Email: SCE Ivanpah Control

From: Mulkerin, Bridget <bridget.mulkerin@audubon.org>
Sent: Friday, May 15, 2026 3:26 PM
To: Ivanpah-Control Project Team
Subject: Draft EIR Comments - Audubon California
Attachments: Audubon CA - 5.15.26 - Ivanpah-Control DEIR Comments.pdf

Hi,

Please find Audubon California's comments on the Ivanpah-Control Draft EIR. We appreciate the opportunity to comment and are available if you have any questions.

Kindly,
Bridget

—

Bridget Mulkerin
Senior Manager, Climate Policy
Pronouns: she/her

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May 15, 2026

John Forsythe, CPUC Project Manager
c/o Aspen Environmental Group
235 Montgomery Street, Suite 967
San Francisco, CA 94104
Via email to: Ivanpah-Control@aspeneg.com

Subject: Comments on the Ivanpah-Control Project Draft Environmental Impact Report

Dear Mr. Forsythe:

Audubon California, a state office of the National Audubon Society, offers these comments on the Ivanpah-Control Project's Draft Environmental Impact Report (DEIR). We thank you for the time you took to develop this draft. The comments offered below are informed by our conservation efforts throughout the state. In addition to this work, Audubon California is actively engaged in renewable energy initiatives statewide, including transmission. We hope that our feedback is helpful in strengthening these efforts as well as improving outcomes for birds.

Interest in This Proceeding
The National Audubon Society supports transmission that is sited and operated properly to avoid, minimize, and mitigate effectively for impacts on birds, other wildlife, and the places they need. Our recent report, Birds and Transmission: Building the Grid Birds Need, provides the rationale for our transmission initiative and the need to rapidly upgrade the U.S. transmission grid to transition to a clean energy economy and avoid the worst impacts of climate change for birds and people.

Building the Grid Birds Need
Our Survival by Degrees: 389 Bird Species on the Brink report released in 2019 found that two-thirds of North American birds are at risk of range loss and potential extinction. If we act, we can help improve the changes for 76% of species at risk, but we need to double or triple current transmission capacity.

Risks to Birds from Transmission Development
There are two main population level risks to birds from transmission development: Transmission line collision mortality and habitat loss and degradation. Collision mortality is highest when power lines are sited where species susceptible to collision fly frequently at lower altitudes. When conducting our analyses, Audubon evaluates collision mortality risk using a 10-kilometer buffer; roughly the distance at which wetlands and other concentration areas attract at risk species.

Habitat loss can be direct or indirect. Direct habitat loss occurs near transmission line rights-of-way (ROWs) when vegetation management or ground disturbance causes birds to vacate previously useful habitat. Audubon uses a 0.75 km buffer to assess this habitat loss, not only for the ROW itself but for access roads, marshalling yards, and so on. Indirect habitat loss occurs when birds experience temporary or permanent reductions in reproductive success or survival beyond the immediate ROW after a project is developed. Indirect impacts can also include increased predation due to raptor and corvid perching on transmission structures. Indirect impacts are evaluated on a project and species-specific basis.

Key Concerns and Recommendations
Our screening analysis of the routes and alternatives was done by our GIS team. They compared data related to birds and their habitat needs such as the National Audubon Society's Important Bird Areas (IBAs) database, which are sites identified using a global standardized, science-based criteria that recognize places essential for breeding, migrating, and wintering birds. They also analyzed fall and spring migratory stopover, priority species locations, biodiversity data and more in relation to route options. The data utilized is attached in the Appendix. The results are intended for qualitative risk assessment and to

define areas of higher relative risk across the landscape where special efforts may be needed to avoid, minimize, and mitigate avian collision mortality due to transmission line collisions.

Route preference
For each of the Crater Mountain and Manzanar routes, we recommend the realignment alternative over the proposed project. For the Fossil Falls project, there is not significant difference between the proposed project and the realignment alternative. Therefore, we recommend the proposed project, since it is along an existing ROW. These are the better options for birds from Audubon's perspective due to the reasons listed below. The attached appendix includes our data for your reference.

