

Comment Set C01 Brendan Hughes

DPV2 Colorado River Substation Expansion Project Supplemental EIR Team

From: Brendan Hughes [jesusthedude@hotmail.com]
Sent: Tuesday, April 05, 2011 12:47 PM
To: dpv2@aspeng.com
Subject: Comments on Colorado River Substation Draft Supplemental EIR

To whom it may concern:

My name is Brendan Hughes and I would like to comment on the proposed Colorado River Substation along the Devers-Palo Verde transmission line. The CPUC and BLM should deny SCE's application because it will have several negative impacts on the desert. First, it will have unmitigable impacts on sensitive species, such as the Mojave fringe-toed lizard, and may even have impacts on the federally threatened desert tortoise. The site is outside of critical habitat for the tortoise, but only a few miles from it. Also, the destruction of irreplaceable cultural resources will occur to build this project. These impacts are unacceptable. Finally, building this substation will facilitate the large-scale destruction of the Chuckwalla Valley by industrial solar plants. This is unnecessary when plenty of rooftops at load centers are available for solar panels, and when thousands of acres of significantly degraded lands are available for solar use. This substation is unnecessary and destructive, and therefore should not be built.

C01-1

C01-2

C01-3

Thank you for your consideration.

Brendan Hughes
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Responses to Comment Set C01

Brendan Hughes

- C01-1 The commenter's opposition to the project is noted. The severity of impacts noted by the commenter is consistent with the MFTL and desert tortoise impact analyses presented in Section D.2 of the Draft SEIR. The proposed project site is approximately 3 miles east of the Chuckwalla Critical Habitat Unit for desert tortoise.
- C01-2 The commenter's concern about the destruction of irreplaceable cultural resources is noted. The project's effect on cultural and resources within the project area is identified and evaluated in Section D.3 (Cultural Resources) of the Final Supplemental EIR. To date, formal evaluations have not been conducted to determine whether any of the identified cultural resources qualifies for National Register listing. In compliance with the regulations implementing the NHPA, found at 36 CFR Part 800, a Programmatic Agreement will guide the evaluation of historic properties (if any) that will be affected by the project, and for resolving adverse effects using measures consistent with their values, prior to construction or other activities that could affect them. The PA will be completed and signed prior to approval of the ROD. Consulting parties and stakeholders, including the State Historic Preservation Officer and Indian tribes, will have an opportunity to participate in consultations on the terms and provisions of the PA before the project is approved and to consult and provide input during all phases of implementation of the PA. Mitigation measures described in Section D.3 of the DSEIR will be incorporated into the provisions of the PA to ensure that impacts to any identified historic properties within the selected alternative are avoided, minimized, or mitigated.
- C01-3 The commenter states that building the substation would facilitate the destruction of the Chuckwalla Valley by industrial solar plants. Furthermore, it states that degraded lands are available for solar use and rooftops at load centers are available for solar use.
- Please refer to Response to Comment B07-19 for a discussion of the growth inducing impacts of the CRS expansion. With regard to consideration of rooftop PV as an alternative to the CRS expansion, please see Responses to Comments B07-1 and B07-2. Furthermore, as discussed in Response to Comment B07-1 regarding rooftop PV, the commenter's suggestion regarding the use of degraded lands elsewhere for solar does not meet two out of three of the project objectives. While it would meet the project objective to help California meet its renewable energy goals, it would not meet either of the other two project objectives listed in Section A.1.3 of the Final Supplemental EIR. These objectives are to provide transmission access to potential future renewable resources in the Blythe area and to complete the substation in a timely manner to serve other approved solar projects in the Blythe area. An EIR need not consider alternatives that do not meet most of the project objectives.