

Comment Set C1
E. S. Robison

Devers–Palo Verde No. 2 Transmission Line Project

From: ELLIBIGBELLY@wmconnect.com
Sent: Monday, May 15, 2006 7:45 PM
To: Dpv2@aspenerg.com
Subject: devers palo verde #2 transmission line project

Please, please, please do not continue with the proposed Devers Palo Verde project. Please do not destroy any more of the Arizona refuge's beautiful landscaping. Please do not put and more power line towers up. Use an alternate route along the freeway if you must, but PLEASE do not go thru Kofa National Wildlife Refuge. Please find an alternate route for your project. NO MORE TOWERS ON THE REFUGE. PLEASE FIND ANOTHER WAY! Thank You.

C1-1

E. S. Robison

Responses to Comment Set C1 E. S. Robison

- C1-1 The commenter’s objection to the Proposed Project and the route through Kofa NWR is noted. Please refer to General Response GR-1 for a discussion of the alternative routes around Kofa NWR and why the proposed route was found to be environmentally preferable in this area.

Comment Set C2
Nancy Newkirk

Devers–Palo Verde No. 2 Transmission Line Project

From: nancy newkirk [greeniefrost@yahoo.com]
Sent: Monday, June 05, 2006 10:49 AM
To: dpv2@aspenerg.com
Subject: Power Line Comments

Dear People:

Following are my concerns about the proposed new power line:

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

C2-1

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

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

C2-2

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

Comment Set C2, cont.
Nancy Newkirk

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

C2-3

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

It seems that no clear answers to these concerns have been forthcoming. For instance, have any non-development alternatives been considered? Can California institute energy conservation programs equivalent to the amount of energy this line will carry? Can environmentally-friendly, renewable, and sustainable energy sources be implemented i.e., solar, wind, or biomass, so this line is not necessary? In Washington state in years past, a considerable amount of energy has been “found” by using conservation measures. Everyone was very pleased, and the cost of the “new” energy was considerably lower than any other type of energy to be “found.”

C2-4

Rate-payers of Arizona lose again and again on this deal. We generate the power, we destroy the state's landscape, we destroy our views, we destroy more animal habitat — California gets the power.

C2-5

Please reconsider and drop this plan. Our deserts are stressed enough. And the nuclear plant is under great stress as it is. We are very concerned that there will be a total blackout in summer at some point due to the plant's inability to supply the majority of electrical needs. And, we DO NOT want any enlargement of the plant. The whole city of Phoenix is downwind of Palo Verde and would be severely affected if an accident should happen!

Sincerely,

Nancy Kroening
123 East Calavar Road
Phoenix AZ 85022

Responses to Comment Set C2 Nancy Newkirk

- C2-1 Please refer to Responses B1-2 and B1-3.
- C2-2 Please refer to Response B1-4.
- C2-3 Please refer to Response B1-5.
- C2-4 Please refer to Response B1-6.
- C2-5 Please refer to General Response GR-2 for a discussion of Arizona’s benefits from the Proposed Project. The Proposed Project does not include any enlargement of the Palo Verde Nuclear Generating Station (PVNGS). In addition, the Proposed Project route would terminate at the Harquahala Switchyard, approximately 14 miles northwest of PVNGS.

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

Comment Set C3
Matt Kalina

Devers-Palo Verde No. 2 Transmission Line Project

From: Matt Kalina [mattkalina@yahoo.com]
Sent: Monday, June 05, 2006 7:01 PM
To: dpv2@aspeneq.com
Subject: Re: Protect the KOFA National Wildlife Refuge - Ban Palo Verde 2 power line

CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104
Fax 1 (800) 886-1888
Email dpv2@aspeneq.com

Mark me as against the ill-advised measure in which Southern California Edison has filed an application with the California Public Utilities Commission and with the Arizona Corporation Commission to construct the Devers-Palo Verde No. 2 Transmission Line Project (DPV2), a 500 kV line that will cut across important and sensitive wildlife habitat.

C3-1

Sincerely,

Matt Kalina
8342 E. Weldon Ave.
Scottsdale, AZ 85251
480-429-5850 Home office
mattkalina@yahoo.com

--- Sandy Bahr <sandy.bahr@sierraclub.org> wrote:

> PROTECT THE KOFA NATIONAL WILDLIFE REFUGE
>
> COME TO ONE OF THE IMPORTANT PUBLIC WORKSHOPS
>
>
>
> Southern California Edison has filed an application with the California
> Public Utilities Commission and with the Arizona Corporation Commission to
> construct the Devers-Palo Verde No. 2 Transmission Line Project (DPV2), a
> 500 kV line that will cut across important and sensitive wildlife habitat.
> Please attend one of the workshops listed below, find out more about the
> project, and tell them you think this is an unnecessary and
environmentally
> damaging proposal.
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>
>
> The only Arizona workshops will be held on Tuesday, June 6, 2006.
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> 2:00 pm - 4:00 pm at Harquahala Valley Irrigation District located at 402
S.
> Harquahala Valley Rd, Tonopah, AZ 85354

C3-2

Comment Set C3, cont.

Matt Kalina

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>
>
> 7:00 pm - 8:30 pm at Harquahala Valley Irrigation District located at 402
S.
> Harquahala Valley Rd, Tonopah, AZ 85354
>
>
>
> Directions: Take I-10 East to Exit #81/Salome Road. Turn South across
> interstate. Immediately turn right (West) on Harquahala Valley Road, road
> makes a sharp bend to South in approximately 1/2 mile. Travel
approximately
> 3 miles South to the Irrigation District office on the west side of
> Harquahala Valley Road.
>
>
>
> These workshops are not public hearings, so you will likely not have a
> chance to make formal comments. You can join us in requesting a public
> hearing however. If you cannot make one of the workshops, there will
still
> be an opportunity to comment on the Draft Environmental Impact
Report/Draft
> Environmental Impact Statement. The comment deadline is July 5. Comments
> can be sent to:
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>
>
> CPUC/BLM
>
> c/o Aspen Environmental Group
>
> 235 Montgomery Street, Suite 935
>
> San Francisco, CA 94104
>
> Fax 1 (800) 886-1888
>
> Email dpv2@aspeneg.com
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> BACKGROUND:
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> The primary route for this proposed line would cut through the KOFA
National
> wildlife Refuge. Currently a Devers–Palo Verde line exists. The first
line
> was completed in 1978. This proposal for a second line has been around
for
> a while, but has been controversial since its inception. By 1989 or 1990
the
> second line had progressed to the point of having an Environmental
> Compatibility Analysis performed and deemed acceptable for the project.
The
> project had reached the point where permits were issued by the local
> agencies and were awaiting the signature of then President George H.W.
Bush
> who did not sign before leaving office. All the permit issues died under

C3-2 cont.

Comment Set C3, cont.
Matt Kalina

C3-2 cont.

