

**COMMENT LETTERS AND
RESPONSES FROM ORGANIZATIONS**

LETTER #B-2
COMMENTS

RESPONSES



September 10, 1992

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Baker, NV

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Carson City, NV

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FIELDING M. McGEHEE III
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JOE SANCHEZ
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J.R. WILKINSON
Administrative Assistant

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

Dear Mr. Simonson:

Greetings. Citizen Alert is a 2600-member statewide citizens organization founded in 1975. Our mission is to address significant environmental, nuclear and military issues from the perspective of how these impact the land, economy and people of the Great Basin. Following are our comments on the Southwest Intertie Project (SWIP) Draft Environmental Impact Statement (DEIS):

- As no need for the crossie has been demonstrated, and the project will result in environmental degradation around Great Basin National Park, we urge the "no action" alternative.

- The environmentally preferred Cutoff Route, and NOT the Crosstie Route must be the preferred route should the project go ahead at all. To cite the FLPMA policy of consolidating corridors "where possible" as the reason for supporting the Cutoff Route is ludicrous and disingenuous in the extreme. The present 230 kV lines are invisible compared to the odious specter of massive steel towers and 500kV lines. What a wonderful first impression to give visitors to Great Basin National Park! BLM admits it is concerned about the visual effects of the Cutoff Route on page 2-48. Transfer this concern into action, and mandate the environmentally preferred route.

A The visual impacts of the 230kV Corridor Route, including those to Great Basin National Park viewpoints, are accurately described on page 4-45 of the SWIP DEIS/DPA. Refer to Table 2-5 for a summary of the environmental comparison and pages 2-57 and 2-58 for the reasons that the 230kV Corridor Route is the Agency Preferred route. Also refer to page 3-12 in this document for a description of cumulative effects. Your preference for the Cutoff Route is noted and will be considered in the BLM's decision process.

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B [• The DEIS suggests potential human health risks exist from exposure to high voltage transmission lines. Unlike the Crosstie Route, the Cutoff Route avoids homes and farms, greatly reducing continual human exposure to electromagnetic radiation. As any expert in this field (who is not on the payroll of an electrical utility) will tell you, the Cutoff Route is clearly more acceptable from a public health perspective.

• The DEIS states the Corridor Route and the Cutoff Route have similar environmental impacts. This would be credible only if you did not consider visual pollution and continual human exposure to electromagnetic radiation, both of which are guaranteed by the Corridor Route and greatly minimized by the Cutoff Route.

Finally, if the Los Angeles Department of Water and Power and BLM were genuinely committed to minimizing environmental and human health impacts, there would be no question about which route to pursue. Thank you for considering our views.

Sincerely,



Bob Fulkerson
Executive Director

RESPONSES

B Please refer to Cumulative Effects on page 3-12 of this document for additional information regarding environmental comparisons of the Ely to Delta segment routing alternatives. Also refer to Electric and Magnetic Fields on page 3-72 of the SWIP DEIS/DPA and Recent EMF Research Results on page 3-19 of this document.

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September 17, 1992

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Karl Simonson
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BOARD OF
DIRECTORS

Re: ADDITIONAL COMMENTS on SWIP DEIS

ELIZABETH G. ANNESS
Reno, NV

Dear Mr Simonson,

PEG BEAN
Las Vegas, NV

LOUIS BENEZET
Pioche, NV

Citizen Alert has submitted comments on the Draft Environmental Impact Statement (DEIS) for the Southwest Intertie Project (SWIP). The following additional comments are submitted by Citizen Alert's Southern Nevada Office in Las Vegas.

GAYLE CHUDD
Reno, NV

JO ANNE GARRETT
Baker, NV

FRED LANDAU
Las Vegas, NV

PURPOSE AND NEED: SWIP is a proposal by Idaho Power Company (IPC) 500 mile 500 kV powerline from Shoshone, Idaho to Dry Lake Valley near Las Vegas. The stated purpose is to allow for north-south power transfers.

VICENTA MONTOYA
Las Vegas, NV

SUSAN ORR
Sacramento, CA

ODESSA RAMIREZ
Carson City, NV

BILL POSSE
Austin, NV

The DEIS does not present adequate information to show a need for SWIP. A transmission line to a desert valley in southern Nevada does not satisfy the stated need for power transfers with the Southwest. Obviously, SWIP would be a component of a complex regional system, but this DEIS does not give enough information on this system to indicate the feasibility of either the regional system or the SWIP component.

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There is not enough information to support a choice of Dry Lake Valley as a terminus, nor is there sufficient indication of why substations need to be located at Thousand Springs, Ely, and possibly Delamar. One is left to infer that SWIP is dependant on plans to locate coal burning generators at these sites and that SWIP will encourage rather than defer new power projects.

A Additional information is presented under Purpose and Need in Chapter 3 on page 3-1 of this document. The SWIP DEIS/DPA was not intended to evaluate the regional transmission system.

