

CHAPTER 5
COMMENTS AND RESPONSES
TO THE DEIS/DPA

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**U.S. Environmental
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Region IX** San Fancisco, California C-10
Deanna M. Wieman

**U.S. Fish and Wildlife Service
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Branch of Federal Activities** Washington D.C. C-11
Richard M. Smith

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Stanworth, Rex	Delta
Van Ee, Jeff	Las Vegas
Maichle, Bob	Las Vegas
Breekey, David	Las Vegas

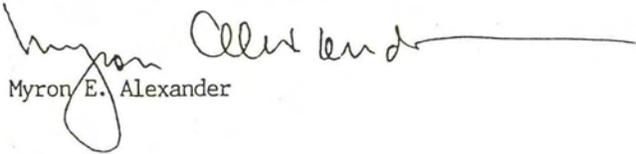
**COMMENT LETTERS AND
RESPONSES FROM INDIVIDUALS**

LETTER #A-1
COMMENTS

B (5) As many as 50 to 125 archaeological and/or historical resource sites (No inventory has been made!) are in the direct path of the powerlines and will be destroyed or at best disturbed.

C I wish to state that in my opinion the Environmental Impact Statement is weak and does not deal with specifics regarding the economic justification for the powerline ~~at~~ or demonstrate and substantiate any real need for this extra power carrying capacity.

SINCERELY.


Myron E. Alexander

RESPONSES

C Please refer to Chapter 3 of this document for an expanded discussion of the purpose and need.

LETTER #A-2
COMMENTS

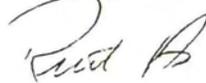
8/21/92

Dear Mr Simonson

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan Amendment, I am in favor of the preferred Alternate power line route. I have volunteered many hours with the BLM in the past few years.

Thank you for your attention in this matter,

Sincerely,



Ruth Ax
3606 Villa Knolls
Las Vegas, Nv 89120

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

LETTER #A-3
COMMENTS

RESPONSES

Box 163
Silver Creek Ranch
Baker, Wv. 89311
September 4, 1992

Your comments are noted and will be considered in the BLM's decision process. Also refer to Electric and Magnetic Fields on page 3-72 of the SWIP DEIS/DPA and Recent EMF Research Results in Chapter 3 of this document on page 3-19.

Dear Ms. Simonson,

We received your draft EIS on the Southwest Antitox Project. Thanks for designing it, so one found it readable.

My concern is having a 500 KV line through our property when we already have two 230KV lines in place.

One can hear a noise from these lines at any given time not knowing what amount of leakage is let down or the type or kinds of damage

LETTER #A-3
COMMENTS

RESPONSES

This may cause people, animals
plants or soil, there is a concern
for our families health and the
health of those in the years to
come.

With a wilderness to one
side, a National Park on the other
side of our home and where
we make our living why
should we have to live and
work with two 250KV lines
and one 500KV.

This would not be done
in a residential area.

Sincerely,

Sheridan Baker

2 of 2

SEP 8 3 24 AM '78
DISPATCH UNIT
RUBEN

LETTER #A-4
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

9 September 1992
2903 Valmere Drive
Malibu, Ca. 90265

Karl Simonson
BLM, Burley District Office
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

I'd like to request that you oppose the Southwest Intertie Project.

It seems to me that if the powerline is really needed, it should be built along the existing right-of-way in lines already strung between Utah and Las Vegas.

I visit the area around Pahranaghat Valley and the Great Basin National Park area at least four times yearly and enjoy the scenic, uncluttered skyline. One can really feel away from the clutter of L.A. and civilization out there when I and my family visit this area on our vacations.

LETTER A-4

LETTER #A-4
COMMENTS

RESPONSES

It seems so unnecessary, that there's already so many reminders of the city, industry, etc. all over our open expanses already without impacting our wildlife (desert tortoise & raptors) and human visitors to these beautiful lands.

Thank you, Mr. Alterio Burke & Family

LETTER #A-5
COMMENTS

NEVADA LAND & CATTLE CO.
BIG SPRINGS RANCH
OASIS, NEVADA 89835

SEPTEMBER 18, 1992

MR. KARL SIMONSON
BUREAU OF LAND MANAGEMENT
BURLEY DISTRICT OFFICE
ROUTE 3 BOX 1
BURLEY, IDAHO 83318

DEAR MR. SIMONSON:

I AM WRITING TO ADDRESS OUR CONCERNS RELATIVE THE DRAFT ENVIRONMENTAL IMPACT STATEMENT/DRAFT PLAN AMENDMENT ON THE PROPOSED IDAHO POWER COMPANY 500 KV TRANSMISSION LINE, THE SOUTHWEST INTERTIE PROJECT.

WE ARE PRESENTLY THE LEASEHOLDER ON THE BIG SPRINGS RANCH WHICH IS OWNED BY CSY INC. THE HEADQUARTERS OF THE RANCH IS SITUATED JUST SOUTH OF OASIS, NEVADA IN THE IMMEDIATE PROXIMITY OF THE PREFERRED ALTERNATIVE ROUTE OF THE TRANSMISSION LINE. THE SEGMENTS OF ROUTE A THAT IMPACT OUR OPERATION ARE NUMBERED 200 AND 211 ON THE ALTERNATIVE ROUTES MAP.

THE DRAFT EIS DOES NOT ADDRESS THE NEGATIVE IMPACT IT WOULD HAVE TO THE DEVELOPMENTS AND RESIDENTS OF THE WEST SIDE OF GOSHUTE VALLEY. IN FACT IT FAILS TO EVEN RECOGNIZE OUR EXISTENCE ACCORDING TO PAGE 8 AND 3-34 OF THE DRAFT. THE COMMUNITY OF OASIS SHOULD BE CONSIDERED AS MUCH AS, OR MORE OF, A POPULATION CENTER/RESIDENTIAL AREA AS CONTACT AND CURRIE.

RESPONSES

A The community of Oasis was inadvertently not listed on pages 8 and 3-34 of the SWIP DEIS/DPA. This error is corrected in the Errata in Chapter 4 of this document. Oasis was, however, considered in the impact assessment and is documented in the Volume III - Human Environment Technical Report and the SWIP DEIS/DPA Map Volume.

The development plans for Northern Holdings would have been included in the impact assessment had they been made public or been on file with the county. There was also no mention of these developments during the public scoping meetings held in March 1989, during the public planning workshop held on January 8, 1991 (attended by representatives of Big Springs Ranch), or in response to the numerous newsletters mailed to Big Springs Ranch throughout the over three-year EIS process. Future planned developments by Northern Holdings have been considered in the SWIP FEIS/PPA (refer to Impacts to the Oasis Area in Chapter 3 of this document).

LETTER #A-5
COMMENTS

B [ALSO WE HAVE A PRIVATE AIRSTRIP JUST EAST OF THE RANCH HEADQUARTERS WHICH WAS NOT IDENTIFIED IN THE DRAFT AND IS SITUATED CLOSE TO THE PROPOSED ROUTE.

C [THE CULTURAL VALUE OF THE IMMIGRANT TRAIL ROUTE THROUGH GOSHUTE VALLEY WAS NOT ADDRESSED IN THE PLAN. WHAT IS NOW THE BIG SPRINGS RANCH HEADQUARTERS WAS AN IMPORTANT STOPPING POINT FOR THE DONNER PARTY AS WELL AS MANY OTHER IMMIGRANT PARTIES, AND PUBLIC INTEREST IN THESE ROUTES IS CONSIDERABLE. WE HAVE HOSTED A NUMBER OF GROUPS THAT WERE FOLLOWING THESE VARIOUS IMMIGRANT TRAILS.

WE ARE OPPOSED TO SEGMENTS 200 AND 211 OF THE PREFERRED ALTERNATIVE-ROUTE A, FOR THE FOLLOWING REASONS:

D [1. THE NEGATIVE VISUAL IMPACT TO THE RANCH HEADQUARTERS WOULD BE SUBSTANTIAL. THE JUSTIFICATION YOU HAVE GIVEN US FOR PREFERRING THE ROUTE ON THE EAST SIDE OF THE VALLEY IS ONE OF VISUAL IMPACT TO I-80. THE LOCAL RESIDENTS WHO LIVE AND WORK IN THIS AREA SHOULD BE CONSIDERED MORE IMPORTANT THAN THE FREEWAY TRAFFIC.

E [2. THE FUTURE PLANS OF CSY INC. FOR THE DEVELOPMENT OF THEIR PRIVATE LAND IN GOSHUTE VALLEY WOULD BE HEAVILY IMPACTED. THE PROPOSED ROUTE CUTS RIGHT THROUGH THE CENTER OF THE MOST PRODUCTIVE PART OF THE VALLEY.

F [3. ALTHOUGH THERE SEEMS TO BE CONFLICTING RESEARCH RELATIVE THE HAZARDS OF THE ELECTRIC AND MAGNETIC FIELD EFFECTS OF TRANSMISSION LINES, WE WOULD PREFER NOT TO BE EXPOSED TO THE POTENTIAL HAZARDS THAT EXIST.

RESPONSES

B Please refer to Chapter 4, Figure 4-4 of this document for a map of this airstrip in relation to the alternative routes and a discussion of the potential impacts.

C Historic data the BLM reviewed revealed that major historic immigrant wagon trails were networks of tracks with many minor variations and alternate routes--not simple two-track roads. Many of the details regarding the routes of the trails and their variations, as well as distinguishing subsequent uses of these transportation corridors, have yet to be documented. It is possible that what is now the Big Springs Ranch Headquarters may have been a stopping point on one of the variations of the Hastings Cutoff Trail; the historic data we reviewed indicate that this cutoff, which was followed by the Donner party, was located in the Shafter vicinity some five miles south of the Big Springs Ranch Headquarters.

D Visual impacts were assessed from Big Springs Ranch and all other residences along the alternative routes. It is true that residences are more visually sensitive than travelers on Interstate 80, and this was part of the criteria used in assessing visual impacts. Table VR-7 of Volume III - Human Environment Technical Report documents that all residences were considered to have high visual sensitivity while travelers on Interstate 80 received a moderate visual sensitivity rating (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

E CSY Development's intent to develop within the valley was not disclosed to the BLM until the public meeting in Wells on August 4, 1992. Conceptual development plans have now been received from CSY Development and are incorporated into analysis (refer to Impacts in the Oasis Area on page 3-36 of this document).

F EMFs are an especially difficult issue and conclusive results may not be known for years. Refer to the EMF sections in Chapters 3 and 4 of the SWIP DEIS/DPA and Recent EMF Research section on page 3-19 of this document for more information.

LETTER #A-5
COMMENTS

RESPONSES

WE UNDERSTAND AND CONCUR WITH THE IMPORTANCE OF THE SWIP PROJECT.
THE JUSTIFICATION FOR THE PREFERRED ROUTE IS NOT VALID HOWEVER
AND WE ARE ANIMATELY OPPOSED TO SEGMENTS 200 AND 211 OF ROUTE A.
THERE IS A ROUTE THE LINE COULD FOLLOW THAT WOULD HAVE MUCH LESS
IMPACT TO THE VALLEY AND WE HAVE SHOWN IT ON THE ENCLOSED MAP.

YOUR CONSIDERATION FOR OUR CONCERNS IN THIS MATTER ARE
APPRECIATED.

SINCERELY YOURS,



BOB BARTON
NEVADA LAND & CATTLE CO.

LETTER #A-6
COMMENTS

September 8, 1992
236 B Frisbie St
Oakland, CA 94611

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, ID 83318

Dear Mr. Simonson,

This letter concerns the proposed 500 Volt powerline from Idaho to Las Vegas.

I am appalled at this proposal. Please select the "NO ACTION" alternative to safeguard the PUBLIC lands.

A [No powerline should be built through the unspoiled desert valleys as proposed without dire need. The justification for this project is very weak. "Marketplace" power brokering does not create any new power. Moreover, in this market, existing power transfer capacity is already adequate.

If any new power transfer capacity is needed, it should be added to existing right of ways. Such an incremental change would have far less visual impact than the proposal in question. As a lover of the open spaces of Nevada, I can tell you that these undeveloped valleys are a national treasure. There's just no need to destroy them for higher profits for power companies.

Please protect the nearly pristine viewsheds of the region.

Sincerely,
Fred Beddall
Fred Beddall

RESPONSES

A As stated in the revised Purpose and Need (refer to Chapter 3 of this document), there is a need for greater power transfer capacity because the SWIP would provide the ability to better utilize power resources that are currently available and push into the future the need to construct new generation resources. Open access to the power market means that many utilities would be able to compete for energy supplies. This competition would create market forces that tend to hold down price increases. It would also make it difficult for any utility to "broker" power since all utilities would have more open access to the market.

LETTER #A-7
COMMENTS

KARL SIMONSON
BUREAU OF LAND MANAGEMENT
BURLEY DISTRICT OFFICE

SEPTEMBER 15, '92
GRANT J. BLOCHER
6603 WHITNEY ST.
OAKLAND, CA 94609

Dear Mr. Simonson,

A I support the "NO ACTION" alternative to the proposed Southwest Intertie Project. The Environmental Impact Statement on the project does not justify the need for the line. In fact the existing line does not ~~not~~ operate at anything approaching capacity.

Needless to say we don't need any more power lines and towers marching across our dwindling open spaces. Besides this potential blight on the landscape there is a significant risk to the creatures that inhabit the area

RESPONSES

A Please refer to Purpose and Need in Chapter 1 of the SWIP DEIS/DPA and in Chapter 3 of this document. Also refer to page 2-31 of the SWIP DEIS/DPA for a discussion of how in early 1990 the IPCo discovered that the UNTP would be fully subscribed and would not have the capacity to fulfill the purpose and need of the SWIP. It was in July 1990 that the IPCo decided to expand the project south from the Ely area to Dry Lake.

Your other comments are noted and will be considered in the BLM's decision process.

LETTER #A-7
COMMENTS

RESPONSES

of the proposed route — the Desert Tortoise,
Hawks, eagles and other raptors, to name just
a few. Enough is enough!!!

The proposed route for the proposed power-
line will pass within spitting distance of our
new Great Basin National Park, and will have
a potentially devastating impact on an estimated
200 to 400 archeological and historical
sites! Please say NO to A.A. WATER & POWER! Thanks

Sincerely,
Frank J. Becker

LETTER #A-8
COMMENTS

September 18, 1992

Mr. Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

I am presently leasing pasture from Nevada Land & Cattle Co. in Goshute Valley and live on the Big Springs Ranch. I would like to make the following comments on the SWIP line that is proposed to run right through the ranch.

The proposed transmission line goes right through the pasture that I lease for breeding my heifers. From the information I have read concerning the effects of electric and magnetic fields on livestock, I am very much opposed to the line in this area.

A [The negative visual impacts to not only Big Springs Ranch, but to the whole western side of Goshute Valley would be devastating. In reading your draft EIS on the project it appears to me that you have not even considered the impacts to Big Springs or the people living in the Oasis area.

B [The only live water in this whole valley lies right in proximity to the proposed line. Therefore there is always a concentration of livestock in this area. This would be a problem not only from the possible effects on the livestock, but also in the construction of the line.

RESPONSES

A As stated in the SWIP DEIS/DPA, there will be visual impacts as a result of constructing the SWIP. Visual impacts were assessed from Big Springs Ranch, Oasis, and all other residences along the alternative routes. The Visual Resources section in the Volume III - Human Environment Technical Report documents in more detail the potential visual impacts to this area (refer to Appendix H of the SWIP DEIS/DPA for the locations where these reports can be reviewed).

B Adverse effects to water resources in the area of the Big Springs Ranch are not expected. The IPCo would work with the Big Springs Ranch to mitigate any effects to the cattle in the area during construction. The transmission line will span about 1/4 mile between towers and would be designed to avoid impacts to water resources (e.g., wetlands, streams, and springs). Overland access to construction sites would be done in this area to avoid adverse impacts.

The effects of EMF are inconclusive. Refer to Electric and Magnetic Fields on page 3-72 of the SWIP DEIS/DPA and Recent EMF Research in Chapter 3 of this document.

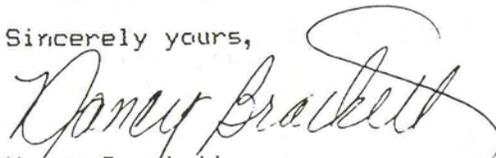
LETTER A-8

LETTER #A-8
COMMENTS

C The historical value of the West side of Goshute Valley has not been addressed in the draft EIS. The statement on page 3-91 referring to a single ethnohistoric area near Oasis is incorrect inasmuch as the area has many ethnohistoric areas.

In conclusion I would like to thank you for the opportunity to comment on this project. I am very opposed to the preferred route however and would like to see it on the other side of the valley.

Sincerely yours,



Nancy Brackett

RESPONSES

C The referenced paragraph identifies only one ethnohistoric locality in the vicinity of Oasis, but it is quite large encompassing some 4,000 to 5,000 acres. The paragraph also mentions other archaeological and historic sites recorded in the vicinity. However, the existing site files indicate that relatively few cultural resources have been recorded in this area. As along many segments of the evaluated alternative routes, this may very well reflect the lack of prior survey rather than absence of cultural resources. The sensitivity model developed to deal with these data gaps did not project high sensitivity zones on the west side of Goshute Valley. There will be complete surveys for cultural resources along the selected alternative route prior to construction. All sites discovered during these surveys will be mitigated.

LETTER #A-9
COMMENTS

RESPONSES

WILLIAM JAC SHAW
T. SCOTT BROOKE
KENNETH N. CALDWELL

BROOKE & SHAW
ATTORNEYS AT LAW
POST OFFICE BOX 2860
1590 FOURTH STREET
MINDEN, NEVADA 89423

TELEPHONE
(702) 782-7171
FAX
(702) 782-3081

18 September 1992



CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Carl Simonson
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley ID 83318

RE: Southwest Inter-tie Project

Dear Mr. Simonson:

This firm represents Nevada Big Springs, Inc. which is the owner of the real property in the vicinity of the Goshute Valley, Nevada, comprising what is commonly known as the Big Springs Ranch. This letter will constitute additional comments to the Draft Environmental Impact Statements and Draft Plan Amendment (DEIS/DPA) issued under cover of June 12, 1992 regarding the Southwest Inter-tie Project (SWIP). Verbal comments were presented at the meeting in Wells, Nevada on 4 August 1992, and such comments are incorporated herein by reference. The property involved is located within the area depicted on Panel 2 of the maps, generally to the north and south of Oasis, which is between Wendover and Wells, Nevada, on Interstate Highway 80.

As you will note, the Big Springs Ranch consists of in excess of one hundred thousand (100,000) acres of alternating sections in the Goshute Range and Goshute Valley, both north and south of Interstate Highway 80, together with allotment rights to various of the interspersed and adjacent sections. The ranch has been historically and consistently used for agricultural purposes, which continue to date and are expected to continue. Additionally,

LETTER #A-9
COMMENTS

since its acquisition in 1989, the current landowner has expended significant resources in a land planning program which is designed to expand the variety of uses and add significant residential and recreational uses to the property.

As you will also note, various of the studied alternate routes and all preferred routes pass directly through and significantly affect the Big Springs Ranch. Accordingly, the landowner has commented, and will comment herein, on the appropriateness of the designation of the alternative routes for study and construction. The landowner's main concerns relate to the process for identifying and selecting alternate study routes, and selecting the preferred route.

1. No reasonable notice was provided.

As stated at the BLM Hearing in Wells on 4 August 1992, the landowner first received actual notice of this entire project only within two (2) weeks of that date from its new ranch tenant. No prior written, verbal or telephonic notice of this process, or the presumed intended condemnation of its land, and subsequent construction of this significant powerline across its land, was ever given. Accordingly, the opportunity for and actual input by this landowner was effectively denied, resulting in the premature and improper rejection of any participation by this landowner.

The public notice which has been provided to date has clearly been inadequate in light of the lack of receipt of actual notice. Accordingly, it may be concluded that public notice provided was clearly not designed to and did not, give reasonable notice to this landowner of the activities undertaken and proposed.

It appears that the Big Springs Ranch constitutes the majority of the private land affected by this entire project. In light of the certain fact that the project manager or those involved with the project knew of the existence of this large landholding, and knew how actual notice could be given, and knew that no actual notice was given because of the lack of participation, one questions both the intent of effect of the notice procedures. As a result, this landowner has been denied the opportunity to participate and comment regarding selection of alternative study routes, and is relegated to commenting to previously dictated and adopted study routes and alternates.