- > President Clinton.
- >
- >
- >
- > 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. There was a clause in the Desert
- > Wilderness Act that excluded a right-of-way for the second line to cross
- > the
- > KOFA wilderness. That is the primary route proposed for this line.
- >
- >
- >
- > CONCERNS:
- >
- > 1) A second power transmission line would further fragment and
- > reduce the quality and quantity of habitats on the KOFA National Wildlife
- > Refuge. By that standard alone the proposed new 500 KV is incompatible
- > with
- > the mission of the refuge. The Right-of-way (ROW) through KOFA is prime
- > desert big horn sheep and desert tortoise habitat. The line will also
- > obstruct the natural view of the area that is pristine desert landscape.
- >
- >
- >
- > 2) Nearly 400 acres would be affected through the KOFA National
- > Wildlife Refuge, by the measured right-of-way that is 130 feet wide and 24
- > miles long. More than likely, however, additional land will be affected
- > as
- > construction vehicles travel along the first line's ROW and then across to
- > the new ROW or completely out of the limits. This wide corridor, 560 feet
- > wide, (130 + 300 + 130) could eliminate the necessary ground cover or
- > protection needed by some species to traverse this area, making a boundary
- > to limit their domain or an area of prey if they try to cross the ROW.
- >
- >
- >
- > 3) Mitigation of negative impacts to plant resources (i.e.,
- > transplanting cacti) was not successful during construction of the first
- > power line. Major disturbances would occur at each of the 85 tower sites
- > during construction for the pouring of the concrete footings and the
- > equipment necessary to erect the towers and string the electric lines.
- > Additional impacts would include establishment of invasive plant species
- > in
- > the disturbed areas and the increased probability of illegal use of the
- > ROW
- > by off-road vehicles.
- >
- >
- >
- > 4) The primary route is not an environmentally friendly route to
- > plan the ROW but the alternative routes are not good routes either. The
- > proposed routes destroy pristine desert views, cross critical desert
- > habitat, go through populated areas, and would destroy desert
- > environments.
- > That is just another reason to question the need for this project.
- >
- >
- >
- > 5) This project has been in a near "finalized" form for over 15
- > years and California seems to be getting along just fine without the new

Comment Set C3, cont.
Matt Kalina

> 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?

>
>

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

>
>

> WE NEED ANSWERS!

>

> Have any non-development alternatives been considered? Can California
> institute energy conservation programs equivalent to the amount of energy
> this line will carry? Can environmentally-friendly, renewable, and
> sustainable energy sources be implemented i.e., solar, wind, or biomass,
> so
> this line is not necessary?

>
>

> What does Arizona get out of this deal? We generate the power, we destroy
> our landscape, we destroy our views, we destroy our animal habitats -
> California gets power.

>
>

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>

> Please help us protect these sensitive lands and stop this ill-advised
> proposal - again.

>
>

> For additional information on this project or to view the Draft EIR/EIS,
> go
> to: <http://www.cpuc.ca.gov/environment/info/aspen/dpv2/dpv2.htm>

>
>

> and for more information on writing comments, carpooling to the workshops,
> or for information on the line siting application please contact:

>
>

> Sandy Bahr at (602) 253-8633 / sandy.bahr@sierraclub.org or

>
>

> Jon Findley at (480) 756-2916 / energy@learnweb.com

>
>

> Thank you for caring! We hope you can make one of the workshops.

C3-2 cont.

Comment Set C3, cont.
Matt Kalina

- >
- >
- > Sandy Bahr
- >
- > Conservation Outreach Director
- >
- > Sierra Club - Grand Canyon Chapter
- >
- > 202 E. McDowell Rd, Suite 277
- >
- > Phoenix, AZ 85004
- >
- > (602) 253-8633
- >
- > fax (602) 258-6533
- >
- > grand.canyon.chapter@sierraclub.org

Responses to Comment Set C3 Matt Kalina

- C3-1 The commenter's opposition to the Proposed Project and his concern regarding its impact on wildlife habitat has been noted.
- C3-2 Please refer to Responses to Comment Set B1.

Comment Set C4
Wallace Nogueira Jr.



U.S. BUREAU OF LAND MANAGEMENT
CALIFORNIA PUBLIC UTILITIES COMMISSION
Draft EIR/EIS Comments



Proposed Devers-Palo Verde No. 2 Transmission Line Project

Date: 6/6/06
Name*: Wallace Nogueira Jr.
Affiliation (if any):* _____
Address:* 8 Anniversary Way
City, State, Zip Code:* Billerica, MA 01821
Telephone Number:* 617-828-9065
Email:* walabee23@yahoo.com

Comment: _____

How do you plan on evaluating the
value of property and compensating
land owners for land needed
for project?

Example - I own a parcel which
under the Alternative Plan would have
powerlines run through it. How would
I be compensated for that - ?

**Please print. Your name, address, and comments become public information and may be released to interested parties if requested.*

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be received by July 5, 2006. Comments may also be faxed to the project hotline at (800) 886-1888 or emailed to dpv2@aspnecg.com.

C4-1

Responses to Comment Set C4 Wallace Nogueira Jr.

C4-1 Please refer to Section D.14.5.3 (Project Effects on Property Values) in the Socioeconomics section (Section D.13) of the Draft EIR/EIS. This section addresses issues associated with the potential for impacts on property values and industrial facilities such as transmission lines in an effort to provide the reader with detailed background information based on extensive literature review and the property value issues of past similar projects. It should be noted that this section does not consider property values in the context of CEQA or NEPA and the determination of environmental impact, because: (1) there is no consistent evidence that industrial facilities negatively impact property values; and (2) there are no defined or adopted CEQA or NEPA standards for analysis of industrial project impacts on property values. As such, the information in this section is provided for the benefit of the public and decisionmakers. As cited in Section D.14.5.3 and CEQA Guidelines Section 15131, economic or social effects of a project per se are not considered as significant effects on the environment unless there is an indirect physical effect to the environment. However, such issues can be considered by the CPUC in its General Proceeding. In summary, as shown in detail in Section D.14.5.3, although there is evidence that transmission lines may have affected property values in some cases, the effects are generally smaller than anticipated, and greater detailed studies on the subject are required to determine a direct correlation between the siting of industrial facilities (such as transmission lines) and property values.

If the project is approved by the CPUC, SCE would have eminent domain rights in California. Therefore, if a parcel is required for the Proposed Project or for an alternative route that is approved, SCE would initiate negotiations with landowners and attempt to reach a mutually agreeable settlement. If an agreement cannot be reached, then SCE would be forced to take initiate a condemnation action in which fair market value of the property required for the project would be determined by the court.

Comment Set C5
Ms. Alecs Sakta

Devers–Palo Verde No. 2 Transmission Line Project

From: Alecs [blackcat@ecoisp.com]
Sent: Monday, June 19, 2006 4:36 PM
To: dpv2@aspeneq.com
Subject: Comments for Draft Environmental Impact Report/Draft Environmental Impact Statement

*Re: Southern California Edison's application with the California Public Utilities Commission and with the Arizona Corporation Commission to construct the Devers–Palo Verde No. 2 Transmission Line Project (DPV2), a 500 kV line that will cut across important and sensitive wildlife habitat, including the Kofa National Wildlife Refuge. *

My comments are as follows:

The primary route for this proposed line would cut through the KOFA National Wildlife Refuge.
Currently a Devers–Palo Verde line exists.

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. *There was a clause in the Desert Wilderness Act that excluded a right-of-way for the second line to cross the KOFA Wilderness. That is the primary route proposed for this line. *

CONCERNS:

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

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

Have any non-development alternatives been considered? Can California institute energy conservation programs equivalent to the amount of energy this line will carry? Can environmentally-friendly, renewable, and sustainable energy sources be implemented i.e., solar, wind, or biomass, so this line is not necessary?