B Potential interconnections have been identified in the Wells and Ely areas which could provide significant load or interconnection service to the local utilities. The SWIP would require series compensation sites located along the line for voltage support. Due to the nature of series compensation stations, these sites would also be a good location for any interconnections that may be desired by other utilities. The SWIP would not be dependent upon any specific power plant integration. Refer to page 1-3 in Chapter 1 and the Marketplace-Allen Transmission Project under Cumulative Effects on page 3-14 of this document.

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C The analyses of power demand in the Northwest and in the Southwest are not adequate to show need for SWIP. In fact it appears from the DEIS that the higher rate of load growth in the Southwest in winter makes SWIP less feasible. The "balanced demand peaks" in the IPC service area indicate a similar conclusion.. The coastal regions with the highest demand already have existing transfer systems as well as the new Third AC Intertie project.

"Reliability," which essentially means a proliferation of widely spaced powerlines redundantly connecting the same points is not sufficient justification for SWIP which represents a secondary, seasonal power source: the high environmental costs outweigh the meager benefit, "Enhancement of the electrical grid" is not sufficient justification for defacement of the Great Basin.

D The DEIS mentions few benefits to rural Nevadans from SWIP. Employment opportunities are limited and of short duration. If SWIP is intended to increase the availability of low cost power to rural areas in the state, this is not mentioned.

E This DEIS also applies to a proposed 200 mile "Crosstie" from Ely, Nevada to Delta Utah. An examination of the relationship of these two different projects is essential under cumulative impacts. However, the purpose and need for the two projects do not coincide, and the crosstie project should not be submitted for decision in this document. The argument that "Los Angeles Department of Water and Power, will probably reapply" for this transmission line is inadequate to justify including the Crosstie in this DEIS, especially since the overwhelming public response to the scoping hearing in Delta, Utah was "no more transmission lines."

Citizen Alert urges the NO-ACTION ALTERNATIVE because of lack of sufficient need for SWIP.

F PROJECT ALTERNATIVES; While the EIS considers alternative routes it does not consider real alternatives to the project such as alternate energy sources, including energy efficiency. While the mention of some of the existing energy efficiency programs in the Northwest and Desert Southwest is a plus, there is inadequate discussion about expanding these programs. The omission of Nevada is significant. The rapidly growing power demand of Nevada's urban centers is cited as justification for SWIP; the untapped opportunity for energy and water conservation in Nevada is not mentioned.

The Deis argues that SWIP's purpose is regional while conservation programs are local. Therefore the latter are not worthy of further consideration. This argument is absurd. It assumes that the final

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C The IPCo may have more of a balanced winter/summer peak demand, but the remainder of the Northwest does not. Please refer to page 1-10 of the SWIP DEIS/DPA for a discussion of 3000 MW of seasonal diversity and Chapter 3 of this document for the expanded Purpose and Need.

System reliability would be a major benefit or result of the integration of the SWIP into the WSCC system. System reliability is not a major part of the purpose and need for the SWIP.

D The SWIP is not intended to supply low cost power to rural Nevada.

E Refer to the Purpose and Need in Chapter 3 of this document for additional explanation of the relationship between the SWIP Midpoint to Dry Lake segment and the Ely to Delta segment.

F The statement that conservation affects energy use and system reliability on a local rather than a regional basis is meant simply to indicate that the conservation programs of individual utilities, like their generating resources, have a localized impact. Of course, conservation throughout the western region certainly will have an impact on overall future generating resource requirements in the region.

By reducing new regional generating requirements, however, conservation does not correspondingly reduce the value of regional transmission for minimizing resource costs. Even with reduced generating requirements, environmental and economic considerations may require siting new generation at substantial distances from population and load centers, thus requiring new transmission such as the SWIP. Also, because of the seasonal diversity which exists between Northwest and Southwest loads and resources, purchases and exchanges of power over the SWIP would be expected to help the entire region meet load growth by utilizing existing resources more efficiently. Finally, regional conservation potential may be developed more fully given the availability of adequate regional transmission to move it.

Without such transmission, the cost effectiveness of conservation programs must be determined on the basis of the avoidable generating resource costs of an individual utility. Utilities having a lower avoided cost will be able to develop conservation resources to a lesser degree than utilities with a higher avoided cost. Transmission can enable the development of conservation

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F objective is to build a major project, forgetting that the true purpose is to serve costumers efficiently at the least monetary and environmental cost.

G ROUTE ALTERNATIVES: The DEIS considers seven alternative routes for SWIP. While northern route alternatives are based on extensive study, alternatives routes from Ely south have not been developed. The main considerations in the selection of the one proposed route appear to have been avoidance of Air Force training routes and consolidation of routes with other power lines, in particular the White Pine Power (WPPP) and Utah Nevada Transmission (UNTP) projects. Insufficient attention has been paid to avoidance of visual impacts near Hwy 93 and from other important view points in the area.

H The west slopes of the Highland and Bristol ranges are visited frequently by local residents and tourists. These are historical mining districts of great interest. The sites also provide locally famous vistas of unspoiled valleys and distant ranges. The intrusion of SWIP on this scene would be a significant defacement.

