

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 95814-4218

P. 02
GRAY DAVIS, Geompr

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 Barton Boulevard
P.O. Box 937
Imperial, CA 92251

Dear Mr. Remington:

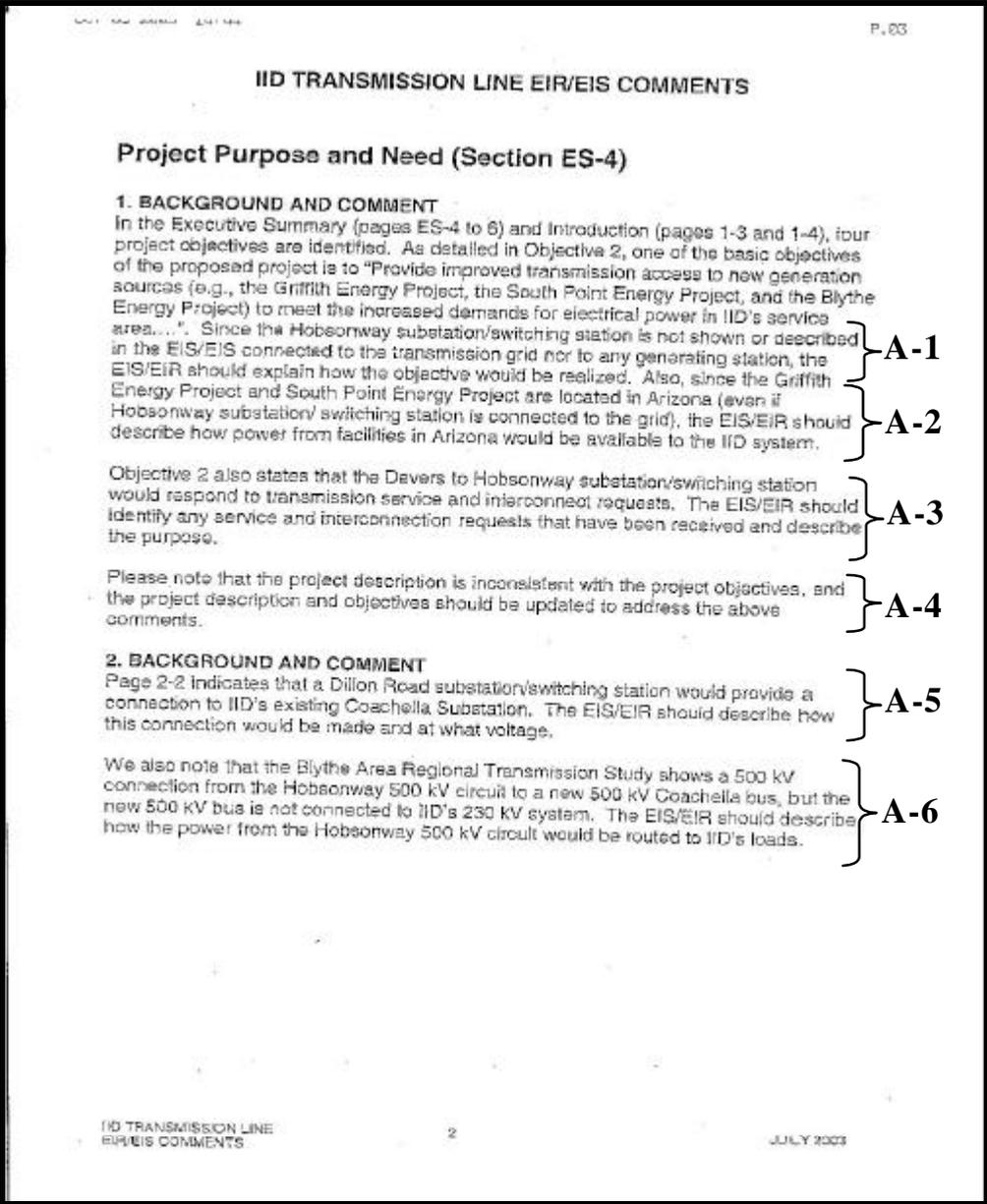
On behalf of the California Energy Commission, I am submitting comments on the Desert Southwest Transmission Project Draft EIS/EIR. Enclosed are comments and suggestions on: Proposed Project and Need (Sections Executive Summary and Introduction); Biological Resources (Section 3.1); Cultural Resources (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 (916) 654-4206.

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

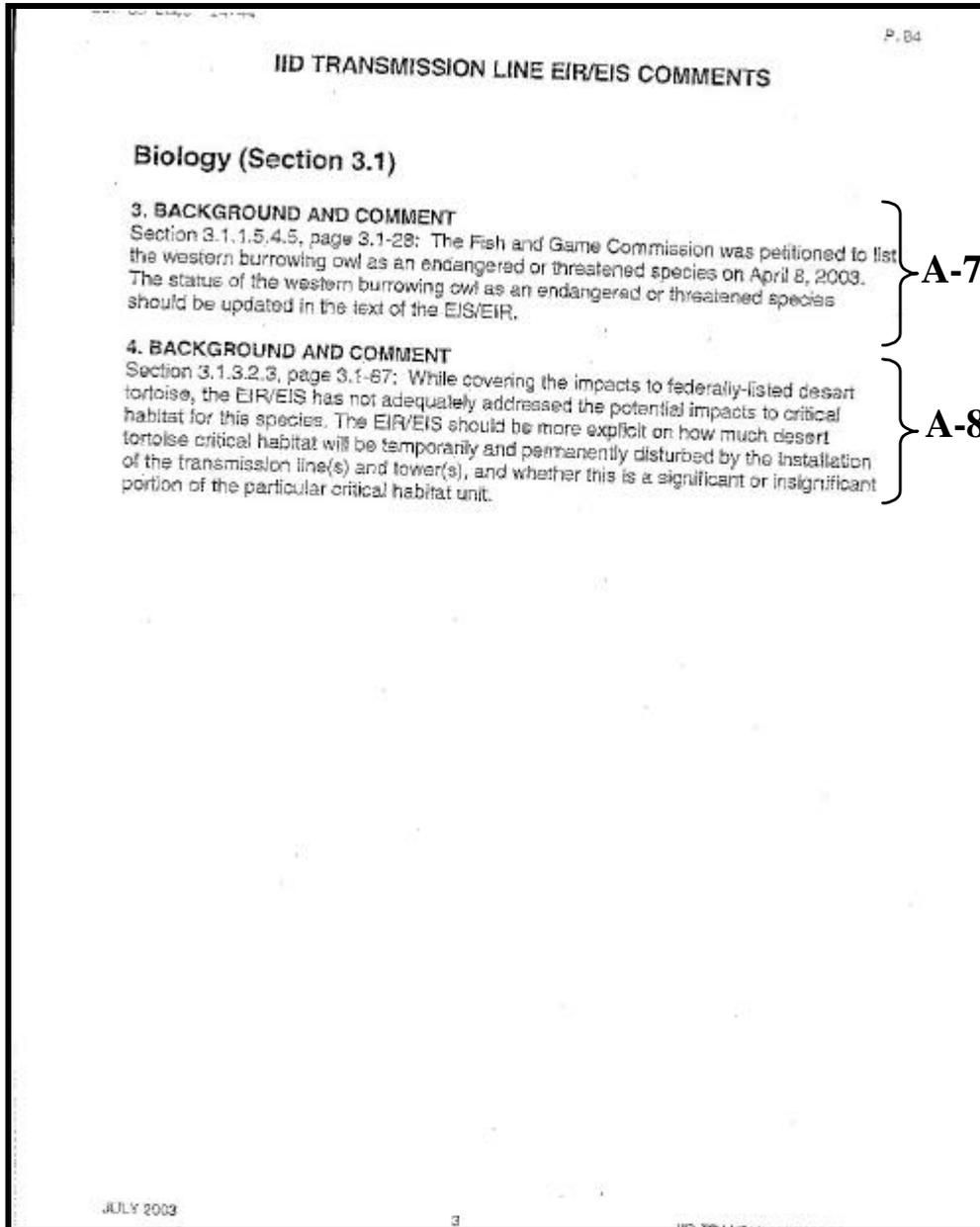
PROOF OF SERVICE (REVISED 6-18-03) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 7-8-03
J. Johnson

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- 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.

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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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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 EIR/EIS 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

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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.

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A-10 Comment noted. Cultural Resources Impact 1 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.

