

Comment Set C29 Donald G. Begalke

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Comments on the Draft Environmental Impact Report/Environmental Impact Statement on the Southern California Edison Company's Application for a proposed Devers-Palo Verde No.2 500kV Transmission Line Project:

C29-1

Comments made are for the Arizona part of the proposed Project, the 500kV transmission line from the Colorado River to the Palo Verde Nuclear Generating Station near Wintersburg, Arizona. Comments are not necessarily in any specific order or format.

Since the May 4, 2006 publication of this Draft EIR/EIS, during late May I received the following: a copy of the Executive Summary, and Volumes I, II, and III identified as Environmental Analyses.

Subsequently, it is very disappointing to learn that not all Arizonans participating in these EIR-/EIS processes received the same, the summary and the 3 volumes. The Public commenters are individuals/organizations, and all should have had the same materials to read, to assess and to verify for commenting on this draft. When the utility's proposal affects two (or more) U.S. States, as an Arizonan I do not know how or whether comments affect the CEQA for California. For the Final EIR/EIS of NEPA and the Az. part of the proposal, concern exists that the US Fish and Wildlife Service is not equally a federal agency writing the EIR/EIS, especially when the Kofa National Wildlife Refuge would be affected if the proposed 500kV line becomes reality.

Should separate EIR/EIS drafts have been written for the Az. and the Ca. parts of the proposal because SCE's application in Ca. is much more than the proposed Devers-Palo Verde No.2 Line in Ca.? Arizonans do note differences in the processes, especially in months being allowed to participate in the scoping processes. Worse, the largest group of Arizonans not receiving a notice on the proposal and the scoping meetings is the "ratepayers" in our State because their electric bills will undoubtedly be affected upwardly if the proposal becomes a reality.

Prior to attending an "informational meeting" or workshop of the BLM and CPUC processes, I had to ask what a workshop would do and who else, beside Public attendees, would be attending the meeting in Az. beside the special writers of the Draft EIR/EIS. On June 6, 2006 at the Harquahala Valley, Az. Irrigation District Office part of the 2PM workshop proceeded acceptably. However, after one Public attendee requested everyone "sit so that everyone can hear all questions and answers", the workshop had answering statements of "we can only answer questions on items in the Draft EIR/EIS, and that type of answer seemed very unreasonable because folks thought items should have been included in the draft. There were other answers that frustrated Public attendees of that Harquahala workshop such as "the person to answer that question is not here presently, but will arrive about ...". Even though we stayed in the workshop til a little past 5PM, we ended with questions. I had traveled to the workshop with another person I first saw at the Scoping Meeting in Avondale, Az. January 18, 2006. During our return to Phoenix, we were still perplexed about questions unanswered, the SCE representative answering questions or not, and the SCE consultant answering questions.

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Well, here we go!

The Executive Summary of this Draft EIR/EIS horribly fails including critical information to Arizona. The summary is not forthcoming on the hidden partner of this proposal, the Los Angeles Department of Water and Power - see Page B-19 of Volume I. That hidden fact from folks, only receiving the summary, makes this NEPA process very bad if not also unlawful. On June 27, 2006 at the Hearing before the Arizona Power Plant and Transmission Line Siting Committee, the hidden partner issue was presented whether the SCE application of May 1, 2006 filed with the Arizona Corporation Commission was a lawful application, under Az. Law That APP&TLSC Hearing is in “continuance” til August 21, 2006.

C29-2

This last date and the deadline of August 11, 2006 for commenting on the DPV2 Draft EIR/EIS established another issue for Arizonans. Affirmation was received that SCE has already received comments on this Draft EIR/EIS before the comments’ deadline, and would, under the Freedom of Information Act. Many comments for the draft will also be points presented at the Az. hearing against the SCE proposed 500kV Line. Thus the release of comments on the draft conflicts Arizonans in submitting comments because SCE would learn of hearing presentations before the APP&TLSC would, jeopardizing justice and fairness.

Another severe omission from the Executive Summary is the Arizona Public Service’s “TS-5 Project” and its impacts in NE Harquahala Valley in the same corridor as DPV1, the same corridor for the DPV2 preferred route and 2 of the alternatives. See TS-5 in Sections “C” and “F” of this Draft EIR/EIS’s Volume I, and also in Volume III, Appendix 1. The TS-5 Project is assessed 24 times total in the 2 volumes. The APS is in their allowable timeframe for decisions on the already Az.-approved TS-5 Project, and the decision ending date is not until December 31, 2006, and that ending could be extended into 2007, or ...? Why are we even discussing SCE’s DPV2 Proposal at this time when we do not know specific decisions by APS on their TS-5 Project? The Utility Division staff, Arizona Corporation Commission, reports SCE personnel knew of the possible TS-5 Project routes in advance of the Az. hearings on TS-5, and the negative impacts to the DPV2 proposed preferred route and 2 alternatives because the aggregate lines would be in the same corridor from the PVNGS to north of the Interstate I-10 Highway.

C29-3

On Page ES-1 of the Executive Summary in the last paragraph regards a Draft EIS for DPV1 by the Bureau of Land Management and the Nuclear Regulatory Agency in 1978. Some Arizonans commenting on this DPV2 Draft EIR/EIS were involved in the 1977-78 processes on the then proposed DPV1 Line prior to the March 1978 Hearing before the APP&TLSC, and no one from Harquahala Valley, Az. now recalls being contacted by the BLM nor the NRC in those years on a draft EIS. During the current processes the NRC was contacted for verification, and if a draft EIS on DPV1 existed in 1978 it is not in their current records’ system; NRC archives may reveal verification, but NRC personnel asked for a number, perhaps similar the “SCH No.” on the front of these DPV2 Draft EIR/EIS books. If BLM was involved in a draft EIS in 1978, BLM has the number needed, and that number should be documented in this draft’s historical background.

C29-4

Additional historical background missing from the same “last paragraph” regards the APP&TLSC’s March 1978 decision granting SCE the Far-South Harquahala Valley Alternative (1 of the 5 alternatives in H.V.) for DPV1. The ACC later affirmed the APP&TLSC decision, which did not harm the agricultural employment lands nor the residential nor potentially agricultural/residential lands in H.V., Az. A problem with “due diligence” or federal agency denial of that route occurred, and SCE had to abandon that far-south route in 1980. Then, SCE filed with the ACC for the Far-North Alternative in Harquahala Valley, and being the last option in the valley for a DPV1 Line, SCE received approval. The facts of this paragraph in these comments should also be on Page ES-1 of the Summary, and is another example of why the DPV2 proposal’s Draft and Final EIR/EISs should distinguish better differences between Az. and Ca. in SCE’s two-state proposal.

C29-5

On the E.S.’s Page ES-2 it is very unreasonable to fail including the facts that Arizona’s commission

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and siting committee were not respected during 1985-89 by SCE and the BLM in participation on the then DPV2 portions in our State. That is also true about other Az. agencies and the ARIZONA PUBLIC. Please, include this failure with details in the “Proposed Project and Historical Background” section of the Final EIR/EIS on the current DPV2 proposal.

C29-6 cont.