*Sincerely,
Ms. Alecs Sakta
PO Box 41941
Tucson, AZ 85717

C5-1

C5-2

Responses to Comment Set C5
Ms. Alecs Sakta

- C5-1 The commenter's concern about the proposed transmission line through Kofa National Wildlife Refuge (NWR) is noted. Please refer to Responses B1-2 and B1-3.
- C5-2 Please refer to Response B1-6.

Comment Set C6
Joe Gardner

Devers–Palo Verde No. 2 Transmission Line Project

From: joe gardner [aaoprc@qwest.net]
Sent: Wednesday, June 21, 2006 3:51 PM
To: dpv2@aspeneg.com
Subject: [DPV2]:

I camp often in the KOFA mountains (once or twice a year for the last 10 years). I do not object to a second power line close to the existing one. I do not believe that it will be detrimental to the area. If you have any questions, please call, email or write me.

Joe Gardner
300 E. Willis, Suite B
Prescott, AZ 86301
phone 928 778 3691

C6-1

Responses to Comment Set C6
Joe Gardner

C6-1 The commenter’s support for the new line to be close to the existing transmission line is noted.

Comment Set C7 Carol Tepper

Devers–Palo Verde No. 2 Transmission Line Project

From: CAROL T. [carol_tepper@yahoo.com]
Sent: Saturday, June 24, 2006 9:42 AM
To: dpv2@aspenerg.com
Subject: Comments on Proposed Power Line

These are my concerns:

A second power transmission line would further fragment the habitat on the KOFA National Wildlife Refuge. By that standard alone the proposed line is incompatible with the mission of the refuge. The Right-of-Way through KOFA is prime desert bighorn sheep and desert tortoise habitat. The line will also further obstruct the natural view of the area that is pristine desert landscape and affect the wilderness values of the refuge.

C7-1

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.

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

C7-2

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?

C7-3

Thank You,

Carol Tepper
Box 1330
Grand Canyon, AZ 86023

Responses to Comment Set C7 Carol Tepper

- C7-1 The commenter's concern about the proposed transmission line through Kofa National Wildlife Refuge (NWR) is noted. Please refer to Responses B1-2 and B1-3.
- C7-2 Please refer to Response B1-4.
- C7-3 Please refer to Response B1-5.

Comment Set C8 Michael Quinlan

Devers–Palo Verde No. 2 Transmission Line Project

From: Quinlan, Michael [mquinl@midwestern.edu]
Sent: Wednesday, July 05, 2006 6:47 PM
To: Aspen Environmental Group
Subject: Comments on Devers/Palo Verde Power Line

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

To Whom It May Concern:

I am writing in regard to the Devers/Palo Verde No. 2 Transmission Line Project (DPV2) that has been proposed for western Arizona. I am **very opposed** to this project for two reasons.

First, I do not believe that the state of Arizona should become an “energy farm” for California. The population of Arizona is growing by leaps and bounds, and our claim to locally-produced energy should trump all others. California’s appetite for energy and other resources seems insatiable, and Californians should find ways to support their electricity needs using facilities located in California. The Arizona Corporation Commission should be planning for Arizona’s energy needs, not those of adjacent states.

My second objection to the DPV2 project stems from the fact that the line cuts through desert areas that are important biologically and aesthetically. Wildlife habitat and migration corridors for desert bighorn sheep and other organisms will be adversely impacted by this enormous project. In fact, the project Right-of-Way extends through prime habitat for sheep and desert tortoise. The line will also obstruct the natural view of a huge expanse of pristine desert.

For many reasons, the western deserts of Arizona are being degraded at a staggering rate. A large, intrusive project like DPV2 will greatly accelerate this degradation and cheat Arizonans of a resource that they need and deserve. Please encourage decision-makers to block DPV2. Thank you for the opportunity to comment on this process. Please keep me advised of future developments.

Sincerely,

Michael Quinlan
323 E. Solana Dr.
Tempe, AZ 85281
mquinl@midwestern.edu

C8-1

C8-2

Responses to Comment Set C8 Michael Quinlan

- C8-1 The commenter's opposition to the Proposed Project is noted. 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.
- C8-2 The Devers-Harquahala 500 kV line would be constructed immediately adjacent to the existing DPV1 500 kV transmission line, and would thus be located in an existing utility corridor.

The impacts to wildlife habitat and migration corridors (including impacts on bighorn sheep and desert tortoise) are addressed in Section D.2.6 in this EIR/EIS and in Impacts B-1 through B-17. Specifically, Impact B-12 discusses the construction impact to linkages and wildlife movement corridors. Mitigation measures developed in response to Impact B-7 (Construction activities would result in indirect or direct loss of listed wildlife or habitat) would include measures directed at minimizing impacts to the desert tortoise. Implementation of Mitigation Measures B-7b (Conduct pre-construction tortoise surveys) and B-7c (Purchase mitigation lands for impacts to tortoise habitat) would reduce impacts to the desert tortoise to less than significant levels. In response to Impact B-9 (Construction activities would result in indirect or direct loss of individuals or a direct loss in habitat for sensitive wildlife), Mitigation Measure B-9f (Perform construction outside of breeding and lambing period) has been proposed to reduce potential impacts to bighorn sheep to less than significant levels.

The effects of the proposed Devers-Harquahala 500 kV transmission line on visual resources are addressed in Section D.3.6 of this EIR/EIS. Impact V-2 specifically addresses the long-term visibility of land scarring in arid and semi-arid landscapes. Implementation of Mitigation Measures V-2a (Reduce in-line views of land scars), V-2b (Reduce visual contrast from unnatural vegetation lines), and V-2c (Reduce color contrast of land scars) would reduce this potentially significant visual impact to desert landscapes to less than significant levels. Specific Key Viewpoints and the resulting impacts of the new 500 kV line are addressed in Impacts V-3 through V-20 and include Mitigation Measures where appropriate (see Table D.3-11 in Section D.3.6). From three of these viewpoints, the visual impacts are considered to be significant and unmitigable (at the Harquahala Mountain Telecommunications Facility, within Kofa National Wildlife Refuge, and in the Alligator Rock Area of Critical Environmental Concern). Please refer to General Response GR-1 for a discussion of Kofa NWR and why the proposed route that would be adjacent to an existing line was found to be environmentally preferable to the establishment of a new corridor outside of the Refuge. Please also refer to responses to Comment Set E5 (Applicant comments on visual resources methodology) for a discussion of visual resources sensitivities.

The commenter's opposition to the Proposed Project is noted.

Comment Set C9
Peter Bengtson

Peter Bengtson
1280 E. Paseo Paxon
Tucson, AZ 85718
Phone (520) 219-3507
July 3, 2006

CPUC/BLM
235 Montgomery Street, Suite 935
San Francisco, CA 94104
Fax 1 (800) 886-1888
Email dpv2@aspeneq.com

Gentlemen:

I'm concerned with the environmental impact of a second electrical power line through the KOFA National Wildlife Refuge. Please add my protest to the record for the Line Siting Hearing of June 26.

C9-1

I have climbed peaks, hiked and traveled in the KOFA National Wildlife Refuge.

