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California Energy Commission
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California Energy Commission
Dockets Unit, MS-4
Docket No.11-AFC-04
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Palo Verde Irrigation District's comments on Rio Mesa Solar Electric Generating Facility Preliminary Staff Assessment Part B issued Oct. 2012. (11-AFC-04)

Dear Energy Commission:

This letter supplements our November 1, 2012 comments provided on the Preliminary Staff Assessment (PSA) Part B for the Rio Mesa Solar Electric Generating Facility issued in October 2012. In our original letter regarding PSA Part B, we corrected factual information regarding the location and identification of various portions of the Palo Verde Irrigation District (PVID) facilities. In this letter, we respond to the CEC staff's discussion of the PVID as a potentially significant historical district eligible for listing in either the California Register of Historical Resources or the National Register of Historical Places.

PVID disagrees that its district may be eligible for listing as a historic resource under either state or federal law, and is pleased to provide additional information here to aid in staff's assessment. The facts simply do not support a determination of eligibility. While PVID agrees that the district allowed for the agricultural development of the valley and was and continues to be important to the local farmers, it is by no means unique, and it clearly no longer retains integrity from its original period from 1877-1904, when Mr. Blythe started development, 1904 to 1925 when Valley developed under Mutual Water Company, 1925 to 1945 when PVID was created and developed system as it generally exists today, 1945 to 1957 after World War 2 to construction of new diversion dam, and 1957 to present when PVID deepened its drainage system.

There is insufficient information upon which to find that PVID qualifies under any of the criteria set forth in Public Resources Code Section 5024.1 (or the National Register of Historic Places criteria). The PSA indicates that staff is considering a period of significance that extends from 1877 to the present; however, there is nothing unique or exceptional about PVID that would distinguish it from the other irrigation districts up and down the Colorado River. Specifically, there are at least 8 other large agencies on the California side of the Colorado River that were created that have allowed communities and farming to develop in their areas in the same way that PVID has done for its service area. These agencies include Fort Mojave Indian Reservation, Chemehuevi Indian Reservation, The Metropolitan Water District of Southern California, Colorado River Indian Tribes in California, Yuma Project in

California—Indian and Bard agencies, Imperial Irrigation District, Coachella Valley Water District, and smaller water users . Each of these agencies have a system of canals, ditches, levees, and diversion works and, like PVID, may have facilities in locations that have not changed significantly over time, but each has pursued aggressive modernization efforts over the years. There are also seven dams on the Lower Colorado River below Hoover Dam, and contrary, to the statements in the PSA Part B, there is nothing to suggest that the PVID dam is particularly unique.

Additionally, there is no information upon which to find that PVID retains integrity. PVID's water rights stem from historical grants of Colorado River water granted to Thomas H. Blythe in 1877 and later. Mr. Blythe funded development in the area until his death in 1883. The Blythe Estate fell into disrepair and was damaged by annual floods. In 1904, developers bought the Blythe Estate and began developing the Valley again. As noted in the PSA Part B, a devastating flood in 1905 destroyed much of the original system, and another flood in 1922 again devastated the new system. There is no justification for integrity based on the potential original period of significance from 1877 as proposed by staff. PVID itself was formed by a Special Act of the California Legislature in 1923 by combining three agencies---Palo Verde Mutual Water Company, Palo Verde Joint Levee District, and Palo Verde Drainage District. Between 1923 and 1945, the canal and drainage system was entirely renovated. Between 1945 and 1957, low water on the river created diversion problems for PVID. Between 1957 and the 1980's, after PVID and federal government constructed its diversion dam in 1957, and the Bureau of Reclamation did channelizing work on the River, PVID took advantage of the situation to lower the water level in its drains and deepen depth to groundwater from an average of 5 feet to an average of 10 feet. Between the 1980's and now, PVID has been undergoing constant modernization efforts. In 2007, the last wooden check was replaced. Between 1965 and now, PVID has reduced the miles of canal from 295.85 miles down to 244.23 miles which included length of concrete lined canals going from 0 to 56.07 miles. PVID is constantly upgrading and modernizing and maintaining its facilities. The only portions of structures containing old material are the pipes under County roads which will be replaced when they fail.

PVID notes that the PSA Part B compares PVID to Turlock Irrigation District and the Reclamation District 1000, both of which have been determined eligible historic resources in other contexts. We note, however, that each of those districts were significant for their original periods - 1893-1920 for the Turlock Irrigation District and 1911-38 for Reclamation District 1000. The PVID does not have remaining integrity of feeling, setting, design, materials, workmanship, location or association from its original period, and there is nothing unique or exceptional about the district that would justify its eligibility to the present day.

