Comment Set B7
Desert Southwest Transmission Project

Devers–Palo Verde No. 2 Transmission Line Project

From: Bob Mooney [Bob@PMALLC.net]
Sent: Friday, August 11, 2006 12:54 PM
To: dpv2@aspeneg.com
Cc: John Kalish
Subject: Midpoint Switching/Substation Location -- DPV2

August 11, 2006

CPUC/BLM

Desert Southwest Transmission Project ("DSWTP") has worked with Southern California Edison to analyze the site chosen for the DSWTP Midpoint. The DSWTP Midpoint Site is acceptable for the regional needs of Blythe Energy, SCE and DSWTP. DSWTP encourages the DPV2 Final EIS/EIR to designate that location for Midpoint. B7-1

Thank you for the opportunity to comment.

Bob Mooney
Project Director
208 890 0369

Responses to Comment Set B7
Desert Southwest Transmission Project

B7-1 The DSWTP Midpoint Substation site was fully analyzed in the Draft EIR/EIS as a component of the Desert Southwest Transmission Project Alternative (see Appendix 1, Section 4.4.1). Analysis of this alternative within each issue area (Sections D.2 through D.14 was based on information provided in the DSWTP's Final EIR/EIS in which the revised Midpoint Substation was identified. Therefore, as an alternative fully analyzed in this EIR/EIS, the DSWTP Midpoint Substation site could be approved as a component of the DPV2 Project by the CPUC and BLM. As a result, the Final EIR/EIS (Section E.has been modified to state that both locations of the Midpoint Substation are equally environmentally preferable. The following text has been added at the end of Section E.2.1.3 (Desert Southwest Transmission Project Alternative).

Midpoint Substation Location

The DSWTP Final EIR/EIS considered a different location for the Midpoint Substation (herein called the Midpoint-DSW Substation), as illustrated in Figure Ap.1-11 in Appendix 1 (Alternatives Screening Report). In a comment on the Draft EIR/EIS, the DSW proponents asked that the CPUC and BLM consider designation of this substation location as an acceptable location for SCE to interconnect with the DSW transmission line from the Blythe power plants.

The Midpoint-DSW Substation was fully analyzed in this EIR/EIS as a component of the DSWTP, and was found to be comparable to the Midpoint Substation location identified by SCE. Both sites are on BLM land, and no significant environmental impacts would result from construction of a substation at either site. As a result, this EIR/EIS concludes that the two sites are comparable, and equally environmentally superior/preferable.

In addition, Section E.2.3 has been modified as shown below.

E.2.3 Definition of Environmentally Superior/Preferred Alternative and Agency Preferred Alternative

The conclusions in Sections E.2.1 and E.2.2 for various alternatives result in the following environmentally superior alternatives and the BLM agency preferred alternatives:

- Harquahala Junction Switchyard (the project would begin at this point)
- Proposed Project route from Harquahala Switchyard to east of Alligator Rock
- Alligator Rock–North of Desert Center Alternative to west of Alligator Rock
- Proposed Project route from west of Alligator Rock to Devers Substation
- The SCE Midpoint Substation and the Midpoint-DSW Substation are equally environmentally superior/preferred
- Proposed West of Devers upgrades unless determined to be infeasible, in which case the Devers-Valley No. 2 Alternative would be constructed.

The Environmentally Superior/Preferred transmission line route is illustrated in Figures E-1a and E-1b.

Section 5.2.1 of the Executive Summary has been modified as follows:

Conclusion: The Proposed Project is preferred over the DSWTP because it would require less ground disturbance and construction of fewer substations. However, the Midpoint-DSW Substation location would have impacts that are comparable to those of the SCE Midpoint Substation location (no significant impacts at either site, and both sites are on BLM land). As a result, the two substation locations are considered to be equally environmentally superior/preferable.

Comment Set B8
Sierra Club, Grand Canyon Chapter

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August 11, 2006

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B8-2

Dear John Kalish and Billie Blanchard:

I am writing these comments on the *Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers-Palo Verde No 2 Transmission Line Project* (EIR/EIS) on behalf of the Sierra Club's Grand Canyon Chapter and our more than 13,000 members in Arizona. The Sierra Club's purpose is to explore, enjoy and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments. Our members use and enjoy many of the public lands along the proposed route and the alternate routes. Our members also have long been involved in protecting the habitat and the wildlife and wildlands along these routes. The Sierra Club has a significant interest in this proposed action. Our comments focus on the project location and impacts in Arizona.

The costs of this project to the environment are far too high in comparison with the benefits to the public, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project.

The Devers-Palo Verde No 2 (DPV2) transmission line will further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone this proposed new 500 kV is incompatible with the mission of the refuge and should be rejected. The Proposed Project location in the KOFA includes prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge. For this and other reasons outlined below, the Sierra Club urges selection of the No Project/No Action Alternative.

Purpose and Need:

We strongly question the need for this power transmission line. According to the Draft Environment Impact Report/Environmental Impact Statement (EIR/EIS), ". . . the DPV2 project is primarily driven by the need to provide additional high-voltage electrical transmission infrastructure to enhance competition among energy suppliers, and increase reliability of supply, which will enable California utilities to

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reduce energy costs to customers by about $1.1 billion over the life of the project." It goes on to say that basically it will allow them to access low cost energy outside of California. B8-2 cont.

Southern California Edison's objectives include:

- Increase California's Transmission Import Capability
- Enhance the Competitive Energy Market
- Support the Energy market in the Southwest
- Provide Increased Reliability, Insurance Value, and Operation Flexibility

The draft EIR/EIS makes it clear that the purpose of the Proposed Project is economic benefits to Southern California Edison (SCE). These economic benefits may or may not be passed along the SCE customers. On page C-61, it states:

> "The economic context of the Proposed Project means that DPV2 is primarily driven by SCE's desire to reduce energy costs to California customers, not by a need for improved reliability."

Irrespective of that, this proposed transmission line has been on the books for over 15 years and California has gotten along just fine without the new power line. While some might point to the rolling blackouts in California several years ago as an example of why this is needed, it is quite clear that those rolling blackouts in 2001 were not due to the lack of transmission, but were caused by manipulation of the energy market ala Enron. According to the *Christian Science Monitor*, "FERC investigators say Enron and other energy traders engaged in "gaming" the system in order to inflate prices. The agency found that Enron's famously Byzantine strategies involved deceit and purposely false information." (August 19, 2002 edition) *The New York Times* indicated similar problems, "In the midst of the California energy troubles in early 2001, when power plants were under a federal order to deliver a full output of electricity, the Enron Corporation arranged to take a plant off-line on the same day that California was hit by rolling blackouts, according to audiotapes of company traders released here on Thursday." (February 4, 2005)

While this line may accomplish some of the objectives for California, it is certainly questionable whether the proposed line would benefit Arizona in any way. This line is likely to actually result in higher costs to Arizona ratepayers. For how long will there actually be excess energy in Arizona to export to California? Phoenix is the fifth largest city and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to bring power to California?

Arizona Public Service Company indicates in a June 2, 2006 letter to Arizona Corporation Commissioner Kris Mayes that the company's load is growing at approximately 4% per year – that is around 300 megawatts per year. The letter states, ". . . if you assume that APS, Salt River Project, and Tucson Electric Power were to acquire all of their additional needs from the assets around the Palo Verde hub, the utilities would grow into the uncommitted capacity in the 2010-2011 timeframe."[1] This line is scheduled to be ready sometime in 2009. Is it worth further degrading Arizona's environment, an important wildlife refuge, other public lands and increasing air emissions in Arizona so Southern California Edison can buy and sell this electricity only two years before Arizona utilities are at a point where they are likely to absorb it? B8-3

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As we indicated in our scoping comments, the stated objectives could be better accomplished by investing in conservation, efficiency and renewables. Certainly, the negative environmental impacts would be fewer. We asked that this be analyzed as an alternative in the draft Environmental Impact Statement for this project. It was not adequately analyzed and instead was only given a cursory look, but no real analysis. The assumptions about the impacts of conservation, efficiency and additional renewables were not well developed and the accuracy is questionable.

B8-3 cont.

According to the Natural Resources Defense Council and Environmental Defense Fund:

> "California is rich in renewable resources, such as wind and solar, that offer abundant opportunities to generate clean electricity. California was an early leader in developing renewables, which now provide about 11% of the state's electricity. By increasing renewable energy to 33% of our power mix, California can protect consumers from increasingly volatile natural gas prices and cut pollution emissions."[2]

This was not addressed in the draft EIR/EIS.

The draft EIR/EIS mentions that a No Action/No Build Alternative will mean there will be more focus on distributed generation and suggests that the visual and biological impacts from this could be great. There is no analysis or documentation to support this. Also, there is no analysis of what building the line will do to efforts to promote local distributed generation like clean renewable solar energy.

Also according to NRDC, nearly half of California's power plants are more than 30 years old. If these plants were re-powered with new technology it could make them as much as 15% more efficient. Increasing the number of plants that utilize combined heat and power would also increase efficiency.[3] Clearly there are significant opportunities to meet the needs in California without this transmission line.