I Nevada's highways offer a unique experience to the traveler; our clear open spaces are visually and spiritually rewarding. Hwy 93, named by act of Congress the Great Basin Highway, offers some particularly fine views that will be permanently defaced by SWIP, WPPP and UNTP: in particular, the west escarpment of the Arrow Canyon Range with its strikingly banded limestones and the view of Comet Peak in the Highland Range (a national landmark) from Delamar Flat. The DEIS dismissal of Hwy 93 as a "moderate sensitivity viewpoint" is inadequate, as is the omission of other important viewpoints. .

Of the four alternative routes for the crosstie, Citizen Alert strongly urges the cutoff route as opposed to the "preferred alternative" through Sacramento Pass. The latter route would degrade the vistas of Mount Wheeler and the Snake Range from outside the Park and spoil views of the valleys from the Parks mountainsides. This defeats the Parks intended purpose of preserving a classic example of the Basin and Range Province of the western U.S.

J DESIGN: Because of Air Force concerns SWIP will employ towers less than 100 feet high in some areas. If IPC will consider lowering the towers sufficiently so that airplanes can fly over them, why not lower ALL the SWIP towers to mitigate visual impacts?

K SWIP requirement for 2,000 ft separation from other transmission lines appears excessive. The reliability argument is inadequate and not supported by data in the DEIS. There is no indication how wide a separation would satisfy the WSCC criteria and the 2,000

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throughout the region at a level determined by the highest avoidable generating costs in the region.

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

G Refer to pages 2-31 through 2-32 of the SWIP DEIS/DPA for a discussion of the expansion of the project south of Ely to the Dry Lake area. The BLM believes that sufficient attention has been paid to visual impacts on the Ely to Dry Lake segment of the SWIP. All impact studies for all the alternative study corridors were completed to the same level of detail.

H Few historic mining sites have been formally recorded along Links 673, 674, and 675, but the historic mining town of Bristol Wells, dating from 1880, has been listed on the National Register of Historic Places (refer to Volume IV - Cultural Environment Technical Report, page 9-69). Link 674, which would have the most impact on this resource, was dropped from all alternative routes. The chosen alternative, Link 673, is more than three miles away and residual visual impacts are projected to be low (refer to Appendix H for the locations where the technical reports can be reviewed).

I The visual sensitivity rating for U.S. State Highway 93 is accurate. This highway has no formal designation as a scenic highway or byway, but it meets the use volume and user type criteria to be considered a moderate sensitivity viewpoint. No other important viewpoints were pointed out during the inventory or subsequent reviews of the documents.

J In fact, lowering towers would not decrease visual impacts, but would likely increase the significance of visual impacts because more towers would be required to maintain adequate clearance between the ground and conductors (per National Electric Safety Code standards). The average span of about 1/4 mile allows the best balance between height, number of towers, and economic costs.

K The 2,000-foot separation requested applies specifically to separating the SWIP and the UNTP. Each right-of-way evaluation or request within the WSCC system should consider the specific line combinations to determine whether a specific separation is required. The issue is the credibility of a

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K [apparently influenced Bureau of Land Management planning for utility corridors up to three miles wide in some districts. This represents an over commitment of public land for this use, and invites the proliferation rather than the reduction and consolidation of projects. Separation will likely increase the visual impacts and extend the area of environmental impacts related to surface disturbance. Cumulative impacts will multiply from over development of the SWIP route due to the over-wide corridor.

CUMULATIVE IMPACTS; This DEIS must go a lot further to present the impacts of SWIP in the context and in relation to the impacts of all other major utility projects existing or proposed in the region impacted. The DEIS should include information on regional planning to reduce the cumulative impacts of these projects. The analysis of likely cumulative impacts needs to be considerably expanded, for example,

L [1) If Coal burning generator plants are likely to be built at any of the substation points what would be the effects on air quality and visibility. Air emissions from the existing Moapa plant result in reduced visibility north of Caliente, as can be observed from the BLM fire lookout station at Ella Mt. What would be the effect of a plant at Dry Lake Valley on air quality in Moapa. Is the Delamar substation a possible generation site? If so what likely impacts would result?

M [2) Would the viability of SWIP likely depend on new power generating facilities being developed in Nevada? To what extent would the existence of SWIP as proposed increase the likelihood of that other projects with major environmental effects would be approved? These would include power generating plants, additional transmission lines, and water pipeline projects such as the Las Vegas Valley Water District's rural water importation plan.

Citizen Alert urges the No-Action Alternative for SWIP because of the extensive environmental impacts which would probably result from cumulative effects of this and other projects which the DEIS fails to adequately address.

Sincerely,



Louis Benezet

Southern Nevada Office

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simultaneous loss of the circuits involved. The WSCC Criteria says:

"..., the credibility of loss of a particular set of lines will depend upon the total distance of common corridor shared by the lines and upon the vulnerability of the circuits over that distance to a common mode failure. Considerations for this vulnerability assessment will include line design; length; location, whether forested, agricultural, mountainous, etc.; outage history; operational guides; and separation. For example, some utilities use separation by more than the span length as adequate to designate the circuits as being in separate corridors."