My concerns are:

1. A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV is incompatible with the mission of the refuge. The Right-of-Way (ROW) through KOFA is prime desert big horn sheep and desert tortoise habitat.
2. Nearly 400 acres would be affected through the KOFA National Wildlife Refuge, by a measured right-of-way that is 130 feet wide and 24 miles long. More than likely, however, additional land will be affected as construction vehicles travel along the first line's ROW and then across to the new ROW or completely out of the limits. This wide corridor, 560 feet wide, (130 + 300 + 130) could eliminate the necessary ground cover or protection needed by some species to traverse this area, making a boundary to limit their domain or an area of prey if they try to cross the ROW.
3. Mitigation of negative impacts to plant resources (i.e., transplanting cacti) was not successful during construction of the first power line. Major disturbances would occur at each of the 85 tower sites during construction for the pouring of the concrete footings and the equipment necessary to erect the towers and string the electric lines. Additional impacts would include establishment of invasive plant species in the disturbed areas and the increased probability of illegal use of the ROW by off-road vehicles.

C9-2

Comment Set C9, cont.
Peter Bengtson

4. The primary route is not an environmentally friendly route to plan the ROW but the alternative routes are not good routes either. The proposed routes destroy pristine desert views, cross critical desert habitat, go through populated areas, and would destroy desert environments.

C9-2 cont.

5. 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 will not have any additional electrical energy to transport out of the area. Since it is likely that the power will be needed in Arizona in the near future. The line should not be built.

C9-3

6. There were many factors that caused the “Rolling Blackouts” in California a few years ago. One of the main reasons was a struggle between the regulators and the power companies and the energy companies withholding electricity to drive up the price. The decision on this additional power line should not be based on the contrived rolling blackouts.

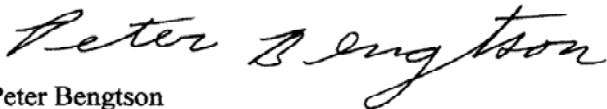
The following questions need to be answered before we permit the degradation of the KOFA National Wildlife Refuge which this second power line will cause.

C9-4

Have any non-development alternatives been considered? Can California institute energy conservation programs equivalent to the amount of energy this line will carry? Can environmentally-friendly, renewable, and sustainable energy sources be implemented i.e., solar, wind, or biomass, so this line is not necessary?

C9-5

Sincerely,



Peter Bengtson

Responses to Comment Set C9 Peter Bengtson

- C9-1 The commenter's concern about the proposed transmission line through Kofa National Wildlife Refuge (NWR) and opposition to the project is noted. Please refer to Responses B1-2 and B1-3.
- C9-2 Please refer to Response B1-4.
- C9-3 Please refer to Response B1-5.
- C9-4 Please refer to Responses C9-1 through C9-3 and C9-5.
- C9-5 Please refer to Response B1-6.

Comment Set C10
Mary Justice

July 12, 2006

Billie Blanchard, Project Manager, Devers-Palo Verde 2
c/o Aspen Environmental Group
235 Montgomery Street
San Francisco, CA 94104-3002

Re: Comment on D-EIR - Devers - Palo Verde2 (D-PV2) effect of project on development of 30 ac. and habitat concern on APN 651-030-004 (Riverside County, CA)

C10-1

Dear Ms. Blanchard:

Thank you for having the maps, CD and executive summary sent to me so quickly.

We are in the process of obtaining plans to build 6 houses on 30 acres near your project. Will your project cause a delay in our construction plans?

We have already had a delay caused by the proposed Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). It failed to be adopted by Desert Hot Springs. The Plan required adoption by all the cities in the Coachella Valley Association of Governments (CVAG) and did not get adopted. Now is our window to build.

We have had to sue CVAG and its CVMSHCP, as well as the Coachella Valley Water District (CVWD) regarding the EIR on the CVMSHCP. See Riverside Superior Court case number RIC 451297.

CVWD and the Army Corps of Engineers(ACE) devised a levee system to escort "blow-sand" onto the Coachella Valley Fringe-Toed Lizard Preserve (CVFTLP). According to ACE's documents a special sand is disturbed every 500 years, and may be blown to a desired site. Any 100 year flood could easily be managed by additional dikes such as the one already in existence across Ramon Road. The levees proposed as flood control measures for a 500 year flood are not justified and will directly interfere with the 500 kV Devers-Palo Verde 2 power lines.

C10-2

We are concerned that D-PV2 may be held up by conflicts with conservationists and CVWD's proposed levee system in our area west of the CVFTLP. Our 30 acres has frontage on the well-paved Ramon Road and is near the I-10 interchange. It has a 12" water line in the street and abuts wide-open land owned by the conservationists. You can see why we want to build. But, It is also a few hundred feet east of Edison's Mirage sub-station and perhaps 1000 feet south of the transmission lines and the D-PV2 alignment in Thousand Palms, California. A map is attached to this letter.

If you think your project will interfere with our building or CVWD's proposed levees please let us know.

Very truly yours,

Mary Justice
3998 Avenida Verano
Thousand Oaks, CA 91360
(877) 692-8214, (805) 531-9529

Responses to Comment Set C10 Mary Justice

C10-1 The DPV2 project and the proposed residential development project described by the commenter are unrelated in their review and approval processes. The commenter's proposed housing project requires Riverside County approval and the DPV2 Project requires State (CPUC) and federal (BLM) approval. In addition, construction related to the Proposed Project would not be located on the commenter's parcel (APN 651-030-004, County of Riverside Transportation and Land Management Agency GIS at <http://www2.tlma.co.river-side.ca.us/aims/pa/rclis/>). The Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) is also independent of the DPV2 project even though its requirements would also affect DPV2. Regardless, the Final Draft of the CVMSHCP is discussed in Section D.2.1.1.4 on page D.2-51 of the Draft EIR/EIS as it relates to applicable regulations, plans, and standards associated with Biological Resources.

Even though the projects are unrelated, mitigation measures in Sections D.4 (Land Use) and D.9 (Transportation and Traffic) are expected to reduce potentially significant impacts from construction activities on land uses near the transmission line and on all affected roadways. For instance, Mitigation Measure L-1a would require the preparation of a construction notification plan and Mitigation Measure T-7a would require SCE to repair any roadways damaged by construction activities.

Table F-1 in Section F.2.1 has been updated as shown below to add the planned housing development described in this comment letter as a project included in the cumulative scenario. The construction of multiple projects within the same area would create a significant cumulative construction impact to adjacent residential land uses. Given the existing cumulative land use impact that would occur from the construction of multiple projects, including the commenter's proposed residential development, the construction of the Proposed Project would incrementally contribute to this cumulative effect. However, potentially significant cumulative impacts resulting from the construction of the Proposed Project in conjunction with other projects would be mitigated to a less than significant level through the implementation of the following mitigation measures that were introduced in Sections D.4.6 and D.4.7 of the Draft EIR/EIS: Mitigation Measures L-1a (Prepare Construction Notification Plan), L-1d (Coordinate with affected business owners), and L-1e (Coordinate construction schedule with public and community facilities).

Once constructed, the commenter's planned residential project would be permanently visible. However, as projects such as the commenter's are developed in the same field of view as the proposed DPV2 Project these projects would reduce or close lines of sight to the transmission corridor for observers on roadways (e.g., on Ramon Road). This would result in the Proposed Project being less visible from within developed areas. Overall new housing developments are incorporated into city and county land use planning and cumulative impacts resulting from the construction of six houses in conjunction with the proposed DPV2 Project would be less than significant.