Recently, Southern California Edison announced that it was not planning to continue operation of the Mohave Generating Station, a plant the company decided to close on December 31, 2005 because SCE had not installed adequate pollution-control equipment. With that decision, doesn't it mean there is some additional capacity on the lines coming to California from southern Nevada?

B8-4

Alternatives:

The Council on Environmental Quality's National Environmental Policy Act (NEPA) regulations require that the alternatives section rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reason for their having been eliminated. While an agency is not required to consider every possible alternative, it must consider reasonable alternatives "necessary to permit a reasoned choice." Headwaters, Inc. v. Bureau of Land Management, 914 F.2d 1174, 1180-81 (9th Cir. 1990).

There are reasonable alternatives to this line that have not been adequately considered, rigorously explored or objectively evaluated. California can help meet its energy needs and provide more stability for their energy supplies by focusing on energy efficiency and conservation programs. These are the least costly and most reliable ways to reduce demand. California can also consider additional investments in environmentally-friendly, renewable, and sustainable energy sources such as solar and wind.

On page ES-14 it states:

B8-5

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> "…CEQA Guidelines require considering of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of project objectives or would be more costly" (CEQA Guidelines Section 16126.6(b))"

B8-5 cont.

Energy efficiency and clean renewable energy technologies are cheaper and better solutions than investing in more fossil fuel plants and long transmission lines. A recent study from UC Berkeley demonstrated that investment in renewable energy and energy efficiency creates more jobs than does investment in fossil fuel generation.[4]

On Tuesday, Dec. 13, 2005 the California Public Utilities Commission (PUC) unveiled its version of the Million Solar Roofs program, called the California Solar Initiative. (See http://www.cpuc.ca.gov/PUBLISHED/COMMENT_DECISION/51992.htm) The initiative proposes an 11-year, $3.2 billion incentive program to install 3,000 megawatts of solar on a million homes, businesses, farms, schools and municipal buildings. This program and a future expansion of it could also help meet the needs of consumers in California.

According to the U.S. Department of Energy, our total solar electricity generation capacity in the U.S. is approximately 1 million megawatts[5]. Wind can and must also be an important part of the mix. In reviewing wind maps, there are many places in California that are ideal for generating electricity from wind. This technology is currently providing reliable electricity at costs competitive (4-6 cents per kWh) with traditional energy generation throughout the U.S.[6] Countries like Denmark already generate 20% of their electricity from wind.[7]

The draft EIR/EIS failed to adequately address these alternatives. Furthermore, it did not adequately address efficiency and conservation coupled with distributed solar generation. This would reduce the need for additional transmission lines. The EIR/EIS instead asserts that additional transmission lines will be needed for these alternatives and that the environmental impact will be.

On page ES-31, it states:

B8-6

> "These technologies also would cause environmental impacts and have feasibility problems. Use of renewable generation technologies would avoid the specific impacts associated with the construction and operation of the proposed DPV2 project, but new transmission would still be required from the renewable generation locations, creating impacts similar to those of the Proposed Project, which is proposed to transmit power from an already *existing* generation source."

It is unclear how long the Proposed Project would be transmitting power from an existing generation source. APS has indicated its plans to expand Palo Verde Nuclear Generating station and at the rate Arizona is growing, it is clear that the excess power will be used in no time.[8] As stated previously, distributed solar generation coupled with efficiency and conservation can reduce or eliminate the need for additional transmission lines.

The Council on Environmental Quality guidance indicates that a Record of Decision for an EIS must specify which alternative is "environmentally preferable." This guidance goes on to state that "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources."

B8-7

On page E-15 of the draft EIR/EIS it concludes:

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> "Therefore, because the No Project Alternative could also require construction of transmission lines with impacts similar to those described for the Proposed Project, as well as impacts of generation sources, the No Project Alternative is not found to be superior to the Environmentally Superior Alternative as defined in Section E.2.3 [of the EIS] above."

B8-7 cont.

This assertion makes a great and unsubstantiated leap. The identification of the Environmentally Preferable Alternative rests on speculation and general assumptions that are not a legitimate part of the No Action/No Project Alternative. It is not a given that there will be additional lines in more sensitive areas if this project does not move forward. On page C-65 of the draft EIR/EIS, it states:

> "Without alternative plans or sponsors for alternate facilities, it would be speculative to assume that any specific transmission or generation projects are foreseeable under the No Project Alternative."

We agree. How can the draft EIR/EIS then assume that the No Project Alternative would be more harmful to the environment? The No Action/No Project Alternative is clearly the alternative which best protects the environment. It should be identified as the Environmentally Preferable Alternative as indicated by the CEQ.

The draft EIR/EIS fails to adequately consider placing the power line underground. This discussion was cursory, at best. There is no real analysis of the relative environmental impacts nor an analysis or discussion of placing an underground segment through the KOFA National Wildlife Refuge. Burying this line and the existing line would reduce the visual impacts, the noise impact, and over time, the on the ground impact. The short-term construction impacts would likely be greater, as the draft EIR/EIS indicates, but that does not mean the long-term impacts will be as great.

B8-8

The Proposed Project route is not an environmentally friendly route, but the alternative routes would cause enormous damage as well. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project.

Environmental Impacts:

The Proposed Project is incompatible with the KOFA National Wildlife Refuge: The Proposed Project route for this transmission line would cut through the KOFA National Wildlife Refuge. The KOFA (after King of Arizona Mine) National Wildlife Refuge was created in 1939 and contains 665,400 acres of desert habitat. The KOFA Wilderness area was created in 1990, after the first line was installed, and is approximately 516,300 acres in size. While there was a clause in the Desert Wilderness Act that excluded a right-of-way for the second line to cross the KOFA Wilderness, the Sierra Club has always considered this incompatible with the wilderness and with the refuge. "The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management and where appropriate, restoration of the fish, wildlife and plant resources and their habitats with the United States for the benefit of present and future generations of Americans."[9] Under no circumstances is this transmission line compatible with that mission.

B8-9

The DPV2 transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 kV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep

B8-10

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and desert tortoise habitat. The line will also obstruct the natural view of the area which is pristine desert landscape.

B8-10 cont.

The KOFA National Wildlife Refuge is especially important desert tortoise habitat because it is contiguous with the Yuma Proving Ground and together they provide a larger protected habitat for Sonoran desert tortoise.

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

B8-11

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

The Proposed Project would clearly violate the *Kofa National Wildlife Refuge & Wilderness and New Water Mountains Wilderness Interagency Management Plan*,[10] as indicated on Table D.3-6 on page D.3-39 of the draft EIR/EIS. It states:

B8-12

> "The Proposed Project would result in the placement of new structures within the Refuge, which would adversely affect views from Crystal Hill Road and Pipeline Road. The new structures would cause a noticeable increase in the structure prominence and industrial character and would result in a moderate-to-high degree of additional view blockage of the background Livingston Hills. The construction of new or use of existing access and spur roads may also result in increased land scarring. Therefore, the project would not be consistent with the objective of maintaining or enhancing the wilderness values of naturalness by minimizing visual impacts of development."

The draft EIR/EIS neglects to include the same plan in its Table 5-3 on pp. D.5-22 to D.5-24, where consistency with wilderness and recreation plans and policies are assessed. This is a significant oversight.

Overall, the draft EIR/EIS makes it clear that the Proposed Project is in no way compatible with the Refuge and the impacts to visual resources and wildlife are significant and are **not** mitigable impacts. The negative impacts to wildlife in this wildlife refuge whose main purpose is the conservation, management, and restoration of wildlife cannot be mitigated.

The Proposed Project would negatively affect Air Quality in Arizona: Page ES-22 and ES-23 acknowledge that there will be increased emissions for Arizona under every alternative except the No Project Alternative. It states:

B8-13

> "Reducing generation from older and less efficient power plants in California and increasing generation from higher-efficiency power plants outside of California would provide an air emission decrease in California, but an emissions increase in Arizona. Under the No Project Alternative, these power supply changes and emission benefits would not occur."

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On page D.11-38 it states:

> "The California Independent System Operator (CAISO) forecasts that emissions from power plants would increase in Arizona and decrease in California with implementation of the Proposed Project (CAISO 2005)."

The draft EIR/EIS illustrates the environmental downside of this proposed project for Arizona in several ways. On page A-9 it discusses the power plant construction boom. It states:

> "Merchant power plant developers have been attracted to Arizona by the availability of natural gas infrastructure, the low cost of land, and a favorable regulatory environment."

On page A-13, the draft EIR/EIS makes it clear that the lower regulatory standards in Arizona make it attractive as an energy colony for California. It states:

> "Because the southwest has less expensive permitting, land, emission-offset, and labor expenses, the CAISO estimated the fixed costs of a new combined-cycle plant to be about 13 percent less in Arizona than in California."

It goes on to say that operation costs are expected to be about 10 percent lower than in California due to lower natural gas costs. The draft EIR/EIS does not indicate that due to the volatility and higher gas prices, several utilities in Arizona are looking at coal and even expanded nuclear generation.[11]

While the draft EIR/EIS discusses the increase in air emissions for Arizona and estimates that nitrogen oxides would increase by 200 tons, it does not adequately address the increased air emissions or other environmental impacts if the additional generation were to come from new coal or nuclear. Traditional coal-fired power plants have significantly more emissions than gas-fired plants. Increased nuclear generation comes with another set of environmental concerns.[12]

B8-13 cont.

