



0000073464

ORIGINAL

Southern California Edison Company
L-00000A-06-0295-00130

OPEN MEETING AGENDA ITEM

From: roundriver@gmail.com on behalf of Daniel R. Patterson [swpeer@peer.org]
Sent: Tuesday, May 29, 2007 10:27 AM
To: Gleason-WebEmail; Mayes-WebEmail; Mundell-Web; Hatch-WebEmail; Pierce-Web
Cc: lfaeth@az.gov; bbrooks@az.gov; Sandy Bahr; krlsss1 Ron Kearns; Paul_Cornes@fws.gov; Cary Meister; Refugekeeper; Kelly Fuller; Kondor, Rachel; stevtabor@aol.com; Terry Weiner; Donna and Larry Charpied; todd@tjsafari.com; jwilliams@azwild.org
Subject: PEER urges 'no' on Devers-Palo Verde powerline

Arizona Corporation Commission
 Commissioners Wing
 1200 W. Washington - 2nd Floor
 Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

MAY 29 2007

DOCKETED BY	NR
-------------	----

RECEIVED
 2007 MAY 29 P 3:47
 AZ CORP COMMISSION
 DOCKET CONTROL

Dear Chairman Gleason and Commissioners:

PEER is a national non-profit alliance of local, state and federal scientists, law enforcement officers, land managers and other professionals dedicated to upholding environmental laws and values. We have our southwest office in Tucson.

PEER is writing to ask that the Arizona Corporation Commission **reject the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line Project**. It is not in the broader public interest. This proposed line will bring little, if any, benefits to Arizona rate payers and in fact is likely to result in increased rates for Arizonans, while at the time doing significant environmental harm. The proposed line is clearly incompatible with the KOFA National Wildlife Refuge as was determined by the Refuge manager, and would also negatively impact other sensitive public lands in our state.

This transmission line is contrary to the National Wildlife Refuge System mission and would hinder the efforts of the Refuge staff to meet the mandates of that mission. A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV line is incompatible with the mission of the Refuge.

The Right-of-Way through KOFA is through prime desert bighorn sheep and desert tortoise habitat. The potential effects of another power line on bighorn sheep, especially on movement across the power line right-of-way and during the lambing period, are clearly contrary to the purposes for which the refuge was established. Considering that the population of sheep in the area is estimated to be down to 390 animals, a drop of approximately 230 animals from 2003 and down from 812 animals in 2000, it is prudent to be cautious about introducing further disturbances.

In addition, potential impacts to reptiles, either attempting to cross roads or no longer able to cross the right-of-way because of its width, and migratory birds striking the power lines are also clearly contrary to the purposes of the refuge and its management mandates.

5/29/2007

ne line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the Refuge. Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. Adding additional industrial features to the landscape is a significant adverse visual change. The project would change the character of the KOFA and significantly diminish its recreational value as well.

The Final Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") on this proposed project indicates clearly that the impact of the DPV2 transmission line on the Kofa will be irreparable and unmitigable. According to the EIR/EIS, the negative visual impacts in the Kofa National Wildlife Refuge would be significant and unmitigable (page ES-41).

The project would change the character of the KOFA National Wildlife Refuge and significantly diminish its recreational value as well. On page D.5-22 of the Final EIR/EIS, it states:

"Overall, development and operation of the project would change the character of the Kofa NWR and significantly diminish its recreational value. Impacts to the Kofa NWR would be significant and unmitigable (Class I)."

The Power Plant and Line Siting Committee was charged with reviewing a number of factors including the total environment of the area, fish, wildlife and plant life and associated forms of life upon which they are dependent, existing scenic areas, and more, and it is to "give special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species." There is no doubt that the KOFA is unique and should be given special consideration.

The DVP2 is unnecessary for an adequate, economical and reliable supply of electric power for Arizona and would cause significant damage to our precious Arizona public lands. It is clear that the benefits of this project to Arizona and Arizona ratepayers are limited, at best, and that the environmental impacts are significant. Because of this, **PEER strongly urges the Arizona Corporation Commission to reject the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line.**

Thank you,

Daniel R. Patterson
Ecologist & Southwest Director
Public Employees for Environmental Responsibility (PEER.org)

20.906.2159
38 N. 5th Av. #210; POB 172, Tucson AZ 85702-0172 USA

PEER protects employees who protect our environment.

11/29/2007