This issue is not new. For example, the Third Pacific 500kV AC Intertie requested and received miles of separation between it and two existing 500kV interties in forested areas. This separation was required to allow adequate response time to adjust the system following the loss of the existing lines and a potential loss of the third 500kV line. Similar to the SWIP and the UNTP, the consequences of such an outage would be wide spread outages in the WSCC system. Without this separation, that project would probably not be feasible.

L There is no information to indicate that generation plants may be constructed at substation locations. A series compensation station is planned in the Delamar area (refer to Chapter 2 of the SWIP DEIS/DPA).

M The SWIP would not be dependent on the success or failure of any generation facilities proposed now or in the future (refer to Chapter 1 of the SWIP DEIS/DPA and the expanded Purpose and Need in Chapter 3 of this document). It is unknown what effect the SWIP would have on the likelihood of other projects being permitted. Chapter 1, Purpose and Need, in the SWIP DEIS/DPA states that the construction of the SWIP may defer the need for new generation. The Cumulative Effects section of Chapter 4 in the SWIP DEIS/DPA discusses reasonably foreseeable future actions, but they would not be dependent on the success or failure of the SWIP.

LETTER #B-4
COMMENTS



COMMITTEE FOR IDAHO'S
HIGH DESERT
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RESPONSES

- A The purpose and need has been expanded in this document (refer to Chapter 3).

September 17, 1992

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

RE: SIP DEIS

Dear Mr. Simonson:

The Committee for Idaho's High Desert (CIHD) is Idaho's largest desert conservation organization and was incorporated in 1981. Our members use the deserts of Idaho, Nevada, and Utah for educational, scientific, literary, social, recreational, artistic, and religious purposes.

CIHD, in this letter, is also providing comments for Idaho members of the Nevada Outdoor Recreation Association, Inc. (NORA). CIHD submits the following comments on the Southwest Intertie Project Draft Environmental Impact Statement:

A. INADEQUACIES UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT:

- A [1. The Purpose and Need Statement is inadequate and presupposes the Preferred Alternative, in violation of the National Environmental Policy Act.

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- B [2. **The range of alternatives is inadequate (consisting of one choice!) and presupposes the Preferred Alternative, in violation of the National Environmental Policy Act.**
- C [3. **The No Action Alternative is not adequately analyzed, in violation of the National Environmental Policy Act, and the EIS presuppose the Preferred Alternative. For example, the consequences of conservation are not adequately analyzed.**
- D [4. **Specific mitigation plans for effects on raptors, wildlife, and other resources are inadequate, in violation of National Environmental Policy Act regulations, and monitoring plans for foreseen and unforeseen effects on such resources as raptors are not present in the EIS.**
- E [5. **Cumulative impact studies for raptors, visual resources, and other resources are inadequate for National Environmental Policy Act compliance.**

B. **SPECIFIC CONCERNS AND INADEQUACIES:**

- F [1. **The maps in the EIS fail to adequately describe the land gradient from north to south along the project. Contours of the proposed rights-of-way for the project appear to follow water grade from the Snake River in Idaho to Las Vegas (and the nearby Colorado River), with existing or proposed substation located suspiciously near the several lift points.**
The maps should reveal the gradient for all alternatives.
- G [2. **The EIS should more clearly describe the business relationship between Idaho Power Company and Los Angeles Department of Water and Power for this project.**
- H [3. **The EIS should specifically list all undesignated, and reserved rights-of-way which are associated with this project.**
- I [4. **Any Congressional requirements regarding granting of rights-of-way for the project on Public Lands, military lands, or private lands should be explained in the EIS.**

RESPONSES

- B The range of alternatives studied in the SWIP DEIS/DPA is adequate and meets NEPA requirements. Alternatives must be considered but can be eliminated from further consideration if they are not found to be "reasonable and feasible" in meeting the project's stated purpose and need, with the exception of the No-Action Alternative. Please refer to Chapter 2 of the SWIP DEIS/DPA for a discussion of the range of alternatives considered.
- C The No-Action Alternative is adequately analyzed. Energy conservation and load management are addressed on page 2-2 of the SWIP DEIS/DPA and further discussed on page 3-16 of this document.
- D The mitigation planning for this project has been adequate to assess alternatives and arrive at an environmentally preferred route. It would not be practical to prepare either specific mitigation plans or monitoring plans, for all the alternative routes. The number of iterations of mitigation and monitoring plans that would have to be prepared to incorporate all of the possible link combinations examined for the EIS would be enormous.
- A Construction, Operation and Maintenance (COM) Plan for the project will be developed following a Record of Decision. The COM Plan will address such issues as biological and cultural resources clearances, specific mitigation planning, and monitoring (refer to page 1-34 of this document).
- E The studies conducted for the SWIP DEIS/DPA are adequate for NEPA compliance.
- F The gradient of the various routing alternatives is irrelevant. The alternative routes were in no way laid out to set up a water project as you suggest. Refer to page 2-9 under Routing Alternatives in the SWIP DEIS/DPA and the SWIP Regional Study (D&M, 1989).
- G The relationship between the IPCo and the LADWP is described on page 2-17 of the DEIS/DPA and further explained in Chapter 1 of this document.
- H Figure 1-1 in this document shows the designated utility corridors as well as the planning corridors. These utility corridors are described in the resource management plans (RMPs) or management framework plans (MFPs) of the

