



San Bernardino Valley Audubon Society

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Frank McMenimen, BLM Project Manager
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SUBJECT: Notice of Intent to Prepare a Joint Environmental Impact Statement and Environmental Impact Report for the West of Devers Upgrade Project, Riverside and San Bernardino Counties, CA

Dear Mr. McMenimen,

Thank you for the opportunity to comment on the Notice of Preparation for the SCE West of Devers Upgrade Project (WOD) on behalf of the San Bernardino Valley Audubon Society (SBVAS). This letter is a follow-up to the oral testimony I gave at the July 16, 2014 scoping meeting in Banning and conversations after the meeting with Frank McMenimen of BLM and Susan Lee of Aspen Environmental Group.

It is our understanding that because the upgrade will follow the existing right-of-ways and will be replacing existing towers, environmental impacts are likely to be construction-related rather than long-term. While the power line has existed for some years, it has likely had some impacts, both positive and negative, in the form of providing nesting structures for Common Ravens, Red-tailed Hawks, and Golden Eagles. All three species as well as their prey species have been locally affected by the nesting on the transmission towers.

The current drought, especially in the context of global warming and the long-term increased aridity of the western United States, have changed the ecological status quo enough that the WOD Upgrade Project should analyze the effects of the transmission lines in the context of this new biological reality. Increased urban development since the original transmission lines were constructed has also changed the existing environmental conditions in the vicinity of the WOD Upgrade Project. We therefore believe that the BLM must require NEPA and CEQA environmental reviews to analyze the long-term ecological effects of the transmission tower nesting of Common Raven in the context of changing land use patterns and an increased vulnerability of prey species due to population stresses from global warming. The environmental review must also examine past and present population levels of Golden Eagles and Red-tailed Hawks, as related to the relative importance of transmission towers for nesting structures, changing environmental conditions, and electrocution deaths from transmission lines.

Our context for this request is our concern for predation by Common Ravens on various species, and the contribution of transmission lines such as WOD to raven nesting. The environmental analysis should look at the potential impacts of utilizing monopoles instead of lattice towers in areas where Common Ravens could be impacting vulnerable species.

Ravens are known predators of hatchling Desert Tortoises, which are found in Segment 6 of WOD. While many other lattice structures exist here in the form of the older wind turbines, SCE conversion to monopoles might still have a beneficial effect by reducing raven populations. The analysis should also discuss the feasibility of removing raven nests from lattice-type towers as a way to keep raven populations low.

We are also concerned about potential raven predation on Tricolored Blackbirds (TRBL) in San Timoteo Canyon, Segments 3 and 4. Robert Meese, the manager of the Tricolored Blackbird Portal and Statewide TRBL surveys, has informed us that there are documented cases of ravens decimating Tricolored Blackbird nesting colonies on an opportunistic basis. There is an existing TRBL colony at Fisherman's Retreat, a private fishing and camping retreat in San Timoteo Canyon in Segment 3 of the WOD Upgrade Project. We (SBVAS) in conjunction with the Riverside Land Conservancy (RLC) are planning to construct a pond and other TRBL habitat enhancements just north of the El Casco substation inside the "split" section of the WOD project, between the north and south branches of Segment 4. Tricolored Blackbird populations are at an historic low, attributed to drought and climate change reducing insect prey availability, avian predation of nesting sites, an increase in urban development and other factors. Populations of TRBL are so low that the California Fish and Game Commission is considering an emergency listing of it as an Endangered Species at their August 6, 2014 meeting. SBVAS is undertaking the habitat enhancement at the RLC Reserve because of our deep concern over the future of this species.

Several questions need to be addressed in the environmental reports: If conversion to monopoles could reduce overall raven numbers in San Timoteo Canyon, which specific towers should be monopole? Only those directly next to the RLC Reserve and Fisherman's Retreat, or should monopoles be used further away as well? Will the use of monopoles negatively affect Golden Eagle nesting in San Timoteo Canyon? It is our understanding that there is, or was, a Golden Eagle nest on a transmission tower in San Timoteo Canyon.