In the Executive Summary on Page ES-2 under purpose and need is a fourfold summary of objectives. Regarding “Increase California’s Transmission Import Capability”, another 500kV line across Arizona is totally unnecessary because SCE fails to use existing lines capably for importing 1,200 more MW. On “Enhance the Competitive Energy Market”, that is “dollars”, and I have been emailed June 21, 2006 by Aspen EG: “the California Environmental Quality Act states that economic effects shall not be considered as significant effects on the environment (CEQA Guidelines 15131)” - we are talking about the “Arizona Environment” here!! About “Support the Energy Market in the Southwest”, SCE is telling Arizonans we need their support when SCE fails to inform Ca. and the BLM that Arizona is “power deficient” - see the 2004 Biennial Report On Transmission Lines on file at the Arizona Corporation Commission Offices, as Az. does not generate enough energy for our own needs and our utilities have to buy from merchants and have to import electricity; with Az.’s growth during 2005-2006, the new biennial report will be bleaker on generation-to-demand. “Provide Increased Reliability, Insurance Value, and Operating Flexibility” does not address/help any specific deficiency of the the Arizona transmission system; SCE opts out of an Alternative Project 49, as the regional system needs north-south improvement, and DPV2 only duplicates what DPV1 does east-west. Having read the CPUC website on SCE, the electrical power is more than abundant for SCE customers into the next decade or longer, and SCE truly does not need 1,200 more MW even though they shut down the Mohave Generating Station where they owned 55% (?) of the power plus managed Mohave’s operations. Even CAISO’s “cost-effective” comment at the bottom of Page ES-2 fails to comply with “CEQA Guidelines 15131”, and is very disrespectful to Arizona and to Arizona being “power deficient”.

C29-7

On Page ES-8 Line 6 of Paragraph 4, “southeast” places the line outside the existing corridor. See also Volume I Page D.2-3, Paragraph 2, Line 6, and possibly other places in this draft’s 3 volumes.

C29-8

The Executive Summary does not address SCE’s importing capability with respect to the Trans-West Express lines and SCE’s lines from the Marketplace Substation. SCE’s proposed DPV2 project is an importing project, and other importing alternatives must be addressed in this EIR/EIS process.

C29-9

Neither the Executive Summary nor the 3 volumes address the Homeland Security environment, and issues since the proposed lines impacts the Palo Verde Nuclear Generating Station.

C29-10

In Volume I Analysis go to “A.2.2 Electric Supply Issues” SCE discusses a so-called power-plant boom. However, regarding the Table A-3 SCE terribly fails to inform the current status of the listed plants: 5 are owned/operated by/contracted to Az. utilities, 3 merchant plants are contracted to Az. utilities, 1 is in some stage of bankruptcy and has not operated for 3 years, and the last was never built. When showing the table to ACC staff, the statement is that all utilities, including SCE, already know the stati of those plants and that table, A-3, is misleading - does not establish a boom, and as a table should never be in a Draft EIR/EIS because the facts are not true. SCE is wronging BLM/CPUC by including Table A-3 in this draft. BLM and CPUC should research the power plant lists at the ACC as I did. In a prior paragraph I have already informed BLM/CPUC that the State of Arizona is “power deficient”, and BLM and CPUC need to read the biennial report at the ACC!!! Seems like the Public is verifying here instead of the BLM/CPUC.

C29-11

Figure A-1 on Page A-11 is horribly distorting with respect to Nevada and Arizona, and maybe Ca. too. A-1 is an unprofessional presentation; why? The North Gila plant is located well east of Yuma, Az. The PVNGS and the Harquahala plant are directionally and geographically not in position, and the westerly lines are not accurate. The Mohave Plant is in Laughlin, Nv. adjacent to the Colorado River. ACC personnel confirmed the Mead Substation is positioned too far north and is closer to Bullhead

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- City, Az. Accuracy is important as I will probably refer other comments to this horrid-map figure. C29-12 cont.
- On Page A-13 begins paragraphs regarding CAISO. BLM knows the “C” stands for California. In any draft involving Arizona, it should be emphasized that CAISO’s wants, decisions, whatever do not mean Arizona realities. It is rude that not to distinguish Arizona from California in the varied parts of this draft, yet in other parts it is distinguishable. In discussing CAISO with ACC staff the exchange did not have positives as some words were cautiously presented. C29-13
- See “A.2.3 Project Need and SCE’s Economic Analysis” on Page A-15. The “Economic” is another violation of CEQA Guidelines 15131 (or more if CEQA has other numbers/guides restricting money issues?). Why is the CPUC allowing “production costs”, “expected economics”, “cost models”, “costs for electric consumers in the CAISO area”, “\$1 billion” etc, etc etc in this draft EIR/EIS which is also for the BLM and NEPA?? We note that the two-state application of DPV2, to Az. and to Ca., thusly does not discuss how much money etc that DPV2 will cost Arizona, Arizona’s utilities, and Arizona’s ratepayers!!!!!! C29-14
- On Page B-9 “B.2.2.1” Tonopah, Az. is the closest unincorporated community to the Harquahala Generating Station. In rural Az. “located near” is different than ...! Just take out an Az. road map, and find Tonopah, Az. and the I-10 Freeway west of Buckeye. Please, note the Wintersburg Rd./I-10 exit is 4.5 miles east of Tonopah. Unincorporated Wintersburg (SE of Tonopah) is approximately 2 miles north of the PVNGS. From Tonopah drive Indian School Rd. 7 miles west to the Salome Hwy. Intersection. Turn right onto Salome to the 491st Ave Intersection. Turn Left on 491st and drive to the Harquahala Generating Station. The total mileage may be 11 miles Tonopah to HGS. The HGS switchyard is approximately 20-21 miles from the PVNGS. May seem a minor comment, but is more accurate if the intent is to explain the HGS switchyard location. At least the HGS switchyard is “northwest of the PVNGS” is accurate instead of what is shown in that horrid Figure A-1 (P.A-11). C29-15
- On Page B-11 only 1 photo of the DPV1 Line is a Kofa National Wildlife Refuge scene, but specifically where in Kofa is the location? What DPV1 Tower Number are we looking at? Who photoed the one scene and when was the photo taken? What other DPV1 tower sites in Kofa should be included in the Final EIR/EIS? At the June 27, 2006 Hearing before the APP&TLSC, SCE showed a photo of the DPV1 Line where Kofa is bladed and scarred for over a mile. Why is that photo not in the Draft EIR/EIS? That scar is in violation of the USFWS’s Permit E-2 to SCE for constructing and maintaining the Kofa National Wildlife Refuge. Why has the BLM failed to see the scar along Pipeline Rd., and not addressed the Kofa scar in this Draft EIR/EIS? Where is the DPV1 Line photo in Harquahala Valley at the intersection of Salome Hwy and Court House Rd? Across Salome Hwy., and Ave 75E in La Paz County, both north of I-10? Others?? The Draft EIR/EIS is very incomplete with respect to the refuge!! C29-16
- Then there is Page B-19 on the Los Angeles Department of Water and Power. I have already commented that this utility, a partner of the DPV2 proposal, was “hidden” from folks, organizations and agencies who/which only received the Executive Summary of the Draft EIR/EIS - that is very, very wrong and unprofessional of the BLM and the CPUC!! “B-19” data is insufficient as Arizonans need more on the LADWP and the contractual agreement et al, and more should be in the Final EIR/EIS. C29-17
- Page B-20 discusses the Arizona Public Service TS-5 Project some. This was also “hidden” from those receiving only the draft’s Executive Summary. The TS-5 may be in Harquahala Valley as APS is yet in the processes of decisions. Seems that the DPV2 applications are too early with respect to TS-5. Discussions on SCE’s motivations for filing DPV2 early in Az. and in Ca. with respect to TS-5 are not positive. The Final EIR/EIS must include the TS-5 Project, and impacts whether any part of DPV2 is viable. C29-18
- On Page C-3, “C.2.1.2”, “Increase California Transmission Import Capability”, SCE falsely states “The Southwest region currently has over 6,000 MW of surplus generation”. Using “Southwest” is very wrong because only Arizona is the second state in which the application is filed. Where are the 3rd and/or the 4th SW States? Further, Arizona does not have “over 6,000 MW of surplus generation”. Go to the offices of the Arizona Corporation Commission and read the 2004 Biennial Transmission Report. Learn that Az. is C29-19

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“power deficient”, meaning our utilities and merchant plants combined are not producing enough electricity to meet Az. needs. Az. also has to import electric power. The report is not accurate either as some plants are not generating; thus those plants’ potential (generation) numbers must be removed from this Draft EIR/EIS to meet reality. Az. does not have electric reserves sufficient per ACC requirements until Az. utilities purchase enough import electricity. The ACC staff states SCE knows the report, and for SCE to state to the BLM and the CPUC surplus generation exists in Az. makes SCE “a four-letter word”!!

