

Comment Set C15
Alan Timmerman

August 9, 2006
1505 W. St. Marys Rd. #154
Tucson, AZ 85745

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

To Whom It May Concern:

I am writing to state my opposition to the proposed Devers-Palo Verde power transmission line. Here are my concerns:

1) A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge.

2) Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.

3) Mitigation of negative impacts to plant resources (i.e., transplanting cacti) was not successful during construction of the first power line. Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

4) The primary route is not an environmentally friendly route to plan the ROW but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project.

5) This project has been in a near "finalized" form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to send power to California?

C15-1

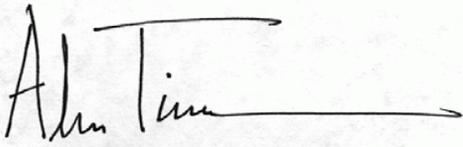
Comment Set C15, cont.
Alan Timmerman

6) There were many factors that caused the "Rolling Blackouts" in California a few years ago. One of the main reasons was a struggle between the regulators and the power companies and the energy companies withholding electricity to drive up the price. We should not let the decision makers sway the argument based on the contrived rolling blackouts.

C15-1 cont.

Please make my comments part of the official record.

Sincerely,

A handwritten signature in black ink that reads "Alan Timmerman". The signature is written in a cursive style with a long horizontal stroke extending to the right from the end of the name.

Alan Timmerman

Responses to Comment Set C15 Alan Timmerman

- C15-1 The commenter's opposition to the Proposed Project is noted. Please refer to Responses B1-2 through B1-5.

Comment Set C16
Melissa Lopez

Devers–Palo Verde No. 2 Transmission Line Project

From: melissa lopez [bluecornsky@yahoo.com]
Sent: Thursday, August 10, 2006 12:51 AM
To: dpv2@aspeneq.com
Subject: Please help protect the KOFA National Wildlife Refuge

Dear John Kalish and Billie Blanchard: 8-10-06

I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS). This is the only acceptable alternative and is clearly the Environmentally Preferred Alternative. The costs of this project to the environment are too great in comparison with any benefits, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project.

C16-1

A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge.

C16-2

Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42). Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well.

C16-3

Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.

C16-4

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional

Comment Set C16, cont.
Melissa Lopez

impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

C16-4 cont.

The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA." An alternative to this proposed telecommunications site should have been considered. Again, no action is the only alternative that will keep this area from being degraded.

C16-5

The primary route is not an environmentally friendly route, but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project and to select the no action alternative.

C16-6

This project has been in a near "finalized" form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to send power to California?

Non-development alternatives should be considered to meet California's energy needs including significant energy efficiency and conservation programs and environmentally-friendly, renewable, and sustainable energy sources (i.e., solar, wind). Distributed solar energy and energy efficiency and conservation can reduce the need for additional transmission lines.

The environmental costs of this project are too high. The benefits of it are negligible. Please select the no action alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line.

Thank you for considering my comments.

Sincerely,

Melissa A. Lopez
3003 N. Alvernon Way #205
Tucson, AZ 85712

Responses to Comment Set C16 Melissa Lopez

- C16-1 The commenter's preference for the No Project/No Action Alternative has been noted.
- C16-2 Please refer to Response B1-2.
- C16-3 As stated in the Draft EIR/EIS, both the proposed *and* north of Kofa NWR alternative routes would create significant and unmitigable impacts to visual and recreational resources in the area in and around Kofa NWR. The commenter is correct that Section D.3.6.2 states that Impact V-7 [Increased visual contrast, view blockage, and skylining when viewed from Key Viewpoint 4 on Crystal Hill Road in Kofa NWR (VS-VC)] would be significant and unmitigable (Class I), and Section D.5.6.2 states that Impact WR-2 (Operation would change the character of a recreation or wilderness area, diminishing its recreational value) in Kofa NWR would be significant and unmitigable (Class I) for the Proposed Project.
- C16-4 Please see Responses B1-3 and B1-4.
- C16-5 Please refer to Response B5-6 and B8-17 for a discussion of the Harquahala Mountains.
- C16-6 Please refer to B1-5, B1-6, and B1-7. The commenter's preference for the No Project/No Action Alternative has been noted.

Comment Set C17 Jack Grenard

Devers–Palo Verde No. 2 Transmission Line Project

From: Jgrenard@aol.com
Sent: Thursday, August 10, 2006 9:16 AM
To: dpv2@aspeneq.com
Subject: KOFA

Dear John Kalish and Billie Blanchard:

I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the *Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS)*. This is the only acceptable alternative and is clearly the Environmentally Preferred Alternative. The costs of this project to the environment are too great in comparison with any benefits, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and probably increased electricity rates as a result of this project. A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge. Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42). Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well. Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles. The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA."

C17-1

C17-2

C17-3

C17-4

C17-5

Comment Set C17, cont.
Jack Grenard

An alternative to this proposed telecommunications site should have been considered. Again, no action is the only alternative that will keep this area from being degraded. The primary route is not an environmentally friendly route, but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project and to select the no action alternative. This project has been in a near “finalized” form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then is this line needed to send power to California? Non-development alternatives should be considered to meet California’s energy needs including significant energy efficiency and conservation programs and environmentally-friendly, renewable, and sustainable energy sources (i.e., solar, wind). Distributed solar energy and energy efficiency and conservation can reduce the need for additional transmission lines. The environmental costs of this project are too high. The benefits of it are negligible.

Please select the no action alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line. Thank you for considering my comments.

Sincerely,

Jack Grenard
"To all my relations"
JGrenard@aol.com
Box 5268
Carefree, Arizona 85377 USA
480.488.1462, cell 480.204.0917

C17-5 cont.

C17-6

Responses to Comment Set C17 Jack Grenard

- C17-1 The commenter's preference for the No Project/No Action Alternative has been noted.
- Please refer to General Response GR-2 for a discussion of the benefits to Arizona. Arizona electricity rates are set by the Arizona Corporation Commission. The comment regarding increased electricity rates in Arizona is not within the scope of the environmental review under NEPA or CEQA.
- C17-2 Please refer to Response B1-2.
- C17-3 Please refer to Response C16-3.
- C17-4 Please refer to Response B1-3 and B1-4.
- C17-5 Please refer to Response B5-6 and B8-17 for a discussion of the Harquahala Mountains.
- C17-6 Please see Response B1-4 through B1-7. The commenter's preference for the No Project/No Action Alternative has been noted.