Table F-1. DPV2 Cumulative Project List

Project	Type	Location	Status	Map No.
<u>HOUSING DEVELOPMENT: Proposed construction of 6 houses on 30 acres.</u>	<u>Residential</u>	<u>APN 651-030-004 in Thousand Palms. East of Mirage Substation and 1,000 feet south of transmission corridor</u>	<u>In planning/permitting (7/12/06)</u>	<u>N/A</u>

C10-2 The proposed “blow sand” levees are separate from the DPV2 project. Impact H-6 (Encroachment into a floodplain or watercourse by permanent aboveground project features resulting in flooding, flood diversions, or erosion) in Section D.12.6 discusses the impacts of the Proposed Project where it would be located in a floodplain. Applicant Proposed Measures (APMs) W-4 through W-6 were designed by SCE to avoid adverse local effects related to floodplain encroachment by avoiding watercourses where possible, ensuring foundations are adequate to resist scour, and constructing diversion dikes in severe cases (see Table D.12-3). In addition, Mitigation Measure H-6a (Design diversion dikes to avoid damage to adjacent property) would ensure that the diversion dikes would be designed to avoid damage to adjacent properties. Therefore, in addition to the implementation of the APMs and proposed mitigation measures, and because the transmission lines would be overhead and could span any major watercourses and drainage outlets, impacts related to floodplains in the project area have been considered and were found to be less than significant.

Mitigation Measure B-7d (Purchase mitigation lands for impacts to fringe-toed lizard habitat) has been proposed for implementation to reduce impacts specifically to the CVFTL related to construction activities (Impact B-7, Construction activities would result in indirect or direct loss of listed wildlife or habitat) to less than significant levels.

Please refer to Response C10-1 for discussion of the inclusion of the proposed residential development in Table F-1 under the Cumulative Scenario in Section F of the EIR/EIS.

Comment Set C11 Les Starks

Devers–Palo Verde No. 2 Transmission Line Project

From: SNOWCREEKPRES@aol.com
Sent: Wednesday, July 26, 2006 2:39 PM
To: dpv2@aspenerg.com
Subject: DPV2, National Monument and the Northern Face of Mt. San Jacinto

The Devers Palo Verde No. 2 Alternative will compromise, seriously degrade and detract from the spectacular scenic beauty of the magnificent Northern Face of Mt. San Jacinto and the Santa Rosa and San Jacinto Mountains National Monument and it will leave the Snow Creek area vulnerable to even greater degradation and visual blight by a proposed windmill development.

C11-1

I spoke to a representative from White Water Energy in Oct, 2004 regarding his company's plan for a large scale windmill farm in the area between Snow Creek Road and the Interstate 10 Freeway extending up the western ridgeline of the San Jacinto Mountains following SCE's existing power lines. He seemed certain that the Cabazon Ridge project would be approved after SCE's new power lines were installed. He said he was confident that the Riverside County Board of Supervisors would approve his plan because there would already be a clutter very high profile industrial structures on the San Jacinto Mountains' westernmost mountaintop ridgeline anyway. When Enron Wind, the past leaseholder of the land wanted to construct a 600 acre windmill farm in the same area in 2001, two of the Riverside County Planning Commissioners used the same argument, saying SCE's existing power lines through the area have already significantly degraded the landscape, so why would windmills be so objectionable. If SCE adds even more high profile power lines, this argument will be used again by Riverside County and the Palm Springs area could loose an important landmark visual and recreational resource to inappropriately sited industrial power structures and massive electrical lines.

C11-2

The oppressive presence the DPV2 at the western entrance of the Santa Rosa and San Jacinto Mountains National Monument which is the first scenic area, photo opportunity and hiking destination for desert visitors arriving via the Interstate 10 freeway will greatly detract from the viewshed, general ambiance and quality of this unique desert wilderness area.

C11-3

A key location in the Coachella Valley Multi Species Habitat Conservation Plan, Snow Creek is home to many threatened or endangered plant and animal species. In this unique group of canyons (Snow Canyon, Los Osos Canyon, Vargas Canyon) known as Snow Creek, there is abundant water and evidence of ancient life.

C11-4

It's many unusual features include a towering waterfall which can be viewed from Snow Creek Road, the spectacular Northern Face of Mt. San Jacinto, the Oasis de Los Osos Preserve, the Snow Creek Rock Shelter (Riv. 30) and bedrock mortars, all of which should be carefully considered in this decision.

C11-5

The presence of additional high profile power lines may also lead to the general dadation of the National Monument by visitors who see it as an industrial area.

Snow Creek is a high wind, high risk fire area that suffered greatly when SCE put the first towers and power lines through the San Jacinto Mountains. The SCE crew constructing the towers started a welding fire that swept through Snow Creek Village. Two homes were gravely threatened by the fire. Both had smoke damage and lost trees and landscaping. The fire raced up the mountain and firemen fought it for two days.

C11-6

I can most certainly understand why the Morongo would not want these power lines strung through their reservation land, especially since they have so many already. But I really can not understand them wanting it to go through Snow Creek, home to their ancient relatives, on land all local Indians consider sacred. Indian historian, Alvino Siva has said that all local Indians consider the entire Snow Creek area sacred land that is critically important to their people, their history, their culture. It's unfortunate that these power lines will change and blight land that is so important to all our local Indians and some kind of agreement hasn't been made to prevent this and future degradation of this dramatically beautiful area by industrial development.

C11-7

Sincerely,
Les Starks
164 Vista De Oeste
Palm Springs, Ca. 92264
(760) 285-2970
(760) 323-4089

Comment Set C11, cont.
Les Starks

Devers–Palo Verde No. 2 Transmission Line Project

From: SNOWCREEKPRES@aol.com [mailto:SNOWCREEKPRES@aol.com]

Sent: Monday, July 31, 2006 7:23 PM

Subject: Re: DPV2 Comment Letter

I'm speaking for myself as someone who uses the National Monument like everyone else who goes to Snow Creek to retreat from a rapidly urbanizing Coachella Valley. I am also a Palm Springs and San Gorgonio Pass property owner who has seen the progressive destruction of the Pass area since I moved to Palm Springs in 1985. What used to be some of the world's most beautiful ancient vistas have been destroyed by giant power lines and industrial windmills.

C11-8

The public hearing for this development wasn't even mentioned in any local newspaper or media report. So how can people comment on this when they don't even know it's happening?

C11-9

Les Starks

Responses to Comment Set C11 Les Starks

C11-1 The visual impacts related to the Devers-Valley No. 2 Alternative, including the segment through the Santa Rosa and San Jacinto Mountains National Monument, are discussed in Section D.3.9.1 of the Draft EIR/EIS. Key Viewpoint 33 was established on the Pacific Crest Trail, just west of Snow Creek Road and the Snow Creek Village (see page D.3-195). Figures D.3-34A, D.3-34B, and D.3-35 depict the existing setting and simulations with the addition of the DV2 transmission line. Visual impacts from the following three key viewpoints were found to be significant and unmitigable (Class I) impacts:

- Impact V-40 [Increased structure contrast and skylining when viewing the San Jacinto Mountains from Key Viewpoint 33 on the Pacific Crest Trail in the vicinity of the Snow Creek Village residential community (VS-VC)]
- Impact V-41 [Inconsistency with BLM VRM Class II management objective due to introduction of structure contrast and industrial character when viewing the San Jacinto Mountains from BLM-managed lands within the Santa Rosa and San Jacinto Mountains National Monument (in the vicinity of Key Viewpoint 33)]
- Impact V-42 [Inconsistency with U.S. Forest Service Integrity Objective (SIO) due to introduction of structure contrast and industrial character].

