



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

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Building Department

JUL 22 2019

CITY OF DESERT HOT SPRINGS

July 19, 2019

VIA EMAIL AND USPS

Mr. Scott Taschner
City of Desert Hot Springs, Community Development Department
65950 Pierson Boulevard
Desert Hot Springs, California 92250

Dear Mr. Taschner:

Draft Supplement to the Revised Commercial WECS 20 Permit EIR
for the Desert Hot Springs Wind Energy Repowering Project, SCH#2005101120

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Supplemental EIR for the Desert Hot Springs Wind Energy Repowering Project (SCH #2005101120). The review period ended July 1, 2019. Metropolitan appreciates the opportunity to have comments entered into the record for the Planning Commission to consider, and if possible, the project proponent through the CEQA process.

The proposed project would decommission 69 existing commercial wind turbines and ancillary equipment, and install 4 new commercial wind turbines with a maximum height of 499 feet above ground level on 161.61 acres of mountainous terrain located northerly of the unincorporated community of Painted Hills, westerly of State Highway Route 62, northerly of Avenue 16, and easterly of Windhaven Road. Each turbine would have a generating capacity between 2.0 megawatts (MW) and 4.2 MW. A laydown yard, new temporary and permanent internal roads, a temporary and one new permanent meteorological tower, each up to approximately 309 feet tall, and connection of 12-kilovolt (kV) electrical collection lines are also anticipated. Metropolitan's response to the Transmittal Notice as a potentially affected public agency.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving approximately 19 million people in portions of six counties in southern California. One of Metropolitan's major supplies is Colorado River water conveyed via Metropolitan's Colorado River Aqueduct (CRA). Metropolitan holds a contract with the Bureau of Reclamation for water service from the Colorado River. The CRA consists of tunnels, open canals and buried pipelines. CRA-related facilities also include reservoirs, an electrical transmission system, access and patrol roads, communication facilities, and residential housing sites. The CRA, which can deliver over 1.2 million acre-feet of water annually to the Southern California coastal plain, extends 242 miles from the Colorado River, through the Mojave Desert to Lake Mathews. Metropolitan has five pumping plants located along the CRA.

Mr. Scott Taschner

Page 2

July 19, 2019

Metropolitan's ownership and operation of the CRA is vital to its mission to provide Metropolitan's 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan is concerned with the potential impacts to its fee property and CRA pipeline from the resulting delivery and the locations of new commercial wind turbines and removal of 69 existing wind turbines. From the project description, it appears that the project will cross and come in close contact with Metropolitan's CRA and related rights-of-way. Two lease agreements exist for ingress and egress to cross the CRA between Sta. 9590+00 to 9620+00, APNs 668-020-002 and 668-050-016 (R.L. 666) and CRA between Sta. 9665+00 to 9665+30, APN 516-030-010 (R.L. 659).

Per the terms of the existing lease agreement, ingress and egress across the CRA are subject to load restrictions. If the project proponent plans to use any equipment or engage in any activity on the above referenced property which will impose loads greater than AASHTO H-20 for any reasons, including non-routine maintenance or removal and replacement of wind turbine generators, the project proponent shall submit the specifications of such equipment and associated additional pipeline protections for review and written approval by Metropolitan at least twenty working days prior to its use. In addition, if the project proponent intends to perform non-routine maintenance on their wind based electrical generation facilities, the project proponent shall call Metropolitan's Operations Control Center at telephone (626) 844-5610 three working days (Monday through Thursday) prior to entering Property unless an emergency requires immediate action that prevents the project proponent from providing such three days notice and notify the DVL Team Manager, telephone (714) 330-7352 about the activities and on-site schedule.

Please note that Metropolitan does not allow any structures within its fee property or easement. Additionally, Metropolitan requires a minimum setback for all buildings and structures including the wind turbines of at least 500 feet from the edge of Metropolitan's rights-of-way. Development associated with the proposed project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities and properties at all times in order to repair and maintain its system.

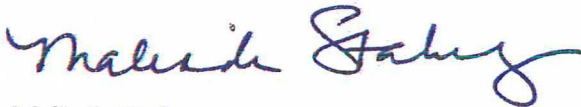
Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan's facilities, easements and properties, we have enclosed a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that all submitted plans must clearly identify Metropolitan's facilities and rights-of-way. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, Metropolitan requires that detailed design plans

Mr. Scott Taschner
Page 3
July 19, 2019

for any activities within the vicinity of our facilities, fee property or rights-of way be submitted prior to construction for review and written approval. Approval of the proposed project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for the proposed project.

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact Malinda Stalvey at (213) 217-5545.

Very truly yours,



Malinda Stalvey
Interim Team Manager, Environmental Planning Section

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SharePoint/Riverside County - Wind Energy Repowering Project_Supplemental EIR

Enclosures:

- (1) Location Map
- (2) RL 659
- (3) RL 666
- (4) Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

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