- Crater Mountain:
    - The realignment alternative reduces localized impacts where bird presence and habitat are most concentrated. At the broader 10 km scale, both routes perform similarly, with nearly identical overlap in IBAs (16% each) and migration stopover density, and only a negligible increase for the realignment during fall migration (65% vs. 64%). Within the 0.75 km buffer, the realignment alternative overlaps far less with Audubon IBAs (16% vs. 48%). Owen's Lake is the impacted IBA and is important stopover for migratory shorebirds such as the near threatened Least Sandpipers and state species of special concern Snowy Plover.

      Audubon clean energy priority species are less impacted with this route (77 vs. 208 birds). The most common species in this group include the Western Meadowlark, LeConte's Thrasher and Eared Grebe. This route also reduces overlap with key habitat features associated with bird presence, including rare species richness (16% vs. 32%) and freshwater wetlands (1% vs. 6%). Neither route overlaps with significant surface water (0%). These habitats are all critical for foraging and migration. Although the proposed project shows slightly lower overlap with terrestrial irreplaceability and the Crater Mountain Wilderness Study Area, these differences are outweighed by the realignment's consistent reduction in direct interactions with bird populations and habitats. Overall, the realignment alternative minimizes ecological disturbance where it matters most, making it the more bird-protective option.

      We recognize the realignment does have slightly greater overlap with terrestrial irreplaceability (33% vs. 20%), a higher presence within the Crater Mountain Area of Critical Environmental Concern (7% vs. 2%), and marginally higher coverage in certain biodiversity and connectivity metrics. Despite these considerations, observed bird concentrations, special-status species, and water-associated habitats consistently favor the realignment. When analyzing Tribal land data with a 0.75 km buffer, we found no intersections with either Crater Mountain route. We encourage outreach to the nearby reservations, Big Pine and Fort Independence for their insights into this. Overall, because the realignment alternative reduces direct interactions with bird populations and sensitive habitats, the realignment alternative represents the more protective option for birds.

Data	Buffer	Proposed Project	Realignment Alternative
Audubon IBAs	10 km	16% of the area	16% of the area
Spring Migration Stopover Density	10 km	26% of the area	26% of the area
Fall Migration Stopover Density	10 km	64% of the area	65% of the area
Clean Energy Priority Species	10 km	819 birds observed in the area, 11 species	820 birds observed in the area, 10 species
Maximum Surface Water	10 km	0% of the area	0% of the area
Audubon IBAs	0.75 km	48% of the area	16% of the area

Audubon Clean Energy Priority Species	0.75 km	208 birds observed in the area, 8 species	77 birds observed in the area, 8 species
BLM Designated Areas of Critical Environmental Concern – Crater Mountain	0.75 km	2% of the area	7% of the area
Water Bodies	0.75 km	1% of the area	0% of the area
Species Biodiversity – highest ranking	0.75 km	80% of the area	81% of the area
Species Biodiversity – high ranking	0.75 km	6% of the area	0% of the area
Terrestrial Connectivity – large natural habitat areas	0.75 km	97% of the area	99% of the area
Terrestrial Irreplaceability – medium level	0.75 km	20% of the area	33% of the area
Terrestrial Rare Species Richness – highest level	0.75 km	32% of the area	16% of the area
Freshwater Emergent Wetlands	0.75 km	6% of the area	1% of the area
Maximum Surface Water GT 0.5 acre – lake/pond	0.75 km	1% of the area	0% of the area
Rare Vegetation Types – Other	0.75 km	83% of the area	76% of the area