Mitigation Measure V-40a (Reduce visual contrast of towers and conductors) would help to minimize the visual impacts of the new structures by matching the design of the new structures with the existing structures, placing new and existing structures as close together as possible, matching spans and tower heights, using non-specular design, and prohibiting new access roads downhill from structures; however, the impact was still determined to be significant.

See Response C11-2 regarding the proposed windmill development.

C11-2 Section F.3.2 in the Draft EIR/EIS states that the Proposed Project and the cumulative energy projects, such as wind turbines, combined would result in a perceived increase in industrialization of the landscape, diminution of visual quality, and increase in visual contrast. The resulting cumulative visual impacts would be substantially greater than those that would occur with the Proposed Project alone and they would be significant. This would be the result of a significant change in the character and visual quality of the viewshed. Under the Devers-Valley No. 2 Alternative, cumulative analysis in Section F.4 (page F-63) of the Draft EIR/EIS states that there are cumulative energy infrastructure projects that may occur in the I-10 corridor and would be within the same field of view at various locations. These projects would exhibit similar vertical structural form, structural complexity and industrial character compared to the Devers-Valley No. 2 Alternative.

Any of the alternatives and the cumulative energy infrastructure projects combined would result in a perceived increase in industrialization of the landscape, contributing to a sense of proliferation of energy infrastructure in the vicinity. The resulting cumulative visual impacts would be substantially greater than those that would occur with the alternative alone and they would be significant (Class I). Therefore, a significant visual impact has been identified already. Likewise, the Wilderness and Recreation section (page F-65) also identified a significant (Class I) cumulative recreation impact to the Santa Rosa and San Jacinto Mountains National Monument.

The Cabazon Ridge Project has been added to the cumulative scenario, however, the analysis would remain as significant visual and recreation resources cumulative impacts (Class I). Table F-3 in Section F.4 of the Draft EIR/EIS has been updated as follows:

Table F-3. Devers-Valley Cumulative Project List

Project	Type	Location	Status	Map ID
Riverside County				
<u>Cabazon Ridge Project: large-scale wind farm proposed by White Water Energy.</u>	<u>Industrial</u>	<u>Between Snow Creek Road and I-10, extending up the western ridgeline of San Jacinto Mountains</u>	<u>Planning</u>	<u>N/A</u>

C11-3 Please refer to Response C11-1. Section D.5.9.1 discusses the Wilderness and Recreation impacts of the Devers-Valley No. 2 Alternative, including through the Santa Rosa and San Jacinto Mountains National Monument. Impacts from temporary construction activities (Impact WR-1) were found to be potentially significant (Class II), but reduced to less than significant with the implementation of Mitigation Measures WR-1a (Coordinate construction schedule and activities with the authorized officer for the recreation area) and WR-1b (Provide a temporary detour for Pacific Crest National Scenic Trail users). Impacts due to permanent preclusion of recreational activities during operation (Impact WR-3) would be reduced to less than significant levels with implementation of Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area). Impact WR-2 (Operation would change the character of a recreation or wilderness area, diminishing its recreational value), however, would be significant and unmitigable (Class I).

C11-4 The Devers-Valley No. 2 line would cross Snow Creek Road (near Tower DV-25 on Figure Ap.1-8a) and the ROW would turn southwest and would be adjacent to Snow Creek Road on the flat portion of the Monument lands, approximately 2,350 feet to the west until it would enter the San Jacinto Wilderness¹ at Tower DV-32 that is located within the SBNF (although the transmission corridor itself has been removed from the wilderness). Therefore, the line would be over 3,000 feet west-northwest of Snow Creek Village and the alluvial fan of Snow Creek is located east of the Village and would not be impacted by the transmission line.

Regardless, the requirements of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) would apply to the construction and operation of the DPV2 project, including the Devers-Valley No. 2 Alternative if it were approved. The Final Draft of the CVMSHCP is discussed in Section D.2.1.1.4 on page D.2-51 of the Draft EIR/EIS as it relates to applicable regulations, plans, and standards associated with biological resources. The biological resources setting in the Coachella Valley MSHCP area, including sensitive plant and wild-life species and habitats, is discussed on pages D.2-69 and D.2-75 of the Draft EIR/EIS. Biological resources impacts in the area included in the Coachella Valley MSHCP are discussed for the Proposed Project in Sections D.2.6 and the biological setting and impacts in the Coachella Valley area with construction of the Devers-Valley No. 2 Alternative are discussed in Section D.2.8 of the Draft EIR/EIS.

¹ While the corridor is within the overall designated wilderness area, the Devers-Valley right-of-way was removed from wilderness by Congress for use as a transmission corridor.

Hydrology and Water Quality setting and impacts, including within the Coachella Valley, are discussed in Section D.12 and Cultural Resources setting and impacts are discussed in Section D.7.

C11-5 The resource value of the Snow Creek area is noted. However, the Devers-Valley No. 1 transmission line, and its access road, is already present in the area and a transmission corridor has been established. Please refer also to Responses C11-1, C11-3, and C11-4. There is no record at the California Historical Resources Inventory System that the Snow Creek Rock Shelter (CA-RIV-30) and bedrock mortars are within a half-mile of the Devers-Valley No. 2 Alternative. While this may be a significant archaeological site, there will be no direct or indirect impact to any cultural resources that are more than 200 feet from proposed towers, roads, and construction laydown areas.

C11-6 As described in Sections D.10.12.2 in the Final EIR/EIS (the same discussion was included in both Sections D.10.11.2 and D.10.12.2 of the Draft EIR/EIS, but was consolidated in the Final EIR/EIS), fire hazard related to transmission lines (Impact PS-4) is addressed in project design and in operations and maintenance procedures. Electrical arcing from power lines can represent a fire hazard. This phenomenon is more prevalent for lower voltage distribution lines since these lines are typically on shorter structures and in much greater proximity to trees and vegetation. Fire hazards from high voltage transmission lines are greatly reduced through the use of taller structures and wider ROWs. Further, transmission line ROWs are cleared of trees to control this hazard. Fire hazards due to a fallen conductor from an overhead line are minimal due to system protection features. Overhead high voltage transmission lines include system protection designed to safeguard the public and line equipment. These protection systems consist of transmission line relays and circuit breakers that are designed to rapidly detect faults and cut-off power to avoid shock and fire hazards. This equipment is typically set to operate in 2 to 3 cycles, representing a time interval range from 2/60 of a second to 3/60 of a second. SCE is required to design the transmission line in accordance with safety requirements of the CPUC's G.O. 95 and other applicable requirements, so safety impacts from fire hazard are considered to be less than significant (Class III). See also Response B6-17 regarding transmission line construction and operation and fire hazard.

C11-7 The commenter's opposition to the Devers-Valley No. 2 Alternative through the Snow Creek area has been noted. Cultural resources setting and impacts for the Devers-Valley No. 2 Alternative are discussed in Section D.7.9.1 of the Draft EIR/EIS and impacts from the West of Devers upgrades, which includes the portion of the route through Morongo lands, is discussed in Section D.7.7.

