

1. Introduction

This document is an Addendum to the Public Scoping Report for the Devers–Palo Verde No. 2 Transmission Line Project that was published in December 2005. In compliance with the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC – California Lead Agency) and United States Department of Interior, Bureau of Land Management (BLM – Federal Lead Agency) conducted public scoping for the Devers–Palo Verde No. 2 Transmission Line Project (DPV2). Scoping began in October/November 2005 with the issuance of a Notice of Preparation, conducting public scoping meetings in California, and receiving written and oral comments during a 30-day public scoping period. A Public Scoping Report was completed and published by the CPUC and BLM in December 2005 that satisfied the scoping requirements of the CPUC pursuant to CEQA. In order to fulfill the public scoping requirements under the National Environmental Policy Act (NEPA), the BLM issued a Notice of Intent to prepare an Environmental Impact Statement on December 7, 2005. This started a second public comment period that included public scoping meetings in Arizona in January 2006. This report documents the issues and concerns raised during the Notice of Intent (NEPA) scoping process held from December 7, 2005 to January 20, 2006.

Background. Southern California Edison (SCE), the Project proponent, has filed an application with the CPUC for a Certificate of Public Convenience and Necessity and an application for Amended Right-of-Way Grant to the BLM for approval to construct DPV2. As part of the review process, the CPUC and BLM will prepare the EIR/EIS, which will evaluate the potential environmental impacts associated with DPV2 and will identify mitigation measures to reduce these impacts, where possible.

SCE will also submit an application to the Arizona Power Plant and Transmission Line Siting Committee (Siting Committee) for a Certificate of Environmental Compatibility. The Siting Committee (made up of representatives of Arizona State agencies and appointed members of the public) will hold a formal hearing on the application, and then will propose a recommended order to the Arizona Corporation Commission (ACC). The ACC will make a final decision on the project in a public meeting.

1.1 Purpose of Scoping

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

Comments received during the scoping process are part of the public record as documented in this scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC and BLM in determining the appropriate scope of issues to be addressed in the EIR/EIS.

The purpose of scoping for DPV2 was to:

- Inform the public and relevant public agencies about the DPV2 project, CEQA and NEPA requirements, and the environmental impact analysis process;
- Identify potentially significant environmental impacts for consideration in the EIR/EIS;
- Identify possible mitigation measures for consideration in the EIR/EIS;
- Identify alternatives to the DPV2 project for evaluation in the EIR/EIS; and
- Compile a mailing list of public agencies and individuals interested in future project meetings and notices.

1.2 Summary of DPV2 Project

SCE is proposing to construct a new electric transmission line to import power generated in Arizona into southern California. The 278-mile project would consist of two components: (1) construction from Devers Substation to Harquahala Generating Substation, and (2) upgrades west of Devers Substation. From SCE's Devers Substation (north of Palm Springs) to the Harquahala Generating Station near Wintersburg, Arizona, SCE would build a new 230-mile, 500 kV transmission line, roughly following the route of Interstate 10. This segment parallels SCE's existing 500 kV transmission line, Devers–Palo Verde No. 1. The California segment of DPV2 would be 128 miles long and would be located in unincorporated Riverside County and the Cities of Palm Springs, Cathedral City, and Coachella. The Arizona segment of DPV2 would be 102 miles long within La Paz and Maricopa Counties.

The DPV2 project would also include the upgrading of existing transmission lines between the Devers Substation and the Vista Substation (in Grand Terrace) and the San Bernardino Substation (in San Bernardino County). Along 40 miles of existing transmission corridors (through the Cities of Palm Springs, Banning, Beaumont, and Calimesa), one new 230 kV transmission line would be built and two existing lines removed. Along two other existing transmission line segments (in the Cities of Redlands, Loma Linda, Colton, and Grand Terrace), existing transmission towers would be reconducted (existing wires would be replaced with new, larger capacity wires and 14 structures and one inter-set structure would be replaced between San Bernardino Junction and Vista Substation).

1.3 Scoping Report Organization

This scoping report addendum includes four main sections and appendices, as described below:

- Section 1 provides an introduction to the report and describes the purpose of scoping and a brief overview of the DPV2 project.
- Section 2 provides information on the scoping meeting and notification materials, including the Notice of Intent.
- Section 3 summarizes the comments received and issues raised during the scoping comment period.
- Section 4 provides the next steps in the EIR/EIS process.

Appendices consist of all the supporting materials used during scoping. These appendices include copies of the Notice of Intent and meeting materials provided at the public scoping meetings. It also includes copies of comment letters received on DPV2.

2. Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for DPV2. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the project (meetings, fax, email, mail, and phone).

