

F. Comparison of Alternatives

F.1 Introduction

This section summarizes and compares the environmental advantages and disadvantages of the Proposed Project and the alternatives evaluated in this Supplemental EIR. This comparison is based on the assessment of environmental impacts of the Proposed Project and each alternative, as identified in Section D. Section C introduces and describes the alternatives considered in this Supplemental EIR; Appendix 1 includes the Alternatives Screening Report, which documents all alternatives considered in the screening process.

Section F.2 describes the California Environmental Quality Act (CEQA) requirements for alternatives and Section F.3 describes the methodology used for comparing alternatives. Section F.4 defines the environmentally superior alternative, based on comparison of each substation alternative with the Proposed Project. Section F.5 presents a comparison of the No Project Alternative with the alternative that is determined in Section F.4 to be environmentally superior.

Conclusion Regarding Environmentally Superior Alternative. In this section, the CPUC has identified the Environmentally Superior Alternative, as required by CEQA Guidelines Section 15126.6(d) and (e)(2). The results of the comparisons of substation alternatives are presented below, with the Environmentally Superior Alternative shown first and the least environmentally preferable alternative shown sixth. The rationale for these conclusions is presented in Section F.4.

1. Avoidance Alternative #1: This alternative is found to have the least environmental impacts. However, if Avoidance Alternative #1 is found to cause significant schedule delays that would affect its ability to meet project objectives, then the decision makers will determine whether it is a feasible alternative (see detailed discussion in Appendix 1, Alternatives Screening Report).
2. Southern Alternative
3. Avoidance Alternative #2
4. Avoidance Alternative #3
5. Partial Avoidance Alternative
6. Proposed CRS
7. No Project Alternative

F.2 CEQA Requirements for Alternatives Comparison

The California Environmental Quality Act (CEQA) requires the following for alternatives analysis and comparison:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. Guidelines Section 15126.6(d)

If the environmentally superior alternative is the No Project Alternative, CEQA requires identification of an environmentally superior alternative among the other alternatives [CEQA Guidelines Section 15126.6(e)(2)].

F.3 Alternatives Comparison Methodology

The following methodology was used to compare alternatives in this EIR/EIS:

- **Step 1: Identification of Alternatives.** A screening process (described in Appendix 1) was used to identify eight site alternatives to the Proposed Project. A No Project Alternative was also identified. No other feasible alternatives meeting most of the project objectives were identified that would lessen or alleviate significant impacts.
- **Step 2: Determination of Environmental Impacts.** The environmental impacts of the proposed and the alternative substation sites were identified in Section D, including the potential impacts of substation construction and operation. The significant and unmitigable (Class I) impacts that would occur with the Proposed Project and alternatives are summarized for each area below.
- **Step 3: Comparison of Proposed Project with Alternatives.** The environmental impacts of the Proposed Project were compared to those of each alternative site to determine the environmentally superior alternative. The environmentally superior alternative was then compared to the No Project Alternative.

Determining an environmentally superior alternative requires balancing many environmental factors. In order to identify the environmentally superior alternative, the most important impacts in each issue area were identified and compared (see the detailed comparison table in Section F.4). If an alternative is not considered environmentally preferred for an issue area and there are no significant unmitigable (Class I) impacts, a ranking has not been established and it is stated that there is no preference for the alternative in terms of that issue area. Although this Supplemental EIR identifies an environmentally superior alternative, it is possible that the ultimate decisionmakers could balance the importance of each impact area differently and reach a different conclusion. The following comparison highlights situations where an alternative would create impacts in one area as an unintended consequence of avoiding impacts to another area.

F.4 Environmentally Superior Alternative

The comparison begins with a summary of the significant impacts that cannot be mitigated (Class I impacts). Highlighting these areas of significant impacts identifies which alternatives would be capable of eliminating significant unavoidable environmental effects of the Proposed Project, and which alternatives would create new significant impacts. This simplifies identification of the environmentally superior alternative while considering all issue areas equally.

The following section also summarizes the advantages and disadvantages of each alternative and presents a determination of whether the Proposed Project or the alternative is considered to be environmentally superior within each resource area. The environmentally preferred alternative is identified for each resource area. An alternative identified as “preferred” in one resource area may still have significant environmental effects, but when compared with the other alternatives, its environmental effects would be reduced.

