

# SCOPING REPORT

## Southern California Edison Company's Coolwater-Lugo Transmission Project

Application No. A.13-08-023  
SCH No. 2014081007



CEQA Lead Agency:  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
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Prepared by:



NOVEMBER 2014

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November 2014

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## Acronyms Used in this Report

<b>AMS</b>	Abengoa Mojave Solar	<b>NEPA</b>	National Environmental Policy Act
<b>AQMD</b>	Air Quality Management District	<b>NOI</b>	Notice of Intent
<b>BLM</b>	US Bureau of Land Management	<b>NOP</b>	Notice of Preparation
<b>CAISO</b>	California Independent System Operator	<b>NPDES</b>	National Pollutant Discharge Elimination System
<b>CBD</b>	Center for Biological Diversity	<b>OHV</b>	Off-Highway Vehicle
<b>CDCA</b>	California Desert Conservation Act	<b>PEA</b>	Preliminary Environmental Assessment
<b>CDFW</b>	California Department of Fish and Wildlife	<b>PEIS</b>	Programmatic Environmental Impact Statement
<b>CEQA</b>	California Environmental Quality Act	<b>PG&amp;E</b>	Pacific Gas and Electric
<b>CFR</b>	Code of Federal Regulations	<b>PM10</b>	Particulate Matter
<b>CLTP</b>	Coolwater Lugo Transmission Project	<b>PV</b>	Photovoltaic (solar panels)
<b>CO2</b>	Carbon Dioxide	<b>RWQCB</b>	Regional Water Quality Control Board
<b>CPCN</b>	Certificate of Public Convenience and Necessity	<b>RETI</b>	Renewable Energy Transmission Initiative
<b>CPUC</b>	California Public Utilities Commission	<b>ROW</b>	Right of Way
<b>CRM</b>	Cultural Resource Management	<b>SCE</b>	Southern California Edison
<b>DRECP</b>	Desert Renewable Energy Conservation Plan	<b>SCG</b>	Southern California Gas
<b>DWMA</b>	Desert Wildlife Management Area	<b>SR</b>	State Route
<b>EIR</b>	Environmental Impact Report	<b>SWRCB</b>	State Water Resources Control Board
<b>EIS</b>	Environmental Impact Statement	<b>USACE</b>	US Army Corps of Engineers
<b>EMF</b>	Electric and Magnetic Fields	<b>USEPA</b>	US Environmental Protection Agency
<b>FLPMA</b>	Federal Land Policy and Management Act	<b>USFWS</b>	US Fish and Wildlife Service
<b>GHG</b>	Greenhouse Gas	<b>USGS</b>	US Geological Service
<b>HVCC</b>	Homestead Valley Community Council	<b>VRM1</b>	(BLM) Visual Resource Management
<b>JVIA</b>	Johnson Valley Improvement Association	<b>WEMO</b>	West Mojave (Plan)
<b>kV</b>	Kilovolt	<b>USFWS</b>	US Fish and Wildlife Service
<b>LORS</b>	Laws Ordinances Regulations and Standards		
<b>LVEDA</b>	Lucerne Valley Economic Development Association		
<b>MC3</b>	Mojave Communities Conservation Collaborative		
<b>MCLB</b>	Marine Corps Logistics Base		

# 1. Introduction

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This scoping report documents the public scoping effort conducted by the California Public Utilities Commission (CPUC) and the US Bureau of Land Management (BLM) for the Coolwater Lugo Transmission Project (CLTP). Southern California Edison (SCE), the project applicant, has filed an application with the CPUC for a Certificate of Public Convenience and Necessity (A.13-08-023) for approval to construct the project and to the BLM for a right-a-way grant to authorize the use of land administered by the BLM. The BLM process also requires an amendment to the California Desert Conservation Area Plan (CDCA). As part of the project review process and in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), the CPUC and the BLM will prepare a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) that will evaluate the potential environmental impacts of the project.

In compliance with CEQA and NEPA, the agencies held a 30-day public scoping period to allow the members of the public, regulatory agencies, and interested parties an opportunity to comment on the scope of the EIR/EIS and to identify issues that should be addressed in the environmental document. This report documents the issues and concerns expressed during the public scoping meetings held in August 2014 and the written comments received from the public, community organizations, and public agencies during the public scoping period.

## 1.1 Purpose of Scoping

The process of determining the focus and content of the EIR/EIS is known as scoping. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the final decision on the proposed project. The scoping process is not intended to resolve differences of opinion regarding the proposed project or evaluate its merits. Instead, the process allows all interested parties to express their concerns regarding the proposed project and thereby ensures that all opinions and comments are considered in the environmental analysis. Scoping is an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties. Members of the public, relevant federal, State, regional and local agencies, interests groups, community organizations, and other interested parties may participate in the scoping process by providing comments or recommendations regarding issues to be investigated in the EIR/EIS.

Comments received during the scoping process are part of the public record as documented in this scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC and BLM and will be used in determining the appropriate scope of issues to be addressed in the EIR/EIS and in the selection of alternatives to be carried forward for further analysis. The objectives of the scoping process were to:

- Inform the public and relevant public agencies about the project, CEQA and NEPA requirements, and the environmental impact analysis process;
- Solicit input on the CLTP project for evaluation in the EIR/EIS; and

- Update the mailing list of public agencies and individuals interested in future project meetings and notices.

## 1.2 Scoping Report Organization

This scoping report includes five sections and appendices, as described below:

- **Section 1** provides an introduction to the report and describes the purpose of scoping and presents the organization of the report.
- **Section 2** presents the purpose and need of the lead agencies and provides information on the project.
- **Section 3** provides information on the scoping meetings and outreach resources.
- **Section 4** summarizes the comments received and issues raised during the scoping comment period.
- **Section 5** describes the next steps in the EIR/EIS and project review process.
- **Appendices** consist of supporting materials used during scoping such as the Notice of Preparation, Federal Register publication of Notice of Intent, meeting materials, newspaper advertisements, meeting transcripts, summaries of oral meeting comments, and written comment letters.

## 2. Proposed Project

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To provide background on the proposed project and the joint environmental document being prepared, this section provides information on the lead agencies purpose and need as well as the applicant objectives. A brief description of the project is also provided. Additional information on the project is provided on each of the respective agency websites as noted below:

[www.cpuc.ca.gov/Environment/info/aspen/cltp/cltp.htm](http://www.cpuc.ca.gov/Environment/info/aspen/cltp/cltp.htm)

[www.blm.gov/ca/st/en/fo/barstow/renewableenergy/coolwater\\_lugo.html](http://www.blm.gov/ca/st/en/fo/barstow/renewableenergy/coolwater_lugo.html)

### 2.1 BLM Purpose and Need

The Federal Land Policy and Management Act (FLPMA) (Section 1.3(c)) requires public lands to be managed for multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources. The Secretary of the Interior is authorized to grant right-of-ways (ROW) on public lands for systems of generation, transmission, and distribution of electric energy (Section 501(a)(4)). Taking into account this multiple use mandate, the BLM's purpose and need for the CLTP is to respond to SCE's FLPMA ROW application to construct, operate, maintain, and decommission a 220/500-kV transmission line and associated infrastructure on public lands administered by the BLM. The completed EIR/EIS and the requirements of FLPMA, BLM ROW regulations, and other applicable federal laws and policies will be considered in the response to SCE's application.

The BLM will decide whether to deny the proposed ROW, grant the ROW, or grant the ROW with modifications. The BLM's action will also include consideration of potential amendments to the California Desert Conservation Area (CDCA) Plan.

### 2.2 CPUC Purpose and Need

The CPUC is charged with the regulation of Investor-Owned Utilities operating within California such as SCE. CPUC's purpose is to determine the adequacy of the EIR/EIS and to provide certification of CEQA compliance if it is determined that the document satisfies all CEQA requirements.

After the evaluation and certification of the EIR/EIS, the CPUC will respond to SCE's application for a Certificate of Public Convenience and Necessity (CPCN). Prior to taking action on the application, the CPUC must determine that the project is consistent with its rules for granting CPCNs. General Order 131-D states that no electric public utility shall construct electric transmission line facilities designed for operation at 200 kV or more without the CPUC having first found that the facilities are necessary "to promote the safety, health, comfort, and convenience of the public, and that they are required by the public convenience and necessity." In addition, the CPUC seeks to achieve the State of California's goals for the transmission, distribution, and use of renewable energy in California. A crucial step in fulfilling this purpose is for the CPUC to explore possibilities for the removal of constraints on the transmission of electricity from its point of generation to its point of use, such as would be facilitated by the project. In connection with this purpose, the CPUC must also attempt to further implement other State policies and programs related to power generation and transmission.



## 2.3 Applicant's Project Objectives

The purpose of the proposed CLTP is to:

- Provide additional transmission capacity to help alleviate the 220-kilovolt ("kV") transmission bottlenecks between the existing Kramer and Lugo Substations and between the Lucerne Valley area and Lugo Substation,
- Facilitate the interconnection of renewable generation projects,
- Accommodate future electricity demand serving in the High Desert Region, particularly in the Town of Apple Valley, and
- Improve electric system reliability.

The applicant's PEA provides objectives for meeting the purpose and need for the project. Some of these objectives include achieving the California's Renewable Portfolio Standards in an expedited manner, providing transmission facilities for full delivery of a 275-MW renewable energy project, complying with applicable reliability planning criteria, supporting the Greenhouse Gas Reduction Program, minimize potential environmental impacts, and meet needs in a cost effective manner.

## 2.4 Project Description

CLTP includes construction of a new high-voltage transmission line extending approximately 63 miles between SCE's Coolwater Switchyard located in Daggett and SCE's Lugo Substation located in Hesperia. The proposed transmission line would traverse approximately 15 miles of lands managed by the BLM, with the remainder on private or other public lands within San Bernardino County. Approximately 44 miles of the transmission line would parallel or be within existing overhead utility rights-of-way. To enable construction of the proposed transmission line, approximately 43 miles of existing 220-kV transmission lines would be removed. The project also includes new substation facilities to support transmission line termination and new telecommunication facilities.

- Construction of about 47 miles of 220-kV double-circuit structures between the existing Coolwater Switchyard and the new Desert View Substation. This portion of the project crosses land administered by the BLM. It also includes private land and land owned by the California State Lands Commission.
- Construction of about 16 miles of 500-kV single-circuit structures between the new Desert View Substation and the existing Lugo Substation, generally located in an existing transmission line right-of-way. This line would be built to 500-kV standards, but would initially be operated at 220 kV, and would initially carry the load from the new Coolwater-Desert View 220-kV transmission line and the existing Lugo-Pisgah No. 1 and No. 2 220-kV transmission lines.
- Removal of about 28 miles of the existing Lugo-Pisgah No. 1 220-kV transmission line from a location southwest of the intersection of Haynes Road and State Route 247 and the existing Lugo Substation.
- Removal of about 16 miles of the existing Lugo-Pisgah No. 2 220-kV transmission line between the Desert View Substation and the existing Lugo Substation.