RESPONSES

A We believe that the notification of the SWIP EIS process was adequate. A public scoping meeting was held in Wells in March 1989, a public planning workshop was held on January 8, 1991 (attended by representatives of Big Springs Ranch), and numerous newsletters were mailed to Big Springs Ranch throughout the over three-year EIS process. All the public meetings were announced in local newspapers and on posters (refer to Chapter 5 of the SWIP DEIS/DPA). There were also over 3,000 newsletters sent out announcing these meetings.

The SWIP DEIS/DPA states the preferred alternatives but does not presume to make a decision about condemnation of private lands at this point in the decision process. The landowners have clearly had an opportunity to attend the public meetings and to comment on the SWIP DEIS/DPA.

The public participation process was not designed to exclude participation by private landowners. In addition to the private land owners on the SWIP mailing list, the BLM also notified affected public land users. Private land owners in the area are generally also livestock permittees. By contacting the grazing permittees, many of the private land owners in the area are also contacted. Also, private land ownerships change with no notification to the BLM. The public planning workshop held in Wells on January 8, 1991 were attended by Mr. Bob Barton and Ms. Nancy Brackett of Big Springs Ranch. Numerous newsletters were mailed to Big Springs Ranch throughout the over three-year EIS process. Refer to Chapter 5 of the SWIP DEIS/DPA for a discussion of the public involvement process.

Your comment suggests that notification came from a new ranch tenant two weeks prior to the meeting in Wells on August 4, 1992. Mr. Bob Barton has leased the public lands since June 1, 1990. There is no information in the BLM's grazing case file to cause notification of anyone other than Mr. Barton of actions affecting the public lands within the allotment.

Refer to Chapter 2 of the SWIP DEIS/DPA for a discussion about the planning process to identify alternative routes. This planning process occurred over a several year period and numerous newsletters were sent to a mailing list of over 3,000 individuals, agencies, and organizations in order to gain public input, including input from the Big Springs Ranch. Alternative routes were discussed with the public during a series of public workshops in early 1991, as indicated above, and representatives of Big Springs Ranch did express concern for Link 211 at the Wells workshop on January 8, 1992.

LETTER #A-9
COMMENTS

A1 Due process requires more.

2. The selection of alternative routes was flawed.

In addition to the lack of notice which prevented participation in the selection of the study and alternate routes, it is clear that inadequate routing was studied regarding the Goshute Valley. Routes A, C, F and G all follow the same path, and will unnecessarily and improperly affect private property within the area, including the residents and landowners of Oasis, including this landowner, along its entire length. No satisfactory criteria or facts demonstrate the reasonableness of the selection of this route as the only study route through the Goshute Valley.

B As noted above, the Big Springs Ranch and the nearby community of Oasis comprise the overwhelming majority of the private land affected by the entire project. Common sense would dictate that private lands and populated areas and lands planned for future residential use would be avoided, and further, that a disruption of this magnitude would be limited to one side of the valley or the other. Instead, all studied routes seem specifically designed to impact as much private property and existing and future residential development as possible, while at the same time adversely impacting the scenic, visual and aesthetic resources of the valley, and all property within the valley by essentially bisecting the valley. The only apparent justification for this is that regarding a visual effect on motorists, but there is no distinction or justification made for creating this effect in the study routes, as opposed to any other potential areas.

Attached hereto as Exhibit 1 is a map showing the Big Springs Ranch holdings, and with an overlay indicating the preferred alternative route. As you will note by a review of the panel 2-jurisdiction map, in comparison with the map denoted panel 2-alternative routes, and by review of Exhibit 1 hereto, the preferred routes affect over fifteen (15) sections of land owned by this landowner. This route would require the condemnation in excess of fifteen (15) miles of private land owned by this landowner, and would also adversely affect the thousands of acres adjacent to this route owned by this landowner.

C These facts, opinions and effects are highlighted by the almost unanimous public comment received at the meeting in Wells on

RESPONSES

During the preparation of the SWIP DEIS/DPA there was no indication from Big Springs Ranch or Elko County that there were any development plans for this area. Link 211 was concluded to be the environmentally preferred route through this area. Conceptual development plans were received from CSY Development on October 7, 1992. The letter accompanying the concept plans stated a preference for Link 223 along the rail corridor and centered on the BLM's planning corridor. Links 221 and 223 now replace Link 211 in the Agency Preferred Alternative in this document (refer to Chapter 1 of this document).

B An extensive regional study was completed for this entire area and was coupled with the BLM's corridor studies completed during their Resource Management Plan process to plan a set of "reasonable and feasible" alternative routes. The regional study and alternative routes developed during this study were presented to the public during the scoping meetings in March 1989. Refer to Chapter 2 and Chapter 5 of the SWIP DEIS/DPA for a further discussion of the scoping process.

Private lands were not intentionally impacted by the routing alternatives. In fact, during the scoping process the public stated a preference for use of public lands over private lands for routing of alternatives. Private lands and environmental issues were both considered during development and refinement of the alternatives.

Visual impacts were adequately addressed and they do not overemphasize visual impacts of motorists using Interstate 80. Residences were considered the highest sensitivity viewpoints because of the long duration of views, while travelers on Interstate 80 received a moderate visual sensitivity rating. This was part of the criteria used in assessing visual impacts (refer to Table VR-7 of Volume III - Human Environment Technical Report). Refer to Appendix H of the SWIP DEIS/DPA for locations where the technical reports can be reviewed.

C Your comments are noted and will be considered in the BLM's decision process.

LETTER #A-9
COMMENTS

RESPONSES

C 7 August 1992, as well as the position taken by the Elko County Board of Supervisors at its meeting of 2 September, 1992. We trust that their written comments regarding this action have been duly received.

The map attached hereto as Exhibit "1" designates two (2) additional alternative routes which the area landowners and the county seek to have reviewed and studied. Both would generally relocate the proposed preferred route to the easterly side of the Goshute Valley, and along the existing transportation corridor within which the Northern Nevada Railroad is located. Alternative 2 would head easterly at a more northerly point, and result in less impact to Big Springs Ranch land in the Squaw Creek area.

This landowner, as well as all landowners in the area and Elko County, urges that these alternative routes be studied, and if found to be equal or superior in minimizing adverse impact, that one be adopted as the preferred route in this area.

3. The preferred route does not adequately address future impacts.

D Review of the DEIS/DPA clearly shows that the alternative routes were established based upon only existing land use, and that all design, study and review essentially ignored likely potential or future land uses. This is improper, since the overall use and value of the property owned by the landowner which will be affected by this project will be significantly reduced because of future impacts and the restriction on future use.

While we recognize that the diminution in value is a part of the compensation which must be paid in the event of condemnation, this is a separate issue from the impropriety of ignoring future use and effects in evaluating alternative routes for study and alternative routes for preference.

4. Summary.

The landowner of the Big Springs Ranch, the landowners in the adjoining community of Oasis, and Elko County have all commented and requested that an additional alternate route study be undertaken in the area of the Big Springs Ranch and Oasis. This consists of virtually all parties in the area who have an interest.

D Future land uses were considered in the planning process. The BLM was not aware of the planned development until the public meeting in Wells on August 7, 1992. The BLM would have included the development plans in the impact assessment had they been made public or been on file with Elko County. The BLM's data collection at Elko County and the BLM Elko District never turned up any evidence of this development.

The future planned developments by Northern Holdings and CSY Development have now been considered (refer to Impacts to the Oasis Area in Chapter 3 of this document).

LETTER #A-9
COMMENTS

RESPONSES

It is requested that the BLM authorize proper and thorough review of one or both of the alternate routes depicted on Exhibit 1. In the event of the adoption of one of such routes as the preferred route in the area, Nevada Big Springs, Inc. would not oppose the construction of the project.

We hope that you will take these comments into account in reviewing the DEIS/DPA. In particular, we hope that you will see fit to include additional studies along one or both of the routes suggested in Exhibit A, as a substitute for the preferred routes through the Goshute Valley.

Sincerely,

BROOKE & SHAW

By

T. Scott Brooke
T. Scott Brooke *med.*

TSB:aj
Enclosure

LETTER A-9

LETTER #A-10
COMMENTS

Aug. 28, 1992

Dear Mr. Simonson:

Please act to prevent the "Southwest Isotermic Project". No powerlines should be routed down our fast disappearing natural valleys & there is no need justification shown for such a line.

A Rather, already built-upon right-of-ways should be utilized to meet any future or demonstrated need for additional power lines. The BLM should be defending our open public lands against new encroachments.

B The flora & fauna of the area in question, are in need of the protection for which BLM exists. In addition to the flora & fauna in the area, Great Basin rattail & the invaluable archaeological & historical sites in the direct pass of the proposed powerlines, would be would be negatively impacted.

LETTER A-10

RESPONSES

A The SWIP will require a new right-of-way specific to a 500kV transmission line. It is not possible to utilize existing rights-of-way that were granted for other uses. These existing or designated corridors have other utilities in them and may be considered "already built upon rights-of way". The SWIP routing alternatives utilized designated or planning corridors whenever feasible in meeting the project needs.

The SWIP would require a 200-foot wide right-of-way which may or may not overlay other rights-of-way that may be within a designated corridor (also refer to Right-of-Way on page 3-19 of this document).

B Your comments are noted and will be considered in the BLM's decision process.

LETTER #A-10
COMMENTS

RESPONSES

Again, I apologize you to prevent this tragic
loss of a valuable public trust in your
hands.

Sincerely yours
Michelle Buckner

M. Hie Buckner
2818 Truman Ave
Oakland, Cal. 94605

LETTER #A-11
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

9/19/92

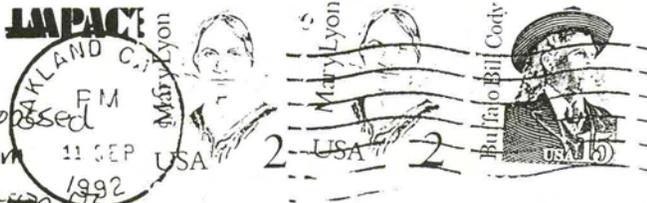
AWARD WINNING **IMPACT**

Dear Mr. Simanson,
I recently learned about the proposed
Southwest intertie project. I am
strongly against the construction of
such massive powerlines across the
Nevada desert; the impacts on
the wildlife, the historical &
archaeological sites & the visual
impacts far outweigh the
justification of regional power
transfers.

I support the "No Action"
alternative. - Roslyn Bullas

1865 Alcatraz Ave - Berkeley CA

94703
= 2064 ORGAN PIPE CACTUS—ORGAN PIPE NATIONAL MONUMENT WAS ESTABLISHED
IN 1937 ITS LARGE AREA IN SOUTHERN ARIZONA PROTECTS SOME OF
THE MOST SPECTACULAR SONORAN DESERT SCENERY IN NORTH AMERICA
PHOTOGRAPHER—DAVID MUENCH



Karl Simanson
BLM
Burley District Office
Route 3 Box 1
Burley, ID 83318

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LETTER A-11

LETTER #A-12
COMMENTS

RESPONSES

959-B Nol St.
San Francisco, CA.
94114

- A All of your concerns are addressed in the SWIP DEIS/DPA. Your comments are noted and will be considered in the BLM's decision process. One of the criteria used in the selection of the environmentally preferred route and the Agency Preferred Alternative was paralleling existing rights-of-way.

Karl Simonson
BLM Burley Dist. Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

I am writing to express my opposition to the proposed Southwest-Intertie powerline project. This project would create massive impacts on open valleys in eastern Nevada. The visual impact would be tremendous. There is also potential for significant impact on desert tortoise populations, especially in the Pahrangat Wash area, and on hawks, eagles and other raptors that would be killed by the power lines. Additional concerns are the proximity of the proposed route to the Great Basin National Park, as well as potential impacts on the many archeological and historic sites in the path of the powerlines.

LETTER #A-12
COMMENTS

RESPONSES

The No action alternative is the best. If the project must be built (I am not convinced that it is necessary), it would be better to follow existing right-of-way which have already been built upon, rather than to spoil pristine open valleys.

Thank you for your attention. I would appreciate a response.

Sincerely,

David Bunch

LETTER #A-13
COMMENTS

September 12, 1992

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson,

I am writing to support the "No Action" alternative to the proposed construction of a 500 Volt powerline from Idaho to Las Vegas. No powerline should be routed down our fast disappearing natural valleys, nor has any justification been presented in the EIS showing a compelling need for the line. In fact this is a redundant line competing with another Utah to Las Vegas powerline such that, with two, neither could run anywhere near capacity. When more capacity is really needed, it can readily be added to the existing routes in Utah, thus preserving our public open-valleys for our own and future generations' enjoyment. The impact on a new area is far greater than expanding an already built-upon right-of-way. The BLM should be defending open public lands rather than assisting in their destruction.

- A [The negative environmental, historical, and social consequences of this proposal are immense. To mention a few, the visual impact to now-open valleys would be disastrous. Ravens are attracted to perch on power lines and feed on young desert tortoise, thus adding to the precarious struggle of this already threatened species. The powerline runs the same north-south route taken by one of the largest hawk migrations in North America. Every year numbers of hawks and eagles are killed by high voltage power. The route runs over Sacramento Pass through Great Basin National Park, creating a huge visual disaster in this popular scenic area. Directly in the path of the powerlines are an estimated 200 to 400 archaeological and historical resource sites which will be destroyed.

RESPONSES

A Please refer to the expanded Purpose and Need on page 3-1 of this document.

B There would be impacts to desert tortoise, although mitigation measures applied during construction should be very effective in reducing or eliminating these adverse effects. The question of transmission line impacts on hatchling tortoises is a subject of ongoing study. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

Given the structural configuration of 500kV transmission lines, the BLM feels that the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission towers proposed for the SWIP will utilize V-guyed steel lattice towers, self-supporting steel lattice towers, and tubular steel H-frames. The spacing between conductors on these structures is sufficient to prevent phase-to-phase or phase-to-ground contact. Conductors are hung on the towers at approximately 23 to 32 feet apart. Further, conductors are hung on insulating systems that will be 14 to 20 feet in length depending on tower design (refer to pages 2-12 through 2-14 of the SWIP DEIS/DPA). Because of the distance between conductors and the towers, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the supporting tower.

The BLM acknowledges that numbers of raptors are killed each year in the United States as a result of electrocution. Most such incidents occur, however, on lower voltage distribution lines.

Refer to Avian Collision Hazards on page 3-89 in this document.

C The SWIP would not pass through Great Basin National Park. It would pass approximately two miles north of Great Basin National Park. To further minimize visual impacts to travel routes leading into the park, several minor

LETTER A-13

LETTER #A-13
COMMENTS

E [Clearly, there is no compelling need nor moral justification for the proposed powerline; and there are many very compelling reasons to take no action.

Sincerely,



Kate Caldwell
408 North Street
Oakland, CA 94609

RESPONSES

reroutes through Sacramento Pass have been evaluated (refer to Sacramento Pass Mitigation Reroute on page 3-39 of this document).

No significant visual impacts to viewpoints in the Great Basin National Park would occur because of the distance of the alternative routes from these viewpoints. Non-specular conductors and steel H-frame towers across the highway would minimize other adverse visual effects of the SWIP.

D The SWIP DEIS/DPA indicates on page 4-86 that 200 to 400 archaeological and historical sites may be present along the selected route; it does not mean they will be destroyed. There is substantial flexibility in the design of transmission lines and associated access roads. If the project is approved, detailed surveys will be conducted to locate sites and assist project engineers to avoid and preserve most cultural resources in place. Measures to mitigate impacts on other sites will be developed in consultation with appropriate regulatory agencies.

E Please refer to the expanded Purpose and Need on page 3-1 of this document.

LETTER #A-14
COMMENTS

Dear Karl Simonson,

This letter is regarding the powerlines that are to be put across untouched land in Nevada.

I don't think this has any purpose, since the only thing that can happen from it, is destruction. You can use the already built-upon right-of-ways rather than any designation of new right-of-ways. The impact on a new area is FAR greater than expanding an already built-upon right-of-way. When more capacity is really needed, let it be added to the existing routes in Utah.

A [The impact on wildlife would be outstanding. Powerlines are a favorite spot for ravens to perch while seeking out young desert tortoise as prey. They are an endangered species. Please don't make them become extinct. Also the impact on hawks and raptors. The powerline will run the same north-south route taken by one of the largest hawk migrations in North America. Every year numbers of hawks and eagles are killed by high voltage power.

RESPONSES

A There would be impacts to desert tortoise, although mitigation measures taken during construction should be very effective in reducing or eliminating these adverse effects. The question of transmission line impacts on hatchling tortoises is a subject of ongoing study. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations can not be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

Given the structural configuration of 500kV transmission lines, the BLM feels that the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission towers proposed for the SWIP will utilize V-guyed steel lattice, self-supporting steel lattice, and tubular steel H-frame towers. The spacing between conductors and towers is sufficient to prevent phase-to-phase or phase-to-ground contact. Conductors are hung on the towers at approximately 23 to 32 feet apart. Further, conductors are hung on insulating systems that would be 14 to 20 feet in length depending on tower design (refer to pages 2-12 through 2-14 of the SWIP DEIS/DPA). Because of the distance between conductors and towers, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the supporting tower.

The BLM acknowledges that numbers of raptors are killed each year in the United States as a result of electrocution. However, most of these incidents occur on lower voltage distribution lines.

Refer to Avian Collision Hazards on page 3-89 of this document.

LETTER #A-14
COMMENTS

RESPONSES

There is estimated 200 to 400 archaeological and historical resource sites in the direct path of the powerlines. An estimated 50 to 125 of these are expected to have "significant value". Please do not destroy our precious resources. Without them we cannot live. I think we need to preserve natural habitat, don't you?

B Please refer to the expanded Purpose and Need section on page 3-1 of this document.

I would love to go somewhere and not have to look at a huge, ugly metal thing, when I could be looking at beautiful mountains.

B I support the "NO ACTION" alternative. No powerlines should be routed down our fast disappearing natural valleys. No justification is presented in the report which shows a compelling need for the line. In fact it is a redundant line to compete with another Utah to Las Vegas powerline.

Please understand what is going to happen if this powerline does. I love this land, and I hate to see man being so selfish with it. After all, we couldn't survive without it.

Sincerely,

Michelle Cayagno

LETTER #A-15
COMMENTS

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

Brenda S. Constance
5817 Rae Dr.
Las Vegas, NV 89108

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

Re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Brenda S. Constance

LETTER A-15

LETTER #A-16
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

Joseph E. Constance, Jr.
5817 Rae Dr.
Las Vegas, NV 89108

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Joseph E. Constance, Jr.

LETTER A-16

LETTER #A-17
COMMENTS

Karl Simonson
Bureau of Land Management
Borley District Office

To Whom It May Concern:

A I am writing in regard to the Southwest Intertie Project. I urge you to support the "No Action" alternative to this project. No compelling economic justification was presented in the EIS to warrant such a huge powerline across such a vast expanse of wild lands. Nevada is one of the few states in the union that still has any wild, untouched valleys. It is crazy ~~to~~ to route big (probably unnecessary) powerlines across our few remaining pristine valleys rather than having them parallel existing roads and powerlines. "Visual impact" guidelines should be applied at least as strictly to unspoiled areas as they are to truck routes! And it is a visual insult to run a huge power corridor in the immediate viewshed of Great Basin National Park.

B

RESPONSES

A Refer to the expanded Purpose and Need on page 3-1 of this document.

B Routing alternatives favored designated utility corridors where there were already utilities rather than favoring pristine valleys. In fact the impact models favor areas that have been previously disturbed (e.g., existing roads, transmission facilities).

Travel routes with a large percentage of truck traffic and origin-destination travel were considered moderate sensitivity viewpoints, while viewpoints such as residences, trails, and scenic routes were considered high sensitivity. The Great Basin National Park is considered nationally and regionally significant. The potential impacts to viewpoints within the park and the highway approaches to the park have been considered in the impact assessment and comparison of alternative routes. Several mitigation reroute alternatives were analyzed in the Sacramento Pass area (refer to page 3-39 of this document).

