

**North Baja Pipeline Expansion Project  
Scoping Summary  
Draft - October 25, 2005**

Source	Date	Comment/Issue/Question
U.S. Fish and Wildlife Service (FWS) Interagency Scoping Meeting	9/27/05	<ul style="list-style-type: none"> <li>• Concerned about restoration, specifically at washes containing microphyll woodland vegetation. Tamarisk has invaded these areas.</li> <li>• North Baja Pipeline LLC (North Baja) should provide more post-construction oversight.</li> <li>• Concentrate mitigation efforts in areas of microphyll woodland north and adjacent to the Cibola National Wildlife Refuge (Cibola NWR) and the Milpitas Wash.</li> <li>• Conduct vegetation maintenance beyond the right-of-way in areas of microphyll woodland as part of off-site mitigation requirements.</li> <li>• Tamarisk removal along the existing right-of-way within the Cibola NWR attracts off-highway vehicle (OHV) users. Provides access to other more sensitive areas.</li> <li>• Only new impacts outside the footprint disturbed by construction of the existing pipeline would require mitigation.</li> <li>• Utilize the smallest construction footprint possible. Evaluate the feasibility of locating the loop closer to the existing pipeline than the proposed 25-foot offset.</li> <li>• Concerned about species that are state-listed but not federally listed, specifically the flat-tailed horned lizard. Implement the Flat-tailed Horned Lizard Rangeland Management Strategy.</li> <li>• Desert tortoise mitigation measures may have changed since 2002. The FWS will consider clarifying certain mitigation measures to prevent confusion over interpretation. Fencing and the worker bonuses were effective mitigation measures. Desert tortoise sign in the current survey corridor has increased since the previous project.</li> <li>• Flat-tailed horned lizard and Peirson's milkvetch are concerns in the Imperial Sand Dunes Recreation Area (ISDRA).</li> <li>• Salvaged plant material may not be of value in open areas where there is no similar vegetation.</li> <li>• The Migratory Bird Treaty Act will be an issue. Burrowing owls are likely to occur adjacent to canals. Previous relocation efforts have not been successful. The commonly used 500-foot buffer may not be sufficient. May be increased to a 0.25-mile buffer.</li> <li>• Mitigation measures should allow for an adaptive response to issues identified in the field.</li> <li>• The Biological Assessment could be included in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and the Biological Opinion could be included in the Final EIS/EIR.</li> </ul>
FWS, Cibola National Wildlife Refuge Interagency Scoping Meeting	9/28/05	<ul style="list-style-type: none"> <li>• Removal of tamarisk during the installation of the existing pipeline created a defined "freeway" for OHV users. OHV users cut the fencing installed by North Baja. The right-of-way allows OHV users to access other more sensitive areas north of Mitchell's Camp Road. Requests more fencing along the Cibola NWR boundary. OHV use was not a problem prior to installation of the existing pipeline.</li> <li>• Would consider dry land restoration such as the removal of exotics from areas of mesquite and 3 to 4 years of maintenance.</li> <li>• Consider using the same seed mix used near Yuma.</li> <li>• The expansion project would likely be considered compatible with Cibola's management plan. An Environmental Assessment would be needed.</li> </ul>
Bureau of Reclamation (BOR)/Bureau of Land Management (BLM) Interagency Scoping Meeting	9/29/05	<ul style="list-style-type: none"> <li>• Construction of the proposed Imperial Irrigation District (IID) Lateral could be affected by the All American Canal Lining project and the BOR's canal and reservoir construction projects.</li> <li>• The proposed location of the IID Lateral appears to conflict with the location of a new canal proposed for the BOR's Drop 2 Project.</li> <li>• If the IID Lateral crosses BOR-withdrawn land, the BOR would have to concur.</li> <li>• Major issues associated with the IID Lateral include: timing, location, impacts on facilities, sand movement, and designated open areas.</li> <li>• The BLM strongly recommends against a winter construction schedule for the IID Lateral due to potential conflicts with recreational users. Safety issues could result. Recommends a mid-May through September construction schedule.</li> <li>• A pipe cover of 3 feet might not be deep enough in the ISDRA. Users dig holes for bonfires among other activities that may be potentially detrimental to the pipeline. Pipe depth could also be an issue on the valley floor where recreational use occurs.</li> <li>• There is a designated utility corridor through the ISDRA. A route adjacent to an existing powerline should be considered.</li> <li>• Concerned about open-cut road crossings. Certain roads require access by the U.S. Border Patrol. Would need to consider repair to the road membrane and the potential for future settling.</li> <li>• The IID Lateral could potentially affect the historical Plank Road Area of Critical Environmental Concern.</li> <li>• The aboveground portions of cathodic protection systems could be targets for vandalism.</li> </ul>