The draft EIR/EIS fails to adequately address the indirect impacts of the Proposed Project on Arizona water: No where does the draft EIR/EIS discuss the increased use of water for the operation of any of the power plants that will be necessary if this line is built and what that additional generation will do to water supplies for the state of Arizona. Most of the merchant gas-fired power plants in Arizona have been built outside of Active Management Areas where controls on groundwater pumping are non-existent. Older gas-fired power plants using a once through wet-cooling system use about 20 gallons per kilowatt-hour, 50 gallons per kilowatt-hour for fossil fuel, and 60 gallons per kilowatt-hour for nuclear.[13] According to California Energy Commission, a 500 MW thermal combined cycle gas-fired power plant in California may consume from 2,000 to 4,000 acre-feet of water per year.[14] The Commission indicates that the use of dry cooling reduces the annual plant water requirements by about 2,000 to 2,500 acre-feet per year, depending on the climate at the plant location.

Water has been an issue in the siting of several power plants that have come before the Arizona Corporation Commission including two that were denied approval of their Certificate of Environmental Compatibility – the Big Sandy, a 720 Megawatt gas-fired plant, and the Toltec, an 1,800 Megawatt gas-fired plant. Toltec would have used about 10,000 acre-feet of water per year and the Big Sandy would have used about 5,267 acre-feet each year. Based on the draft EIR/EIS, additional transmission will create the need for generating more electricity which will use more water. Failure to address this in this draft is a major oversight.

B8-14

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The environmental impacts including the cumulative impacts of the Proposed Project are significant and unmitigable: The draft EIR/EIS downplays the negative effects of a second power transmission line by asserting that environmental quality has already been degraded by the first power line. While there is no mistaking that there have been negative impacts from Devers 1, the draft EIR/EIS makes is clear that the second power line will contribute to significant degradation of the environment. On page F-45, it states: B8-15

> "The DPV1 transmission line was constructed across or adjacent to recreation areas in La Paz and Maricopa Counties in Arizona, and Riverside County in California, including the Kofa NWR, Chuckwalla Valley Dune Thicket ACEC, Alligator Rock ACEC, and the Coachella Valley Preserve and Coachella Valley Fringe-Toed Lizard ACEC. Adding the Proposed Project to this existing corridor would intensify the industrial development that crosses these recreational resources. Any additional projects that may traverse these recreational areas (see Table F-1) would further increase the industrial development and further reduce the undeveloped, natural landscape of the recreational areas. As significant impacts have already occurred to the character and recreational value of the recreation areas located along the DPV1 line (BLM, 1979), operation of the Proposed Project, alone or in conjunction with other Proposed Projects, would contribute to a significant, cumulative effect to established recreation areas (Class I)."

Visual Resources B8-16

According to the draft EIR/EIS, the negative visual impacts in the KOFA National Wildlife Refuge would be significant and unmitigable (page ES-38). It states:

> "Of the 14 key viewpoints that were established along this route segment, two would be exposed to significant unmitigable visual changes. These significant impacts would occur in KOFA National Wildlife Refuge and at Alligator Rock ACEC."

Negative visual changes in the Harquahala Mountains where a telecommunications site would be constructed for the project, would also be significant and unmitigable (See Table D.3-9 on page D.3-58). The proposed structure is inconsistent with the Bureau of Land Management's VRM Class II management objective outside the adjacent wilderness area and inconsistent with the VRM Class I management objective when the telecommunications site is viewed from within the wilderness.

Wilderness and Recreation B8-17

Wilderness and recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42) Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well. On page D.5-28 of the draft EIR/EIS, it states:

> "Development and operation of the project would change the character of the Kofa NWR and significantly diminish its recreational value. Impacts to the Kofa NWR would be significant and unmitigable (Class I). No mitigation measures have been identified that would reduce the industrial development of the Proposed Project across the Kofa NWR."

The draft EIR/EIS does not adequately address the significant negative impacts to the adjacent wilderness areas in the KOFA. There is a significant negative impact to the visual resources from the

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wilderness, plus there will be noise issues both during and after construction. All of this is inconsistent with wilderness and the opportunity for solitude it provides. B8-17 cont.

Recreation would also be affected in the KOFA as well as along the Harquahala to KOFA segment to the east as well. On page D.5-26, it states:

> "Overall, Proposed Project operation would significantly change the character of recreational resources along the Harquahala to Kofa NWR segment or diminish their recreational value, resulting in a significant and unavoidable impact (Class I)."

There would also be significant and unmitigable impacts to the recreation and wilderness in the Harquahala Mountains (page D.5-20, D.5-26). On page D.5-26 of the draft EIR/EIS, it states:

> "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA."

An alternative site to the Harquahala Mountains for the telecommunications site should have been considered.

Cultural Resources
As indicated on page D.7-40 of the draft EIR/EIS, the negative impacts to the Smithsonian Institution Observatory in the Harquahala Mountains, where the telecommunications equipment site would be constructed would also be "significant and unavoidable (Class I)." Because the other cultural resources along the route are not that well documented, it is very likely that there are significant and unmitigable impacts to these as well. B8-18

Noise
The corona noise would be a significant and unmitigable impact on the KOFA. As the draft EIR/EIS points out, there will be a two decibel increase in the noise on the KOFA. A one decibel increase is noticeable by the average person, so clearly this increase in noise on the KOFA will be beyond noticeable. B8-19

The draft EIR/EIS does not adequately examine the negative impacts to wildlife: We are concerned that the biological reconnaissance surveys were conducted in the Arizona portion of the proposed DPV2 route on October 6, 7, 12, 13, 25, and 27. There were no surveys conducted during different times of the year when certain types of birds, desert tortoises, and other animals might be more active and more readily observed. B8-20

Desert Tortoises
The Sonoran Desert population of desert tortoises *(Gopherus agassizii)* is not listed as threatened or endangered, but there is every indication that its numbers are dwindling. Habitat fragmentation, disease, exotic plant species and the associated fires, illegal collection, and off-road vehicles, among other issues, threaten these animals. Because of the declining populations, it is critical that we protect these animals in places like wildlife refuges including the KOFA National Wildlife Refuge. B8-21

According to the National Park Service:

> "There has been a substantial decrease in perennial grasses, shrubs, and native annuals and an increase in exotic annuals such as red brome (*Bromus rubens*). These vegetational changes can be

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detrimental to desert tortoises for a number of reasons. First, they require perennial shrubs for cover from the intense solar radiation in the desert. Second, perennial grasses are important secondary food sources for the desert tortoise in many areas. Third, recurrent fires and competition from exotic annuals may reduce the abundance and diversity of native forbs which are the major food source of the desert tortoise. There is some controversy over the role that introduced exotics play in the desert tortoise diet suggesting that further research is needed."[15]

B8-21 cont.

Habitat fragmentation is also a major factor in tortoise decline. Each tortoise requires about 1.5 square miles of habitat over its lifetime and male tortoises may require even more. Tortoise habitat area needs are greater in drought years, which Arizona has been experiencing for the past several years. This Proposed Project is likely to further fragment habitat for the tortoises, especially within the KOFA National Wildlife Refuge, a place that is set aside for wildlife.

Desert tortoises are primarily active during and around rainfall events, including Arizona's summer monsoons. They lay their eggs in June and July.[16] Guidelines indicate that surveys for the tortoises should be done during those periods. According to the Arizona Game and Fish Department:

"Surveys will be most productive during tortoise activity periods, primarily during the summer monsoon season but also in the spring."[17]

The biological reconnaissance surveys were not done during the primary activity periods for these animals, so it is very likely that there numbers and the impact of this project on them have been underestimated in the draft EIR/EIS.

Desert Bighorn Sheep

The draft EIR/EIS fails to adequately evaluate the negative impacts of the Proposed Project route on desert bighorn sheep (*Ovis Canadensis nelsoni*). While the overall population of desert bighorn sheep has increased since 1960, there numbers are still relatively small. Desert bighorn sheep are listed as a subspecies of concern in North America[18] and should have had some additional consideration in the document. We saw no discussion or analysis regarding the impacts DPV2 will have on the movement and migration of desert bighorn sheep. We know that these animals travel between mountain ranges and that roads fragment their habitat and create barriers for movement. Will a second line and the associated infrastructure limit the movement of these animals?

B8-22

The draft EIR/EIS fails to adequately examine the cumulative impacts of the Proposed Project: The cumulate impacts analysis focuses almost entirely on future projects and fails to adequately address the impacts of past projects, including Devers 1. The draft EIR/EIS appears to downplay the impacts of the first line, especially in conjunction with this additional line. Per 40 CFR § 1508.7, a cumulative impact is the impact on the environment which results from incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions."

B8-23

Mitigation:

The draft EIR/EIS fails to adequately analyze the proposed mitigation measures for viability. The mitigation measures are listed or referenced, but no where is there any information backing up their viability or effectiveness. Many of the measures were culled from the Devers 1 line mitigation, but we see no analysis of the effectiveness of these previous mitigation measures. The proposal to move desert tortoises is one example. Moving tortoises from one area to another can help spread disease, plus places

B8-24

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Comment Set B8, cont.
Sierra Club, Grand Canyon Chapter

significant stress on the animals. Desert tortoises lose water at a very slow rate and can survive for up to a year without access to free water. When tortoises are under stress, however, they expel the contents of their bladders. This stress can lead to dehydration and eventual death.