Comment Set C18
Lola M. Boan

Devers–Palo Verde No. 2 Transmission Line Project

From: lola m boan [lboan9@juno.com]
Sent: Thursday, August 10, 2006 11:13 AM
To: dpv2@aspeneg.com
Cc: lboan9@juno.com
Subject: Saving our public lands

John Kalish/Billie Blanchard
CPU/BL
c/ Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear John Kalish and Billie Blanchard:

I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the *Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS)*. This is the only acceptable alternative and is clearly the Environmentally Preferred Alternative. The costs of this project to the environment are too great in comparison with any benefits, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project.

A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge.

Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42). Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well.

Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility

C18-1

Comment Set C18, cont.
Lola M. Boan

resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA.” An alternative to this proposed telecommunications site should have been considered. Again, no action is the only alternative that will keep this area from being degraded.

C18-1 cont.

The primary route is not an environmentally friendly route, but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project and to select the no action alternative.

This project has been in a near “finalized” form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to send power to California?

Non-development alternatives should be considered to meet California’s energy needs including significant energy efficiency and conservation programs and environmentally-friendly, renewable, and sustainable energy sources (i.e., solar, wind). Distributed solar energy and energy efficiency and conservation can reduce the need for additional transmission lines.

The environmental costs of this project are too high. The benefits of it are negligible. Please select the no action alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line.

Thank you for considering my comments.

Sincerely,

Lola Boan
11022 Canyon Creek Dr.
Sun City, AZ 85351

Responses to Comment Set C18 Lola M. Boan

- C18-1 The commenter’s preference for the No Project/No Action Alternative has been noted. Please refer to Comment Set B1 and General Responses GR-1, GR-2, and GR-3. Please refer to Response B5-6 and B8-17 for a discussion of the Harquahala Mountains.

Comment Set C19 Elna Otter

Devers–Palo Verde No. 2 Transmission Line Project

From: Elna Otter [otter@rnsmtc.com]
Sent: Thursday, August 10, 2006 2:46 PM
To: dpv2@aspeneg.com
Subject: Devers–Palo Verde No. 2 Transmission Line Project

Dear John Kalish and Billie Blanchard:

I would like to request that the Bureau of Land Management select the No Action/No Project Alternative for the Devers–Palo Verde No. 2 Transmission Line Project. Of the possibilities in the “Draft Environmental Impact Report/Environmental Impact Statement,” it is the only reasonable choice. I am tired of the attitude that desert land is waste land and not worth caring for and protecting.

C19-1

I know there is already one line there. That does not mean a second one would be OK. It would cut up the desert and detract from the refuge – both during and after construction.

C19-2

I understand that California has been “waiting for” this project for 15 years. They do seem to be doing fine without it. Particularly in a world where we need to cut down on carbon emissions and the populace is becoming engaged in using energy savings devices, the world, California, and particularly Arizona, does not need the project. Why can’t California develop carbon-neutral energy sources or at least its own energy sources?

C19-3

Please select the no action alternative for this project.

Thank you for considering my views.

Sincerely yours,

Elna Otter
5819 N. Cascabel Rd.
Benson, AZ 85602

Responses to Comment Set C19 Elna Otter

- C19-1 The commenter's preference for the No Project/No Action Alternative has been noted. The APMs for the DPV2 project are listed in Section B.5. The tables at the end of each issue area section (Sections D.2 to D.14) list all proposed mitigation measures and Section H (Mitigation Monitoring and Reporting) describes the procedure, authority, roles and responsibilities. These APMs and mitigation measures are designed to reduce potential impacts from the project to be less than significant.
- C19-2 In general, consolidating transmission lines within common utility corridors, as proposed with DPV2 adjacent to DPV1, is desirable because it minimizes land disturbance, reduces additional barriers to wildlife movement, and minimizes additional visual impacts that typically result from development from separate transmission line corridors. Please refer to General Response GR-1 for a discussion of why the route through Kofa NWR was deemed to be environmentally preferable.
- C19-3 The commenter's preference for the No Project/No Action Alternative has been noted. Please refer to Response B1-5 and General Responses GR-2 and GR-3 for a discussion of benefits to Arizona and why SCE states that the project is needed. See also Response B1-6 for a discussion of renewable resources and demand-side management alternatives.

Comment Set C20 R. Scott Jones

Devers–Palo Verde No. 2 Transmission Line Project

From: rscottjones@gmail.com on behalf of R. Scott Jones [scott@rscottjones.com]
Sent: Thursday, August 10, 2006 3:13 PM
To: dpv2@aspeneg.com
Subject: Please select the NO ACTION alternative on Devers-Palo Verde 2

John Kalish/Billie Blanchard
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Mr Kalish & Mr Blanchard:

I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS). This is the only acceptable alternative and is clearly the Environmentally Preferred Alternative. The costs of this project to the environment are too great in comparison with any benefits, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project.

A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge.

Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42). Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well.

Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA." An alternative to this proposed

C20-1

Comment Set C20, cont.
R. Scott Jones

telecommunications site should have been considered. Again, no action is the only alternative that will keep this area from being degraded.

The primary route is not an environmentally friendly route, but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project and to select the no action alternative.

This project has been in a near "finalized" form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to send power to California?

Non-development alternatives should be considered to meet California's energy needs including significant energy efficiency and conservation programs and environmentally-friendly, renewable, and sustainable energy sources (i.e., solar, wind). Distributed solar energy and energy efficiency and conservation can reduce the need for additional transmission lines.

The environmental costs of this project are too high. The benefits of it are negligible. Please select the no action alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line.

Thank you for considering my comments.

Sincerely,

R. Scott Jones
13840 N 34th Street
Phoenix, AZ 85032

C20-1 cont.

Responses to Comment Set C20

R. Scott Jones

- C20-1 The commenter’s preference for the No Project/No Action Alternative has been noted. Please refer to Comment Set B1 and General Responses GR-1 (Why though Kofa NWR), GR-2 (Arizona benefits), and GR-3 (Project need). Please refer to Response B5-6 and B8-17 for a discussion of the Harquahala Mountains.