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		<ul style="list-style-type: none"> <li>• The project could affect a future border fence proposed.</li> <li>• Construction crews would need to coordinate with the U.S. Border Patrol. Open trenches could be used for illegal activities.</li> <li>• The flat-tailed horned lizard could be federally listed by the time the project begins.</li> <li>• The project could impact Peirson's milkvetch .</li> </ul>
Blythe Public Scoping Meeting Transcript	9/28/05	<ul style="list-style-type: none"> <li>• Concerned about public safety.</li> <li>• North Baja did not address public concerns during the development of the existing pipeline.</li> <li>• The existing pipeline required a larger construction area than was originally proposed to cross the Colorado River.</li> <li>• Concerned about the destruction of desert habitat and restoration. Requests that property be restored to preconstruction conditions. Concerned that natural revegetation could take between 50 to 100 years.</li> <li>• Concerned about increased OHV use. The cleared right-of-way attracts OHV users. North Baja denied the landowner's request for fencing.</li> <li>• FERC has not responded to the landowner's complaints regarding post-construction conditions along the existing pipeline.</li> <li>• The pipeline right-of-way inhibits the development of private property and limits public access to the riverfront.</li> <li>• New right-of-way will affect public utilities (i.e., water and sewer lines) as well as public roads and a bridge to Riviera Drive and the Riviera subdivision.</li> <li>• There are 200 feet between North Baja's existing pipeline and another existing pipeline, which limits use of the area.</li> <li>• Concerned about noxious weeds in the existing right-of-way, specifically tamarisk.</li> <li>• The existing pipeline is not located entirely within North Baja's easement on the landowner's property.</li> <li>• Will protest the proposed pipeline expansion.</li> <li>• The existing easement allows for only one pipeline. The landowner will not agree to another pipeline within the easement.</li> <li>• Concerned about visual impacts and restoration.</li> <li>• Consider an alternative route along the Arizona side of the Colorado River.</li> <li>• Consider locating the new pipeline between the existing pipelines.</li> <li>• Concerned about the large distance between the existing pipelines.</li> </ul>
El Centro Public Scoping Meeting Transcript	9/28/05	<ul style="list-style-type: none"> <li>• The pipeline would be located near school district property near Ogilby Road.</li> <li>• Requests that North Baja communicate with the landowners adjacent to the county right-of-way.</li> <li>• Requests that landowners be indemnified against accidents or agricultural damages.</li> <li>• Requests explanation about pipeline abandonment.</li> <li>• A school is located on Darwin Road.</li> <li>• The IID Lateral route as shown in the Notice of Intent/Notice of Preparation (NOI/NOP) would affect a neighborhood water delivery system.</li> <li>• Concerned about loss of mature landscaping, which mitigates dust impacts.</li> <li>• Concerned about lost rental revenue.</li> <li>• Prefers the route shown in blue on the NOI/NOP map because it would affect the other landowners less.</li> <li>• Consider using an existing easement 1/4 mile north of Ross Road and 1/4 mile south of the home sites on Parker Road.</li> <li>• Questioned about conflicts with the All American Canal projects.</li> <li>• Concerned about visual impacts. Questioned if seeding or replanting would be conducted.</li> <li>• Questioned how close houses can be built to the gas line.</li> <li>• Questioned about new easements along the IID Lateral.</li> <li>• Questioned about landowner compensation for new easements.</li> <li>• Questioned what seismic studies have been done.</li> <li>• Describe the depth of the pipeline.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Discuss the compaction levels over the pipeline considering a high water table and clay soils.</li> <li>• Not enough room in the county easement for a pipeline.</li> <li>• Note: The Imperial County Air Pollution Control District read a written comment letter into the record. Those comments are presented further below (see letter dated 9/26/2005) with the other written comment letters.</li> </ul>
B.G. Banks/Stallard Family Trust Written Comment Letter (E-mail)	7/4/05	<ul style="list-style-type: none"> <li>• Protection of trees</li> </ul>