LETTER #A-17
COMMENTS

RESPONSES

The adverse environmental effects of these proposed powerlines is undisputable, particularly on the desert tortoise habitat in ~~the~~ Pahranaqat Wash and on the major raptor migration corridor in the Goshutes.

Sincerely,
Ingrid Crickmore (friend and frequent
visitor of the Nevada
wilderness)
1290 Hopkins #37
Berkeley, CA 94702

P.S. I find the involvement of the LADWP in
this project highly suspicious!

LETTER #A-18
COMMENTS

RESPONSES

Kurt E. Criss
1722 Crestwood Dr. A
Elko, Nevada 89801

September 18, 1992

Bureau of Land Management
US Department of the Interior
Burley District Office
Route 3, Box 1
Burley, Idaho 83318

Re: Comments on Draft EIS of the Southwest Intertie Project

Dear Gentlemen and Ladies:

After review of the Draft EIS on the proposed Southwest Intertie Project, I offer a few comments regarding its accuracy. My particular concern is the crosstie project's routing and potential impact to the Great Basin National Park (GBNP) and surrounding area.

A [The agency and utility preferred crosstie routing, the 230kV Corridor Route, will undoubtedly visually impact sensitive existing and proposed viewpoints as it passes immediately north of the GBNP. Quantifying such an impact is difficult. In furnishing readers with information to make such a judgement, an EIS should provide accurate and thorough data for review. It does not appear that this draft EIS provides either.

B [Photo simulations providing a basis for quantifying the project's visual impact to the GBNP when viewed from Highway 50 are taken from a vantage point which conveniently hides a very significant visual resource, Wheeler Peak. Had this photo been taken from a slightly different perspective, Bald Mountain and Buck Mountain would not have obstructed Wheeler Peak. This particular camera angle does not give a reader the true picture by which to judge the visual sensitivity of this resource.

A The SWIP DEIS/DPA adequately addresses the visual impacts to Great Basin National Park. The visual studies showed that from the viewpoints identified by the NPS (located outside the study corridors), impacts would be low and at extended viewing distances from the park viewpoints. The SWIP DEIS/DPA needs only to summarize the significant issues and impacts. A complete description of the visual analysis can be found in Volume III - Human Environment Technical Report (refer Appendix H of the SWIP DEIS/DPA for locations where this technical report can be reviewed).

B The photo simulations provided in the SWIP DEIS/DPA depict the alternative SWIP routes quite accurately. Simulation viewpoints were selected to show typical views. The Highway 6/50 simulation you refer to was selected because it is the approximate location for a proposed interpretive facility in Great Basin National Park's Draft General Management Plan. Additional simulations were prepared to analyze the Sacramento Pass Mitigation Reroute (refer to Figures 3-13 to 3-19 in Chapter 3 of this document).

LETTER #A-18
COMMENTS

C Further, no photos are included to simulate visual impacts to viewers within the GBNP looking north and northeast to gain an understanding of the basin and range terrain. It is my understanding that officials of the GBNP plan to develop northerly viewpoints and a new tourist center to educate visitors about this distinctive geology. Certainly a simulation or assessment should be included which depicts the impact of a power line that would span a viewers entire peripheral vision.

I must close by pointing out that I am not opposed to projects of this type which benefit both the public and industry; however, I believe routing of the transmission line should not unduly impact a resource as significant as the Great Basin National Park. Selection of the proposed Cutoff Route would mitigate these visual impacts - it is the environmentally preferred routing.

Sincerely,



Kurt E. Criss

RESPONSES

C A simulation looking north or northeast from Great Basin National Park viewpoints was not completed because the towers generated by computer-generated perspectives were too small to be accurately painted into a simulation. Based on the modeling done for the simulation, the 230kV Corridor Route would have been barely perceptible, if seen at all. Concern for visual impacts to views from the park were primarily under specific lighting conditions where towers or conductors may cause sunlight to reflect. This could create visibility conditions greatly exaggerated over that of normal lighting conditions. To mitigate these special lighting effects the use of non-specular conductors has been specified.

LETTER #A-19
COMMENTS

SEP. 5, 1992

Dear Mr. Simonson,
I'm writing with great concern regarding the Southwest Intertie Project. I want you to know that I support "NO ACTION" Alternative to the power line. Already existing right-of-ways are sufficient, I believe, to make unnecessary the designation of new right-of-ways. Considering the large visual impact of (right-of-way) power lines through the valleys indicates the great loss to the beauty of the proposed "Non Built up ~~area~~ valley right-of-ways. Wildlife ~~experts~~ have also suggested the detrimental impact of these lines upon young tortoises (see Pahrumpat wash area, for an example). Further the lines are suspected of having a deleterious effect upon raptor migrations. As a camper/hiker, I shudder at the thought of encroachments upon the natural well-being of Great Basin Nat'l. park.
Df As an archaeologist, I KNOW that

RESPONSES

A The SWIP would require a new right-of-way specific for a 500kV transmission line. It is not possible to utilize existing rights-of-way that were granted for other uses. These existing or designated corridors have other utilities in them and may be considered "already built upon rights-of way". The SWIP routing alternatives utilized designated or planning corridors whenever feasible in meeting the project needs (refer to Chapter 1 of this document).

There would be visual impacts to the open valleys that the SWIP may cross. These impacts are disclosed and documented in the SWIP DEIS/DPA on pages 4-35 through 4-45.

B The question of transmission line impacts on hatchling tortoises is evolving. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure, and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers or raven predation. We believe it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

C The potential deleterious effect of electrical transmission lines on raptor migration, suspected or otherwise, has never been documented in the scientific literature to the BLM's knowledge. There is no question that raptors occasionally collide with transmission lines. The reasoned opinions, however, suggest that raptors, as a group, are possessed of such keen eyesight and finely-tuned flying skills, that such collisions usually occur during the pursuit of aerial prey or in defense of territory. Collisions with man-made structures are a very minor aspect of raptor population mortality. Refer to Avian Collision Hazards on page 3-89 of this document.

Raptors do not migrate at night (as do most songbirds), nor do they migrate in flocks (as do most shorebirds and waterfowl). Consequently, the BLM has difficulty envisioning a situation in which a large, highly visible electrical transmission system, occupying a very, very, small percentage of the total landscape could interfere with migration patterns of raptors.

LETTER A-19

LETTER #A-19
COMMENTS

RESPONSES

D The SWIP DEIS/DPA acknowledges that a number of cultural resources are likely to be adversely affected by construction of the SWIP, but also documents that planning studies have considered and avoided the most significant known cultural resources in the region. A programmatic agreement (refer to Appendix CR-12 in the Volume IV - Cultural Environment Technical Report) has been executed to ensure that continued data collection and regulatory review result in appropriate avoidance and mitigation measures if the project is approved and detailed design work is undertaken. For example, after the centerline is surveyed, a cultural resource inventory along the right-of-way would be made and appropriate mitigation made prior to any ground disturbing activities. These procedures will minimize impacts and ensure that important archaeological data are retrieved prior to construction.

D Construction of the lines could permanently destroy a significant number of archaeological sites. These are losses which could never be reversed!

It is my belief that the role of the BLM should be that of conservator of our nation's natural heritage. As such, I

urge you to do all that is in your power to halt (support "no action") on the proposed line. I would appreciate

receiving information as to the position which your office is advocating on this matter.

Thank you. Sincerely,

Brandon Fine

Brandon Fine
1050 2800 Carolina Street
San Francisco, CA 94107

LETTER #A-20
COMMENTS

P.O. Bx 140
Baker, NV 89311
September 17, 1992

Karl Simonson, District Mgr.
Burley District Office, BLM
Route 3, Box 1
Burley, ID 83318

Re: Crosstie Route, SW Intertie Project

Dear Mr. Simonson,

I'm from Baker, Nevada. You don't have to be a prophet to know I'm going to object to your choice of the 230kV Corridor Route.

But I won't waste your time recapping the arguments against your route choice. You've probably heard them all. I'd just like to ask you a couple of questions.

Have you ever had to make decisions regarding the welfare of your kids or grandkids? Did you make a different decision than you might for yourself or another adult?

I suggest that's what we have here, and it's the only important reason for the Cutoff Route being a better choice than the Corridor Route. Expedient decisions work fine when you're thinking a year or two, not so fine when you're thinking a generation or two.

Hundreds of thousands of visitors over the next half dozen decades will see our Great Basin valley dissected by something that from the Snake Range will look like surgery staples, marching across the belly of the valley. Unlike surgery staples, these staples won't be coming out.

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

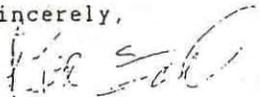
LETTER #A-20
COMMENTS

RESPONSES

Then there will be the kids that will live under this 500 kV line. There will be several hundred of them over the life of this line. Will these kids suffer biological ramifications? The jury's out, I know. I also know there would be no "jury" unless some fine professional scientists believed that the initial evidence indicates cause for alarm. Yet you are apparently willing to mortgage these kids future to save yourself some hassle.

My point is made, Mr. Simonson: you're choosing today at the expense of tomorrow. Detroit did that, as did the S & L's. Maybe you'll be luckier.

Sincerely,



Peter Ford

LETTER #A-21
COMMENTS

Ruth M. Fricker
905 West Middlefield #944
Mountain View, CA 94043

September 7, 1992

Mr. Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson,

As a member of Desert Survivors I have been informed of the proposed construction of a 500 Volt powerline from Idaho to Las Vegas. Our group has reviewed the Environmental Impact Statement and was astounded at the HUGE impact. It appears to be unclear whether there is any real economic justification for this powerline. Issues that concern me are listed below:

- A [-Please support the NO ACTION Alternative. I understand there is already a Utah to Las Vegas powerline that would be redundant to this proposed line.
- B [-Support the use of existing already built-upon right-of-ways rather than any new right-of-ways. The impact is upon a new area is far greater than the impact created by expanding upon an already existing right-of-way.
- B [-There would be an incredible visual impact to now open valleys. The BLM should be defending the open public lands against new encroachments, not assisting their destruction.
- C [-There would be a significant desert tortoise impact where power lines and highways compete for space with wildlife. Powerlines allow predators to perch and find young tortoises as prey.
- D [-There would be a significant hawk and raptor impact where power lines run along the migration route. Every year many raptors are killed by high voltage power.

RESPONSES

A Page 2-31 of the SWIP DEIS/DPA discusses the reason that the SWIP was expanded south of the Ely area to the Las Vegas area. It states that in early 1990, it was determined that the UNTP was fully subscribed and would not have the capacity to allow access to marketplace (the Las Vegas area) for the SWIP. In June 1990 the SWIP was expanded from the Ely area to Dry Lake.

The SWIP is not redundant to any other project. The existing line between Utah and Las Vegas, Sigurd to Harry Allen 345kV line, is limited to a maximum of 300 MW, significantly below the 1200 MW capability of SWIP.

B The SWIP will require a new right-of-way specific for a 500kV transmission line. It is not possible to utilize existing rights-of-way that were granted for other uses. These existing or designated corridors have other utilities in them and may be considered "already built upon rights-of way". The SWIP routing alternatives used designated or planning corridors whenever feasible in meeting the project needs.

The BLM agrees there would be significant visual impacts to some of the scenic areas of public lands.

C The BLM agrees that there would be impacts to desert tortoise, although mitigation measures taken during construction should be very effective in reducing or eliminating these adverse effects. The question of transmission line impacts on hatchling tortoises is a subject of ongoing study. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure, and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

D Given the structural configuration of 500kV electrical transmission lines, the BLM feels that the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission systems proposed for the SWIP will utilize tubular steel H-frame and/or steel lattice towers. Spacing of conductors on such structures is sufficient to prevent phase-to-phase or phase-to-ground

LETTER A-21

LETTER #A-21
COMMENTS

- EC -There would be an impact on the Great Basin National Park.
F -There are an estimated 200 to 400 archaeological and historical resource sites in the direct route of the powerlines.

As we humans over-populate the earth, let's try to leave some room for the other creatures.

Sincerely,



RESPONSES

contact. In order to achieve this safety measure, conductors are hung on the supporting structure in such a manner that they are 23 to 32 feet apart. Moreover, conductors are hung on insulating systems that will be 14 to 20 feet in length depending on tower design (See SWIP DEIS/DPA pp. 2-12 through 2-14). Because of the distance of conductors from the support structure, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the supporting tower.

The BLM acknowledges that numbers of raptors are killed each year in the United States as a result of electrocution. Most of these incidents occur, however, on lower voltage distribution lines.

Refer to Avian Collision Hazard in the Biological Resources section of Chapter 3 of this document.

- E The BLM agrees that there would be visual impacts to the routes leading to Great Basin National Park and to a lesser degree from some of the park's viewpoints. However, because of the distance of all of the alternative routes from the park and the commitment to utilize non-specular materials in the construction, visual impacts would not be significant.
- F If one of the routes is approved by the BLM, there will be a cultural survey completed for any potentially disturbed areas (e.g., rights-of-way, access routes, assembly yards). Cultural resource impacts will be mitigated.

LETTER #A-22
COMMENTS

Karl Simonson
BLM, Burley District Office
Route 3 Box 1
Burley, ID 83318

September 3, 1992

Re: Comments on DEIS for SWIP

Dear Mr. Simonson:

Congratulations on a well-designed, readable and thorough Draft EIS on the Southwest Intertie Project.

In the matter of the Crosstie route, unfortunately, the document is seriously flawed. The choice by your agency and by LADWP of the 230kV Corridor Route, rather than the environmentally preferred Cutoff Route, is hard to understand and certainly unconscionable.

The overriding rationale cited for this choice is the FLPMA policy of consolidating corridors where possible. That is of course a correct policy, but the "where possible" provision surely is included for precisely the situation at hand. Surely any general policy must be applied only when it makes sense.

In this case consolidation of corridors does not compute. The environmental havoc created by a 500kV line is of an entirely different order of magnitude than the damage associated with the present 230kV installation.

The 230kV lines were subject to a far less careful environmental scrutiny, and were built before the establishment of Great Basin National Park. The wooden poles are relatively inconspicuous, and from a great distance blend with the terrain in a way that would be totally impossible for the proposed steel towers.

In 1986, largely because of the relatively pristine nature of the Snake Range and its adjacent valleys, the decades-long effort to establish a national park in the Great Basin culminated in the choice of this site. The federal legislation establishing the Park specifies that both basin and range be embraced by the Park's interpretive and educational efforts.

The viewshed from the Park is oriented to Snake Valley, and an integral part of the unique beauty of this place is just that prospect: a fifty-mile view to the east across the unspoiled basin to the mountain ranges beyond, and to the north from the valley depths to the 12,000' heights of Mt. Moriah.

RESPONSES

A The BLM believes that it does make sense to construct the SWIP within the existing corridor. The surface disturbance and potential environmental impacts of constructing and operating a 500kV transmission line are not significantly different from a 230kV system, with the exception of greater visual impacts.

The 230kV lines likely did undergo less public and agency scrutiny when they were permitted and constructed than they would if they were proposed today. However, given the connection points and purpose and need for the 230kV lines, their siting was proper. The 230kV system would likely have been permitted where it is even if the Great Basin National Park had existed at that time because the visual impacts to viewpoints within Great Basin National Park from these lines are almost imperceptible.

Generally, wood-pole structures tend to be more acceptable visually in the landscape, especially in near (foreground) views. However, steel lattice towers tend to blend in better at a distance, whereas, wood towers tend to be more visible from a greater distance.

B Because of the distance of the proposed transmission lines from the viewpoints in Great Basin National Park, the Ely to Delta segment built on the 230kV Corridor Route would not have significant visual impacts on views. There would, however, be visual impacts to traveler's views from the U.S. Highway 6/50 approaching the park. Several alternative crossings of U.S. Highway 6/50 have been evaluated to minimize visual impacts to highway travelers and to avoid private lands (refer to Sacramento Pass Mitigation Reroute on page 3-39 of this document).

There would also be visual impacts to views from dispersed areas within the Marble Canyon WSA and Mt. Moriah Wilderness area if the Cutoff Route is selected.

LETTER A-22

LETTER #A-22
COMMENTS

B The steel towers of the proposed 500kV line would be clearly visible to every one of the 70,000 annual visitors, both from the Park and from their approach on highway 50 through the exquisite Sacramento Pass. The quality of the present experience would be fundamentally changed.

This concern would seem to be legitimated by the agency's own admission on page 2-48 relating to Marble Canyon and Mt. Moriah Wilderness areas: "BLM is concerned about the visual effects (of the Cutoff Route) from dispersed areas within both of these areas."

C Furthermore, in Snake Valley the 230kV lines cross very near to several ranch homes where small children live, and each of these families wishes daily that the power lines were not so close. This is because of the physical discomfort experienced at close range, together with the unsettling scientific reports of biological damage possibly caused by high voltage installations (as well as the considerable inconvenience of farming around the poles).

As you undoubtedly know, people in Nevada and Utah are not readily mollified by government and industry assurances that possible health risks from technology are "unproven". As your Draft EIS itself suggests, the jury is still out on this one.

Needless to say, the families already severely impacted by the present 230kV installation are unalterably opposed to the imposition of the proposed 500kV project. They take no comfort in an unintelligent adherence to FLPMA policy, which would disregard their rights on the basis that their homes are already somewhat spoiled.

Fortunately, in response to some of these considerations which were voiced during the scoping process, an alternative route for the Crosstie was worked out, and designated as the environmentally preferred Crosstie route. Not only does the Cutoff Route avoid major visual damage to the National Park; it is preferable for most other human and environmental reasons, too.

RESPONSES

C EMF is an especially difficult issue for which there may be no conclusive results for many years. Please refer to the EMF discussions in Chapters 3 and 4 of the SWIP DEIS/DPA and to Recent EMF Research in Chapter 3 of this document for more information.

It is true that the Ely to Delta segment would cause visual and land use impacts from its construction and operation. However, impacts to the agricultural lands along the existing 230kV lines in this area would be avoided by the 230kV Corridor Route (refer to Sacramento Pass Mitigation Reroute in Chapter 3 of this document).

LETTER #A-22
COMMENTS

In this regard specifically, the Draft EIS is self-contradictory:

- D [1) The statement on page 2-56 that the LADWP preference for the 230kV Corridor Route "reflects LADWP's commitment to minimize environmental impacts whenever possible even at reasonable increased project costs" is pure doublespeak.
- E [2) So also is the agency assertion on page 2-58 that the "230kV Corridor Route and the Cutoff Route have similar environmental impacts." The latter route affects neither the private landholders referred to above, nor the 70,000 National Park visitors.

Thanks again for a mostly admirable Draft EIS. I trust that the Final EIS will be amended to favor either the Cutoff Route or better yet, since no need for the Crosstie is demonstrated, no action at all. Obviously, any environmental degradation around Great Basin National Park can have real economic consequences for this whole geographic area.

Yours truly,

Jo Anne Garrett
Jo Anne Garrett

Post Office Box 130
Baker, Nevada 89311

RESPONSES

- D The LADWP's preference for the 230kV Corridor Route is largely because of their preference to interconnect at the Robinson Summit substation site and in response to FLPMA's mandate to consolidate utilities "In order to minimize adverse environmental impacts and the proliferation of separate rights-of-way..." Although, other routes (e.g., the Direct Route) are shorter and would be less costly, the LADWP would use the longer 230kV Corridor Route to avoid public environmental concerns (e.g., not impacting undisturbed valleys). Further, the 230kV Corridor Route would result in the least cumulative effects for connecting to the Robinson Summit substation site (refer to Scenario 3 on page 3-13 of Chapter 3 of this document).
- E Although the specific impacts between the Cutoff Route and the 230kV Corridor Route are different, the impact comparisons and tradeoffs make these two alternative routes difficult to distinguish. In any environmental comparison it is necessary to compare impacts that are dissimilar. The BLM has provided an additional discussion of environmental preference under Cumulative Effects in Chapter 3 of this document. The future foreseeable utility "buildout" (i.e., cumulative effects) in the Ely area has helped distinguish an environmental preference between these two alternative routes.

LETTER #A-23
COMMENTS

RESPONSES

Damun Gracenin, Ph.D.

508 Clayton Street
San Francisco, CA 94117

A Your comments are noted and will be considered in the BLM's decision process. Refer to the expanded Purpose and Need section in Chapter 3 of this document.