- Manzanar:
    - The realignment alternative presents a still favorable outcome for birds when considering both broad and localized effects, with important tradeoffs to acknowledge. At the 10 km scale, the realignment minimally reduces overlap with Owen's Lake and Owen's River IBAs (19% vs. 20%). This benefit is offset by increased overlap with both spring (14% vs. 9%) and fall (58% vs. 49%) migration stopover density, indicating a greater presence in migratory pathways. Owen's River is notable for its federally endangered Southwestern Willow Flycatcher, Yellow-billed Cuckoo, as well as state species of special concern Swainson's Hawk and Burrowing Owl populations. We appreciate your plans to support the Burrowing Owl as outlined in the DEIR. We encourage you to reference the Conservation Management Actions outlined in the Desert Renewable Energy Conservation Plan (DRECP) to support Yellow-billed Cuckoo. Priority shorebird habitat remains the same between alternatives (8%), suggesting no clear advantage at this scale.

      At the finer 0.75 km scale, the comparison becomes more nuanced. The realignment reduces overlap with Audubon clean energy priority species (113 vs. 179 birds observed) but involves a higher number of species (12 vs. 7). Some of these are Leconte's Thrasher and Western Meadowlark. It also introduces new overlap with priority shorebird habitat (6% vs. 0%) and significantly increases presence within the Owens Lake Area of Critical Environmental Concern (27% vs. 12%), representing tradeoffs in sensitive and managed landscapes.

      Still, the realignment performs better across several habitat and landscape condition metrics associated with ecological sensitivity, including lower overlap with the highest levels of terrestrial irreplaceability (5% vs. 13%) and rare species richness (5% vs. 13%), as well as reduced freshwater wetland overlap (2% vs. 10%). While the proposed project shows higher coverage of top-ranked biodiversity areas (98% vs. 87%), the realignment shifts more area into the "high" category (13% vs. 2%), suggesting a redistribution rather than a clear loss of overall biodiversity value.

Utilizing a 0.75 km buffer to analyze overlapping with Tribal land, we found the proposed project route partially overlaps with the Lone Pine Reservation. The realignment alternative does not intersect with the Lone Pine Reservation, however. We encourage outreach to the Tribe to ensure the line does not impact areas of cultural significance for this community.

Overall, the realignment alternative involves trade-offs, particularly increased overlap with migratory pathways, certain special status bird observations, and protected areas like Owens Lake. However, it also reduces interaction with some of the most sensitive habitat features, including wetlands, irreplaceable lands, and areas of high rare species richness. As these habitat characteristics are strongly linked to ecological resilience and species vulnerability, the realignment can still be considered a preferable option from a bird conservation perspective, provided that its increased overlap with migration corridors and managed areas is carefully mitigated. We recommend utilizing the DRECP guidance for mitigation throughout the project.

Data	Buffer	Proposed Project	Realignment Alternative
Audubon IBAs	10 km	20% of the area	19% of the area
Spring Migration Stopover Density	10 km	9% of the area	14% of the area
Fall Migration Stopover Density	10 km	49% of the area	58% of the area
Priority Shorebird Habitat	10 km	8% of the area	8% of the area
Clean Energy Priority Species	10 km	880 birds observed in the area, 11 species	877 birds observed in the area, 11 species
Maximum Surface Water – lake/pond	10 km	3% of the area	3% of the area
Audubon IBAs	0.75 km	32% of the area	27% of the area
Priority Shorebird Habitat	0.75 km	0% of the area	6% of the area
Audubon Clean Energy Priority Species	0.75 km	179 birds observed in the area, 7 species	113 birds observed in the area, 12 species
BLM Designated Areas of Critical Concern – Owens Lake	0.75 km	12% of the area	27% of the area
Species Biodiversity – highest ranking	0.75 km	98% of the area	87% of the area
Species Biodiversity – high ranking	0.75 km	2% of the area	13% of the area
Terrestrial Connectivity – large natural habitat areas	0.75 km	100% of the area	100% of the area
Terrestrial Irreplaceability – highest level	0.75 km	13% of the area	5% of the area
Terrestrial Rare Species Richness – highest level	0.75 km	13% of the area	5% of the area
Freshwater Emergent Wetlands	0.75 km	10% of the area	2% of the area
Rare Vegetation Types – Other	0.75 km	100% of the area	100% of the area

- Fossil Falls:
    - The realignment alternative performs just slightly better for birds. At the 10 km scale, both alternatives are essentially equivalent, with identical overlap in IBAs (11% each), fall migration (90% each), and priority shorebird habitat (4%), and only a negligible difference in spring migration (43% vs. 44%) and bird observations. The IBA in the area is the

Southern Sierra Desert Canyons which is a critical part of the Pacific Flyway in California. This indicates that at a broad landscape level, neither option meaningfully changes regional bird use patterns.