2.1 Notice of Intent

As required by federal regulation 40 C.F.R. 1508.22, BLM issued a Notice of Intent (NOI) on December 7, 2005 that summarized the DPV2 Project, stated its intention to prepare a joint EIR/EIS, and requested comments from interested parties (See Appendix A). The NOI was published in the Federal Register (Vol. 70, No. 234) on December 7, 2005, which initiated the public scoping period. The review period for the NOI ended on January 20, 2006. However, the California Department of Fish and Game (CDFG), Ontario Office requested an extension of this deadline due to coordination issues and the depth of comments. The CDFG was given an extension until February 1, 2006 to submit its comments. In addition, comments from other agencies, groups, and citizens that were received after the end of the scoping period on January 20, 2006 were accepted and incorporated into this Addendum to the Scoping Report.

In addition to publication of the NOI in the Federal Register, BLM distributed over 2,500 copies of the Notice of Public Scoping Meetings (Notice) to federal, State, regional, and local agencies; elected officials; and the general public. This Notice included notification of public scoping meetings to be held in Arizona, summary of the NOP scoping process, description of the DPV2 Project, request for comments, and sources for Project information. The mailing included the following approximate distribution:

- 80 agency representatives (includes over 40 different agencies)
- 120 environmental groups/organizations
- 50 private organizations
- 60 tribal government representatives
- 20 elected officials (including 12 Assembly and State Senators)
- 2,100 private citizens (including those within 300 feet of the project corridor)

In addition, twenty-six additional copies of the Notice were delivered to the local repository sites. The Notice and all future DPV2-related documents are available for review at the following repository sites:

Table 1. Repository Sites

Devers to Harquahala – Library Sites		
Desert Hot Springs City Public Library	11691 West Drive, Desert Hot Springs, CA 92240	(760) 329-5926
City of Palm Springs Library	300 S. Sunrise Way, Palm Springs, CA 92262	(760) 323-8298
Cathedral City Branch Library	33520 Date Palm Drive, Cathedral City, CA 92234	(760) 328-4262
Rancho Mirage City Library	42520 Bob Hope Drive, Rancho Mirage, CA 92270	(760) 341-7323
Palm Desert City Library	73300 Fred Waring Drive, Palm Desert, CA 92260	(760) 346-6552
Indio Public Library	200 Civic Center Mall, Indio, CA 92201	(760) 342-0185
Coachella Branch Library	1538 7th Street, Coachella, CA 92236	(760) 398-5148
Palo Verde Valley Library District	125 W. Chanslorway, Blythe, CA 92225	(760) 922-5371
Quartzsite Public Library	465 N. Plymouth Ave. Quartzsite, AZ 85346	(928) 927-6593
Buckeye Public Library	312 N. 6th St, Buckeye, AZ 85326	(623) 386-2778

Table 1. Repository Sites

Devers to Harquahala – U.S. Bureau of Land Management Offices	
Palm Springs/South Coast Field Office	690 W. Garnet Avenue, N. Palm Springs, CA 92258(760) 251-4800
Phoenix Field Office	21605 N. 7th Avenue, Phoenix, AZ 85027-2099(623) 580-5500
Yuma Field Office	2555 East Gila Ridge Road, Yuma, AZ 85365-2240(928) 317-3200
West of Devers – Library Sites	
City of Riverside Library	5505 Dewey Avenue, Riverside, CA 92504.....(951) 359-3906
San Bernardino County Library	104 W. Fourth Street, San Bernardino, CA 92415(909) 387-5723
Colton Public Library	656 N. Ninth Street, Colton, CA 92324(909) 370-5083
Grand Terrace Library	22795 Barton Road, Grand Terrace, CA 92313(909) 783-0147
City of Loma Linda Library	25581 Barton Road, Loma Linda, CA 92354(909) 796-8621
A.K. Smiley Public Library	125 West Vine Street, Redlands, CA 92373.....(909) 798-7565
Mentone County Library	1870 Mentone Boulevard, Mentone, CA 92359.....(909) 794-2657
Yucaipa Branch Library	12040 5th Street, Yucaipa, CA 92399(909) 790-3146
Calimesa City Library	974 Calimesa Boulevard, Calimesa, CA 92320.....(909) 795-9807
Beaumont Library District	125 East 8th Street, Beaumont, CA 92223.....(951) 845-1357
Banning Public Library	21 W Nicolet Street, Banning, CA 92220.....(951) 849-3192
Morongo Community Library	11581 Potrero Road, Banning, CA 92220(951) 849-5937
West of Devers – U.S. Bureau of Land Management Office	
California Desert District Office	22835 Calle San Juan Del Los Lagos, Moreno Valley, CA 92553(951) 697-5200

NOI Scoping Meetings

The CPUC and BLM held three public scoping meetings in three locations in Arizona on January 18 and 19, 2006. The scoping meetings provided an opportunity for the public and government agencies to obtain more information on the DPV2 Project, to learn more about the CEQA and NEPA processes, to ask questions regarding the DPV2 project, and to provide formal comments on the DPV2 project.

