PALO VERDE IRRIGATION DISTRICT

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DOCKET
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DATE MAY 27 2005
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May 27, 2005

Mr. Roger E. Johnson
Siting and Compliance Office Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments on Final Staff Assessment Blythe Energy Project Phase II (02-AFC-1)

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Final Staff Assessment Report for the Blythe Energy Project Phase II (02-AFC-1) released May 4th, 2005. The following comments are provided, not only for the specific pages referenced but also for where it is appropriate throughout the Report:

1] All pages remarking on Palo Verde Irrigation District's (PVID) water right issue: PVID has the right to provide water for beneficial uses to 16,000 acres on the mesa under our apportioned Priority #3 and another 16,000 acres under Priority #6 in our 1931 Agreement with the State of California and our 1933 Contract with the U. S. Bureau of Reclamation (USBR). PVID's water right for the mesa has been in various contracts since then. Our water right is for "diversion less return" only. There is no acre foot limit. There is no acre foot per acre limit. The only condition is that the water must be beneficially used. There is no water right for water not used. What water we do not use is made available to lower priority users. Water used for power production elsewhere in the state must meet the same beneficial use requirement so the fact that power production is a beneficial use has been established. For both plants, 6,000 acre feet per year would result in Rannells Drain having a reduced average daily flow of 8.3 cubic feet per second at Hobsonway. Due to operational spillage, adjacent field irrigation, phreatophyte water use, evaporation, storm runoff water entering the drain, the reduction in drain flow would be hard to see in the measured return data at the end of the year.

2] All pages discussing Water Conservation Offset Program (WCOP): Palo Verde Irrigation District (PVID) is not taking a position on the WCOP. However, if Blythe Energy II does go forward with a WCOP, PVID does not support permanent fallowing of fields. PVID would accept the rotation of fallowed fields; fields could be fallowed up to a maximum of 5 years with a qualifier that any field in the WCOP must maintain a water use history of being farmed at least two years before being fallowed again. The WCOP is not a mitigation item, it is a way of trading water use from farmland to power generation so the net use for PVID is unchanged; i.e. that the Colorado River system is not receiving an increased demand in water use.

3] Pages 1-2, 3-6, 4.3-15, 4.5-17, 4.5-22, 4.8-6 regarding the consumptive use value of 4.2 acre feet per acre: The requirements in **LAND-3** on page 4.5-21 and **SOCIO-2** on page 4.8-13, eliminate low water use rate crops from the proposed WCOP. The consumptive use value should be higher than 4.2 acft/ac. PVID does not support the 4.2 acft/ac value. Our historical valley use rate ranges between 4.8 and 5.0 acft/ac and may be higher depending on the economy and the amount of second cropping done. Due to the high salinity of our irrigation water, crop water use rates should be higher than in other areas with better water quality.

4] All pages discussing groundwater use from wells or from Rannells Drain: PVID considers water pumped from Rannells Drain or water pumped by well from groundwater to be classified as the same water. It just takes longer for drain water to flow naturally to the well. Either way, the water consumed by the mesa plant may be classified as "Colorado River water". If so, then it would be used under PVID's water right and PVID's Contract with the Bureau of Reclamation.

5] Mid page 1-4, mid page 1-7, 4.9-7, 4.9-11, 4.9-12, 4.9-16 #1, regarding natural sources of groundwater contamination: The issue of pumping groundwater from under the mesa is distorted. Any of the wells on the mesa pumping groundwater whose cone of depression has reached the valley's groundwater, are pumping groundwater that is being recharged by irrigation water on the mesa, by irrigation water in the valley, and by drain water. The rest of the recharge is from groundwater flowing easterly from the mountains toward the valley. In the late 1970's and thru the mid 1980's, a lot of poor quality groundwater was pumped from under the mesa. When those wells quit pumping in the mid 1980's, recharge waters from the mountains and valley mixed resulting in well water having better quality than the water that had been pumped. The recharged mixed water is less dense than the deeper poorer quality water so it stays on top of the poorer quality water. This mixed water is now being proposed to be pumped by Blythe Energy. The only way to improve the water quality under the mesa is to pump out enough groundwater that better quality water is brought into the cone of depression formed by pumping. This is occurring with the groundwater in the southwestern portion of the Palo Verde Valley, in the well supplying water to Mesa Verde, and in the City of Blythe wells. The Report indicates just the opposite, that adjacent well water quality will be degraded (p.4.9-1, 4.9-7, 4.9-12) and that this process is irreversible (p.4.9-7, 4.9-12). This process is irreversible only if they don't pump enough water to recharge and mix better quality water with the well water. In developing a well, the well would probably be plugged at that level where brackish water was encountered to avoid pulling that water into the well.

6] Page 4.2-11, selenium issue: In the various 1960's mesa well water analysis reports we have, selenium is not mentioned but boron is. Selenium indicates that the water is being recharged by water from irrigating fields or from Rannells Drain which was diverted from the Colorado River.

7] Page 1-2, 4.9-2 and others, overall area topography: The Report fails to point out that the Colorado River (located about 9 miles easterly of the site) has an average water level that (in January 2005) is 1 foot or more higher than the water level in Rannells Drain at the north side of Hobsonway. Between the mesa and the Colorado River, there are two more drains and the City of Blythe wells. Irrigation water deep percolating to groundwater under every field creates a water mound that stops water in the Colorado River from flowing underground to the mesa. Valley groundwater next to the mesa slopes toward the nearest drain, not the Colorado River. It is the irrigation water from the Colorado River that is recharging the valley aquifer. For most of the valley, the River is not directly recharging the aquifer. Only along the River where no irrigation is occurring and groundwater is removed by phreatophytes or wells does the River directly recharge the valley aquifer.

8] Page 4.9-7, fresh water mesa aquifer: When the first wells were installed to pump mesa water in the 1960's, they could not be classified as pumping from a 'fresh water aquifer'. For nearby wells, electrical conductivity ranged from 1300 to 2700 micromhos, total dissolved solids from 809 to 1780 mg/liter, and boron from 900 to 1970 ug/liter. If that aquifer can be classified as a fresh water aquifer, it is due to recharge from irrigation water diverted from the River and from water in Rannells Drain.

9] Page 4.9-10, 4.9-17#4 & # 8, Colorado River Board: PVID disagrees with the Colorado River Board position. Blythe Energy II property lies within PVID boundaries, pays required fees, and is thus qualified to use Colorado River water under PVID's #3 and #6 Priorities as per agreements and contracts with the State of California and with the U. S. Bureau of Reclamation. The use of water by Blythe Energy II will be addressed under current PVID regulations.

10] Page 4.14-11 fire protection: This property lies within PVID's boundary and pays required fees. This property has a right to use groundwater under State law and to use Colorado River water since it is in PVID as long as it is a beneficial use. Fire protection would be a beneficial use. There should be no question as to whether or not the well water can be used for fire protection.

11] Other local site locations: All local sites have the same water use issues and pumping from groundwater legal issues.

If you have any questions, please call.

Sincerely

Roger Henning

Roger Henning
Chief Engineer