At the 0.75 km scale, the realignment alternative shows clear reductions in direct bird interactions and several sensitive habitat indicators, including fewer Audubon clean energy priority species observations (21 vs. 58). Some of the most observed species include the Western Meadowlark, Golden Eagle, Lark Sparrow and Osprey. There is reduced overlap with most Areas of Critical Environmental Concern and lower exposure to water bodies (1% vs. 2%), irreplaceable lands (19% vs. 25%), and rare species richness (42% vs. 55%) in the realignment alternative. However, these benefits come with tradeoffs: the realignment alternative increases overlap in some protected areas (e.g., Fossil Falls at 12% vs. 4%) and in certain vegetation types. It also reduces terrestrial connectivity (38% vs. 71%) and coverage of the highest-ranked biodiversity areas (27% vs. 42%). Overall, while the realignment lowers direct bird presence and several key habitat sensitivities, it also shifts impacts into other ecological dimensions. This may be an improvement for bird conservation. In our analysis, we found no overlap with Tribal lands for either route. Still, we encourage outreach and engagement with Tribes to confirm.

Since bird observation is gathered from e-bird, it may be the case that there are more species identifications along the proposed project route as it is along a road. More people may frequent this area and report bird sitings. Therefore, we conclude there is not a significant difference between either route. Ultimately, we advise following the proposed project route since it is collocated along an existing ROW.

Data		**Buffer**	**Proposed Project**	**Realignment Alternative**
Audubon IBAs		10 km	11% of the area	11% of the area
Spring Migration Stopover Density		10 km	44% of the area	43% of the area
Fall Migration Stopover Density		10 km	90% of the area	90% of the area
Priority Shorebird Habitat		10 km	4% of the area	4% of the area
Clean Energy Priority Species		10 km	75 birds observed in the area, 9 species	74 birds observed in the area, 9 species
Maximum Surface Water		10 km	1% of the area (lake or pond)	1% of the area (lake or pond)
Audubon Clean Energy Priority Species		0.75 km	58 birds observed in the area, 9 species	21 birds observed in the area, 6 species
BLM Designated Areas of Critical Environmental Concern	Mohave Ground Squirrel	0.75 km	21% of the area	11% of the area
	Fossil Falls		4% of the area	12% of the area
	Rose Spring		1% of the area	0% of the area
Water Bodies		0.75 km	2% of the area	1% of the area
Species Biodiversity – highest ranking		0.75 km	42% of the area	27% of the area
Species Biodiversity – high ranking		0.75 km	56% of the area	52% of the area

Terrestrial Connectivity – conservation planning linkages	0.75 km	71% of the area	38% of the area
Terrestrial Irreplaceability – highest level	0.75 km	25% of the area	19% of the area
Terrestrial Rare Species Richness – highest level	0.75 km	55% of the area	42% of the area
Freshwater Emergent Wetlands	0.75 km	0% of the area	0% of the area
Maximum Surface Water GT 0.5 acre	0.75 km	1% of the area	1% of the area
Rare Vegetation Types – Freemont's cottonwood	0.75 km	8% of the area	4% of the area
Rare Vegetation Types – Other	0.75 km	29% of the area	36% of the area

General recommendations

- **Community and Environmental Justice Considerations**
  - Involve impacted communities, particularly Tribes, low-income and marginalized groups, early in the planning process to ensure their concerns are heard and addressed.
  - Ensure that the economic, environmental, and energy benefits of transmission projects are equitably distributed, including job creation and access to clean energy.
  - Consider and respect cultural, historical, and community values in project planning and implementation.
  - Please note, while we identified areas of overlap with Tribal land in our comments above, we did not consult with Tribal members for these comments. We strongly recommend the project managers for this route consult Tribal communities about this route directly.