F.4.1 Substation Site Alternatives

The following section compares five site alternatives with the Proposed Project:

- Partial Avoidance Alternative
- Avoidance Alternative #1

- Avoidance Alternative #2
- Avoidance Alternative #3
- Southern Alternative

The primary impact differences between the proposed CRS site and the alternative sites result from shifting the substation site to minimize impacts to an active sand transport corridor (see discussion in Section C.2). Therefore, for the following disciplines, the impacts of the alternative sites would be similar to those of the CRS expansion, because the peak construction activities would likely be the same and because five site locations are in close geographic proximity. These disciplines are not individually analyzed in this Supplemental EIR for the reasons explained in Section A.2.2, and no environmental preference is identified herein.

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| ■ Visual Resources | ■ Transportation and Traffic |
| ■ Land Use | ■ Public Health and Safety |
| ■ Wilderness and Recreation | ■ Air Quality |
| ■ Agriculture | ■ Hydrology and Water Resources |
| ■ Geology, Mineral Resources and Soils | ■ Socioeconomics |
| ■ Noise | ■ Greenhouse Gas |

Mitigation included in the DPV2 Final EIR/EIS (2006) would be implemented at the proposed CRS or any alternative site that is approved.

Summary of Impacts

Construction of the proposed expanded CRS would cause 90 acres of direct disturbance impacts, in addition to direct impacts caused by access roads, telecommunications facilities, well digging and other project components. It would also cause a reduction of sand transported to 1,365 acres downwind (east) of the Proposed Project area. This resultant deflation would ultimately eliminate 1,365 acres of Mojave fringe-toed lizard (MFTL)¹ sand dune habitat that comprises the easternmost extent of the Chuckwalla sand transport corridor. Therefore, the **Proposed Project** would have two significant and unavoidable (Class I) biological resources impacts for the MFTL, three potential significant and unavoidable cultural resources impacts, and one significant and unmitigable impact from cumulative greenhouse gas emissions:

- *Impact B-9*: Construction activities would result in indirect or direct loss of individuals and/or habitat for sensitive wildlife.
- *Impact B-19*: The Proposed Project would contribute to a cumulatively considerable impact to special-status species when combined with impacts from past, present, and reasonably foreseeable future projects.
- *Impact C-1*: Construction of the project could cause an adverse change to known historic properties.
- *Impact C-2*: Construction of the project could cause an adverse change to unknown significant buried prehistoric and historical archaeological sites or buried Native American human remains.
- *Impact C-3*: Construction of the project could cause an adverse change to Traditional Cultural Properties.
- *Impact GHG-1*: Project activities would cause a net increase of greenhouse gas emissions.

All other impacts would be less than significant with implementation of mitigation included in the DPV2 Final EIR/EIS and in Section D of this Supplemental EIR.

¹ MFTL is not a “listed” species, but is a California Department of Fish and Game “species of concern” and a BLM sensitive species.

The **Partial Avoidance Alternative** would reduce both direct and indirect impacts to Mojave fringe-toed lizard sand dune habitat to 90 acres and 855 acres, respectively. However, impacts to MFTL (Impact B-9) would still be significant and unmitigable (Class I). The Partial Avoidance Alternative would also reduce impacts to rare plants and fewer cultural resources would be impacted as well (6 documented resources, 4 of which are unevaluated). Impacts to desert tortoise (10 acres of creosote scrub habitat) would be greater than at the proposed CRS location where the potential for desert tortoise is low. However, impacts to desert tortoise at the Partial Avoidance Alternative site would be less than significant with standard mitigation that was included in the DPV2 Final EIR/EIS (2006).

The **Avoidance Alternative #1** would move the substation outside of the active sand transport corridor, reducing both direct and indirect impacts to Mojave fringe-toed lizard sand dune habitat to less than significant with mitigation. The Avoidance Alternative #1 would also reduce impacts to rare plants. Avoidance Alternative #1 substation footprint itself would impact fewer cultural resources (3 unevaluated resources); however, 3 additional resources would be impacted within the study area buffer for gen-tie/transmission interconnections and the access road (6 total unevaluated documented resources). Impacts to desert tortoise would be greater (90 acres of creosote scrub habitat); however, the impacts would be less than significant with standard mitigation.