Meeting Locations and Handouts

The three scoping meetings were held at the locations and on the dates specified in Table 2.

Table 2. Arizona Public Scoping Meetings

Date and Time	Meeting Location	Sign-Ins	Formal Comments Received
Wednesday, January 18, 2006 2:00 to 4:00 p.m.	Estrella Mountain Community College South Community Room 2nd Floor, Estrella Hall 3000 North Dysart Road Avondale, Arizona 85323	31	5
Wednesday, January 18, 2006 6:30 to 8:30 p.m.	Harquahala Valley Irrigation District 402 South Harquahala Valley Road Tonopah, Arizona 85354	23	4
Thursday, January 18, 2006 2:00 to 4:00 p.m.	Quartzsite Town Hall Council Chambers 465 North Plymouth Avenue Quartzsite, Arizona 85346	31	4

Handouts and informational materials available at each meeting are listed below. Refer to Appendix B for copies of these materials.

- Notice of Public Scoping Meetings (Notice)
- PowerPoint Presentation
- Project Fact Sheets
- Self-Addressed Speaker Comment Sheet
- Speaker Registration Card

Other information was also made available for public review, which included a copy of the December 2005 Public Scoping Report, schematics from the Proponent’s Environmental Assessment illustrating tower types and measurements, and large-scale maps of the project alignment.

Newspaper Advertisements

The date and location of the public scoping meetings were advertised in four local newspapers. The advertisements provided a brief synopsis of the project and encouraged attendance at the meetings to share comments on the project. The meeting advertisements were placed in the newspapers presented in Table 3 (also see Appendix B-1).

Publication	Advertisement Dates
The Arizona Republic*	Friday, January 6, 2006 & Saturday, January 14, 2006
Palo Verde Valley Times	Friday, January 6, 2006
Palo Verde Valley Times/Quartzsite Times	Wednesday, January 11, 2006
West Valley View	Friday, January 6, 2006 & Friday, January 13, 2006
Yuma Daily Sun	Thursday, January 5, 2006 & Sunday, January 15, 2006

* The advertisement in the Arizona Republic included distribution in the Goodyear and Buckeye areas only.

Tribal and Agency Consultation

BLM initiated the government-to-government consultation process under *Executive Memorandum of April 29, 1994*, contacting tribal governments via a letter distributed by certified mail on October 24, 2005 (see Appendix C). The purpose of the letter was to notify tribal governments of the DPV2 project and inquire if any tribal governments were interested in initiating government-to-government consultation regarding the DPV2 project pursuant to the *Executive Memorandum of April 29, 1994*. Responses received to date from tribal governments are presented in Appendix C-3.

In addition, over 40 federal, State, and local agencies were contacted by phone in October/November 2005 to provide information on the project and to determine interest in face-to-face meetings to discuss the project. One agency contacted during this period was the U.S. Fish and Wildlife Service, including the Refuge Manager for Kofa National Wildlife Refuge. In addition to the U.S.D.A. Forest Service, San Bernardino National Forest has been contacted. The comments received during the telephone, face-to-face, and mail/email correspondence consultations are summarized in Appendix D.

2.2 Outreach

The CPUC and BLM also provided opportunities for the public and agencies to ask questions or comment on the DPV2 project outside of the meetings. A public hotline, email address, and website were established and available during the public comment period. Information on these additional outreach efforts are described below.

Project Information Hotline

To offer another opportunity to inquire about the scoping meetings or the DPV2 project, a hotline [(800) 886-1888] was established to take oral comments and questions from those unable to attend the meetings. Telephone messages were retrieved daily and all calls were responded to within a 48-hour period. The hotline also served as a fax line to allow for comments to be submitted by fax instead of mail. Comments received through this hotline (voice or fax) have been considered and incorporated in this report.

Email Address

An email address was established for the DPV2 project (dpv2@aspenerg.com) to provide another means of submitting comments on the scope of the EIR/EIS. The email address was provided on meeting handouts and posted on the website. Comments received by email have been considered and incorporated in this report.

Internet Website

Information about the DPV2 project was made available through the Project website hosted by the CPUC. During the December 2005/January 2006 scoping period, the website included electronic versions of the Project application, NOI, and Project-related maps and thus provided another public venue to learn about the Project. The website will remain a public resource for the Project and will announce future public meetings and hearings. The website address is:

<http://www.cpuc.ca.gov/environment/info/asp/dpv2/dpv2.htm>.

3. Scoping Comments

This section summarizes the comments raised by the public and agencies during the NOI (NEPA) scoping process for the DPV2 EIR/EIS. This summary is based upon both written and oral comments that were received during the NOI review period, which officially extended from December 7, 2005 to January 20, 2006. All written and oral comments received during the public comment period on the NOI, during the public scoping meetings, through the phone line (voice/fax), and through email were reviewed for this report and for the EIR/EIS. Section 3.1 discusses the comments in relation to the human environment, physical environment, and DPV2 project alternatives. Section 3.2 references Appendix D, which summarizes all comments received during the scoping period.