Comment Set C21 Lynn Ashby

Devers–Palo Verde No. 2 Transmission Line Project

From: Lynn Ashby [plashby@msn.com]
Sent: Thursday, August 10, 2006 5:05 PM
To: dpv2@aspeneg.com
Subject: Devers-Palo Verde No. 2 Transmission Line Project

To Whom It May Concern:

Thank you for allowing me to express my vehement objection to the proposed Devers-Palo Verde No. 2 Transmission Line Project that Southern California Edison wants to construct across the Kofa National Wildlife Refuge. I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the *Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)*. The costs of this project to Arizona in terms of environmental degradation and increased electricity rates is totally unacceptable.

C21-1

Because the primary route for the DPV2 cuts through the Kofa Wilderness, it is unacceptable for several reasons. The right-of-way through the Kofa is prime desert bighorn sheep and desert tortoise habitat and a second power transmission line will fragment and reduce the quality and quantity of all habitats in the refuge. More than 400 acres of the refuge will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW. The resulting negative impact to plant resources will, in such an arid environment, last for a century or more. Major soil disturbances at each of the 85 tower sites during construction will promote establishment of invasive plant species, already a problem in Arizona. The wide corridor between the two ROW's, approximately 560 feet, will be an open invitation for illegal off-road vehicle use; again a problem for desert tortoises as ORV's are a significant factor in tortoise mortality. Lastly, when the Kofa Wilderness was created in 1990, after the first line was installed, it specifically excluded a right-of-way for a second line across the Kofa. Since this is the primary route proposed for the DPV2, it should not even be under consideration.

There is also the question of economic impact to Arizona's residents. Phoenix is the fifth largest city in the nation and is growing by thousands of people each year. The Palo Verde Nuclear Plant has been shut down several times in recent months and Arizona Public Service is seeking rate increases with alarming frequency. Recently, Southern California Edison decided to shut down the the Mohave Generating Station rather than make court-mandated improvements, so the utility must not be too concerned about its ability to meet California's energy demands. Non-development alternatives should be considered to meet California's energy needs including significant energy efficiency, energy conservation and environmentally sustainable energy sources.

C21-2

For the KOFA National Wildlife Refuge, and for Arizona, the environmental costs of this project are too high and the benefits are negligible. Please select the no action alternative

Sincerely,

Lynn Ashby
3748 E. Sheridan
Phoenix, AZ 85008
602-244-1144

Responses to Comment Set C21 Lynn Ashby

C21-1 The commenter’s preference for the No Project/No Action Alternative has been noted. Please refer to Responses B1-5 and B1-6.

Please refer to General Response GR-2 for a discussion of the benefits to Arizona. Arizona electricity rates are set by the Arizona Corporation Commission. The comment regarding increased electricity rates in Arizona is not within the scope of the environmental review under NEPA or CEQA.

The EIR/EIS team is not aware of a specific prohibition of a second line in Kofa NWR. The DPV2 project would not be installed within wilderness. See “Errata” letter from the Sierra Club (dated August 25, 2006) and presented at the end of Comment Set B8.

C21-2 The commenter’s preference for the No Project/No Action Alternative has been noted. Please refer to Response B1-5. As stated in Section A.2 (Purpose and Need for the Proposed Project), the DPV2 project is primarily driven by the need to provide additional high-voltage electrical transmission infrastructure to enhance competition among energy suppliers, and increase reliability of supply, which will enable California utilities to reduce energy costs to customers by about \$1.1 billion over the life of the project. Therefore, it is proposed as an economic project, not specifically a reliability project, although it would also serve that purpose.

Comment Set C22
Art Merrill

John Kalish & Billie Blanchard
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery St. St. 935
San Fransisco, CA 94104

I ask that BLM select the “No Action/No Project Alternative” option in the *Draft Environmental Impact Report/EIS for the Proposed Devers-Palo Verde No. 2 Transmission Line Project*. There can be no rational argument against the sure knowledge that a project of this scale will certainly and significantly harm the wilderness value of the KOFA Wildlife Refuge.

Aside from the 24 miles of industrial-looking power lines becoming a permanent mar on the viewscape, the 560-foot right-of-way will allow vehicles to damage already fragile desert habitat. The construction activity alone will certainly cause such harm that it would take decades for the affected habitat to recover. Worse, you know that OHVs will use the right-of-way, legally or not, disturbing wildlife and recreationers, gouging new paths off the ROW and out into the desert and creating new vectors for erosion.

You are familiar with the negative impacts listed in the draft report so I won’t quote them back to you ad nauseum. I hope that you will decide in the best interest of KOFA and its wildlife, and for the benefit of the greater whole of the public, not just a segment of it. The negative impacts of this project on all of the public outweigh the benefits that a few might enjoy from it. Please protect KOFA Wildlife Refuge by choosing “No Action.”

Thank you,

Art Merrill
412 W. Leroux St.
Prescott, AZ 86303

C22-1

Responses to Comment Set C22 Art Merrill

- C22-1 Please refer to Comment Set B1. The commenter's preference for the No Project/No Action Alternative has been noted.

Comment Set C23 Lon Stewart

Devers–Palo Verde No. 2 Transmission Line Project

From: Lon Stewart [afreeeagle@yahoo.com]
Sent: Friday, August 11, 2006 11:41 AM
To: dpv2@aspeneg.com
Subject: DPV2 comments

August 11, 2006

John Kalish and Billie Blanchard
CPUC/BLM
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: “No Action/No Project” Alternative
Devers-Palo Verde No. 2 Transmission Line

I am requesting that the Bureau of Land Management select the “No Action/No Project” Alternative as the best alternative to the Devers-Palo Verde No. 2 transmission line project as identified in the Draft Environmental Impact Report/Environmental Impact Statement for the project. The EIR/EIS clearly points out that the impact to the environment and the cost to the people of Arizona is much more than any benefits that will be derived from the project.

C23-1

Phoenix is the fifth largest city in the country and one of the fastest growing in the nation. The power generated by the APS power plants and others in the area will soon (one knowledgeable estimate at less than 5 years) be completely consumed by the Phoenix Metropolitan area. What benefit does a power line sending power out of the state serve?

Since December 2005, the Palo Verde Generating station has had issues with the reactors. Starting in December there was an issue with a vibrating valve in Unit 1 that took several months to repair while operating at reduced capacity. In June 2006, Unit 3 was down with maintenance issues. What will it be next month? Even if APS says everything is fixed and does not expect any more problems, you know there will be. This is a highly regulated, sophisticated, aging system that will inherently have more problems.