As shown in Table E-4 in Section E (Comparison of Alternatives) both the Proposed Project and the Devers-Valley No. 2 Alternative would have significant (Class I) impacts to known historic properties and/or unknown archaeological resources. The Proposed Project west of Devers Substation would have potential impacts to 3 known historic and prehistoric sites in the surveyed portion of the route whereas the Devers-Valley No. 2 Alternative would have potential impacts to 11 sites. Therefore, the proposed West of Devers upgrades were found to be preferred for cultural resources than the Devers-Valley No. 2 Alternative that goes through the Snow Creek area.

C11-8 Please refer to Responses C11-1 and C11-3.

C11-9 Please refer to Section I (Public Participation) in the Final EIR/EIS. This section addresses the notification process related to the release of the Draft EIR/EIS and list the newspapers in which public notices have been published.

Comment Set C12
Bettina Bickel

Devers–Palo Verde No. 2 Transmission Line Project

From: Bettina Bickel [bbickel@ecoisp.com]
Sent: Monday, July 31, 2006 11:21 AM
To: dpv2@aspenerg.com
Subject: Draft EIS Devers-Palo Verde No. 2 Transmission Line

Dear EIS Team,

I have the following concerns about the proposed second transmission line through the KOFA National Wildlife Refuge:

- The right of way through KOFA cuts through prime habitat for desert bighorn sheep and desert tortoise. A second line would further fragment and reduce the quality/quantity of habitat, and is incompatible with the purpose of the wildlife refuge. The transmission line would also negatively impact wilderness values and the viewshed.
- The widening of the corridor to approximately 560 feet would eliminate ground cover essential for some species, essentially creating a barrier to wildlife movement.
- The construction of and access to the transmission line would destroy native plants and allow establishment of invasive species. It would increase the probability of illegal use of the right-of way by ORVs.

The KOFA NWR is important to me to preserve Arizona's native desert ecosystems. Thank you for considering my comments on this proposal.

Bettina Bickel
9218 N. 51st Dr.
Glendale, AZ 85302

C12-1

C12-2

Responses to Comment Set C12 Bettina Bickel

- C12-1 Please refer to Responses B1-2 and B1-3 and General Response GR-1 regarding impacts in the Kofa NWR.
- C12-2 Please refer to Response B1-4 and General Response GR-1. By using an existing transmission right-of-way through the area, existing access roads would be utilized for most construction activities. In contrast, the potential alternatives that would avoid the Kofa NWR that were investigated to avoid the Kofa NWR (documented in Appendix 1, Alternatives Screening Report) would create a new corridor with associated ground disturbance (there are few usable access roads and the routes would be 3.4 to 10 miles longer than the portion of the Proposed Project that each would replace). Therefore, use of the existing DPV1 corridor for the proposed line would minimize the amount of new access roads created. Because these access roads already exist, construction of the new line would not cause an increased probability of illegal use of the right-of-way by ORVs.

Comment Set C13
Richard Strandberg

P.O. Box 42017
Tucson, AZ 85733
27 July 2006

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

This is to express my personal opinions regarding a proposed 500 kilovolt electric power transmission line between the Palo Verde Nuclear Generating Plant west of Phoenix, Arizona and the Devers Substation in southern California.

C13-1

I believe that this proposed transmission line would be irreparably deleterious to the scenic resources, wildlife and native vegetation of Kofa National Wildlife Refuge in western Arizona.

With the Phoenix Metropolitan Area undergoing a tremendous growth now and in the future, the current and future generating capacity of the Palo Verde Power Plant will be needed in Arizona.

C13-2

In addition to promoting wise electrical conservation practices in southern California, there is also a basic need for more pollution-free nuclear generating

C13-3

Comment Set C13, cont.
Richard Strandberg

27 July 2006

Page 2 of 2

facility sites in southern California. The San Onofre Nuclear Generating Plant on the Pacific Coast between Los Angeles and San Diego is good as far as it goes but is inadequate to supply California's growing population. There are suitable sites in southern California's interior that would have a relatively low environmental impact, and would be less visible on scenic landscapes than the multitude of wind turbines around San Geronimo Pass and Tehachapi Pass.

C13-3 cont.

In summary, there are many residents of Arizona who see no advantage to this proposed power line.

C13-4

Sincerely,

Richard Strandberg

Responses to Comment Set C13 Richard Strandberg

- C13-1 The commenter’s opposition to the Proposed Project in the Kofa NWR is noted. Please refer to General Response GR-1 for a discussion of why the route through the Kofa NWR was found to be the environmentally preferable over potential alternatives outside of Kofa. Also refer to the responses to Comment Set B1.
- C13-2 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.
- C13-3 Please refer to Response B1-6 for a discussion of conservation as an alternative to the Proposed Project.

Due to environmental and safety concerns, California law currently prohibits the construction of any new nuclear power plants in California until the California Energy Commission (CEC) finds that the federal government has approved and there exists a demonstrated technology for the permanent disposal of spent fuel from these facilities.² In June 1976, California enacted legislation directing the CEC to perform an independent investigation of the nuclear fuel cycle. This investigation was to assess whether the technology to reprocess nuclear fuel rods or to dispose of permanently high-level nuclear waste had been demonstrated, approved and was operational [Public Resources Code 25524.1 (a) (1), 25524.1 (b), and 25524.2 (a)]. After extensive public hearings, the CEC determined that it could not make the requisite affirmative findings concerning either reprocessing of nuclear fuel or disposal of high-level waste. This information was published in a report: *Status of Nuclear Fuel Reprocessing, Spent Fuel Storage and High-level Waste Disposal*, Energy Commission publication P102-78-001, January 1978.) As a result, the development of new nuclear energy facilities in California was prohibited by law.

It has been more than 25 years since the last comprehensive CEC assessment of nuclear power issues; therefore, as part of the development of the CEC’s *2005 Integrated Energy Policy Report*,³ the CEC has begun a comprehensive assessment of the status of currently operating plants in California, the status of federal spent fuel storage/disposal programs and reprocessing, and the potential role of nuclear power in California’s energy future. At this point though, the permitting of new nuclear facilities in southern California would not be feasible.

- C13-4 Please refer to General Response GR-2 for a discussion of Arizona benefits from the Proposed Project.

² California Energy Commission. 2006. Nuclear Energy in California. Online at <http://www.energy.ca.gov/nuclear/california.html>.

³ California Energy Commission. 2005. *2005 Integrated Energy Policy Report*. Docket # 04-IEP-1, et al. Online at <http://www.energy.ca.gov/2005energypolicy/index.html>.

Comment Set C14
Thomas L. Floyd

P.O. Box 941
Ojo, AZ 85321
July 30, 2006

CPUC - BLM
% Open Environmental Group
235 Montgomery St., Suite 935
San Francisco, CA 94104

Dear CPUC - BLM :

I have reviewed the Executive Summary and a portion of the general material for the Draft Environmental Impact Report and Statement for the Devers - Palo Verde No. 2 Transmission Line Project and submit the following comments for your consideration,

The presentation and maps reflect a high degree of professionalism. It is gratifying to know that California is making an effort to increase its utilization of nuclear energy, as this source and hydroelectric power appear to be the best solutions for clean energy on the large scale ~~scale~~ needed to correct the state's power shortages and excessive costs. It is my understanding that importation from Arizona is preferable to building nuclear facilities in California because of geologic realities.