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RESPONSES

- J 5. The EIS should explain the relationship of the proposed corridors to the raptors migration routes. The corridors appear to follow the principle raptor migration route for North America and cumulative impacts and mitigation for raptor electrocution, etc. must be specifically addressed.

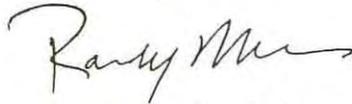
C. OTHER CONCERNS:

CIHD specifically objects to, and will oppose, any intrusion, including visual intrusions, into any Wilderness Study Area.

Please notify CIHD of all actions regarding this matter.

Thank you for attention to our concerns.

Sincerely,



Randy Morris, Chairman

affected BLM districts and resource areas. There are no records of any undesignated or reserved rights-of-way in the project area.

The BLM does have numerous small rights-of-way for access roads, ditches, pipelines, buried fiber optic lines, and other uses throughout the SWIP corridors. The BLM will contact all holders of existing rights-of-way to notify them of the selected route and solicit their concerns.

I There are no Congressional authorizations needed to grant a right-of-way across public lands for the SWIP. The BLM and other federal land management agencies have the authority to grant rights-of-way on public lands. Rights-of-way across private lands would be negotiated between the project proponent and the private land owner.

J A specific raptor migration route has not been identified. It is well known that large numbers of migratory raptors are present in the Goshute Mountains during both spring and fall.

Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The SWIP 500kV transmission line would use 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 supporting towers in such a manner that they are 23 to 32 feet apart (Olendorff, 1986, p. 13). 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 in the SWIP DEIS/DPA). Because of the distance between conductors and supporting 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 of a 500kV transmission line.

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

LETTER #B-5
COMMENTS

**CONNECTING POINT
FOR
PUBLIC LANDS**

POB 705 - Picabo
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208 788-2837

9/17/92

TO: Mr. Karl Simonson, project manager
SWIP DEIS
FROM: Janet OCrowley

Dear Sir: I do not see the NEED for another power transmission line through Nevada heading toward Las Vegas.

A If Intermountain Power Project could not find sufficient incentive in the demand market to complete its AC power line south through Delta and beyond -- and if Idaho Power plans, or if UNTP plans, or if a consortium plans a cross-tie line from Delta - N. Ely, what conceivable reason could Idaho power have for building yet another line?

A That may be a rhetorical question if it is true that Idaho Power has other objectives concealed within this proposal. What the nature of those other objectives need not be the concern of BLM, but BLM should take more seriously the need of the applicant to show NEED for the project - the stated project.

What I see here rather than need is opportunity. opportunity to reap a huge profit in the future water and power market. The cost will be born by owners of the public lands in loss of amenities. I am very familiar with the Lincoln County-Clark County terrain, have lived there, having explored its byways and revelled in its open and unimpaired naturalness (except along highway right-of-ways). I cannot agree that any private company should be allowed to disfigure and clutter, to irretrievably and irreversibly disfigure our public lands in this manner when no need other than a corporation's desire to expand and to increase profits at the public expense.

RESPONSES

A The IPCo has requested the right-of-way to construct the SWIP because of the reasons stated in the Purpose and Need statement in the SWIP DEIS/DPA and in the expanded discussion under Purpose and Need in Chapter 3 of this document. Also refer to the discussion of the Utah-Nevada Transmission Project which is fully described on page 2-37 of the SWIP DEIS/DPA.

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B I should like also to comment on the DEIS itself as a document. Succinctly, my impression is of a great deal of data gathering and engineering study which will no doubt be utilized in construction design. That is a plus for the applicant. What I do not see in the discussion of Impacts is any concern for what those impacts mean to the public. They are simply stated and that is that. They do not enter into the decision of "whether or not to proceed" as the National Environmental Protection Act specifies. For example: p 4-11 pp2 *There is no way to mitigate predation of sage grouse...these impacts would remain high even after mitigation and would be long term and significant.* pp3 *These impacts (to curlews) would be adverse and long-term.* pp 4 *These impacts (to sage grouse) would be significant, adverse, and long-term.* And on and on and on all through the wildlife section.

C We are referred to Table 2 for specific mitigation measures only to find no intention to repair, or offset these horrendous, permanent damages to our wildlife populations. There are instead 12 design features listed such as non-shiney insulators and dulled-finish metal towers. There is a total absence of on-site or off-site mitigation which might include purchase of other roadless lands to be managed for sage grouse, or dedication of sandhill crane or curlew grassland.