Imperial County Air Pollution Control District Written Comment Letter	7/7/05	<ul style="list-style-type: none"> <li>• Concerned that additional supply of natural gas to the Mexicali Valley would adversely impact Imperial County's air quality.</li> <li>• Include the specifics (size, rating, expected emissions, etc.) of the proposed compressor station to be built south of Algodones, Mexico. Concerned that this station could have large NOx emissions.</li> <li>• Locate the proposed Mexican compressor station in the U.S. (not on Indian Land) so emissions can be mitigated appropriately.</li> <li>• Concerned about the "Hot Gas" issue and the potential of large NOx increases due to High-Btu Liquefied Natural Gas (LNG).</li> <li>• Concerned that the U.S. standards and the Wobbe Number (heating value of gas number) are inadequate to mitigate the impacts and protect air quality. Include a comparison of U.S. gas quality standards with Mexico's.</li> <li>• Provide an in-depth, detailed list of the mitigation measures that would be implemented to control emissions during the construction and operation phases of all facets of the proposed project.</li> <li>• Conduct a cumulative health risk assessment for the project and the associated facilities that they will foreseeably serve.</li> </ul>
Imperial County Board of Supervisors Written Comment Letter	7/7/05	<ul style="list-style-type: none"> <li>• Concerned that additional supply of natural gas to the Mexicali Valley would adversely impact Imperial County's air quality.</li> <li>• Locate the proposed Mexican compressor station in the U.S. (not on Indian Land) so emissions can be mitigated appropriately.</li> <li>• Include the specifics (size, rating, expected emissions, etc.) of the proposed compressor station to be built south of Algodones, Mexico. Concerned that this station could have large NOx emissions.</li> <li>• Concerned about the "Hot Gas" issue and the potential of large NOx increases due to High-Btu LNG.</li> <li>• Opposes any expansion of the North Baja pipeline unless assurances are provided that offsets will be secured in Imperial County for excess emissions from the Semptra and Intergen facilities, BACT emission controls are installed on new facilities utilizing gas supplied from this pipeline, and offsets are required for excess emissions for any new facilities.</li> </ul>
Imperial County Planning & Development Services Written Comment Letter	7/8/05	<ul style="list-style-type: none"> <li>• Concerned about the use of the term "precedent agreement" in North Baja's BLM application. Questioned if that would mean future pipelines and incremental increases would not require further federal, state, and local approval or environmental review.</li> <li>• Identify what other Imperial County agencies besides the IID would utilize gas from the new pipeline.</li> <li>• Provide a map of the "full looping" proposed through Imperial County to the IID and include a phasing schedule.</li> <li>• Concerned about use of the term "incremental increase" in North Baja's BLM application. Federal and state laws prohibit piece-mealed or bi-furcated projects.</li> <li>• Clarify how many pipelines are envisioned within the BLM right-of-way.</li> <li>• Include mitigation for the potential for pipeline rupture due to seismic events.</li> <li>• Identify the federal, county, and Mexican emergency response procedures to be implemented if a seismic event ruptures the pipeline.</li> <li>• The pipeline will cross a federally designated flat-tail horned lizard management study area and potential desert tortoise critical habitat. Burrowing owls will be impacted on agricultural lands. Provide appropriate mitigation measures.</li> <li>• The IID East Highline Canal may be impacted.</li> <li>• Identify the federal or state air quality mitigation and offsets for future long-term health risks proposed for Imperial County and Mexicali residents.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Assuming a 42-inch pipeline is installed, identify the air impacts resulting from the total number of power plants and future heavy industrial, commercial, and economic development projects that could be constructed within the Southeast Desert Air Basin (SEDAB) and address the potential long-term air quality deterioration and possible human health impacts.</li> <li>• This project could result in significant PM-10 emissions due to fugitive dust emissions generated by vehicles traveling on both Mexican and Imperial Valley unpaved roads along the existing BLM right-of-way resulting in the exceedance of the California Ambient Air Quality Standard for this pollutant.</li> <li>• Transport of criteria pollutants (e.g., PM-10 and ozone) will occur in the future from any new heavy industrial, commercial, and economic development projects resulting from the construction of this second pipeline.</li> <li>• Conduct a comprehensive health risk assessment of potential toxic emissions.</li> <li>• Identify the full implications of the potential health risks under both federal and state law to consider the whole of the project's cumulative environmental effect of these pipelines, including those future commercial/Industrial projects that could significantly impact the SEDAB airshed. Identify what applicable air quality offsets would be proposed.</li> </ul>
Jeannette Banks Written Comment Letter	9/13/05	<ul style="list-style-type: none"> <li>• Concerned about loss of native vegetation and lack of revegetation along the existing pipeline.</li> <li>• The lack of cover causes extreme runoff and erosion preventing access along Stallard Road. Install culverts at wash crossings.</li> </ul>