The **Avoidance Alternative #2** would move the substation outside of the active sand transport corridor, reducing both direct and indirect impacts to Mojave fringe-toed lizard sand dune habitat to less than significant with mitigation. The substation site would directly impact 20 acres of marginal MFTL habitat that would be adverse, but less than significant and would not require mitigation; however, approximately 10 acres of MFTL habitat that would be impacted by the access road is within the sand transport corridor and would require mitigation to reduce impacts below the level of significance. In addition, because the substation would be out of the sand transport corridor, it would not have the extensive indirect impacts from sand transport obstruction. The Avoidance Alternative #2 would also reduce impacts to rare plants. It would also impact the fewest cultural resources compared to the Proposed Project and other alternatives (4 unevaluated documented resources). Impacts to desert tortoise would be greater (70 acres of creosote scrub habitat); however, the impacts would be less than significant with standard mitigation.

The **Avoidance Alternative #3** would move the substation outside of the active sand transport corridor, reducing both direct and indirect impacts to Mojave fringe-toed lizard sand dune habitat. MFTL mitigation would not be required for the substation site itself, but mitigation would be required for approximately 10 acres of direct impacts resulting from construction/widening of access roads in stabilized and partially stabilized sand dunes. However, this alternative would impact desert tortoise (45 acres of creosote scrub habitat), and would impact a State-jurisdictional wash, but these impacts would be less than significant with mitigation. It would also have slightly greater impacts to cultural resources (15 unevaluated documented resources) than the proposed CRS or the other alternative sites. Avoidance Alternative #3 would slightly reduce impacts to rare plants.

The **Southern Alternative** would move the substation outside of the active sand transport corridor, reducing both direct and indirect impacts to Mojave fringe-toed lizard sand dune habitat. MFTL mitigation would not be required for the substation site itself, but mitigation would be required for approximately 10 acres of direct impacts resulting from construction/widening of access roads in stabilized and partially stabilized sand dunes. Impacts to rare plants would also be reduced, because construction of the substation would be unlikely to affect ribbed cryptantha, Harwood's eriastrum, or other sensitive dune plants. Impacts to cultural resources would be greater (13 documented resources, 10 of which are unevaluated) than at the proposed CRS and other alternative sites (except Avoidance Alternative #3). Impacts to desert tortoise and creosote scrub habitat (90 acres) would be greater as well; however, the impacts

would also be less than significant with standard mitigation. ~~There would be new impacts to State-jurisdictional washes because~~ Several small highly divided sandy channels drain to the west across the site and approximately three have the potential to be jurisdictional. Therefore, the Southern Alternative would create new impacts to ~~State~~-potentially jurisdictional desert washes, which provide important habitat for wildlife and plants. In addition, an active desert kit fox den and other mammalian burrows occur onsite. With incorporation of mitigation required in the DPV2 Final EIR/EIS, these impacts would be less than significant.

Conclusion

Due to the proximity of the alternative sites and the proposed CRS, many of the environment impacts would be similar. Table F-1 compares the five alternative sites with the Proposed Project for biological resources, cultural resources and overall ground disturbance. Table F-1 also indicates land ownership. All of the alternative substations sites and/or their transmission or gen-tie interconnections except for the Southern Alternative would likely be located on some private land.

All of the alternative sites except the Partial Avoidance Alternative would be located outside of the active sand transport corridor and would reduce the Proposed Project's significant and unmitigable impact on MFTL sand dune habitat to a less than significant level. However, all alternative sites would require gen-tie/transmission interconnections as well as the widening of the existing DPV1 access road through the sand transport corridor to Wiley Well Road, which would result in less than significant impacts with implementation of mitigation.

The Partial Avoidance Alternative would reduce both direct and indirect impacts to MFTL sand dune habitat by being located partially outside of the corridor; however, impacts to MFTL (Impact B-9) would still be significant and unmitigable (Class I). Therefore, it is preferred to the proposed CRS, but not the other alternative sites. Likewise, due to their proximity, all of the alternatives would have similar potential significant and unmitigable impacts to TCPs as the Proposed Project.

Overall, **Avoidance Alternative #1 is the environmentally superior alternative**, due to its reduction of significant impacts to biological resources (MFTL) to a less than significant level with implementation of mitigation along the gen-tie/transmission interconnections and access road. It is also preferred for rare plants. While it is found to be potentially feasible and to meet most project objectives, a portion of the substation is on private property. Therefore, decision makers will evaluate the potential for project delay based on the potential requirement for negotiations with private landowners and possible condemnation proceedings, which could affect SCE's operational timeline objective. Also, approval would be required by the Palo Verde Land and Water Company due to reservation rights on the property.