I am familiar with most of the existing and proposed corridors in Arizona and parts of California, having camped numerous times and explored many

C14-1

C14-2

Comment Set C14, cont.
Thomas L. Floyd

2

of the areas and scouted for big-horn sheep. It makes sense to place the new lines within the existing rights-of-way as described in the Preferred Alternative. To build new lines elsewhere would double the number of corridors and disturb and disrupt the land and habitat and hurt property values. Land uses, ecosystems, and sheep habitat are fairly well adapted to the existing rights-of-way. The only advantage that new corridors might offer would be the creation of new jeep trails for outdoor recreation and camping if on public land.

C14-2 cont.

As to "alternative sources of energy" as preferred by some groups, the facts are clearly against such proposals. Wind power creates a visual blight on our landscapes and ridges and would require the construction of additional lines in a greater number of corridors. Wind power would also be unreliable in meeting power schedules. Moreover, wind power kills birds and likely would disturb sheep.

C14-3

As to solar power as an alternative, this source is useful on smaller scales in remote areas for re-charging batteries and is not practical or available on the scale needed by the industries and by the large population of California. As to propane and natural gas, these sources as fuels for the generation of electricity are very expensive and are

Comment Set C14, cont.
Thomas L. Floyd

3

in short supply.

Moreover, the report makes a good point that any type of energy ~~source~~ on the scale needed would still require new lines for transmission. And if the alternative sources were workable, I have no doubt that the electric companies and cooperatives would be the first to bring them into the system.

C14-3 cont.

Tower architecture should be given more attention by Southern California Edison and by BLM and CPLIC. The proposal or plan to use traditional lattice steel towers in most areas, to match existing structures, would only compound the problem of aesthetics. The single-pole reinforced concrete ^{towers}, or some steel-pole towers with well-designed arms are generally considered to blend well into desert and cactus landscapes even to the point of being notable architectural works. While there may be ^{short-term} visual conflict in having two types of towers side-by-side, in the long term, years or decades hence, the existing traditional towers may be scheduled for replacement and upgrading to the modern architecture as well. Now is the time to get started, with the new lines. Incidentally, I am not sure that single-pole steel towers as depicted in Photo 1, page B-33, ^{qualify} as the best single-pole architecture compared with some others that I have seen along multi-use corridors.

C14-4

Especially in populated areas and near rivers

14-5

Comment Set C14, cont.
Thomas L. Floyd

4

and BLM camping areas, the company would do well to add trails and landscaping to match the advances in tower architecture. The photograph on page B-41 shows an example of past accomplishment in landscaping but not in tower design.

C14-5 cont.

The further development of electric power will create a better life for all and thus a better environment, as I can attest because we did not get electricity at our rural home place until I was 15. I appreciate the opportunity to look over the proposals and furnish my own assessments.

C14-6

Sincerely,

Thomas L. Floyd

Responses to Comment Set C14 Thomas L. Floyd

C14-1 Please refer to Response C13-3 for a discussion of nuclear energy in California.

Hydroelectric power is discussed in Section 4.5.2 of Appendix 1 and in Section C.5.5.2 of the Draft EIR/EIS. While hydropower does not require burning fossil fuels and may be available (e.g., on the Colorado River or a local water resource), this power source can cause significant environmental impacts. Negative aspects of hydroelectric development primarily center around inundation to reaches of stream and riparian lands as a result of dam and reservoir development, resulting in permanent changes to the environment. Significant impacts also include creating barriers for fish passage, displacing native plant and animal species, and eliminating whitewater recreation areas. Hydroelectric developments with large water storage components can create the potential for flooding downstream from high releases during storm events or due to catastrophic dam failures. Construction of new dams and maintenance of old structures must undergo rigorous design analyses that demonstrate the ability to perform safely under the most adverse seismic and flood conditions. As a result of these impacts, it is extremely unlikely that new large hydropower facilities could be developed and permitted in California within the next several years.

C14-2 The commenter's support for the use of an existing ROW has been noted. Please refer to General Response GR-1 for a discussion of the use of an existing corridor as the environmentally preferable route through Kofa NWR in Arizona. Please refer to Response C4-1 for a discussion of property value as it relates to the construction of transmission lines.

C14-3 Renewable generation resources alternatives (geothermal, biomass, solar, wind, and hydroelectric resources) are also evaluated in Section 4.5.2 of Appendix 1, Section C.5.5.2, and Executive Summary Section 2.3.4 and were eliminated from full consideration during the screening process. Use of renewable generation technologies would avoid the specific impacts associated with the construction and operation of the proposed DPV2 project, but new transmission lines would still be required from the renewable generation locations to areas of demand. This would create impacts similar to those of the Proposed Project, which is proposed to transmit power from an existing generation sources. In addition to the reliability and feasibility issues discussed in Appendix 1 and Section C, use of renewable resources would be inconsistent with the objectives of the proposed DPV2, which are focused on creating the ability for DPV2 to increase California's transmission import capability from the Southwest and enhance and support the competitive energy market in the Southwest.

C14-4 As discussed in Section D.3.6 of the Draft EIR/EIS, implementation of proposed Mitigation Measures V-2a (Reduce in-line views of land scars), V-2b (Reduce visual contrast from unnatural vegetation lines), V-2c (Reduce color contrast of land scars), V-3a (Reduce visual contrast of towers and conductors), V-6a (Reduce visual contrast associated with ancillary facilities), and V-6c (Reduce night lighting impacts), which are listed in Table D.3-11 in Section D.3.11 of the Draft EIR/EIS, all supplement vegetation restoration following construction and landscaping to help reduce the visual contrast, view blockage, and skylining of proposed towers and facilities.

The comment states that tubular steel poles (TSP) "...are generally considered to blend well into desert and cactus landscapes even to the point of being notable architectural works." It is assumed that this is a reference to the cylindrical form and vertical lines shared by TSPs and some species of cactus (Saguaro, for example). However, this notion fails to recognize that the structural scale of TSPs would dominate any similar, natural forms particularly when viewing at greater distance. Rather than attempting to achieve architectural statements with structure design, design and mitigation efforts should more appropriately focus on reducing structure visibility. It is true that TSPs are often more visually appropriate for close proximity views. In these circumstances, the narrower structural mass blocks a lesser degree of higher valued background landscape features compared to lattice structures. In close viewing circumstances lattice structures with their complex structural members appear somewhat more industrial in character, create more visual contrast, and effectively block a greater portion of background landscape compared to TSPs. This is so even though portions of the landscape can be seen through the structure.

However, for distant views, such as those that are predominant in open desert landscapes, the open structural designs of lattice towers render the structures somewhat transparent, particularly when viewed at distance with any type of landform in the background. This characteristic allows the structures to blend quite effectively with the background, which significantly reduces structure visibility in many cases. This fact is born out in a number of the images presented in the EIR/EIS that illustrate the difficulty in seeing the lattice structures when backdropped by mottled landforms. Thus, it is the opinion of the EIR/EIS visual resources specialist that lattice structures are more appropriate than TSPs in the broad, open desert landscapes with the typically distant sightlines available to travelers on freeways, local roads, and 4WD recreational trails.

C14-5 Please refer to Response C14-4.

C14-6 The commenter's support for the development of electric power has been noted.