Imperial County Air Pollution Control District Written Comment Letter (Also Read at the EI Centro Public Scoping Meeting)	9/26/05	<ul style="list-style-type: none"> <li>• The Imperial County Air Pollution Control District (ICAPCD) requests cooperating agency status.</li> <li>• Provide details of the modifications proposed at the Ogilby Meter Station. Identify any related air quality impacts.</li> <li>• Explain whether a compressor station would be located south of the border near Algodones, Mexico and, if so, provide specific details of this facility.</li> <li>• The ICAPCD expects to see associated emissions for both construction and operation of facilities associated with the IID lateral, specifically the IID EI Centro Generating Station, as well as mitigation measures to control and minimize emissions.</li> <li>• The ICAPCD concerns related to the loop also apply to the IID Lateral.</li> <li>• The Notice of Intent describes land ownership for 40 miles of the IID Lateral. Request clarification of the land ownership for the remaining 6 miles.</li> <li>• The EIS/EIR should consider associated and/or connected equipment to the proposed expanded North Baja pipeline that may be in Mexico (e.g., compressor station south of the border, new or modified electrical generating facilities located in the Mexicali Region).</li> <li>• The ICAPCD insists that a cumulative health risk assessment be conducted for the proposed project and the associated facilities and included in the Air Quality or Cumulative Impacts section of the Draft EIS/EIR.</li> <li>• Concerned that the construction of more power plants and other industry south of the U.S./Mexican border resulting from additional gas supplies would not have to meet equivalent air quality standards to protect public health. These facilities will contribute enormous amounts of emissions to the Imperial Valley's airshed that will adversely impact air quality.</li> <li>• Insists that any compressor station proposed south of the border be located in the U.S. (and not on Indian or Tribal Land) so emissions can be mitigated appropriately. Concerned the proposed compressor station could be considered a large NOx emitter.</li> <li>• Concerned about the "Hot Gas" issue, which has the potential for large NOx increases.</li> <li>• The ICAPCD has serious concerns that the standards for gas quality that are used for the U.S. market and the Wobbe Number are inadequate to mitigate the impacts and protect air quality. Compare U.S. gas standards with Mexico's.</li> <li>• Provide an in-depth, detailed list of the mitigation measures to control emissions during the construction and operation phases of all facets of the proposed project.</li> </ul>
David C. Nowell Written Comment Letter	9/28/05	<ul style="list-style-type: none"> <li>• Concerned about public safety.</li> <li>• North Baja did not address public concerns during the development of the existing pipeline.</li> <li>• The existing pipeline required a larger construction area than was originally proposed to cross the Colorado River.</li> <li>• Concerned about the destruction of desert habitat and restoration. Requests that property be restored to preconstruction conditions. Concerned that natural revegetation could take between 50 to 100 years.</li> <li>• Concerned about increased OHV use. The cleared right-of-way attracts OHV users. North Baja denied the landowner's request for fencing.</li> </ul>

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Bureau of Reclamation Written Comment Letter	9/29/05	<ul style="list-style-type: none"> <li>• Requests cooperating agency status in regards to consultation with Section 106 of the National Historic Preservation Act (NHPA).</li> <li>• The loop and IID Lateral will cross Reclamation-withdrawn lands in the Palo Verde area.</li> <li>• Several prehistoric archaeological sites eligible for listing on the National Register of Historic Places (NRHP) were located on withdrawn parcels during inventories for the existing pipeline. Construction of another pipeline parallel to the original North Baja pipeline has the potential to adversely affect the integrity of the buried cultural strata at CA-IMP-791 I/H, an extremely important resource.</li> <li>• Need to consider potential effects on the All American Canal and the Coachella Canal, which have previously been determined eligible for listing on the NRHP.</li> <li>• Other prehistoric sites that might be located on Reclamation lands along the All American Canal and affected by the IID Lateral need to be evaluated and treated for potential listing on the NRHP in a manner consistent with the agreement reached between Reclamation and the other consulting parties for the All American Canal Re-Lining Project.</li> </ul>