B8-24 cont.

While in captivity, diseases can be transmitted between tortoises. Tortoises released back into the wild risk spreading disease through the wild population. The Arizona Game and Fish Department indicate that tortoises should be moved within 48 hours in advance of the habitat disturbance, so they don't return to the burrow in the disturbed area and that they can only be moved up to two miles. Furthermore, they advise that tortoises that will be removed during a period of longer than one week will be placed in desert tortoise adoption programs.[19] It is highly unlikely that the construction in an area would be less than one week. The mitigation for tortoises is not viable.

Tortoises tend to use the same burrows over and over and "exhibit strong site tenacity."[20] Furthermore, translocating reptiles in general results in high mortality and as they tend not to do well in unfamiliar territory.[21] Some studies indicate that translocation of reptiles like rattlesnakes and Gila monsters also result in high mortality rates.

Moving other species can also have high mortality rates including for both plants and animals. Again, the discussion and analysis of this in the draft EIR/EIS is inadequate.

B8-25

No mitigation was proposed for the increase in air emissions or the increase in water use related to the operation of the merchant power plants and the likely additional power plants.

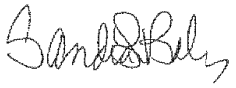
Summary:

The Proposed Project will have significant and unmitigable impacts to many of the public lands it crosses, especially the KOFA National Wildlife Refuge. It is clear that the DPV2 is incompatible with the Refuge and its mission. The Proposed Project is unlikely to provide any real benefits to Arizona and could very likely result in increased electricity rates, not to mention an increase in air emissions and an increased use of groundwater. This draft EIR/EIS fails to adequately analyze some of the significant negative impacts, including those on groundwater quantities. It also does not adequately analyze the alternatives including the No Action/No Project Alternative. It is clear that the only environmentally friendly alternative and the Environmentally Preferable Alternative is the No Action/No Project Alternative. It is also the only alternative which adequately protects the wildlife refuge and is consistent with its mission. The costs to the environment of the DPV2 are just too great in comparison with any benefits. We urge that the Proposed Project be rejected and the No Action Alternative be selected.

B8-26

Thank you for considering our comments. Please keep us informed on this project.

Sincerely,



Sandy Bahr
Conservation Outreach Director
Sierra Club – Grand Canyon Chapter

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Comment Set B8, cont.
Sierra Club, Grand Canyon Chapter

[1] Arizona Public Service Company, letter to Arizona Corporation Commissioner Kris Mayes, June 2, 2006
[2]TEN STEPS TO SUCCESS: How California can cut Global Warming Pollution by 25% by 2020, *Natural Resources Defense Council* www.nrdc.org ♦ *Environmental Defense* www.environmentaldefense.org, pages 1-2.
[3]Ibid.
[4]Daniel M. Kammen, Kamal Kapadia, Matthias Fripp (2004). "Putting Renewables to Work: How Many Jobs Can the Clean Energy Industry Generate?" A Report of the Renewable and Appropriate Energy Laboratory, University of California, Berkeley. http://ist-socrates.berkeley.edu/~rael/renewables.jobs.pdf
[5] U.S. Department of Energy, www.eia.doe.gov/emeu/cabs/usa.html
[6] U.S. American Wind Energy Association, http://www.awea.org/pubs/factsheets/Cost2001.PDF
[7]Archer, Cristina L. and Mark Z. Jacobson, *Evaluation of global wind power*, Journal of Geophysical Research, Vol. 110.
[8] Palo Verde could expand: 2 new reactors are considered as needs soar, *Arizona Daily Star*, May 19, 2006
[9]America's National Wildlife Refuge System, www.fws.gov/Refuges/
[10]*Kofa National Wildlife Refuge & Wilderness and New Water Mountains Wilderness Interagency Management Plan*, October 1996 http://www.blm.gov/az/env_docs/library/wilderness_plans/Kofa-NewWaterMtsWildPlan2.pdf
[11]Palo Verde could expand: 2 new reactors are considered as needs soar, *Arizona Daily Star*, May 19, 2006
[12]Cohen, Steven, *Just Say No: Nuclear power is complicated, dangerous, and definitely not the answer*, August 8, 2006.
[13]*The Last Straw: Water Use at Fossil Fuel Power Plants in the Arid West*, Western Resource Advocates, April 2003, available on line at www.westernresources.org/media/pdf/WaterBklet-Final.pdf
[14]*Energy Facility Licensing Process, Water Supply Information*, California Energy Commission, December 2000, page 1.
[15]National Park Service, on line http://www.nps.gov/moja/planning/tort.htm
[16]*Desert Tortoise Management*, Arizona Game and Fish Department, on line at http://www.gf.state.az.us/w_c/desert_tortoise.shtml
[17]*Desert Tortoise Survey Guidelines for Environmental Consultants*, Arizona Game and Fish Department, March 1999, http://www.gf.state.az.us/pdfs/w_c/tortoise/Survey%20Guidelines%20for%20Consultants.pdf
[18]McCutchen, Henry E., *Desert Bighorn Sheep*, National Biological Service, 1995, on line at *http://biology.usgs.gov/s+t/noframe/r039.htm*
[19]*Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects*, Arizona Game and Fish Department, January 17,1997, available on line at http://www.azgfd.gov/pdfs/w_c/tortoise/Tortoise%20handling%20guidelines.pdf
[20]Ibid.
[21]Tortoise Tracks, http://www.tortoise-tracks.org/newsletter/tt25-2.pdf

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Comment Set B8, cont.
Sierra Club, Grand Canyon Chapter

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August 25, 2006

CPUC/BLM
c/o Aspen Environmental Group
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San Francisco, CA 94104-3002
Sent via email dpv2@aspeneg.com and facsimile (800) 886-1888

Dear John Kalish and Billie Blanchard:

I am writing this letter on the *Draft Environmental Impact Report/Environmental Impact Statement for the Proposed Devers-Palo Verde No 2 Transmission Line Project* (EIR/EIS) on behalf of the Sierra Club's Grand Canyon Chapter and our more than 13,000 members in Arizona. While we understand the comment deadline is passed, we would like to submit this letter to correct a misstatement in our earlier comments. On page 5 of our comments, dated August 11, 2006, under "**Environmental Impacts: *The Proposed Project is incompatible with the KOFA National Wildlife Refuge,"*** we stated, "While there was a clause in the Desert Wilderness Act that excluded a right-of-way for the second line to cross the KOFA Wilderness, the Sierra Club has always considered this incompatible with the wilderness and with the refuge." This was not technically accurate. It should have read, "While the wilderness boundary was drawn around the right-of-way and was large enough to accommodate a second line, the Sierra Club has always considered this incompatible with the wilderness and with the refuge." There was no clause in the Arizona Desert Wilderness Act.

We apologize for any confusion on this matter. Please take this into consideration when reviewing our comments.

Thank you.

Sincerely,

Sandy Bahr
Conservation Outreach Director
Sierra Club – Grand Canyon Chapter

Responses to Comment Set B8
Sierra Club, Grand Canyon Chapter

B8-1 The commenter's support for the No Project/Action Alternative has been noted. Please refer to Response B1-2.

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

B8-2 Please refer to General Responses GR-2 and GR-3 for a discussion of Arizona's benefits from the project and why SCE states that the DPV2 project is needed. Also refer to Response B1-5.

B8-3 Please refer to General Response GR-3 for a discussion of project need. Also refer to Response B1-6 for a discussion of conservation, efficiency, and renewables.

B8-4 Please refer to Response B1-6 for a discussion of renewables and B3-5 for a discussion of the No Project/Action scenario. Section 4.5.1 in Appendix 1 of the Draft EIR/EIS (see also Sections C.5.5.1 and ES.2.3.4) discusses the New Conventional Generation Alternative. The specific configuration of new generation would vary depending on a number of factors that cannot be defined with certainty (e.g., need, market forces), but the new facilities would likely be installed in a location with convenient and economical access to fuel supplies, existing transmission facilities, major existing substations, and load centers. Construction and operation of new generation facilities would be subject to separate permitting processes that would need to be completed in advance of construction. In the Draft EIR/EIS it was assumed that SCE would need to take an integrated approach to procure 1,200 MW of power for its customers before 2009 under this alternative. For the New Conventional Generation Alternative, it is assumed that the most likely method of providing new power generation would be through the construction of combined cycle natural gas-fired turbine power plants. This, however, does not preclude the potential use of alternative energy technologies such as renewable resources. However, the New Conventional Generation Alternative would not satisfy the following project objectives: adding transmission import capability into California and providing access to low cost energy, providing additional transmission infrastructure, and improving the reliability and flexibility of the region's transmission system. In addition, the long-term operational environmental impacts of power plants (i.e., air emissions, water usage) can be balanced against the impacts of long transmission lines. Therefore, it was eliminated from full consideration in the EIR/EIS.