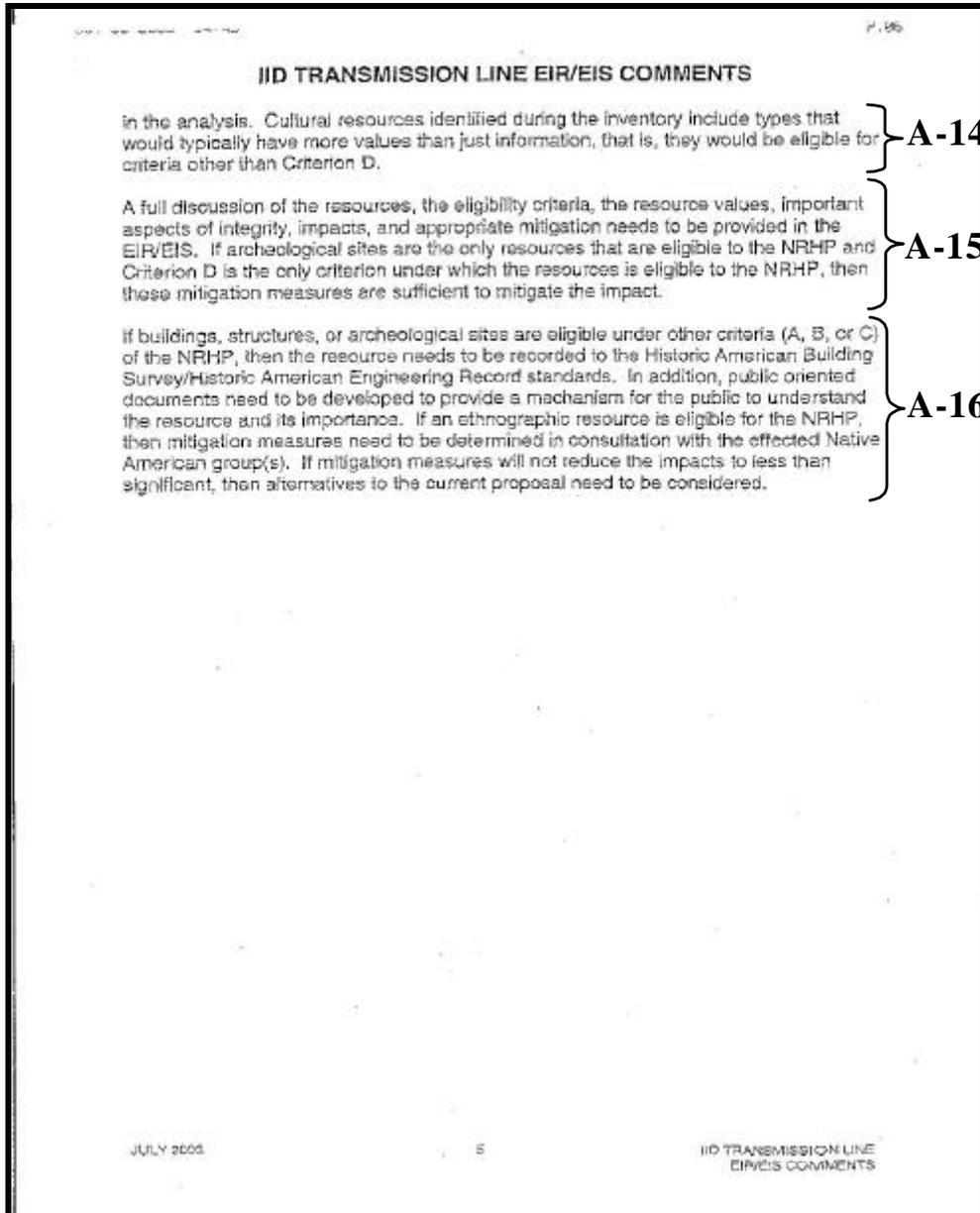
A-11 Please see Response to Comment A-9.

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.

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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.

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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 (PM₁₀) 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

IID TRANSMISSION LINE
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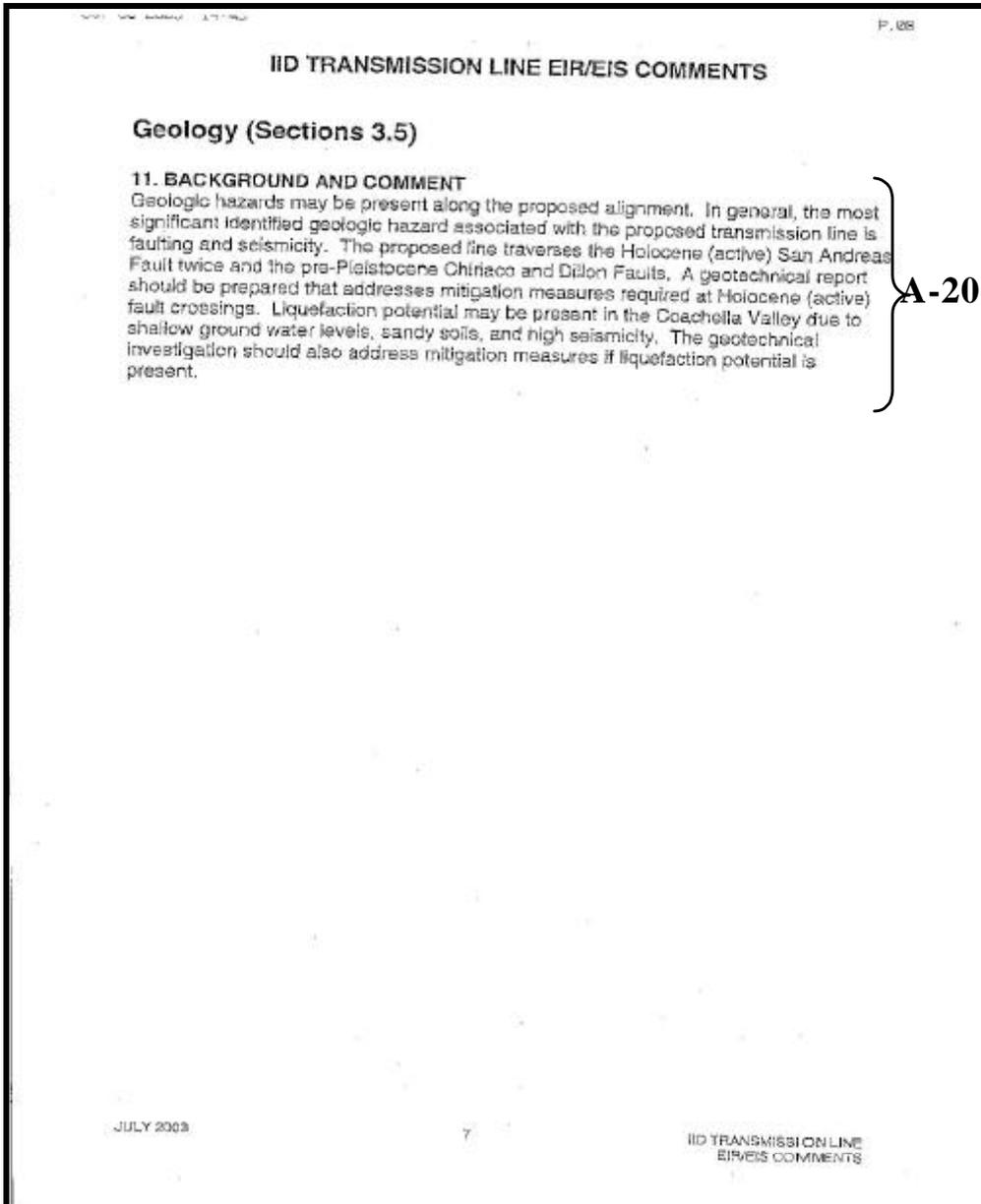
A-17 The emissions calculations were updated by applying more detailed information on project design and construction and proposed emission controls. The predicted emissions of all pollutants are less than federal *de minimis* thresholds. Therefore, a conformity determination is not needed. This is addressed 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 PM10 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.

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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

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**

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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.

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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.

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HD TRANSMISSION LINE EIR/EIS COMMENTS

14. BACKGROUND AND COMMENT
KOP 1 is described (p. 3.6-16) as being "located near a residential area on Dillon Louise 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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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.

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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.

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).

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.

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.

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 60 and 68 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

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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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IID TRANSMISSION LINE EIR/EIS COMMENTS

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 3.7.1.2.8, "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.

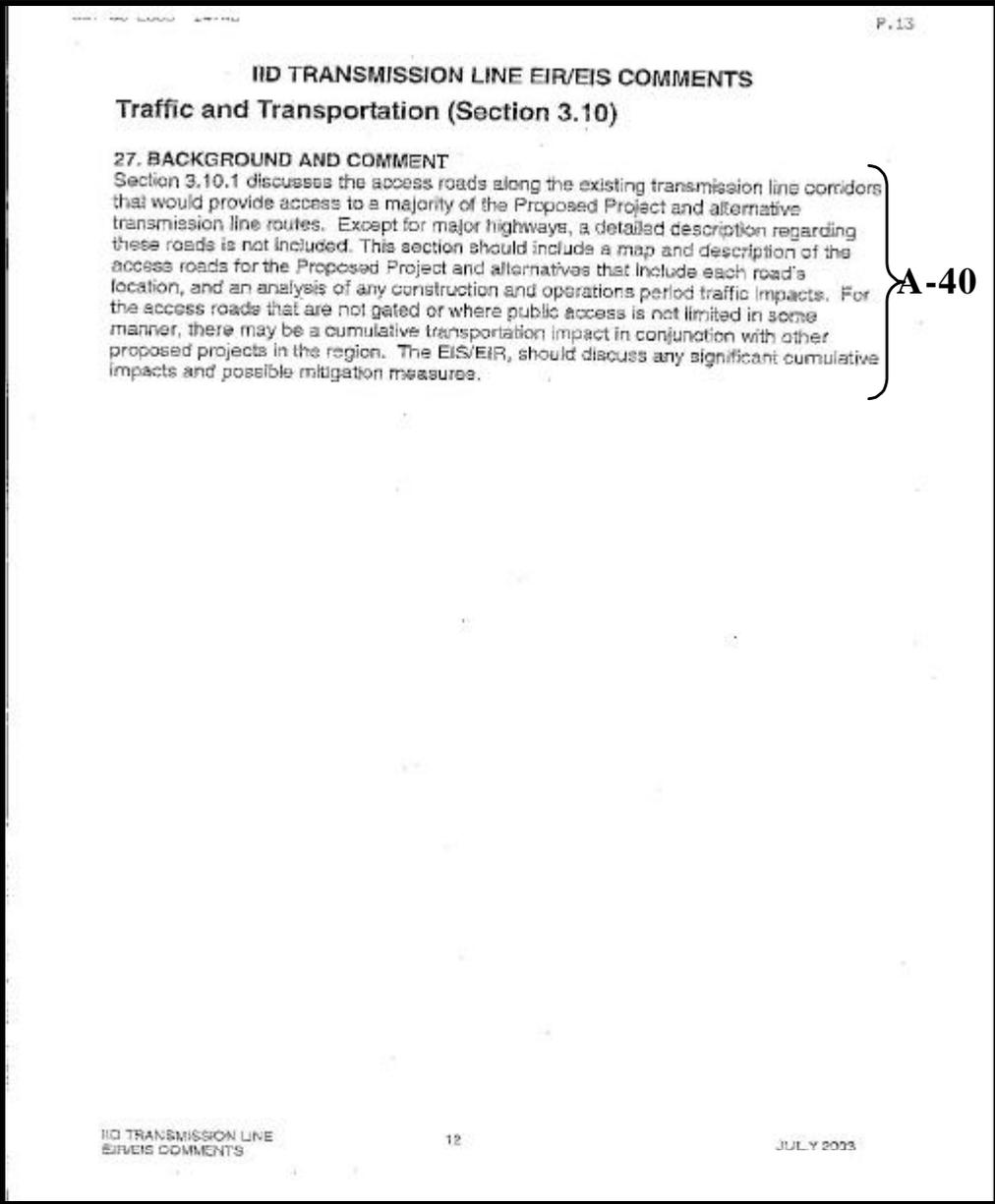
a. The Project Applicant is currently coordinating with WECC regarding the design of the Project. To date WECC has not identified any concern regarding line separation.