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, ID 83318

September 14, 1992

re: Southwest Intertie Project EIS

Dear Sir:

Just say no to the powerline they want to route across some of my favorite parts of this earth. Please expand existing right-of-ways to carry power from Idaho to Las Vegas.

The new proposed corridor would uglify some very pretty country. You folks should be defending unspoiled land rather than assisting in its destruction.

Maybe you don't care about setting the young Desert Tortoise up for Ravens who like to perch on power lines, or about impeding the migration of large birds of prey. Perhaps it means little to you that the proposed power-line corridor will have a bad impact on 200 to 400 archeological and historical resource sites, or that it will disfigure Great Basin National Park. Maybe all you care about is money. There is no

LETTER A-23

LETTER #A-23
COMMENTS

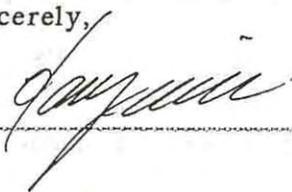
RESPONSES

economic justification for the powerline. Las Vegas does not, and will not, need that kind of extra power capacity in spite of rapid growth out towards its radio-active boundaries to the north and into the urban decay at its center.

I support the "No Action" alternative.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. J. ...", is written over a horizontal dashed line.

Educational Consultant
415-431-2109

LETTER #A-24
COMMENTS

RESPONSES

253 Manzanita Dr. A
Orinda Ca. 94563

Sept 8, 1992

B.L.M.

Burley District Office

Burley Idaho 83318.

The primary need for the SWIP is to postpone construction of additional generation facilities within the WSCC region by providing the capability to take advantage of seasonal diversity between regions and regional economy power sales. Please refer to the Purpose and Need for the SWIP in Chapter 1 of the SWIP DEIS/DPA and an expanded Purpose and Need section in Chapter 3 of this document.

Dear Mr. Simonson;

I am writing to comment on the proposed powerline across eastern Nevada. I realize I am considered an interfering Californian, but open BLM lands belong to us all, and this area across the mountain ranges and open valleys of Nevada that I love and consider as a precious last open unspoiled area of this vast country belongs to me as well as Nevada.

I have not heard any reasoned arguments why this powerline is justified. Why is it needed? Are we really running out of power, or or we

LETTER A-24

LETTER #A-24
COMMENTS

A | planning for some future population
| explosions in these areas (Las Vegas?)?

| If there is a need, then I strongly
| support the routing of the lines over
| existing right of ways or built-already
| areas. Let it be added to existing routes. Do
| not damage a pristine valley. These
| areas are homes and migration routes
| for many birds and tortoises and
| any disturbance to these fragile habitats
| can endanger their survival, as we
| are recently learning throughout the
| world.

B | No lines should purposely be
| placed within the scenic outer regions
| of Great Basin National Park. Just
| because it's outside the Park boundary
| doesn't make it okay. Visually, it
| is an "eyesore" inside the park as
| well.

RESPONSES

B The visual impacts to Great Basin National Park viewpoints, to the highway approaches to the park, and to proposed interpretive facilities outside the park boundaries are documented on page 4-45 of the SWIP DEIS/DPA and in the Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where these technical reports can be reviewed).

LETTER #A-24
COMMENTS

RESPONSES

Please justify the need, firstly, especially
by such a suspicious and notorious
agency as the Los Angeles Dept. of Water
and Power, for this huge and damaging
project.

Sincerely,

Susan F. Graf

LETTER #A-25
COMMENTS

Jeanette Guerin
953 Celebration Dr.
Las Vegas, NV 89123

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 5, 1992

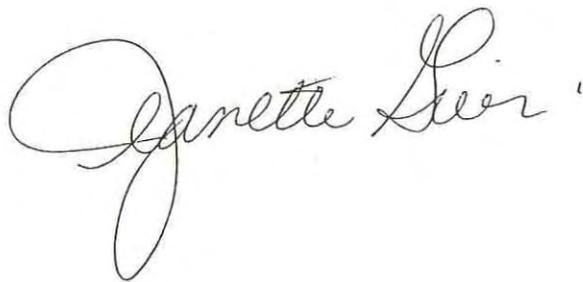
Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

Re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,



LETTER A-25

LETTER #A-26
COMMENTS

2043 Berryman Street
Berkeley, CA 94709
September 12, 1992

RESPONSES

Mr. Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

I have reviewed the draft EIS for the proposed Southwest Intertie Project, and while I generally support the project, I am strongly opposed to the proposed route..

No powerlines should be routed down our fast-disappearing natural valleys. Instead, existing built-upon power and road right-of-ways should be used. The visual and environmental impact on a new area is FAR greater in a new area than in an area that is

LETTER A-26

LETTER #A-26
COMMENTS

A [already built-upon. The existing criteria for judging visual impact is skewed against preserving non-built upon areas. It is my opinion that the BLM should be defending public land against new encroachments, not assisting in their visual and environmental degradation.

Thank you for considering my views —

Sincerely,
David W. Halligan

RESPONSES

A Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although undisturbed natural landscapes of open desert valleys in Nevada and Utah possess inherent scenic value, the scenic quality of these areas is considered "minimal" to "common" based on the definitions of scenic quality used in the VRM System. Scenic quality classes are determined in context with the regional landscape character. Open desert valley landscapes are characteristic and common to much of the project study area.

The BLM will consider public concerns for scenic quality in its decision process. The BLM uses the VRM System to manage the visual resources of public lands. For a detailed explanation of the VRM System and the visual impact assessment model, refer to the Methods section under Visual Resources in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where these technical reports can be reviewed).

LETTER #A-27
COMMENTS

Karl Simonson
B&E, Burley District Office
P.O. Box 3
Burley, Idaho 83318

Ely Sept 15 1992

RESPONSES

- A In response to your and other comments about impacts to private lands in the area, several minor reroute alternatives were evaluated (refer to Sacramento Pass Mitigation Reroute in Chapter 3 of this document).

"Comments on DEIS for SWIP"

Dear Mr. Simonson:

*After reading the draft EIS on the Southwest
Interctic Project, I would like to make a few comments.
First, the choice by your agency and by LADWP of
the 230KV Corridor Route rather than the environ-
mentally preferred Cutoff Route is hard to understand
and certainly without much concern for the people
living near this line.*

*I have stated to you before, that if you would bring
this line across my property it would be total ruin
for something that we have tried to build up for the past*

LETTER #A-27
COMMENTS

RESPONSES

20 years. There are now 2 major 230KV lines already on this 160 acre property and certainly a 500KV with Steel Towers is unthinkable going through also. Since my son is raising his children on this farm and already has to work directly under the powerlines a another line crossing over the field, will make it that much more hazardous and undesirable.

Do you love your Children and Grandchildren?
We had hoped to put a "Point" Irrigation system in to be more efficient and save man power, but the already in Place 230 lines are making that task almost impossible, and a 500 KV line with Steel towers would make it totally impossible.

Also the cutoff Point would have much less effect on private landowners and would minimize possible environmental impacts.

LETTER #A-27
COMMENTS

RESPONSES

In case it is not clear where this property is located it is on the Nevada, Utah Border located in Millard County. Thank you for letting me make these comments and I trust you'll make the right choice.

Sincerely

Mrs. Gene D. Harkithorn

Herkethorn
HC 33 Box 33 405
Ely NV 89301

LETTER #A-28
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Don Hendricks
609 N. Crestline Dr
Las Vegas, NV 89107

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Donald W Hendricks

LETTER #A-29
COMMENTS

1730 So Labrador
Las Vegas
Nevada
702-431-0052

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Alex Hewitt
Alex Hewitt

LETTER A-29

LETTER #A-30
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

Diana Hewitt
530 Delfern Lane
Las Vegas
Nevada 89109
702-731-4191

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,



LETTER A-30

LETTER #A-31
COMMENTS

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

*1730 LABRADOR
LAS VEGAS, NEVADA
89122*

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,



JOSEPH B HEWITT IV

LETTER A-31

LETTER #A-32
COMMENTS

MARK HUG
2120 GREENHOUSE CT
LV NEV 89134
ph 256-3151

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,



LETTER A-32

LETTER #A-33
COMMENTS

September 7, 1992

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson,

A [I am writing to express my concern regarding the proposed Southwest Intertie Project. This project appears to be only marginally (if at all) necessary and would greatly disrupt the character of the landscape in its path and surrounding areas. In fact, there is already a powerline running from Utah to Las Vegas making the proposed project at least somewhat redundant. B

B [Of primary concern is the disruption and negative visual impact to now remote and natural valleys which are PUBLIC LAND. These areas can be seen and experienced by individuals as they were a century ago but if disrupted can never be replaced. There are numerous archaeological and historical sites in the path of this powerline C [which would be greatly and permanently impacted. Further, bird migration and tortoise habitats would be disrupted by the construction of this proposed powerline.

D [I am opposed to the construction of this powerline particularly over new right-of-ways. Even over existing right-of-ways, the economic justification for this project seems marginal at best given the lack of real need for the transfer of power and the significant cost associated with the construction.

Sincerely,


George Huxtable
158 Kellogg Way
Santa Clara, Ca. 95051

LETTER A-33

RESPONSES

A Please refer to the Purpose and Need section in Chapter 1 of the SWIP DEIS/DPA and in the expanded section in Chapter 3 of this document. Also refer to page 2-31 of the SWIP DEIS/DPA for a discussion of how in early 1990 the IPCo discovered that the UNTP would be fully subscribed and would not have the capacity to fulfill the purpose and need for the SWIP. It was in July 1990 that the IPCo decided to expand the project south from the Ely area to Dry Lake. The two major existing transmission lines between Utah and the Las Vegas area are the Sigurd-Allen 345kV and the IPP-McCulloch 500kV DC transmission lines. There is no available capacity on either of these lines.

B It is true that there could be visual impacts to valleys that are remote and largely undisturbed. Impacts in undisturbed landscapes that are not seen from sensitive viewpoints are documented as impacts to scenic quality in the SWIP DEIS/DPA and in Volume III - Human Environment Technical Report.

Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although the undisturbed natural landscapes of open desert valleys possess inherent scenic value, the scenic quality of these areas is considered "minimal" to "common" based on the definitions of scenic quality used in the VRM System. Scenic quality classes are determined in context with the regional landscape character. Open desert valley landscapes are characteristic and common to the project study area. The BLM will consider public concerns for scenic quality in its decision process. The BLM uses the VRM System to manage the visual resources of public lands. For a detailed explanation of the VRM System and the visual impact assessment model refer to the methods section under Visual Resources in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where these technical reports can be reviewed).

C For most species of birds, migration occurs at night at altitudes well above the maximum height of the SWIP transmission line. For species that migrate during the daylight hours, most are characterized by keen eyesight, (e.g., swallows, swifts, and raptors) and are very unlikely to be deterred by the presence of an electrical transmission line. It is unlikely that the SWIP would have any effect on local or regional bird migration patterns.

LETTER #A-33
COMMENTS

RESPONSES

Construction of the SWIP north of Las Vegas, Nevada will have some impact on desert tortoise habitat. However, judicious planning and careful monitoring during the pre-construction and construction phases of this project are expected to reduce potential impacts to desert tortoise to indiscernible levels. Soil disturbances resulting from activities at tower sites and other construction areas may enhance growth of spring annuals and actually increase the forage base for desert tortoise in the area of construction.

D The SWIP will require a new right-of-way specific for a 500kV transmission line. It is not possible to utilize existing rights-of-way that were granted for other uses. These existing or designated corridors have other utilities in them and may be considered "already built upon rights-of way". The SWIP routing alternatives utilized designated or planning corridors whenever feasible in meeting the project needs (also refer to Chapter 1 of this document).

LETTER #A-34
COMMENTS

KARL SIMMONSON
Bureau of Land Management
Burling District Office
Route 3 Box 1
Burling, Idaho 83318

RESPONSES

Jeremy Kamal
2810 Furthest Dr
LA, CA 90064

Memo. No
S.W. Interthe
Please,
- Ugly, Unnecessary
Intrusive & ecologically
Theatering

Dear Mr. Simonson,
I know that it is your job at
the Bureau to oversee the use of
public lands & make sure that
they are being used wisely. The Southwest
Interthe Project should look as bad to
you as it does to me & many of my
close friends & colleagues. It is shameful
me to know that the Bureau is even
considering such a project that would
squander the beauty of untouched mountain
ranges in ~~the~~ eastern Nevada ~~between~~
200-400 archaeological sites ~~with~~ the
integrity of the Great Basin National Park
the lives of poor hawks & eagles
that land innocently on the powerlines
Only to have their lives extinguished by

LETTER #A-34
COMMENTS

RESPONSES

A 500 volts of unnecessary power, & this project doesn't need to be there. This is a redundant line, there is already one from Utah to Las Vegas & it is nowhere near capacity. When more capacity is needed let it run upon right of ways where such ecological threats aren't present by its construction. The Utah alternative would work since the Thousand Springs was discontinued. This would look ugly in the open valley. new Please use the land wisely, don't let power lines come in here just

A Please refer to the Purpose and Need section in Chapter 1 of the SWIP DEIS/DPA and in the expanded section in Chapter 3 of this document. Also refer to page 2-31 of the SWIP DEIS/DPA for a discussion of how in early 1990 the IPCo discovered that the UNTP would be fully subscribed and would not have the capacity to fulfill the purpose and need for the SWIP. It was in July 1990 that the IPCo decided to expand the project south from the Ely area to Dry Lake. The two major existing transmission lines between Utah and the Las Vegas area are the Sigurd-Allen 345kV and the IPP-McCulloch 500kV DC transmission lines. There is no available capacity on either of these lines.

LETTER #A-35
COMMENTS

RESPONSES

— Accuracy
Agency
Endangered Species.
Resources at Risk

Alfred King

Oasis is the only commercial development along I-80 between Wells and Wendover. It is also the only residential development in this area directly adjacent to the interstate. The proposed power line route is within one half mile of the Oasis commercial area and residence at Oasis. It is within a mile of the residences at the Oasis Mobile Home Park.

Oasis is a natural place for further development. It is at an intersection of a state highway (233) with Interstate 80. A commercial development already exists with services for the highway travelers: fuel, mechanical services, motel, convenience store, and cafe. There is a 48 unit mobile home park that serves as a residential area for the Oasis employees and people who work in Wendover. An electrical substation is located at Oasis and a substantial water system with fire fighting capabilities is in place.

Northern Holdings Incorporated acquired the two sections of property at Oasis in 1988 with the intention of pursuing both commercial and residential development there. The previous owner, Flying 'S' Land & Cattle Company, had demonstrated an intention of development by its activities from 1983 to 1988. These activities included a number of meetings with the Elko County Planning Commission, the Elko County Commissioners, and the BLM.

Northern Holding's plan of development for sections 2 & 3 includes both residential and commercial use under and near the proposed location of the power lines. The power line path runs directly through the middle of section 3, virtually destroying the possibility of development.

Section 3 is the most visually appealing part of the Oasis property. The property lies at the base of the Pequop Mountains, across the mouth of Payne Basis, a beautiful area with many recreational possibilities. Much of this visual beauty will be spoiled by the proposed 150 foot towers and power lines.

LETTER #A-35
COMMENTS

A [There are several ways that the power line will adversely affect
the ability of Northern Holdings to develop its property. The first
is the direct loss of property. If the easement is 1,000 wide for a
mile that amounts to a direct loss of 121 acres. Since the line goes
down the center of the section it severely restricts the ability to
utilize the remaining portions of the section. The visual impact
B [would further reduce the ability to utilize section 3 and would also
make section 2 less desirable residentially. The concern about
Electromagnetic Fields, real or imagined, would certainly reduce the
number of potential residents of the Oasis area. Even if it turns
C [out that there are no long term detrimental effects of living or
working near powerful Electromagnetic Fields, many, if not most,
people are not convinced of that today, and would not knowingly
purchase or rent land near a large power line.

The visual impact and concern over EMF's would adversely affect
the desirability of Oasis as a stop for the traveling public as well
as the potential property owner or tenant.

Interest in Oasis as a residential community is increasing. The
population at Oasis rose 24% in the past year: primarily from people
who work in Wendover, but would rather live in a more rural setting.
The growth has been in tenants at the mobile home park, but there
have been inquiries about property in the area available for
purchase. Currently, of course, there is none.

Pressure on Wendover housing is high, and with all the possible
developments in the gaming and recreation industries, this pressure
will likely increase, creating more interest in Oasis as a bedroom
community. It is our clear intent to pursue development to satisfy
the demand.

Northern Holdings would encourage the BLM to reconsider the
placement of the SWIP power lines to a location east of Oasis, at
least to the Nevada Northern railroad. Further east would be
preferable.

RESPONSES

- A The right-of-way requested for the SWIP is 200 feet wide or about 24.5 acres per mile.
- B The BLM is unable to assess the specific visual impacts to future residential areas of Section 3 because there are no specific development plans for this land. Potential visual impacts to future land uses of mixed residential and commercial within Section 3 are addressed under "Impacts to the Oasis Area" in Chapter 3 of this document.
- C The numerous studies that have been conducted on EMF demonstrate that we are all affected in everyday life. EMFs are generated by microwaves, fluorescent lights, waterbed heaters, hair dryers, and any other device powered by electricity. The right-of-way width of 200 feet is intended to minimize these effects. Outside of the right-of-way, EMFs are expected to be no higher than those that normally occur in household appliances. Please refer to pages 3-72 through 3-82 of the SWIP DEIS/DPA and the Recent EMF Research section on page 3-19 of this document for additional information on EMFs.

While various studies of property value impacts have been conducted in the U.S., there is no conclusive evidence to suggest that transmission lines reduce the value or interest of adjacent properties. Some studies have shown no substantial decrease in value, while others have indicated property values and interest to be depressed.

LETTER #A-36
COMMENTS



September 16, 1992

Mr. Karl Simonson
BLM Project Manager
Burley District Office
Route 3, Box 1
Burley, ID 83318

Regarding: Comments on the EIS for the SWIP in Elko County, Nevada.

Dear Mr. Simonson:

This letter is a follow up to the presentation made by Northern Holdings, Inc. (NHI) at the August public hearing on the Southwest Intertie Project in Wells, Nevada. At that time we were asked to comment on the adequacy of the EIS. We have also been requested to add any specific suggestions as to route alternatives.

A [It is the contention of Northern Holdings that the EIS did not adequately address the adverse impact of the power line route on the private land owners whose properties are to be affected by the construction and continual presence of the power lines. In looking through the EIS it was difficult to find reference to Oasis and even more difficult to see that it had been considered any more than a reference point.

B [Northern Holdings received a copy of the SWIP EIS in June 1992. We were surprised to see the projected path of the power lines running through the middle of NHI property at the Oasis interchange on I-80. This was quite a change from the utility corridor published in the 1985 Wells Record of Decision by the BLM.

C [Northern Holdings acquired two sections of property at Oasis in October 1988 with the intention of pursuing both commercial and residential development on the property. The previous owner, Flying 'S' Land and Cattle company, had demonstrated an intention of development as documented by its activities from 1982 to 1988. These activities included a number of meetings with the Elko County Planning Commission, the Elko County Commissioners, and the BLM. (Please see Exhibit 'A': Chronicle of Planning Activities.) This chronicle also includes the fact that Northern Holdings has been before the Elko County Planning Commission requesting change to commercial zoning of a portion of the impacted property.

RESPONSES

A The development plans for Northern Holdings would have been included in the impact assessment had they been made public or been on file with Elko County. Further, there was no mention of these developments during the public scoping meetings held in March 1989, during the public planning workshop held January 8, 1991 (attended only by representatives of Big Springs Ranch), or in response to the numerous newsletters mailed out throughout the over three-year EIS process.

Future planned developments by Northern Holdings and CSY Development have been considered in the SWIP FEIS/PPA (refer to Impacts to the Oasis Area on page 3-36 of this document).

B The alternative routes evaluated in the SWIP DEIS/DPA in the Oasis area were identified during the regional environmental study (refer to Chapter 2 of the SWIP DEIS/DPA), were presented to the public during the scoping meetings in January 1989, and discussed in several of the newsletters. Some of the alternative routes do deviate from the BLM-designated or planning corridors established by the Wells Resource Management Plan (1985). Some of these deviations are due to environmental issues (e.g., cultural sites and the BLM low-visibility corridor along Interstate 80) along the established corridors and some are a result of project requirements. The SWIP DEIS/DPA contains a draft plan amendment that proposes to change the utility corridors to include these deviations along the selected alternative route. If an alternative route outside of the designated corridors within the Wells Resource Area is selected in the Record of Decision for the SWIP, this decision will serve as a plan amendment to the 1985 Wells RMP Record of Decision. Refer to Plan Amendment on page 1-32 of this document for more information.