C.R. & Olivia Waegner Written Comment Letter	9/29/05	<ul style="list-style-type: none"> <li>• The IID Lateral route as shown in the NOI/NOP would affect a neighborhood water delivery system.</li> <li>• Concerned about loss of mature landscaping, which mitigates dust impacts.</li> <li>• Concerned about lost rental revenue.</li> <li>• Prefers the route shown in blue on the NOI/NOP map because it would affect the other landowner less.</li> <li>• Consider using an existing easement 1/4 mile north of Ross Road and 1/4 mile south of the home sites on Parker Road.</li> </ul>
U.S. Army Corps of Engineers (COE) Written Comment Letter	9/30/05	<ul style="list-style-type: none"> <li>• A COE permit is required for the discharge of dredged or fill material into "waters of the United States" and adjacent wetlands.</li> <li>• Examples of fill activities include: <ul style="list-style-type: none"> <li>(a) creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;</li> <li>(b) mechanized land clearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;</li> <li>(c) allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States; and</li> <li>(d) placing pilings when such placement has or would have the effect of a discharge of fill material.</li> </ul> </li> </ul>
Ramona Band of the Cahuilla Written Comment Letter	10/4/05	<ul style="list-style-type: none"> <li>• Concerned that Native American cultural artifacts will be discovered, disturbed, and destroyed. A certified archaeologist should be hired. Mitigation should be implemented for disturbance.</li> <li>• A herpetologist needs to precede the earth-disturbing equipment to monitor for the flat-tailed horned lizard and desert tortoise. The EIS needs to require documentation of the presence of these species and actions taken to prevent harm to them.</li> <li>• The project is within the traditional use area of the Cahuilla People. Extremely concerned about the Native American sites that are in or near the project site. Concerned that excavation could uncover Native American artifacts that may have significant sacred, religious, and cultural value.</li> <li>• Include a Native American Monitor in any further field study and during the construction phase of the project. The cost of the monitor should be made a part of the construction budget. Requests copies of the archaeological survey report and the records search report for the project.</li> </ul>

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Dion International Trucks, LLC Written Comment Letter	10/6/05	<ul style="list-style-type: none"> <li>• In favor of the IID Lateral preferred route.</li> <li>• Strongly opposes the IID Lateral alternative route due to disruptions of business, and safety concerns for employees due to the presence of high voltage powerlines and high pressure natural gas pipelines along the IID Lateral alternative route.</li> </ul>
U.S. Environmental Protection Agency (EPA) Written Comment Letter	10/6/05	<ul style="list-style-type: none"> <li>• Include a comprehensive evaluation and disclosure of environmental impacts from the project and all connected actions on both sides of the U.S.-Mexican border.</li> <li>• Identify the connected actions that will occur in Baja California and provide a discussion of the applicability of Executive Order 12114, Environmental Effects Abroad of Major Federal Actions, to the proposed action.</li> <li>• The DEIS should discuss the reasonably foreseeable environmental effects.</li> <li>• The DEIS should clearly identify the underlying purpose and need.</li> <li>• The DEIS should provide an overview of the current energy structure on both sides of the U.S.-Mexican border, describing sources of natural gas, existing gas pipelines (location, capacity, ownership, etc.), and power plants supplied by those pipelines. It should also clarify how the proposed expansion relates to the purpose and need of the original North Baja Pipeline Project.</li> <li>• Specific information pertaining to changes that have/will occur in the Baja California energy market should be discussed.</li> <li>• Disclose the potential sources of gas from Mexico that will be imported into the United States.</li> <li>• Evaluate in detail all reasonable alternatives that meet the project's purpose and need, including alternatives outside the legal jurisdiction of the lead agencies. Environmental impacts for each alternative should be quantified. Discuss the reasons that certain alternatives were eliminated.</li> <li>• Discuss ambient air conditions (baseline or existing conditions), Clean Air Act (CAA), National Ambient Air Quality Standards, criteria pollutant nonattainment areas for the project, and potential air quality impacts (including cumulative and indirect impacts) for each fully evaluated alternative. Construction-related impacts should also be discussed.</li> <li>• The FERC should coordinate with state and local air pollution control districts in evaluating permitting requirements and potential impacts of the project on air quality.</li> <li>• Address the applicability of CAA Section 176 and the EPA's general conformity regulations at 40 Code of Federal Regulations (CFR) Parts 51 and 93. Federal agencies need to ensure that their actions, including construction emissions subject to state jurisdiction, conform to an approved implementation plan.