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.

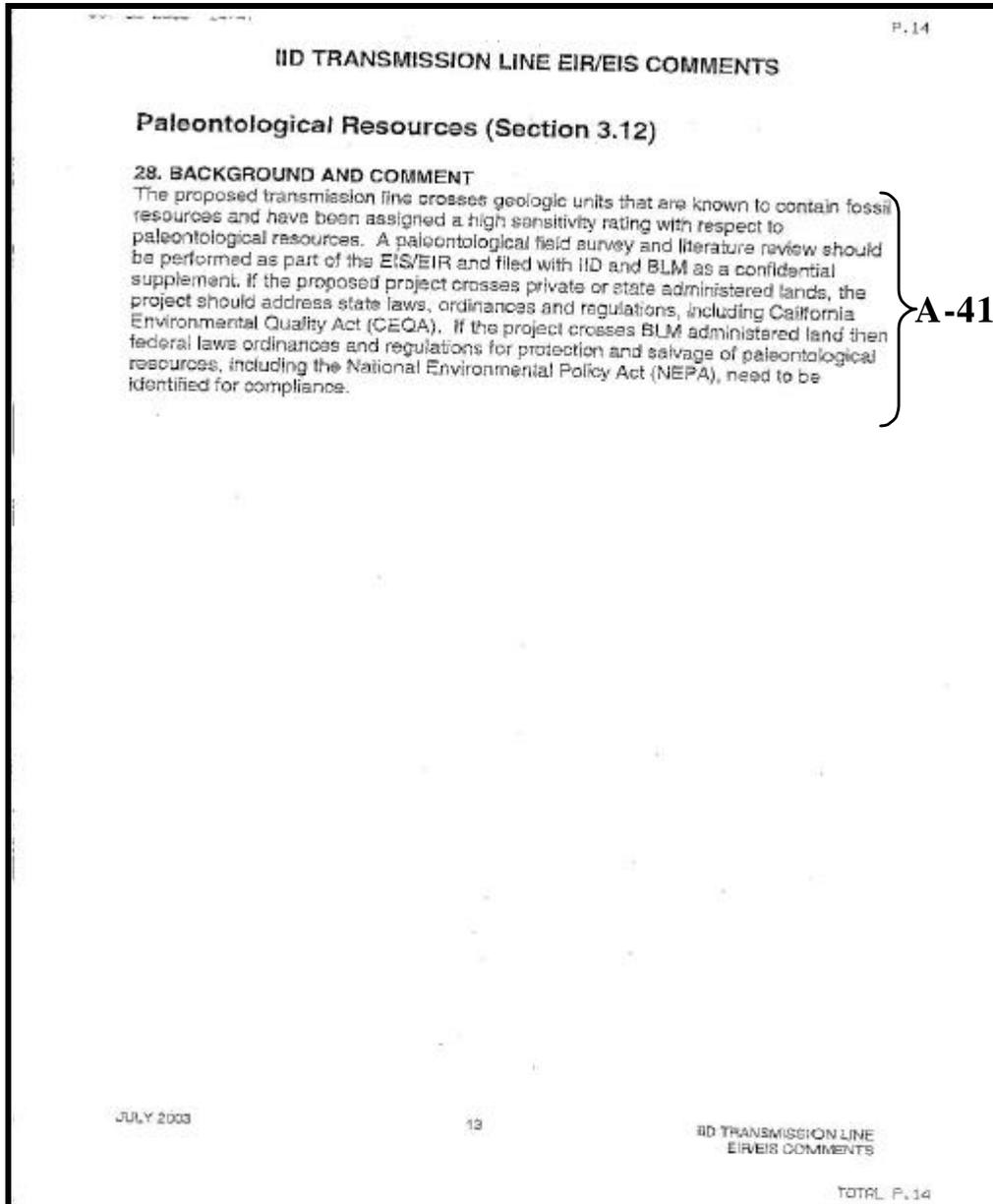
d. A CDCA Plan Amendment would not be required.

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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.

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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.

LETTER "B" RESPONSES

IMPERIAL COUNTY PLANNING/BUILDING DEPARTMENT

No response on this page.



PLANNING/BUILDING DEPARTMENT
IMPERIAL COUNTY
03 OCT 17 AM 11:52
PLANNING / BUILDING INSPECTION / PLANNING COMMISSION / A.L.U.C.
JORG HEUBERGER, ACP, CBP
PLANNING/BUILDING DIRECTOR

October 13, 2003

James G. Kenna
Field Manager
BLM Palm Springs
South Coast Field Office
P.O. Box 581280
North Palm Springs, CA 92258-1260

LETTER B

SUBJECT: Response to "Draft EIS/EIR, Desert Southwest Transmission Line Project" from Blythe to Palm Springs, California

Dear Mr. Kenna:

The Planning/Building Department received on October 6, 2003, your "Draft EIS/EIR for the above transmission line project from Blythe to the Palm Springs Devers Substation, near Palm Springs, dated September 29, 2003. This joint environmental document is being prepared by the Imperial Irrigation District (IID) acting as the California Environmental Quality Act (CEQA) "Lead Agency" and the Bureau of Land Management (BLM) acting as the NEPA "Lead Agency". The proposed project is the construction, operation and maintenance of a new transmission line from a new substation/switching station north of Hobsonway, west of the Blythe Power Plant and then approximately 118 miles to the existing Devers Substation.

The proposed new transmission line is to be either a "230-kV or 500-kV" transmission line to meet future IID power transmission requirements. The County previously submitted comments to the Imperial Irrigation District's "Notice of Preparation" of the joint "EIR/EIS" that was dated August 8, 2002. The deadline for the comments on the BLM/IID Draft EIS/EIR is set for ninety (90) days after the notice is published in the Federal Register, i.e. on or about the end of the year. As previously provided, the County staff still has the following concerns and comments:

599 MAIN STREET, SUITE B-1, EL CENTRO, CA 92243-2656 (760) 482-4236 FAX (760) 353-8338
E-MAIL: planning@imperialcounty.net pln99@imperialcounty.net www.eocal.org/department/ewp/cwz/

LETTER "B" RESPONSES

James G. Kenna
Draft EIS/EIR Response
Page Two

(1) If the Alternative B option is chosen by BLM for the route through Imperial County to the "Midway Substation" for the proposed "230-kV or 500-kV" transmission line, the zone in this area is S-2 (Open Space/Preservation) and the height limit for structures is forty (40) feet. Since the proposed height of the transmission line exceeds 40 feet, the project would require a "Variance" and be subject to review by the Airport Land Use Commission for a consistency determination with the 1996 Airport Land Use Compatibility Plan for potential impacts to military activities on the adjacent Chocolate Mountain Gunnery Range and the two existing targets in the East Mesa area.

B-1

(2) Again, if the "Alternative B" and "Alternative B-1" into Imperial County is selected, this would involve the possible revision to the Palo Verde Community Area Plan if an BLM/IID approved "230-kV" or "500-kV" transmission line is to be routed southward through and/or around the townsite of Palo Verde and then eastward to the Colorado River.

B-2

It should be noted that the County's General Plan, Geothermal and Transmission Element, Figure D-2, shows the "Federal Transmission Planning Corridors" and the proposed "Alternative B-1" option would be outside of the existing County planning corridor and would therefore be inconsistent with the County's General Plan.

B-3

Upon selection of the preferred BLM/IID route, appropriate measures to ensure compatibility between the BLM's CDCA amendment and County General Plan, Geothermal/Transmission Element, should be outlined in the Final EIS/EIR as applicable.

B-4

(3) The Draft EIS/EIR still does not identify geothermal power plants that IID would be utilizing in the near to mid-term period, e.g. the CE Obsidian Energy LLC, 185-MW (net) geothermal power plant currently being processed through the California Energy Commission and the County of Imperial.

B-5

The Draft EIS/EIR "Alternatives" section, Table 2-12, pages 2-37 through 2-39, does not identify the above geothermal project or any future projects that may utilize the County's indigenous geothermal energy resource to produce electrical energy.

We look forward to receiving the Final EIS/EIR and reserve the right to provide additional comments on the BLM/IID environmental document at future public meetings on the proposed IID and BLM transmission line.

B-1 The requirement for a Variance for structures in Imperial County (S-2 Zone) has been added to the list of potential permits and approvals that maybe required for the project, see Section 1.7, Permits, Approvals, and Regulatory Requirements, of the Draft EIS/EIR.

B-2 The requirement for a Plan Amendment (i.e., Palo Verde Community Area Plan) has been added to the list of potential permits and approvals that maybe required for the project, see Section 1.7, Permits, Approvals, and Regulatory Requirements, of the Draft EIS/EIR.

B-3 The requirement for a Plan Amendment (i.e., General Plan) has been added to the list of potential permits and approvals that maybe required for the project, see Section 1.7, Permits, Approvals, and Regulatory Requirements, of the Draft EIS/EIR.

B-4 Comment noted. Land use impacts and related mitigation measures are outline in Section 3.7.2.

B-5 Comment noted. A Geothermal Alternative has been added to Table 20-12 in response to this comment.

LETTER "B" RESPONSES

James G. Kenna
Draft EIS/EIR Response
Page Three

If you have any questions regarding the above, please contact me at 482-4236, extension 4310, or via the internet at jurghsuberger@imperialcounty.net.