- Construction of a new unstaffed, automated Desert View Substation (at full build-out) on approximately 86 acres located southeast of the Town of Apple Valley and west of Lucerne Valley, which would initially be constructed as a switching station. The existing Lugo-Pisgah No. 1 and No. 2 220-kV lines would terminate into this substation. Full build-out of the substation would occur in the future as additional substation components are needed, as dictated by load growth, reliability needs, and generation interconnection requests.
- Installation of new telecommunication lines between the existing Apple Valley Substation and the new Desert View Substation (approximately 11 miles) and between the Gale Substation (located near Daggett) and the Pisgah Substation (located between Newberry Springs and Ludlow) (approximately 29 miles). The majority of the fiber optic cable would be installed on existing wood and light-weight steel poles, which would require new cross arms.
- Construction of various modifications at both the Coolwater Switchyard and the Lugo Substation to accommodate the Coolwater-Desert View-Lugo transmission line.

# 3. Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for CLTP. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the project (meetings, fax, email, and mail). The 30-day scoping period began on August 4, 2014, and ended on September 3, 2014.

## 3.1 Notice of Intent

As required by federal regulation 40 CFR 1508.22, the BLM published the Notice of Intent (NOI) in the Federal Register on August 4, 2014, which initiated the BLM public scoping period on the CLTP. The NOI summarized the proposed project, stated the agency’s intention to prepare a joint EIR/EIS, and requested comments from interested parties (see Appendix A).

## 3.2 Notice of Preparation

On August 4, 2014, the CPUC issued a Notice of Preparation (NOP), consistent with CEQA Guidelines §15082, which summarized the proposed project, stated its intention to prepare a joint EIR/EIS, and requested comments from interested parties (see Appendix A). The NOP included information on the date, time, and location of the public scoping meetings. More than 330 NOPs were mailed to responsible, trustee, and interested agencies and the State Clearinghouse.

## 3.3 Public Scoping Meetings

The CPUC and BLM held four public scoping meetings from August 19 to August 21, 2014. Table 1 presents the four scoping meetings held for the CLTP. The scoping meetings provided an opportunity for the public, community and interest groups, and public agencies to obtain more information on the project, to learn more about the CEQA and NEPA environmental review processes, to ask questions regarding the project, and to provide comment on the project.

Date and Time	Location	Signed-in <sup>1</sup>	Speakers	Comment Letters <sup>2</sup>
August 19, 2014 6:00 – 8:00 PM	Barstow City Council Chambers, 220 E. Mountain St., Barstow, CA	149	18	102
August 20, 2014 3:30 – 5:30 PM	Lucerne Valley Community Center, 33187 Highway 247 E., Lucerne Valley, CA	73	20	10
August 20, 2014 7:00 – 9:00 PM	Percy Bakker Community Center, 9333 E. Ave., Hesperia, CA	44	18	3
August 21, 2014 6:00 – 8:00 PM	Victor Valley Museum, 11873 Apple Valley Rd., Apple Valley, CA	104	23	18
	<b>Total</b>	<b>370</b>	<b>79</b>	<b>133</b>

1. This number includes individuals that signed-in at the meetings. At each meeting, some people did not want to sign in so there was additional attendance at each of the four meetings.

2. This number includes the written comment letters submitted at each of the public scoping meetings. An additional 662 written comment letters were submitted by mail or email on the project, for a total of 795 written comment letters.

## Scoping and Meeting Notices

A four-page **Scoping Mailer** was sent to all property owners within 600 feet of the project route and within ½ mile on BLM administered lands, and to interested parties, and agencies. More than 6,500 Scoping Mailers were distributed, which included information on scoping, the scoping meetings, information on the project, and information on how additional information could be obtained on the project. Also, at the request of one of the meeting participants, the Scoping Mailer was translated into Spanish (see Appendix B).

Publication	Language	Date
Apple Valley Review	English	Tue, Aug. 12
Daily Press (Victorville)	English	Tue, Aug. 12
Desert Dispatch (Barstow)	English	Tue, Aug. 12
El Mojave	Spanish	Sat, Aug. 16
Hesperia Star	English	Tue, Aug. 12
The Leader (Lucerne Valley)	English	Wed, Aug. 13
Victorville Review	English	Tue, Aug. 12

The preparation of the EIR/EIS and the date and location of the public scoping meetings were advertised in seven newspapers. Advertisements provided a brief synopsis of the proposed project, included a map of the project route, and encouraged attendance at the scoping meetings to share comments on the project. The advertisements were placed in the newspapers listed in Table 2 (also see Appendix B).

## Meeting Handouts

Handouts and informational materials were provided at each of the four scoping meetings. The list below identifies the meeting handouts.

- Meeting Agenda
- Scoping Mailer
- Project Fact Sheet (8)
- Scoping Mailer
- Self-addressed Comment Form
- Speaker Registration Card
- Translation Request Form

Other information was also made available for public review, which included maps of the project alignment, issue-specific information boards, selected visual simulations, a board on the EIR/EIS process, and a board on transmission construction. Appendix C includes the meeting handouts and materials and Appendix D includes copies of the sign-in sheets from each meeting.

Each meeting included a court reporter to transcribe all of the oral public comments presented at these meetings. Appendix E includes the transcript of the comments received at these meetings as well as a summary of comments. This report has considered all oral and written comments presented at the public meetings as well as written comments submitted by email or by mail during the scoping comment period. Appendix F includes all of the written comment letters received on the project.

## 3.4 Agency and Tribal Government Consultation

Prior to and during the public scoping period, the CPUC and BLM contacted affected public officials and tribal government representatives in an effort to provide information about the proposed project, the EIR/EIS process, and to consult with them regarding potential concerns or issues. Table 3 provides a list of all agencies that were contacted via telephone and/or email by the CPUC.

**Table 3. Agencies and Tribal Government Contacted Via Phone and Email**

Agency / Tribal Government	Contact Name	Contact Position	Project Segment
City of Barstow	Michael Massimini Gaither Loewenstein	City Planner Economic Development and Planning Manager	9, 10
City of Hesperia	Michael Podegracz Dave Reno	City Manager Principal Planner	7
California State Lands Commission	Jennifer Deleon Jim Porter	Project Manager, Environmental Planning and Management Division School Lands Assistant Chief	2, 13
Edwards Air Force Base	Andrea Brewer-Anderson	Program Manager	---
Mojave Desert Air Quality Management District	Alan De Salvio	Supervising Air Quality Engineer	All
San Bernardino County Fire Department	Joe Zuccaro	North County Fire Prevention Specialist	All
San Manuel Band of Mission Indians	Daniel McCarthy Ann Briety	Cultural Resources Division Lead Field Director	All
Chemehuevi Indian Tribe	Edward D. "Tito" Smith	Chairman (at the time)	All

As a result of this initial consultation, two local agencies expressed interest in meeting with the CPUC, BLM, and/or their environmental consultants (Aspen Environmental Group [Aspen]) to learn more about the CLTP. Representatives of the San Manuel Band of Mission Indians also expressed interest in the project (see "Tribal Government Consultation" discussion below).

The CPUC and Aspen held the following meetings:

- June 2, 2014 – City of Barstow – Met with Michael Massimini, City Planner and Gaither Loewenstein, Economic Development and Planning Manager
- June 2, 2014 – City of Hesperia – Met with Michael Podegracz, City Manager and Dave Reno, Principal Planner

During these local agency meetings, the CPUC and Aspen presented the proposed project to the agencies, answered questions, and solicited informal input on any issues and concerns with the project. CPUC/Aspen provided a project factsheet and maps at these agency meetings.

## Tribal Government Consultation

In July 2012, the BLM sent out letters to two tribes – San Manuel Band of Mission Indians and the Chemehuevi Indian Tribe, both of which have a presence in the Mojave Desert. Following this initial consultation, the BLM began consulting directly with the San Manuel Band of Mission Indians. Consultation has been ongoing, with tribal participants on the ground doing cultural work with the BLM, CPUC (Aspen), SCE, and SCE's Cultural Resources Management (CRM) Consultant (Pacific Legacy). Table 4 provides a summary of the consultation activities completed prior to and during the scoping period (July 12, 2012 through September 3, 2014).

<b>Table 4. Summary of Tribal Government Consultation Activities</b>		
<b>Date</b>	<b>Activity</b>	<b>Participants<sup>1</sup></b>
7/12/2012	Letters sent to Tribes	BLM-Tribes
11/19/2012	South of Kramer (SOK) Site visit tribe <sup>2</sup>	BLM-Tribe-Applicant-Applicant's CRM Consultant
5/1/2013	Meeting	BLM-Tribe-Applicant-Applicant's CRM Consultant
6/20/2013	Public Open House Discussed Site Participant training	BLM-Applicant-Tribe
8/9/2013	Project site visit and visit to sensitive site	BLM-Tribe
8/21/2013	Project site visit with State Historic Preservation Officer (SHPO) to Daggett area	BLM-SHPO-Tribe
8/27/2013	Discussion of project and tribal participant workshops	BLM-Tribe-Applicant-Applicant's CRM Consultant
11/18/2013	Discussion on Tribal Consultation and Tribal workshops	BLM-Tribe-Applicant-Applicant's CRM Consultant
12/9/2013	Discussion on Tribal workshops	BLM-Tribe-Applicant-Applicant's CRM Consultant
12/13/2013	Tribal Training with San Manuel, SCE, Pacific Legacy (Applicant's CRM Consultant)	BLM-Tribe-Applicant-Applicant's CRM Consultant
12/14/2013	Tribal Training with San Manuel, SCE, Pacific Legacy	BLM-Tribe-Applicant-Applicant's CRM Consultant
2/3/2014	CLTP Non-Federal Consultation Query	BLM-Tribe-Applicant-Applicant's CRM Consultant
2/10/2014	CLTP Non-Federal Consultation Query	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
2/26/2014	CLTP Archaeological Team Meeting	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
4/3/2014	Site visit planning	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
4/11/2014	Site visits to determine testing for site eligibility	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
4/12/2014	Site visits to determine testing for site eligibility	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
4/13/2014	Site visits to determine testing for site eligibility	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
5/6/2014	Follow Up from April field visit: testing recs discussed and finalized	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
5/7/2014	Follow Up from April field visit: testing recs discussed and finalized	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
5/21/2014	Site visits to sites along Segment 13, Highway 247	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
6/2/2014	Circulation and discussion of forensic data from testing	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
6/4/2014	Circulation and discussion of forensic data from testing	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
6/10/2014	Site Visit Rabbit Lake	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
6/19/2014	Site visit to Rabbit Lake testing	BLM-Tribe-Applicant-Applicant's CRM Consultant
7/10/2014	Segment 13 planning	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/11/2014	Segment 13 planning	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC

<b>Table 4. Summary of Tribal Government Consultation Activities</b>		
<b>Date</b>	<b>Activity</b>	<b>Participants<sup>1</sup></b>
7/17/2014	Highway 247 field visit	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/18/2014	Field visit follow-up discussions and report distribution	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/19/2014	Field visit follow-up discussions and report distribution	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/20/2014	Field visit follow-up discussions and report distribution	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/21/2014	Field visit follow-up discussions and report distribution	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
7/31/2014	Testing along Segment 13	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/15/2014	Discussion and coordination of distribution of Survey Map for 1,200 additional acres in Segment 13	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/19/2014	Public Scoping Meetings for CLTP	BLM-CPUC-Tribe-Public
8/20/2014	Public Scoping Meetings for CLTP	BLM-CPUC-Tribe-Public
8/21/2014	Public Scoping Meetings for CLTP	BLM-CPUC-Tribe-Public
8/25/2014	Discussion and coordination of planning for SBR-6727	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/25/2014	Discussion and coordination of planning for backhoe testing at Site SBR-181 (Rabbit Lake)	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/27/2014	Discussion of preparation and schedule for EIS/EIR	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/28/2014	Sensitive site visit	BLM-Tribe
8/28/2014	Discussion and coordination of planning for SBR-6727	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
8/29/2014	Discussion and coordination of planning for SBR-6727	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC
9/3/2014	CLTP Team Meeting to discuss report schedule	BLM-Tribe-Applicant-Applicant's CRM Consultant-CPUC

(1) Tribe = San Manuel Band of Mission Indians. Applicant = Southern California Edison. Applicant's CRM Consultant = Pacific Legacy.

(2) South of Kramer (SOK) was the original name for the Coolwater-Lugo Transmission Project (CLTP).

## 3.5 Outreach

The CPUC and BLM provided opportunities for the public and agencies to ask questions or comment on the project outside of meetings. A project information hotline, email address, and website were established and available during the public comment period, and will be available throughout the project. Information on these additional outreach efforts are described below.

### Project Information Hotline

To offer another opportunity to inquire about the public scoping meetings or the proposed project, a project-specific phone line (888-423-2220) was established to answer questions about the project or the

EIR/EIS process. Telephone messages were retrieved and all calls were promptly addressed. Only inquiries (questions) were provided through the phone line.

## **Email Address**

An email address (CLTP-EIR-EIS@aspenerg.com) was established for the project to provide another means of submitting comments on the scope and content of the EIR/EIS. The email address was provided on meeting handouts and posted on the website. Comments received by email have been considered and incorporated into this report.

## **Internet Website**

The CPUC and BLM have established project-specific websites to provide ongoing information about the project. During the scoping period, the website included electronic versions of the application and an interactive project-related map. The websites provided, and will continue to provide throughout the project, additional public venues to learn about the project. The websites will remain a public information resource for the project and will announce future public meetings and hearings. The website addresses are:

[www.cpuc.ca.gov/Environment/info/aspeng/cltp/cltp.htm](http://www.cpuc.ca.gov/Environment/info/aspeng/cltp/cltp.htm)

[www.blm.gov/ca/st/en/fo/barstow/renewableenergy/coolwater\\_lugo.html](http://www.blm.gov/ca/st/en/fo/barstow/renewableenergy/coolwater_lugo.html)

## **Distribution List/Database**

The CPUC and BLM have compiled a comprehensive project-specific mailing list with over 6,500 entries. The mailing list/database will be updated based on contact information from the scoping meetings and comments letters received during the scoping comment period; the mailing list will be reviewed to confirm all meeting attendees and all individuals, organizations, and agencies that submitted written comments are on the list. This mailing list will continue to be used throughout the environmental review process for the project to distribute public notices and will continue to be updated to ensure all interested parties are notified of key project milestones.



# 4. Scoping Comments

## 4.1 Agencies, Organizations, and Persons Providing Scoping Comments

This section summarizes the key issues raised during the public comment period. A total of 795 written comment letters were submitted and 79 individuals presented oral comments during the public scoping meetings. More than 580 of the total number of letters received were signed form letters. Of the comment letters received on the project, 27 letters were received from public agencies and interested organizations. No letters were received from tribal governments. Table 5 lists the public agencies and organizations that provided comments on the project.

<b>Table 5. Comments Received from Public Agencies and Organizations</b>	
<b>Public Agencies</b>	<b>Date</b>
Mojave Desert Air Quality Management District, Alan J. De Salvio	8/7/14
California Department of Water Resources, SWP Operations Support Office, David M. Samson, Chief	8/28/14
California Regional Water Quality Control Board, Lahontan Region, Jam M. Zimmerman PG	8/29/14
United States Marine Corps, Air Ground Combat Center, Erin M. Adams, Encroachment Manager	8/29/14
United States Marine Corps, Logistics Base, M.L Scalise	9/2/14
United States Department of the Interior, Dept. of Fish & Wildlife, Ecological Services, Palm Springs Office, Kennon A. Corey	9/2/14
City of Fontana, Catherine Lin, AICP	9/2/14
County of San Bernardino, Department of Public Works, Gerry Newcombe	9/2/14
United States Environmental Protection Agency, Region IX, Tom Plenys	9/3/14
Juniper Riviera County Water District, Arto J. Nuutinen, Esq	9/3/14
California State Water Resources Control Board, Division of Water Quality, 401 Certification & Wetlands Unit, Cliff Harvey, Environmental Scientist,	9/3/14
California Department of Fish and Wildlife, Kimberly Nicol, Regional Manager Inland Deserts Region	9/16/14
Town of Apple Valley, Lori Lamson, Assistant Town Manager	11/12/14
<b>Organizations and Companies</b>	
Southern CA Gas Company, James Chuang	8/25/14
Lucerne Valley Economic Development Association, Chuck Bell	8/23/14
Alliance For Desert Preservation, Richard P. Ravana	8/31/14
Desert Tortoise Council, Edward L. LaRue, Jr. M.S	9/2/14
Defenders of Wildlife, Jeff Aardahl and Stephanie Dashiell	9/2/14
Scenic Highway 247 Committee, Betty Munson	9/2/14
Basin and Range Watch, Kevin Emmerich and Laura Cunningham	9/1/14
Homestead Valley Community Council, Rick Sayers	8/27/14
National Parks Conservation Association, Seth Shteir	9/3/14
Johnson Valley Improvement Association, Harvey Helfand	8/29/14
Center for Biological Diversity, Ilene Anderson	9/3/14
California Desert Coalition, Claudia Sall	9/3/14
Mojave Communities Conservation Collaborative, Lorrie Steely, Founder	9/3/14
Sierra Club, Sarah K. Friedman, Sr. Campaign Representative Beyond Coal Campaign	9/5/14

The comments submitted during the scoping period are summarized below. To facilitate the consideration of these comments in the EIR/EIS, this summary presents the comments by categories and by environmental topic. However, all of the comments are in the appendices in their original format and as presented in the scoping meetings. Appendix E includes a summary of oral comments, speaker registration cards, and a transcript of the comments received for the public scoping meetings. Appendix F includes copies of the written comment letters submitted on the project.

## 4.2 Project Description

- Applicant Proposed Measures need to include greater detail as to how they could minimize project impacts. According to this commenter, the Applicant Proposed Measures lack both substance and specificity, therefore the EIR/EIS must be specific as to what measures are and how they could modify significant impacts. (*Alliance for Desert Preservation*)
- The project does not include the Jasper Substation; it is considered a separate project even though it could connect to this line in the future. Instead of piecemealing, the EIR/EIS should evaluate all potential substations. (*Center for Biological Diversity [CBD]*)
- A better description of the Desert View substation is needed in the EIR/EIS. For instance, the public was not told that the substation could be 160 acres, they were told 70, 66, and 10 acres.
- The project description needs to clearly describe what the project could include. For instance, a clear presentation on the number of structures and whether not the line/towers may be within an existing or new corridor.
- The EIR/EIS should include information on the length of planned electrical outages.
- The EIR/EIS should include the amounts and types of ground disturbing activities that will take place (including staging and set up areas, building sizes and heights, location of associated towers, fencing, tower construction, new roads or roadway improvements, length of construction times and possible disruptions to community travel patterns, operational impacts, noise, maintenance) as well as the area needed to buffer the adjacent community from potential direct and indirect impacts. (*Town of Apple Valley*)

## 4.3 Purpose and Need

- The EIR/EIS should clearly explain the purpose and need for the proposed project. (*USEPA and several commenters*)
- The proposal for Abengoa Mojave Solar (AMS) project stated it did not need CLTP. The AMS project applicant should be required to amend their permit because the CLTP application identifies AMS in its description and purpose and need. If the AMS proposal approved by California Energy Commission does not change then SCE needs to remove reference to AMS because multiple state and federal agencies reviewed the AMS project. The reviewing agencies for the AMS did not evaluate CLTP as an option. In the AMS application, CLTP should have been evaluated as a connected action. (*Basin and Range Watch and several commenters*)
- The project may be used for LA basin and not for communities that could be affected by the project. People who live in the desert may not have access to the power from this project. (*Lucerne Valley Economic Development Association and several commenters*)
- The purpose and need statement should include mandates to protect sensitive biological, hydrological, cultural, and visual resources from unnecessary harm. The statement should also include a mandate to maintain access to public lands as well as preserve the California Desert

Conservation Area. (*Basin and Range Watch*)