With respect to the individual facilities identified as potentially impacted by the Rio Mesa project, PVID provides additional information in the shaded column added to the PSA Part B Table 20 for staff's information, showing that those facilities no longer retain their integrity. The Bradshaw Trail is a distorted ' historical' road that changed location over time. In 1903, the Bradshaw Trail (Old Butterfield Stage Road) when it dropped off into the valley did not go straight east as indicated in the PSA Part B text. The old stage road went northeasterly crossing Ludy Blvd at 26th Avenue. As roads developed in the valley, the road became named the Niland-Rannells road. In 1927, a wooden bridge was placed over

C03 Canal providing access to Rannells townsite. This wooden bridge was replaced in 1949 with a concrete pipe siphon as it exists today.

Cultural Resources Table 20
Palo Verde Irrigation District Resources
Within the Rio Mesa SEGF Built-Environment PAA

Resource Identifier	Resource Description	Relative Location	Applicant Integrity & Significance Evaluations	**PVID Additional Information**
RMS-ML-009 Hodges Drain	Unlined drainage ditch, *circa* 1952-1965.	Intersects Bradshaw Trail and 34th Ave, inside built-environment PAA	Not eligible: Lacks integrity of setting, feeling, and association due to introduction of non-historic elements.	**PVID concurs with Applicant Evaluation. Specifically, non-historic elements are siphon under 30th Avenue replaced in 1971, under 34th Avenue in 1965.**
RMS-ML-010 C-03 Canal	Unlined and lined canal, prior to 1923.	Intersects 34th Avenue, outside built-environment PAA	Not eligible: Lacks integrity of materials due to the introduction of non-historic elements.	**PVID concurs with Applicant Evaluation. Specifically, non-historic elements: C03 Canal is not lined. Existing siphon at 30th Avenue installed in 1949, at 34th Avenue in 1946. Both commercially bought pipe.**
RMS-ML-011 Palo Verde Drain	Unlined drain, prior to 1949.	Intersects Bradshaw Trail, outside built-environment PAA	Not eligible: Lacks integrity of setting, feeling, and association due to introduction of non-historic elements.	**PVID concurs with Applicant Evaluation. Specifically, non-historic elements The 1870's Bradshaw trail did not cross this drain.**
RMS-ML-012 Estes Drain	Unlined drain, *circa* 1949-1965.	Intersects Bradshaw Trail and SR 78, outside built-environment PAA	Not eligible: Lacks integrity of setting, feeling, and association due to the introduction of non-historic elements. Drain appears unaltered.	**PVID concurs with Applicant Evaluation, 1870's Bradshaw Trail and Highway 78 do not cross this drain.**

Resource Identifier	Resource Description	Relative Location	Applicant Integrity & Significance Evaluations	**PVID Additional Information**
RMS-ML-013 Private Drain No. 1	Unlined drain, *circa* 1920s.	Near intersection of Bradshaw Trail and SR 78, outside built-environment PAA	Not eligible: Lacks integrity of design, setting, materials, feeling, and association.	**PVID concurs with Applicant Evaluation. As noted in PVID's Nov. 1, 2012 Comment Letter on PSA Part B, this is not a drain, it is an unlined farmer's irrigation ditch delivery installed 1953.**

Based on the information and records held by PVID, there is no basis on which to find integrity of the district.

Additionally, staff should be aware that various projects have considered impacts to the PVID system in recent years, including the City of Blythe's General Plan and the Devers-Palo Verde No. 1 & 2 Transmission Line Projects, to name a few. The City included 43 properties as historic, none of the 43 include PVID. In the transmission project, BLM considered a route that would have crossed a substantial portion of the PVID with access roads and transmission lines, and the EIS did not find that the PVID was a historic resource. No recent projects have determined that PVID was eligible as a historic district under the California Register of Historical Resources. Further, the PVID-Metropolitan Water District Land Management Project and regional Colorado River MSCP both considered PVID and the surrounding areas and neither of those analyses determined that PVID was an eligible district for the National Register of Historic Places.

In sum, we hope we have been of assistance in clearing up any questions you may have regarding PVID, and trust that this information is sufficient to assist staff in finding that the PVID is not an eligible historic resource.

If you have any questions regarding these comments, please call.

Sincerely,

Ed Smith
Manager