C Research with BLM realty specialists and the Elko County planning department did not reveal any proposed developments in the Goshute Valley. Refer to response "A" above.

LETTER #A-36
COMMENTS

Oasis is the only commercial development along I-80 between Wells and Wendover. It is also the only residential development in this area directly adjacent to the interstate. The proposed power line route is within one half mile of the Oasis commercial area and residence at Oasis. It is within a mile of the residences at the Oasis Mobile Home Park.

Oasis is a natural place for further development. It is at the intersection of State Highway 233 and Interstate 80. A commercial development already exists with services for the highway travelers: fuel, mechanical services, motel, convenience store, and cafe. There is a 48 unit mobile home park that serves as a residential area for the Oasis employees and people who work in Wendover. An electrical substation is located at Oasis and a substantial water system with fire fighting capabilities is in place.

D [In our discussions with representatives from the BLM, Dames & Moore, and Idaho Power, we were told that in the urban areas where the engineers live, power lines a mile away are not considered a problem. In rural areas, though, power lines of this size a mile away from people create a tremendous visual impact. This is the reason the BLM suggested moving the lines out of the utility corridor as mapped in the Wells Record of Decision (1985). If the power lines create a negative visual impact on the I-80 traveler, the impact must surely be greater on the residents of an area who have that visual impact every time they look out the window of their homes.

This became evident to Northern Holdings after the impressive turn out of Oasis residents at the public hearing. Their comments made it clear that the lines would have an even greater negative impact on the economic and development potential of the Oasis property than was previously anticipated. It was quite clear that the Oasis residents would like to see the power line as far away from Oasis as possible.

The development plan put together by Northern Holdings is phased. The early phases deal with development of the commercial area. Recently 38,000 gallons of underground fuel storage was installed. The next step is to build new fuel islands and extend a water line to connect the mobile home park water system with the water system at the commercial area. Residential subdivision is to follow the commercial area development or possibly proceed at the same time. The first area of subdivision will be in section 2 near the existing residential development at the mobile home park, within a mile of the proposed power line. Planing work has begun on this subdivision. Subdivision of section 3, the section currently proposed as the location of the power lines, would be farther down the road. There is no detailed subdivision plan of section three at the moment, but we are submitting a copy of the Oasis Master Plan that was submitted to the BLM in 1986 by Flying 'S' for the EIS on the Thousand Springs Power Project.

E [The record clearly shows the prior intent of Flying 'S', and more recently Northern Holdings, to develop the two sections at Oasis. This development would be made impossible by the presence of the SWIP power lines on or directly adjacent to Northern Holdings property.

RESPONSES

D Visual impacts were assessed from all residences along the alternative routes. Residences were considered more visually sensitive than travelers on Interstate 80. This was part of the criteria used in assessing visual impacts. Table VR-7 of Volume III - Human Environment Technical Report documents that all residences were considered to have high visual sensitivity while travelers on Interstate 80 received a moderate visual sensitivity rating (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

E Future planned developments by Northern Holdings and CSY Development have been considered in the SWIP FEIS/PPA (refer to Impacts to the Oasis Area on page 3-36 of this document).

LETTER #A-36
COMMENTS

Northern Holdings would like to offer an alternative route to the one proposed in the EIS. Since the public hearing, it has become evident that the residents at Oasis feel their lives would be adversely impacted by the relative close proximity of these lines and they would like to see the lines located as far from Oasis as possible.

F [The reason given by the BLM representatives for moving the lines out of the utility corridor and running them through the only developments in the valley was that they would be less visible to the highway travelers. With this in mind we would like to suggest that the lines be run along the foot of the hills on the east side of the valley instead of the west side. There they would be less visible than if they were in the center of the valley for both the valley residents and the highway travelers. This would place them much further away from the existing developments than if they were on the west side. There currently are no developments on the east side of the valley to affect.

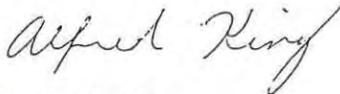
I understand that this proposal will most likely require additional study. It is unfortunate that it was not considered before, but it wasn't and we need to proceed from where we are today. This version of the EIS is a draft, and it would be best if all the options were taken into consideration before the final proposal is made in the final version of the EIS.

If it is impossible to perform another study, and the lines must be placed within existing study areas, NHI would suggest that the utility corridor in the center of the valley be considered above siting the lines on NHI property. If this alternative is selected NHI would like to see the lines located as far east in the corridor as possible. This would put the lines further away from the developed and developable areas at Oasis.

G [To be complete, the EIS must adequately address the adverse impact of the power lines on private property. In many areas the power lines may be entirely on public land. In the vicinity of Oasis, however, there is a great deal of private land and the criteria for evaluating private land should be quite different than that of evaluating public land.

In Summary: Northern Holdings Inc and the populace in and around Oasis strongly recommend that the SWIP lines be routed on the east side of the Goshute Valley, as shown on the enclosed map labeled Exhibit 'B.'

Sincerely



Alfred W. King II
for Northern Holdings Inc.

Enc. - 2
AK/dl

RESPONSES

F According to a map of the conceptual development received from CSY Development on October 7, 1992, hunting club areas and recreational use areas are proposed on the east side of the valley and south of Interstate-80. The letter accompanying the concept plan stated a preference for the rail corridor which is also the BLM's planning corridor. This corridor appears to impact the least amount of CSY's property and the conceptual development area. Another reason an alternative was not routed along the east side of the valley is because of the proximity to Bluebell WSA and impacts to low-level military flight operations in the Lucin C Military Operating Area (MOA).

G An extensive regional study was completed for this entire area and was coupled with the BLM's corridor studies completed during their Resource Management Plan process to plan a set of "reasonable and feasible" alternative routes. The regional study and alternative routes developed during this study were presented to the public during the scoping meetings in March 1989. Refer to Chapter 2 and Chapter 5 of the SWIP DEIS/DPA for a further discussion of the scoping process.

Private lands were not intentionally impacted by the routing alternatives. In fact, during the scoping process the public stated a preference for use of public lands over private lands for routing of alternatives. Private lands and environmental issues were both considered during development and refinement of the alternatives.

Visual impacts were adequately addressed and they do not overemphasize visual impacts of motorists using Interstate 80. Residences were considered the highest sensitivity viewpoints because of the long duration of views, while travelers on Interstate 80 received a moderate visual sensitivity rating. This was part of the criteria used in assessing visual impacts (refer to Table VR-7 of Volume III - Human Environment Technical Report). Refer to Appendix H of the SWIP DEIS/DPA for locations where the technical reports can be reviewed.

LETTER A-36

LETTER #A-36
COMMENTS

RESPONSES

EXHIBIT A: CHRONICLE OF PLANNING ACTIVITIES

Prior to 1981 Robert J. Beaumont, at that time the owner of Big Springs Ranch, had a preliminary plan drawn for a rest area on section 3.

On January 25, 1983, Flying 'S' Land and Cattle Company filed for "municipal" water rights for the Oasis area. These rights were granted on August 7, 1984. The rights have been maintained annually and are currently still in effect. The permit numbers are #46579, #46580 and #46581, for a combined duty of 1600 acre/feet per year.

An Oasis Master Plan was presented to the Elko County Planning Commission on October 23, 1985 by Flying 'S' as part of a request for a change in zoning and a conditional use permit for the Oasis Commercial Area. This and all other presentations to the planning commission can be verified in the planning commission meeting minutes. The Oasis master plan included additional sections other than sections 2 and 3 that are currently under consideration. The portions of section 3 under the proposed power lines are designated for Agricultural-Residential and Ag-Recreational zoning for housing.

In July of 1986 Flying 'S' and Oasis Energy Corporation presented a land use master plan to the Bureau of Land Management for use in preparing the Environmental Impact Study for the Thousand Springs Energy Project. The master plan included a proposal for residential development on section 3 on the present proposed SWIP route.

On October 22, 1986 Flying 'S' presented the master plan to the Elko planning commission requesting that the commission give an indication that they approved of the concept, that this might create a tool for attracting money for development. The planning commission seemed in favor of the idea and voiced no objections.

LETTER #A-36
COMMENTS

RESPONSES

On January 28, 1987 the planning commission unanimously approved the master plan as stated in the minutes of the meeting. A transparency of the map was left with the county engineer.

On February 18, 1987, the master plan was presented to the county commissioners. The commissioners directed the planning commission not to approve the master plan because it would be a promise of zoning.

On February 25, 1987 the planning commission under the direction of the county commissioners voted that the map was not a master plan, but only a proposal of development.

In the fall of 1987 Flying 'S' lost the title to Big Springs Ranch, retaining, however, sections 2 and 3. Alfred King was hired at that time as Oasis General Manager.

Northern Holdings acquired sections 2 and 3 from Flying 'S' on October 21, 1988. Alfred King was retained as General Manager, due partially to his experience in development planning for the Oasis properties.

On January 25, 1989 Northern Holdings, Inc. requested a change of zoning on sections 2 and 3, from Open Space to Commercial for 238 acres at a preliminary hearing before the planning commission. Steven Crane, an architect with Niels E. Valentez and Assoc., represented Northern Holdings. The concept presented at that time included a large motel, casino and recreation complex.

The public hearing for change of zoning before the planning commission was held on March 22, 1989. The change of zoning was denied because the project was too ambitious.

LETTER #A-37
COMMENTS

Dawn K. Lamb
5419 W. Tropicana #3112
Las Vegas, NV 89103

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Dawn K. Lamb

LETTER A-37

LETTER #A-38
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

CHERYL LESLIE
6920 ATRIUM
LAS VEGAS, NV 89168

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,



LETTER A-38

LETTER #A-39
COMMENTS

*JAMES E. LYTKER
359 E. Desert Inn
Las Vegas, NV 89109*

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

James E. Lytker

LETTER A-39

LETTER #A-40
COMMENTS

RESPONSES

4221 West Arby Avenue
Las Vegas, Nevada
89118-5107

September 17, 1992

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burly, Idaho 83318

Dear Sir:

I have reviewed the draft of the Southwest Intertie Project (SWIP) DEIS/DPA. I would offer some comments in addition to my oral testimony. I found the document to be a good piece of work. I am concerned with the generality of the alternatives. I would like to know which Wilderness Study Areas (WSA's) rather than the statement *that 57 miles of viewshed from WSA's will be affected*. I suspect that much of that detail was included in the technical reports. The only real complaint I have concerns the availability of the Technical Reports. The Technical Report appears to be the basis for all the substance of the SWIP DEIS/DPA document.

This report was only accessible at one location in southern Nevada. There was only one copy in southern Nevada. The report was at the

A The technical reports were prepared to document the detailed studies for the SWIP DEIS/DPA. Typically the studies are only documented in the project files and available for public review upon request. However, for a project the size of the SWIP it was considered important to publish a limited number of copies of these studies and make them reasonably accessible to the public.

Additional sets of technical reports have been sent to public libraries in several towns to make them more available for review. Refer to Appendix H in the SWIP DEIS/DPA and the Errata in Chapter 4 of this document for the locations where these technical reports can be reviewed.

LETTER #A-40
COMMENTS

RESPONSES

Las Vegas District Office of the Bureau of Land Management (BLM) and, while the person¹ in charge of these reports was most gracious and helpful, access was limited to normal working hours. I recognize that these *Technical Reports* are expensive to produce, however additional

B This is corrected in the Errata in Chapter 3 of this document.

¹Her name is Jackie and I compliment her. Her name is not listed in Chapter 6 of the document

copies should have been available. I am sure that had there been more than one copy a person could arrange to borrow a copy for a weekend or such. I quickly skimmed the Volume IV of the Technical Reports and found some things I questioned. I was really surprised when I was told that copies were not available. I only had one additional opportunity to review these documents. I did return to the District Office and with limited time (about a half an hour) did again review parts of Volume IV of the Technical Report. The incomplete comments on the technical report reflect my lack of access to these documents.

I have attempted to comment on specific passages. Each passage is referenced by page and paragraph. This reference will be the page number of the initial sentence of the paragraph even though that paragraph may continue onto an additional page.

Comments on Technical Report

B [Page 9-37 Southern Nevada was part of the New Mexico Territory in the 1850's. The Post Office name in 1857 for mailing to present

LETTER #A-40
COMMENTS

RESPONSES

B day Las Vegas, Nevada was Bringhurst because of the confusion with the *other* Las Vegas, New Mexico. The southern portion of Nevada was never part of Nevada Territory. It was added to the State of Nevada in 1867 after the Territory of Arizona (1863) was created. The next to last sentence on this page needs to be modified to reflect that southern Nevada was part of New Mexico Territory until two years after Nevada Territory was created and then was *Pahute County, Arizona Territory* until January 1867 when it was added to Lincoln County, Nevada. A small point, but one caught quickly skimming the document and one that makes me suspect of the rest of the Technical Reports.

C Page 9-38 Paragraph 1 is erroneous. Jedediah Strong Smith did follow the Virgin River² and he did enter present day Nevada, then Mexican Territory at about the present day town of Bunkerville and did continue down the Virgin river until it merges with the Colorado River. This is where the error begins. Smith did not travel through Nevada to the Needles area. He did cross the Colorado into Arizona and traveled around the rugged Black Canyon area one valley west of the river. Again a small point but this was the second page I read³ of the only Chapter is glanced at within the technical reports. Since there were at least four books of technical reports that concerned me, (*and additional books of data tables I found uninteresting*) and I had only read a page and a half, I was getting concerned.

D Page 9-38 Paragraph 4 could be improved. Antonio Armijo did follow the Nevada side of the Colorado from the Virgin River into present day Nevada. Unlike Jedediah Strong Smith, who crossed

C This is corrected in the Errata in Chapter 3 of this document.

D The BLM report by Keith Myhrer and others (1990), which is cited in the technical report, reviews the ambiguities regarding Armijo's route. Any proposed connection between the Dry Lake and McCullough Substations (e.g. the Marketplace-Allen Transmission Project) will have to consider impacts on cultural resources, including any remnants of historic trails.

LETTER #A-40
COMMENTS

RESPONSES

the Colorado there both times, Armijo and his caravan continued down the Nevada side of the Colorado until reaching the Las Vegas Wash. Armijo's group then headed westward into the Las Vegas Valley and on to California. There is some dispute on the route taken out of the Las Vegas Valley but the route into the Las Vegas Valley crosses the proposed route for the connection from Dry Lake Valley to the McCullough Substation. I suspect that connection is an essential link in this project even if not included in the DEIS/DPA. Armijo was here in January, while Yount and

D ²The proper name for this river should actually be the *Rio Sulfureo de Las Piramides* as named by the Dominguez-Escalante Expedition in 1776. Jedediah Strong Smith did name the Virgin river. I've been told it was named for one of his fellow trappers, and so the story goes, after the trapper was slain by the Mojaves near Needles, California. I've heard the story but cannot cite a source. If that story is true then the river was named in his honor sometime in 1828 or 1829.

³Southern Nevada history is an avocation of mine. I selected this because I am familiar with this subject and frankly was spot checking the accuracy of the technical reports.

crew did not show up until fall. Yount traveled the same route as Jedediah Strong Smith's previous two trapping expeditions. Since Yount was later and traveled mostly through Arizona, I suggest more emphasis on the Armijo Route.

I did not peruse paragraphs 2 and 3 because I am less familiar with Northern Nevada. I was really getting suspect about the Technical Report at this time. This elusive document which was sequestered in a limited amount of places, appears to need more public review.

LETTER #A-40
COMMENTS

RESPONSES

E [The thing that prompted me to return to the District Office to further review the Technical Document was was an apparent error I found on August 20, 1992 at the hearing. I thought I remembered reading about the native southern Nevada Nuwuvi⁴ that implied that bear was an important food source and that there was a reliance on winter communal rabbit drives. I thought that the reference cited was Robert Lowie. There is no such reference in Appendix A of the DEIS/DPA. I glanced at this at the public hearing and could not relocate it that night, nor on my subsequent visit because I ran out of time before rereading that portion. I mention this because I would have liked to pursue this further.

I hope to have some, even if limited, future access to the Technical Reports. It goes without saying if an extra set of these Reports was available I would gladly accept them. I request a bibliography of citations in the technical reports on the assumption that those citations are different from the references cited in the SWIP DEIS/DPA Appendix A.

⁴The Nuwuvi are called Southern Paiute in the DEIS. Nuwuvi is to my mind the proper name for these indigenous peoples.

E Isabel T. Kelly and Catherine S. Fowler report that the Southern Paiute hunted rabbits individually and in drives, and bear was not a significant game animal. ("Southern Paiute" in *Handbook of North American Indians, Volume 11: Great Basin*, Smithsonian Institution, Washington, D.C., 1986, page 370).

LETTER #A-40
COMMENTS

DEIS/DPA

F Page 1-11 An *open marketplace* requires a connection with the McCullough Substation. Since that connection must run through an Instant Study Area (ISA) that awaits Wilderness Legislation that may not occur this century and this Wilderness Study Area (WSA) blocks the connection. I suggest that the SWIP may be premature. G

G Page 2-5 Energy conservation has a direct impact on local requirements. Local requirements have a direct impact on regional requirements. I fail to see how energy conservation can be eliminated from further discussion simply because energy conservation cannot *alone* be the answer. Why isn't energy conservation and a scaled-down interconnect a viable alternative? I believe that energy conservation should be an integral part of every alternative.

G Page 2-5 Alternative methods to generate electricity, especially those that do not consume fossil fuels, are important. Again, alternative methods of power generation may not *alone* be a solution but why isn't alternative power generation and a scaled-down interconnect a viable alternative?

Page 2-5 If energy conservation and alternative generation methods were incorporated then perhaps "*the need to transfer power across these paths*" would not exceed "*their capacities*".

Page 2-7 If taken as a package unit which includes energy conservation, alternative methods of power generation, and an improvement of existing transmission systems, I question if this document can assert that interconnect access from the northwest would still be needed?

RESPONSES

F It is correct that a connection to the proposed marketplace substation near the McCullough Substation would require a transmission connection through the ISA. Other marketplace substations are planned along the path of the SWIP as outlined in the SWIP DEIS/DPA on page 2-14. In fact, the planned Dry Lake substation at the southern end of the SWIP will be part of the open marketplace concept. Because planning, permitting, and engineering for projects the size of the SWIP take many years to complete, it is necessary to consider foreseeable future actions that may be related to the project.

G Conservation and demand-side management are an integral part of the resource strategy of every utility considering partnership in the SWIP. Federal and state regulatory requirements dictate that supply-side and demand-side resource options be considered on an equal basis in a utility's plan to acquire lowest cost resources. Conservation and other demand side management programs are expected to reduce, but not to eliminate, the region's need for new generating resources.

Transmission facilities would contribute in several important ways to the task of the region's utilities to meeting future load growth in the most efficient manner possible and with the smallest amount of new generating capacity. First, it is important to recognize the available seasonal load diversity in the West (refer to Figure 3-1 in Chapter 3 of this document). Transmission facilities can allow existing resources to be used to serve seasonal load requirements in one part of the region while also meeting new load growth requirements in another part of the region. Therefore, total regional resource requirements (e.g., generation) can be reduced by using transmission. Then, when new regional generating resources are needed, transmission, such as the SWIP, would make more resource options available, and should help minimize costs and environmental impacts.

LETTER #A-40
COMMENTS

RESPONSES

G Page 2-7 If taken as a package unit which includes energy conservation, alternative methods of power generation, and an improvement of existing transmission systems, I question if this document can assert that interconnect access from the northwest *could not* be scaled-down. I believe that this package along with a scaled-down interconnect would be a viable alternative?

