for areas affected by ground disturbance such as land use, biological, cultural, and visual resources, and soil and water resources, cumulative impacts, and possible mitigation. } **A-38**

**26. BACKGROUND AND COMMENT**  
The EIS/EIR should contain a summary of the nature of any discussions to date between SCE and IID regarding the potential overlap of these transmission line projects including:

- a. A discussion of the minimum line separation criteria required for transmission system reliability purposes in terms of distance (e.g., if there are three 500-kV lines in an area, one must be separated from the other two by a distance of at least one mile to prevent a wildfire or other disturbance from causing a three-line outage).
- b. A discussion of the environmental impact and route implications of the response to Item 2, for each technical area that would be affected (e.g. land use).
- c. A discussion of whether the existing BLM utility corridor would need to be enlarged to accommodate three 500-kV lines (i.e., SCE's existing line, a new SCE line, and the proposed IID line).
- d. A discussion of whether such an enlargement, if needed, would trigger the BLM corridor amendment process and related schedule requirements.

} **A-39**

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**A-35** Table 4-1 has been revised to list city/community locations. Potential cumulative impacts are addressed in Section 4.4 of the Draft EIS/EIR.

**A-36** Comment noted. However, one of the project teams goals, consistent with both CEQA and NEPA, was to avoid amassing needless detail in this environmental document. The California Desert Conservation Area (CDCA) Plan is readily available to the public and a description of the CDCA Plan Amendment process is provided in Chapter 7.

**A-37** Comment noted.

**A-38** Comment noted.

**A-39** The status or nature of any discussions between IID and SCE is not within the scope of this document. However, a variation of the proposed Project, referred to as Variation PP1, that includes shifting the alignment of the Proposed Project approximately 150 ft to occupy the PVD2 right-of-way has been incorporated into the Final EIS/EIR.

- a. The Project Applicant is currently coordinating with WECC regarding the design of the Project. To date WECC has not identified any concern regarding line separation.
- b. Impact analysis for Variation PP1 has been incorporated into the Final EIS/EIR.
- c. BLM Corridor "K" is 2 to 4 miles wide, therefore the corridor would not need to be enlarged.
- d. A CDCA Plan Amendment would not be required.

## LETTER "A" RESPONSES

IID TRANSMISSION LINE EIR/EIS COMMENTS  
Traffic and Transportation (Section 3.10)

**27. BACKGROUND AND COMMENT**

Section 3.10.1 discusses the access roads along the existing transmission line corridors that would provide access to a majority of the Proposed Project and alternative transmission line routes. Except for major highways, a detailed description regarding these roads is not included. This section should include a map and description of the access roads for the Proposed Project and alternatives that include each road's location, and an analysis of any construction and operations period traffic impacts. For the access roads that are not gated or where public access is not limited in some manner, there may be a cumulative transportation impact in conjunction with other proposed projects in the region. The EIS/EIR should discuss any significant cumulative impacts and possible mitigation measures.

A-40

**A-40** Proposed access roads are shown Biological Resource Maps in Appendix J of the Draft EIS/EIR. The final selection of access roads will be determined based on environmental constraints identified during the preconstruction biological, cultural, and geotechnical surveys, mitigation measures contained in this EIS/EIR, applicable regulatory permit conditions, final engineering design requirements, and contractor preferences. In addition, a traffic control plan will be required for federal, state, and local Encroachment Permits. In addition, access road requirements will be specified in the COM Plan.

## LETTER "A" RESPONSES

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#### Paleontological Resources (Section 3.12)

##### 28. BACKGROUND AND COMMENT

The proposed transmission line crosses geologic units that are known to contain fossil resources and have been assigned a high sensitivity rating with respect to paleontological resources. A paleontological field survey and literature review should be performed as part of the EIS/EIR and filed with IID and BLM as a confidential supplement. If the proposed project crosses private or state administered lands, the project should address state laws, ordinances and regulations, including California Environmental Quality Act (CEQA). If the project crosses BLM administered land then federal laws, ordinances and regulations for protection and salvage of paleontological resources, including the National Environmental Policy Act (NEPA), need to be identified for compliance.

A-41

A-41 Information on paleontological resources is included in the EIS/EIR. Preconstruction surveys of identified sensitive areas would be conducted and potential impacts to paleontological resources would be minimized by proper site design, tower placement location and other impact avoidance strategies which will be incorporated into final project design.

Please refer to Section 3.12.2, Regulatory Setting, for information about the regulatory requirements for Paleontological resources. In addition, refer to pages 3.2-31 through 3.2-35 for details of the mitigation measures.

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# Document Information

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## OVERSIZED FILE

Cd of South West Transmission Line

Project Final EIS/EIR

*may be viewed at the CEC Docket Unit*

MAP(S) # \_\_\_\_\_

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PICTURE(S) # \_\_\_\_\_

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