Apparently what Idaho Power considers its sole responsibility in the way of making up to the public for what it wants to destroy **significantly, adversely and long-term** is a one-time expenditure of its structures and their emplacement (as by helicopters).

My reaction as a long-suffering, significantly, adversely affected public citizen is this plan cannot be approved. No way, until Idaho Power offers **significant, benign, long-term** measures to offset the impacts to the land and the wildlife.

D May I ask in all seriousness What does Idaho Power offer the public in return for the assets we are expected to give up? Perhaps a perpetual royalty percentage of the profits to be invested in a land-water-wildlife trust to be administered by a public citizen selected trust corporation? Or are we to expect a reduction of power rates so long as the adverse impacts continue? I expect this question to be answered in the Final Impact Statement.

RESPONSES

B The intent of NEPA documents is disclosure of facts, without bias. The decision of whether or not to proceed must be based on many criteria, including environmental impacts (disclosed in the SWIP DEIS/DPA), project costs, and public input. The alternatives development, inventory, and impact assessment have been an environmental process. Some engineering input is necessary to determine routing feasibility and to understand what activities could result in impacts.

C There are a number of generic mitigation measures listed in Table 4-1 of the DEIS/DPA that would be applied throughout the project to minimize impacts. Specific mitigation, rehabilitation, and monitoring plans will be developed with the BLM during preparation of the Construction, Operation, and Maintenance Plan (also refer to page 1-34 of this document).

D The IPCo's mandate is to provide reliable, low-cost energy in the most efficient manner possible. Also, as explained in the Purpose and Need in the SWIP DEIS/DPA, the SWIP would reduce the need for the construction of new generation resources. It would also push out the need for rate increases to customers. The regional economic benefits of the SWIP are described on page 3-8 of this document. In addition, some of the direct benefits include annual right-of-way rental fees paid to the public land-administering agency and the tax benefits to the various counties that would be crossed (refer to the socioeconomic sections in Chapters 3 and 4 of the SWIP DEIS/DPA). Also, please refer to the expanded discussion of the purpose and need in this document, specifically the section on least-cost planning.

LETTER #B-5
COMMENTS

E May I ask what is the Bureau of Land Management doing here to fulfill its duty of land manager? In what way is it fulfilling the FLPMA behest that "public lands remain under the stewardship of the Federal Government, unless disposal is in the national interest, and that their resources be managed under a multiple-use that will best meet future needs of the american people." Quote from BLM *Wildlife on the Public Lands*.

I am enclosing an analysis I made of the corridor selection and a cover letter I have sent with it to prominent persons in Idaho. Will you please make it part of the record of public comment?

Janet Crowley

RESPONSES

E The BLM public lands policy is based on the principles of multiple use and sustained yield. Use of the public lands for rights-of-way is one of the multiple uses just as is the use of the public lands for recreation, wildlife habitat, livestock grazing, timber production, mineral production, and the protection of cultural and historical resources. All of these uses are considered by BLM managers in making a decision on any given land use proposal.

Use of public land for right-of-way purposes is not a disposal of the land. A right-of-way is an authorization to rent public land for a definite period of time and is subject to an annual rental payment, specific stipulations for the construction, operation, and maintenance of the facility, and is subject to regular compliance checks to assure compliance to the terms and conditions of the Right-of-Way Grant. Public land within a right-of-way, in most cases, is open to public use like any of the other public lands. The BLM can require joint occupancy of a right-of-way by other compatible facilities. BLM managers are managing the public lands for multiple uses and are taking into account the long-term needs of future generations for renewable and nonrenewable resources in their decisions.

LETTER #B-5
COMMENTS

**CONNECTING POINT
FOR
PUBLIC LANDS**

POB 705 - PICABO, ID 83348
(208) 788-2837

RESPONSES

F The gradient of the various routing alternatives is irrelevant. The alternative routes were in no way laid out to set up a water project as you suggest. Refer to page 2-9 under Routing Alternatives in the SWIP DEIS/DPA and the SWIP Regional Study (D&M, 1989).

9/15/92

ANALYSIS OF IDAHO POWER'S SOUTHWEST INTERTIE PROPOSED ROUTING
Perhaps this SWIP acronym should more properly be spelled "SWIPE".
The informed opinion of a reliable observer has long held that the powerline routing here shown conceals within itself the lowest gradient course for conducting water from vicinity of Hagerman, Idaho to Las Vegas, NV.

Many seemingly unrelated details known to me strengthen this suspicion. Nothing in this analysis of route chosen by Dames and Moore for Idaho Power goes contrary to the hypothesis.