C23-2

The Phoenix metropolitan area has broken maximum electrical usage days in 12 of the past 13 years. In May 2006, I received notice in my APS electric bill that rates were going up 8% because APS was, among other things, purchasing power. Purchasing power? I thought Palo Verde, the largest nuclear generating station in the country, was the mother lode for supply of the Valley’s power. As an electrical consumer my rates will increase even more if APS cannot meet its contract obligations to sell electricity to Southern California Edison (SCE) using power from Palo Verde. And APS is still trying for an additional rate increase with the Arizona Corporation Commission (ACC).

In June 2006 the Western Governor’s Association committed to take action to bring on line substantially more clean and diversified energy resources and improve energy efficiency. If the governors of Arizona and California are working together to create renewable energy, why should we allow SCE to build a power line to tap into non-renewable sources of power generated by natural gas, coal, and nuclear and thus undermine the intent of what the governors are trying to do? The Draft EIR/EIS (ES-52) clearly states that this project will increase the air pollution of Arizona. No thank you, Arizona has enough problems meeting federal air attainment standards, why should Arizona be asked to create the pollution

C23-3

Comment Set C23, cont. Lon Stewart

but send the power out of state?

C23-3 cont.

The Devers Palo Verde No. 2 line was conceived 25 years ago and was permitted 15 years ago. California has managed without this line for all these years. If power was so crucial to southern California, SCE, as the operator of the Mohave Generating Station, could have elected to install emission controls on the plant. Instead, SCE chose the other option and elected to shut it down as per a Court Order on January 1, 2006. If power were so desperately needed in California, SCE would have elected to install the emission controls. Therefore it does not appear as though the DPV2 line is needed as much as SCE implies.

C23-4

On page ES-2 of the Executive Summary, it is stated, “this project is designed to provide economic benefits and is not primarily a reliability enhancement.” The land, animals, and people of Arizona should not have a lesser quality of life so that SCE can improve their economic benefit. This simply is not fair to Arizona.

The EIR/EIS does not provide sufficient study to the impact of fauna in the path of the DPV 2 route. There are some small and fragile colonies of desert tortoises and desert big horn sheep in the KOFA National Wildlife Refuge. The construction of the project cutting across the habitat could significantly endanger the population of these local animals. The smaller animals are more in danger as the two parallel rights of ways are nearly 600 feet wide. That is a long way for a slow moving tortoise to hide from a predator. What other animals will be affected that were not addressed in the EIR/EIS?

C23-5

The construction of the project will introduce invasive plant species that are making the desert of Arizona more susceptible to wildfire and total destruction of native plants that cannot withstand fire.

C23-6

Even though right of way roadways are established, construction crews will still wander off of these, especially at the tower construction sites, further widening the area of destruction and establishing area for more invasive plant species.

C23-7

The addition of DPV 2 would increase the probability for off road vehicles to enter the KOFA Wilderness Area and destroy the natural habitat along with creating erosion issues. Even with fences or roadblocks, people are still determined to go beyond the barrier and enter these areas.

C23-8

SCE should be supporting the Million Solar Roofs Initiative of California along with significant energy conservation and energy efficiency programs. The same amount of money spent on environmentally friendly renewable or sustainable energy sources would most likely be less than the cost of construction of transmission lines. Local power generating facilities would not need to be as large as those in Arizona simply through the transmission line losses transporting across Arizona and California. The cost of electrical generation from wind and solar energy generating facilities is comparable to conventional pollution generating facilities. Renewable energy facilities built in California for Californians appears to be a more sound economic approach and complies with the commitment of the governors of our two states.

C23-9

The only benefit of the DPV-2 transmission line appears to be in the pocket book of SCE. Please select the “No Action” alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line, the air of Arizona, the great views of Arizona, and the pocketbooks of the citizens of Arizona.

C23-10

Respectfully submitted,

Lon Stewart
102 E Kaler Dr.
Phoenix, AZ 85020

Responses to Comment Set C23 Lon Stewart

- C23-1 The commenter's preference for the No Project/No Action Alternative has been noted. Please refer to Response B1-5 and General Response GR-2 for a discussion of project benefits to Arizona.
- C23-2 Arizona electricity rates are set by the Arizona Corporation Commission, and the ACC will consider the need for electricity to be consumed within Arizona when it makes its decision on the DPV2 project (expected in November 2006). The comments regarding increased electricity rates in Arizona are not within the scope of the environmental review under NEPA or CEQA. Note that there are many gas-fired generation facilities in the Palo Verde area, in addition to the Palo Verde Nuclear Generating Station.
- C23-3 Please see Response B1-6 for a discussion of renewable resources and demand-side management alternatives.
- Air quality impacts for the DPV2 project are addressed in Section D.11.4. Specifically, the Maricopa County Air Quality Department and the Air Quality Division of Arizona Department of Environmental Quality jurisdictional impacts are discussed in Section D.11.4.1 and Section D.11.4.2, respectively.
- C23-4 Please refer to General Response GR-2 for a discussion of project benefits to Arizona and Response C21-2 regarding project objectives.
- C23-5 Please refer to Response B1-2 and B1-3. The following impacts discussed in Section D.2 (Biological Resources) address direct and indirect impacts to fauna: Impact B-4 (Construction activities and increased vehicular traffic on access roads would result in disturbance to wild-life species); Impact B-5 (Construction activities during the breeding season would result in a potential loss of nesting birds); Impact B-7 (Construction activities would result in indirect or direct loss of listed wildlife or habitat); Impact B-8 (Construction activities would result in indirect or direct loss of individuals, or a direct loss of habitat for sensitive plants); Impact B-9 (Construction activities would result in indirect or direct loss of individuals, or a direct loss of habitat for sensitive wildlife); Impact B-11 (Construction activities would result in adverse effects to the movement of fish, wildlife movement corridors, or native wildlife nursery sites); Impact B-12 (Construction activities would result in adverse effects to linkages and wildlife movement corridors); Impact B-14 (Operation of the transmission line may result in electro-cution of listed bird species); Impact B-15 (Operation of the transmission line may result in collisions by listed bird species); Impact B-16 (Operation of the transmission line may result in increased predation of listed and sensitive wildlife species by ravens that nest on transmission towers); and Impact B-17 (Wildlife mortality resulting from traffic on access roads).
- C23-6 Please refer to Response C11-6 for a discussion of fire related to transmission lines.
- C23-7 See Response B1-3. Because the Proposed Project would be located in an existing corridor, existing access roads would be used to the maximum extent feasible. Loss of vegetation is addressed in Section D.2 (Biological Resources), and specifically Impact B-1 (Construction activities would result in temporary and permanent loss of native vegetation), Impact B-6 (Construction activities would result in indirect or direct loss of listed plants), and Impact