C29-20

On Page C-8 “C.3.2 Alternatives Eliminated from Full Consideration in the EIR/EIS” includes the “Path 49 Upgrade Project”. The grid part, north-south, along the Colorado River between Az. and Ca. needs improvement, but SCE does not want to participate in north-south upgrades. How sad for folks/businesses in their own service area along the river. DPV2 will not help Az.’s part of the grid north-south. DPV2 is a “taker” line duplicating DPV1 in the grid east-west. DPV1 is capable of carrying double MWs it does now, and no analysis of that alternative is presented in this Draft EIR/EIS. Why?

C29-21

Beginning on Page C-17 “C.4 Alternatives Evaluated in this EIR/EIS” is terribly incomplete because SCE is not presenting to the BLM and the CPUC the more than abundant “import capabilities” existing to SCE in Az. The preferred route and all presented alternatives of this DPV2 proposal are completely unnecessary because of the more-than-abundant, existing “import capabilities” SCE already has from Az. to Ca..

C29-22

I propose the following “importing” alternatives be added to the EIR/EIS on DPV2:
(please, refer to Page A-11 even though the draft’s map is terribly flawed)

- #1 - SCE and Arizona’s Salt River Project are/were partners of the Mohave Generating Station near Laughlin, Nevada. Each utility has existing 500kV transmission capability from Mohave to their respective service areas. Mohave is shut down completely. SCE can import additional MW from the PVNGS hub to Ca. using SRP’s lines via the Mead Substation to the Marketplace Substation, and then SCE’s own lines to their own service area.
- #2 - SCE’s importing capacity needs to be assessed with respect to electricity by the western grid’s “Trans West Express” Lines bringing power out of Utah through Nevada to Marketplace and/or Mead to Marketplace, and then to SCE’s own transmission lines to Ca. The Trans West Express Project will enhance the grid substantially.
- #3 - SCE has an existing 500kV line across N. Az. from the Four Corners Power Plant. Importing from the PVNGS hub via SRP’s Perkins Substation, SCE importing transmissions will travel on the same line as if going to Mead, but only to a new switchyard where the SCE “N. Az.” Line meets the line going to Mead, and then redirecting the importing electricity west from the new switchyard via SCE’s own line to their service area. The grid in Arizona will be enhanced. It is recommended that SRP be the owner/operator of the new switchyard.
- #4 - SCE also has additional importing capability using DPV1. SCE ramps up the transmission capacity appropriately for carrying additional imported MW to Ca. DPV1 should be converted away from its taker-line status in Az. via a new switchyard when the Path 49 Upgrade Project is constructed. The new switchyard will be operated by APS and/or SRP as “49” enhances the grid

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from Yuma, Az. to Parker, Az, if not farther both north and/or south.

#5 - Of the above proposed alternatives the "#1" alternative is available now as is "#4", but without the switchyard until "49" is constructed. SCE's desire for 1,200 more MW by 2009 will be met by "#1" and "4". Alternative "#3" could also be ready by 2009. Subsequently, the east-west lines can share the need for SCE's need of 1,200 additional MW, which those routes can have higher-MW operations to balance out the "western grid's" total MW at the Colorado River.

Advantages of the above proposed alternatives over the SCE-presented DPV2 preferred route in Az. and all the SCE-presented alternatives in Az.:

#1 - Since SCE has talked dollars in this process, SCE would save millions and millions of dollars by not building the Az. part of DPV2.

#2 - SCE would not have to rip into the Az. environment again from the Colorado River to the PVNGS, especially the environmentally damaging the Kofa National Wildlife Refuge more, which is already SCE scarred and scraped from DPV1 construction and maintenance.

Because of the above proposed alternatives to DPV2 and the advantages of the new proposed alternatives over the Az. part of the whole DPV2 proposal, The FINAL EIR/EIS SHOULD BE A DENIAL TO SCE ON BUILDING ANY DPV2 IN ARIZONA.

On Page C-40 The Cibola National Wildlife is mentioned. The DPV1 avoids the refuge, but it does not avoid the undeveloped recreational area folks use on the eastern banks of the Colorado River between the refuge and Ehrenberg, Az. Viewing DPV1 and DPV2 lines would not enhance recreational outings.

Again SCE is talking dollars on Page C-54 beginning with "The economics ..." of the first paragraph. Again another SCE violation of CEQA Guidelines is in this draft - ??

On Page D.2.2 the Arizona paragraph of "Biological Reconnaissance Surveys" informs of "aerial maps". Those aerial photos are not included in the section. How can any person, organization or agency assess the accuracy of what is in this draft? The Appendix 10 of Part III in this Draft EIR/EIS are not the aerial evidences we should be looking at. My comments on Appendix 10 is separate and later in these Comments. Aerial photographs would show the scarring that was done by SCE during construction of DPV1 and afterwards in the Kofa National Wildlife Refuge. Additionally SCE's 23 years of maintenance on the Pipeline Rd. in Kofa, and the associated spur roads to the transmission towers, cause the elongated area through the refuge to be "unnatural". When a road is permitted in a refuge, only very limited maintenance is permitted so that the habitat vegetation can grow back. SCE's damagings have not allowed the regrowth of the Kofa vegetations adequately on/along the Pipeline Rd. and the spur roads.

Page D.3-6 begins "D.3.2 Environmental Setting for the Proposed Project - Dever-Harquahala". Notably missing from "D.3.2.1 Harquahala to Kofa National Wildlife Refuge" are viewpoints, "Salome Hwy and Thomas Rd." and "Salome Hwy and Courthouse Rd." Others roads with DPV1 should be included.

NOTED WITH EMPAHSIS ON PAGE D.3-39 IS THE U.S. FISH AND WILDLIFE SERVICE'S DETERMINATION THAT SCE'S DPV2 PROPOSAL DOES NOT MEET THE "PRESERVATION OF WILDERNESS VALUES" FOR THE KOFA NATIONAL WILDLIFE REFUGE. SCE has already harmed the Kofa Refuge. The Kofa Refuge, with its inhabitants and plants, does not need DPV2 at all.

C29-22 cont.

C29-23

C29-24

C29-25

C29-26

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On Page D.3-41 in the Method of Consistency column, why are northbound views along Salome Hwy. not also adversely impacted? Court House Rd. views approaching Salome Hwy. will severely be impacted also. DPV2 being 1 of 3 or 4 500kV lines (DPV1, TS-5 and Harquahala-Hassayampa) along Salome Hwy. in Harquahala Valley, nature viewings and sights just while traveling will be badly affected.

C29-28

Thus "D.3.5.4 Impacts Identified" starting on Page D.3-58 is incomplete, and inclusions will be additionally, very significant impacts of the proposed DPV2 Project..

Beginning on Page D.3-65 are photosimulations. THERE ARE NO PHOTOSIMULATIONS OF THE VARIED VIEWS IN THE COURTHOUSE RD.-SALOME HWY. LOCALE, AND NONE FOR THE SALOME HWY.-THOMAS RD. AREA. ALSO, THERE ARE NO SIMULATIONS OF 2 AND/OR 3 LINES WHERE THE ROUTE INTERSECTS I-10, COMING FROM THE EAST, BEFORE THE HIGHWAY ENTERS HARQUAHALA VALLEY AS THE 500kV LINES HEAD NORTH TOWARD BURN MOUNTAIN. What about simulations where the route crosses the Salome Rd. north of I-10 and for the crossing of Avenue 75E north of I-10 in eastern La Paz County? IN THE KOFA NATIONAL WILDLIFE REFUGE, 1 SIMULATION IS INSUFFICIENT!! When driving Pipeline Rd. in Kofa there are numerous viewpoints, and they are not considered in this Draft EIR/EIS. During July and August I have not traveled the Copper Bottom Pass and some other road areas of western La Paz County, but I did travel the Cibola Rd. along the Colorado River on the way to the Cibola National Wildlife Refuge. The recreational users of the undeveloped recreational area along the Cibola Rd. will not like DPV2's impactings. On Page D.3-89, if the photosimulation is "to the southwest", then a simulation view to the northwest (toward Az.) should be included in this draft, and the leftside of the D.3-89 simulation is not encouraging. If the Harquahala Junction Alternative would be a reality, what would the Salome Hwy.-Thomas Rd. locale look like with the switchyard in a photosimulation?