This is an environmental document and it does not make a decision on need. The CPUC and BLM, in making final decisions on the DPV2 Project, will consider the need for the project in their decisionmaking.

Regarding the announced closure of the Mohave Generating Station (GS), electricity from Mohave GS and Palo Verde Nuclear Generating Station (PVNGS) both come through the West of River paths. Electricity from Mohave GS uses the northern half of the path and the PVNGS power uses the southern. As a result, the closure of Mohave might leave one line underutilized (from the Las Vegas area to the Los Angeles area) the power would still need to get from Phoenix (i.e., PVNGS) to Las Vegas (i.e., Mohave) to Los Angeles and substantial upgrades between Palo Verde and Mohave would be needed.

B8-5 Please refer to Response B1-6 for a discussion of conservation, efficiency, and renewables and B6-5 for a discussion of the range of alternatives considered.

B8-6 The DPV2 project would not take power only from the Palo Verde Nuclear Generating Station, but from that generator and the many other gas-fired generators in the Palo Verde area (see EIR/EIS Table A-3). Also, it appears that while APS may be considering expansion of PVNGS to add new generating units, no decision to do this has been made, and a lengthy regulatory process would be required.[1] Please refer to General Response GR-3. See also Response B1-6 for a discussion of renewables, including solar technologies.

B8-7 Please refer to Response B3-5 for a discussion of the No Project/Action scenario. In addition, the No Project/No Action Alternative is presented in Section C.6, as required under both CEQA and NEPA, and is analyzed by each issue area section. This alternative is also presented in Executive Summary Section ES.4 and is compared to the Environmentally Superior/Preferred Alternative in Section E.3 and Executive Summary Section ES.5. Because the No Project/No Action Alternative would likely require construction of transmission lines with impacts similar to those described for the Proposed Project, as well as impacts of generation sources, it was found not to be superior to the Proposed Project (Environmentally Superior/Preferred Alternative).

B8-8 An underground alternative for the entire route or for shorter segments is analyzed in Section 4.4.3 of Appendix 1 of the EIR/EIS (see also Appendix 1, Section C.5.4.2). Please refer also to Response A18-70. The Underground Alternative would meet the project objectives and three of the four technologies would be feasible. If a short underground segment were considered (e.g., to avoid a specific high impact area), these technologies may not be cost prohibitive to construct. However, all underground construction of transmission lines requires a continuous trench in which to install duct banks that would carry the electrical cables. This amount of trenching would create significant impacts to soils/erosion, cultural resources, biological resources as well as a longer construction time and the need for large transition structures. Underground 500 kV lines also require cooling for the conductors, which would be either a circulating fluid or a gas. Both technologies require numerous pumping stations and underground vaults, creating additional disturbance. In high value habitat like the Kofa NWR, the extent of this ground disturbance would result in significant impacts to vegetation and to wildlife, as well as greater visual impacts from the resulting land scarring.

Operational impacts would also be greater associated with maintenance and access to the buried lines, and repair times would be much longer. With the exception of permanent visual resource impacts that would be eliminated, underground construction would cause much greater impacts to most issue areas than the Proposed Project. Therefore, given the potential for increased significant environmental impacts associated with the construction, operation and maintenance of an underground 500 kV transmission line, the unproven reliability for long-distance underground 500 kV transmission lines, the reliability concerns associated with the steep slopes, and the high cost of these technologies, undergrounding the transmission line was eliminated from full analysis in the EIR/EIS during the alternative screening phase.

The comment also suggests that moving the existing 500 kV line underground be considered. The specific technical concerns related to this action are addressed in the previous paragraphs and the environmental impacts associated with the removal of the existing lines and construc-

[1] http://www.shundahai.org/5-18-06AZRepub_APS_Weighs_Expanding_Palo_Verde_by_2_Units.htm

tion of a second new 500 kV would be far greater than the impacts of the Proposed Project. In addition, the existing DPV1 transmission line is considered part of the environmental baseline, and as such, changes to that line could not be imposed in this EIR/EIS addressing only the proposed DPV2 project. Furthermore, the NEPA analysis is properly limited to impacts associated with the proposed action and is not required to analyze the impacts of changes to existing facilities that are not part of the proposed action. Therefore, impacts of the Proposed Project do not include the effects of activities already occurring or facilities already in existence, such as the DPV1 line. In the case of the DPV2 EIR/EIS, the analysis of the effects of the Proposed Project is properly limited to impacts associated with the installation of the new 500 kV line.

Appropriate alternatives must be limited to those that could avoid or lessen the effects of the DPV2 500 kV transmission line. NEPA does not permit the lead agency to try to "fix" or improve the existing environmental setting unrelated to the project — here, the existing DPV1 500 kV line — using a proposed change to the environment as a hook. Accordingly, undergrounding the DPV1 line, which is existing and independent of the Proposed Project, in a new alignment in conjunction with DPV2 is not permissible under NEPA.

As a related point, NEPA specifies that in order for a mitigation measure (and by inference, an alternative) to be feasible, it must meet relevant constitutional standards. Such standards include a requirement that there be an essential connection or relationship between an alternative and a legitimate lead agency interest dealing with the Proposed Project. Again, since the impacts of the Proposed Project stem solely from construction of a new DPV2 500 kV line, and not from the existing DPV1 500 kV line, relocation of the existing 500 kV line to a wholly new overhead or underground alignment or removal of the 500 kV line cannot reasonably be considered in the NEPA document.

B8-9 Please refer to Response B1-2.

B8-10 Please refer to Response B1-2 and B3-18.

B8-11 Please refer to Response B1-3 and B1-4.

B8-12 As stated in the Draft EIR/EIS, both the proposed *and* north of Kofa NWR alternative routes would create significant and unmitigable impacts to visual and recreational resources in the area in and around Kofa NWR. The commenter is correct that Section D.3.6.2 states that Impact V-7 [Increased visual contrast, view blockage, and skylining when viewed from Key Viewpoint 4 on Crystal Hill Road in Kofa NWR (VS-VC)] would be significant and unmitigable (Class I), and Section D.5.6.2 states that Impact WR-2 (Operation would change the character of a recreation or wilderness area, diminishing its recreational value) in Kofa NWR would be significant and unmitigable (Class I) for the Proposed Project.

Appendix 2 of the Draft EIR/EIS provides a preliminary or screening evaluation of federal, State, and local government policies that are applicable to the Proposed Project and alternatives. This appendix serves as a tool for focusing the technical sections of the EIR/EIS on relevant policies, and only those policies that warrant further consideration are addressed in the individual issue area sections (see Introduction and Purpose, page Ap.2-1). A summary of the Kofa National Wildlife Refuge & Wilderness and New Water Mountains Wilderness Interagency Management Plan and Environmental Assessment is included in Appendix 2, Section 2.4.5. As described in Section 2.4.5 (page Ap.2-16), this Plan does not provide specific policies for the development of utility corridors. Therefore, the development of

utility corridors would not trigger a policy inconsistency related to Wilderness and Recreation. However, the Plan includes a measure that pertains to visual resources, which is applicable to the construction and operation of the Proposed Project. This measure was carried forward for further analysis in Section D.3 (Visual Resources). See Table D.3-6 for a discussion of the applicable measure from the Kofa National Wildlife Refuge & Wilderness and New Water Mountains Wilderness Interagency Management Plan.

B8-13 Air quality impacts for the Devers-Harquahala 500 kV transmission line are addressed in D.11.4 and specifically the Maricopa County Air Quality Department and the Air Quality Division of Arizona Department of Environmental Quality jurisdictional impacts are discussed in Section D.11.4.1 and Section D.11.4.2, respectively.

Please refer to Response B8-4 for a discussion of the New Conventional Generation Alternative, which could include coal or nuclear power. See also Response C13-3 regarding nuclear power in California.

B8-14 Increased use of water or air emissions for operation of power plants in Arizona would be independent of the Proposed Project, because the DPV2 project is proposed to utilize existing, and fully permitted generation sources. Because the project would purchase power from existing sources, increased use of water for operation or air emissions is not expected to occur as a result of the Proposed Project.

B8-15 In general, consolidating transmission lines within common utility corridors, as proposed with DPV2 adjacent to DPV1, is desirable because it minimizes land disturbance, barriers to wildlife movement, and additional visual impacts that typically result from multiple transmission line corridors. However, impacts related to the line are addressed in Sections D.2 through D.14 and are as stated by the commenter regarding cumulative impacts.

B8-16 The commenter's statement about visual resources is as it is stated in the Draft EIR/EIS. Please refer to Response B5-6 for a discussion of the Harquahala Mountains.

B8-17 The visual, recreation, noise impacts in Kofa NWR, along the Harquahala to Kofa NWR segment, and in the Harquahala Mountains written by the commenter correctly state the conclusions in the Draft EIR/EIS. Please refer to response B5-6.

B8-18 Please refer to Response B5-6 for a discussion of the Harquahala Mountains. Cultural surveys were performed along the entire route and the results are included in the environmental setting in Sections D.7.2 (Devers-Harquahala) and D.7.3 (West of Devers). Due to laws designed to protect the resources, the exact locations of the resources are not disclosed in this EIR/EIS; only registered archaeologists have access to this information.