- B-8 (Construction activities would result in indirect or direct loss of individuals or a direct loss of habitat for sensitive plants) address the disturbance of vegetation and would be reduced to less than significant levels with the implementation of Mitigation Measures B-1a (Prepare and implement a Habitat Restoration/Compensation Plan), B-6a (Develop a transplanting plan), and B-8a (Conduct surveys for listed plant species).
- C23-8 Please see Response B1-4. Erosion and soils are discussed in Section D.13 (see Impact G-1, Construction could accelerate erosion).
- C23-9 Please see Response B1-6 regarding renewable technologies, such as solar power, and Response B8-4 regarding the New Conventional Generation Alternative. In addition, Distributed Generation is analyzed in Section 4.5.4 in Appendix 1 of the Draft EIR/EIS.
- C23-10 The commenter’s preference for the No Project/No Action Alternative has been noted. Please refer to Response B1-5 and General Response GR-2 for a discussion of project benefits to Arizona.

Comment Set C24
Jen Leitch

Devers–Palo Verde No. 2 Transmission Line Project

From: Jen Leitch [jen.leitch@hotmail.com]
Sent: Friday, August 11, 2006 1:39 PM
To: dpv2@aspenerg.com
Subject: Devers–Palo Verde No. 2 Transmission Line Project (DPV2)

August 11, 2006

John Kalish/Billie Blanchard
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Professionals:

I am writing to express my concern with and opposition to Southern California Edison's Devers–Palo Verde No. 2 Transmission Line Project (DPV2) project and to urge the BLM to select the No Action/No Project Alternative identified in the Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS).

C24-1

I have recreated in both KOFA National wildlife Refuge and the Harquahala wilderness and both are amazing places. There is no way that the proposed project can be mitigated to point where it will not damage wildlife habitat, views, and undeveloped desert landscape that currently exists. Why bother to set aside land for wildlife and wilderness if those uses can be trumped for utilities? Moreover, I don't know why Arizona should be shipping power to California. Arizona continues to grow at an extremely speedy rate, and the power generated here will be needed for Arizona uses within the near future. (Many of those who move here are from California.) My concern is that this transmission line will be used for a relatively short period of time not commensurate with the destruction it will cause to Arizona desert landscape. Once this damage is done, the land will not be restored. There is no reason for California's power to be made in Arizona.

C24-2

Please do not allow Arizona to become a "utility closet" for California. Let California manage their own energy generation needs without damage to Arizona's deserts and desert wildlife. Thank you for your consideration of these comments.

Sincerely,

Jennifer Leitch
10109 S. 29th Dr.
Laveen, AZ 85339

Responses to Comment Set C24 Jen Leitch

- C24-1 The commenter's preference for the No Project/No Action Alternative has been noted. Please refer to Comment B1-2 and General Responses GR-1 for a discussion of why the proposed route through Kofa NWR was found to be environmentally preferable. Please refer to Response B5-6 and B8-17 for a discussion of the Harquahala Mountains.
- C24-2 Please refer to General Response GR-2 and GR-3 for a discussion of project benefits to Arizona and project need, respectively. See also Response B1-5.

Comment Set C25 Paul Franckowiak

Devers–Palo Verde No. 2 Transmission Line Project

From: Jenni And Paul [paulandjenni@hotmail.com]
Sent: Friday, August 11, 2006 1:49 PM
To: dpv2@aspenerg.com
Subject: Against Devers–Palo Verde No. 2 Transmission Line Project (DPV2)

Planners-

I am writing to include my comments AGAINST the proposed power line route (Devers–Palo Verde No. 2 Transmission Line Project (DPV2)). I would like if you selected the no action option as this is the only one that preserves the environment and prevents my having to subsidize a private business's efforts to enrich themselves at the expense of sheep, tortoises, and the general public. Why socialize the expense of the project and privatize the profits. It seems to me the power company can buy the land it needs to run a transmission line or use an existing route to run the electricity. Why not have them follow the freeway? Better yet, why not take no action and allow California generate their own power by eco-friendly means. They seem to love doing that sort of thing anyway.

C25-1

C25-2

Pretend that I am a congressional lobbyist here for a moment. It sounds to me like the initial proposal was the work of a congressional lobbyist and it is only fair if you let me respond to the proposal as a lobbyist. As a lobbyist, I must present the following information:

C25-3

Hello influential decision maker. I heard that someone spoke with you about making money for the power company. They need a bunch of desert land and they are going to be very rich. Of course, they will owe you a favor and they can pay you back once you leave office. We all know that rich guys can pay back favors. All they need is some of the public's shared resources for free.

Well I am here to say that you should not give them the land. Rich guys can buy their own land. I am a lobbyist and I know. I was driving the I-10 corridor the other day and....,

oh gosh, you didn't realize that there was a freeway that ran between Phoenix and California?

Good news, we may have a win/win solution here. If we run the lines along the Freeway and keep them out of the KOFA and Harquahala Mountain natural areas or do not build them at all, we will be better off.

See my main issue is that as a lobbyist for the public, my vote counts as equal to all the other lobbyists, I want the interests of the general public represented here before we go out and eat shrimp and hit golf balls off of the bellies of beautiful women. Maybe after that we can have a money fight and then go drinking. As long as we first serve the interests of the general public, people will not mind what else happens. The public is not best served by the destruction that this project will cause and I suggest that we opt for the no build option.