Sincerely,


~~JURGH SUBERGER, AICP, CEP~~
Planning Director

cc: Roberta Burns, County Executive Officer
Ralph Cortinovs, County Counsel
Jeanna L. Yeager, Asst. County Counsel
Darrell Gardner, Asst. Planning Director
Greg Thomson, ELM/EI Centre Field Office
Jay von Weerhof, Consultant for IVC Museum
Terry Collins, Southeast Desert Information Center
randy Risher, County Property Services/CF&GC
Tim James, Director, Public Works Department
Captain Paul Ziegler, Commanding Officer, NAF/EI Centre
BLM Correspondence File
10.109

JHDS/RCUM/cv/GMecLto/ID&ELMDEI/EIR/Response

No response on this page.

LETTER "C" RESPONSES

RIVERSIDE COUNTY
AIRPORT LAND USE COMMISSION
RIVERSIDE COUNTY

03 OCT 29 PM 12:08
PALM SPRINGS-SOUTH COAST
REFUND AREA

October 15, 2003

LETTER C

RE: NOP Desert Southwest Transmission Project

Dear Mr. Kenna:

Thank you for the opportunity to respond to the EIS/EIR for your project. In response I have included an Executive Summary of the Comprehensive Land Use Plan for the Blythe Airport and now Chiriaco Summit. They were adopted in 1993 and will be updated this year.

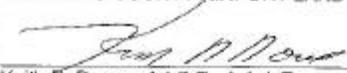
As stated in the August 5th letter the Airport Land Use Commission must review any portion of the project within the influence area or the airports. The attached form outlines what needs to be included with your application for review. That assessment will need to compare the criteria of the plan in regards to aeronautical safety, noise and obstructions to your project. } **C-1**

We are looking forward to reviewing the document and rendering any assistance with your project. Please note again that our address has changed as indicated on the letterhead.

Should you have any questions regarding this action, please contact me at (909) 351-0700 ext 204.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION


Keith D. Downs, A.I.C.P., A.A.A.E.
Executive Director

CHAIR
Ric Stephens
Riverside

VICE CHAIRMAN
Allen Graff
Hemet

COMMISSIONERS

Paul Bell
Riverside

Will Snyder
Palm Desert

Jon Goldenbaum
Riverside

Marge Landy
City of Hemet

Sam Pratt
City of Torrance

STAFF
Keith D. Downs
Executive Director
A.I.C.P., A.A.A.E.
1100 Alhambra Ave.
Riverside, CA 92504
Tel: (951) 511-0124

Bureau of Land Management
Palm Springs-South Coast Field Office
690 West Garnet Avenue
P.O. Box 581260
North Palm Springs, CA 92258-1260
Attn: James Kenna

AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

C-1 Comment noted. Consistency with applicable Airport Land Use Plans is fully evaluated in the Draft EIS /EIR in Section 3.7, Land Use. As part of final design and permitting, the Commission will be contacted and provided with the needed information. The complete list of potential permits and approvals that maybe required for the project are listed in Section 1.7, Permits, Approvals, and Regulatory Requirements, of the Draft EIS/EIR.

LETTER "C" RESPONSES

Page 2
October 15, 2003

KDD:jg

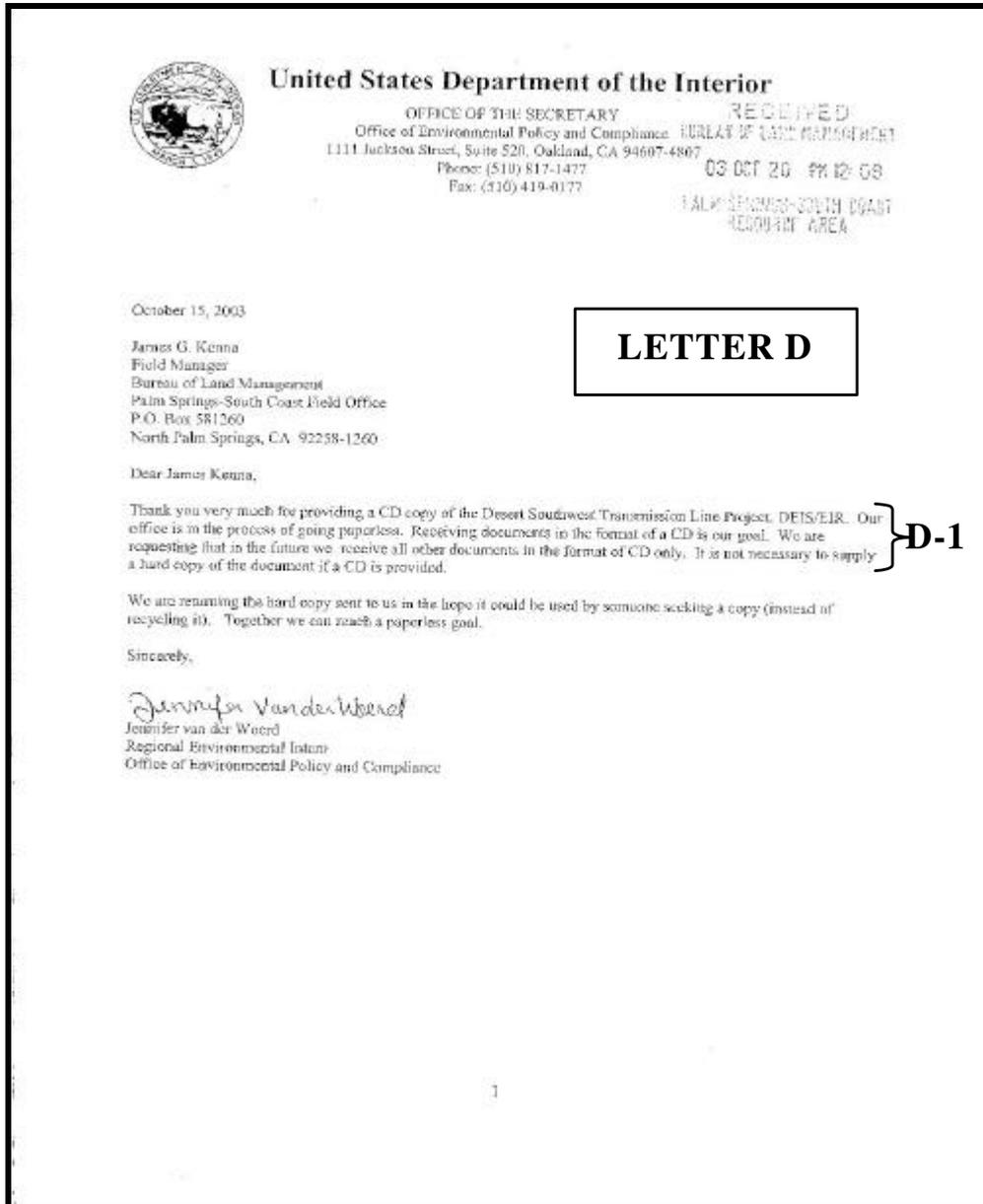
Enclosure: Application Form

cc: Robert Field, Aviation Supervisor
Commissioners
Dave Fitz, Coffman Associates
Ken Brody, Mead & Hunt
Charles Hull, City of Blythe
Michel D. Remington, Imperial Irrigation District
Sandi Hesnard, Caltrans Aeronautics

F:\Shared\EDCOM\REPORTS\ALUC\NOP\LR101503.doc

No response on this page.

LETTER "D" RESPONSES



UNITED STATES DEPARTMENT OF THE INTERIOR

D-1 Comment noted.

LETTER "E" RESPONSES

LETTER E



"al frowiss"
<alfrowiss@nethere.com>

10/31/2003 09:04 PM

To: <dgomez@ca.blm.gov>
cc:
Subject: "draft eis/eir desert southwest transmission line project."

Gentlemen:

In the event you have mitigation requirements in relation to this project, I would like to offer for your consideration the prime habitat mitigation land I own and have for sale abutting the BLM's San Sebastian Marsh/San Felipe Creek ACEC in Imperial County. The attachment herewith, or below copied, describes the quarter section, long covered for ownership by BLM El Centro for management of the ACEC. BLM offered to acquire the land around 1992 but the fractionated title then had clouds, since cleared. The land price is negotiable, subject to appraisal of course, and abutting land Sections 33 and 31 sold in 2001 for \$500/acre.

E-1

Land For Sale: Habitat Replacement/Critical Resource Management

Location: San Sebastian Marsh/San Felipe Creek ACEC (Area of Critical Environmental Concern) and Habitat Management Plan

Imperial County; NE/4 S34, T12S, R10E, 160 acres +/- (APN 018-180-19)

This sensitive and vital resource land, privately held since a 1924 patent, today has clear and marketable title for the first time since 1963. It has previously and repeatedly been identified as an important acquisition target in support of the U.S. BLM and California DFG management objectives for the San Sebastian Marsh/San Felipe Creek ACEC, West Mesa, Imperial County. This parcel lies along the southern portion of the present ACEC and is transected by the old Julian-Kane Spring Road (historic Butterfield Stage trail, in use until the early 1830's when Hwy 78 was built nearby), and washes from nearby Superstition Hills to the south, feeding into San Felipe Creek to north.

Background and Resource Summary of HMP and ACEC: Citing excerpts of the 1986 Plan authored by BLM and CDFG, the San Felipe Creek and San Sebastian marsh provide a corridor of unique and valuable habitat. The portion of the stream between Tarantula Wash and Harper's Well Wash is spring fed and perennial. A series of interrupted pools persist over in the most dry years. Six primary habitat types occur: marsh, creosote bush scrub, mesquite woodland, mesquite dune, alkali sink scrub, and wash community. Wildlife species of special concern include desert pupfish, San Felipe leopard frog, flat-tailed horned lizard, Colorado desert fringe-toed lizard and riparian birds. Plant species of special concern in or near the ACEC include Peirson's milkvetch, Wiggins cholla, Thurber's pilostyles and sandreed. Cultural resources in the ACEC are rich in prehistoric and historic human use centered around the marsh environment.