Fourteen individuals presented oral comments during the scoping meetings and two persons left voicemail comments on the Project information hotline, and 52 comment letters were submitted during the scoping process. Appendix D summarizes all written and oral comments received. In addition to private individuals, 14 government agencies, three tribal governments, six private organizations, and three nonprofit groups submitted written and/or oral comments:

Government Agencies and Special Districts

- U.S. Department of Defense, U.S. Army, Yuma Proving Ground
- Arizona Game & Fish Department
- Arizona State Land Department
- Arizona Department of Transportation
- California Department of Fish and Game
- California Department of Transportation
- South Coast Air Quality Management District
- Maricopa County, Board of Supervisors (submitted by Peter Martori; Martori Farms)
- Imperial County, Planning & Development Services
- City of Scottsdale, Arizona (via Five Star, Inc.)
- City of Scottsdale, Arizona, Water Resources Department
- City of Calimesa, California
- Central Arizona Project/Central Arizona Water Conservation District
- Harquahala Valley Irrigation District

Tribal Governments – Responses to Scoping Notice

- Agua Caliente Band of Cahuilla Indians
- White Mountain Apache Tribe
- Yavapai-Prescott Indian Tribe

Tribal Governments – Responses to Government-to-Government Consultation Request

- Cahuilla Band of Indians
- Yavapai-Prescott Indian Tribe
- Havasupai Tribe

Private Organizations and Companies

- The Tahiti Group
- Martori Farms (Martori Family General Partnership)
- Vanguard Development LLC
- Harquahala Valley Farms (via Five Star, Inc.)
- Vanderbilt Farms, LLC (via Five Star, Inc.)
- ABCDW, LLC (via Five Star, Inc.)
- Torrey Pines Development, LLC (via Five Star, Inc.)

Groups and Nonprofits

- Maricopa Audubon Society
- Sierra Club – Grand Canyon Chapter
- Arizona Wilderness Coalition

3.1 Key Issues Raised during the Public Comment Period

As discussed above, written and oral comments were provided by members of the public, organizations, and government agencies. The discussion below presents the key issues identified from the written and oral comments received on the project. The specific issues raised during the public scoping process are summarized according to the following topics and issue areas:

- Human Environment Issues and Concerns
- Physical Environment Issues and Concerns
- Purpose and Need
- Alternatives
- Cumulative Projects
- Environmental Review and Decision-Making Process

3.1.1 Human Environment Issues and Concerns

Some public comments focused on the potential effect of the project on the human environment, including the health and safety impacts of electric and magnetic fields (EMFs), impacts to property values, safety and fire risk issues, construction impacts, and conflicts with planned uses.

EMFs

The Harquahala Valley Irrigation District expressed concern that if the Harquahala West Alternative was selected that the electromagnetic force from DPV2 would adversely interact with the reinforcing steel embedded in its structures in the area, specifically the irrigation distribution system. In addition, the Central Arizona Project (CAP), or Central Arizona Water Conservation District (CAWCD), stated that DPV2 could impact CAWCD's 22-foot-diameter pre-stressed concrete cylinder water pipeline given that it has noticed that electromagnetic interference from DPV1 has the potential to degrade the pipeline.

Construction Impacts

Many commenters indicated that construction of the DPV2 project would cause negative environmental impacts. One commenter states that almost 400 acres, that includes the right-of-way (ROW), would be affected due to construction within Kofa National Wildlife Refuge (Kofa). Major disturbances would occur during construction of the 85 tower sites due to pouring of the concrete tower footings and use of the equipment necessary to erect the towers and string the electric lines. However, most likely additional land would be affected as construction vehicles travel along the DPV1 and DPV2 ROWs, or completely outside the ROW. This construction could eliminate the necessary ground cover or protection needed by some species to traverse the area, create a disturbed area facilitating the establishment of invasive non-native plant species, and increase traffic of off-road vehicles. In addition, commenters suggested that construction activities outside the ROW and trespass during construction could impact wildlife.

Safety Issues and Fire Risk

One commenter states that the DPV2 project would place a high priority and reliance on nuclear power generation, which includes hazardous materials, dangerous processes, and the increased production of nuclear waste. Other commenters expressed concern that the transmission line would carry strong electric voltages that would be dangerous to people, farms animals, and wildlife, and should not be placed close to housing developments.

Impacts to Property Values

Various commenters, including the City of Scottsdale Water Resources Department, expressed concern about negative impacts to existing and future property values, especially those properties in the Harquahala Valley region.