Paul Franckowiak
Public Lobbyist
10109 S. 29th Drive
Laveen, Az. 85339
(602) 237-1758

Responses to Comment Set C25 Paul Franckowiak

- C25-1 The commenter's preference for the No Project/No Action Alternative has been noted. Please see General Response GR-1 for a discussion of why the route through Kofa NWR was chosen as the preferred route. Several potential alternatives in the area north of Kofa NWR and in the vicinity of Interstate 10 were evaluated during preparation of the EIR/EIS and are documented in Appendix 1. They were eliminated from consideration in this EIR/EIS, as well as in several of the past documents relating to the DPV1 and DPV2 projects:
- DPV2 2005 PEA (as Subalternate 1: North of Kofa NWR, South of I-10 Alternative)
 - DPV1 1978 EIS (as Brenda Route Alternative)
 - DPV2 1985 PEA and 1988 Amended PEA (as Subalternate 1)
 - DPV2 Supplemental EIS (as Northern Alternative 2 Alternative).
- C25-2 Please refer to Response B1-6 for a discussion of renewable technologies and energy efficiency.
- C25-3 Please refer to Response C25-1.

Comment Set C26
Lynn DeMuth

Devers–Palo Verde No. 2 Transmission Line Project

From: Lynn DeMuth [lmdemuth@cox.net]
Sent: Friday, August 11, 2006 2:52 PM
To: dpv2@aspeneq.com
Subject: Line siting through KOFA NWR

Attn: John Kalish and Billie Blanchard

I am writing to request that the Bureau of Land Management select the No Action/No Project Alternative identified in the *Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project (EIR/EIS)*. This is the only acceptable alternative and is clearly the Environmentally Preferred Alternative. This area is prime habitat for several endangered and threatened wildlife species and the impact of the line siting cannot be mitigated. This includes during and after construction.

Lynn DeMuth
2961 W. Comstock Drive
Chandler, AZ 85224

C26-1

Responses to Comment Set C26 Lynn DeMuth

C26-1 The commenter's preference for the No Project/No Action Alternative has been noted. Please refer to EIR/EIS Section E for a comparison of alternatives and a comparison of the Environmentally Superior/Preferred Alternative to the No Project/No Action Alternative.

All 13 environmental issue areas (see Sections D.2 through D.14) discuss the impacts of the proposed DPV2 transmission line through the Kofa National Wildlife Refuge NWR. The EIR/EIS identifies significant and unmitigable impacts to recreation and wilderness, as well as in visual resources. Section D.2 (Biological Resources) addresses the temporary and permanent biological issues, as well as the consistency of the Proposed Project with the policies and the mission of Kofa NWR. Please refer to General Response GR-1 for a discussion of why the proposed route in an existing corridor through the NWR was found to be the environmentally preferable alternative.

Comment Set C27
Jon Findley

1030 E. Baseline Rd., # 105-987
Tempe, Arizona 85283
August 10, 2006

CPUC and BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Sirs:

I have been following the proposed plans for the Devers–Palo Verde No. 2 Transmission Line Project for more than a year now. I have attended public events in Phoenix and Tonopah, Arizona. I have visited the affected area in the KOFA National Wildlife Refuge. I have conferred with those more knowledgeable than I about the biological and environmental effects of the project in the right of way (ROW) and it's surrounding area. It is my considered opinion that the *Draft Environmental Impact Report/Environmental Impact Statement* is flawed and inadequate. The only acceptable conclusion that can be justified is that the responsible agencies select the No Action/No Project Alternative.

C27-1

The first obvious fault is in the “Proposed Project Purposes and Need” (Draft EIR/EIS, page ES-2, May 2006), that states that a major objective is to: “Provide Increased Reliability, Insurance Value, and Operation Flexibility.” The text of this section states that: “...the project is designed to provide economic benefit and is not primarily a reliability enhancement project...” This statement, along with readily available, industry-wide technology to improve transmission reliability with little or no environmental impact, should eliminate this as an acceptable objective.

A second objective in that section is to: “Support the Energy Market in the Southwest.” There are vague references to power outages and “natural disasters” but nowhere is there any evidence that increased capacity along this one ROW could ever avert known events better than improvements in Demand-Side Management (DSM), Distributed Generation (DG), increased in-state generation, consumer efficiency and conservation measures, and other initiatives that would have little or no environmental impact.

C27-2

This leaves only objectives that make electric power cheaper for Californians to the detriment of the people of Arizona. Therefore, the decision weighs on comparing the cost advantage and some environmental degradation along the California portion of the ROW with the very probably increased electricity rates in Arizona and immediate and long-term environmental effects that have not been adequately analyzed in places like the KOFA National Wildlife Refuge and the Harquahala Valley. It is clear that Southern California Edison (SCE) is the only real benefactor from this project and it is not even clear that they are obligated to pass any benefit on to their ratepayers.

C27-3

The Environmentally Preferred Alternative described in the Draft EIR/EIS is not acceptable. The cost of this project to the environment is too great when compared to any benefit that will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project.

A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The ROW through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge. The width of the new corridor would eliminate necessary ground cover and protection needed by some species to traverse this area, making a boundary limiting their domain and making them vulnerable to prey if they try to cross the ROW.

C27-4

Comment Set C27, cont.
Jon Findley

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

C27-5

During my recent visit to the KOFA, I was able to experience first hand the impact of the existing transmission lines. The visual impact is great and the corona noise from the lines is quite noticeable. The doubling of these effects on refuge areas is unacceptable. While no standards exist for EMF related to transmission lines, these fields do exist and are deeply troubling to anyone concerned with the long-term health effects on human and natural populations.

C27-6

The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the Draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA." Yet no alternative to this proposed telecommunications site was included. Again, no action is the only alternative that will keep this area from being degraded.

C27-7

Additionally, the Draft EIR/EIS fails to incorporate the real costs of the expansion of transmission capacity. By their own testimony, SCE has indicated that construction of this additional transmission capacity would encourage building of conventional and non-conventional generation capacity in Arizona and adjoining states. It is well established that the cost of power passed on to ratepayers does not include the "external" costs related to pollution of the air, dramatically increased water use, land-value loss, disruptions and impacts associated with construction, and other environmental impacts. These impacts would be borne by Arizona and other states, not the residents of California.

C27-8

Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical power to export to California or any other area. If SCE wants to take advantage of power generated by coal-burning power plants in such far flung places as Wyoming, Montana, and Idaho, it should do so directly and not try to circumvent the state's own regulations by encouraging Arizona to import the dirty power from coal-burning plants and export our current generation capacity from nuclear and gas sources to California.

C27-9

Non-development alternatives should be considered to meet California's energy needs including significant energy efficiency and conservation programs and environmentally-friendly, renewable, and sustainable energy sources (e.g., solar, wind, and geo-thermal). Reduced consumption along with distributed generation would reduce the need for additional transmission lines and increase the reliability of existing infrastructure.