Otherwise, the **Southern Alternative would also be environmentally superior should Avoidance Alternative #1 create significant delays that would affect its ability to meet project objectives and be feasible**. The Southern Alternative and the transmission interconnections would be located entirely on public (BLM) land. The Southern Alternative would reduce significant impacts to biological resources to less than significant with the implementation of mitigation along the gen-tie/transmission interconnections and access road. It is less environmentally preferred than Avoidance Alternative #1 because it has the potential to impact desert washes and desert kit foxes; however, these impacts would be less than significant with mitigation.

Although the Southern Alternative # would also impact a slightly greater number of unevaluated cultural resources, all of the cultural resources documented on both the Southern Alternative and Avoidance Alternative #1 sites likely are ineligible for the National Register of Historic Places (NRHP) (a deter-

mination from the BLM is required for a final eligibility evaluation). Because it is unlikely that any of the sites will be determined to be eligible, and if any sites are determined eligible, mitigation would likely reduce impacts to a less-than-significant level, the Southern Alternative and Avoidance Alternative #1 would have largely similar cultural resources impacts.

Avoidance Alternative #2 and Avoidance Alternative #3 would also both reduce significant impacts to biological resources to less than significant with the implementation of mitigation along the gen-tie/transmission interconnections and access road. However, these sites would also still affect some lower quality MFTL sand dune habitat within the site footprints, so they are less preferred than Avoidance Alternative #1 and the Southern Alternative. Avoidance Alternative #2 is preferred to Avoidance Alternative #3, because it would impact the fewest documented cultural resources and the gen-tie interconnections would be slightly shorter creating slightly less ground disturbance. Avoidance Alternative #3 would also impact one desert wash.

Table F-1. Comparison of CRS Alternative Sites

	Proposed CRS	Partial Avoidance Alternative	Avoidance Alternative #1	Avoidance Alternative #2	Avoidance Alternative #3	Southern Alternative
Land Ownership: Substation Site	BLM	BLM	BLM and Private	Private	BLM	BLM
Land Ownership: Transmission/Gen-Tie Lines*	BLM	BLM and Private	BLM and Private	BLM and Private	BLM and Private	BLM

COMPARISON OF ISSUE AREAS WITH SIGNIFICANT/UNMITAGABLE IMPACTS

Biological Resources: MFTL/Sand Dune Habitat (Substation Site)	<ul style="list-style-type: none"> • Significant & Unmitigable • 98 acres direct and 1,365 acres indirect impacts 	<ul style="list-style-type: none"> • Reduced impacts, but potentially still Significant & Unmitigable • 90 acres direct & 855 acres indirect impacts • Access road as well as transmission interconnections on northwestern side may also impact corridor, but impacts would be less than significant with mitigation 	<ul style="list-style-type: none"> • Environmentally Superior • Impacts less than significant and no MFTL mitigation likely required on the substation site • Access road as well as transmission interconnections on northwestern side may impact corridor, but impacts would be less than significant with mitigation 	<ul style="list-style-type: none"> • Reduced impacts • 30 acres of MFTL habitat directly affected by site, but not within sand dunes and would be less than significant • Access road and transmission interconnections construction in dune habitat would be less than significant with mitigation 	<ul style="list-style-type: none"> • Reduced impacts; • 45 acres of MFTL habitat directly affected, but not within sand dunes and would be less than significant • Access road and transmission interconnections construction in dune habitat would be less than significant with mitigation 	<ul style="list-style-type: none"> • Environmentally Superior • Impacts less than significant and no MFTL mitigation likely required for the substation site • Slightly greater sand transport corridor impacts for access road and transmission interconnections from longer connections and additional tower footing(s); impacts would be less than significant with mitigation
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COMPARISON OF ISSUE AREAS WITH LESS THAN SIGNIFICANT IMPACTS

Biological Resources: Rare Plants	<ul style="list-style-type: none"> • 98 acres direct and 1,365 acres indirect impacts to sand dune-dependent rare plants (i.e., Harwood's eriastrum, Harwood's milkvetch, and flat-seeded spurge) • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Slightly reduced impacts to rare plants 	<ul style="list-style-type: none"> • Environmentally Superior • Impacts substantially reduced to only 10 acres of impact for access road construction/widening 	<ul style="list-style-type: none"> • Reduced impacts to rare plants • Not observed, but 20 acres of suitable habitat exists 	<ul style="list-style-type: none"> • Slightly reduced impacts to rare plants 	<ul style="list-style-type: none"> • Environmentally Superior • Impacts substantially reduced to only 10 acres of impact for access road construction/widening
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Table F-1. Comparison of CRS Alternative Sites