</li> <li>• Consider implementing the following mitigation measures to reduce construction-related air emissions: <ul style="list-style-type: none"> <li>(a) Reduce emissions of diesel particulate matter (DPM) and other air pollutants by using particle traps and other technological or operational methods.</li> <li>(b) Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.</li> <li>(c) Prohibit engine tampering to increase horsepower.</li> <li>(d) Locate diesel engines, motors, and equipment as far as possible from residential areas and sensitive receptors.</li> <li>(e) Require low sulfur diesel fuel (&lt;15 parts per million), if available.</li> <li>(f) Reduce construction-related trips of workers and equipment, including trucks.</li> <li>(g) Lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower.</li> <li>(h) Use engine types such as electric, liquefied gas, hydrogen fuel cells, and/or alternative diesel formulations.</li> <li>(i) Adopt a Construction Emissions Mitigation Plan to reduce construction emissions.</li> <li>(j) Work with the local air pollution control district(s) to implement the strongest mitigation for reducing construction emissions.</li> </ul> </li> <li>• Include a description (including acreage and channel lengths, habitat types, values, and functions) and provide maps of all waters of the U.S. within the project area.</li> <li>• Any permitted discharge into waters of the U.S. must be the least environmentally damaging alternative.</li> <li>• If discharges into waters of the U.S. are proposed, alternatives should be evaluated that would avoid such discharges.</li> <li>• Encourages early coordination with the COE.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Discuss measures to be implemented that would minimize or mitigate any proposed discharges. The discussion should include the following:               <ul style="list-style-type: none"> <li>(a) acreage and habitat type created or restored;</li> <li>(b) water sources to maintain the mitigation area;</li> <li>(c) detailed revegetation plans;</li> <li>(d) maintenance and monitoring plans, including performance standards;</li> <li>(e) the size and location of mitigation zones;</li> <li>(f) the responsible parties; and</li> <li>(g) contingency plans.</li> </ul> </li> <li>• Mitigation should be implemented in advance.</li> <li>• Provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise Total Maximum Daily Loads (TMDLs). Describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures proposed to avoid further degradation of impaired waters.</li> <li>• Address potential direct, indirect, and cumulative impacts of hazardous waste from construction and operation and include projected hazardous waste types and volumes, and expected storage, disposal, and management plans. Address the applicability of Federal and state requirements. Include measures to minimize the generation of hazardous waste, including alternate industrial processes using less toxic materials.</li> <li>• Identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. Identify and quantify which species or critical habitat might be directly or indirectly affected by each alternative. Recommends the DEIS include a BA as well as a description of the outcome of the FWS Section 7 consultation.</li> <li>• Disclose the parties that would be responsible for avoiding, minimizing, and mitigating any adverse cumulative impacts identified.</li> <li>• The DEIS should focus on resources that are at risk and/or are significantly impacted by the proposed project before mitigation.</li> <li>• The Cumulative Impacts section should identify which resources are analyzed, which ones are not, and why. For each resource:               <ul style="list-style-type: none"> <li>(a) Identify the current condition of the resource as a measure of past impacts.</li> <li>(b) Identify the trend in the condition of the resource as a measure of present impacts.</li> <li>(c) Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends.</li> <li>(d) Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.</li> <li>(e) Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.</li> <li>(f) Identify opportunities to avoid and minimize impacts, including working with other entities.</li> </ul> </li> <li>• Describe the reasonably foreseeable future land use and associated impacts that will result from the additional power supply provided by the IID Lateral. Provide an estimate of the amount of growth, its likely location, and the biological and environmental resources at risk.</li> <li>• Evaluate the feasibility of adopting mitigation to avoid, reduce, or compensate for adverse environmental impacts from construction and operation. Recommend presenting all reasonable mitigation and pollution prevention measures.</li> <li>• Describe the process and outcome of government-to-government consultation between the FERC and each of the tribal governments within the project area.