Conflicts with Existing or Planned Land Uses

Various commenters expressed concern that the DPV2 project could impact existing and planned land uses, especially existing uses at Kofa and the Harquahala Valley region. Many commenters expressed concern that the DPV2 project would traverse Kofa. Commenters believed that the DPV2 project is incompatible with the mission of the National Wildlife Refuge System, which is to conserve fish, wildlife, and plant resources and their habitats for the benefit of the general public. Currently Kofa is used for bird watching, nature/wildlife studies, hiking, and photography, and commenters stated that the DPV2 project would impact these uses. Commenters were also concerned the DPV2 project would encourage more people to access Kofa. A few commenters expressed concern about impacts to other federal lands, such as BLM lands where there could be impacts to areas that are currently being considered for wilderness protection in the Ranegras Plain region east of the Kofa.

Many commenters, especially in the Harquahala Valley region, expressed concerns about the impacts of the Harquahala West Alternative to existing agricultural lands in the Harquahala Valley, including irrigated lands; prime agriculture land; and farming practices such as irrigation, crop-dusting, and tilling. Various government agencies expressed concern about the Harquahala West Alternative affecting land uses in the region. The CAP/CAWCD indicated that the DPV2 project would cross the CAP canal in two locations and parallel it for several miles. CAWCD expressed concern that electromagnetic interference due to the operation of DPV2 could impact CAWCD's 22-foot-diameter pre-stressed concrete cylinder pipe that supplies Arizona with water. CAWCD would require any impacts from DPV2 to this pipeline be mitigated. In addition, the City of Scottsdale Water Resources Department expressed concern that the Proposed Project and the Harquahala Subalternate Route could impact the City's future ability to utilize a previously identified water pipeline corridor running from City lands in the Harquahala Valley Irrigation District to the CAP canal. The City also expressed concern about potential impacts to the continued use of its land for farming and ongoing water deliveries to this land from irrigation canals. Maricopa County objected to the Harquahala West Alternative because it would impact the Harquahala community and its future.

The City of Calimesa also expressed concern that the DPV2 project could potentially impact the planned future development of the City.

3.1.2 Physical Environment Issues and Concerns

Biological Resources Issues

Many commenters expressed concern about potential impacts to wildlife, habitats, and the pristine nature of the desert landscape. Commenters were especially concerned about the wildlife, habitats, and vegetation in Kofa. Many commenters noted that the DPV2 project would increase habitat fragmentation, harm desert tortoise and bighorn sheep, introduce non-native plant species, and encourage illegal off-road vehicle use in Kofa, as well as other desert areas in the vicinity. One commenter notes that Kofa is important desert tortoise (and Sonoran desert tortoise) habitat because combined with the Yuma Proving Ground to the east it provides a large contiguous protected habitat. In addition, the DPV2 ROW through Kofa is prime desert bighorn sheep and desert tortoise habitat.

The Arizona Game and Fish Department stated that special status species have been documented in the vicinity of the Proposed Project and the Subalternate Routes. In addition, the Game and Fish Department states that Subalternate Route 2 traverses important wildlife habitat in the Plomosa and Dome Rock Mountains, and would have significant adverse impacts to bighorn sheep and other wildlife. Subalternate Routes 3 and 4 may also have significant adverse impacts to wildlife, depending on project details.

A few commenters specifically stated that construction of the DPV2 project would cause impacts to biological resources. This construction 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. In addition, construction would disturb certain areas thereby facilitating the establishment of invasive non-native plant species through the soil disturbance and increased traffic. Similarly, another commenter stated that roads have a significant impact on wildlife and natural hydrologic cycles as the existence of roads facilitates the spread of noxious weeds, specifically Saharan mustard.

One commenter stated that the existing DPV1 has, and the proposed DPV2 transmission lines would have, impacts to wildlife migration. Another commenter expressed concern that birds perching on the towers or transmission lines would be hurt or killed. A suggestion was made that DPV2 be constructed according to “raptor-safe” specifications that would minimize electrocution hazards to perching or nesting raptors.

Cultural Resources Issues

Three tribal governments commented that the DPV2 project could impact cultural resources. A representative from the Yavapai-Prescott Indian Tribe stated that the DPV2 project would traverse the aboriginal home of the Tribe, and is concerned with impacts to tribal land and cultural resources, particularly bighorn sheep, which are culturally significant to the Tribe. The Tribe also requested that archaeological surveys be performed for the Project Alternatives and that the Tribe is given the opportunity to identify any cultural properties found. The White Mountain Apache Tribe stated that the DPV2 project would not have any impact on the Tribe’s known cultural resources; however, in case of inadvertent discovery, project construction should stop and the proper authorities notified. The Cahuilla Band of Mission Indians require that there is a Native American Monitor onsite during the project due to known/unknown sites in the area.