	Proposed CRS	Partial Avoidance Alternative	Avoidance Alternative #1	Avoidance Alternative #2	Avoidance Alternative #3	Southern Alternative
Biological Resources: Desert Tortoise/Creosote Scrub	<ul style="list-style-type: none"> • Environmentally Superior • Low potential to occur in sandy habitat 	<ul style="list-style-type: none"> • Slightly Increased, but less than significant with mitigation • 10 acres of direct impacts to creosote scrub 	<ul style="list-style-type: none"> • Increased, but less than significant with mitigation • 90 acres of direct impacts to creosote scrub 	<ul style="list-style-type: none"> • Increased, but less than significant with mitigation • 70 acres of direct impacts to creosote scrub 	<ul style="list-style-type: none"> • Increased, but less than significant with mitigation • 45 acres of direct impacts to creosote scrub 	<ul style="list-style-type: none"> • Increased, but less than significant with mitigation • 90 acres of direct impacts to creosote scrub
Biological Resources: Desert Washes	<ul style="list-style-type: none"> • Environmentally Superior • No State jurisdictional desert washes onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No State jurisdictional desert washes onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No State jurisdictional desert washes onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No State jurisdictional desert washes onsite. 	<ul style="list-style-type: none"> • One State jurisdictional desert wash • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Numerous <u>potentially jurisdictional</u> desert washes onsite • Impacts less than significant with mitigation
Biological Resources: Desert Mammals	<ul style="list-style-type: none"> • Environmentally Superior • No desert kit fox or other mammalian burrows documented onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No desert kit fox or other mammalian burrows documented onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No desert kit fox or other mammalian burrows documented onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No desert kit fox or other mammalian burrows documented onsite. 	<ul style="list-style-type: none"> • Environmentally Superior • No desert kit fox or other mammalian burrows documented onsite. 	<ul style="list-style-type: none"> • Active kit fox complex & other mammalian burrows onsite • Impacts less than significant with mitigation
Cultural Resources*	<ul style="list-style-type: none"> • 7 documented resources (4 unevaluated & 3 isolates) • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources. 	<ul style="list-style-type: none"> • Similar or slightly preferred • 6 documented resources (4 unevaluated & 2 isolates) • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources. 	<ul style="list-style-type: none"> • Slightly greater impacts • 6 unevaluated resources documented • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources. 	<ul style="list-style-type: none"> • Environmentally Superior • 4 unevaluated resources documented • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources. 	<ul style="list-style-type: none"> • Greater impacts • 15 unevaluated resources documented • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources. 	<ul style="list-style-type: none"> • Greater impacts • 13 documented resources (10 unevaluated & 3 isolates) • Resources centrally located • Potentially significant & unmitigable impacts to TCPs, if identified,** as well as other known and unknown resources.
Ground Disturbance/Gen-Tie Length	<ul style="list-style-type: none"> • Environmentally Superior 	<ul style="list-style-type: none"> • Environmentally Superior 	<ul style="list-style-type: none"> • Slightly increased 	<ul style="list-style-type: none"> • Increased 	<ul style="list-style-type: none"> • Increased 	<ul style="list-style-type: none"> • Slightly Increased
Hydrology and Water Resources	<ul style="list-style-type: none"> • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Similar to proposed CRS • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Similar to proposed CRS • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Similar to proposed CRS • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Similar to proposed CRS • Impacts less than significant with mitigation 	<ul style="list-style-type: none"> • Similar to proposed CRS • Impacts less than significant with mitigation

Table F-1. Comparison of CRS Alternative Sites

	Proposed CRS	Partial Avoidance Alternative	Avoidance Alternative #1	Avoidance Alternative #2	Avoidance Alternative #3	Southern Alternative
Greenhouse Gas	<ul style="list-style-type: none"> • Significant & unmitigable impacts from cumulative GHG emissions 	<ul style="list-style-type: none"> • Similar to proposed CRS • Significant & unmitigable impacts from cumulative GHG emissions 	<ul style="list-style-type: none"> • Similar to proposed CRS • Significant & unmitigable impacts from cumulative GHG emissions 	<ul style="list-style-type: none"> • Similar to proposed CRS • Significant & unmitigable impacts from cumulative GHG emissions 	<ul style="list-style-type: none"> • Similar to proposed CRS • Significant & unmitigable impacts from cumulative GHG emissions 	<ul style="list-style-type: none"> • Similar to proposed CRS • Significant & unmitigable impacts from cumulative GHG emissions

* The revised routing of the 220 kV gen-tie interconnections to an alternative site would be executed by NextEra and Solar Millennium for GSEP and BSPP, respectively, which would determine the affected land owners.

