

December 10, 2010

Billie Blanchard
California Public Utilities Commission
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Re: Comments on the Notice of Preparation for a Focused Supplemental Environmental Impact Report for the Devers–Palo Verde No. 2 Transmission Line Project, Colorado River Substation Expansion Proposed by Southern California Edison (SCH No. 2005101104)

Dear Ms. Blanchard:

Please accept these comments on behalf of Basin and Range Watch regarding the Notice of Preparation (“NOP”) for a Focused Supplemental Environmental Impact Report for the Devers–Palo Verde No. 2 Transmission Line Project, Colorado River Substation Expansion Proposed by Southern California Edison (SCH No. 2005101104).

The Commission should re-open the issue of the location of the substation as part of the focused supplemental EIR regarding an expanded substation from 44 acres to 90 acres. The substation is in very sensitive habitat for local populations of Mojave fringe-toed lizard (*Uma scoparia*), and in a sand movement corridor. Alternative locations for the substation need to be analyzed. Placing this large substation in a sand transport corridor cannot be mitigated, as was shown in the California Energy Commission case on Palen Solar Power Project.

The cumulative impacts to Fringe-toed lizards should be also considered, as many new projects are planned for Chuckwalla Valley that would directly or indirectly impact sand habitats, including: Blythe Solar Power Project, Genesis Solar Energy Project, Palen Solar Power Project, Desert Sunlight Solar Farm, and a photovoltaic project called Desert Quartzite south of Highway 10 near Blythe. More applications have been submitted for largescale renewable energy projects in the vicinity according to Bureau of Land Management.

The proposed substation would directly impact 90 acres of sand habitat and indirectly impact many more acres because it would disrupt sand transport processes, potentially starving down-wind habitat for Fringe-toed lizards of sand and eliminating habitat. These impacts cannot be mitigated and should be avoided.

We have worked closely with herpetologists studying Fringe-toed lizards, and much genetic work has yet to be done. With research, various Distinct Population Segments

(DPU) of *Uma scoparia* have been identified, including the Amargosa River Population DPU, which has been petitioned for listing under the Endangered Species Act due to habitat loss and disturbance of sand habitats. Sampling in Chuckwalla Valley and the Blythe area has not been adequate yet to resolve such lineages, but with finer-scale mapping a DPU could be found to exist in the region, the southernmost range of Mojave fringe-toed lizard.

Some populations of the Mojave River Lineage of *Uma scoparia* have been documented as becoming extirpated recently: the El Mirage, Harper Lake, and a Los Angeles County dunes population are gone. Habitat loss, sand depletion, surface stabilization or compaction, loss of vegetation for cover and food contribute to the elimination of local populations of this species.

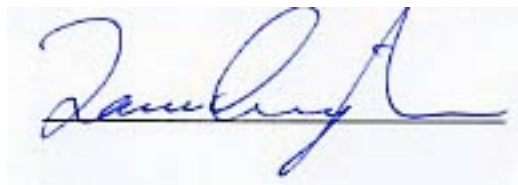
Sand originates from hydrologic processes, riverine and paleolake systems, and sand transport corridors. Sand flow carried by prevalent wind currents provides habitat regeneration for Fringe-toed lizards, and is crucial for genetic connectivity between breeding populations on the best habitat patches.

Personal communications with Fringe-toed lizard expert Dr. Mark Fisher (University of California, Boyd Deep Canyon Desert Research Center) revealed the following:

If the population size is small on a local sand habitat, then it is more prone to extinction. This is especially evident given climate change scenarios. There are papers documenting the extinction of a small, isolated population. So it is of vital importance to provide connectivity with other populations.

Connectivity is vital, and blocking sand transport corridors with fenced substations would negatively impact local populations of Fringe-toed lizards. If the sand flow is cut off, a few lizards hang on after the sand moves away, but the population density drops precipitously. Specific types of sand habitat are needed to provide connectivity with other populations of Fringe-toed lizards.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Laura Cunningham', written over a horizontal line.

Laura Cunningham
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