B8-19 As discussed in Section D.8.6.2, Impact N-2 (Permanent noise levels along the ROW would increase due to corona noise from operation of the transmission lines), operation of the transmission line would create increased noise (up to 65.7 Ldn during wet weather and heavy line loads) at the edge of the ROW. Although there are no ambient noise policies that apply directly to the wildlife refuge, the U.S. EPA generally sets 55 Ldn as a maximum target level for sensitive outdoor areas (see Table D.8-9). The existing conditions in the immediate vicinity of the line exceed this level, and the commenter is correct that the project would exacerbate the effect during the occasional wet weather and heavy line load conditions. The Proposed Project would not cause any new violation of local noise standards because

while the U.S. EPA-recommended level of 55 Ldn is an example a protective level, it has not been specifically adopted for the Kofa National Wildlife Refuge. The corona noise from the proposed line would occur in an existing transmission corridor that already creates noise above the U.S. EPA target levels in the existing conditions, and the increased noise would remain in the immediate vicinity of the corridor. The Proposed Project would not cause a substantial (more than five dBA) change compared to existing conditions. As such, corona noise impacts in the Kofa NWR were found to be adverse but less than significant (Class III) in the Draft EIR/EIS.

B8-20 Please see Response B6-3.

B8-21 Desert tortoise or their sign was identified during the surveys conducted as part of this EIR/EIS and were documented in previous studies conducted along the Proposed Project route (see Response B8-20 above). Potential impacts from noxious weeds would be addressed through the implementation of Mitigation Measure B-1a (Prepare and Implement a Habitat Restoration Plan), B-2a (Conduct invasive and noxious weed inventory), and B-2b (Implement control measures for invasive and noxious weeds). Potential impacts to this species have been adequately addressed within the context of this EIR/EIS.

B8-22 There is no indication that a second power line would limit the migration or movement of bighorn sheep in the project area. The proposed route was selected in order to reduce potential impacts to this species by avoiding new disturbance in other areas where this species is known to occur. Please see General Response GR-1 regarding the placement of the proposed transmission line and its potential effects on bighorn sheep.

B8-23 As explained in EIR/EIS Section F (first paragraph), a cumulative effect results from "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." The analysis of the impacts of the proposed DPV2 transmission line first considered the state of the existing environment, which contains the DPV1 line. While the DPV1 line was not specifically listed in the cumulative projects discussion, it was in fact considered in analysis, because its presence clearly affects the existing environment. This fact is clarified with additional text in Section F.2.1:

> An additional cumulative project, not specifically listed in Table F-1 but considered in all analyses in this document, is the existing Devers–Palo Verde No. 1 Transmission Line. As a "past project", this transmission line parallels the proposed DPV2 line for over 180 miles, and would use its access roads for construction. The DPV1 line defines the location for the DPV2 line, and its presence defines the baseline for environmental analysis.

B8-24 Please see Response B3-23 above addressing the use and development of mitigation. Mitigation measures are presented in the EIR/EIS only if the CPUC and BLM believe that they will be effective. Many of these measures have been used successfully in other projects.

The monitoring and relocation of desert tortoises is routinely implemented to avoid loss of this species during construction projects and is an industry practice authorized by the USFWS. Mitigation Measure B-7b specifically identifies the measures utilized to safely handle and relocate tortoise during construction of the proposed Project. These measures include the standard protocols required by the USFWS and CDFG for projects in desert tortoise habitat to avoid injury to the animal, reduce the potential for the spread of disease and to minimize stress on the animal. This includes moving the animal to an adjacent area away from con-

struction, placing the animal in an artificial burrow or holding the animal overnight in a clean card box that is discarded after one use to prevent the spread of disease. Likewise, the animal would not be relocated if the ambient air temperature would result in thermal stress. Further, only qualified biologists with expertise in the handling of desert tortoise will be responsible for conducting surveys or handling these species. Further, in review of the citation quoted by the Sierra Club in this comment (http://www.tortoise-tracks.org/newsletter/tt25-2.pdf), the CPUC and BLM not agree that the mitigation for desert tortoises is not viable.

B8-25 Please refer to Response B8-24 for a discussion of moving species. Please refer to Response B8-14 regarding the potential for increased water usage.

B8-26 The commenter's support for the No Project/No Action Alternative has been noted. Table ES-1 in Section ES.6 presents a summary of significant unmitigable (Class I) impacts for the Proposed Project. See Response B8-1 regarding the benefits to the State of Arizona. Impacts to groundwater are addressed in Sections D.12.6 (Devers-Harquahala) and D.12.7 (West of Devers).

Comment Set B9
Ellison, Schneider & Harris LLP

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August 11, 2006

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Re: Comments of 3M on the Draft EIS/EIR for the Devers-Palo Verde No. 2 Transmission Line Project

Dear Project Managers:

3M Composite Conductor Program ("3M") is pleased to have the opportunity to submit the following comments on the draft Environmental Impact Statement / Environmental Impact Report (EIS/EIR) for the Devers-Palo Verde No. 2 Transmission Line Project. 3M's comments focus on the treatment of the "Composite Conductor Alternative" presented in the draft EIS/EIR.

INTRODUCTION AND SUMMARY

The draft EIS/EIR issued for this project is a joint CEQA/NEPA document. The document followed CEQA standards for reviewing alternatives, as they are stricter than the NEPA requirements and the document must satisfy the standards of both statutes. The draft EIS/EIR correctly explains that, unlike NEPA, the CEQA Guidelines require that "the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a Proposed Project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (P. C-1.)

This correct statement in the draft EIS/EIR parallels the language in the Guidelines for the California Environmental Quality Act (CEQA):

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (14 CCR §15126.6(b).)

Comment Set B9, cont.
Ellison, Schneider & Harris LLP

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Page 2

The Composite Conductor Alternative was eliminated from consideration. 3M believes that the draft EIS/EIR relied on outdated and inaccurate information regarding the Aluminum Conductor Composite Reinforced (ACCR) proposed for use in the Composite Conductor Alternative. 3M also believes that the Composite Conductor Alternative would avoid or substantially lessen any potentially significant effects of the Proposed Project, while satisfying most of the basic project objectives. Therefore, the Composite Conductor Alternative should be retained for final EIS/EIR analysis.

SPECIFIC COMMENTS

B9-1

Description of the ACCR technology, PP. ES-29, C-48, Ap.1-115-116

The draft EIS/EIR states:

> This alternative would include the replacement of existing conductors in the West of Devers 230 kV system with Aluminum Conductor Composite Reinforced (ACCR), or Aluminum Conductor Composite Core (ACCC) wires. Composite conductors have recently been developed and are being tested to provide roughly two to three times the transmission capability (ampacity) of the standard proposed Aluminum Conductor Steel Reinforced (ACSR) conductors * * * Reconductoring under this alternative could involve investment in 3M Brand Aluminum Matrix Composite Conductors or similar ACCC wires from Composite Technology Corp. These products are being tested by some utilities around the nation, and the first commercial installation of the 3M ACCR was initiated late 2004 in Minnesota. (PP. Ap.1-115-116.)

3M respectfully submits that the draft EIS/EIR mischaracterizes the ACCR as not being a proven commercially available technology. To the contrary, ACCR is beyond the testing phase; it is a commercially available product that is installed and operational on a number of critical utility installations. These include installation sites where ACCR has been used to interconnect different types of generation, such as combined cycle generators or hydroelectric dams, to the transmission network, as well as a number of installations with varying environmental and loading levels in which ACCR is the primary path to serve rapidly growing urban areas, including downtown businesses and large commercial airports. Figure 1 lists some of these installations.

Comment Set B9, cont.
Ellison, Schneider & Harris LLP

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Figure 1: Locations of 3M ACCR Installations

Utilities and Sites where 3M ACCR Is Being Used…		Operating Since
Xcel Energy	Minneapolis/St. Paul, Minnesota	2001
Hawaiian Electric Company	Oahu, Hawaii	2002
Western Area Power Administration	Fargo, North Dakota	2002
Bonneville Power Administration	Washington State	2004
National Grid	New York	2004
WAPA	Phoenix, Arizona	2004
Salt River Project	Phoenix, Arizona	2004
Pacific Gas & Electric	Santa Clara, California	2005
San Diego Gas & Electric	San Diego, California	2005
Xcel Energy	Minneapolis/St. Paul, Minnesota	2005
Arizona Public Service	Phoenix, Arizona	2006
Western Area Power Administration	Arizona/California Border	Fall 2006
Alabama Power	Alabama State	Fall 2006

B9-1 cont.

In addition, the ACCR conductor is based on a unique technology and should not be equated to other conductors. The ACCR's strength and durability result from its aluminum oxide (alumina) fibers, which are embedded in the high purity 3M aluminum matrix core wires. The constituent materials are chemically inert with respect to each other and can withstand extreme temperatures without chemical reactions or any appreciable loss in strength. 3M ACCR relies only on aluminum-based materials, making it corrosion-resistant with no added coatings or barriers required. It is also rated at higher operating and emergency temperatures than polymer based conductors.

The draft EIS/EIR should contain this more accurate, up to date information on the state of the ACCR technology in its description of the Composite Conductor Alternative. Additional information can be found at: www.3m.com/ACCR.