F Using only U.S. Geodetic Survey maps: Twin Falls, Wells, Ely, Lund I retraced the thrice-favored route shown in the Draft Environmental Statement of June 1992 "Southwest Intertie Project DEIS DPA" (available from Dames and Moore, POB 1601, Boise, ID 83701.) I transposed the route shown as "Environmentally, Utility and Agency Preferred route" shown in green, blue and red onto GS maps in the library. To the degree of accuracy possible to ascertain from the DEIS' obscured background, and considering the apparently much smoothed DEIS lines, I laid out the route on Geodetic Survey maps with 200' contours to discover that there are only three upgradient portions on the preferred route. One of these roughly coincident with a major generating station "Salmon Falls"; one is at the end of a major intertie line (from IPP's Delta substation in Utah); while the third route point where a major lift would be required is at Wilkins, NV, where a major generating plant was planned. This Thousand Springs plant was only scrubbed in 1989 when a consortium fell apart due to internal

LETTER #B-5
COMMENTS

RESPONSES

disagreement and the apparent involvement of crime family money. Major opposition on environmental grounds to the Thousand Springs plant was voiced in Utah, and Idaho, which caused Congressional delegates to publicly oppose the project.

Note: The Midpoint to Salmon Falls segment of the proposed power line is shown in the DEIS as an alternative eliminated, however this corridor is already heavily powerlined and could be added later if and as a water-transport corridor is requested. The lift required to raise water from the Snake River at Salmon Falls is the smallest at any point after the River leaves Milner Dam. The gradient UP the Salmon Falls Creek is relatively gentle, and could be powered from the Salmon Falls generating plant.

F

Note 2 The electrical energy necessary to lift water through the gap in the Egan Range north of Ely could well be supplied by 345 KV from the Intermountain Power Project at Delta, Utah, which the DEIS explains is not integral to Idaho Power's intertie Project, but is left in the DEIS as a favor to the IPP, and will be signed over to them after approval of the SWIP.

Note 3 Substations are conveniently situated to the necessary lift points: Thousand Springs, Goshute, North Steptoe, Robinson Summit. The three major lifts required appear to be 1) up the Salmon Falls Creek bed, 2) at Cobre 3) at Steptoe over Robinson Summit on Highway U.S. 6.

LETTER #B-5
 COMMENTS

RESPONSES

Points on the Utility Preferred Route with elevations in feet:

Hagerman Rim	3000	Townsend Well	7000
Salmon Falls Res.	5100	Jake's Wash	6300
Jackpot	5200	White River Vly	6000
Follow RR route to Wilkins		Preston	5400
Siding	6000	Adams, McGill Lake (could	
Up Toano Draw	6000	stay higher)	5100
Cobre	5800	Pahroc	5400
RR route to Goshute		Dry Lake Vly	4800
	5600	Delamar Vly	4000
F Currie	5700	Maynard Lake	3200
Warm Springs	5800	Down all the way to	
Steptoe	6200	Dry Lake Subst.	
Cross Egan Range	7600		

Major lifts are: Hagerman Rim, Up Salmon Falls Crk to Jackpot, Up Toano Draw, and at Steptoe over the Egan Range. Proper engineering could doubtless follow contours to maintain elevation in many places, or the use of "siphons" would move water over descents without the need for power. It must be noted that the route highlighted in this DEIS for "powerline" follows many deviations from direct line, and all of these deviations appear to coincide with finding the lowest gradient route.

LETTER #B-5
COMMENTS

RESPONSES

**CONNECTING POINT
FOR
PUBLIC LANDS**

POB 705 - Picabo
Idaho - 83348
208 788-2837

9/17/92

Dear _____

*Letter to prom-
inent persons
in Idaho*

F Herewith is a short selection from my file on schemes to move massive quantities of water around in north America.

I believe you will be interested in the possibility that Idaho Power may be prepositioning itself to obtain an optimum gradient corridor for water transfer in the guise, or at the same time it becomes permitted for a power transmission corridor from the Snake River to the Las Vegas vicinity.

I do not have access to the sources that could add more details to this shadowy outline. We are all aware of Southern California's insatiable thirst, of its history in acquiring water from whatever source by any means. We also know of Clark County, Nevada's ongoing initiative to preempt all the water sources in its nearby defenseless sister counties.

LETTER B-5

LETTER #B-5
COMMENTS

RESPONSES

F | All I can claim is that the elements are here that allow Idaho Power to participate in this grandiose scheme. I present it for your information, in the hope that you will scrutinize these documents in the light of information you may have already. If the logic appears clear to you, that you would take steps to publicize and to thwart these designs on Idaho's water.

If not you, then who?

James Crowley

LETTER #B-5
COMMENTS

RESPONSES

**CONNECTING POINT
FOR
PUBLIC LANDS**

POB 705 - Picabo
Idaho - 83348
208 788-2837

*Next-day acknowledgment
to letter*

9/18/92

Please bear with me. After mailing a letter to you yesterday concerning Idaho Power's Southwest Intertie Project that points out an arguable connection with the Los Angeles Water and Power Department's schemes to pipe Northwest water to the Southwest, then I discovered in the Draft Environmental Impact study this following paragraph. The evidence would not be comprehensive without it.