H Page 2-7 This *significant additional transmission reinforcement* for voltages higher than 500kV suggests to me that as a member of the public I can have bigger, uglier, sturdier, transmission lines or accept the increased energy loss. Do higher voltage lines have less loss? If one 500kV line will handle the anticipated load then the 765kV voltage option does not need to be considered *unless* there would be less energy loss with the transmission of higher voltages. The squandering of non-renewable resources should always be considered. Again, does higher voltage mean less loss, or just less amperage for the same wattage.
This project does not exist in a vacuum. The White Pine Power Project (WPPP) threatens to run three more of these lines to Dry Lake Valley. If we could reduce that number of transmission lines by running 765kV or higher voltages then "*the western system*" should consider using these higher voltages.
Could not a package which includes energy conservation, alternative methods of power generation, and an improvement of existing transmission systems reduce the 1200 megawatt objective.

I Page 2-7,8 Does DC travel greater distances with less loss? If that is the case then the added expense must be weighed against the value by reducing the loss of energy. Since the increase in carbon dioxide

H A single 765kV transmission line, by itself, would not have greater system capacity than the proposed 500kV transmission line. While the 765kV transmission line capability theoretically would be about two to three times greater than a 500kV transmission line, the system to which it is interconnected must be able to withstand its outage. For a transmission line of the length of the SWIP, it is this *system* capability that determines the line capacity. For the foreseeable future, the WSCC system would not be able to withstand the outage of a 765kV transmission line because it would be the WSCC's largest single hazard.

Perhaps in 50 to 100 years, the WSCC system may have developed a sufficient 765kV system to support a 765kV transmission line of the length and location of the SWIP.

I A DC transmission alternative for transmitting 1200 MW of power from the Midpoint Substation to the Dry Lake Area would cost about \$488 million (\$200M for line and \$144M for each line DC substation terminal) compared to \$356 million for the proposed AC transmission line. As pointed out in the SWIP DEIS/DPA, the ability to tap is considerably more difficult with a DC transmission alternative. The cost of each tap is an order of magnitude greater (\$100+ million vs. \$10 million) and is not included in the \$488 million estimate for the basic transmission line.

The actual efficiency of a comparable DC alternative would depend upon the design of that system (i.e., voltage rating and conductor selection). For example, the Pacific DC Intertie transmission line has been upgraded twice in its history, once to increase its voltage rating and the other to increase its capacity rating. The line was originally designed to operate at 1600 MW and +/- 400kV. A 1200 MW flow at +/- 400kV would have generated 8.6 percent loss. In the 1980s, the Pacific DC Intertie was upgraded to +/- 500kV and is now capable of transferring 3100 MW. For a 1200 MW flow on the current DC system, the losses would be about 5.7 percent compared to 6 percent for the SWIP.

LETTER A-40

LETTER #A-40
COMMENTS

RESPONSES

I [(CO₂) by the rapid consumption of non-renewable fossil fuels may have climatic, environmental and political repercussions, I would hope that the use of Direct Current Transmission⁵ would not be dismissed so quickly. J

Page 2-9 I concur that the adverse effects do not outweigh the cost and adverse effects of digging up the desert to run power through it.

Page 2-9 Could not the potential of new transmission methods be viable answers if we use energy conservation, alternative meth-

⁵If indeed Direct Current Transmission has lower loss.

ods of power generation, and improve existing transmission systems. This would allow the postponement of this action until such technology⁶ is commercially available.

K [Page 3-3 Why does Jarbidge rate above Great Basin National Park? Why does Jarbidge rate above the Ruby Mountain Wilderness Area? What specifically is a Prevention of Serious Deterioration (PSD) Class II area? How does a PSD Class II area differ from a PSD Class I area? Who ranks these areas? Why does our National Park get shorted? This paragraph raised many more questions than it answered as far as I am concerned. L

L [Page 3-5 Soils in "true desert" may erode easily and they may not. The composition of the soil determines that far more than the lack of moisture attributed to being a "true desert". Muck about with the surface of chaparral, sagebrush or pinion-juniper and if the base is silt it will erode once the protective vegetation is disturbed.

The feasibility of superconducting transmission lines has not been demonstrated. For superconducting overhead transmission to be feasible in the future, the operative temperature would need to be ambient air temperature instead of the supercooled condition which is required under the current technology. Sub-ambient air temperature superconducting transmission would generally be installed underground with its associated costs and technical difficulties.

At the present time there is no scientific evidence supporting the hope that this transmission technology will be developed in the next 20 years. As a result, superconductivity is not believed to provide a basis for the delay of the SWIP.

During preparation of the SWIP DEIS/DPA, an error was made with regard to the identification of Class I and Class II PSD areas near the study area. Jarbidge WSA is not the only Class I area. It is one of three. The other two Class I areas are the Great Basin National Park and the Mt. Moriah Wilderness Area.

The PSD classes and the regulations governing the classification of areas are described and corrected in the Errata in Chapter 4 of this document.

True, all desert is not the same. The statement about desert soils in Lincoln, Nye, and Clark counties is general. The erosion hazard potentials vary as is indicated in the SWIP DEIS/DPA; Table ER-5 (Descriptive Summary of Soils by Corridor Link), Table ER-6 (General Soil Units in Project Area), and Table ER-7 (Summary of Soil Resource Inventory) in the *Volume II - Natural Environment Technical Report*; and the Ground Disturbance Impacts to Soils table in the *Data Tables for Natural Environment*. The construction methods, including rehabilitation of all disturbed areas, will be planned in detail during the development of the Construction, Operation, and Maintenance Plan (refer to page 1-34 of this document).

LETTER #A-40
COMMENTS

RESPONSES

Muck around in desert with rocks in the soil and the first frost after a rain will repair the surface and erosion will not necessarily be a problem. If the desert is silt, fine sand, or whatever you have a problem. If it's coarse sand like decomposed granite you don't. All desert is not the same! Take that from a motorcycle racer who has twenty-five years experience in locating race courses where the longterm effects are negligible, and avoiding areas where the soil types invite erosion. There are portions of your proposed route that traverse sections⁷ any responsible race promoter would avoid because they are so sensitive to surface disturbance. The dryness of the region does influence erosion. Flash flooding does

M The Midpoint to Dry Lake segment of the SWIP would be operated and maintained by the IPCo. The IPCo proposes to request that the BLM assign the Ely to Delta segment right-of-way grant to the LADWP which would construct, operate, and maintain the transmission line on this segment of the SWIP. Both utilities are concerned about vandalism (e.g., shooting insulators, etc.) as well as the potential liability of sanctioning use of their rights-of-way for other uses (e.g., motorcycle races). However, the LADWP, the IPCo, and affected land management agencies will work with any organized group that has a legitimate reason to utilize their rights-of-way, if their liability concerns can be satisfied.

⁶Transmission line loss over long distances has got to be a major waste of energy resources. Superconductors or some other future technology may well be the answer to such losses. If we can postpone construction until such technology is developed we may not need to further degrade our public lands

⁷Link Number 671 goes through such an area while the soil six miles west is much more stable. This is link number 671. I would have liked to see the route west of the dry lake north of US 93 followed but continuing north to intersect link 673.

cause erosion and disturbed soils do erode faster than undisturbed soils, however the soil type is the primary factor in determining the erosion potential.⁸ All soils erode but some erode a lot more than others.

Page 3-34 This is where you discuss dispersed recreation activities. Power lines provide roads which allow access and on an individual basis allow access without significant further environmental impact. These roads might be welcome if they did increase the numbers of those seeking access. The cumulative effects of in-

creased access may outweigh the positive effects that low impact access provide. The first goal of the Sierra Club was to "*explore, enjoy, and render accessible...*"⁹ the wildness of the region. The enjoyment of these features, so long as that enjoyment does not significantly degrade the land, should be encouraged. Powerline access roads fill a valid role in the management of the public lands for the public.

M

This is one of those places that the SWIP DEIS/DPA fails. There may be no way to include these benefits to the public because these benefits do not depend on what is decided in this action but the *attitude* of the power company that maintains them. As a user of these lands openly question what kind of a neighbor we will get. Will it be Idaho Power or will they turn their line over to the Los Angeles Department of Water and Power? What kind of public responsibility can we expect? It has been my observation that those power companies that service the area where the transmission lines are located make good neighbors. The Lincoln County Power company (?) and Nevada Power Company have always been good neighbors. The California Power companies bring their 'Califphobias' across the border and often don't make good neighbors. What kind of a neighbor are we getting? Will this

⁸I ain't a geologist but I'll stake my poke that's true.

⁹The Sierra Club's first stated purpose was "to explore, enjoy, and render accessible the mountain regions of the Pacific Coast."

LETTER #A-40
COMMENTS

M neighbor make a concerted effort to discourage others from using his right-of-way? Can amicable relations be established? Can responsible individuals hunt without being accused of "only shooting insulators"? Can a motorcycle race be routed along an access road without unnecessary protestations from the power company? The point is one of attitude. The vast majority of land users are responsible. These users sympathize with utilities over such irresponsible actions. The attitude of the power company is much more important than requirements written into an Environmental Impact Statement (EIS).

N Page 3-65 The Pahrocs and parts of the Delmar Range also offer viewpoints that if known better would make your list. There is no reason to believe additional *special places* don't exist along the proposed corridor. These hidden treasures are important to those who do currently enjoy them. A transmission line is not a welcome addition to a pristine area. The routes selected show planning, an attempt to reduce or mitigate effects where possible, and they may indeed offer the less offending routes **BUT** they will still offend and they will still intrude on the wildness, wonder, and solitude of the land.

O Page 3-72,82 High voltage, the megawattage and extent of the effects of this megawattage are of concern to me. While I am pleased to see the extent of consideration developed in the DEIS/DPA, I still urge mitigation. Ground potential differences trouble me. I am not versed enough in such hazards to adequately comment. I urge those responsible to follow through on this assessment. The pile of evidence is mounting and it does not appear to be very good.

RESPONSES

N There may be special places along the alternative routes that may not have been considered as sensitive viewpoints. However, the BLM has considered all important viewpoints that we are aware of or were disclosed to us by other agencies, interested organizations, and the public during the several years of studies for the SWIP DEIS/DPA process.

O The known effects of EMF are disclosed in Chapters 3 and 4 of the SWIP DEIS/DPA. EMF is an especially difficult issue and conclusive results may not be known for years. Refer to the EMF sections in Chapters 3 and 4 of the SWIP DEIS/DPA and the Recent EMF Research section on Page 3-19 of this document for more information. Also, refer to the grounding standards that would be utilized for the SWIP on page 3-19 and the mitigation measures #11 and #16 in Table 1-6 in Chapter 1 of this document.

LETTER A-40

LETTER #A-40
COMMENTS

Page 4-69,75 Your document, my knowledge of existing regulations, and responsible public interest are sufficient to assure me that cultural resources will be adequately addressed.

Page 4-78 Utility corridors scare me. That damnable Kern River Pipeline is a utility. The wholesale destruction to habitat, the devastation of the land surface, and the longterm visual scar produced is appalling. Every action needs environmental review! Another pipeline fiasco cannot be allowed to happen. The concept of utility corridors scares me because they reduce the future responsibility of agencies to properly manage our public lands.

P [Page 4-78 The WPPP and the Utah-Nevada Transmission Project (UNTP) cannot be divorced from the SWIP. There is a degree of co-dependency even if each project could stand alone. Together these projects exceed the sum of their separate analyses. The cumulative effects of these projects must be considered. The role of each project must be considered from the broader perspective of the overall development of a western regional grid.
The connection between Dry Lake Substation and the McCullogh Substation is critical. This issue is not decided and the results of that decision are critical to any analysis of the SWIP.

Q [Page 4-88 The Thousand Springs Debacle has been abandoned. This was a misconceived plan much better solved with energy conservation. The fact that this is listed makes me suspicious. So does the Thousand Spring Facility Siting Area. Can I expect to see an attempt to resurrect this threat¹⁰ to the best air in the our nation?

R [Page 4-89 That 'or' at the end of the fourth line is mighty scary. Does that imply that if the SWIP corridor is utilized that Clark County

RESPONSES

P The cumulative effects of the WPPP and the UNTP have been evaluated in the SWIP DEIS/DPA (refer to Chapter 4). The SWIP DEIS/DPA process does not attempt to be a programmatic EIS, as you suggest it should. It is instead a proposed project with a specific purpose and need that is in no way dependent on the success or failure of the WPPP or the UNTP. Refer to response G above, Chapters 2 and 4 of the SWIP DEIS/DPA, and the Marketplace-Allen Transmission Project section on page 3-14 of this document.

Q The SWIP is in no way tied to the Thousand Springs Power Project. However, NEPA requires that "foreseeable" future projects be addressed under cumulative effects. The Thousand Springs Power Project was a current proposal during the SWIP EIS process. It appears now that it has been withdrawn from further consideration.

R There is no intent to imply anything about the Clark County water project. However, it was necessary to address it under cumulative effects as a reasonably foreseeable future action.

LETTER #A-40
COMMENTS

RESPONSES

R [can construct a 36-inch pipeline without environmental review? After the Kern River Pipeline fiasco, such a possibility is not acceptable. I have seen what irresponsible pipeline construction can do to our public lands and it will not happen again!

Page 4-89 The Kern River Project was way too destructive. Federal and State biologists are not the only ones concerned about the effects of such an action on the land. Tortoise migration, habitat, and my visual sensibilities were offended by that project.

¹⁰The Thousand Springs Site was in the middle of the location of the least polluted air in the continental United States.

Page 4-90 I return to the world of energy conservation. I reject any alternative that does not include energy conservation as an integral part of the proposal.

Page 5-4 Distribute the technical report to those who express an interest.

S [Page 5-10 I attended the workshop in Las Vegas. I objected to the east side route because of the silty soil on the east side of that valley. I championed a corridor route that ran due south from about mile 3 of link 673 to mile 33 of link 671 and then down the west side of that valley to Link 690. I am saddened to see that my objections and preferences were not recorded. I am discouraged to see that they were not even considered. I resent the statement that "*no route preferences were recorded at this meeting*" because I indeed raised them at that workshop.

S The suggested routing alternative would not respond to concerns of Nellis Air Force Base for potential conflicts with low-level flight operations. Further, impacts to the silty soils on the east side of Dry Lake Valley are more easily mitigated than are other potential impacts. The statement that there no routing preferences were recorded at the Las Vegas public workshop was an error that has been corrected in the Errata in Chapter 4 of this document.

Conclusion

I expressed my concerns at the public meeting. I found the document to be done professionally and for the most part accurately. I do have general concerns about the following:

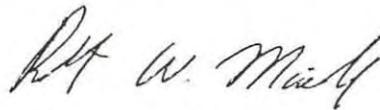
- Corridors should not automatically allow the construction of other utilities. This especially means pipelines and other surface threatening actions.
- Future utility use of these corridors should be subjected to the same judicious, environmental, cultural, and economic review.
- Whatever can be done should be done to assure that the utility that has the final control over the transmission line acts like and is a good neighbor.
- Energy conservation should be included in all alternatives.
- The SWIP is a piece in a much larger puzzle. Environmental review of the total package should be included.
- Any option that would reduce or lessen the consumption of fossil fuels should be considered. The time to worry has past and the time to act is now. Global warming is a threat that must be taken seriously.
- The loss of energy through transmission line loss should be minimized. Any option that would accomplish that should be considered.

LETTER #A-40
COMMENTS

T [The scoping process suggested benefits that I could not find in this document. Is there a potential to lose the benefits of renewable energy such as when water goes over a spillway during spring thaws? This concern was important to me. Could we bank additional energy in Lake Mead if this project was completed? Allowing this lake to rise in the spring protects the fry. What precautions will be utilized to protect birds from high tension lines? Will anything be done to promote birds like eagles that could use these transmission towers for nesting sites? U [Did I miss this?

I thank you for your effort in this draft. I would like a copy of the first four volumes of the technical report. I do want a copy of the references cited in the technical report. I do wish to review the final EIS.

Sincerely,



Robert W. Maichle

RESPONSES

T Traditionally, the Northwest has not foregone energy production by spilling water past unloaded turbines because of a lack of regional transmission capacity. During the spring runoff period, thermal generation in the Northwest is either off-line for annual maintenance or at minimum operating levels allowing utilities to absorb most of the region's hydro generation. If hydro generation exceeds the Northwest's needs, additional energy may be delivered to the Southwest using the SWIP transmission line. This low cost hydro energy could displace higher cost resources in the Southwest.

U There are no plans to encourage species such as golden eagles to use the transmission line towers for nest sites. It is likely that eagles will utilize towers for nesting without nest-site enhancing structures being placed on the towers. Interestingly, the use of towers for nest or perch sites along some portions of the route, especially in northeastern Nevada, is considered to be a negative impact to sage grouse, which may be preyed upon by golden eagles.

Refer to Avian Collision Hazard on page 3-89 of this document.

LETTER #A-41
COMMENTS

KEN MILLER

50 ALAMO
BERKELEY, CA 94708

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

Dear BLM

9/15/92

I am writing to condemn the proposed powerlines from Idaho to Las Vegas. There is no REAL need to violate the beauty of the landscape or endanger wildlife when existing right-of-ways would suffice - even if the energy were appropriate & necessary which is very controversial.

Please put your efforts into preserving the hawk migration route, archaeological & historical sites, and scenic open valleys all of which would be detrimentally affected by these ugly, noisy, hazardous powerlines - and the work to build & maintain them.

LETTER #A-41
COMMENTS

RESPONSES

Thank you for your consideration of my comments,
sincerely,
Ken Miller

LETTER #A-42
COMMENTS

September 10, 1992

Mr. Karl Simonson
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, ID 83318

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
SOUTHWEST INTERTIE PROJECT

Dear Sir:

A [I am very concerned about the Crosstie route, and the choice by BLM and by LADWP of the 230KV Corridor Route. I feel it is the responsibility of land managing agencies to select the best alternative for the environment. It is hard for me to understand why BLM did not choose the environmentally preferred Cutoff Route.

Great Basin National Park and the Mount Moriah Wilderness Unit of the Forest Service are national treasures located in a rural area of Nevada. They should be held in trust for future generations without additional development that would degrade their values.

B [The environmental damage that would be created by a 500KV line is of a much greater magnitude than the damage associated with the present 230KV installation. New groundbreaking and associated clearing would remain in this area for probably centuries, and the 500KV line would be much better located away from our National Park. The old 230KV lines were not subject to as much environmental scrutiny as projects of today, so I would not think that consolidating corridors reasoning should be the reasoning that is considered for this project. Great Basin National Park had not been established, and the Mount Moriah Wilderness had not been designated at the time the 230KV line was installed. Those wooden poles are relatively inconspicuous, and from a distance they blend in with the terrain, BUT they are also not pleasing to see in this pristine setting. I would hope that the Bureau of Land Management would not select this route today for the 230KV lines, so the 500KV line, with its proposed steel towers should not be considered to add to this environmental damage.

RESPONSES

A The BLM used nine selection criteria as described on pages 2-56 and 2-57 of the SWIP DEIS/DPA. The selection of the 230kV Corridor Route as the Agency Preferred Route is explained on pages 2-57 and 2-58 of the SWIP DEIS/DPA. Also refer to the Cumulative Effects section on page 3-12 of this document.

B It is true that visual impacts will occur if this project is constructed. The visual impacts are disclosed and documented in the SWIP DEIS/DPA on pages 4-35 through 4-45. Wood pole H-frame towers do tend to be perceived as more acceptable, visually, in foreground views. However, it is also true that in most landscapes, steel lattice towers tend to be less visible at a distance than the wood pole H-frame towers, or in this case, corten tubular steel H-frame towers. Note that the corten tubular steel H-frames (visually similar to wood towers) have been used as visual mitigation in foreground views at the crossings of U.S. Highway 6/50 and may also be used in other areas.

LETTER A-42

LETTER #A-42
COMMENTS

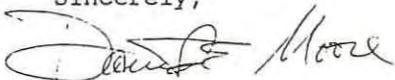
The people of Nevada now have a National Park in the Snake Range after many years of work to create this through legislation. This site was chosen over seven other areas in Nevada and Utah, because the Snake Range showed both the basin and range in a relatively pristine condition. This provides interpretive and educational possibilities for all people, and powerlines would detract from that experience...OR the powerlines would provide the view that would show the land management to be insensitive, uncaring, or not responsive to the environment. I feel BLM should be above just taking the easy way, and consider the environment first in all selections. The view and quality of the present experience would be fundamentally changed and have a negative impact.