B9-2

Cost Comparison: Composite Conductor Alternative, PP. ES-29, C-48-49, Ap.1-115-116

The draft EIS/EIR states: "This alternative would include the replacement of existing conductors in the West of Devers 230 kV system… at somewhat higher but undisclosed costs." (PP. ES-29, C-48, Ap.1-115.) The draft EIS/EIR also states that: "SCE in its response to the comment letter stated that it believes that the 3M ACCR design for the West of Devers upgrades would result in a higher installed cost, higher life cycle cost, and higher transmission line losses than the Proposed Project." (P. Ap.1-116.)

The costs to deploy this advanced technology would likely be less than the costs associated with the Proposed Project, when all the construction costs of building new towers are totaled on the West of Devers upgrades. While 3M's ACCR is cost competitive with conventional solutions, the commercial installations of ACCR have also demonstrated the other benefits associated with the technology, including reduced project complexity, lower construction time, a simpler siting process and lower visual impacts.

Comment Set B9, cont.
Ellison, Schneider & Harris LLP

Further, the draft EIS/EIR's discussion of the potential costs of the ACCR is based on speculation. Such conclusions can only be arrived at after a site-specific and application-specific study of the Composite Conductor Alternative, which has not been conducted in this case. 3M has not participated in a commercial discussion or provided commercial quotations related to the costs of ACCR on West of Devers. 3M is also unaware of any study related to the life cycle cost of ACCR. In fact, based on the various installations in operation thus far, there has been no indication that the maintenance costs of ACCR would be any different than conventional conductors such as the ACSR conductor proposed by SCE. Therefore, the draft EIS/EIR should delete this discussion of potential cost differential as it is based on speculation and not supported by the record.

B9-2 cont.

Furthermore, even if the Composite Conductor Alternative would be more costly than the Proposed Project, CEQA Guidelines require analysis of alternatives that are capable of eliminating or reducing environmental impacts of the Proposed Project, even if these alternatives would be more costly. CEQA clearly provides that an EIR must consider alternatives even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (14 CCR §15126.6(b).) Accordingly, potential cost differential is not a legally valid basis for dismissing the Composite Conductor Alternative under CEQA. The draft EIS/EIR should therefore be revised to correct this error by deleting the referenced discussion.

The draft EIS/EIR also states: "Additionally, tower replacement would likely be necessary in some areas, and costs of this alternative would be notably higher than the proposed West of Devers upgrades, which would diminish the likelihood of achieving the economic objectives of the Proposed Project." (P. Ap.1-116.) However, the draft EIS/EIR offers no evidence that tower replacement would be necessary, and again offers no explanation as to what it relies on for the cost estimate for this Alternative. This statement is not supported by the record and thus should be revised or deleted.

Significantly, the Composite Conductor Alternative could involve reconductoring just the existing steel lattice structures, and could include removal of the older wood structures, avoiding tower replacement while still providing transmission capability. The potential configurations that would avoid or substantially lessen potentially significant impacts of the Proposed Project are discussed below.

Failure to Meet Project Objectives, PP. ES-29, C-48-49, Ap.1-116

B9-3

In discussing the CEQA/NEPA criteria for alternatives such as meeting project objectives, purpose, and need, and the reasons for elimination of the Composite Conductor Alternative, the draft EIS/EIR states:

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> This alternative would utilize the existing single-circuit 230 kV towers, for the conductor conversion. This poses a risk to SCE achieving its system capacity goals for West of Devers because of the age of the existing structures and their outmoded design. Since reconductoring would make use of the existing structures, there would be uncertainty regarding the expected life of the newly reconductored corridor, in particular along portions on aged wood structures. The proposed steel tower double-circuit arrangement would provide a new system that would have a normal life expectancy. The proposed West of Devers upgrades would also provide a uniform capacity to each circuit in the corridor, which provides system stability in the case of an outage of one of the circuits. This would not be achieved under this alternative because of the different types of structures and the variety of conductor sizes across the corridor. An outage would therefore be more likely to overload the remaining circuits. Additionally, tower replacement would likely be necessary in some areas, and costs of this alternative would be notably higher that the proposed West of Devers upgrades, which would diminish the likelihood of achieving the economic objectives of the Proposed Project. Use of the outmoded existing structures under this alternative would leave the West of Devers corridor incapable of meeting the basic project objective of adding 1,200 MW of transmission import capability. (P. Ap.1-116.)

B9-3 cont.

To begin, 3M notes that the Composite Conductor Alternative could involve two potential configurations. First, the three lines on the existing steel lattice structures could be reconductored, and the old wood single-circuit structures removed. This configuration would completely avoid the environmental impacts associated with the construction, operation, and maintenance of the proposed new double-circuit towers. It would also result in positive environmental benefits associated with the removal of the old wood structures. Second, as an alterative configuration, the old wood poles could be replaced with new wood poles of equal size, and the entire four lines could be reconductored. This configuration would leave the visual characteristics of the line unchanged.

With regard to system reliability, the use of ACCR on the existing structures may not significantly alter the line's reliability due to differences in the types of structures. Upgrading the existing circuits using ACCR will provide a large increase in capacity while maintaining the same level of reliability as the current configuration. Another option, not considered in the draft EIR/EIS, is to use ACCR in place of ACSR on the proposed new and upgraded circuits, approximately doubling their capacity while providing the same system reliability as the

Comment Set B9, cont.
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Proposed Project. The draft EIS/EIR should be revised to include a more accurate discussion of these options for maintaining or improving system reliability.

B9-3 cont.

Finally, the concern that the Composite Conductor Alternative would not meet the economic objectives of the project is unfounded. As discussed above, 3M believes that the costs of this Alternative would be lower than the costs associated with the Proposed Project. Furthermore, 3M again notes that the draft EIS/EIR offers no evidence to support the statement that tower replacement would be necessary with this Alternative. The draft EIS/EIR should correct its false conclusions regarding the cost of this Alternative.

Avoiding or Reducing Environmental Effects, PP. Ap.1-116-117

B9-4

The draft EIS/EIR states, "This [Alternative] would eliminate nearly all construction-related disturbances and nuisances and permanent impacts to visual resources related to the new double-circuit steel towers." (P. Ap.1-116.) The draft EIS/EIR then states:

> Because reconductoring the existing towers would not remove the existing single-circuit wood H-frame and lattice steel structures in the Devers-San Bernardino Junction segment, the existing towers would remain. The visual benefit of reducing the number of tower lines in the corridor would not be achieved. Also, these structures are aged and could require slightly more frequent maintenance than the new towers that would be installed under the Proposed Project. (P. Ap.1-117.)

To begin, the "visual benefit of reducing the number of towers" is not one of the basic project objectives and thus does not form the basis for rejections of this Alterative. Moreover, while the Proposed Project removes two sets of single-circuit towers, it replaces them with a double-circuit tower. The double-circuit steel lattice structures are significantly different in height and size than the single-circuit towers they will replace, resulting in potentially significant impacts that could be avoided by the Alternative. The visual impact of these new structures, particularly as the lines run near the top of ridgelines, is not recognized in the draft EIS/EIR. These impacts should be identified, and mitigation measures, if feasible, proposed.

The other environmental issue discussed for this Alternative is the use of existing structures that could result in slightly more frequent maintenance than the Proposed Project's new towers. In general, periodic maintenance may not produce a large environmental impact. If the Proposed Project's new towers did require less frequent maintenance, another consideration is that the larger steel lattice structures proposed may require larger maintenance equipment, resulting in a larger environmental impact. In other words, it may be that the impact of the maintenance on the Proposed Project's new towers could be greater compared to that required

Comment Set B9, cont.
Ellison, Schneider & Harris LLP

for smaller structures, like those retained in the Composite Conductor Alternative, despite any potential differences in frequency.

B9-4 cont.

The draft EIS/EIR correctly states that the Composite Conductor Alternative would avoid or minimize the adverse environmental impacts of the Proposed Project in the West of Devers segment, like the construction and visual impacts associated with the new double-circuit steel towers. Nevertheless, the draft EIS/EIR improperly concludes that the Composite Conductor Alternative should be eliminated. CEQA and NEPA require more analysis, including the consideration of alternatives capable of eliminating or reducing significant environmental effects, even if they impede to some degree the attainment of project objectives. As shown in these comments, the Composite Conductor Alternative reduces significant environmental effects while meeting most of the basic project objectives.

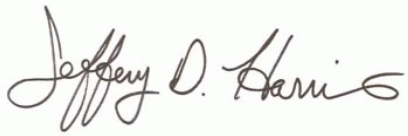
CONCLUSION

B9-5

For the reasons discussed herein, 3M respectfully submits that the draft EIS/EIR should retain the Composite Conductor Alternative for full analysis. The Composite Conductor Alternative is within the "range of potential alternatives to the proposed project * * * that could feasibly accomplish *most* of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." (14 CCR §15126.6(c); emphasis added.) As such, the draft EIS/EIR must be revised as discussed above and include full consideration of this Alternative.

Thank you for the opportunity to provide these comments on the draft EIS/EIR. We look forward to reviewing the revised document.