</li> <li>• Address the existence of Indian sacred sites in the project area. Address Executive Order 13007 and distinguish it from Section 106 of the NHPA. Discuss how the FERC will avoid adversely affecting the physical integrity of sacred sites, if they exist, and address other requirements of the Order.</li> <li>• Include an evaluation of environmental justice populations within the project area. Address the potential for disproportionate adverse impacts on minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of the project's impact on minority and low-income populations should reflect coordination with those affected populations.</li> <li>• Require an invasive plant management plan, and a plan to utilize native plants for restoration.</li> <li>• Evaluate alternatives that would avoid the need to revise the management plans for the California Desert Conservation Area and the Milpitas Wash Special Management Area.</li> <li>• Discuss how the proposed action would support or conflict with the objectives of other federal, state, tribal or local land use plans, policies and controls in the project area.</li> </ul>

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Source	Date	Comment/Issue/Question
Desert Protective Council Written Comment Letter	10/10/05	<ul style="list-style-type: none"> <li>• Hundreds of very old ironwood and palo verde trees and all other desert plant life were removed along the 50-foot-wide swath of right-of-way for the existing pipeline. Concerned about the lack of revegetation.</li> <li>• Develop a revegetation plan for the previously disturbed area and the area of new construction to address the re-planting of Sonoran desert scrub species.</li> <li>• Monitor revegetation for at least 5 years and include a contingency plan if revegetation is unsuccessful.</li> <li>• Consider an alternative that disturbs as little new area as possible.</li> </ul>
Metropolitan Water District of Southern California Written Comment Letter	10/11/05	<ul style="list-style-type: none"> <li>• Requests North Baja follow the conditions as set forth in the Right-of-Way Agreement for Metropolitan Water District fee-owned property. Requests the conditions of the easement be included in the EIS/EIR.</li> </ul>
David Schoneman Written Comment Letter (E-mail)	10/12/05	<ul style="list-style-type: none"> <li>• Avoid agricultural and air quality impacts associated with the IID Lateral by locating the IID El Centro Power Generating Station on the old Brock Research facility property, which is located outside of the Imperial Valley air basin in an unpopulated area near transpiration and other utilities.</li> </ul>
California Energy Commission (CEC) Written Comment Letter	10/14/05	<ul style="list-style-type: none"> <li>• Use existing rights-of-way to reduce impacts on biological resources.</li> <li>• Waterbody crossings should conform to the construction practices and mitigation measures in 33 CFR 323.4 (nationwide permit requirements). If nationwide permit requirements are exceeded, apply for an individual permit from the COE. A Streambed Alteration Agreement with the California Department of Fish and Game may be required.</li> <li>• Prior to construction, survey the project area for cultural resources in accordance with methods approved by the California Office of Historic Preservation.</li> <li>• Reduce impacts on productive agricultural lands to the extent feasible.</li> <li>• The project could affect residences and school bus routes. Notify all landowners along the route of the construction timetable. Post the route and information regarding potential disruptions.</li> <li>• All portions of the project within California should meet the standards of the California Public Utilities Commission, General Order 112-E (CPUC GO 112-E).</li> <li>• Follow Occupational Safety and Health Act, Subpart P, 29 CFR 1926.650, .651, and .652 during trenching and excavation. A qualified engineer and environmental specialist should monitor all field</li> <li>• Conduct hydrostatic testing in accordance with Department of Transportation Standard 49 CFR 192. Use the American Standard Code for Gas Transmission and Distribution Piping Systems, ANSI B31.8, Chapter IV, Design, Installation, and Testing.</li> <li>• Depth of cover over the pipe should be at least 3 feet. The depth of cover should be a minimum of 5 feet in agricultural and residential areas and at drainage ditch and canal crossings. At highway and railroad crossings the depth of cover should be in accordance with appropriate regulations and authorities.</li> <li>• The CEC adopted conditions of certification for the Blythe Energy Power Plant, some of which would apply to the lateral proposed to the Blythe Energy Power Plant, such as mitigation for potential air impacts (PM-10 and fugitive dust) and construction noise and traffic impacts.</li> <li>• The CEC has jurisdiction of the proposed lateral to the Blythe Energy Power Plant. This portion of the project will require the CEC's approval. The CEC will process an amendment to the plant's current permit, which will address the tie-in.</li> </ul>