

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

November 28, 2005

Via Facsimile

Office of Electricity Delivery and Energy Reliability
 Room 8H-033
 U.S. Department of Energy
 1000 Independence Avenue, S.W.
 Washington, DC 20385

Dear Sir or Madam:

Notice of Intent to
Prepare a Programmatic Environmental Impact Statement for the West-wide Energy Corridor

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Intent (Notice) to Prepare a Programmatic Environmental Impact Statement (PEIS) for the West-wide Energy Corridor (Project). The Energy Policy Act of 2005 (the Act), Public Law 109-58 (H.R. 6), enacted August 8, 2005, directs the Secretaries of Agriculture, Commerce, Defense, Energy, and the Interior (the Agencies) to designate under their respective authorities corridors on Federal land in the 11 Western States for oil, gas and hydrogen pipelines and electricity transmission and distribution facilities (energy corridors). The Agencies intend to prepare a PEIS entitled "Designation of Energy Corridors on Federal Land in the 11 Western States" (DOE/EIS-0386) to address the environmental impacts from the proposed action and the range of reasonable alternatives. This letter contains Metropolitan's response to the Notice as a potentially affected agency.

Metropolitan provides half of the water used by the 18 million residents of the six-county southern California coastal plain. The infrastructure to supply this critical resource includes Metropolitan owned aqueducts, pipelines, tunnels, reservoirs, treatment plants, electrical transmission lines and other facilities located in the California counties of Los Angeles, Orange, San Bernardino, Riverside, and San Diego, and Clark County, Nevada. Metropolitan also relies on water delivered through the State Water Project operated by the California Department of Water Resources (CDWR). The State Water Project transports water from Lake Oroville in northern California to water agencies located throughout California.

The Notice and attached maps do not provide specific locations or routes for proposed utility corridors; without this information, Metropolitan cannot determine potential impacts to its or CDWR's facilities. Therefore, our comments at this time will be of a general nature and will focus on Metropolitan-owned facilities.

Metropolitan owns and operates the 242-mile Colorado River Aqueduct (CRA) and associated features. Most of the CRA is located in the rural, desert regions of San Bernardino and Riverside

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counties. The CRA consists of tunnels, open canals and buried pipelines. The CRA also includes large electrical pumping plants, above and below ground reservoirs and aquifers, access and patrol roads, communication facilities, and residential housing sites. To support the electrical demands of the CRA, Metropolitan owns and operates over 300 miles of 230-kV transmission lines located in Clark County, Nevada and San Bernardino and Riverside Counties.

Locating utility corridors near or across CRA facilities could have a negative impact on our operations. Construction activities could damage or limit access to our facilities, dust or spills at construction sites could impact water quality or Metropolitan employees and their families, changing the runoff patterns could lead to overtopping or washing out portions of the CRA, utility corridor activities could impact local plants, animals and habitat in such a way as to impose more restrictions on Metropolitan's operations, and leaks or releases from oil or fuel pipelines could contaminate water in our underground storage projects. Such negative impacts pose significant operating risks.

Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system. Metropolitan requests that the Draft PEIS note that neither private nor public entities have any entitlements to build over our fee-owned rights-of-way or properties. Additionally, Metropolitan requests that you consider our facilities and fee-owned or permanent easement rights-of-way in your planning and in the Draft PEIS, and avoid potential impacts that may occur due to implementation of the Project. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of any projects where they could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564.

While most potential impacts to Metropolitan's facilities are presumed likely to occur in the rural areas noted above, the possibility exists there could be impacts to facilities located in the urbanized areas of southern California. Metropolitan has an extensive water infrastructure throughout Los Angeles, Orange, and the western portions of Riverside, San Bernardino, and San Diego Counties. The impacts noted previously could also occur here. Metropolitan requests copies of future environmental documentation on this Project.

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We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,



Laura J. Simonak
Manager, Environmental Planning Team

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