I feel the alternative route for the Crosstie that was worked out during the scoping process, and designated as the environmentally preferred Crosstie route is the best for all concerned, including the Bureau of Land Management. The Cutoff Route avoids major visual damage to Great Basin National Park and the Mount Moriah Wilderness, and is preferable for most other human and environmental reasons also. Your document reports to be committed to minimize environmental impacts whenever possible even at reasonable increased project costs. This commitment would be verified by placing the lines on the Cutoff Route. I feel the Cutoff Route has a much less environmental impact to the National Park and Wilderness and also to the people who live in this area.

C [I would first recommend NO ACTION, since no need for the Crosstie was demonstrated. If any action is necessary, then I would strongly recommend the Cutoff Route to protect Nevada's only National Park and surrounding wilderness areas from this significant environmental impact.

I appreciate you considering my comments when you make your decision. I hope your decision is based on what is best for the land on this earth, and especially ours here in Snake Valley.

Sincerely,



David E. Moore
P. O. Box 91
Baker, Nevada 89311

RESPONSES

C The purpose and need for the Ely to Delta segment of the SWIP has been expanded in this document (refer to Chapter 3). Your comments will be considered during the BLM's decision process.

LETTER #A-43
COMMENTS

Mia Mia Palmeri
2235 Winckler Drive
Henderson NV 89014

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Carl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Mia Mia Palmeri

LETTER #A-44
COMMENTS

*Stella R. Quinto
8085 CANTO AVE
LAS VEGAS, NV 89117*

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely, *Stella R. Quinto*

LETTER A-44

LETTER #A-45
COMMENTS

Comments on draft EIS — Southwest Intertie Project

To: Mr. Karl Simonson
Bureau of Land Management
Burley District Office

A This EIS goes into considerable detail describing the impacts the SWIP would have on the areas it might run through. The differences in various impacts along the different proposed routes are also laid out in detail. However little attention is given to mitigation of these impacts, except in a few specific cases such as through Pashranagat Wash. General mitigation measures, especially applying to construction activities, are described briefly in one table; but the benefits from these mitigation efforts are not evaluated with any care.

B The impact of the powerline, as described in the EIS, will clearly be quite significant; and evidently it will not or cannot be mitigated. Although the EIS makes a quick reference to the economic justification for this powerline, there is no credible attempt to balance the environmental impact against the alleged economic benefits. In fact, it appears that in one case where costs might be higher (the option of a route along existing corridors through Salt Lake City), that is the basic reason to exclude the route from further EIS consideration. Since arranging access rights along the route from other utilities and working out a suitable passage through Salt Lake City are hardly unsolvable problems, and since the

RESPONSES

A The impacts described in Chapter 4 of the SWIP DEIS/DPA are those remaining after applying the mitigation measures found in Tables 1-5 and 1-6 of this document. The process of considering mitigation for each specific impact location is described on page 4-2 of the SWIP DEIS/DPA. Additional information on the impact assessment/mitigation planning process is found in each of the technical reports (refer to Appendix H in the SWIP DEIS/DPA).

B Dropping the routing options through Salt Lake City from further consideration does not make the SWIP DEIS/DPA incomplete or flawed. On page 2-31 of the SWIP DEIS/DPA there is a discussion of the SWIP's need to be expanded from the Ely area to Dry Lake (northeast of Las Vegas). The first two paragraphs of page 2-10 of the SWIP DEIS/DPA discuss the elimination of the Salt Lake City alternate route. The additional length required by this route from Midpoint to Dry Lake has two effects: 1) the capacity drops significantly (to 600-800 MW) and 2) the cost increases proportionally. The result of these two effects makes the route uneconomical and unreasonable. There are also obvious impacts associated with routes through the Salt Lake City area (very significant land use and visual effects). Please refer to Chapter 1 of the SWIP DEIS/DPA and Chapter 3 of this document for more information on the Purpose and Need for the SWIP.

LETTER #A-45
COMMENTS

B [excluded route would have better met various environmental goals stated at the beginning of the report, I feel its exclusion is symptomatic of ways in which this EIS is incomplete and flawed.

C [The EIS claims that public policy should favor this project because it increases the opportunities for economic competition between utilities. Yet I should think the goal of an open marketplace in the grid system could be well achieved just by legally preventing other utilities from maintaining monopoly-like control over alternate routes. As it is, this project looks like a large contribution of public resources for the specific benefit of Idaho Power.

D [Maintaining them as public lands has been one of the few forces preserving what few remaining open spaces remain in the US. Every effort should be made to leave our few remaining pristine desert valleys in their current state. Yet the EIS seems to presume that public policy is to do just the opposite. In many cases the powerline could be run through already impacted lands such as those used for ranching, mining, by the military, or that are privately owned. Yet the EIS explicitly prefers to bypass such impacted routes and instead to consume more of the pristine public lands that are a rapidly disappearing national resource. The EIS never attempts to justify this bias, not as a rational public planning decision, nor on environmental grounds.

RESPONSES

C The SWIP would not create a monopoly-like control in the utility industry. In fact, the converse is true. On page 1-11 of the SWIP DEIS/DPA it is stated that the SWIP is a "new concept where buyers, sellers, and wheeling utilities are part of a coordinated group that allows them to transact business with each other without burdensome wheeling charges, access policies or other barriers to trade."

D On page 5-7 of the SWIP DEIS/DPA it is stated that during project scoping, the public voiced preference for alternative routes to cross public lands rather than private lands. Nevada is largely public lands managed by the BLM. The BLM attempted to avoid private lands where possible. However, for the most part, there was little choice but to cross either some public or private land on the various alternative routes. The impacted lands were not avoidable. In southern Idaho the alternative routes cross large parcels of private lands that are irrigated agricultural areas. In these areas the routes impact farming operations. Most of the alternative routes were routed along existing roads to minimize both ground disturbance and increased public access into remote areas. Many of the alternative routes also utilize designated utility corridors parallel to existing transmission lines (refer to the Land Use Map in the SWIP DEIS/DPA Map Volume).

LETTER #A-45
COMMENTS

E More pernicious yet, however, are the cases where a route is justified based on misplaced "environmental" criteria. This is most particularly the case where so-called "visual impact" is considered. The "visual impact" criteria show no respect whatsoever for preservation of intact open spaces. Instead, the impact is said to be greater when the powerline is visible from areas already impacted by human activities, and less when the powerline is routed through previously pristine remote desert valleys where it would totally devastate existing visual qualities. This turns the concept of environmental impact on its head! There are precious few places one can travel nowadays, whether by vehicle or foot, where human impacts are not terribly evident.

F Finally, note that all proposed routes threaten desert tortoise habitat north of Las Vegas. This is an area that was devoted to providing safe desert tortoise habitat, having been traded for other areas in the immediate Las Vegas vicinity to allow continued development there. Consequently it now deserves more stringent protection. While the EIS notes how the proposed powerline would further threaten tortoises, it offers no effective mitigation measures at all, and no route alternatives are proposed to avoid this impact.



David G. Raich
2463 Scenic Avenue
Oakland, CA 94602
3 September 1992

RESPONSES

E Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although undisturbed natural landscapes of open desert valleys possess inherent scenic value, the scenic quality of these areas is considered "minimal" to "common" based on the definitions of scenic quality used in the VRM System. Scenic quality classes are determined in context with the regional landscape character. Open desert valley landscapes are characteristic and common to the project study area. The BLM will consider public concerns for scenic quality in its decision process. The BLM uses the VRM system to manage the visual resources of public lands. For a detailed explanation of the VRM System and the visual impact assessment model refer to the methods section under Visual Resources in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

F Construction of the SWIP north of Las Vegas, Nevada will have some impact on desert tortoise habitat. However, judicious planning and careful monitoring during the pre-construction and construction phases of this project are expected to reduce impacts to desert tortoise to indiscernible levels. Soil disturbances resulting from activities at tower sites and other construction areas may actually enhance growth of spring annuals and increase the forage base for tortoises in the area of construction.

LETTER #A-46
COMMENTS

RESPONSES

Mr. J. M. Jensen

Dames & Moore Project Manager

for Environmental Studies

PO Box 1601

Boise ID 83701

August 7, 1992

A Your comments are noted and will be considered in the BLM's decision process.

Dear Mr. Jensen:

Please limit the SWP transmission
to areas whose natural beauty &
cultural value will not be compromised
by it.

Thank you.

Sincerely,

John Savarese
74 Mobile Ave.
Station Island
NY - 10306

LETTER #A-47
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Terri Schilling
3412 Miramar Dr
LV. NV 89108

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Terri Schilling

LETTER A-47

LETTER #A-48
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

SEPTEMBER 6, 1992

KARL SIMONSON
BLM, BURLEY DISTRICT
RT. 3, BOX 1
BURLEY, ID 83318

SIR:

THERE ARE TOO MANY ADVERSE AND
UNNECESSARY IMPACTS TO VIEWS,
TURTLES, RAPTORS AND THE GREAT
BASIN NATIONAL PARK TO PERMIT
ANOTHER UTILITY CORRIDOR OR POWERLINE
FROM LOAHG TO LAS VEGAS VIA
EASTERN NEVADA.

LETTER A-48

LETTER #A-48
COMMENTS

RESPONSES

"NO ACTION" IS THE RIGHT
ALTERNATIVE REGARDING THIS PROJECT.

SINCERELY YOURS,

James E. Simmons

JAMES E. SIMMONS
5036 THATCHER DRIVE
MARTINEZ, CA 94553

LETTER #A-49
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,


Virginia Spencer
2235 Natalie Ave
Las Vegas NV 89109
(702) 735-9217

LETTER A-49

LETTER #A-50
COMMENTS

850 E. Desert Inn #712
Las Vegas, NV 89109
September 17, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

Re: Southwest Intertie Project.

With regard to the Southwest Interie Project Draft Environmental Impact Statement/Draft Plan Amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely;


Bruce Steurer

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

LETTER #A-51
COMMENTS

850 E. Desert Inn #712
Las Vegas, NV 89109
September 17, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

Re: Southwest Intertie Project.

With regard to the Southwest Interie Project Draft Environmental Impact Statement/Draft Plan Amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely;



Jane Steurer

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

LETTER #A-52
COMMENTS

TO: MR. KARL SIMONSON
FROM: MARIS VALKASS
SUBJECT: POWER LINES ACROSS NEVADA
DATE: 9-16-92

GENTLEMEN:

IT IS MY UNDERSTANDING THAT THERE IS
A PROPOSAL TO BUILD A NEW POWER
LINE(S) FROM IDAHO TO LAS VEGAS, NV.

THE LINES WOULD BE BUILT IN AN UNspoiled
AREA.

IT SHOULD BE BLM'S POLICY TO RESTRICT
OPENING OF NEW AREAS FOR ANY DEVELOPMENT
IF IT IS AT ALL POSSIBLE TO USE
EXISTING DEVELOPED AREAS OR RIGHTS OF
WAY. ROUTES SHOULD BE CONSIDERED
AFTER A COMPLETE ENVIRONMENTAL IMPACT
HAS BEEN STUDIED, AND CONSIDERATION
MUST PRIMARILY GIVEN TO ENVIRONMENTAL

RESPONSES

- A The SWIP DEIS/DPA and this document address your concerns. Additional information on the Purpose and Need of the SWIP is on page 3-1 in Chapter 3 of this document. Your comments are noted and will be considered in the BLM's decision process.

LETTER A-52

LETTER #A-52
COMMENTS

RESPONSES

AND SCENIC CONCERNS AS OPPOSED TO
ECONOMICS OR MONEY MAKING POSSIBILITIES.

AS I UNDERSTAND IT, THERE IS NO NEED FOR
THIS NEW POWER LINE. ALL REQUIREMENTS
CAN BE MET BY EXISTING FACILITIES.
PLEASE, DO NOT APPROVE IT. *M. Valeri*

MARIS VALKASS
1728 VAN HORNE LN. REDWOOD BEACH, CA
90278

LETTER #A-53
COMMENTS

RESPONSES

A Your comments are noted and will be considered in the BLM's decision process.

September 3, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Clara Watson
4202 Hallendale
L.V.N.V 89117

LETTER A-53

LETTER #A-54
COMMENTS

NORMAN WELER
RT 1 BOX 100A
BISHOP, CALIF. 93514

*Grace W. Enfield
262 Academy #4
Bishop, CA 93514*

Sept. 9, 1992

Karl Simonson
BLM
Burley District Office
Route 3 Box 1
Burley, Idaho

Dear Mr. Simonson:

Was alerted to the Southwest Intertie Project and the EIS put out for it by your Office.

Comment time for it is short so will use the following printed statements. They are similar to those my Sister and I used for a proposed intertie corridor here in Owens Valley, handled by the Bishop Office of the BLM. As Avocational Archaeologists we deplore the opening up of large Archaeologically sensitive areas to Vandalism due to easy access from right-of-way maintenance roads.

☛ Support the "NO ACTION" Alternative. No powerline should be routed down our fast disappearing natural valleys unless things are really desperate. No justification is presented in this report which shows a compelling need for the line. In fact it is a redundant line to compete with another Utah to Las Vegas powerline. Neither will run anywhere near capacity.

☛ Support the use of existing already built-upon right-of-ways rather than any designation of new right-of-ways. The impact on a new area is FAR greater than expanding an already built-upon right-of-way. When more capacity is really needed let it be added to the existing routes in Utah. The study dismissed the Utah alternative prematurely based in part upon the assumption that the now discontinued Thousand Springs plant would be built.

☛ Mention the immense visual impact to now-open valleys. The existing criteria for judging the visual impact of powerlines is skewed against preservation of NON-BUILT upon areas. Under the formula an unspoiled valley where few people go is considered less important than the valley which already has a main truck route through it. The BLM should be defending the open public lands against new encroachments, not assisting in their destruction.

☛ Mention significant desert tortoise impact especially in the Pahranaagat Wash area where power lines and highways compete for space with wildlife and wilderness study areas. Powerlines are favorite places for ravens to perch while seeking young tortoises as prey.

RESPONSES

A There would be significant visual impacts to the scenic natural landscapes of public lands. Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although undisturbed natural landscapes of open desert valleys possess inherent scenic value, the scenic quality of these areas is considered "minimal" to "common" based on the definitions of scenic quality used in the VRM System. Scenic quality classes are determined in context with the regional landscape character. Open desert valley landscapes are characteristic and common to the project study area. The BLM will consider public concerns for scenic quality in their decision process. The BLM uses the VRM System to manage the visual resources of public lands. For a detailed explanation of the VRM System and the visual impact assessment model refer to the methods section under Visual Resources in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

B There would be impacts to desert tortoise, although mitigation measures taken during construction should be very effective in reducing or eliminating these adverse effects. The question of transmission line impacts on hatchling tortoises is a subject of ongoing study. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure, and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. It is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

LETTER A-54

LETTER #A-54
COMMENTS

- C [☒ Mention significant hawk and raptor impacts. This powerline runs the same north-south route taken by one of the largest hawk migrations in North America. The Goshute Range is a concentration point for the birds as they travel south from Canada and the northwest in the Fall. Every year numbers of hawks and eagles are killed by high voltage power.
- D [☒ Mention impacts on Great Basin National Park. The favored route runs a powerline over Sacramento Pass just north of glaciated Wheeler Peak in the Snake Range.
- E [☒ Mention the impact on an estimated 200 to 400 archaeological and historical resource sites in the direct path of the powerlines. An estimated 50 to 125 of these are expected to have "significant value", however NO consistent inventory has been made.

Please adopt the NO ACTION Alternative and put a stop to this destruction of Public Lands.

Very truly yours,

Norman Weller

Grace Weller Enfield

RESPONSES

- C Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission line proposed for the SWIP would utilize V-guyed steel lattice, self-supporting steel lattice, and tubular steel H-frame towers. The spacing between conductors on towers is sufficient to prevent phase-to-phase or phase-to-ground contact. Conductors are hung on towers in such a manner that they are 23 to 32 feet apart. Further, conductors are hung on insulating systems that will be 14 to 20 feet in length depending on tower design (refer to the SWIP DEIS/DPA pages 2-12 through 2-14). Because of the distance between conductors and the tower, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the tower.

The BLM acknowledges that numbers of raptors are killed each year in the United States as a result of electrocution. Most such incidents occur, however, on lower voltage distribution lines.

Refer to Avian Collision Hazard on page 3-89 of this document.

- D The proposed 230kV Corridor Route is approximately 2 miles north of Great Basin National Park and 4-5 miles north of Wheeler Peak. To further minimize visual impacts to travel routes leading into the park, several mitigation reroutes through Sacramento Pass have been evaluated (refer to Sacramento Pass Mitigation Reroute on page 3-39 of this document).

No significant visual impacts to viewpoints in Great Basin National Park would occur because of the distance of the alternative routes from these viewpoints. Non-specular conductors and steel H-frame towers across the highway would minimize other adverse visual effects of the SWIP.

- E If one of the routes is approved by the BLM, there will be a cultural survey completed for any potentially disturbed areas, (e.g., rights-of-way, access routes, assembly yards) prior to any ground disturbing activities. Refer to mitigation measure #9 in Table 1-6 of this document. All Cultural resource impacts will be mitigated.

LETTER #A-55
COMMENTS

RESPONSES

Sept 16, 1992

A Refer to the Sacramento Pass Mitigation Reroute section on page 3-39 of this document for a comparison of the alternative that crosses your fields versus one that avoids your fields on the north side. The alternative route on the north side of your fields has been selected as the Agency Preferred Alternative (refer to page 1-9 of this document).

KARL Simonson
BLM Burley Dist Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson,

I am a resident of Snake Valley Utah-Idaho area and also a farmer there. I have just heard about a 500 KV power line to be built through this valley alongside 2 already existing 230 KV lines and I am in direct protest of this. I AM probably the most

LETTER #A-55
COMMENTS

RESPONSES

A
affected property owner in this area
as there are at least 8 pole sites
Right though my fields already
and not any wires from a responsible
party that another is planned.

Of all the rooms in this large
reality in populated area I
would even like to know why
by changing a fraction of degree
the direction of existing one-person
property could ^{not} have been
completely missed in the ~~past~~
I have to work only under these
lines and it is not just the
fact that I can't receive any radio
waves under them but health ~~loss~~

LETTER #A-55
COMMENTS

RESPONSES

hazards may also be indicated. Also
Aerial crop dusting for me is
nearly impossible etc. etc.
I understand there is an
alternative route meaning it is
total unnecessary to cross this area.

Please use the alternative Route.
I don't know if this will
reach you in time. I think some
sort of notification to people directly
impacted by big business decisions
in time to respond would be desirable.

Sincerely,
DARWIN C. WHEELER
P.O. Box 70 GARRISON, UT. 84773
Darwin C. Wheeler

LETTER #A-56
COMMENTS

Howard James Whitaker

7 September 1992

Mr. Karl Simonson
Burley District Office
Bureau of Land Management
Route 3, Box 1
Burley, ID 83318

Dear Mr. Simonson,

RE: Southwest Intertie Project EIS

I am opposed to the use of additional public land not now used as transmission corridor being used for subject project, particularly when the proposed right-of-way transits so close to Great Basin National Park and through so many other ecologically sensitive areas. To support my opposition, I would call your attention to the following:

- A [1. The EIS fails to support the economic need for the powerline and therefore there is no justification for routing it through now-open Nevada valleys;
2. When the economic justification for new powerlines can be made, then construction of such should only be allowed within existing power-transmission corridors. Adversely impacting now-open valleys is indefensible, yet the EIS gives little weight to such;
- B [3. Adverse desert tortoise impact can be expected, as powerlines are used by ravens as perches while seeking young tortises as prey. Furthermore, powerlines bring roads, roads bring ORV's and smashed tortises are the result (I've seen plenty of it);

RESPONSES

A Refer to the expanded Purpose and Need section in Chapter 3 of this document. It is not possible to route the SWIP parallel to existing utilities for its entire length. The BLM has selected the alternative routes based on planning methodology to minimize impacts, and has subsequently studied the potential impacts of each route to select an alternative that minimizes impacts to the degree possible.

Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although undisturbed natural landscapes of open desert valleys possess inherent scenic value, the scenic quality of these areas is considered "minimal" to "common" based on the definitions of scenic quality used in the VRM System. Scenic quality classes are determined in context with the regional landscape character. Open desert valley landscapes are characteristic and common to the project study area. The BLM will consider public concerns for scenic quality in its decision process. The BLM uses the VRM System to manage the visual resources of public lands. For a detailed explanation of the VRM System and the visual impact assessment model refer to the methods section under Visual Resources in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

B There would potentially be impacts to desert tortoise. However, the committed mitigation for desert tortoise will help to reduce adverse impacts.