Ownership: Consolidated from nine fractional estates into two. For sale at a reasonable price. Likely sale agreement at \$160,000, i.e., \$1,000/acre. Frowiss, B's owner, is spokesperson for the ownership entity.

Albert B. Frowiss
P.O. Box 909
Rancho Santa Fe, CA 92067 USA
859 756,1494 phone & fax
please reply to: frowiss@frowiss.org

----- Message from "al frowiss" <alfrowiss@nethere.com> on Tue, 14 Oct 2003 09:34:00 -0700 -----

ALBERT B. FROWISS

E-1 Comment noted.

LETTER "E" RESPONSES

Subject HABITAT
LAND

Land For Sale: Habitat Replacement/Critical Resource Management

Location: San Sebastian Marsh/San Felipe Creek ACEC (Area of Critical Environmental Concern) and Habitat Management Plan

Imperial County: NE/4 S34, T12S, R10E, 160 acres +/- (APN 018-180-19)

This sensitive and vital resource land, privately held since a 1924 patent, today has clear and marketable title for the first time since 1963. It has previously and repeatedly been identified as an important acquisition target in support of the U.S. BLM and California DFG management objectives for the San Sebastian Marsh/San Felipe Creek ACEC, West Mesa, Imperial County. This parcel lies along the southern portion of the present ACEC and is transected by the old Julian-Kane Spring Road (historic Butterfield Stage trail, in use until the early 1930's when Hwy 78 was built nearby), and washes from nearby Superstition Hills to the south, feeding into San Felipe Creek to north.

Background and Resource Summary of HMP and ACEC: Citing excerpts of the 1986 Plan authored by BLM and CDFG, 'the San Felipe Creek and San Sebastian marsh provide a corridor of unique and valuable habitat. The portion of the stream between Tarantula Wash and Harper's Well Wash is spring fed and perennial. A series of interrupted pools persist even in the driest years. Six primary habitat types occur: marsh, creosote bush scrub, mesquite woodland, mesquite dune, alkali sink scrub, and wash community. Wildlife species of special concern include desert pupfish, San Felipe leopard frog, flat-tailed horned lizard, Colorado desert fringe-toed lizard and riparian birds. Plant species of special concern in or near the ACEC include Peirson's milkvetch, Wiggins cholla, Thurber's pilostyles and sandfood. Cultural resources in the ACEC are rich in prehistoric and historic human use centered around the marsh environment.'

Ownership: Consolidated from nine fractional estates into two. For sale at a reasonable price. Likely sale agreement at \$160,000, i.e., \$1,000/acre.

No response on this page.

LETTER "E" RESPONSES

Frowiss, 8/9ths owner, is spokesperson for the ownership entity.

Albert B. Frowiss
P.O. Box 909
Rancho Santa Fe, CA 92067 USA
858.756.1494 phone & fax
please reply to: frowiss@frowiss.org

No response on this page.

LETTER "F" RESPONSES

DEPARTMENT OF TRANSPORTATION

No response on this page.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVID, Governor

DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS MS 40
1120 N STREET
P.O. BOX 942873
SACRAMENTO, CA 94273-0001
PHONE (916) 654-4959
FAX (916) 653-9531
TTY (916) 651-6827

RECEIVED
BUREAU OF LAND MANAGEMENT
03 NOV 12 AM 9:39
PALM SPRINGS-SOUTH COAST
RESOURCE AREA

Let your power
Be energy efficient

November 5, 2003

Mr. James G. Kenna
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

LETTER F

Dear Mr. Kenna:

Re: *Desert Southwest Transmission Line (CA66.00, 2800/CACA-44491.P)*
SCH# 2001041105

Thank you for including the California Department of Transportation (Department), Division of Aeronautics in the environmental review process for the above-referenced project. We have reviewed the Environmental Impact Statement / Environmental Impact Report (EIS / EIR), dated September 2003, and offer the following comments relative to airport land use compatibility.

1. The proposed project is the construction and operation of a new substation / switching station and an approximately 118-mile transmission line. The new substation / switching station would be located near Blythe, California, and the transmission line would extend from this location to the Devers Substation north of Palm Springs, California. The proposed transmission line would follow an east-west alignment from the new substation / switching station to the Devers Substation. The Proposed Project transmission line would be located along existing transmission line rights-of-way for much of its alignment, and would utilize existing access roads, requiring a limited amount of new access road construction. Substation / switching station construction would be necessary at a new facility on Hobsonway, approximately 4.5 miles west of Blythe, and substation equipment modifications would be necessary at the existing Devers Substation. Four alternatives to the Proposed Project are also being considered, and analyzed in the EIS / EIR: Alternative A is a second northern route alignment; Alternative B is a southern route alternative that would include upgrading and use of certain existing transmission facilities; Alternative C is a third northern route alignment slightly north of the Proposed Project alignment; Alternative D is the No Project Alternative, whose discussion is required by the National Environmental Policy Act. The Land Use section of the EIS / EIR identifies that the Proposed Project and all build alternatives may be incompatible with the Blythe Airport Comprehensive Land Use Plan. According to the EIS / EIR, Alternative B may also require consistency review by the Imperial County Airport Land Use Commission.

"California improves mobility across California"

LETTER "F" RESPONSES

Mr. James G. Kenna
November 5, 2003
Page 2

2. As mentioned in the EIS / EIR, the project application and its environmental document should be referred to Riverside and Imperial County Airport Land Use Commissions for a consistency determination. The airport management for Blythe, Desert Center, Chiricaco Summit, and Bermuda Dunes Airports should also be involved in the environmental process to ensure that the proposed activities are compatible with both existing and future planned airport facilities and operations. If a conflict is identified between the proposed project and the planned airport projects as indicated in Airport Layout / Master Plans, this inconsistency should be clearly identified and discussed in the EIS/EIR. **F-1**
 3. The Federal Air Regulation (FAR) Part 77, *Objects Affecting Navigable Airspace*, is the Federal Aviation Administration's (FAA) policy for conducting aeronautical studies to ensure the safety of aircraft and efficient utilization of navigable airspace by aircraft. This project may require the filing of a Notice of Proposed Construction or Alteration (Form 7460-1) pursuant to FAR Part 77. For further technical information and an electronic copy of the form, please refer to the FAA's Air Traffic and Airspace Management web page at <http://www.faa.gov/ats/ata/ata900/ocaaa.html>. **F-2**
 4. From a growth-inducing and cumulative impacts standpoint, the relationship between the alignment of the proposed power transmission lines and the siting of future power generation terminals should be clearly described. The Department is currently coordinating with the California Energy Commission to assess the potentially significant impacts of the Blythe Energy Project Phase II on the operations of the Blythe Airport. In another case, technical studies were required by the FAA to assess the potentially significant impacts of the High Desert Power Project on the operations of the Southern California International Airport. These studies were conducted using the Briggs' 1975 plume rise formulas implemented in the United States Environmental Protection Agency Industrial Sources Complex Short-Term Dispersion Model. Therefore, to prevent costly environmental analyses and to avoid potentially significant impacts on the safety of airport operations, in Section 2.6 of the EIS / EIR, dedicated to alternatives analysis, we recommend that the Bureau of Land Management coordinate with the California Energy Commission to study an alternative which would induce the least conflict between the safety of airport operations and future siting of power generation terminals. **F-3**
 5. In accordance with the California Environmental Quality Act, Public Resources Code Section 21096, the Department's California Airport Land Use Compatibility Handbook must be utilized as a resource in the preparation of environmental documents for projects within the boundaries of an airport land use compatibility plan, or if such a plan has not been adopted, within two nautical miles of an airport. For your reference, the Handbook is published on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/landuse.php>. **F-4**
- F-5**

"California improves mobility across California"

F-1 Consistency with applicable Airport Land Use Plans is fully evaluated in the Draft EIS /EIR in Section 3.7, Land Use. As part of final design and permitting, the commission will be contacted and provided with the needed information. The complete list of potential permits and approvals that maybe required for the project are listed on pages 1-7 through 1-10 of the Draft EIS/ EIR.

F-2 Page 3.7-25 of the Draft EIS / EIR states that the proposed project applicants would prepare a "Notice to Construct" for the FAA to obtain a "Determination of No Hazard to Navigation." Once the final alignment is selected by the CEQA and NEPA lead agencies, the permitting phase of the project would commence and all necessary permits and approvals would be acquired.

F-3 The Cumulative Impact Analysis in the Draft EIS/EIR does address proposed future power plants which could effect the same resources as the proposed Project, see Section 4.4. The potential growth inducing impacts of the proposed Project are discussed in Section 3.4.

F-4 Consistency with applicable Airport Land Use Plans is fully evaluated in the Draft EIS /EIR in Section 3.7, Land Use. Also, permits would be obtained from the Airport Land Use Commission and FAA. In addition, in response to a comment from the City of Blythe regarding potential conflicts with the Blythe Airport at the originally proposed location of this facility on the north side of Hobsonway, its location has been moved to the south side of Hobsonway to reduce the potential for these conflicts.

LETTER “F” RESPONSES

F-5 The referenced document was consulted during the course of preparation of the Draft EIS / EIR and its citation will be added to the references section of the document.

LETTER "F" RESPONSES

Mr. James G. Kenna
November 5, 2003
Page 3

These comments reflect the areas of concern to the Department's Division of Aeronautics. We advise you to contact our District 08 and 11 offices regarding surface transportation issues. } F-6

The need for compatible land uses around airports in California is both a local and a State issue. We strongly feel that the protection of airports from the encroachment of incompatible land uses is vital to the safety of airport operations, to the well being of communities surrounding aviation facilities, and to California's economic future. } F-7

We appreciate the opportunity to review and comment on this project. If you have any questions, please call me at (916) 654-5253.