- The project description states that the Lucerne Valley has been identified as a rich solar and wind resource area and states the purpose is to provide additional transmission capacity. This projected renewable energy is not a "done deal", SCE and PUC need to rethink need for and benefit of this project. (*Lucerne Valley Economic Development Association*)
- This application should be shelved until regional renewable energy plans are completed. The desert area is dealing with too many individual projects; there are too many parts or projects and residents do not understand the consequences of these projects. The Lucerne Valley Economic Development Association (LVEDA) noted the CLTP is an inefficient, circuitous, and costly path to get Abengoa Mojave Solar Project into PG&E's grid. The CLTP project could determine where industrial scale renewables are sited - where Purchase Power Agreements may be easiest to obtain. (*LVEDA and several commenters*)
- SCE has not presented a compelling rationale of the need for the project, and the agencies may want to conduct an independent analysis and publically disclose their findings. (*Defenders of Wildlife*)
- Various energy projects have been planned and proposed within the area and all have been withdrawn due to concerns with biological impacts and interference with military testing. Planned renewable energy projects in the Kramer and Lucerne Valley areas are speculative and may not justify need for the project. (*Defenders of Wildlife and several commenters*)
- The Mojave Solar Project was approved with the use of the existing transmission system. Thus, the need for CLTP Project to support Mojave Solar Project may be incorrect and should not be considered in EIR/EIS. The DRECP (Desert Renewable Energy Conservation Plan) and the County of San Bernardino upcoming plans and documents should be used to determine need for the project not SCE. (*Basin and Range Watch, Defenders of Wildlife, and several commenters*)
- The need for the CLTP and Desert View Substation may not be adequately supported because capacity already exists in this and other transmission corridors as documented in published studies. The agencies should wait and see what transmission is needed before approving the project; the current approach puts the "cart before the horse".
- The purpose and need is to support the Abengoa Mojave Solar Project however the analysis of the AMS project did not include the need for a new transmission line. (*Basin and Range Watch*)
- It is not clear that this proposal is necessary to support renewable energy. The only project identified as reliant on the project is Mojave Solar, and past agency filings have stated that Mojave Solar does not need the project to operate. The project description should be adjusted so that it describes what this project actually could accomplish. (*CBD*)
- The application points to RETI (Renewable Energy Transmission Initiative) and DRECP as evidence of the need for the project. However, evidence given does not exist to support the need statement. Approving a transmission line before finalizing DRECP predetermines conservation values and effectively sidelines the balancing of conservation needs and renewable energy development in this area. (*California Desert Coalition*)
- The need for the CLTP and the Desert View Substation must be presented; it is not a shortage of electricity but power consumption.
- Project maps do not accurately portray the properties impacted by the project.
- The project may not improve capacity, but may capture and transfer power from the Mojave solar project that is going live. SCE may also provide power to PG&E so that they can meet their renewable energy mandate. The project may not for the LA Basin but for PG&E.

## 4.4 Human Environment Issues

### Aesthetics/Visual Resources

- The project may affect the view along Highway 18 because the project may be too industrial for the area. Also, roads constructed for the project may create long-term impacts to visual resources.
- The project may have a negative visual effect from ugly and unnecessary towers and transmission lines on scenic vistas and open space of the high desert.
- The EIR/EIS should address scenic vistas. The project has the potential to negatively affect the view of the serene beauty of the region, its fragile desert ecosystem, and scenic rural setting.
- If the project is implemented as proposed it could preclude, especially BLM's alternative route, the designation of Highway 247 (Barstow Rd) as a State Scenic Highway. This highway is one of the last if not the last road in California to be eligible for this designation. (*Lucerne Valley Development Association, Scenic Highway 247 Committee, and Homestead Valley Community Council*)
- Any industrial project visible from the Highway 247 could have a devastating impact on valuable scenic attributes and the largely visitor-generated economy of the High Desert. (*Homestead Valley Community Council*)
- The EIR/EIS should apply BLM VRM1 (Visual Resource Management) standards for the entire project area. (*Basin and Range Watch*)
- The EIR/EIS should consider night sky lighting from working at night and if lighting is placed on tall towers.
- Alignment Alternative 9 is adjacent to lands designated in the Barstow General Plan for single family residences, which would have significant and severe impact on visual resources. This could create adverse effect on land and property values. Alternative 10 may be a preferable alignment and may avoid the issues mentioned. (*Marine Corps Logistics Base [MCLB]*)
- Protection of views, vistas, and desert landscape are a concern of the Town of Apple Valley. (*Town of Apple Valley*)

### Cultural and Paleontological Resources

- The EIR/EIS should describe the process and outcome of government-to-government consultation between BLM and each of the tribal governments within the project area, issues that were raised, and how those issues were addressed in the selection of the proposed alternative. (*USEPA*)
- Tribes should be consulted early enough so they can fully participate and have enough time to decide how resources should be preserved and avoided, if identified. (*Basin and Range Watch*)
- The vast area along the north slope of the San Bernardino Mountains has significant cultural resources and known sites to be avoided, but have never been mapped for public information. (*Lucerne Valley Economic Development Association*)
- The project site includes important archaeological sites and features such as Juniper Flats, historical route used in the Battle of Chimney, Coxey Truck Trail, remains of gold mining efforts, and historic ranches. (*Mojave Communities Conservation Collaborative [MC3]*)
- The EIR/EIS must address the means of protecting cultural resource sites such as identifying and discussing specific sites and types and addressing potential difficulties in protecting these sites. (*Alliance for Desert Preservation*)
- The project area has significant cultural resources. Four previously unidentified sites were identified by a group of archeologists and commenter in the Project area.

- The EIR/EIS should identify and discuss each specific cultural site including mitigation efforts to protect cultural resources. A site-specific plan should be required for the project to provide the public an opportunity to provide meaningful input on existing and any new potential alternatives.
- The EIR/EIS should address the significant paleontological resources (petroglyphs) that could be present in the project area and should identify mitigation measures where appropriate.

## Environmental Justice

- The EIR/EIS should present an evaluation of environmental justice populations with geographic scope of the project. The potential for disproportionate adverse effects to minority and low-income populations and the approaches used to foster public participation by these populations should also be addressed. (*USEPA*)
- The project area provides significant transmission power to the LA Basin and SCE's grid, and produces most of the cement and limestone used in SoCal. Other areas need to bear some of this burden. For instance, Lancaster/Palmdale wants a transmission line, which is a valid alternative to this one. (*LVEDA*)
- The project has the potential to impact property values and does not provide the promised levels of sufficient full time permanent jobs. In addition, anticipated or future energy projects that could be constructed only result in 12 full time jobs. This is an environmental justice issue. (*Basin and Range Watch*)
- The CLTP is an example of a major negative impact on rural communities; communities may receive nothing from it, no jobs, no reduction in rates, and no enhancement of visitor attractions. (*Homestead Valley Community Council [HVCC]*)
- There is no positive benefit to this community only to Los Angeles. The Mojave Desert communities should not be made to continuously support Los Angeles. It is unfair for rural areas to bear the burden of the self-imposed problems of over development in other areas.
- Residents have already accepted a huge responsibility for "those people down there" through water transport, transport of goods and services, and recreation for 12 million people.
- The CLTP is a clear case for environmental justice because the entire burden is placed on the desert communities. There are plenty of other areas for the project such as Riverside, San Diego, Ventura, and Santa Barbara. Put the project in these locations to meet this renewable mandate if we have not met it yet; the mandate may not be met because solar rooftops are not part of the renewable mandate calculation.
- Projects such as CLTP could contribute to higher priced energy, which could hurt the poor.
- Desert residents may be footing the bill for a huge overpriced project, which has the potential to ruin the environment, resources, and rural culture. (*MC3*)
- If the project was only about transmission lines then residents could request lines to be placed underground, but not affluent enough like Chino Hills who made Edison put the lines underground.
- The EIR/EIS should address community values - giving the community an opportunity to create economic vitality and to preserve the quality of life. Rate and tax payers should be given a voice in the decision-making process about the type and location of new projects. (*LVEDA and MC3*)

## Fire/Emergency Response

- The project may interfere with aerial fire-fighting methods in the mountain and valley regions along the proposed route. The High Desert is a high-fire area with diverse and sensitive eco-systems.

- The EIR/EIS should address the project's potential to cause wildfires. One commenter stated that power line fires “typically fall into the top five causes of fire per year” according to the Texas A&M Forest Service. Dry vegetation and a downed tower could cause a spark leading to a wildfire. Wildfire and public safety are urgent concerns. (*Juniper Riviera County Water District and several commenters*)
- The project has the potential to increase the chance of catastrophic fires. In the Milpas Highlands area, there is significant chance of danger from natural disaster and potential downed power lines because there is only one road into and out of the area. (*MC3 and several commenters*)
- Residents pay a fee to CalFire for service. The agencies should request that a fireman evaluate access points from the perspective of fire officials in the event of a fire.
- The potential for fire is significant in the project area. Tejon Pass is a one-way-in one-way-out road. The power lines are proposed on the southwest side of this road. The winds blow south towards the northeast, which could cause the fire to move quickly.
- The EIR/EIS should address invasive species introduced by the project, which have the potential to increase the likelihood of fires, and include fire mitigation where appropriate.
- The project may interfere with aerial fire-fighting methods in the mountain and valley regions along the proposed route. The High Desert is a high-fire area with diverse and sensitive eco-systems.

## Land Use, Realty

- The proposed Desert View Substation site may be incompatible with the surrounding land uses (i.e., homes, ranches, and farm lands), and a new substation may be detrimental to the quiet, rural nature of this area.
- The project may be incompatible with the California Desert Conservation Area, which was declared by Congress to be “extremely fragile, easily scarred, and slowly healed.”
- The project should not be located near residences.
- The EIR/EIS should discuss how the project could support or conflict with objectives of federal, state, tribal, or local land use plans, policies, and controls. Proposed plans not yet developed should also be addressed if they have been formally proposed. (*USEPA*)
- Desert View Substation may be inconsistent with land use and residential integrity of the Town of Apple Valley and may induce growth of future industrial-scale renewable energy projects that could also be inconsistent. The project dilutes all the other renewable energy plans in process - creating a corridor of potential renewable energy projects before we know where they will be placed. (*LVEDA*)
- The CDCA Plan Amendment must consider the same criteria and factors which the EIR/EIS is subject to, and at the same levels of analysis. The assessment must consider the potential for the multitude of utility-scale renewable projects that could impact CDCA land. (*Alliance for Desert Preservation*)
- The EIR/EIS must consider the project’s compatibility with the DRECP. Because the DRECP won’t be out until September 2014, the EIR/EIS cannot assume consistency with the DRECP. (*Defenders of Wildlife*)
- A new transmission project such as the CLTP that could open up the region to further energy development may be inconsistent with the CDCA and the BLM’s multiple-use philosophy. (*Basin and Range Watch*)
- The Draft EIR/EIS must adequately address other planning efforts such as the DRECP and the BLM Solar PEIS. Planning should be completed before projects are approved; CLTP may not be favorable in the DRECP. (*CBD*)
- The Draft EIR/EIS should specifically address how the CLTP may serve development focus areas and

avoid identified conservation and harm to species covered in the DRECP. (*Sierra Club*)

