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IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

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

JURG HEUBERGER, AICP, CEP, CBO
 PLANNING & DEVELOPMENT SERVICES DIRECTOR

DRAFT RESPONSE LETTER

October 23, 2006

Mary Dyas, Project Manager
 California Energy Commission
 1516 Ninth Street MS # 15
 Sacramento, CA 95814-5512

DOCKET 06-SPPE-2
DATE OCT 23 2006
RECD. OCT 30 2006

SUBJECT: Response to California Energy Commission's Draft Initial Study/EI Centro Unit 3 Repower Project/06-SPPE-2

Dear Ms. Dyas:

The Imperial County Planning and Development Services Department has received on October 6, 2006, the proposed Small Power Plant Exemption for the Imperial Irrigation District's existing steam generating unit in El Centro. The repower project will increase the existing Unit 3 generating capacity by 84 megawatts (MW) from 44 MW's to 128 MW's.

The cover letter to the California Energy Commission's "Notice" provides that the deadline for written comments on the above SPPE is "October 23, 2006". The following are comments on the proposed Draft Initial Study:

1) Page 2-1 The Initial Study's Project Description states, "**General Plan Designation**, "Imperial County General Plan Designation: General Agriculture (A-2) and Manufacturing Light Industrial (M-1)..." and states under "**Zoning**", that "...a general plan amendment and conditional use permit from the Imperial Planning/Building Department prior to the construction of the proposed project..." is required and the author of this section may be referring to the IID's Niland Gas Turbine project.

Please be advised that the El Centro Steam Plant is located entirely within the City of El Centro and is designated within the County's General Plan, Land Use Element and on the Land Use Plan Map as "Urban". The County's Zoning Map 1, has the surrounding zone of "A-2-U (General Agriculture/Urban)" and "A-2 (General Agriculture)" on the northern and eastern sides of the El Centro Steam Plant.

Therefore, a "general plan amendment and conditional use permit from the Imperial County Planning/Building Department" would not be required for the repower project. However, it would appear that permitting would need to be done by the City of El Centro. A global search should be made and "Planning/Building Department" be changed to "Planning and Development Services Department" in the Final Initial Study.

Mary Dyes
Project Manager
California Energy Commission
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2) Page 2-2 Are there any studies that indicate that the proposed non-hazardous deep water injection system, being pumped approximately 2,000 feet below the ground, would or could adversely impact the topography, including future potential site or regional uplift and/or subsidence.

3) Page 2-4, Figure 1, Project Location Map, should be revised to indicate that the project site is within the El Centro city limits.

4) Page 6-4 The "Alternative Generating Technologies" section states that "...Biomass and fossil fuels other than natural gas cannot meet air quality limitations. Renewables require more physical area and are not always available when peaking power is needed..." The County of Imperial has a number of "biomass" facilities, e.g. wood chip and manure fired power plants, which have met applicable air quality standards approved by the Imperial County Air Pollution Control District.

The Final Initial Study should revise the above statements relating to "biomass" plants not meeting "air quality limitations".

5) Page 8-2 Within the first paragraph it states, "...Imperial County Environmental Health Department, Department of Toxic Substances Control is the local administering agency to determine the requirement for an RMP..." Please revise this statement because the "local administering agency" for RMP preparation, review and approval in Imperial County is "Alan Hsu, Supervising Hazardous Substance Scientist I, Certified Unified Program Agency, Imperial Hazardous Materials/Waste Unit, 301 Heber Avenue, Calexico, CA 92231".

6) Page 9-2 It states that the steam plant's project site is located within the "Imperial County" sphere of influence. Please correct in your Final Initial Study to read that it is within the "City of El Centro" sphere of influence.

7) Page 9-6 Under the Agricultural Resources, paragraph, (B) it states again that the Imperial County land use designations to the east and north of project site as "...General Manufacturing, General Agriculture A2, and Manufacturing Light Industrial..." Again, as previously mentioned, revise the text of the Final Initial Study to show that the project site is designated as "Urban" and the surrounding lands on the north and east are designated as "Urban" and "Agriculture" and are zoned "A-2-U (General Agriculture/Urban)" and "A-2 (General Agriculture)".

8) Page 10-4 Under the heading "Imperial County Land Use Ordinance", it states that "...For the El Centro Unit 3 Repower Project, which would be built on land zoned Manufacturing Light Industrial (IID 2006a)..." Please do a global check and change Final Initial Study to show that the City of El Centro's zone on this site is "Limited Use (LU)" (reference page 2-1, Project Description).

Mary Dyas
Project Manager
California Energy Commission
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The County looks forward to working with the California Energy Commission, the City of El Centro and affected agencies on the repower project.

Should you have any questions, please feel free to contact me at (760) 482-4236, extension 4310 or by e-mail at jurgheuberger@imperialcounty.net.

Sincerely,



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

cc: Ruben Duran, City Manager, City of El Centro
Oliver Alvarado, City Planning Director
Norma Villancana, City Planner
Robertta Burns, County Executive Officer
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Mark Johnston, County EHS/Health Department
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Jim Mjnnlck, County Planning Division Manager
California Energy Commission Correspondence File
File: 10.100, 10.105, 10.124, 10.130, 10.133, 10.134, 10.142, 10.258, 80.026

JH/cm/SJ/City of El Centro/Response to ECCEC Draft Initial Study

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA**

**APPLICATION FOR A SMALL POWER
PLANT EXEMPTION
FOR THE EL CENTRO UNIT 3
REPOWER PROJECT**

Docket No. 06-SPPE-02
PROOF OF SERVICE

***Established 6/29/06**

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 04-AFC-01
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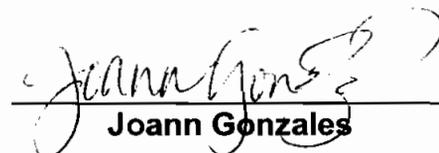
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DECLARATION OF SERVICE

I, Joann Gonzales, declare that on October 30, 2006, I deposited copies of the attached: EI CENTRO UNIT 3 REPOWER PROJECT NOTICE OF WORKSHOP (6-SPPE2) Imperial County Planning & Development Services comments on Response to California Energy Commission's Draft Initial Study/EI Centro Unit 3 Repower Project/06-SPPE-2

I Joann Gonzales; declare under penalty of perjury that the foregoing is true and correct.



Joann Gonzales