- **Avian Collision Mitigation**
  - Avoidance
    - Transmission routes should avoid bisecting critical bird movement pathways, particularly between known roosting, nesting, and feeding areas. Thoughtful siting reduces habitat fragmentation and minimizes disruption to migratory and resident bird populations.
  - Utilize Existing Rights-of-Way (ROWs)
    - Audubon strongly supports leveraging existing ROWs through collocation with existing transmission infrastructure, including parallel development and underbuilds. This approach minimizes habitat disturbance in undeveloped areas and significantly reduces avian collision risks. Additionally, collocation is often the most cost-effective and efficient way to enhance grid functionality while minimizing environmental impact.
  - Minimize Planes of Lines
    - For collocation to be truly effective in reducing avian mortality, new transmission lines must be designed to minimize the number of wire planes and avoid creating additional collision hazards in sensitive areas. Strategic placement and design can significantly lower risks to birds while maintaining the integrity and efficiency of the grid.
  - Utilize Line Markings with Bird Diverters
    - Bird diverters are an effective tool for reducing avian collisions, but their deployment should be strategic. Since line marking is not practical for all spans, it should be prioritized for areas with the highest documented collision risks, such as near wetlands, rivers, and key migration corridors.
  - Utilize Lighting and UV Applications
    - Proper lighting strategies can minimize bird attraction and disorientation, which is particularly important for nocturnal migratory species. Shielded, downward-

directed lighting reduces skyglow and prevents unnecessary illumination of transmission structures. Additionally, UV-reflective coatings and markers, which are visible to many bird species but less obtrusive to humans, can enhance visibility of wires and reduce collision risks in high-priority areas.

- **Avian Protection Plans**
  - Audubon supports the development of voluntary Avian Protection Plans (APPs) in coordination with the US Fish and Wildlife Service, particularly those that drill down to the level of GIS-based risk assessments to prioritize areas for collision and electrocution mitigation. In the absence of these site-specific prioritizations many if not most APPs instead detail best practices and criteria that trigger certain mitigation such as line marking and allow the utility discretion to implement these on their system.

- **Maximize Grid Efficiency**
  - Advanced transmission technologies (ATTs) and grid-enhancing technologies (GETs) improve grid reliability and efficiency and provide significant benefits for wildlife, particularly birds. These technologies help optimize existing transmission infrastructure, reducing the need for new transmission lines that have the potential to fragment habitats and pose collision risks to birds. By enhancing grid efficiency, ATTs can minimize environmental disruption while supporting the responsible expansion of renewable energy.
  - Furthermore, advanced transmission technologies facilitate better integration of renewable energy sources such as wind and solar, which are crucial for expanding clean energy access. By improving the transmission system's capacity and flexibility, these technologies help ensure that electricity can be delivered efficiently and reliably.

Summary of Concerns and Recommendations
We recognize the importance of updating the Ivanpah-Control line to strengthen grid reliability and we urge the Commission to consider our recommendation of utilizing the proposed alternative options for the Crater Mountain and Manzanar sections of the line. However, for the Fossil Falls section of the route, we recommend the proposed project option. We believe these routes have the best outcomes for birds. For mitigation, we urge you to reference the DRECP which outlines some key species mitigation recommendations, such as the western burrowing owl and golden eagle. We appreciate the Commission's consideration of these comments. Audubon is committed to working with regulators, utilities, developers, and stakeholders to advance solutions that balance energy demand with conservation concerns. We encourage you to reach out with any questions regarding our GIS analysis and recommendations for birds. Thank you for the opportunity to be involved in this public process.

Sincerely,
Bridget Mulkerin
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bridget.mulkerin@audubon.org

Appendix:

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