- Alignment Alternative 9 is adjacent to lands designated in the Barstow General Plan for single family residences, which may have a significant and severe impact on visual resources. This could create adverse effect on land and property values. Alternative 10 may be a preferable alignment and may avoid the issues mentioned. (*MCLB*)
- As currently proposed, Segments 8, 9, 10 and 11 will cross military land and will come very close to the Marine Corps Logistics Base. The project may disrupt a new military training program that is being planned and may disrupt military activity between the installation base and the project area. The southwest range restricted air space and ground ranges cannot be replaced. (*MCLB*)
- Long-term sustainable planning is needed. The DRECP identifies the desert as a Development Focus Area. (*MC3*)
- The EIR/EIS should consider the potential for the project to violate land use and residential plans for the Apple Valley area.
- The EIR/EIS should also address whether or not private lands could be “confiscated”.
- The project may change the whole “complex” of Victor Valley from desert paradise to concrete.
- The EIR/EIS should consider consistency with the surrounding community and the Town’s General Plan when evaluating the Desert Substation and its alternatives. (*Town of Apple Valley*)

## Noise

- The EIR/EIS should include consideration of the potential for increased noise and traffic from commuter, worker and earth moving equipment as well as the potential for increased corona noise near residences. (*Juniper Riviera County Water District and other commenters*)
- The EIR/EIS should address the potential for corona noise to have an effect on resident’s health from the proposed larger 500-kV lines and towers. Studies show the only protection from these potential health issues is to provide distance or a buffer from individuals, plants, and wildlife.
- The EIR/EIS should evaluate the potential for noise when evaluating the Desert Substation and its alternatives. (*Town of Apple Valley*)

## Public Health and Safety

- Concerned about the health risks of 220-kV and 500-kV facilities located close to homes and from corona noise and EMF from the proposed larger 500-kV lines and towers.
- Concerned with the health effects from the transmission lines. US National Council on Radiation Protection and University of Bristol studies show that power lines have been linked to health problems such as infant death syndrome, tinnitus, childhood leukemia, seizures and other problems. The only protection from these problems is distance away from individuals, plants, and wildlife.
- Electrical transmission towers may have caused health problems to Lucerne Valley residents and where towers cross residential properties. Some property owners also live next to a solar plant that exposes residents to dust. Transmission and renewable energy projects may create irreparable harm to the health of residents and to the environment.
- The project may cause changes to desert terrain, which could contribute to flooding.
- The EIR/EIS should consider the potential for the project to affect military training routes along certain segments of the proposed and alternate routes.
- The EIR/EIS should address potential direct, indirect, and cumulative impacts of contaminated water from project construction and operation. The document could identify alternative industrial

processes using less toxic materials as mitigation. (*USEPA*)

- During project construction, helicopters should not be used because of high winds that exceed 100 mph. The EIR/EIS should fully evaluate the potential for environmental impacts and public safety if helicopters are used. (*Juniper Riviera County Water District*)
- The project could disrupt military activity between the installation base and the project area. The southwest range restricted air space and ground ranges cannot be replaced. (*MCLB*)
- The EIR/EIS should discuss the potential for exposure to Valley Fever from soil-disturbing activities and require an environmental awareness program. The EIR/EIS should provide a list of potential measures to reduce exposure to Valley Fever such as Personal Protective Equipment, limiting work during high-wind periods, and avoiding areas with potential to have Valley Fever fungus. (*USEPA*)
- The EIR/EIS should discuss potential for exposure to Valley Fever from soil-disturbing activities and require an environmental awareness program. (*USEPA, MC3, Basin and Range Watch*)
- The Milpas Highlands area has one road into and out of that area. The EIR/EIS should consider the potential for danger from a natural disaster and the potential for downed power lines and how areas such as the Milpas Highlands could be affected. (*MC3 and other commenters*)
- Transmission towers are subject to earthquakes, flooding, and lightning strikes and fires.
- The transmission lines/structures should be placed underground as it could be more cost effective and safer from terrorism in the long run. Lugo has been noted on maps as being a potential site for destruction by our enemies if the country was invaded.

## Recreation

- The project may adversely affect the natural beauty and quiet that characterizes the project area, which would impact recreational use.
- The project has the potential to significantly affect recreation in the Mojave Desert such as horseback riding, hiking, hunting, OHV use, camping, and exploring. (*MC3*)
- The EIR/EIS should analyze the potential for effects from construction noise and air quality associated with OHV use on recreational uses. The noise from the transmission towers affects horses and the towers will impact the beautiful desert.
- The EIR/EIS should address the potential for the project to effect tourism and the potential for reducing the appeal of the desert as an OHV paradise.

## Social and Economic Effects

- The project has the potential to negatively affect the property owner's ability to sell a parcel in the future if the transmission line crosses the property. (*Juniper Riviera County Water District*)
- The project may have devastating effects on the environment and on the local economy. The area already has a weak economy and the project could further affect the economy. (*HVCC*)
- Residents of the desert communities may have to live with the environmental impacts, may not receive power from the project, and may still have to pay for electrical power they cannot use.
- The EIR/EIS should address the project's potential to affect property values; commenters mentioned that for those properties adjacent to towers and substations, property values could decrease anywhere from 25 to 50 percent. Another commenter mentioned that near the proposed Desert View Substation, properties could devalue by as much as 35 percent.
- The economic recession of 2008 caused the value of properties in desert areas to decrease and now the project could further decrease property values. The decreased property values may have



reduced the city's tax base.

- The EIR/EIS should consider that tax payers residing in the project area may not benefit in a meaningful way while SCE and others may benefit from the power as well as large tax breaks. The analysis should also consider if the project is economically feasible.
- The EIR/EIS should address community values - giving the community an opportunity to create economic vitality and to preserve the quality of life. Rate and tax payers should be given a voice in the decision-making process about the type and location of new projects.
- The EIR/EIS should address the potential for FHA to reject loans for properties with taller power lines/towers in a fall zone. Taller towers require a larger fall zone; the existing easement with taller towers may not allow property owners to develop their property. Homeowners may need to be compensated if development is limited. The EIR/EIS should also address potential mitigation if additional land is acquired from property owners.
- The US government provides subsidies to foreign companies to build projects, but parts or project components are built in other countries then those parts are shipped to the US. The energy is sold to SCE and the residents pay the cost of that energy, and all of the money goes to other countries.
- Government should be fixing our roads and making other improvements instead of loaning our money for these projects.
- The EIR/EIS should address the potential for the project to negatively affect visitors and the film industry from continuing to come to the area and therefore could cause the county and cities to lose revenue from visitors and the film industry.
- The EIR/EIS should address the potential for the project to cause businesses to close and potential for loss of local area jobs.
- The project directly contradicts economic values local organizations support such as the designation of SR 247 as a California Scenic Highway and the campaign to promote tourism. (*Johnson Valley Improvement Association [JVIA]*)
- Solar on rooftops and parking lots may be a less expensive alternative, and may be better for local job creation, the taxpayer and the ratepayer. (*JVIA*)

## Special Designations

- The EIR/EIS should discuss how the project could support or conflict with the objectives of federal, State, tribal, or local land use plans, policies, and controls. Proposed plans not yet developed should also be addressed if they have been formally proposed. (*USEPA*)
- The EIR/EIS should consider the CDCA Plan Amendment and consider the potential for utility-scale projects that could impact CDCA land. (*Alliance for Desert Preservation*)
- The EIR/EIS should address BLM utility corridors, the Ord-Rodman DWMA (Desert Wildlife Management Area), desert tortoise Ord-Rodman Critical Habitat Unit, Stoddard Valley Open Area, and other BLM-designated areas such as raptor breeding areas relative to each alternative. (*Desert Tortoise Council*)
- The project could be proposed on land that represents the last hope for desert tortoise recovery and may require a CDCA plan amendment. Segment 1 is planned in Class L lands and in designated Desert Wildlife Habitat Management Area. (*CBD*)

## Traffic/Transportation

- The EIR/EIS should require SCE to fully pave Milpas Road if used for construction traffic.

- The EIR/EIS should address the potential for commuter, worker, and construction equipment to increase traffic in the project area. (*Juniper Riviera County Water District*)
- The EIR/EIS should address the project's potential to significantly increase traffic in commercial areas and other areas of Lucerne Valley such as the four-way stop in the center of town. (*LVEDA*)
- The EIR/EIS should address the potential for the project to increase stress and traffic congestion on existing roads (e.g. Roundup Way) from large construction vehicles.
- The EIR/EIS should evaluate the potential for possible disruptions to community travel patterns when evaluating the Desert Substation and its alternatives. (*Town of Apple Valley*)

## Utilities and Public Service

- The project may require permits from the County of San Bernardino, Department of Public Works for on-site and off-site improvements and to address site drainage. (*County of San Bernardino*)
- The EIR/EIS should discuss project activities that could cross or could be constructed near Southern California Gas (SCG) natural gas pipeline such as the condition of existing utility infrastructure, rights of ways and easements, need for gas service and grading/drainage that may increase erosion near SCG facilities. (*SCG*)
- The EIR/EIS should address the potential for public services to access the Milpas Highland area after a natural disaster and downed power lines where there is only one road into and out of the area.
- The EIR/EIS should address the potential for new roads developed for the project to increase dumping of trash along these roads and the potential for people to engage in disruptive behavior. (*MC3 and several commenters*)
- The lead agencies should have a fireman evaluate whether or not there are easy access points in the event of a fire.
- The EIR/EIS should address the potential for long-term demand for law enforcement to address trespass issues, unintended route proliferation, terrorism, and vandalism.
- New projects bring a boom and bust effect on local communities. During construction hundreds of people come to the area and many cause problems such as illegal off-roading, vandalism, harassment of wildlife and other undesired behavior. (*Basin and Range Watch*)

## 4.5 Natural Environment Issues

### Air Quality/Greenhouse Gas

- The EIR/EIS should address air quality associated with construction equipment and vehicles and should apply the Mojave AQMD significance thresholds. (*Mojave AQMD*)
- The project area has lots of dust storms that reach 70 to 80-miles per hour. How will the project do all of the grading and building with winds this high? These winds could create lots of dust.
- The assessment of air quality and greenhouse gas (GHG) emissions should address the potential to increase truck/vehicle emissions and fugitive dust emissions from construction of a large-scale substation, and the delivery of equipment for more than 65 miles of high-voltage transmission lines and 29 miles of telecommunications cable. The EIR/EIS should include a detailed study of air emissions. (*Juniper Riviera County Water District*)
- The project is located in Mojave Desert AQMD, which is in non-attainment area for PM-10. The project could increase emissions from disturbing hundreds of acres of cryptobiotic soil crusts, and therefore the EIR/EIS should address on-site cryptobiotic soil crusts. (*CBD*)