Sincerely,



Ellison, Schneider & Harris L.L.P
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Andrew B. Brown
Attorneys for 3M Composite Conductor Program

Responses to Comment Set B9
Ellison, Schneider & Harris LLP

B9-1 The comment contends that the Draft EIR/EIS (Section C.5.3.2) mischaracterizes the viability of 3M's ACCR. The comment shows that today there are 13 installations of 3M's ACCR nationwide, but six of these have only become operational during the time of this environmental analysis (2005 to 2006). The seven earlier installations have an average in-service date of 2003. Considering the 50-year anticipated service life of the Proposed Project, the relative longevity of existing ACCR installations is clearly short.

The description of the Composite Conductor Alternative in Section C.5.3.2 includes 3M's ACCR along with composite conductors offered by other manufacturers because, despite the technological differences, installing any composite conductor would have similar environmental consequences as installing 3M's ACCR. The Final EIR/EIS clarifies the availability of ACCR.

B9-2 The comment addresses the potential costs to deploy 3M's ACCR in comparison with the costs of the proposed West of Devers upgrades. However, because no cost estimate is provided, SCE's opinion regarding higher life cycle costs and transmission losses remains germane. The economic advantages or disadvantages of the Composite Conductor Alternative may be considered by decision-makers in the General Proceeding, and costs are relevant to whether SCE would be able to achieve project objectives. However, as noted by the comment, the cost differential is not a basis for dismissing an alternative. The Final EIR/EIS also includes the following revisions to Section 4.3.3 in Appendix 1 to clarify that cost is not the basis for eliminating this alternative:

> Additionally, tower replacement would likely be necessary in some areas~~, and costs of this alternative would be notably higher than the proposed West of Devers upgrades, which would diminish the likelihood of achieving the economic objectives of the Proposed Project~~…
>
> ***ELIMINATED.*** This alternative may be feasible, but it would not meet the project objectives because of its dependence on aged structures. Use of the outmoded existing structures under this alternative would leave the West of Devers corridor incapable of meeting the basic project objective of adding 1,200 MW of transmission import capability. ~~Higher costs would make the economic objectives of the Proposed Project less likely to be achieved.~~ Therefore, this alternative has been eliminated from analysis in this EIR/EIS.

In addition, Section C.5.3.2 (Composite Conductor Alternative) has also been revised as follows:

> Additionally, tower replacement would likely be necessary in some areas~~, and costs of this alternative would be notably higher than the proposed West of Devers upgrades, which would diminish the likelihood of achieving the economic objectives of the Proposed Project~~.

Using older, existing towers and the life expectancy of reconductored towers in this corridor is a major concern of SCE made in responses to Data Requests (October 26, 2005). Replacing the wood structures would be necessary to achieve equal capacities across the new circuits, which SCE claims is key for achieving the proposed 1,200 MW increase in import capability.

B9-3 The comment provides example configurations that would use the 3M ACCR. None of these were carried forward for detailed analysis in the EIR/EIS for the following reasons:

(1) Reconductoring the three existing steel lattice structures with ACCR and removing the old wood single-circuit would eliminate one of the Devers–San Bernardino circuits. Adding a new wood pole circuit to maintain the appearance of the corridor in its present state and allow reconductoring of all four circuits but would not be likely to notably reduce environmental impacts of the Proposed Project, and this could leave the new circuits with unequal capacities.

(2) Using ACCR in place of ACSR on the proposed re-built towers and new circuits would lead to environmental impacts essentially identical to those of the Proposed Project. The description of the Composite Conductor Alternative in Section C.5.3.2 of the Final EIR/EIS clarifies that the purpose of the alternative is to use the existing structures.

B9-4 The aesthetic effects of this alternative compared to the Proposed Project are not a consideration in the elimination of this alternative. The visual impacts of the proposed double-circuit steel lattice structures including a comparison to the No Project Alternative, which would retain the existing structures, are disclosed in Section D.3 of the EIR/EIS. Rather than rely on a comparison of aesthetic effects, the basis for eliminating the Composite Conductor Alternative established in Section 4.3.3 of the Alternatives Screening Report (Draft EIR/EIS Appendix 1) is the inability of the alternative to reliably add 1,200 MW of transmission import capability on the existing structures.

B9-5 CEQA allows the lead agency discretion in considering alternatives to a project. The Alternatives Screening Report (EIR/EIS Appendix 1) shows that the Composite Conductor Alternative would not be capable of adding 1,200 MW of transmission import capability. The alternative was then eliminated because it would not achieve this *key* project objective.

Comment Set B10
Arizona Wilderness Coalition

Arizona Wilderness Coalition
Working Together to Protect Arizona's Wild Lands and Waters
PO Box 2741 Prescott, AZ 86302 - (928) 717-6076 - www.azwild.org

August 11th , 2006

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
dpv2@aspeneg.com

RE: Comments for proposed Devers-Palo Verde No. 2 Transmission Line Project

Dear Comment Analysis Team:

Thank you for this opportunity to offer comments on the proposed Devers-Palo Verde No. 2 Transmission Line Project. The Arizona Wilderness Coalition's (AWC) mission is to permanently protect and restore Wilderness and other wild lands and waters in Arizona for the enjoyment of all citizens and to ensure that Arizona's native plants and animals have a lasting home in wild nature. The AWC has a membership of about 1,600 people.

We have reviewed the comments submitted by the Yuma Audubon Society and fully support all of their points for not proceeding with this project. B10-1

In general the Arizona Wilderness Coalition is opposed to new projects that impact our natural desert landscape. The existence of the Devers-Palo Verde No. 1 line already has significant impacts to the native flora and fauna and recreational resources in AZ. The construction of more lines will surely further impact these resources and we hope that an alternative that does not construct more power lines can be found. That is why we believe the no project/no action alternative is the most environmentally, economic, and socially acceptable alternative.

This alternative is clearly the Environmentally Preferred Alternative. The costs of this project to the environment are too great in comparison with any benefits, few, if any of which will be realized by the people and the lands in Arizona. In fact, the draft EIR/EIS makes it all too clear that Arizona will suffer significant environmental degradation and very probably increased electricity rates as a result of this project. California should provide its own power without coming to AZ as we are going to need all the power that Palo Verde can produce in the coming years to meet our growing demands.

A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge as well as the Ranegras Plain and other BLM wilderness quality lands. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the refuge. B10-2

Comment Set B10, cont.
Arizona Wilderness Coalition

Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. (See page ES-38, ES-42). Adding additional industrial features to the landscape is a significant adverse visual change, as the draft EIR/EIS states. The project would change the character of the KOFA and significantly diminish its recreational value as well. B10-2 cont.

Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW. B10-3

Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles. B10-4

The Harquahala Mountains would face significant impacts relative to both recreation and wilderness. According to the draft EIR/EIS (p. D.5-26), "Implementation of the telecommunications facility resulting from operation of the Proposed Project would permanently diminish the character of Harquahala Peak and the Harquahala Mountains WA." An alternative to this proposed telecommunications site should have been considered. Again, no action is the only alternative that will keep this area from being degraded. B10-5

The primary route is not an environmentally friendly route, but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments. That is just another reason to question the need for this project and to select the no action alternative. B10-6

This project has been in a near "finalized" form for over 15 years and California seems to be getting along just fine without the new power line. Besides, Phoenix is the fifth largest city in the nation and one of the fastest growing areas in the nation. It is likely in the near future that the metro area will consume all of the power generated in the area and therefore will not have any additional electrical energy to transport out of the area. Why then, is this line needed to send power to California? B10-7

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

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

Thank you for considering our comments.

Comment Set B10, cont.
Arizona Wilderness Coalition

Sincerely,

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AZ Wilderness Coalition
Regional Director
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928-717-6076
jwilliams@azwild.org

Responses to Comment Set B10
Arizona Wilderness Coalition

B10-1 The commenter's support for the comments of the Yuma Audubon Society (Comment Set B3) and for the No Project/No Action Alternative has been noted. Please refer to Response B1-2 and General Response GR-2 regarding costs and benefits of the project in Arizona.

Arizona electricity rates are set by the Arizona Corporation Commission. The comment regarding increased electricity rates in Arizona is not within the scope of the environmental review under NEPA or CEQA.

B10-2 Please refer to Response B1-2 and General Response GR-1 for a discussion of Kofa NWR. A discussion of impacts to wilderness lands is included in Section D.5.6 and D.5.7 in the Draft EIR/EIS. However, it is noted that the DPV2 Project is not proposed to be installed on lands with formal wilderness designations. The biological resources discussion of the Ranegras Plain is included in Section D.2.1.1 (Regional Setting) and impacts would be addressed in Section D.2.6.1 (Impacts of Transmission Line Construction) in the Harquahala to Kofa NWR segment of the Proposed Project. Significant visual and recreation impacts within Kofa NWR are discussed in Sections D.3.6.2 and D.5.6.2 of the Draft EIR/EIS, respectively, and are correct as the commenter notes. See also Response B3-20 regarding impacts to recreational resources.

B10-3 Please refer to Response B1-3.

B10-4 Please refer to Response B1-4.

B10-5 Please refer to Response B5-6.

B10-6 Please refer to Response B1-4.

B10-7 Please refer to Response B1-5, B1-6, and B1-7. The commenter's preference for the No Project/No Action Alternative has been noted.