We also look forward to environmental analysis of subtransmission and distribution lines that connect to the WOD lines that may need to be upgraded. Are subtransmission towers of the lattice type, and could they foster raven nesting? Do subtransmission and distribution poles pose an electrocution risk to raptors, particularly Golden Eagles, and if so, can this impact be ameliorated by the installation of perch protectors? How much has the Golden Eagle population been reduced in the last several decades due to electrocutions, loss of habitat, loss of prey from drought and climate change and other factors?

We trust that the Joint Environmental Impact Statement and Environmental Impact Report will fully analyze the environmental impacts of the construction of the WOD Upgrade Project. We have noticed however, that other private development projects have ignored or minimized impacts to sensitive species, particularly reptiles and amphibians. For this reason, we urge SCE, BLM and Aspen Environmental to do an exemplary job of analyzing impact to sensitive species, in particular, Orange-throated Whiptail, Ring-necked Snake, Legless Lizard, and Red Diamond Rattlesnake. As a long-time resident of Grand Terrace, I have encountered all four species over the years along and near Segment 2, and they probably occur in San Timoteo Canyon as well.

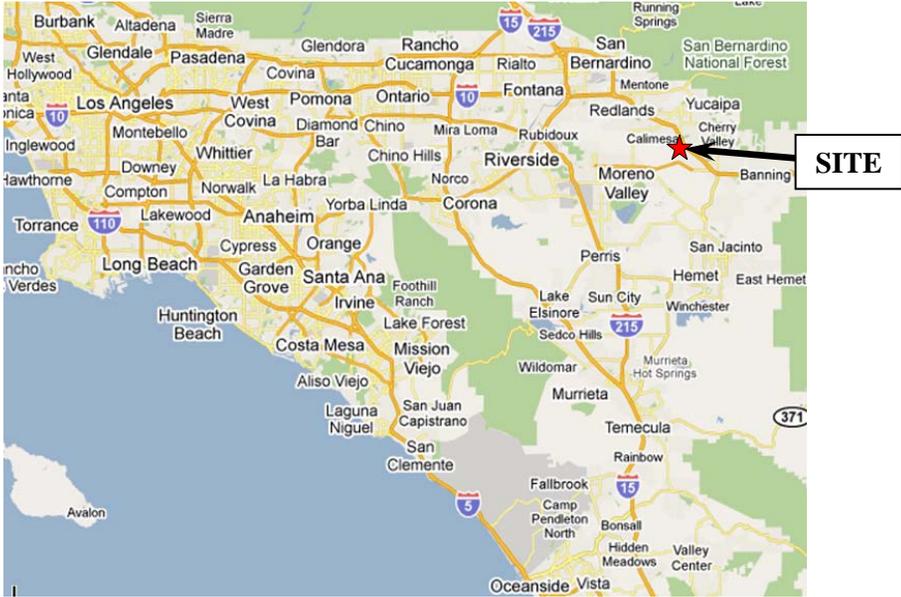
Populations of all these species are probably low due to the effects of climate change, making any incidental mortality from construction less likely, but if it occurs, more devastating. Please consider the feasibility of trapping and relocating these species prior to construction. Standard clearing efforts may not be effective, given that these species are either fossorial or quickly retreat to shelter when threatened and may not be detected.

We also trust that there will be detailed and effective re-vegetation plans for construction-related disturbance that emphasize using native vegetation. Soil disturbance has been a major factor in the widespread conversion of sage scrub to non-native grassland and weed-dominated ruderal habitat.

Thank you for addressing our questions and requests,

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Cc: Jack Easton, Riverside Land Conservancy
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Riverside Land Conservancy Cienega Canyon Property

Vicinity & Location Maps





**Riverside Land Conservancy
Cienega Canyon Property**

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