- The EIR/EIS should include detailed discussion of ambient air conditions and the project's effect on climate change. In addition, discussion of existing conditions, quantify emissions, specify emission sources, and requirement for a Construction Emission Mitigation Plan (e.g. Fugitive Dust Source Controls and Mobile, Stationary Source Controls, and Administrative Controls) should be addressed. (*USEPA*)
- The primary reason for the proposed transmission line is to transmit energy from proposed and planned renewable utility-scale renewable projects and to provide power to the Los Angeles area. Another reason given is to avoid the generation of CO<sub>2</sub>, a minor greenhouse gas. No science to date has demonstrated that the generation of CO<sub>2</sub> drives any kind of dangerous climate change.
- The EIR/EIS should include discussion of the effect of climate change on the restoration of plants and habitat that could be disturbed by the project. (*Alliance for Desert Preservation*)

## Biological Resources

### General Comments

- The project may cause disturbance to the delicate desert ecosystem.
- The EIR/EIS should consider the project's consistency with LORS that relate to resource management and conservation. In addition, the analysis should consider the San Bernardino Resource Conservation Land Use designations.
- The project area supports special status plants and animals and includes four designated conservation areas. The project may adversely impact these conservation areas and habitats. (*Defenders of Wildlife*)
- The EIR/EIS should include discussion of the effect of climate change on the restoration of plants and habitat that could be disturbed by the project. (*Alliance for Desert Preservation*)
- The California Department of Fish and Wildlife and the US Fish and Wildlife Service should be consulted to provide input on the project if sensitive species are identified; their findings should be included in the EIR/EIS before a decision is made on the project.
- Mitigation measures for biological resources should be identified so the project has the least negative effect on high-value wildlife habitat, reduces impacts from OHVs and increased human presence in the area as well as increased threat of fires. There needs to be proof that restoration efforts could work in a desert environment. (*Alliance for Desert Preservation and MC3*)
- The EIR/EIS should address California Endangered Species Act permit requirements and minimize and fully mitigate potential effects on Threatened and Endangered Species. Mitigation needs to be proportional to the extent of impact and include adequate funding for implementation and monitoring. (*California Department of Fish and Wildlife [CDFW]*)
- Several segments of the project fall within the Town of Apple Valley's Multispecies Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP) planning and conservation areas. The EIR/EIS should consider the project's consistency with these plans as well as address preliminary guidance on these plans and Town ordinances and land use plans. (*Town of Apple Valley*)

### Vegetation

- The application identified 81 plant species during the low-rain fall and did not encounter any federally listed plant species. The EIR/EIS should include as mitigation measures the suggested flagging and avoidance of sensitive plant species identified in the application and the requirement

for a weed management plan. (*US Fish and Wildlife Service [USFWS]*)

- The EIR/EIS should address wildlife connectivity in the project area and the cumulative effects on rare plants as well as address the potential for invasive weeds and use of herbicides. (*Basin and Range Watch*)
- Biological assessments or focused surveys should be conducted within one year of the distribution of the EIR/EIS and should be included in the EIR/EIS. Rare plant surveys should be required for the project to address the potential for identifying Mojave Yucca, Mojave buckwheat, Mohave monkey flower, Joshua trees, or other species in the Project area. (*CDFW*)
- The potential to restore an area that is disturbed is important because once damaged it is impossible to restore cleared land with old-style technologies. The EIR/EIS should address the potential for non-native plant development that could result from ground disturbance and what measures could be used for restoration. (*MC3*)
- The project includes Joshua trees that are hundreds of years old and 10,000 year old creosote rings in Lucerne Valley. (*MC3*)
- The PEA relies too heavily on restoration efforts of desert terrain, but it is very difficult to restore desert habitats after disturbance. The EIR/EIS must meticulously examine what kind of damage can be restored, by what means, and over what period of time. (*Alliance for Desert Preservation*)

## Wildlife

- Biological assessments or focused surveys should be conducted within one year of the distribution of the EIR/EIS and should be included in the EIR/EIS. (*CDFW*)
- Road-building activities may create long-term impacts to wildlife and its habitat. The project has the potential to cross a golden eagle area near Granite Mountains and could impact desert tortoise habitat.
- The project may result in effects to federally listed species (e.g. arroyo toad, desert tortoise) including the potential for “take” of these species in areas such as Ord-Rodman with desert tortoise critical habitat. Any potential for effects on the threatened desert tortoise and its habitat may impede their recovery contrary to the goals of the CDCA plan, Revised Desert Tortoise Recovery Plan, and DRECP. (*Desert Tortoise Council*)
- The project application did not identify arroyo toad, however the survey was conducted during a low-rainfall period. The EIR/EIS should include additional surveys if the area has more rainfall next spring, and should include requirements for monitoring construction in Mojave River segments, and identify mitigation for arroyo toad. (*USFWS*)
- The agencies should require use of authorized desert tortoise biologists to survey during construction, operation and maintenance, and decommissioning. (*USFWS*)
- The project has the potential to increase the number of ravens in the project area, which prey on desert tortoises. The EIR/EIS should include a requirement that the applicant design the project to exclude ravens, develop on-site management plan, and require contribution to the Regional Common Raven Management Program. The USFWS also recommended use of Tubular Steel Poles instead of lattice structures for raven management. (*USFWS*)
- The EIR/EIS should address the need for a raven monitoring program. Mitigation should involve participation in the Common Raven Management Working Group. Other utilities have agreed to provide \$105/acre to the working group. (*Desert Tortoise Council*)
- The EIR/EIS should evaluate the potential for collision and electrocution risk that the proposed transmission line may pose to birds. SCE should be required to conduct at least one full year of bird

use counts to understand bird movements for line placement and marking, and require nesting bird management plan and avian protection plan. Mitigation should be identified as needed for habitat and population of migratory birds. *(USFWS)*

- The project application identified 85 historic and active nests in the project area. The EIR/EIS may want to include mitigation that requires avoiding construction where eagles are nesting and identifies construction monitoring protocols and avoidance buffers. The EIR/EIS should also address the potential for cumulative effects of this and other projects on golden eagles. *(USFWS)*
- The EIR/EIS should include specific studies and mitigation to address possible impacts to biological resources including nesting birds/raptor, Burrowing Owl, Desert Tortoise, Arroyo Toad, Golden Eagle, bighorn sheep, Mojave Ground Squirrel, Coast Horned Lizard and Mojave Fringe-Toed Lizard, among other species.
- The southern route passes through eco-transition zone from mountain to desert, which may include interference with big horn sheep and large predators (i.e. cougars). Desert tortoise and raptors may also be affected by towers and roads. *(LVEDA)*
- The EIR/EIS must identify and analyze special habitats and high-value wildlife habitats. The document must spell out means of protecting these resources, prepare plan, and discuss feasibility of plan. *(Alliance for Desert Preservation)*
- Comprehensive inventory of the resources on public lands is required including desert tortoise, golden eagle surveys, California condors, and migratory bird issues. The Draft EIR/EIS must include an almost final Avian Protection Plan for public input. *(CBD)*
- Previous studies on similar projects may not have accurately analyzed or estimated the impact on various species like desert tortoises. For example, at the Ivanpah facility there has been larger than expected numbers of impacted tortoises and bird fatalities. *(Basin and Range Watch and other commenters)*
- Encourage long-term planning and sustainability so as not to destroy the desert ecosystem. The project area includes migratory corridors, eagles, mountain lions, and people. *(MC3)*
- Concerned about the potential for effects on bird species such as the Oregon junco that migrate to the project area along with Arger birds, which come into areas damaged by fires.
- Concerned with impacts to bald eagles, hawks, owls, bobcats, cougars, kit fox, tortoises, rattlesnakes, and wild cats.
- Mojave ground squirrel has stopped development on other projects in the area. This species should be considered and addressed in the EIR/EIS.
- The EIR/EIS should consider the potential effect that fencing used during construction may have on wildlife and the effect of construction noise on wildlife.
- With regard to high-value wildlife, the EIR/EIS should include a plan that outlines the specific protection methodology that will be used during construction.
- Approximately two-thirds of Segment 2 falls within the Northern Lucerne Wildlife Linkage, a known wildlife linkage area for the desert tortoise. The Town's MSHCP/NCCP will include assessment of mechanisms (mitigation and management prescriptions) to preserve this linkage. The EIR/EIS should include a detailed description of potential direct, indirect, and cumulative impacts of Segment 2 on the Northern Lucerne Wildlife Linkage. *(Town of Apple Valley)*
- Approximately half of Segment 7 falls within the Town's sphere of influence and its MSHCP/NCCP planning area. This segment crosses wildlife linkages such as the Granite Mountain Corridor and the Mojave River. The EIR/EIS should include a detailed description of potential direct, indirect, and cumulative impacts of Segment 7 on the linkages. *(Town of Apple Valley)*
- The proposed Desert View Substation and Alternate Proposed Desert View Substation are located

just east of the Town limits within the Town's sphere of influence and MSHCP/NCCP planning area. The EIR/EIS should include a detailed description of potential direct, indirect, and cumulative impacts of these facilities. (*Town of Apple Valley*)

## Geology and Soils

- The Desert View Substation may be proposed on or next to the potentially active earthquake faults of the North Frontal Thrust Systems and may be on soils that could be susceptible to liquefaction and/or significant instability. In the past month, the North Frontal Thrust System has had three magnitude 3.2 earthquakes. (*Juniper Riviera County Water District and other commenters*)
- The EIR/EIS should address three issues: 1) the potential effect on public safety from unstable soil that may result from the project, 2) location of the project relative to fault lines; the USGS shows the location of the substation within ½ mile of a known thrust fault, and 3) proposed route of the power lines, specifically the use of the North Peak Wind Field, may cross several additional fault lines.
- The EIR/EIS should include a third-party engineering study to substantiate any conclusions regarding liquefaction, compaction, faults, and the type of soil in the project area. (*Juniper Riviera County Water District*)
- The project area is crisscrossed with active faults and includes mineral resources and lost mines.
- Project construction could result in soil and water damage to the project area. The EIR/EIS must examine what kind of damage can be restored, by what means, and over what period of time. (*Alliance for Desert Preservation*)