C29-29

"I. Public Participation" begins on Page I-1. The Scoping Process for a possible EIR/EIS on SCE's DPV2 Application in Arizona has been, remains yet, extremely poor. The BLM and the CPUC noticed at very best 1.5-2.0% of Arizonans who should have been noticed. A claim was made at the meeting in Avondale, Az. on January 18, 2006 that maybe 4,000 notices were sent to Arizonans, but no evidence was presented. Even if that many notices were sent, no evidence establish has been presented that millions of Arizona ratepayers have been noticed. Advertising in a few papers, when only 12 days advance was given (?), in Az. was certainly very inadequate noticing because a high percentage of Arizonans are not subscribers to those few papers. By luck I learned about the Avondale meeting. At that meeting while learning about the extremely poor effort to notify Arizonans, the BLM and the CPUC thus created a negative atmosphere. How sad!! For the millions of Arizona business and residential ratepayers, they were never noticed properly and will be the victims of deliberate omissions; additionally, they will be adversely impacted as their electric bills will increase if SCE's proposal is approved.

C29-30

Since the Draft EIR/EIS "Informational Workshop" in Harquahala Valley, Az. was lacking answers to the attendees, consistent with the draft itself, THERE SHOULD BE NO FINAL EIR/EIS, NO APPROVAL OF SCE'S DPV2 PROPOSAL ON THE ARIZONA PART OF THE LINE..

In Volume 3, "Appendices", of this Draft EIR/EIS beginning on Page Ap.1-13, the "3. Overview of Alternatives" is inadequate because no separate-of-DPV1-route alternate "importing proposals" are detailed. In Az. from the Colorado River to the Harquahala Valley, there are no alternatives period!! In 1978 the Arizona Corporation Commission affirmed the decision of the Arizona Power Plant and Transmission Line Siting Committee that DPV1 would not harm the agricultural employment lands in Harquahala Valley nor residential nor other "potential"; that affirmation included the preferred route and 3 alternate routes through H.V. Now the application from SCE has been changed from DPV2 to be Devers-Harquahala Generating Station or Devers-Harquahala. The alignment of the DPV2 preferred route is along Thomas Rd. in Harquahala Valley. The DPV2 Alternate called "Harquahala West" is in the same Thomas Rd. alignment. In 1978 the ACC and the APP&TLSC said "NO!!" to SCE on the Thomas Rd. alignment. Yet this Draft EIR/EIS does not inform everybody of that Arizona history on the DPV1 application. Thus this "Overview" fails to be inclusive of viable, individual importing alternatives, and also fails to

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be respectful of Arizona, Arizonans and the history in Az. of the D-PV corridor in Harquahala Valley. **C29-31 cont.**

On Page Ap.1-37 so-called configurations are distortions. The Arlington, Mesquite and Redhawk Merchant Plants are not southwest, south nor southeast of the Hassayampa Switchyard. Further, the TS-5 Project from Harquahala Junction is parallel to DPV1/proposed DPV2 in the same corridor north to and across the I-10 Interstate Hwy. Is it so difficult for the BLM/the CPUC to accurately diagram in this draft EIR/EIS? **C29-32**

Regarding "Appendix 3 Tower Height Tables" beginning on Page Ap.3-1, not one tower from the Colorado River to the PVNGS can be identified. You ask for comments from the Public in Arizona. However, the BLM/the CPUC must provide the Public concise and understandable data. During June, July and August I have visited numerous towers of DPV1, and there is no evidence that these Tower Height Tables identify any tower in Arizona. DPV2 tower heights can also not be identified by the tables. **C29-33**

Regarding Appendix 10, I can not find page numbers for the aerial photographs. I have asked BLM/CPUC for the date(s) the aerial photos were taken, and for the altitudes at which each photo was taken. TO THIS DATE OF AUGUST 11, 2006, after well over 6 weeks since my request, NO ANSWERS HAVE BEEN FORTHCOMING FROM THE BLM/THE CPUC - ?? From recollections of events regarding DPV1 prior to APP&TLSC's March, 1978 Hearing, Appendix 10 photographs No. 1 to No.17 in Arizona are the same aerial photos displayed by SCE in 1977-78. Devers-Palo Verde No.1 500kV Line was completed in 1983. OF WHAT VALUE ARE APPENDIX 10 PHOTOS WITHOUT LAND CHANGES SINCE 1978? **C29-34**

Again on Appendix 10, the tower numbers for DPV1 on the aerial maps are not the correct numbers for any of the towers that I visited during July nor this month. Through the Kofa National Wildlife Refuge sheets Nos. 10 and 12 show that SCE has built parts of DPV1 in the wilderness area of Kofa rather than in the permitted corridor - ?? When will the BLM enforce the requirements for DPV1? Or USFWS? **C29-35**

Enclosed with these comment pages on the Draft EIR/EIS on the proposed SCE DPV2 line are a set of photographs. Some photos will show BLM/CPUC correct numbers of DPV1 Towers, and on the backsides are descriptive locations of the towers. Thus for the Final EIR/EIS BLM/CPUC can redo the tower numberings for the towers in Az. SCE should have provided the BLM/CPUC with the true tower numbers because they placed the numbers on the towers. There are 8 photos of the enclosed set with showing correct tower numbers.

Remaining photos of the set try to show views with respect to DPV1 towers. Because of bright sunlight and of some clouds, some photos from the flash-camera do not represent the same effects as folks would receive using their own eyes. Twenty (20) of the photos are associated with the Kofa National Wildlife Refuge, and 8 photos are associated with Salome Hwy. in Harquahala Valley, Az. in the areas of Thomas Rd. and Court House Rd. Intersections. What will photosimulations look like at the respect points across Kofa and H.V. with 2, 3 or 4 500kv lines respectively? **C29-36**

I have waited for additional replies from agencies and other sources, but today is August 11, 2006 and the comments' deadline is today. Thus, what the BLM and the CPUC receive from these comment pages might be all presented for the Final EIR/EIS on the SCE DPV2 proposal. If anything critical is received, will mail addendum comment(s).

For pages of this Draft EIR/EIS not commented on, may other persons and/or organizations be assessing and commenting. Otherwise, much fine work has occurred on the many, many other pages of this draft.