Visual Resources Issues

Many commenters, especially private citizens in the Harquahala and La Paz Valleys, expressed concern that the DPV2 project would cause significant visual impacts in general area due to the Harquahala West Alternative and Subalternate Route 1, respectively. The Arizona State Land Department expressed concern that the Harquahala West Subalternate Route would create visual impacts on currently undisturbed land owned by the State of Arizona. Many other commenters expressed similar concern that the pristine desert landscape of Kofa would be destroyed by the DPV2 project.

Water Resources Issues

The California Department of Fish and Game (CDFG) expressed concern regarding the elimination of watercourses or wetlands due to the DPV2 project. The CDFG opposed any removal of watercourses or wetlands, and recommended that these features be retained and provided with setbacks in order to preserve their riparian and aquatic values, and maintain their value to wildlife populations in the area.

3.1.3 Purpose and Need

The purpose and need for the DPV2 project was questioned in a majority of the comments, particularly by private citizens and nonprofit groups, such as the Maricopa Audubon Society, Sierra Club Grand Canyon Chapter, and the Arizona Wilderness Coalition. Commenters noted that the DPV2 project has been in the planning stages for approximately 15 years during which time California has not needed the transmission line. In support of this case, some commenters refuted the argument that the California energy crisis of 2000/2001 was due to lack of transmission, but rather stated that it was caused by manipulation of the energy market. Others commenters stated that Arizona, especially the Phoenix metropolitan area, is growing rapidly and will, most likely, demand and consume all the power generated in the State, therefore no surplus energy will be available to transmit to California.

Commenters also question the need for the DPV2 project given that it would produce significant negative environmental impacts. Many commenters stated that California should produce its own energy within its own borders, preferably using “clean” or renewable energy sources. The commenters believed that the purpose and goals of the DPV2 project could be better accomplished by implementing demand reduction, such as energy conservation or efficiency programs, or developing local generation using renewable energy sources, such as solar, wind, and biomass.

Some commenters stated that they were concerned that clean power was being shipped out of Arizona to California. The commenter stated that Arizona is growing and will need power, especially all the “clean” energy generated in the state. A few commenters believed that there is a “laundering scheme” occurring in which California can get energy from “dirty” sources, while appearing to be actually using “clean” energy. In this situation, Arizona would accept “dirty” energy from outside the state, and in turn send California “clean” energy because California regulations require that only “clean” energy can be imported. A specific proposal regarding a transmission line from a coal power plant in Idaho to central Arizona was mentioned.

Many commenters stated that Arizona does not need the DPV2 project, yet it would get most of the impacts. The route through California would follow existing ROWs with little impacts, while the route through Arizona would traverse new lands, such as Kofa and agricultural lands.

One commenter stated that the DPV2 project is not necessary because SCE has not shown that its facilities and sources in its service area are unproductive, and therefore does not warrant supplemental power from Arizona. Power produced in Arizona should stay in Arizona; if California needs supplemental power in the future it can be transmitted using the existing transmission system.

3.1.4 Alternatives

Summary of Alternatives Issues

No Project Alternative

Some commenters stated that they supported the No Project Alternative. Another commenter supported the non-transmission alternative that includes new generation sources that are safer and more environmentally friendly.

Local Generation

Many commenters stated that California should generate the power needed for its residents, and not rely on Arizona. Other commenters noted that as an alternative to the DPV2 project, California should invest in and employ renewable and “clean” energy sources such as solar, wind, or biomass resources to generate the power needed to meet its energy demand. Commenters added that these technologies are cheaper and better solutions than investing in more fossil fuel plants and long transmission lines. One commenter suggests that instead of constructing DPV2, SCE should build smaller “clean” power plants close to the energy demand markets in California.

Demand Reduction

Many commenters stated, as part of their comments regarding the need for the DPV2 project, that California could and should offset the need for the DPV2 project through the implementation of energy conservation programs and energy efficiency measures. The commenters noted that these methods are the least costly and most reliable ways to reduce demand. In addition, commenters suggested that California could reduce its specific demand for power generated in Arizona by generating its own power within California’s borders.

Alternative Routes

Various commenters, including Arizona Game and Fish Department, Maricopa County, and the Harquahala Valley Irrigation District, expressed support for the Proposed Project because it follows the existing DPV1 corridor and would minimize impacts to wildlife, agricultural land, future development, the Harquahala Valley, and certain viewsheds. Similarly many of the same commenters strongly opposed the Harquahala West Alternative because it would create many of the same aforementioned impacts that the Proposed Project would eliminate. The Harquahala Valley Irrigation District believes that the Harquahala West Alternative is not financially viable because the high land acquisition cost would reduce any savings established by using fewer towers along a shorter route. One commenter, representing several agriculture operations, is concerned that a route through the Harquahala Valley is being considered again after it was denied during the review of DPV1. This route would impact prime agricultural lands into which property owners have invested \$100 million. Other commenters objected to the Harquahala West Alternative because it would create significant impacts to agricultural lands, visual/aesthetic resources, property values, and divide the Harquahala Valley.