Sincerely,



DAVID COHEN
Associate Environmental Planner

c: State Clearinghouse
Blythe Airport
Desert Center Airport
Chiriaco Summit Airport
Bermuda Dunes Airport
Riverside County ALUC
Imperial County ALUC
Ken Peterson, California Energy Commission

"Caltrans improves mobility across California"

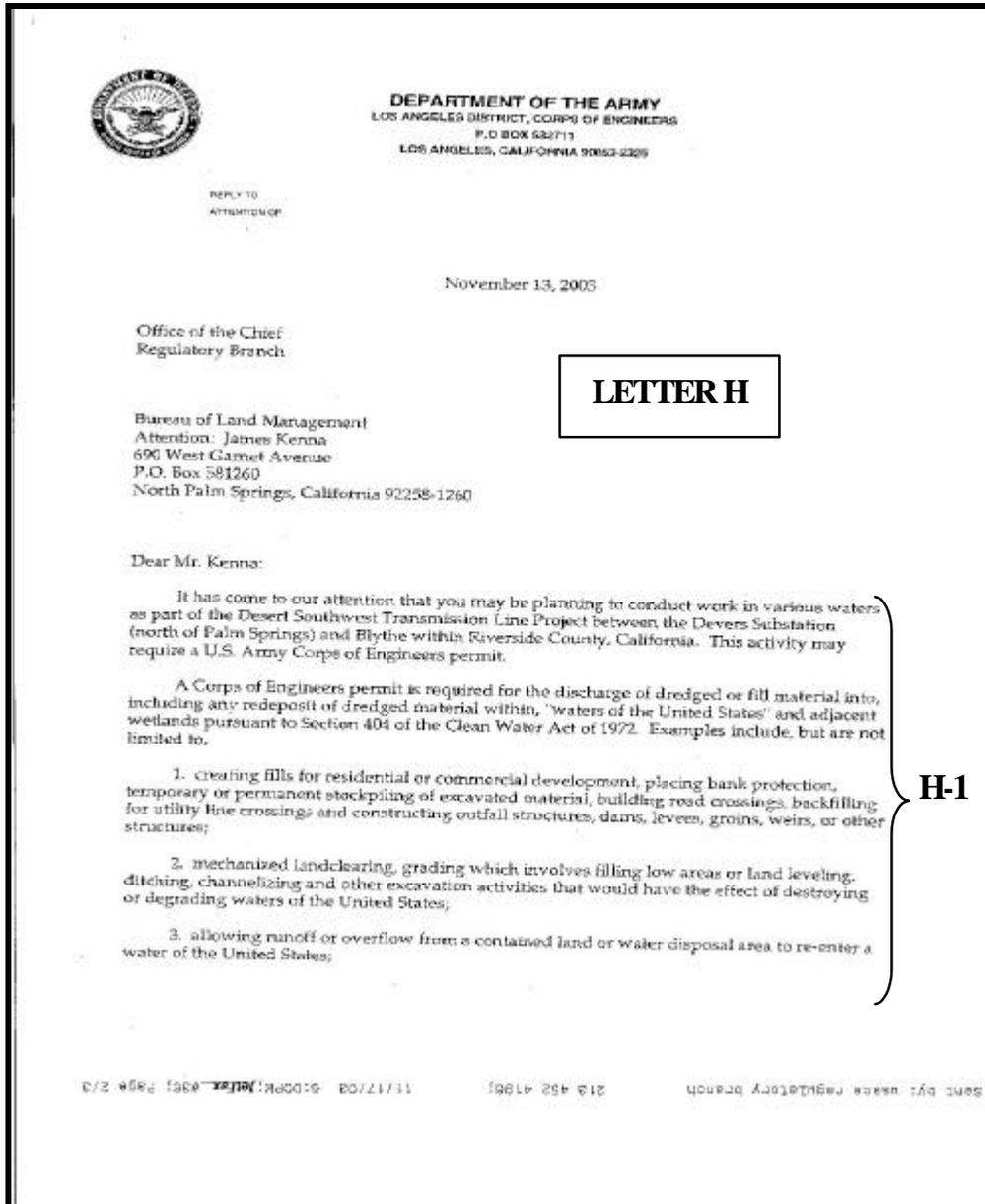
F-6 Copies of the 15 copies of the Draft EIS/EIR were sent to the State Clearinghouse for distribution to state agencies. A comment letter on the Draft EIS / EIR was received from the Department of Transportation District 11 office. Please refer to comment letter M.

F-7 Comment noted.

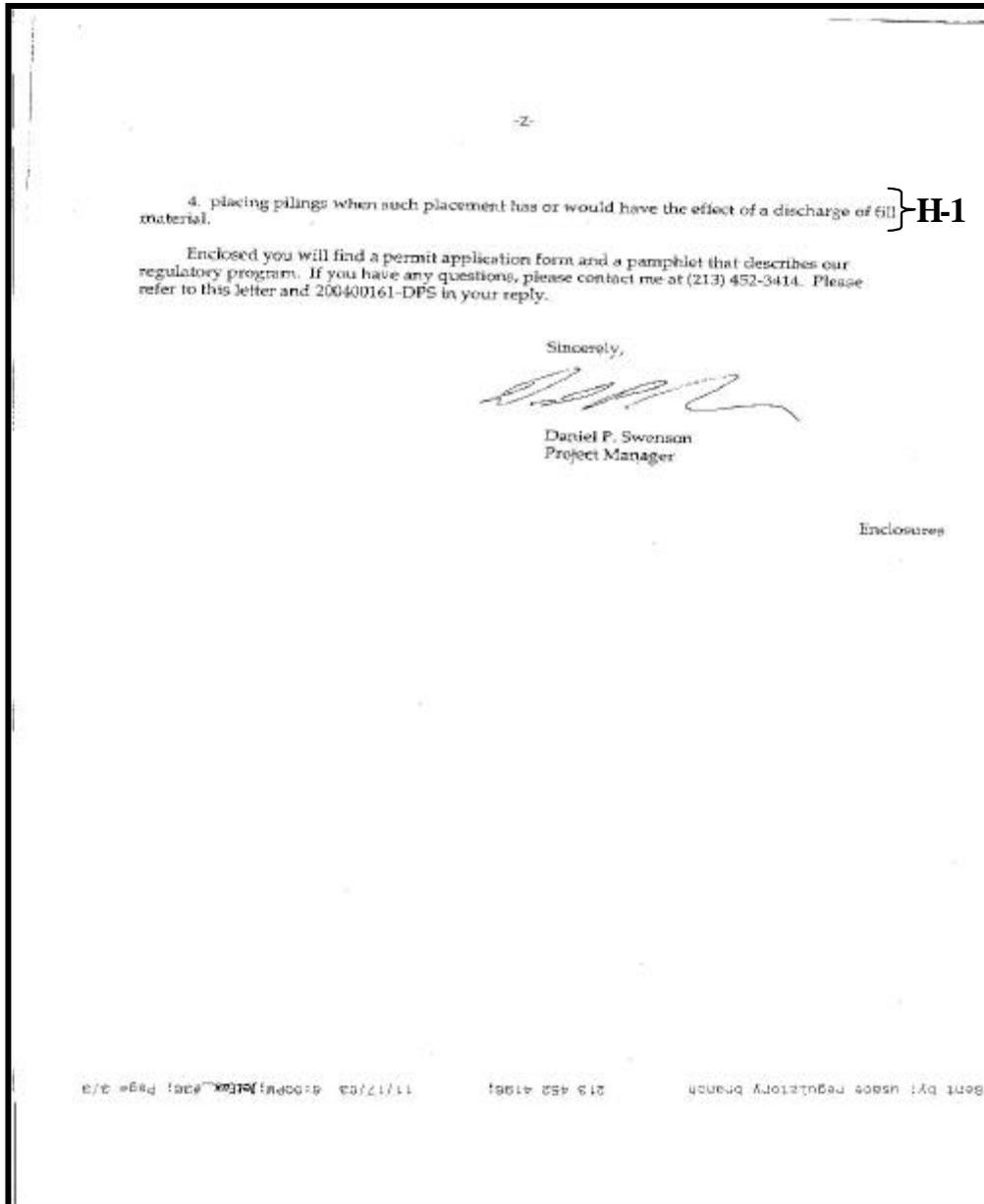
LETTER "H" RESPONSES

ARMY CORPS OF ENGINEERS

H-1 The complete list of potential permits and approvals that maybe required for the project are listed on pages 1-7 through 1-10 of the Draft EIS/ EIR. This list includes approvals from the U.S. Army Corps of Engineers. Once the final alignment is selected by the CEQA and NEPA lead agencies and the final design is developed, all necessary permits and approvals would be acquired.



LETTER "H" RESPONSES



LETTER "I" RESPONSES



LETTER I

DESERT SOUTHWEST TRANSMISSION LINE PROJECT
Draft Environmental Impact Statement/Environmental Impact Report
Comment/Mailing Address Form
www.ca.blm.gov/palmsprings

Date: 11-18-03

Comments, including names and street addresses of respondents will be available for public review at the BLM Palm Springs-South Coast Field Office on during regular business hours (7:30a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Would you like to be added to the list for future mailings concerning the Desert Southwest Transmission Line Project? YES NO

If yes, please provide a mailing address:

Name: CHARLES C. WILLIAMS
Affiliation (If applicable): IID RETIRED
Street Address: 714 SANDALWOOD DRIVE
City: EL CENTRO, CALIFORNIA State/Zip Code: 92243
Phone: (760) 354-1663 Fax: _____
Email: _____

Areas of Interest: ALTERNATIVE LINE ROUTES, LAND & WATER ENVIRONMENTAL CONCERNS, ANIMAL & PLANT CONCERNS } I-1

Comments: (Please mail to Bureau of Land Management, P.O. Box 581260, 690 West Garnet Avenue, Palm Springs, CA 92258)

INDIVIDUAL, CHARLES WILLIAMS

I-1 Alternatives to the proposed project are described in Section 2.0 of the Draft EIS / EIR. Land Use and Water Resources are discussed in Sections 3.7 and 3.4, respectively. Biological resources are discussed in Section 3.1 of the Draft EIS / EIR.