Donald G. Begalke
Telephone: (602)279-3402



copy - file/others
enclosures: packet of 28 photographs

EMAIL: LASERHARQUAHALA@YAHOO.COM

Comment Set C29, cont.
Donald G. Begalke

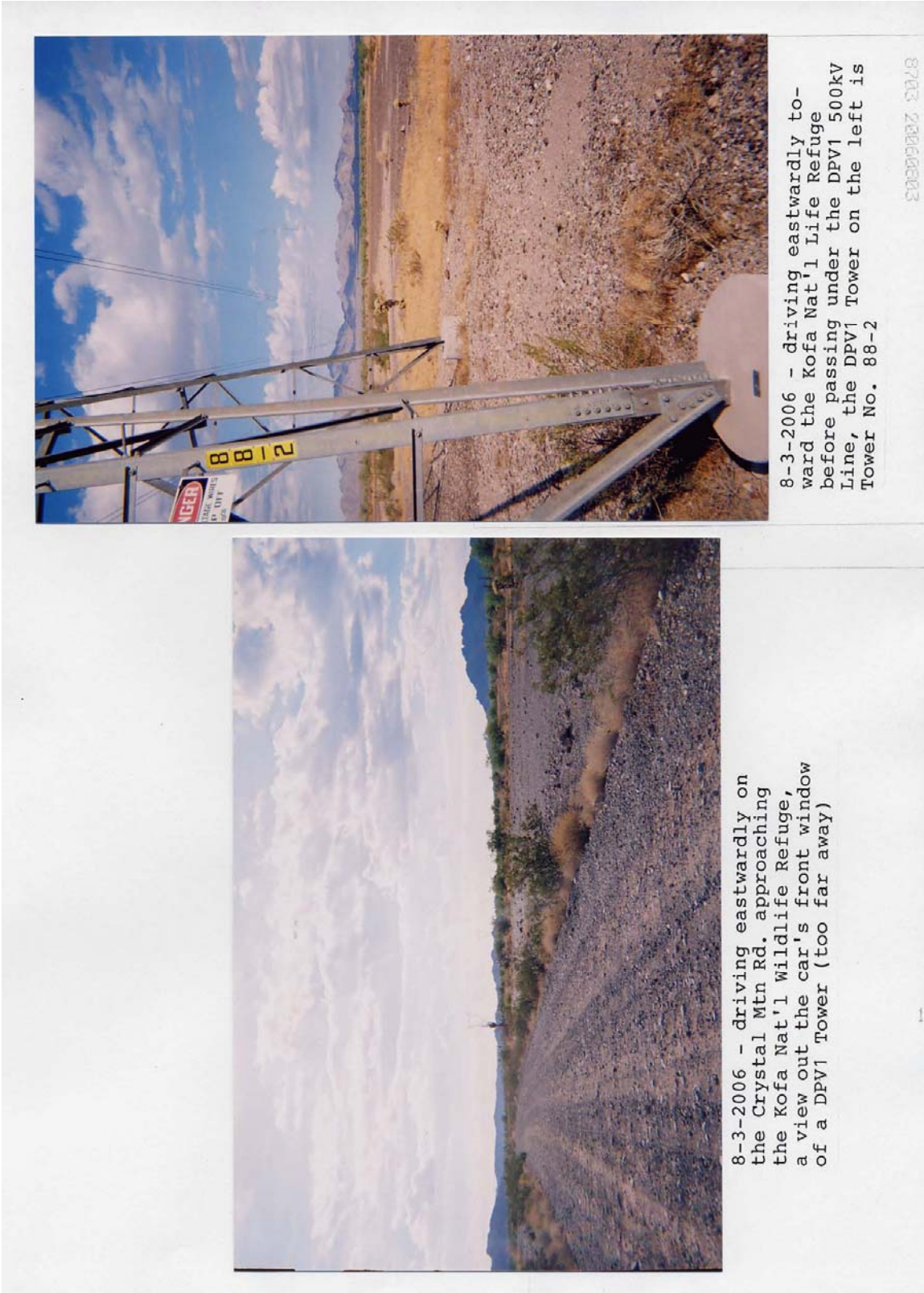


8-3-2006 - driving south on Rt. US95 in Az., a view eastwardly of DVP1 Towers impedes viewing of the Kofa Mtns.



8-3-2006 - the DVP1 Tower, the first, west of US95 in Az. is Tower No. 90-2

Comment Set C29, cont.
Donald G. Begalke



Comment Set C29, cont.
Donald G. Begalke



(No. 1593)
8-3-2006 - DPV1 Tower is numbered No. 88-1; the tower is located east of the Crystal Mtn. Rd. approaching the Kofa Nat'l Wildlife Refuge, Az.
8703 20060903



8-3-2006 - after passing under the DPV1 500kV Line driving eastwardly on the Crystal Mtn Rd., Tower No. 88-1 blocks viewing of part of the Kofa Mtns.

Comment Set C29, cont.
Donald G. Begalke



7-19-2006 - signage at the western entrance to the Kofa Nat'l Wildlife Refuge, Az.



7-19-2006 - from nearby the Kofa western entrance along Crystal Mtn Rd., a view of DPV1 towers and the Kofa Mtns adistant.

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - driving eastwardly on Pipeline Rd. in the Kofa Refuge, a forward view with DPV1 towers on the left and ahead. (taken too far away)



8-3-2006 - another eastwardly view from Pipeline Rd. in the Kofa Refuge, Az. with DPV1 towers on the right and ahead. (lighting and whitetish clouds a problem)

Comment Set C29, cont.
Donald G. Begalke



8703

8-3-2006 - a rightside view of the Kofa Mtns in the Kofa Refuge with a DPV1 tower. From Pipeline Rd.



8-3-2006 - Tower No. 83-3 of the DPV1 500kV Line in the Kofa Nat'l Wildlife Refuge, Az. off the Pipeline Rd.

8703 20060803

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - an eastwardly view of the manmade scarring along the Pipeline Rd. in the Kofa Nat'l Wildlife Refuge, Az. as the road approaches a mesa.



8-3-2006 -DPV1 Tower No. 78-1 off Pipeline Rd. in the Kofa Nat'l Wildlife Refuge, Az. near the western end of the manmade scarring.

Comment Set C29, cont.
Donald G. Begalke



7-19-2006 - Mr. Jon Findley, Chair of Sierra Club's Energy Committee & from the BLM-CPUC Scoping Meeting, Avondale, Az., overlooking DPV₂ tower from mesa in Kofa Ref.



7-19-2006 - from an elevated mesa in the Kofa Nat'l Wildlife Refuge, a westerly view of the scarring along Pipeline Rd. w/transmission

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - DPV1 Tower No. 74-1 on the northerly side of Pipeline Rd. in the Kofa Nat'l Wildlife Refuge, Az. looking toward Tower No. 74-2 southerly of the road.

DPV1 20060803

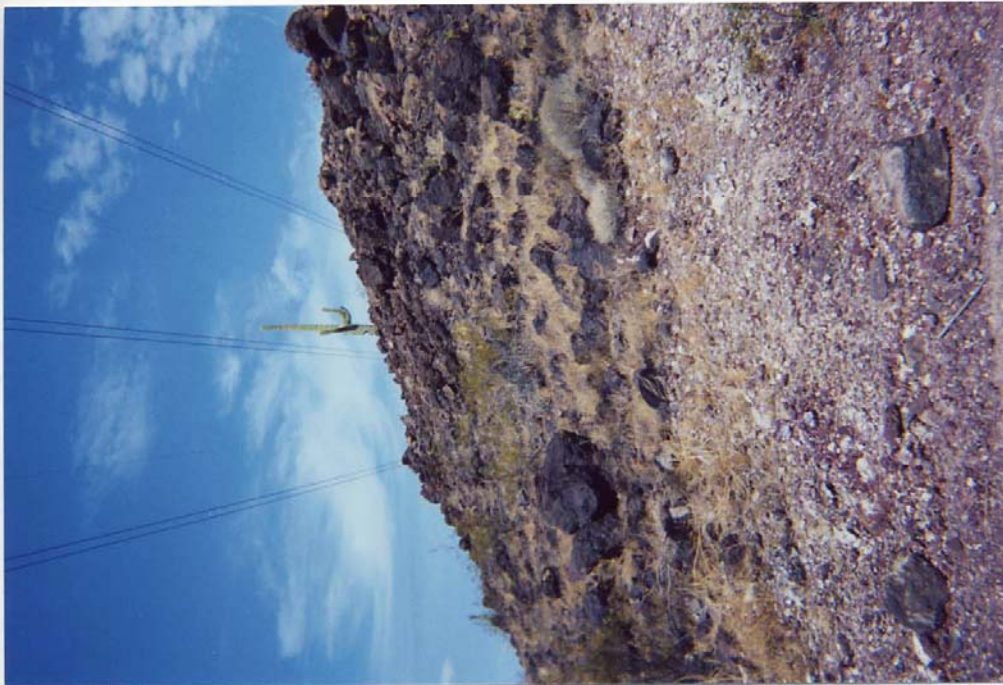


8-3-2006 - by Pipeline Rd. in the Kofa Nat'l Wildlife Refuge (near DPV1 Tower No. 74-1 looking uphill westwardly, a view of DPV1 Towers toward the pass)

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - DPV1 Tower No. 62-1 is the first DPV1 tower outside the eastern boundary of the Kofa Nat'l Wildlife Refuge on the left side (north) driving Pipeline Rd. east.