** The BLM, as the federal Lead Agency under NEPA and Section 106 of the NHPA, has initiated required government-to-government consultation with appropriate Native American groups and notification to other public groups regarding project effects on traditional cultural values. During scoping for the proposed substation modifications, the CPUC, as CEQA Lead Agency, also contacted local tribes and individuals identified by the NAHC to elicit concerns about cultural resources that could be potentially impacted by the Proposed Project (see Appendix 4). Thus far, no TCPs have been identified in the vicinity of the Proposed Project or alternative sites.

F.4.2 Definition of Environmentally Superior Alternative

The conclusions in Section F.4 for the alternatives evaluated result in identification of Avoidance Alternative #1 as the environmentally superior alternative. This alternative is found to be potentially feasible and to meet most project objectives. However, if Avoidance Alternative #1 is found to cause significant schedule delays that would affect its ability to meet SCE's operational timeline objective for interconnection with BSPP and GSEP, then the decision makers will evaluate whether it is a feasible alternative (see discussion in Appendix 1, Alternatives Screening Report).

The environmentally superior substation site is illustrated in Figure C-1 in Section C of this SEIR.

F.5 No Project Alternative vs. the Environmentally Superior Alternative

The No Project Alternative is described in Section C.6, and certain consequences can be identified without undue speculation. The absence of the Proposed Project would likely lead SCE or the solar project developers to pursue other actions to achieve the objectives of the Proposed Project. The events or actions that are reasonably expected to occur in the foreseeable future without the CRS expansion include the following:

- The approved 500 kV transmission from Colorado River Substation to Devers Substation would be constructed as already approved by the CPUC (and as anticipated to be approved by the BLM).
- The approved solar power projects (BSPP and GESP) would have substantial delays in their online dates because their projects would have to be re-designed and the changes re-evaluated under CEQA and NEPA due to the need for substantially larger and more inefficient infrastructure. Specifically:
 - The BSPP project would likely have to be re-designed to incorporate a larger on-site substation and a 500 kV gen-tie line, rather than a 230 kV gen-tie line to the expanded CRS substation, in order for BSPP to interconnect to the regional transmission system. The additional cost of this larger substation and the delays associated with CEQA and NEPA review of the changes may affect the financial viability of the project and its ability to qualify for financing.
 - The approved GSEP project would use an existing 230 kV transmission line along much of the route between the Genesis solar project site and the CRS. In the No Project scenario, both a larger on-site substation and a new, additional 500 kV line would have to be installed (rather than the current approved plan, which would require only installation of a second circuit onto existing 230 kV towers). Additional environmental review would be required by the BLM and CEC to evaluate these modifications under CEQA and NEPA. An expanded right-of-way would be required for the additional 500 kV line.

SCE, Western Area Power Administration, or the solar generators may pursue the expansion of an existing substation in the Blythe area (the Buck and Blythe Substations are located near the Blythe power plant). This expanded substation could transform the gen-tie lines from 230 to 500 kV, and then a new 500 kV line would be constructed to the CRS. The substation expansion and the revised transmission line route and size would require NEPA and CEQA analysis to define impacts and mitigation.

Because the CPUC has already approved construction of a 44-acre substation at the proposed location for the California-only portion of DPV2, the No Project Alternative includes construction of the originally-approved 44-acre DSW Midpoint Substation, but not the expanded area. Therefore, the No Project Alternative would locate the substation in the active sand transport corridor, but it would have fewer direct and indirect impacts than those of the Proposed Project and the Partial Avoidance Alternative due to its smaller size. In addition, the environmental impacts of the No Project Alternative would also result

from new transmission lines and substation expansion at other locations. These long-term operational impacts include visual impacts of the new transmission lines and substation expansions depending on their locations in more developed areas, which could result in significant impacts elsewhere.

Therefore, because the No Project Alternative could also require construction of additional and higher voltage transmission lines and substation expansions with impacts similar to those described for the Proposed Project, the No Project Alternative is not found to be superior to the Environmentally Superior Alternative as defined in Section F.4.2 above.