C27-10

The environmental costs of this project are too high. The benefits of it are negligible. If the true cost and impact of the supposed Environmentally Preferred Alternative were actually compared to the No Action/No Project Alternative, only one decision could be made; the proposed transmission line should not be built in any configuration.

Thank you for this opportunity to participate in this important process.

Sincerely yours,



Jon Findley

Responses to Comment Set C27 Jon Findley

- C27-1 The objectives presented in the EIR/EIS are those stated by the applicant, SCE. The EIR/EIS does not make a judgment on SCE's statement regarding the need for the DPV2 Project. That decision will be made by decisionmakers at the Arizona Corporation Commission, as well as the CPUC and BLM. Please refer to General Response GR-3 for a discussion of project need.
- C27-2 Please see Response B1-6 regarding renewable generation technologies and demand-side management, as well as Response B8-4 regarding the New Conventional Generation Alternative. In addition, Distributed Generation is analyzed in Section 4.5.4 in Appendix 1 of the Draft EIR/EIS.
- C27-3 The commenter's preference for the No Project/No Action Alternative has been noted. Please refer to Response B1-5 and General Response GR-2 for a discussion of project benefits to Arizona. Arizona electricity rates are set by the Arizona Corporation Commission. The comments regarding increased electricity rates in Arizona or operation at Palo Verde Nuclear Generating Station are not within the scope of the environmental review under NEPA or CEQA, but will likely be considered by the ACC in its decision on the DPV2 project.
- C27-4 Please refer to Response B1-2 and B1-3 regarding the value of the Kofa NWR and biological resources impacts that would result from installation of an additional transmission line.
- C27-5 Please refer to Response B1-4 regarding impacts to vegetation from construction and the potential for establishment of invasive plant species.
- C27-6 Visual impacts in Kofa NWR are addressed in Section D.3.6.2 of the Draft EIR/EIS. As stated in the Draft EIR/EIS (Impact V-7), the proposed route would create significant and unmitigable (Class I) impacts to visual resources in Kofa NWR.
- See also Response B8-19 regarding corona noise.
- C27-7 Please refer to Response B5-6 regarding Harquahala Mountain.
- C27-8 Please refer to General Responses GR-2 and GR-3 for a discussion of benefits to Arizona and project need. The CPUC Administrative Law Judge is evaluating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporations Commission will also be addressing project need in its own proceeding. See also Response B3-4.
- C27-9 The availability of generation resources in Arizona will likely be considered by the ACC in its proceeding on the DPV2 project. Please refer to Response B8-4 for a discussion of the New Conventional Generation Alternative, which could include coal power. Use of coal power directly from Wyoming, Montana, or Idaho would require the construction of transmission lines that would be much longer than the Proposed Project and would thus create much greater both temporary construction and permanent operational environmental impacts.
- C27-10 See Response C27-2. The commenter's preference for the No Project/No Action Alternative has been noted.

Comment Set C28
Ken G. Sweat

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, Ca 94104

Dear CPUC/BLM:

I am writing you to comment on the Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers–Palo Verde No. 2 Transmission Line Project. I am seriously concerned that the process used to create this document was not in compliance with regulatory standards. Also, the analysis of the impact on the environment was lacking critical data. Further, the mitigation measures proposed will not prevent significant negative impacts to the environment.

C28-1

The process used in this document ignores the intent of the National Environmental Policy Act (NEPA). NEPA requires that the project and alternatives to the project be examined in detail. This document only presents alternatives to segments of the transmission line, not the entire project. Such a strategy contravenes the intent of NEPA, and suggests that several EIS documents are necessary for each of the segments of the project.

The most glaring overall fault of the analysis is found throughout the document. Repeatedly, the document calls for the mitigation measures used for the first transmission line, and simply states they will be sufficient to achieve no significant impact. Yet nowhere is there any data cited from the first transmission line that any of the mitigation measures were effective, or even complied with. The closest information presented are pictures of segments of the line, with a projection of how the new lines would appear. Yet even these photos are deceptive, as they are taken from angles that obstruct a view of the line right of way, and they fail to show the ‘temporary’ damage that construction activities will inflict. Since arid ecosystems in general and particularly deserts are slow to recover from disturbance, this ‘temporary’ damage is not insignificant. For species of concern such as the big horn sheep, desert tortoise and others, no data is presented on any impacts of the first transmission lines. Without this, there is no reason to suspect that there will be no serious impact to wildlife.

C28-2

C28-3

Certainly, there is a large body of research that suggests that the impacts will not be trivial. Studies conducted by researchers at ASU have demonstrated that relocations of venomous reptiles such as rattlesnakes and Gila monsters induce incredibly high mortality rates. My personal experience is that many reptiles, especially desert tortoise, are quite territorial, and most reptiles that are moved simply outside of the construction area will be back, and again in jeopardy. Other studies by researchers at the Sonoran Desert Museum have demonstrated that less than ten percent of saguaros that are transplanted are actually successful in the long term. Relocation of burrowing owls is almost completely unsuccessful unless certain acclimation techniques are used-yet the mitigation measures do not specify this, only that passive techniques will be used at some point to drive the birds away. Given that most research would not support a lack of

Comment Set C28, cont.
Ken G. Sweat

serious impact to flora and fauna, this project should openly state in the document that it is likely to cause significant detrimental impacts to the natural environment.

C28-3 cont.

Other impacts to wildlife are simply ignored. Research suggests that large motor vehicles can be misinterpreted as monsoon storms in the late summer by aestivating amphibians, causing them to dig to the surface and spend energy when no water is available. Construction in the late summer could jeopardize many native amphibians that rely or vernal water sources.

C28-4

Impacts to plants and other photosynthetic organisms are also insufficiently analyzed. The document claims that the increased dust from construction would not be harmful to plants, since they are adapted to a desert which has large amounts of dust. This is an incorrect assumption about desert environments. Desert soils are stabilized by both abiotic and biotic crusts, which recent research conducted throughout the southwest suggests are essential to soil stabilization and minimize dust in undisturbed desert environments. Disturbance of these fragile soil crusts will result in large increases in fugitive dusts, which can only harm productivity of light dependent organisms, both plant and the cyanobacteria, algae and lichens that are the primary producers in biotic soil crust communities. The mitigation measures of using mats to stabilize abiotic crusts (desert pavement) are interesting, yet no data is presented that would support the idea that this would be effective. This incorrect analysis of dust levels in native desert environments conceals significant impacts that are probable to both soils and biological resources.