7-19-2006 - DPV1 transmission lines seeming low at the top of a knoll in the Kofa Wildlife Refuge, Az.; DPV1 Towers No. 73-3 (behind) and 74-1 forward.

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - driving southeastwardly on Salome Hwy. in Harquahala Vly., Az. approaching Thomas Rd., a view of the DPV1 and Harquahala-Hassayampa 500kV Lines.



8-3-2006 - driving Salome ^{Hwy} Rd. toward the Courthouse Rd. Intersection in Harquahala Vly, Az, a view of DPV1 & Harquahala-Hassayampa 500kV Lines, both left of the hwy.

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - Harquahala-Hassayampa
500kV Line Tower No. 5-2 adjacent
to DPV1 Tower No. 14-1 Tower off
Salome Hwy. in Harquahala Vly., Az.



8-3-2006-DPV1 Tower No. 14-1, the
first tower on the right side of
Salome Hwy., N. of Intersection
w/Courthouse Rd., Harquahala Vly.,
Az; tower very close/adjacent #5-2

TOWER
of the Harquahala-Hassayampa
500kV Transmission Line

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 ^{from} Courthouse Rd, view ^{SE} near Salome Hwy. Intersection northwest-erly at DPV1 and Harquahala-Hassayampa adjacent 500kV Lines, H.V.



8-3-2006 - from Courthouse Rd. in Harquahala Valley, Az. near the Salome Hwy. Intersection, view of DPV1 & Harq.-Hassayampa 500kV Transmission Lines.

Comment Set C29, cont.
Donald G. Begalke



8-3-2006 - Salome Rd. view looking NW (before Courthouse Rd. Intrsctn at the DPV1 & Harq. Hassayampa adjacent 500kV Lines in Harquahala Valley, Az.



8-3-2006 - driving westerly on Salome Hwy before reaching Harquahala Vly, DPV1 & Harq.-Hassayampa 500kV Towers southeast of the Intersection with Courthouse Rd.

Responses to Comment Set C29

Donald G. Begalke

C29-1 Section I in the EIR/EIS discusses the public involvement and notification process used during the CEQA and NEPA process. As stated in the Notice of Availability for the Draft EIR/EIS, the entire text of the Draft EIR/EIS was made available at 26 public repositories, on the CPUC and BLM project websites, and to anyone who requested a copy.

The CPUC has jurisdiction over transmission line in California, and the BLM has jurisdiction on all federal BLM lands, in both California and Arizona. In addition, see Section A.3.3 for a discussion of the separate Arizona Corporation Commission approval process.

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

U.S. Fish and Wildlife Service is a cooperating agency in the NEPA process and has provided comments on the Draft EIR/EIS (see Comment Set A18). As stated in Section A.3.5 in Table A-4, the following USFWS permits would be required: Certificate of Environmental Compatibility for the Kofa NWR; Right-of-Way Grant (crossing Kofa NWR and Coachella Valley NWR); Consultation for Section 7 of the Endangered Species Act; and Habitat Conservation Plans (Riverside County).

Please refer to Section 3.1 (Information Provided During Draft EIR/EIS Comment Period) of this Final EIR/EIS for questions from the commenter and responses provided by the EIR/EIS team during the comment period.

C29-2 As stated in the Notice of Availability, the entire text of the Draft EIR/EIS is available at 26 public repositories, on the CPUC and BLM project websites, and to anyone who requests a copy. By definition, the Executive Summary of the EIR/EIS is an abbreviated summary of project impacts. It is intended to briefly summarize key issues, but it cannot present every issue contained in the EIR/EIS.

The goal of the EIR/EIS is to disclose the environmental impacts of the proposed DPV2 Project. The status of participation of the LADWP is described in Section B.2.4 of the Draft EIR/EIS, but this agreement has no bearing on project impacts. Although LADWP would be required to acquire 30.7 percent ownership interest in DPV2, the application and construction of DPV2 is proposed by SCE. LADWP has not yet committed to participate in DPV2 and some issues still need to be resolved between LADWP and the CAISO so that SCE can construct the DPV2 project as proposed.

The ACC process is independent of the CPUC and BLM proceedings (Certificate of Public Convenience and Necessity/Right of Way Grant, respectively) to evaluate applications from SCE for the DPV2 Project. The environmental information included in the EIR/EIS may be useful to the Siting Committee or SCE in that proceeding, but this document was not prepared for that purpose. Please also see Section 3.1 (Information Provided During Draft EIR/EIS Comment Period) of this Final EIR/EIS for questions by the commenter regarding the release of comments during the comment period.

Comments on the Draft EIR/EIS are considered to be public, and are provided to any party requesting copies of them. While SCE would be able to read comments prior to the ACC hearings, other parties would also be able to read SCE comments.

C29-3 The Arizona Public Service TS-5 Project, as discussed in Section B.2.4 of the Draft EIR/EIS, is an independent project submitted by APS and the approval of the APS project does not affect DPV2. However, the TS-5 Project was included in Table F-1 (DPV2 Cumulative Project List) in Section F.2 of the Draft EIR/EIS and was evaluated by all 13 issue areas as a reasonably foreseeable project in the cumulative scenario [see Figure F-1a (Cumulative Projects in Maricopa) and Section F.3]. The EIR/EIS describes the status of the TS-5 Project, but questions regarding this status of the TS-5 Project would more appropriately be submitted to the ACC.

C29-4 EIR/EIS preparers were not involved in preparation of the original EIS for DPV1 and have no information on the public involvement process completed during preparation of that document. Section A.1.3 of the Draft EIR/EIS lists past documents in the project area. The Draft EIS was published in August 1978 and the Final EIS was published in February 1979. Both the Arizona and California State Clearinghouses were involved in the process. We have not found a docket/application number, but the number for the associated NRC PVNGS Final Environmental Statement is NUREG 75/078.

C29-5 Section ES.1 is intended to be a brief background overview of the project. The decision of which DPV1 route was ultimately approved, and the process used for its approval, does not affect the environmental setting or impacts of the currently proposed DPV2 Project. Alternatives to the Proposed Project were fully considered in the EIR/EIS, regardless of the actions taken in the previous approval process.

C29-6 Section ES.1 is intended to be a brief background on the project and it does not affect the baseline setting or impacts of the Proposed Project. Regardless, page ES-2 has been modified as follows:

The BLM approved the DPV2 project and the proposed route following completion of a Final Supplemental EIS (BLM, 1988) in compliance with NEPA, which included the route in Arizona, and issued a Record of Decision in 1989.

C29-7 Please refer to General Response GR-2 and GR-3 for a discussion of benefits to Arizona and project need. The CPUC Administrative Law Judge is evaluating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporations Commission in a separate proceeding will also be addressing project need. See also Response B3-4 regarding project economics.

C29-8 Executive Summary Section ES.1.2.4 (page ES-8, paragraph 2, line 6) of the Draft EIR/EIS has been modified as follows:

The route would then turn southeast-southwest crossing over I-10 again, and would continue across the Harquahala Plain through the northern end of the Eagletail Mountains until it would enter into La Paz County.

In addition, page D.2-3 (paragraph 2, line 6) has been revised as follows:

The route would then turn ~~southeast-southwest~~ crossing over I-10 again, and would continue across the Harquahala Plain through the northern end of the Eagletail Mountains until it would enter into La Paz County.