Some commenters understand the need for the project, and believe that the Proposed Project is the best route because it follows the existing utility corridor from DPV1. The commenters indicate that SCE must have a good reason to deviate from the Proposed Project because the desert has already been disturbed for DPV1 and there is no reason not to use this previously disturbed route for DPV2.

Many commenters were opposed to any route that traverses Kofa because there were many impacts to biological and visual resources, and believe that it should remain undisturbed open space. One commenter submitted a petition signed by 48 landowners stating their opposition to the DPV2 project, particularly Subalternate Route 1, traversing the La Paz Valley.

The Arizona State Land Department supports the Palo Verde Subalternate Route.

Alternatives Suggested

Following are all written and oral comments that suggested an alternative, along with a statement of each suggestion.

Group and Nonprofit Suggestions

Arizona Wilderness Coalition

Suggested placing the entire DPV2 transmission line in the I-10 corridor as the I-10 corridor has already significantly impacted wildlife movement.

Private Citizen Suggestions

Alan Cowan

Suggested placing DPV2 through military lands in the area.

Lon Stewart

Need to explore other alternatives to the DPV2 project, including energy storage systems that reduce peak local energy demand and shave peak power consumption, such as ice thermal storage system similar to that used in Phoenix.

Harry Thomas

Suggested routing DPV2 north of I-10 where there are existing access roads.

3.1.5 Environmental Review and Decision-Making Process

Issue Analysis Guidance

The South Coast Air Quality Management District (SCAQMD) recommended several information sources and methods to be used as guidance for preparation of the air quality analysis, localized significance and air quality analysis, mobile source health risk assessment, development of sample mitigation measures, and general SCAQMD rules and relevant reports. SCAQMD also suggested performing localized air quality significance and impact analyses, as well as mobile source health risk assessment.

The CDFG recommended that the biological resources analysis consider the California Natural Diversity Database (CNDDDB), the Draft Coachella Valley Multiple Species Habitat Conservation Plan, and Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP) for additional species, including those that may require special surveys. The CDFG provided a list of some species from these plans that should be considered. The CDFG also suggested that the biological resources analysis include potential habitat impacts related to these plans, and any necessary mitigation due to the impacts. In addition, any impacts to State or federal listed species and appropriate mitigation measures should be included in the EIR/EIS.

The CDFG also suggested that focused biological studies and surveys be conducted prior to any environmental or discretionary approvals. These studies and surveys should include a complete assessment of flora and fauna in the project area, comprehensive discussion of adverse impacts and appropriate mitigation, and development and analysis of alternatives that would reduce impacts to biological resources. The CDFG included species suggestions of how to complete these studies and necessary items to include.

Many commenters requested that specific issues be analyzed in the EIR/EIS, including the use of energy conservation programs, energy efficiency measures, and renewable energy sources to offset the goals of the DPV2 project; and the incompatibility between the mission of National Wildlife Refuge System and the use of Kofa for the DPV2 transmission line corridor.

Public Involvement

A few private citizens, especially in the Harquahala Valley region, indicated that they had not received proper notification of the DPV2 project or the scoping meetings, and one requested that the Project be delayed due to this issue.

Imperial County expressed concern that the County and its residents, specifically those in the Palo Verde area, were not notified about the DPV2 project or the associated November 2005 public scoping meetings in a sufficient manner to allow each party to prepare comments and/or attend the scoping meetings. In addition, the County requested that the County and the Palo Verde community be re-notified with a sufficient amount of time to provide responses.

Several commenters requested copies of the Draft EIR/EIS, including the City of Calimesa. Imperial County requested that a copy of the Draft EIR/EIS be sent to the Palo Verde Improvement Association in Palo Verde, California for public review.

Regulatory Compliance

Various government agencies stated that the DPV2 project would require certain permits, licenses, or plan modifications prior to project construction. A representative of the Agua Caliente Band of Cahuilla Indians stated that the Tribe has an ordinance regulating the development of public utility projects on the Reservation. This ordinance would require SCE to secure approval of a Tribal conditional use permit (CUP) prior to construction of the DPV2 project. In addition, the Tribe requests that a mitigation measure be added to the DPV2 project requiring approval of a CUP. Arizona State Land Department stated that it would require a right-of-way application for any portion of the project that traversed its land, and the processing of such an application would require 18 to 24 months from filing. The CAP/CAWCD stated that SCE must obtain a license to cross the CAP canal and associated lands.

Both the California and Arizona Departments of Transportation identified necessary permits. The California Department of Transportation (Caltrans) states that an encroachment permit, including improvement plans, as well as environmental analysis would be required for any work performed within Caltrans right-of-way. Arizona Department of Transportation (ADOT) similarly stated that an encroachment permit would be required when DPV2 crosses I-10 or US 95.