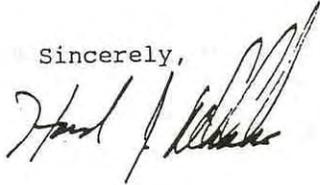
LETTER A-56

LETTER #A-56
COMMENTS

C [4. Adverse raptor impact is inadequately addressed. The proposed route and area are both significant for migration and concentration.

I keep hoping and hoping that BLM will one day give wildlife, wilderness and preservation at least equal status with consumptive use of our public lands, but am continually disappointed. Is this going to be a repeat?

Sincerely,

A handwritten signature in black ink, appearing to read "Hans J. [unclear]".

RESPONSES

C The entire SWIP route is not an area of known raptor concentration or migration. However, there are portions of the route where raptor populations are known to be of significance. The BLM has identified habitat and nesting areas of species such as ferruginous hawk, golden eagle, bald eagle, and peregrine falcon as areas of concern. The presence of these species has influenced the route selection process over the entire suite of alternative routes and links considered.

The introduction of the SWIP transmission line into the habitat of these species is not likely to significantly affect the continued existence of any of them. On the contrary, concern has been expressed for other species (e.g., sage grouse) because construction of the line would provide more nesting and hunting sites for some raptor species (e.g., golden eagle) with a resulting adverse impact on sage grouse.

LETTER #A-57
COMMENTS

Connie Wilcox
1612 Justin Pl.
Hend. Nu- 89015
(702) 566-6738

RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.

September 5, 1992

Karl Simonson
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

re: Southwest Intertie Project

With regard to the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan amendment, I would like to state that I am in favor of using a route away from Arrow Canyon. Arrow Canyon should be fully preserved for not only future generations but our generation as well.

Sincerely,

Connie Wilcox

LETTER A-57

LETTER #A-58
COMMENTS

RESPONSES

DR. TERENCE PRESTON YORKS
45 East 500 North
Logan, Utah 84321
801-753-4647

DISTRICT OFFICE
BURLEY
AUG 5 10 04 AM '92

29 July 1992

Karl Simonson
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Simonson:

The following comments apply to the Southwest Intertie Project (SWIP) Draft Environmental Impact Statement (DEIS), a copy of which you were kind enough recently to forward to me. My background for this response includes formal training in physics and systems engineering (at the master's and doctoral levels), as well as considerable professional experience in energy modeling and in other environmental quality areas.

While contemplating how to respond to this document, I encountered words from Mihaly Csikszentmihalyi which seemed particularly apropos, "The task is to learn how to enjoy everyday life without diminishing other people's chance to enjoy theirs". Unfortunately, philosophy at this level does not play much of a part in the current EIS process, despite how much better the public could be served thereby. The massive SWIP document set instead focuses on minutiae. With the exceptions noted below, it appears to deal with the finest details with authority.

LETTER A-58

LETTER #A-58
COMMENTS

However, the DEIS in its present form contains truly pivotal material that is grossly oversimplified in several very critical areas. The document is fatally flawed as a result. You will need, accordingly, to revise your time schedule for a final decision because of these sins of omission in the current publication. The situation regarding the SWIP is not merely a question (as it now presented) of *where* to build a transmission line, or of *how*, but also of *whether* this transmission project is justified at all.

Nevertheless, as one aware of EIS projects' normal progress, let me begin with the technical issues that need more specific attention. Where the numbers to back up the contention (pages 2-7 and 8) that DC (instead of AC) transmission is "too expensive"? In asking this, I am haunted by a mailing that I received some years ago from an electric utility (in this region) which asked me to join with them, as a CO-OP user, in opposing "too expensive" pollution controls. That set of controls, if installed at that time, would have spared the atmosphere thousands of tons of sulfur dioxide annually. When I got past very similar rhetoric to that found in the present DEIS and to the actual calculations used at that time to define "too expensive", that actual cost amounted to less than one one-hundredth of a cent per kilowatt hour. Hence, especially given the high transmission losses involved in long-distance transport of electrical energy (as is the case with the proposed SWIP), reviewers need to see the hard numbers used to define the term "too expensive". Next, those calculations need to be explicitly compared within the EIS to the cost savings that would come from the greater efficiency inherent in DC transport of power. This comparison, to be fair, needs to be made at the marginal cost of producing the power that would be lost in the AC option -- including new, unsubsidized generation costs, and the associated pollution impacts -- over the full lifetime of the project.

Related to that issue, why is the absolute magnitude of transmission losses never given within the DEIS? Over the distances described, and at the intensity specified, they are sure to be quite significant. Power lost

RESPONSES

A A DC transmission alternative for transmitting 1200 MW of power from the Midpoint Substation to the Dry Lake Area would cost about \$488 million (\$200M for line and \$144M for each line DC substation terminal) compared to \$356 million for the proposed AC transmission line. As pointed out in the SWIP DEIS/DPA, the ability to tap is considerably more difficult with a DC transmission alternative. The cost of each tap is an order of magnitude greater (\$100+ million vs. \$10 million) and is not included in the \$488 million estimate for the basic transmission line.

The actual efficiency of a comparable DC alternative would depend upon the design of that system, (i.e., voltage rating and conductor selection). For example, the Pacific DC Intertie transmission line has been uprated twice in its history, once to increase its voltage rating and the other to increase its capacity rating. The line was originally designed to operate at 1600 MW at +/- 400kV. A 1200 MW flow at +/- 400kV would have generated 8.6 percent loss. In the 1980s, the Pacific DC Intertie was uprated to +/- 500kV and is now capable of transferring 3100 MW. For a 1200 MW flow on the current DC system, the losses would be about 5.7 percent compared to 6 percent for the SWIP.

DC and AC transmission lines cause similar environmental impacts. Although DC transmission line towers have two conductors as opposed to three for AC transmission lines, the towers for a DC transmission line would be similar in size because of increased clearance requirements for DC. Further, DC substations are larger and also require neutral ground mats that are quite large.

The losses incurred on the SWIP would depend upon the loading at any given time. For a 1200 MW transfer, the losses would be about 6 percent. Below the 1200 MW level the percent losses would be reduced. For example, at 600 MW the losses would be about 3 percent.

LETTER #A-58
COMMENTS

B during transmission is also sure to require considerable additional generation capacity to replace, with all the ancillary environmental and economic costs that that entails. Transmission losses are not a factor that should be wholly ignored, as they now are.

C Further related to such losses is the specification on page 2-13 of aluminum as the conductor of choice. The use of copper could nearly halve transmission losses (and many of the problems associated with corona discharge that were discussed within the DEIS in some detail). Let's see, accordingly, a full cost/benefit comparison of a copper conductor alternative. That also needs a thorough inclusion of all related costs of transmission losses over the life of the project.

D Following the discussion of copper versus aluminum, the issue of an underground placement will need to be revisited, since lower losses mean less heat generation, thus possibly negating the central objection to the underground option.

E Shifting to the issues of soils and vegetation, on page 4-89 the similarity of SWIP and the Kern River Gas Pipeline is mentioned. Why are the notable failures in revegetation, and the exacerbated soils disturbances, beyond those anticipated in that specifically-called similar project's EIS not explicitly mentioned, instead of merely hinted at? Many of these failures are currently involved in serious litigation, since the damage was so obviously done. Why are additional restraints on construction techniques not accordingly added to this DEIS, and then underlined? The current throw-away line that desert soils are difficult to revegetate is hardly sufficient!

F Under visual impacts, on page 4-39 and in Tables 4-1 and 4-2, "dulled metal" is suggested to mitigate disturbance (where bothered with at all) by the proposed powerline to the visual environment. In the closely-related case of what are actually less visually disruptive gas and petroleum wells, terrain-appropriate painting is now required, since it is well-proven to

RESPONSES

C The equivalent electrical copper conductor size to the proposed 1590 kcmil aluminum conductor is 1000 kcmil. The weight of this size of copper conductor is 3.1 lb/ft. versus 1.8 lb/ft. for the aluminum conductor. The cost of aluminum conductor is quoted as \$.80/lb and for copper conductors is \$1.52/lb. Therefore, the copper conductor sells for \$4.71 per foot versus \$1.44 per foot for aluminum. Additionally, the copper conductor has a low strength to weight ratio which would necessitate additional and higher structures than would be required using the aluminum conductor. The project estimated conductor cost using aluminum is about \$37.4 million versus \$122.2 million for copper.

D The SWIP DEIS/DPA does not mention the most limiting technical restraint to transmitting AC power via underground cables. Voltage control along the cable can limit the distance AC power may be transmitted. The voltage control requirements of a 500kV underground cable are 20 times greater than a typical overhead line. For the SWIP project, this would require facilities spaced evenly (every 5 to 10 miles). The cost of the reactive facilities alone would exceed \$220 million (15,000 Mvar). Also, copper is a component of most high voltage underground transmission cables which would further increase costs.

E If the SWIP is approved by the BLM, a specific revegetation and restoration plan will be developed as part of the Construction, Operation, and Maintenance (COM) Plan (refer to page 1-34 of this document). The reference on page 4-89 of the SWIP DEIS/DPA does not draw a similarity to the disturbances of the SWIP and the Kern River Gas Transmission Pipeline. It states instead that the Las Vegas Valley Water Development Project may cause similar disturbance to the Kern River Gas Transmission Pipeline. The discussion under Cumulative Effects in the SWIP DEIS/DPA refers to potential reasonably foreseeable future actions within southern Nevada. The ground disturbance caused by the SWIP would be much less significant than a pipeline project of this magnitude (also refer to Table 2-1 of the SWIP DEIS/DPA).

"Terrain-appropriate painting" is not considered an appropriate mitigation for the treatment of transmission line towers in the landscapes that would be affected by the SWIP. First, painting towers would be very expensive and maintenance would be very labor-intensive. There are numerous examples of this type of tower painting in the West in a wide variety of landscapes. There

LETTER #A-58
COMMENTS

RESPONSES

F [dramatically reduce visual-line contrast. Why is a similar option of terrain-appropriate painting of transmission towers not discussed, and then, why is it not required as mitigation? It would seem feasible to satisfy the separate needs of the FAA and the on-ground-viewer by angle-specific tinting.

G [Further, given the ubiquity of additional development activity over time, why is the "out-of-(current)-sight, out-of-mind" mentality preserved in this DEIS, and why are not all, rather than just some, towers required to be minimally intrusive in their visual design?

H [Relatedly, and introduced on page 4-37, the various photo-simulations of visual impact do not take into consideration the contrast actually perceived by area users who wear contrast-enhancing glasses. This is not a trivial point, since in this bright desert, near-desert, and/or higher altitude environment, the use of dark glasses, including polarizing and similar filters (e.g., haze-cutters such as Corning's trade-marked 'Serengeti Drivers'), will be in fact more common than not. Therefore, in the photo-simulations, the towers need to be darkened by a factor of at least two, and their boundaries sharpened. The towers are virtually certain to be more noticeable visually than they have been represented in the figures presented (even if one cynically adds in the air-quality degradation that will result from the additional electrical energy use and generation that would be occasioned by this project, through its losses, and if the lower prices it promises come about).

I [This brings us to the more general issues which have been avoided in the DEIS. Primary among these is the downward spiral in environmental quality that consistently has been brought on by lowering either economic or local environmental apparent energy costs to end-point users. In studies which seem to have been conveniently overlooked within this DEIS (as it now stands), immediately lower out-of-pocket cost are well proven to encourage additional electricity use, and to decrease attention to conservation or to real productivity. As population and other demands

are few cases that demonstrate that this technique would be more successful in mitigating visual impacts than dulled towers, especially considering the substantial cost and the potential for additional environmental impacts associated with frequent access to towers and spillage of paint, thinners, and other chemicals.

G The visual assessment does not use an "out-of-(current)-sight, out-of-mind mentality". First, we have considered future land uses wherever possible. Second, the visual model assesses impacts to the scenic quality of landscapes irrespective of how it is seen. For more information refer to Volume III - Human Environment Technical Report for the full methodology and results of the visual assessment (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

H It is unlikely that the majority of viewers would be wearing "Serengeti Drivers". The photo-simulations were prepared to depict typical viewing conditions without correcting for weather, atmospheric conditions, or other circumstances that might alter the perception of the landscapes viewed.

I The requirements for least cost resource acquisition by the utilities which become partners in the SWIP would insure that the SWIP would not be developed as an alternative to conservation. Rather, the SWIP would be evaluated by potential partners in the project as part of a strategy for meeting load growth at lowest cost using conservation programs and the sharing of existing regional resources. At some time in the future when new regional generating resources are needed, transmission systems, such as the SWIP, would make more resource options available, and should help minimize costs and environmental impacts.

Long-term costs, not immediate out-of-pocket costs, are used by utilities and regulatory agencies to measure the costs of alternative resource options. Participation in the SWIP would be evaluated on this basis by the utilities considering partnership in the project. Also refer to response J below.

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I grow, this strategy eventually and inevitably increases, rather than decreases, the kinds of problems that are listed as primary justification for the SWIP.

J This consideration, which is not covered within the DEIS, is especially important because long distance transmission of electricity is even explicitly noted to allow the related degradation that results from of local action to be transferred elsewhere. Similar past projects have already permitted Los Angeles and Las Vegas to ship pollution that they themselves could not allow to Arizona (e.g. the Page plant that is now being painfully at least partially housebroken), to New Mexico (at the Four Corners plant, whose airborne effluent was literally visible from the moon), and to Utah (the carefully hidden from the public Intermountain facility that is to be tied into SWIP). The second-to-the-last comment on page 2-11 in the DEIS seems the very essence of the underlying operating philosophy, which could be more simply expressed by an Anglo-Saxon containing analogy: my backyard, as a result of my activities, is getting stinky; therefore it's now time to start pissing over my neighbor's fence so that I can do even more of what created the waste in the first place, without bothering to consider its consequences. Accordingly, the opening quote of this letter needs explicit inclusion and discussion within the cumulative impacts section of the SWIP-EIS, since it is precisely SWIP's long-distance transmission ties that allow such placing of ones' electricity-use effluent in someone else's backyard.

K Somewhat less sarcastically, perhaps, but no less importantly, on page 2-2 and following, how can a complete document discuss the costs and potential of conservation without even mentioning the name of Amory Lovins, or quoting his group's, and so many others (including Southern California Edison's), much more encouraging figures? This omission is clear proof that considerably more work needs to be done before a fully-informed decision on SWIP's justification can be made.

RESPONSES

J Conservation and demand-side management are integral parts of the resource strategy of every utility considering partnership in the SWIP. Federal and state regulatory requirements dictate that supply-side and demand-side resource options be considered on an equal basis in a utility's plan to acquire lowest cost resources. Conservation and other demand-side management programs are expected to reduce, but not to eliminate, the region's need for new generating resources.

Transmission facilities can contribute in several important ways to the task of the region's utilities to meet future load growth in the most efficient manner possible and with the smallest amount of new generating capacity. First, it is important to recognize the seasonal diversity of loads within the region. Transmission would allow existing resources to be used to serve seasonal load requirements in one part of the region while also meeting new load growth requirements in another part of the region. Therefore, total regional resource requirements (e.g., generation) can be reduced by using transmission. Then, when new regional generating resources are needed, transmission, such as the SWIP, would make more resource options available, and should help minimize costs and environmental impacts.

The SWIP participants are expected to include only utilities which have found through their least cost planning that the transmission capacity provided by the SWIP would be a cost effective strategy to acquire the new resources needed to serve load growth.

Also refer to expanded discussion of Purpose and Need in Chapter 3 of this document.

K Refer to Response J above.

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As a sub-point here, on page 2-5 in the DEIS, how was the stated conclusion reached that conservation has only a local impact? As an unsupported opinion, as it now stands, it seems both specious and inadequate, especially when the basic decision of whether or not to build is so directly related to it, and so much literature exists to suggest quite the opposite conclusion. Another issue also should be included as a portion of these discussions. A primary form of increased productivity is increased efficiency, and the very definition of increased efficiency is the use of less energy. America's economic competitors, particularly in Europe and Japan, have learned this lesson well; why is this factor ignored here?

L Hence, why are the real costs and more complete benefits of conservation not more directly compared to those of the proposed project? (It is curious in this regard that even immediate economic cost of the SWIP is never mentioned.) This a special key to the overall point. Many of the utilities that are indicated to be partners in SWIP have explicit legal requirements to realize conservation alternatives as their first choice for action, not just, as stated in the DEIS, when they are the immediate lowest cost option. Why is this requirement not mentioned in the DEIS? What happens when these companies start to take their legal mandate more seriously? What happens if the rest start to take into more consideration the needs of the rest of planet, or if the rest of the planet starts to make them aware of that need? In direct counterpoint to the statement made on page 4-90, there is more solid evidence available that all conservation directly, absolutely, and repeatably reduces global warming. These are just two among many reasons for a more thorough re-evaluation of this alternative.

M Finally, why (on page 1-5) are utility projections of future demand presented as if they are gospel truth (to two significant figures, no less, and without indicating a margin of error!)? Should not the not-so-distant past failures of these same sources' real-world accuracy, and the massive financial results of those failures in prediction validity (e.g., the \$5 billion lost with WPSS), be mentioned alongside the estimates now presented?

RESPONSES

L Refer to Response I above.

M Current utility forecasts of resource requirements recognize the fact that the future is uncertain and take steps to reduce the risks resulting from that uncertainty. For the same reasons that investors diversify investment portfolios to minimize the risks associated with individual stocks, utilities seek to diversify their system resources to minimize the risks associated with individual resource options. To reduce the risks associated with load growth uncertainty, utility planning favors resource options which can be developed in the shortest possible length of time. Reducing the "lead time" of resource options allows the actual commitment to construct a resource to be made at a point when forecasting uncertainty has been reduced as much as possible. By increasing the number of resource options available to a utility, the SWIP would serve as a tool for reducing the risk of over-building or under-building generating resources as a result of load and resource uncertainties.

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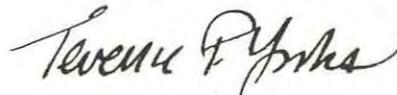
M Relatedly, on page 1-7, is not California, especially Southern California, now experiencing a decline in population growth rates, which may soon turn into a net out-migration, rather than continued growth as indicated?
Certainly, neighboring, and more distant, areas are reporting an influx of California businesses and their employees. Why is this possibility not mentioned, along with the very real possibility that neither electric demand nor immediate area population demand will occur as claimed, and why are not these points discussed in more detail?

N It seems amazing, in conclusion, that the recent dismissal of the closely-related proposal for the Thousand Springs Project in Utah is mentioned just in passing in the SWIP DEIS, and quite inappropriately without examining the very valid reasons why that project was set aside. The SWIP project seems, by reflecting upon what it now leaves unsaid, to deserve a similar oblivion.

To achieve its rightful place, however, whatever that fate may be, the SWIP EIS needs a more complete document regarding its key environmental and economic relationships, rather than just concentrating on deep coverage of its ancillary details (no matter how important these may be). As it now stands, the SWIP DEIS reminds me of a dog that is designing a very carefully constructed and comfortable bed, but without noticing that he was doing so in the middle of a passing lane of a major highway.

N The SWIP is in no way tied to the Thousand Springs Power Project. However, NEPA requires that "foreseeable" future projects be addressed under cumulative effects. The Thousand Springs Power Project was a current proposal during the SWIP EIS process. It appears now that it has been withdrawn from further consideration.

Yours sincerely,



Terence P. Yorks, Ph.D.

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COMMENTS

Mason Valley at sunrise, looking south at the Laguna Mountains. Teddy bear cholla, agave and ocotillo, which dominate the foreground here, are found in abundance in this valley. Anza-Borrego Desert State Park.

Photo: Paul R. Johnson

RE: Southwest Interstate Project



It is important to use existing right-of-ways for power lines. The visual impact on open valleys of new power lines would be horrendous + would not be protecting resources for future generations. An undisturbed valley is an important legacy and is emotionally satisfying to many people. Isn't the BLM supposed to manage public resources? Keep the visual impact minimized by protecting open valleys.

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RESPONSES

- A Your comments are noted and will be considered in the BLM's decision process.