C29-9 The Trans-West Express line is in the early planning and development stages, and is considered to be speculative at this time. Currently, it is not scheduled to be online until 2013 (after the 2009 online date for DPV2). The exact route is still uncertain (the current proposal would be a high voltage direct current line from eastern Wyoming, south through Colorado or Utah, with the endpoint in the Phoenix area). The goal of this project would be to provide additional electricity capacity in the Phoenix area. The Trans-West line is uncertain at this time, and cannot be considered as an alternative to DPV2.

Marketplace Substation is located in southern Nevada. Based on regional transmission maps, the EIR/EIS team is unaware of SCE having any transmission lines out of Marketplace Substation. The only transmission line out of Marketplace Substation is the LADWP/Western Area Power Administration Marketplace-Adelanto 500 kV line.

One importing capability option would be to increase capacity on Moenkopi–El Dorado 500 kV line, but both SCE and the CAISO in the Southwest Transmission Expansion Plan (STEP) process have stated that this upgrade project would be an option as a project to be considered in the future to provide an incremental increase in the import capabilities, but it could not replace the 1,200 MW that SCE would receive with DPV2.

C29-10 Please refer to the responses to Comment Set A16 regarding consideration of terrorism as an impact. The operation of the Palo Verde Nuclear Generating Station (PVNGS) would not change with implementation of the DPV2 Project. In addition, the Proposed Project route would terminate at the Harquahala Switchyard, approximately 14 miles northwest of PVNGS.

C29-11 The ACC will have to consider the sufficiency of electric resources to adequately serve Arizona in the future. It is outside the scope of CEQA and NEPA to project the balance of load and resources into the future and as to whether there is future capacity in Arizona to be transported across the DPV2 line. Section A.2.2 is designed to give a reader an overall picture of electricity supply issues in the project area, and it is not intended to list all the power plants that SCE could contract with for purchase of electricity. Regardless, the section title has been changed to the following:

~~Power Plant Construction Boom in Arizona~~ Generation Resources in the Palo Verde (AZ) Area

C29-12 Figure A-1 (Regional Transmission System) is a typical transmission system diagram. It is not intended to show exact geographical location, but rather it is designed to show schematically how the regional transmission system is interconnected. In transmission system figures, substations and power plants may be moved slightly to allow for improved readability of the transmission lines and interconnections.

C29-13 The CPUC and BLM are fully aware that the DPV2 project must also be approved by the Arizona Corporation Commission. EIR/EIS Section A.3.3 (Arizona Corporation Commission Process) clearly describes the ACC process and states that the ACC in a separate proceeding will be addressing project need and impacts in Arizona.

C29-14 The economic modeling by SCE includes the entire project in both California and Arizona. Please refer to General Responses GR-2 and GR-3 for a discussion of benefits to Arizona and project need, which are discussed in the EIR/EIS for informational purposes but are not required as part of the environmental impact analysis under CEQA and NEPA. In addition to the CPUC’s responsibility to identify project impacts, it must also determine project need and effects on SCE ratepayers in a separate and independent proceeding. The CPUC Administrative Law Judge is evaluating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporations Commission in a separate proceeding will also be addressing project need. See also Response B3-4 regarding economics.

C29-15 Figure B-1 (Devers-Harquahala Portion: Harquahala to Colorado River Map) correctly depicts Tonopah as being approximately 11 miles east-northeast of Harquahala Generating Station and approximately 17 miles from PVNGS (as also stated in the text in Section B.2.2.1). Please refer to Response C29-12 regarding Figure A-1. Regardless, the text in Section B.2.2.1 of the Draft EIR/EIS has been modified as follows:

The Arizona portion of the Proposed Project would consist of 102 miles of 500 kV transmission line between the Harquahala Generating Station switchyard (located near Wintersburg and approximately 11 miles west-southwest of Tonopah, Maricopa County, approximately 17 miles northwest of the PVNGS) to the Colorado River, as illustrated in Figure B 1.

C29-16 SCE’s application to the ACC and the ACC hearings are independent of the EIR/EIS; events at ACC hearings are not part of the NEPA/CEQA process. The photograph of the DPV1 tower presented on page B-11 is intended only to give the reader a general idea of the terrain and setting of the area in Kofa NWR.

The scar existing along Pipeline Road apparently results from the construction of natural gas pipelines through the Kofa NWR. Pipeline construction creates much more extensive ground disturbance than transmission lines, and leaves more obvious scars. However, Pipeline Road has provided an access road for construction of both utility types through the Refuge. If SCE’s actions to blade roads within Kofa are in violation of its permits, Refuge management (not BLM) will address this issue with SCE. See Comment Set A19 from the U.S. Fish and Wildlife Service.

It is not feasible to photograph and create simulations of every location along a linear project like DPV2, so locations are selected to represent views of each area. The visual resources analysis of the DPV2 project is presented in Sections D.3.2.1 and D.3.6.1. For the Proposed Project, three key viewpoints were selected for detailed analysis along the Harquahala to Kofa route segment. Existing conditions photographs and visual simulations for these three key viewpoints are presented as Figure D.3-2A/2B for the area north of I-10 near the Big Horn Mountains, Figure D.3-3A/3B for the I-10 crossing, and Figure D.3-4A/4B for the area north of the Eagletail Mountains. Within Kofa NWR (see Section D.3.2.2), Key Viewpoint 4 was established on Crystal Hill Road in the Refuge, approximately 4.8 miles east of U.S. 95 (see Figure D.3-5A). Viewing to the southeast toward the existing DPV1 line (Towers A740 through A743) and the proposed route, this location was selected to characterize the existing landscape along the route within Kofa NWR.

In Section D.3.2.3 for the area from Kofa National Wildlife Refuge to Colorado River, three areas of potential visual sensitivity were selected for detailed analysis: (1) the crossing of U.S. 95 as viewed from the highway, (2) views in the vicinity of Copper Bottom Pass, an area popular with back country recreationists, and (3) views from the Colorado River. Therefore, three KVPs were selected to represent the visual setting along this route segment. The location of each of these KVPs is shown on Figure D.3-1B. The results of the visual analysis are summarized in Appendix VR-1. These seven Key Viewpoints within Arizona, including one within Kofa NWR, represent the visual setting along the route and give a comprehensive view of the ROW and the DPV1 500 kV transmission line.

C29-17 Please refer to Response C29-2.

C29-18 Please refer to Response C29-3.

C29-19 The EIR/EIS team is aware that there are concerns by Arizona citizens as to the sufficiency of resources in the future; this issue must be addressed by the ACC in its process. It is outside the scope of CEQA and NEPA to project the balance of load and resources into the future and as to whether there is future capacity in Arizona to be transported across the circuit. The transmission grid and system extends beyond state boundaries and substation endpoints and therefore the project could affect the southwest region beyond California and Arizona. Please refer to Response C29-11.

C29-20 Please refer to C29-19.

C29-21 As stated in Section 3.2.1.5 in Appendix 1 of the Draft EIR/EIS, the Path 49 Upgrade Project as defined in the PEA does not qualify as an alternative to the proposed DPV2 project because some of the upgrades have already been implemented. The additional 505 MW capacity provided by the Path 49 Upgrade Project was considered by SCE and CAISO to be part of the system that exists as the baseline for measuring economic benefits derived from the addition of 1,200 MW capacity that would occur with DPV2. It means that DPV2 would provide 1,200 MW in addition to, not as a substitute to, the 505 MW provided by the Path 49 Upgrade Project. Because the upgrades have already occurred is the reason that the alternative was eliminated from further consideration as an alternative to the Proposed Project during the screening process.

C29-22 Please refer to Response C29-12 regarding Figure A-1. Please refer to Response B6-5 discussing how the EIR/EIS analyzed a “reasonable range of alternatives.” The suggestions made in this comment involve large regional projects and are beyond the scope of the analysis completed in this EIR/EIS.