## Hydrology and Water Quality

- The project may have long-term adverse impacts to groundwater resources in the project area.
- The EIR/EIS should include ungrouted rock slope protection, post-construction storm water management, minimal vegetation clearing, Restoration and Revegetation Monitoring Plan, and require retaining six inches of topsoil for final cover. (*Lahontan RWQCB*)
- The EIR/EIS should include a thorough discussion of the potential for project-related and cumulative surface and groundwater impacts. (*USEPA*)
- The EIR/EIS should address drainage patterns of the project area and identify if the project is within the 50-year or 100-year floodplain. Projects of one or more acres require a construction stormwater discharge permit. (*USEPA*)
- The BLM should coordinate with US Army Corps of Engineers (USACE) to determine if there are jurisdictional waters of the US and the need for Section 404 permit under the Clean Water Act. The EIR/EIS should describe all waters of the US that could be affected by the project and alternatives, and address impaired waters. The discussion should include maps. (*USEPA*)
- The EIR/EIS should indicate location of important wildlife habitat areas and aquatic features of surface waters and address baseline conditions, mitigation, conservation, and monitoring. The document should address avian fatalities, right-a-way vegetation management, and invasive plant species. (*USEPA*)
- The project has the potential to contaminate groundwater. The EIR/EIS should include studies that analyze the risk of groundwater contamination from construction and operation of the Desert View Substation, transmission lines, telecommunication lines, and substation upgrades. (*Juniper Riviera County Water District*)
- The EIR/EIS must evaluate all surface water resources and evaluate the project's potential to affect

these resources on- and off-site, upstream and downstream. Analysis should not end with impacts to water of the US as might be implied by the state clearinghouse. *(SWRCB)*

- The lead agencies should consult with responsible agencies on the project and the water board with regard to water quality issues and mitigation measures. *(SWRCB)*
- The EIR/EIS should include consideration of both the Lahontan and Colorado River Basin Plans and examine the potential of the project to negatively affect beneficial uses of the waters of the state. The USACE and SWRCB should be consulted when performing necessary jurisdictional determinations for surface waters within the project area. *(SWRCB)*
- Project activities may require permits from the SWRCB or RWQCB. The EIR/EIS should list the permits that may be required and identify specific activities that trigger these permits. *(SWRCB)*
- The discussion of alternatives should also identify all US and state waters that may be affected by the project. The EIR/EIS must provide full consideration and analysis of water quality impacts for all project alternatives. *(SWRCB)*
- Avoidance and minimization of project effects should be the fundamental strategy for the project such as avoiding riparian and wetlands areas, minimizing stream crossings, buffers between stream and wetlands and impervious surfaces, and compensatory mitigation for loss of ecological functions and beneficial uses. *(SWRCB)*
- The EIR/EIS should provide for inspection and monitoring for environmental compliance and require qualified inspectors. Biological monitors alone are not sufficient to meet this need. *(SWRCB)*
- Potential significant effects to aquatic resources should be evaluated using a watershed approach. Loss of functions and services of impacted water bodies should be evaluated in light of condition and abundance of aquatic resources. The assessment should consider hydrologic connectivity, hydro-modification, and access roads. *(SWRCB)*
- The EIR/EIS should require the project to implement Low Impact Development Strategies such as maintaining natural drainage paths, reducing impervious cover, and managing runoff. These measures should be incorporated in project design. *(SWRCB)*
- The EIR/EIS should describe habitat including wetland and riparian areas, and commit to habitat preservation measures that protect water quality and habitat. *(SWRCB)*
- The EIR/EIS should address the amount, sources and potential effects from use of water for construction. The local groundwater basin is in significant overdraft - contact Mojave Basin Water Master for information. *(LEVDA)*
- The Draft EIR/EIS should address ephemeral and intermittent streams and ecosystem processes. *(Center for Biological Diversity)*
- The project has the potential to increase water consumption during construction. The EIR/EIS should consider regulations similar to the ones in the Surface Mine Reclamation Act. *(MC3)*
- To address the potential need for Lake Stream Alteration Agreement, the EIR/EIS should include delineation of lakes, streams, and associated habitat that could be impacted by the project, and address mitigation to reduce impacts. *(CDFW)*
- The EIR/EIS must fully evaluate potential impacts to water quality and hydrology from access road construction. Natural drainage channels should be maintained and stream channels clear-spanned to minimize impacts. EIR/EIS should list the beneficial uses of the water resources in the project area and include analysis of potential impacts to water quality and hydrology. Use water quality objectives and standards to evaluate thresholds of significance for project impacts. Project may require permits such as streambed alteration and NPDES. The specific project activities that trigger a permit should be identified in the EIR/EIS. *(Lahontan RWQCB)*

## 4.6 Cumulative Impacts

- The EIR/EIS should address cumulative effects that could result from past, current, and probable future projects. The analysis should capture other electric transmission line projects proposed in the project area and Southern California as well the renewable energy projects that are anticipated in the project area and that may rely on the CLTP. The project has the potential to encourage the development of utility-scale renewable energy projects and these projects need to be addressed in the EIR/EIS. (*Marine Corps Air Ground Combat Center, SWRCB, and other commenters*)
- Cumulative projects may affect desert ecosystems and groundwater resources thereby causing reliance on imported water, public health, contamination of groundwater, erosion and scarring, which is observable in the Lucerne and Victor Valleys from past projects, and wild land fire-fighting methods in the surrounding mountain and valley communities. (*USEPA and other commenters*)
- The EIR/EIS must consider cumulative effects on visual resources, biological resources, air quality and water as well as non-native plant species introduced to project area and numerous environmental values to be compromised. (*Alliance for Desert Preservation*)
- The EIR/EIS must consider the cumulative impacts associated with the project including the solar and wind energy projects that could result from approval of the CLTP. Consider air quality, environmental justice, valley fever, water use, and biological resources (e.g. bird mortality, desert bighorn sheep, desert tortoises, golden eagles, Mojave ground squirrel, Ford's Indra swallowtail, kit fox, and wildlife connectivity).
- The EIR/EIS should consider other projects like the Twenty-Nine Palms Marine Corps proposed 180,000-acre expansion and the DRECP. The analysis should also address whether the project is covered in DRECP. (*Desert Tortoise Council*)
- Draft EIR/EIS must include a comprehensive analysis of cumulative impacts to desert resources from renewable energy, transmission, military expansion, and other development projects. (*CBD*)
- The CLTP and the future influx of commercial industrial-scale renewable energy generation projects could have a negative permanent impact and may completely alter the area. (*MC3*)
- The EIR/EIS should include an analysis of the cumulative and secondary effects from construction noise and air quality associated with OHV use.
- The cumulative analysis should address the County of San Bernardino Renewable Energy Element to the General Plan, the DRECP, and WEMO (West Mojave Plan Amendment). The DRECP references designated focus areas, which includes the project area.
- The cumulative analysis should include the Tapestry project (Las Flores Ranch) in Summit Valley where a developer plans to build 20,000 homes in an area that includes the last western region for western pond turtles. The analysis should also identify if the Tapestry project is in any way connected to CLTP as these homes will need energy.

## 4.7 Project Alternatives

- The EIR/EIS should include a robust range of alternatives including alternative transmission line routes, substation locations, and access road configurations as well as alternatives that could address environmentally sensitive areas or areas with potential land use conflicts as well as protection of wildlife, cultural resources, and open space. (*USEPA and other commenters*)
- The EIR/EIS should include a clear statement of objectives that considers the potential for future renewable energy projects to result from CLTP and that includes alternatives that take this future development in consideration. There are 40 renewable energy applications in process. Let's put



these projects in the built environment where the energy does not need to be transferred. (*Alliance for Desert Preservation and other commenters*)

- Project alternatives should be developed that are compatible with the DRECP and that considers power conservation as well as protection of desert resources (i.e. water, biological resources, and other resources). (*Defenders of Wildlife and other commenters*)
- Are utility-scale projects appropriate on public lands and if so how much can be built without a CDCA amendment? (*CBD*)
- **No Action Alternative.** The EIR/EIS should include serious consideration of the No Action Alternative. At a renewable energy workshop, the agencies confirmed that the state has met its renewable energy goal therefore the EIR/EIS should consider the need for the CLTP. (*Alliance for Desert Preservation, Basin and Range Watch, and other commenters*)
- **AV Clearview Alternative.** The EIR/EIS should include the AV Clearview project as an alternative to CLTP. The CPUC's or CAISO's initial rejection of the AV Clearview project may have not been based on substantive resource data or rationale. Also, this alternative may be cheaper, simpler, and could have less negative environmental impacts. The project should be placed closer to where the power will be used such as the City of Lancaster, which is closer to Los Angeles. (*LVEDA, Alliance for Desert Preservation, MC3, and other commenters*)
- **Substation Alternatives.** The EIR/EIS should include alternatives to the proposed Desert View Substation. These alternatives could include modifying or upgrading an existing substation in lieu of constructing a new one, or locating the proposed substation at a site that is currently zoned for industrial use or is not near residences. An alternative location could include the site on the west of Rabbit Dry Lake for the project; SCE owns 1/3 of the property and this property has adjacent power lines. The size of the station needs to be reduced and rationale for the need for a 160-acre area should be addressed. The Desert View Substation could be built on the huge dry lake bed in Lucerne. (*USEPA and other commenters*)
- **Summit Valley.** The agencies should consider implementing the alternative route that goes through Summit Valley. It could reduce impacts to residents near the existing corridor.
- **Distributed Generation.** The EIR/EIS should include distributed energy generation alternatives such as solar panels on rooftops, solar PV projects located as shade structures in parking lots, ground-mounted PV at waste water treatment plants, solar PV on remote brownfields, land fields and remediated sites, micro grids similar to what is being done at military bases, and cooperative solar energy production. Rebates and incentives should be increased to promote more extensive use of solar on existing residential and industrial rooftops, which could then greatly reduce the need to create and transport power from remote locations. (*HVCC, MC3, and other commenters*)
- **Net Zero.** The agencies should consider Net Zero energy requirements and look at alternatives like natural gas, nuclear power and private Point-of-Use solar.
- **Military Operations.** The EIR/EIS should identify alternatives that address airspace and tower height and location. (*MCLB and Marine Corps Air Ground Combat Center*)
- **Underground Project.** The assessment should consider undergrounding the project instead of overhead transmission lines and structures. To reduce the potential for health effects and if the lines have to go in the current proposed route then they should be placed underground. Commenters believe it is not fair to property owners who accepted the existing conditions to now ask them to accept larger towers. (*USEPA and other commenters*)
- **Highway 247.** The alternative along Highway 247 (Barstow Rd.) could have the most scenic impact, and a corridor east of Hwy 247 may pass through a designated Area of Critical Environmental Concern. (*LVEDA, HVCC, and Scenic Highway 247 Committee*)

