



September 27, 2024

Board of Governors
California ISO
P.O. Box 639014
Folsom, CA 95630

Public comment letter – General Session, October 4, 2024
Relating to SWIP-N Participating Transmission Owner Decision
Submitted to: sbernard@caiso.com and kosborne@caiso.com

Dear CAISO Board of Governors:

Thank you for the opportunity to submit comments relating to the SWIP-N Participating Transmission Owner application.

I write on behalf of the Minidoka Pilgrimage Planning Committee, a Seattle-based non-profit, that organizes annual pilgrimages to the Minidoka National Historic Site (NHS), a unit of the National Park System in Idaho. Minidoka tells the story of the forced incarceration of Japanese Americans from California, Oregon, Washington and Alaska during World War II.

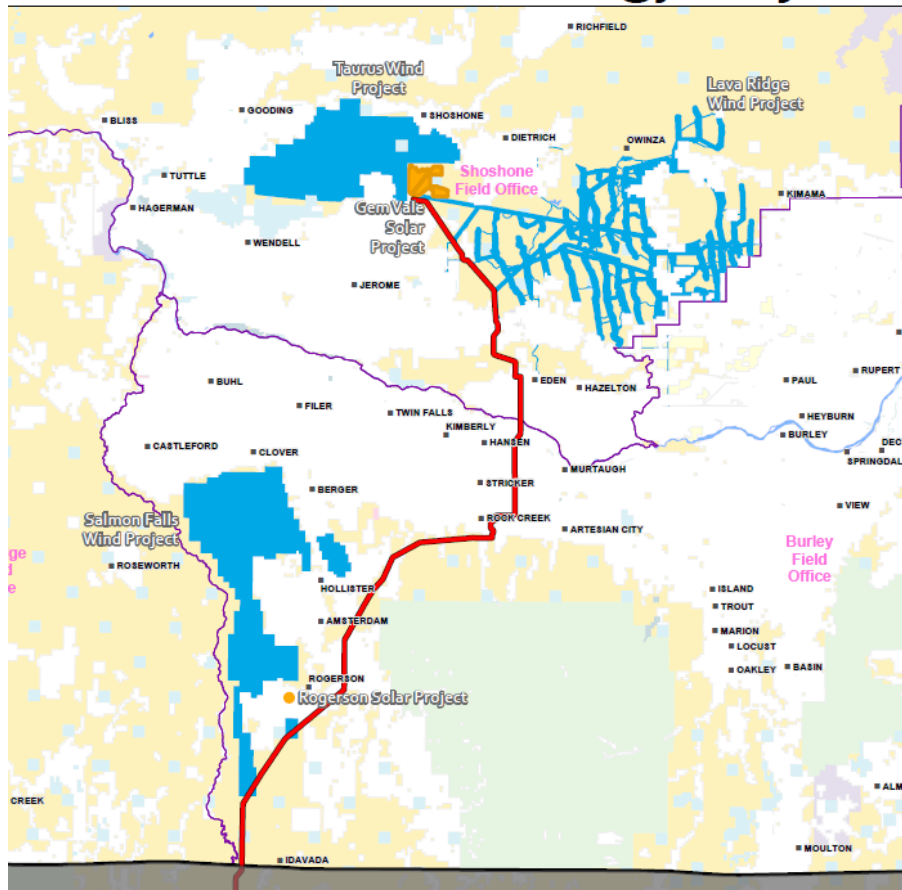
In order to transport 13,000 Japanese Americans from their homes to Idaho, the U.S. Government sited Minidoka near a railroad line. Today, the rail lines are collocated with a dense network of current and proposed transmission lines.

In 2009, LS Power (Great Basin Transmission) sought approval to build the SWIP-N line through the middle of Minidoka NHS. Fortunately, the Obama Administration moved the line away from the park.

In 2021, LS Power (Magic Valley Energy) proposed the Lava Ridge wind project on the historic footprint of Minidoka. The proposed Lava Ridge wind project is the first of three wind projects that would support CPUC's goals for out-of-state (OOS) wind energy from Idaho. Because of its unacceptable impacts, the Lava Ridge wind project has generated significant opposition locally and nationally and a high level of legal, regulatory and political risk.

For reasons outlined below, we respectfully request the CAISO Board take a "look before you leap" approach to transmission investments by deferring any further approvals of the SWIP-N line until it conducts a comprehensive analysis of legal, regulatory and political risks associated with the three Southern Idaho wind projects.

Twin Falls District Energy Projects



Source: BLM SWIP-N Power line depicted in red.

Two of the three pending wind projects — Lava Ridge and the nearby Taurus wind project — are subject to litigation challenges. Future litigation is expected. The third project, LS Power's Salmon Falls project, has led Twin Falls County to impose a moratorium on renewable energy projects.

In its December 2023 Memo to the Board, the CAISO staff noted: "[t]he CPUC portfolios are based on generic wind resources in Idaho, and are not tied to specific generating facilities." While the portfolios are generic, the three proposed wind projects are the main rationale for investments in the SWIP-N Line.

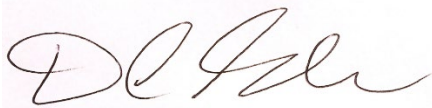
As part of this comprehensive analysis, we encourage CAISO to consider the breadth and intensity of the opposition to the Lava Ridge wind project including:

- Governor Little, Lt. Gov. Bedke and the Idaho State Legislature.
- Idaho Congressional delegation, which has introduced legislation pending in Congress, including on a must-pass annual appropriations bill and standalone authorizing bill.

- Idaho Attorney General's litigation in federal district court challenging an FAA decision.
- Seven Idaho counties, including counties with permitting jurisdiction.
- Tribal Nations, with off-reservation Treaty Rights.
- The Japanese American community, a dispersed environmental justice community.
- Decisions by the Idaho State Historic Preservation Officer and Advisory Council on Historic Preservation (ACHP) to terminate Section 106 consultation.
- Cattle ranchers, who are challenging the Taurus wind project in court.
- Local farmers and public at large, who have commented against the project in the NEPA process.

Thank you for considering our views to conduct an analysis of the viability of the three wind projects before advancing the SWIP-N project.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dan Sakura', is centered on a light pink rectangular background.

Dan Sakura
Advisor
Minidoka Pilgrimage Planning Committee
Descendant, three generations of Minidoka survivors