



DESERT TORTOISE COUNCIL

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Via email only

Attn: Stephen Razo, Greg Miller
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RE: Scoping comments for Eagle Crest Pumped Storage Project in Riverside County

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its historical range.

We see in the recent news release (CA-CDD-15-51) that limited information is given regarding the site location for the transmission line; only that there will be "approximately 12 miles of transmission and gen-tie line for the transmission of energy associated with the Eagle Crest Pumped Storage Project" that the "project area is approximately 30 miles west of Blythe, California, and ranging from 5 miles north of Interstate 10 at Desert Center, crossing the interstate from north to south and terminating at the Southern California Edison Red Bluff substation." We appreciate this opportunity to provide scoping comments on the above-referenced project, which follow.

1. First, it is not clear from the news release if there are any alternate corridors available to connect the facility with the Red Bluff substation. Since all areas south of Interstate 10 in this area were designated as desert tortoise critical habitat by the U.S. Fish and Wildlife Service (USFWS 1994), we feel strongly that a minimum of three alternative corridors must be surveyed to see which one(s) would result in the fewest impacts to tortoises and smallest impacted area of critical habitat. We strongly recommend that the transmission corridor follow existing route(s) and that no new roads are created. Surveys of all alternatives must conform to USFWS (2010) protocol, and include both appropriate action areas and zone of influences, as identified therein. These surveys should only be performed after the consultant has conferred with USFWS and California Department of Fish and Wildlife (CDFW) on the appropriate survey methodology and scope.

2. Has the pump facility already been approved in a record of decision by the U.S. Bureau of Land Management? If not, herein we register our opposition to the pump facility. We know from previous surveys performed by several of our Board members in the 1990's when the site was proposed as the Eagle Mountain Landfill that tortoises occur there and would be affected by development of the facility. We are also concerned with the proximity of the proposed facility to Joshua Tree National Park and the potential to undermine conservation of desert tortoises by the National Park Service within the Park if the facility is developed.

3. Has BLM already considered the potential for the pump facility to subsidize raven populations in the area, which could be a detrimental impact to tortoises occurring in the region? In any case, BLM's environmental document must consider mitigation measures to be implemented to avoid common raven nesting on the new transmission line, regardless of the alternative location chosen. There should be detailed descriptions of how the project proponent will ensure no raven nesting on any new transmission towers and associated facilities.

4. The news release indicates the BLM intends "to prepare a resource plan amendment with an associated environmental assessment" and that the "environmental assessment will tier to the 2014 Final Environmental Impact Statement prepared by the Federal Energy Regulatory Commission for the Eagle Crest Pump Storage Facility." Why isn't the BLM considering either an Environmental Impact Statement (EIS) or Supplemental EIS for the transmission line? Since the transmission line will ostensibly cross through critical habitat and, with the information provided, there is no guarantee it will follow existing corridors or roads, we consider either an independent EIS or Supplemental EIS to be more appropriate than an EA.

Finally, we ask that the Council be considered an Affected Interest for this and any other project that may affect the desert tortoise where the BLM serves as the federal lead agency.

Regards,



Edward L., LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

Literature Cited

U.S. Fish and Wildlife Service. 1994. Endangered and threatened wildlife and plants; determination of critical habitat for the Mojave population of the desert tortoise. Federal Register 55(26):5820-5866. Washington, D.C.

U.S. Fish and Wildlife Service. 2010. Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*). USFWS Desert Tortoise Recovery Office. Reno, NV.