LETTER "J" RESPONSES




LETTER J

RECEIVED
BUREAU OF LAND MANAGEMENT
NOV 25 10 11 AM '12
PALMS-SCOTT COAST
RECREATION AREA

DESERT SOUTHWEST TRANSMISSION LINE PROJECT
Draft Environmental Impact Statement/Environmental Impact Report
Comment/Mailing Address Form
www.ca.blm.gov/palmsprings

Date: 11/21/12

Comments, including names and street addresses of respondents will be available for public review at the BLM Palm Springs-South Coast Field Office on during regular business hours (7:30a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Would you like to be added to the list for future mailings concerning the Desert Southwest Transmission Line Project? YES NO

If yes, please provide a mailing address:

Name: ERIC J. BOYD
 Affiliation (if applicable): SKY VALLEY CHAMBER & COMMUNITY CENTER
 Street Address: P.O. Box 63
 City: Desert Hot Springs State/Zip Code: CA - 92250
 Phone: _____ Fax: _____
 Email: _____
 Areas of Interest: _____

Comments: (Please mail to Bureau of Land Management, P.O. Box 581260, 690 West Garnet Avenue, Palm Springs, CA 92258)

As Residents of Sky Valley are concerned regarding the
Sky Valley Area of the Environmental Impacts that during the
upcoming 2012-2013 season we hope that all of the impact
studies in this area will be done and helping the valley
area of any resources that you are planning to do.

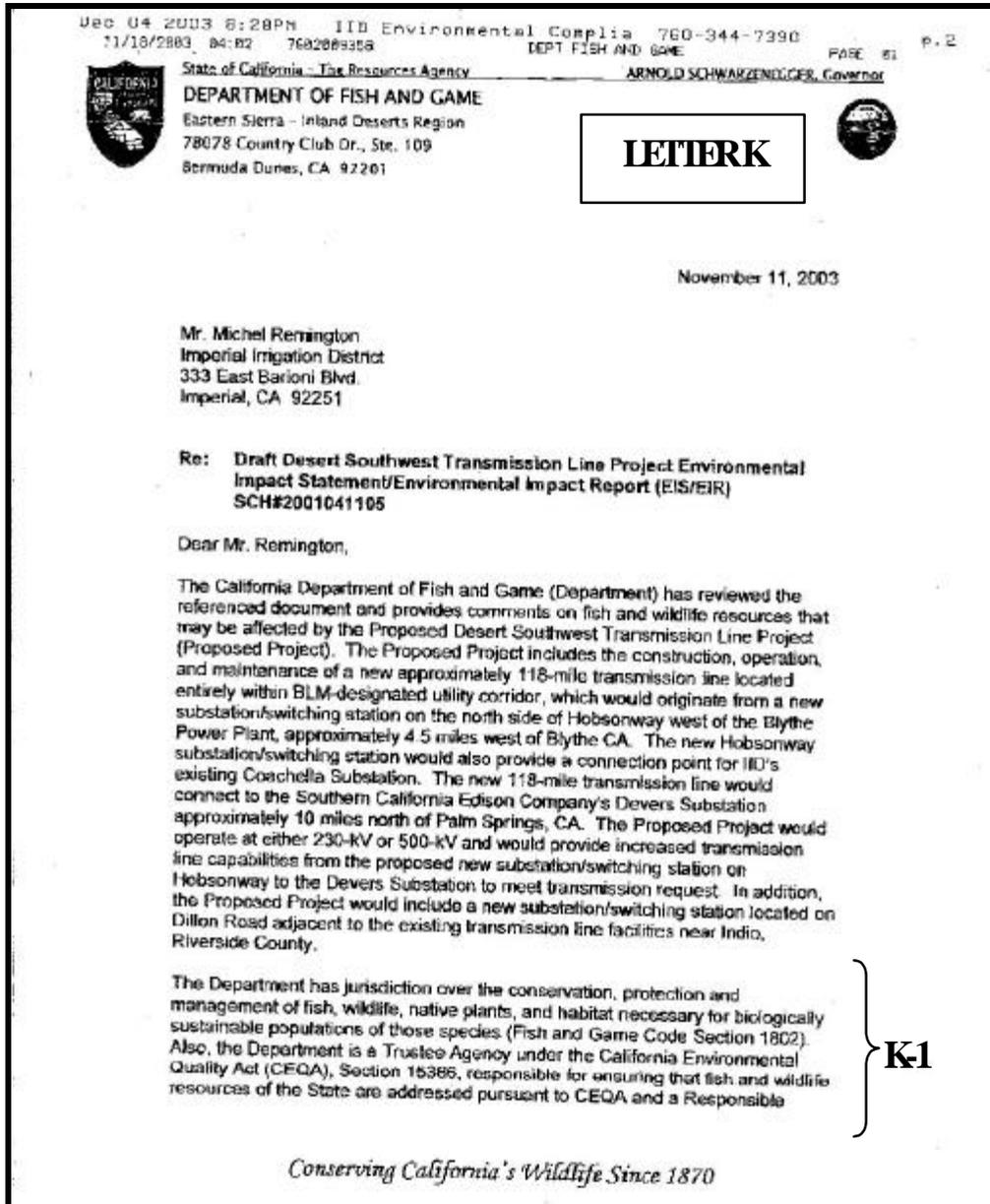
Eric J. Boyd
Eric J. Boyd

J-1

INDIVIDUAL, SKY VALLEY CHAMBER & COMMUNITY CENTER

J-1 Comment noted.

LETTER "K" RESPONSES



DEPARTMENT OF FISH AND GAME

K-1 Comment noted.

LETTER "K" RESPONSES

Mr. Michel Remington
Page 2 of 5

Agency under CEQA Section 15381. In these capacities, the Department provides the following comments on the Proposed Project.

SPECIFIC ISSUE COMMENTS

2.2 Preferred Alternative

The project description briefly mentions that the new Hobsonway substation/switching station would also provide a connection point for IID's existing Coachella substation, however, no further reference is made to this component of the project. Please provide a detailed description on how this component would be accomplished, and an effects analysis for this component of the Proposed Project.

2.4 Alternative B – Southern Route Alternative

At this time, it is not possible for the Department to adequately comment on Alternative B. Appendix E does not include a summary of the reconnaissance level habitat assessments and focused protocol special-status species surveys for Alternative B. In addition, if protocol focused surveys were conducted for species that would occur along alternative B during June 2002, the surveys for at least the California Black Rail would be inadequate, since the protocol states that surveys need to be conducted 3-times during March – May. In addition there is no adequate discussion of mitigation for other species that have the potential to be encountered along Alternative B including Gila woodpecker and glided flicker.

3.1.3.2.1 Vegetation Communities

This section differentiates between temporary and permanent ground disturbance. Please define, in term of effect (i.e. # of years), temporary and permanent ground disturbance. Desert ecosystems are slow to recover from disturbance; therefore, temporal losses should not be discounted when evaluating significant environmental impacts. The Department disagrees with the sentence in section 3.1.3.2.1 Vegetation Impact 4, that states "Although the Proposed Project would result in the loss or conversion of these vegetation communities, such disturbance is not considered significant due to large amount and general distribution of similar habitats throughout the project region." The Department feels that any disturbance is significant, and mitigation and/or restoration should be adequate to compensate for such disturbance.

As presented in Table 3.1-2, it is unclear if components c, d, and e for both the 230-kV and 500-kV transmission line will be constructed. The row titled "Total" accounts for impacts attributable to construction of the components needed to install both transmission lines. Please revise table so that disturbance areas clearly reflects that the Proposed Project involves either the construction of components needed for the 230-kV or 500-kV transmission line and not both.

K-1

K-2

K-3

K-4

K-5

K-6

K-2 Please note that the New Substation/Switching Station on Dillon Road would connect to IID's existing Coachella Substation (see Section 2.2.2.3, Substation/Switching Station Facilities). In addition, the potential impacts of the Substation/Switching Station Facilities are addressed in Sections 3.1 through 3.13.

K-3 Alternative B is not the preferred alternative. NEPA requires that the project and each alternative be analyzed at the same level of detail. Under CEQA, the alternatives analysis can be less detailed but must provide the public and involved agencies with a comparative basis for evaluating significant impacts. Once the final alignment is selected by the CEQA and NEPA lead agencies and the final design is developed, preconstruction clearance surveys would be conducted for the route and the results incorporated into the final Plan of Development. This will itemize in detail all agreed upon mitigation.

K-4 Temporary habitat disturbance is disturbance of those areas that would subsequently be available for revegetation and use by fauna, following construction. At a minimum, this would include soil crust disturbance and some vegetation crushing; and at the most it would include blading or other removal of soils and vegetation. In contrast, permanent disturbance is considered to be surfaces permanently removed from the habitat (e.g. tower footings). Because of the difficulty of passively or actively revegetating desert sites and the decades necessary to restore them to their pre-disturbance conditions, both temporary and permanent disturbance surface disturbances are considered equivalent where temporary disturbances result in loss of vegetation or identifiable soil disturbance.

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Footnote “c” for Table 3.1-2 identifies temporary disturbance as the area within which disturbance could occur during construction of the towers. While the entirety of these 300 by 300 foot areas would not be disturbed during construction, the entire area is assumed to be disturbed for the purposes of project description. Similarly, permanent losses are considered to include not only the sites of the cement footings, but the remaining habitat under the towers (i.e., between the footings) even though this could become usable habitat in the future.

K-5 The upland plant communities that occur in the areas where long-term impacts would occur are locally abundant in the project area and within the region. The area that would be affected is small. Furthermore, program mitigation measures will minimize impacts to the maximum extent practicable. Thus, long-term impacts to upland plant communities, while adverse, are not considered substantial and would not be considered biologically significant. An assessment of relative significance is not directly linked to the need for mitigation.

K-6 Only the 500 kV line would be built so only those project components associated with it would be constructed. Table 3.1-2 has been modified to reflect this.

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The Department believes that temporary impacts to sensitive vegetation communities, such as desert dry wash woodland, are significant. As noted earlier, desert ecosystems are slow to recover and implementation of the Reclamation Plan (Appendix F) alone will not mitigate to a level of less-than-significant. As such, the Department recommends that additional measures be included, such as restoration and/or preservation of offsite in-kind vegetation communities. In summary, the Department recommends that both permanent and temporary losses of sensitive vegetation communities be mitigated.