C29-23 As discussed in Section 4.2.8 of Appendix 1 (see also Section C.5.2.5) of the Draft EIR/EIS, the SCE South of Blythe Alternative (which would have affected the Cibola National Wildlife Refuge) was eliminated from full consideration in the EIR/EIS due to much greater visual, land use, biological resources, recreation, and cultural resources impacts than the Proposed Project (including in the Cibola NWR).

The DPV2 crossing of the Colorado River would occur at the same location as the existing DPV1 crossing of the river. As such, the visual and recreational impacts of DPV1 already exist, and DPV2 would create additional incremental impacts. EIR/EIS analysis of wilderness and recreation is presented in Section D.5.6.3 (Kofa NWR to Colorado River) and Section D.5.6.4 [Palo Verde Valley (Colorado River to Midpoint Substation)]. These sections discuss the impacts to wilderness and recreation in the Colorado River area.

C29-24 The commenter is correct that cost is not an issue within the scope of CEQA or NEPA. The New Conventional Generation Alternative (Sections C.5.5.1 and Section 4.5.1 of Appendix 1) 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. 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, the new generation alternative was eliminated from full evaluation in the EIR/EIS because it does not meet the project's objectives, not for economic reasons.

C29-25 As described in Section D.2.1, in addition to literature review, a team of biologists surveyed the California and Arizona portion of the proposed DPV2 route. In addition to performing an overview survey of the entire length of the proposed route, each tower site and spur road where disturbance would occur was surveyed. The use of aerial maps at a scale of 1 inch to 500 feet (much more detailed than those presented in the EIR/EIS Appendix 10) as well as staked locations were utilized to identify project area location. At each site, a data sheet was completed that included the following information: site name, observer, date, UTM coordinates, photo number, plant and wildlife species observed, site description, and threatened, endangered, and/or special status species concerns. Vegetation types were classified and described. The general project area was also surveyed in 2002 and 2003 by EPG and the results of these surveys were used as a general reference in this section.

Because the Proposed Project would be located in an existing corridor, existing access roads would be used to the maximum extent feasible. Loss of vegetation is addressed in Section D.2 (Biological Resources), and specifically Impact B-1 (Construction activities would result in temporary and permanent loss of native vegetation), Impact B-6 (Construction activities would result in indirect or direct loss of listed plants), and Impact B-8 (Construction activities would result in indirect or direct loss of individuals or a direct loss of habitat for sensitive plants) address the disturbance of vegetation and would be reduced to less than significant levels with the implementation of Mitigation Measures B-1a (Prepare and implement a Habitat Restoration/Compensation Plan), B-6a (Develop a transplanting plan), and B-8a (Conduct surveys for listed plant species).

Specific requirements for construction and operation of the DPV2 Project through the Kofa NWR will be established by the Refuge managers if a permit is issued to SCE for this project.

C29-26 Please see Response C29-16. For the Proposed Project, three key viewpoints were selected for detailed analysis along the Harquahala to Kofa route segment. Discussions of these viewpoints are presented in sections D.3.2.1 (Environmental Setting) and D.3.6.1 (Environmental Impacts). Existing conditions photographs and visual simulations for these three key viewpoints are presented as Figure D.3-2A/2B for the area north of I-10 near the Big Horn Mountains, Figure D.3-3A/3B for the I-10 crossing, and Figure D.3-4A/4B for the area north of the Eagletail Mountains.

C29-27 Comment noted. Please refer to Response B1-2.

C29-28 The selection of a simulation location in the Harquahala Valley were determined as follows. Turning north on Salome Highway from Courthouse Road, views of the project would be very brief given that the route crosses Salome Highway to the east (beyond the primary cone

of vision of northbound travelers) just north of Courthouse Road. From that point north views are primarily directed to the west to north across the Harquahala Plain. In contrast, southbound views of the project are available for an extended distance as the road gradually converges on the route crossing of the highway. Please see responses to Comments C29-16 and C29-29 regarding the process used for selection of simulation locations.

C29-29 This comment suggests that additional viewpoints and simulations are needed to adequately assess visual impacts in the Harquahala to Kofa region. Additional viewpoints and simulations can always provide greater differentiation of impacts. But with an infinite number of possible viewing locations available, it is essential to identify a reasonable number of viewpoints that can be representative of the broader viewing opportunities. In this case, four key viewpoints were established for the Proposed Project in the Harquahala to Kofa region. An additional key viewpoint was established on Salome Highway for the Palo Verde Alternative. An additional key viewpoint was established on BLM access Road YE013 to Courthouse Rock for the Harquahala West Alternative. And a key viewpoint was established on southbound Salome Highway for the Harquahala Switchyard Alternative. In each case, the viewpoint was selected to represent additional, similar views in the area. The selection of seven key viewpoints to evaluate the Proposed Project and alternatives was and is considered adequate to address the project's potential visual impacts. The I-10 key viewpoint (KVP 2) near the west crossing was selected over the east crossing (near Burnt Mountain) because more towers are visible in the primary cone of vision of westbound travelers approaching the west crossing and the views of the west crossing are of longer duration compared to the east crossing.

C29-30 Please see Section I of the Final EIS/EIR for a discussion of the public involvement process and information provided during the Draft EIR/EIS comment period. The commenter's opposition to the Proposed Project has been noted.

C29-31 Please refer to Response B6-5 discussing why the EIR/EIS analyzed a "reasonable range of alternatives." The commenter's opposition to the Harquahala-West Alternative has been noted, and is consistent with the conclusions of the EIR/EIS.

The history regarding selection of the DPV1 does not affect the baseline setting or impacts of the currently Proposed Project. The construction of DPV1 did create a transmission corridor, and provides already disturbed access roads. Regardless, the fact that an alternative was not selected in the DPV1 process does not mean that it would not be a feasible or environmentally preferred alternative for the Proposed Project at this time. Section D.6.8.1 of the EIR/EIS discusses the agricultural impacts that would result from construction of the Harquahala-West Alternative. Section E.2.1.1 (Proposed Project vs. Alternatives Near Palo Verde Nuclear Generating Station) concludes that the Harquahala-West Alternative was not found to be environmentally superior/preferable.

C29-32 Figure Ap.1-1a (Palo Verde Hub Configuration Scenarios) is a transmission system diagram similar to Figure A-1. Please see Response C29-12.

C29-33 Please refer to Responses A8-9 and E1-116 regarding tower height tables in Appendix 3. Arizona tower heights are included as part of the Devers-Harquahala route. SCE has not provided this data to the EIR/EIS team; however, even if tower heights cannot be matched exactly for each tower, the range of heights in the area is approximately 10 feet, which would not change the impact analysis.

C29-34 The aerial photos used in Appendix 10 are referenced using “sheet” rather than “page” and thus Appendix 10 contains Sheet 1 (of 39) though Sheet 39 for Devers-Harquahala and Sheet 1 (of 20) through Sheet 20 for West of Devers.

The aerial photos in Appendix 10 were taken long after construction of the DPV1 project; in fact, the individual DPV1 towers and access roads can be seen when the photos are enlarged and viewed on a computer monitor. The disturbance created by construction of DPV1 is part of the environmental baseline at this time, and while the EIS/EIR does not re-consider the impacts of that existing project, it does present mitigation measures to reduce the impacts associated with the newly proposed DPV2 project.

C29-35 The tower numbers presented in Appendix 10 came from engineering diagrams provided by SCE. SCE has not provided the data that would allow us to present the specific number shown on each tower number on these maps. Please see Response C29-33. BLM does not have enforcement authority within the Kofa NWR.

C29-36 The photographs provided by the commenter have been noted. Please refer to Response C29-16 and C29-19 regarding the infeasibility of providing photos and simulations at all points along the 300-mile project route.