- **Kramer to Lugo.** The EIR/EIS should consider a direct alternative from Kramer to Lugo, which could have less growth inducement of renewable energy development on sensitive desert tortoise habitats around Barstow compared to the proposed project. Alternatives such as congestion management at Kramer and Lugo substations and upgrades to existing transmission lines to increase capacity. The EIR/EIS must also consider alternatives that are compatible with the DRECP. These alternatives may resolve bottleneck and preclude need for project. (*Defenders of Wildlife*)
- **Minimize Use of Public lands.** The EIR/EIS should identify an alternative that avoids new impacts to public lands, particularly those in the Ord-Rodman DWMA such as an alternative along Highway 247 between Segment 1 and Barstow to Lucerne Valley and one that coincides with Interstates 40 and 15 between Daggett and Hesperia. The assessment should consider whether the project could be built without a CDCA plan amendment. (*Desert Tortoise Council*)
- **SCE Alternatives.** The EIR/EIS should analyze SCE's Alternative 9 and Alternative 3. One commenter asked for all SCE alternatives to be evaluated in the EIR/EIS. Some comments also addressed concern with SCE alternatives such as stating that these alternatives were minor adjustments of the preferred alternative and did not effectively address the project's impacts to the desert and wildlife. Alternative 9 is proposed adjacent to lands designated for single-family residential development in the Barstow General Plan. This alternative could have adverse impacts on visual resources, lands and realty, and safety and national security (Marine Corps Logistics Base) impacts. (*Desert Tortoise Council, Basin and Range Watch, and MCLB*)
- **Upgrade Existing lines.** The EIR/EIS should include alternatives that upgrade existing lines and routes and that secure existing grids from electromagnetic attack. A potential alternative could be to have an alignment along the I-40/I-15. This alternative may achieve most of the project's purpose and need and may reduce environmental impacts (e.g. wildlife). (*Defenders of Wildlife, California Desert Coalition, and CBD*)
- **Industrial Energy Zones.** The EIR/EIS should use industrial energy zones that are supported by the community. The Lucerne Valley has designated six-square miles of wasteland naturally shielded from view by desert vegetation to house solar farms.

## 4.8 Growth-Inducing

- The project has the potential to open the door to other large-scale wind and solar projects that must be considered when evaluating the CLTP. (*Basin and Range Watch and other commenters*)
- The EIR/EIS should address the potential for indirect effects from the project. For instance, improved access to transmission lines may induce growth on surrounding lands. (*USEPA*)
- The EIR/EIS and plan amendment should thoroughly consider the indirect and secondary, growth-inducing, and cumulative effects of the project. The project has the potential to enable utility-scale renewable energy projects. CEQA requires that these types of issues be addressed in the EIR/EIS: "an indirect physical change in the environment...which is not immediately related to the project, but which is caused by the project" [section 15064(d)(2)]. (*Alliance for Desert Preservation*)
- The EIR/EIS must analyze growth-inducing nature of the project on desert tortoise, water resources, and aesthetics, and the potential for health effects, fire, and radiation (from solar thermal projects). (*Desert Tortoise Council, Defenders of Wildlife, and other commenters*)

- The EIR/EIS should analyze the growth-inducing impacts associated with all alternatives. It is misleading to portray as a point-to-point project when it could function as transmission infrastructure for numerous future wind power and solar projects. The EIR/EIS should disclose all renewable projects supported by the CLTP and include acreages and baseline surveys for these anticipated projects. (*Desert Tortoise Council*)
- The CLTP and the future influx of commercial industrial-scale renewable energy generation projects could have a negative permanent effect and could completely alter the area. The EIR/EIS should address the need for and the long-term effects of the project and future projects. (*MC3 and California Desert Coalition*)
- Construction of the project could open the floodgates for industrial solar and wind projects and turn the desert into a wasteland. The project may enable the North Peak Wind project, which could then limit the ability of firefighters to use aerial firefighting methods. All of the related projects could bring about the potential destruction and dislocation of wildlife native to the area.
- The potential for windmills/wind farm may have health effects. The commenter noted that the Holistic Horse had an article about the negative effect of wind farms on horses.
- The “green energy push” may bring dozens of projects to the area waiting for the transmission line to be built. The project may turn the desert into a giant power plant to feed Los Angeles and could result in wind projects all over the desert. The wind turbines restrict airplanes and often burst into flames, which could affect homes in the area. Aerial fire-fighting efforts could be impaired from new no-fly zone areas created by the large wind turbines. (*MC3 and other commenters*)
- Water quality and quantity needs to be considered because some of these anticipated projects may require significant amounts of water. Groundwater, a scarce resource, has been used in enormous quantities by many utility-size renewable energy projects. This environmental impact has been neglected, ignored, and even denied by many renewable energy developers, resulting in great damage to our desert.
- The project is only meeting LA’s needs of energy consumption as well as potentially encouraging other projects to come to the area. These (wind) projects may result in the loss of 275,000 birds a year, may bring additional roads, may destroy wildlife, and may impede emergency response (restricts airplane flights).
- The substation could be placed in the middle of the Lucerne Valley community. If SCE is allowed to build a substation it could bring more projects to the area, and these projects could be here for 30 years or more. The desert may never recover. More projects may also bring more lights that could be visible miles away.
- With all of the power going in the substation, at some point in the future there may be a need to upgrade the other side of the substation and associated lines to increase capacity of the station. Power going into the substation needs to go somewhere.
- The CLTP has the potential to cause the installation of wind turbines, which may create a wide no-fly zone that could jeopardize the safety of individuals residing in that area of the project if a fire or health issue arose.
- The project may enable and encourage the construction of utility-scale renewable projects, which could draw massive quantities of water. This has not been adequately studied for other projects and needs to be considered in the EIR/EIS.
- The project will set a precedent for other types of renewable energy projects which will turn the desert into a wasteland.
- CLTP will encourage the development of other projects such as “giant windmills,” and the project will include very tall towers, some of the 500 kV towers will be 260 or 240 feet high.

## 4.9 General EIR/EIS Issues and Public Noticing

### General Comments

- Understands the format for submitting comments, but believes there is no public forum for asking questions and getting answers. This issue has not been properly addressed.
- Current maps were done very poorly; they do not show anything. The maps do not show the street names, which is confusing.
- The EIR/EIS should clearly discuss which impacts cannot be mitigated to a less-than-significant level. Some impacts cannot be mitigated and the EIS/EIS should identify them.
- The EIR/EIS should discuss the project in the context of the larger energy market it could serve and discuss how the project may assist the state in meeting their renewable energy standards and goals.
- Project impacts should be clearly communicated with the residents of the High Desert area.
- The project may not conform to the Energy Transmission Initiative's EA, which recommends projects to utilize the most cost-effective measures with the least impact on the environment.
- Many citizens of the Town of Apple Valley have expressed concern with potential project impacts on the Town and its sphere of influence. The EIR/EIS should provide a thorough, unbiased, clear, and accurate description of the project and its potential impacts. (*Town of Apple Valley*)

### Public Noticing

- The notification placed by the SCE to the public was a small flyer found lying down on the desert floor far away from the 300 feet of affected people; SCE never informed the community with a mailing about the application they submitted on the project.
- Notification of the project through the use of a sign on a road is not an effective way to notice the project. Proper notification has not been provided to the public. [*This bullet and the one above were not part of the EIR/EIS notification for the CLTP project.*]
- The agencies should change the noticing requirement in the desert from 300 feet to 25 miles because in the desert the view of facilities extends 50 miles or more.
- Many residents use PO Boxes because the US Postal Service does not always extend service to certain areas of the desert. Therefore, mailings sent to physical addresses may not be received by the intended recipient.

## 4.10 Issues Outside the Scope of the EIR/EIS

- Over 600 letters were submitted in opposition to the project; the majority of these letters were form letters. The comments related to project-related impacts have been considered and incorporated in this document. However, any issues associated with the opposition to the project have not been addressed as the EIR/EIS is an information document not a decision document. Appendix F-3 includes the form letters and a list of names of the individuals that signed/submitted these letters.
- Several commenters noted that 15,000 comment forms were submitted to the BLM in opposition to the project. These petitions were not reviewed for this scoping report.
- Concerned that the residents or human beings are not considered key players when considering the impact of the project and asked what percentage of residents and property owners in the area would be necessary to have their concerns addressed.
- National Parks Conservation Association requests that SCE and the DRECP staff work with local

communities to consider concerns of the CLTP. The Association also requests that SCE and BLM not only listen to stakeholder concerns but integrate them into the decision-making process.

- Concerned with stability of the grid and wants the EIR/EIS to include examination of natural gas components added to wind and solar generating stations. The commenter believes that utilizing natural gas to help stabilize the grid is contrary to solving energy problems.
- Concern with BLM allowing use of public land for development of energy projects. Fast-tracking permits for solar companies and giving them money to develop these projects is a concern.
- Some commenters asked the audience at the public scoping meetings to get engaged, perform good due diligence and make comments on the potential environmental impacts of the project. The commenter reiterated the purpose of the EIR/EIS and asked that the audience consider the potential for growth-inducing and cumulative impacts and emphasized that they should let the agencies know that they do not want future renewable energy projects.
- Commenter believes SCE was secretive about the plans for this project with their preliminary planning efforts by not disclosing what they were doing as they studied residential properties.
- Residents have been misled. They bought the idea of not relying on coal and using gas and allowing solar power but now there are all these power plants in the desert that require transmission lines to take the power “down the hill.” No one mentioned that transmission lines would be needed.
- Request moratorium on current and proposed projects until the County hears from us and formulates an acceptable renewable energy code.
- The project should not be approved before the DRECP. BLM should take the region out of the DRECP development focus area designation.
- MC3 will vigorously oppose the Department of the Interior amendment to the California Desert Conservation Plan.

# 5. Next Steps - EIR/EIS and Project Review

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An important part of the environmental review process is to engage the public and public agencies early-on to effectively address issues, comments, and concerns in the EIR/EIS as was done through scoping for the CLTP. While scoping is the initial step in the environmental review process, additional opportunities to comment on the CLTP EIR/EIS will be provided. The CPUC and BLM will provide for additional public input when the Draft EIR/EIS is released, and during public meetings for the Draft EIR/EIS. Figure 1 presents a schedule for the EIR/EIS, and identifies where in the process the public and agencies can provide additional input in the environmental review process. The figure also shows that the decisions on the federal and state applications will be made after completion of the EIR/EIS.

**Figure 1 Project Review and Timeline**