3.1.3.2.2 Wildlife Impacts

Wildlife Impact 1 Mitigation

Prior to release of this document, IID as the Lead Agency should have consulted with the Department, as the Trustee Agency, to develop the appropriate mitigation for wildlife species impacts. The CEQA document is a full disclosure document for the public. Developing the mitigation outside of this document is inappropriate.

Wildlife Impact 5 Mitigation

The Department recommends that the observed bird nesting season be changed to March 1 - September 30. In addition, the Department recommends that acceptable survey procedures be developed in consultation with the Department, and provided in a subsequent release of the document.

3.1.3.2.3 Special Status Species

Special-Status Species Impact 1 Mitigation:

A Plant Salvage Plan is not considered adequate mitigation for special-status species such as Coachella Valley milk-vetch and Hardwoods milk-vetch. The acreage disturbed should be replaced with known occupied habitat.

Special-Status Species Impact 2 Mitigation:

Any take of the desert tortoise requires a California Endangered Species Act (CESA) permit from the Department. It is inappropriate to assume that mitigation developed with the U.S. Fish and Wildlife Service (Service) will fully mitigate impacts to the desert tortoise under CESA. As requested in our letter on the Notice of Preparation, IID as the Lead Agency, should have consulted with the Department, as the Responsible Agency, early in the process, in addition to the Service prior to developing mitigation for this species. The mitigation currently provided may not be adequate for issuance of a CESA permit.

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K-7 An existing access road occurs over a majority of the proposed corridor. In addition, based on engineering constraints, transmission towers will not be placed in desert dry washes. Therefore, the removal of desert dry wash woodland habitat will be minimal. Further, the project plans to mitigate for all surface disturbances. This may be incorporated into compensation for desert tortoises and other species. In recognition of the value of all native habitats, reclamation will be completed per Appendix F of the EIS / EIR. The exact acreages will be determined during final design after the route is selected.

K-8 Mitigation was primarily developed using NECO Plan guidelines, of which the CDFG was a co-author. In addition, the Final EIS/EIR will include responses to agency input and comments.

K-9 The Final EIS/EIR has been changed to incorporate this period.

K-10 Harwood's milk-vetch and Coachella Valley milk-vetch are both federally designated species. The Biological Assessment addresses both direct and indirect affects and details required conservation measures.

K-11 Section 7 consultation will be undertaken with USFWS. Specific mitigation and conservation measures were developed using NECO plan standards, which were developed in conjunction with CDFG. Also, CDFG 2081 consistency determination will provide an additional review.

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Special-Status Species Impact 2 Mitigation:

The document is correct in stating that a CESA permit will be required from the Department for impacts to the Coachella Valley fringe-toed lizard. This mitigation should be developed and provided for public review in a subsequent release of the document. } **K-12**

Special-Status Species Impact 8 Mitigation:

Avoiding impacts to desert rosy boa by only working in day-light hours is appropriate avoidance measure, however additional mitigation measures are needed including surveying appropriate habitat prior to construction to ensure they are not present, and to avoid destroying rocky outcroppings that could provide habitat for desert rosy boa. } **K-13**

Special-Status Species Impact 7:

Impacts to Couch's spadefoot toad include the potential for premature excavation due to the artificial rain-like sounds that could be generated from nearby heavy equipment. Pre-construction surveys should be conducted to determine if toads are present. } **K-14**

The above comments regarding desert rosy boa and Couch's spadefoot toad include take avoidance measures that could be achieved with appropriately trained biological monitors. Table 2-4 lists such monitors, please include where and how monitors will be utilized during construction. } **K-15**

Special-Status Species Impact 9 Mitigation:

Please see our previous comments (Section 3.1.3.2.2 Wildlife Impacts - Wildlife Impact 5 Mitigation). } **K-16**

The Department recommends that the second bullet read as proposed on Page 3.1-63 in Section 3.1.3.2.2 Wildlife Impacts - Wildlife Impact 5 Mitigation of the Draft EIS/EIR, with the exception of the identified breeding bird season which we recommend be changed to March 1 - September 30. } **K-17**

APPENDIX F

The Reclamation Plan should include a monitoring and reporting component that should be provided to the Department. A list of cacti, shrubs and trees to be removed should be provided to the Department prior to construction, and a list of cacti, shrubs and trees that were re-planted after construction should also be provided. The plan should include measures to avoid trespass and OHV use on the temporary spur roads, this could be done by using vertical mulching at obvious access areas. } **K-18**

K-12 The completion of the Draft Riverside County HCP has provided a detailed suitable habitat map. Therefore, the Final EIS/EIR contains updated acreage impacts detailed and subsequent mitigation measures defined. Also, Section 7 consultation and the subsequent 2081 consistency determination will provide CDFG additional review.

K-13 The Final EIS/EIR contains additional detail specifying surveying of appropriate habitat and avoidance of rocky outcroppings, where feasible.

K-14 The Final EIS/EIR contains additional detail specifying surveying of appropriate habitat and reporting requirements for the Couch's spadefoot toad.

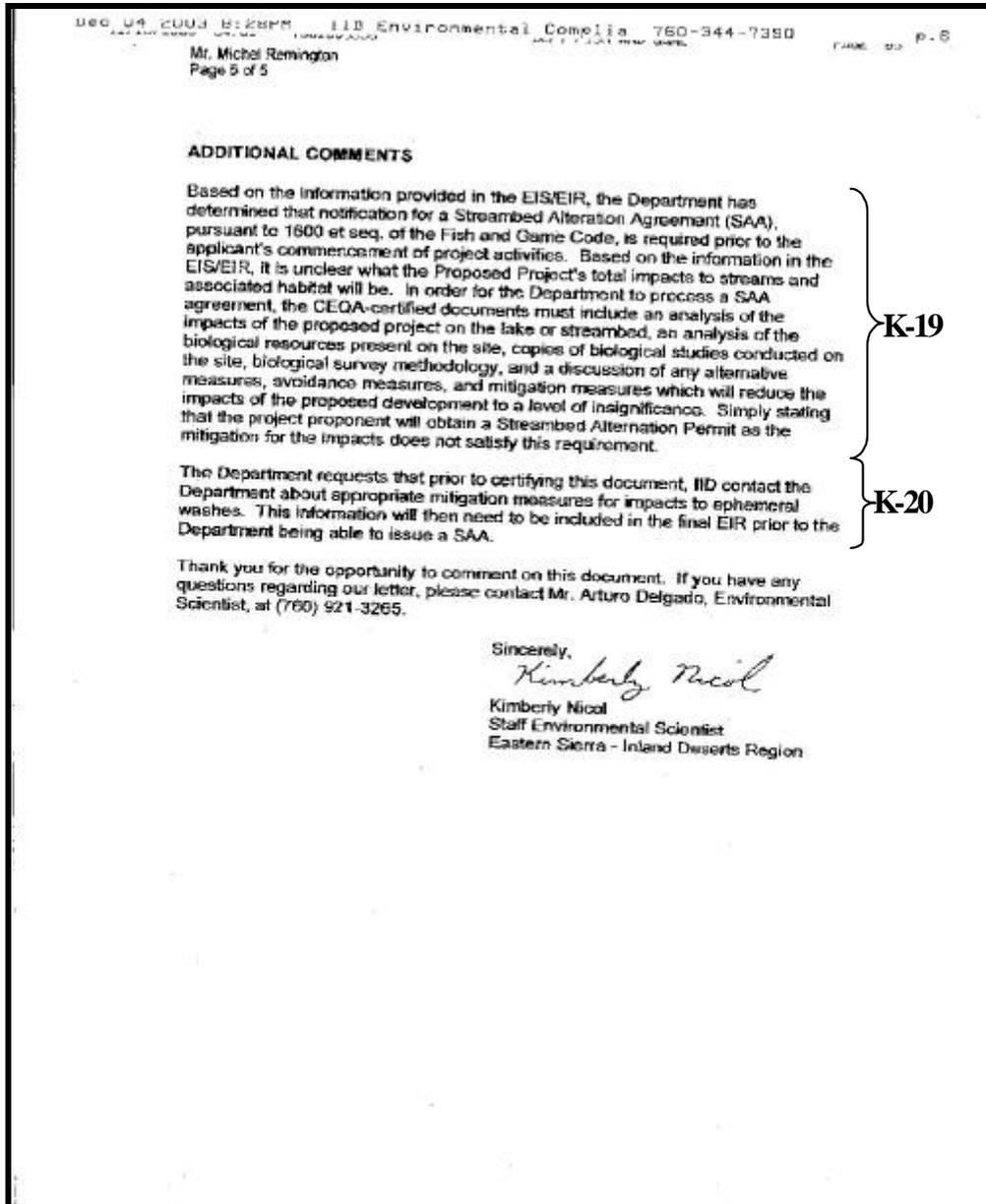
K-15 The Final EIS/EIR provides additional detail of construction monitors working on each segment of the Project.

K-16 No response required.

K-17 The Final EIS/EIR has been changed to incorporate this period.

K-18 The Desert Southwest Transmission Project has not proposed a salvage plan. The detailed reclamation plan will be prepared and submitted for review after final design is completed and prior to the commencement of construction.

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K-19 The Final EIS/EIR has been changed to detail designated USGS 7.5 minute quadrangle map blue line intermittent streams (mostly unnamed) and wide washes that may be traversed by the transmission line. Upon final design and development of the Plan of Development, consideration of avoidance and minimization of effects on blue line intermittent streams and wide washes will be analyzed in accordance with Section 404 and 401 of the Clean Water Act and Section 1602 – Streambed Alteration Agreement. However, based upon the span widths for a 500 kV transmission project and standard design practices for transmission projects to keep structures out of floodplains and drainages, it is highly unlikely that any structures would encroach upon or be within an ordinary high water mark of streams, drainages, or ephemeral washes.

K-20 Please see Response to Comment K-19 above.