C28-5

The final fault of this project is in its economic efficiency. Simply put, in terms of energy used, it is less efficient to generate electricity in areas distant from where it is being consumed. This project would subject Arizona utility customers to competition from California consumers, where prices are higher. The document admits as much, and indeed this appears to be the only real justification for the transmission line-so that Southern California Edison can sell cheaper power, while subjecting the residents of Arizona to more pollution than would be produced if the power were generated local to the consumers.

C28-6

Future economic consequences are also not examined appropriately. Over time, it is inevitable that there would be increases in Arizona utility rates, thus negatively impacting Arizona residents, especially those of lower incomes.

For these reasons, I would strongly recommend that you reject the analysis in this document as insufficient and incorrect, and the transmission line as unnecessary and not in the best interests of the BLM, the CPUC or the American people.

Sincerely,


Ken G. Sweat,
602.674.0679
312 East Butler Drive
Phoenix, Az 85020

Responses to Comment Set C28 Ken G. Sweat

C28-1 Section 2.2 in Appendix 1 in the Draft EIR/EIS describes the CEQA and NEPA requirements for alternatives. NEPA’s Forty Questions No. 5b states that “Section 1502.14(b) specifically requires ‘substantial treatment’ in the EIS of each alternative including the proposed action. This regulation does not dictate an amount of information to be provided but rather, prescribes a level of treatment, which may in turn require varying amounts of information, to enable a reviewer to evaluate and compare alternatives.” NEPA does not specifically require that alternatives to the entire project be considered, aside from the required consideration of the No Project/No Action Alternative. However, note that a wide range of alternatives was considered, as documented in EIR/EIS Appendix 1, Alternatives Screening Report. Please refer to Responses B6-1, B6-2, and B6-5.

C28-2 The mitigation measures recommended for the DPV2 Project are based on current scientific knowledge, experience of the EIR/EIS team, and resource agency practice. They do not rely on DPV1 mitigation measures. The EIR/EIS also presents the measures that were included in SCE’s Proponent’s Environmental Assessment, such as provisions of BLM’s original permit for the DPV2 ROW (issued at the time the project was originally approved). However, in every case, the older measures [that were resubmitted as Applicant Proposed Measures in this EIR/EIS](#) were assessed for their ability to effectively reduce impacts, and if they were not considered to be effective, additional mitigation was presented. Please also refer to Response B6-2 regarding the general approach to mitigation [and Response B3-23 regarding a discussion of the DPV1 project](#).

Please see responses to Comment Set E5 regarding visual impacts of the project in the Kofa NWR and the methodology used for visual impact assessment.

C28-3 Implementation of pre-construction surveys and monitoring during construction activities have been included as part of the project in order to identify the locations of sensitive and/or common species of wildlife that may be affected by the project. Avoidance of take of individuals of sensitive and/or listed species has been incorporated with these pre-construction surveys and monitoring. The locations of individuals will be identified during these surveys and through monitoring during the construction process. The goal of the measures is to avoid effects on these individuals, if possible. If avoidance is not possible, then individual animals may be relocated out of harm’s way. Considering the small size of the impact areas for most of the project components (individual transmission towers spaced at approximately 1,500-foot intervals), these individuals would only be relocated a short distance away from the construction zone.

The actual impact areas where ground disturbance would occur for each of the project components are relatively small considering the vast scope of this project and availability of adjacent habitat. Section B.2.2 (Table B-2) provides estimates of the potential disturbance for each of the Proposed Project components. The estimated area of temporary impact for each tower removal is 0.06 acres and the estimated area of permanent impact for each new tower installation is 0.29 acres. The estimated area of permanent impact for each new spur road (which will be constructed at 25 percent of new tower sites) is 14 feet wide by 200 feet long. The estimated temporary impact area for pulling and/or mile pulling/splicing site is approximately 0.6 acres. In those areas where the impacts are temporary, any animals that have been moved out of the construction zone would be able to move back into the areas after con-

struction is completed and after the restoration effort has begun. Qualified biologists, who are familiar with the species in question and with experience in the relocation of these species, would be utilized to conduct the surveys, relocation, and monitoring.

C28-4 Section D.2.2 of the biological resources environmental setting identifies that there is the potential for sensitive amphibians to be present in the Proposed Project area. However, as stated in that section, much of the project would be constructed in desert areas where there are limited existing water sources and there is a low potential to support amphibians. In areas that have a higher potential to support amphibians that require seasonal pools for reproduction, the implementation of APM B-16 (Conduct Pre-construction Surveys) would reduce potential impacts to less than significant levels. Likewise, the roads that would be utilized during construction of the project are existing roads that are routinely accessed by various types of off-highway vehicles. The short-term use of the roads by equipment associated with project construction is not expected to create a significant increase in mortality of amphibians, if they are found to be present.

C28-5 Please refer to Response A8-5. Disturbance of desert soils for new construction may have an impact on abiotic and biotic crusts if they occur in the areas where construction is scheduled to occur. As identified in Response C28-3, the area of ground disturbance for each of the areas that will be temporarily and permanently affected by construction are relatively small compared to the large extent of habitat in the geographic area. APM B-19 (Section D.2.5.2, Table D.2-6) and Mitigation Measure B-1a (Section D.2.6.1.1) require the preparation and implementation of a habitat restoration plan for all areas disturbed by construction.

C28-6 Please refer to General Responses GR-2 and GR-3 for a discussion of benefits to Arizona and project need. The CPUC Administrative Law Judge is evaluating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporations Commission in a separate proceeding will also be addressing project need. See also Response B3-4 regarding economic issues.

Please see Response B8-4 regarding the New Conventional Generation Alternative. In addition, Distributed Generation is analyzed in Section 4.5.4 in Appendix 1 of the Draft EIR/EIS. Environmental Justice is discussed in G.1 of the Draft EIR/EIS. Arizona electricity rates are set by the Arizona Corporation Commission. The comments regarding increased electricity rates in Arizona are not within the scope of the environmental review under NEPA or CEQA, but are within the jurisdiction of the ACC.

The commenter's opposition to the Proposed Project has been noted.