The CDFG indicated that a California Endangered Species Act (CESA) Incidental Take Permit must be obtained if the construction or operation of the DPV2 project has the potential to result in the “take” of plant or animal species listed under CESA. The CDFG also stated that consultation with the CDFG or the U.S. Fish and Wildlife Service (USFWS) would be required if any listed species would be potentially impacted by the project. In addition, the CDFG requires that SCE notify CDFG of activities that would “divert, obstruct, or change the natural flow or the bed, channel, or bank of a river, stream, or lake, or use streambed material” prior to beginning the activity. The CDFG stated that it would subsequently issue a Lake and Streambed Alteration Agreement for the project that would require additional CEQA compliance, for which CDFG provided additional recommendations.

Imperial County stated that if Subalternate Route 3 was selected that the County would need to modify the Palo Verde Community Area Plan to allow routing of DPV2 through the area. Additional time would be required to modify these plans and potentially make a General Plan Amendment for the Palo Verde area.

3.2 Summary of All Public and Agency Comments

Appendix D presents a comprehensive summary of all oral and written comments received from the general public, government agencies, nonprofit groups, and private companies. Appendix D-1 to D-4 provides a summary of all written comments received. Appendix D-5 includes a summary of all oral comments received during the NOI scoping meetings and on the Project information hotline. Appendix D-6 presents a summary of agency consultations and Appendix D-7 presents Tribal Government consultations conducted as part of the NOI scoping process. Appendix D-8 presents a summary of all comments by issue area. Appendix E includes copies of written comments received on the DPV2 project during the NOI scoping period.

4. Next Steps in EIR/EIS Process

4.1 EIR/EIS Events and Documents

While scoping is the initial step in the environmental review process, additional opportunities to comment on the Project EIR/EIS will be provided. The CPUC and the BLM will provide for additional public input when the Draft EIR/EIS is released and during the public meetings for the Draft EIR/EIS. Table 4 presents the proposed schedule for the EIR/EIS and identifies where in the process the public and agencies can provide additional input in the environmental review process.

Table 4. EIR/EIS Events and Documents

Event/Document	Purpose	Approximate Date
Completed Events/Documents		
Notice of Preparation (NOP) for CEQA	Release of NOP*	Notified interested parties and agencies of the CPUC's and BLM's intent to prepare an EIR/EIS.
	Public Review Period	Held 30-day public scoping period on the Project to provide for public comments on the scope of EIR/EIS.
Scoping Meetings – NOP – CEQA portion	Five scoping meetings were held	Presented information on the Project and provided opportunity for public and agency comments in a public forum.
Notice of Intent (NOI) for NEPA	NOI published in the Federal Register	Initiated the NEPA public scoping process and served to inform other cooperating agencies of the BLM's and CPUC's intent to prepare an EIR/EIS.
Scoping Report for CEQA NOP Process		Reported public and agency comments on the Proposed Project and environmental issues of concern to the public and agencies. This report includes comments made during the scoping process for the CEQA Notice of Preparation.
Scoping Meetings – NOI – NEPA portion	Three scoping meetings were held	Presented information on the Project and provided opportunity for public and agency comments in a public forum.
Addendum to Scoping Report for NOI/NEPA Process		Include public and agency comments on the Proposed Project and environmental issues of concern to the public and agencies from second round of scoping meetings on the Notice of Intent/NEPA process.

Table 4. EIR/EIS Events and Documents

Event/Document	Purpose	Approximate Date
Upcoming Events/Documents		
Draft EIR/EIS	Release of Draft EIR/EIS	Presents impacts and mitigation for the Proposed Project and its alternatives May 2006
	Public Review Period	CEQA: 45-day minimum review period for State agencies. NEPA: BLM requires a 60-day public review period (516 DM 4.24) or 90-day if Plan Amendment is required. May to June 2006
	Draft EIR/EIS Public Meetings	Allows for public comment on the draft document Mid-May to mid-June 2006
Final EIR/EIS	Release of Final EIR/EIS	Final EIR/EIS, with response to comments, issued by CPUC and BLM Final EIR/EIS is filed with US EPA August 2006
	Decision on the project	Final EIR/EIS available for 30-day period of public review before BLM can issue Record of Decision BLM issues the Record of Decision; 45-day appeal period CPUC certifies EIR/EIS and issues a Proposed Decision Notice of Determination filed with State Clearinghouse within 5 days of certification leads to 30 day statute of limitations on challenges to EIR adequacy Fall 2006 Winter 2006

* The NOP was mailed to interested parties, property owners within 300 feet of the Project route; federal, State, and local regulatory agencies; and elected officials.

Refer to the website for specific EIR/EIS document dates: <http://www.cpuc.ca.gov/environment/info/aspen/dpv2/dpv2.htm>