F

Here it is: *page 4-89 "Future Projects"*

- Las Vegas Valley Water Development Project - a proposed water development project is being planned by Clark County to increase the municipal and industrial water supply of the Las Vegas area. The pipeline planned to transport the water from north of Clark County will utilize utility corridors used by the SWIP or prepare a plan amendment. The pipeline could be in the range of 36 inches in diameter

Soils - Expected ground disturbance would be similar to the recently constructed ~~Yam River Gas~~ Transmission Pipeline. The disturbed area would be about 100

Please consider this carefully

Cordially

LETTER B-5

LETTER #B-6
COMMENTS

RESPONSES



**DESERT
SURVIVORS**

**DESERT SURVIVORS
P.O. Box 20991
Oakland CA, 94620-0991**

September 17, 1992

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

Comments on the Draft EIS for the
SOUTHWEST INTERTIE PROJECT

Dear Sir:

Thank you for this opportunity to address our concerns with this proposal. **Desert Survivors** is a cooperative non-profit desert conservation group. We have been working to protect arid lands in California and Nevada for many years. We sponsor numerous trips yearly introducing hundreds of people to desert areas in the Great Basin, Mojave, and other desert habitats. Our interests are most closely allied with preservation of the habitats of remote areas, wildernesses, wilderness study areas, and other roadless tracts. In recent years we have come to realize that these now identified islands of wildemess cannot be expected to sustain themselves for long without a regional approach to their management.

LETTER B-6

LETTER #B-6
COMMENTS

SUPPORT FOR THE NO ACTION ALTERNATIVE

A [The EIS has identified fairly clearly the enormous impact upon the local environment that this proposed project would have. We feel that the EIS has not gone far enough in uncovering the whole impact.

B [Here you have presented us with a project which has taken a regional approach to solving what seems to be largely a inter-state power-marketing problem but which ignores regional issues when assessing the impacts upon the environment. For example, much time has been spent looking at local powerline impacts but little at regional issues such as:

What is the effect on the huge raptor migration annually using the proposed project's north-south pathway for international flights?

C [How many structure-free open space valleys will be left in this inter-state region if this project is completed?

D [How do powerlines impede inter-region migration of animal life needed to preserve biological diversity?

E [How much uncluttered open space should be available for urban people throughout the country to get a rightful sense of what remains of the "wide open spaces?"

We recognize that the answers to these questions are difficult to quantify but it is becoming clear that we as the public and you as the care-takers of our public lands must begin to grapple seriously with these issues. As the answers are not clear yet, only an over-whelming need for short term benefits should budge you from a staunch protective attitude toward these precious remaining open space lands.

Has an over-whelming need for short-term benefits been presented? Clearly not, the utilities are stumbling over themselves with vague partial justifications for this powerline. The main benefit will be the presence of a redundant powerline giving them competitive power marketing advantage.

RESPONSES

A The intent of NEPA documents is disclosure of facts without bias. The SWIP DEIS/DPA, Map Volume, Technical Reports, and Data Tables disclose the predicted impacts of the SWIP in great detail.

B A specific raptor migration route has not been identified. It is well known that large numbers of migratory raptors are present in the Goshute Mountains during both spring and fall.

Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The SWIP 500kV transmission line would use 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 supporting towers in such a manner that they are 23 to 32 feet apart (Olendorff, 1986, p. 13). 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 in the SWIP DEIS/DPA). Because of the distance between conductors and supporting 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 of a 500kV transmission line.

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

The BLM does not have this information.

D The BLM is not aware of any scientific literature that suggests electrical transmission lines impede inter-regional migration of animal life. In a study of desert bighorn sheep in western Arizona, this was one of the focal questions. The study lasted for more than seven years and involved as many as 39 radio-collared bighorn. The study involved a 500kV transmission line and was divided into pre-construction, construction, and post-construction phases. The only significant difference between the pre-construction phase and the other phases of the study was that some radio-collared sheep spent more time within the transmission line corridor during construction than they did before or after construction. There was no statistical evidence to suggest that the presence of the energized transmission line kept sheep from moving within and among the mountain ranges of the study area.

LETTER #B-6
COMMENTS

We therefore advocate the **NO ACTION ALTERNATIVE**.

Please **STOP** this project as it is currently proposed.

We feel it would significantly erode existing natural values across the entire eastern portion of the State of Nevada and only return questionable short-term benefits. Your role as administrator and protector of the Public Lands in the United States should allow you to see clearly that projects of this massive scale can no longer be routinely justified in our rapidly vanishing western open space lands. We are disappointed that your participation in this proposal seems to take only the most narrow viewpoint.

PROJECT JUSTIFICATION UNFOCUSED

- F Is this a project for inter-regional power transfer?
- Is this a project for market place power brokering?
- Is this a redundant powerline in case something happens to existing lines?
- Is this a project to connect power sources which might or might not be built?
- Is this a project to have in place in case energy conservation becomes unfashionable?
- Is this a project which got started for different reasons not now valid but no one wants to kill?

To one extent or another all of these reasons are present or implied in the EIS. It seems clear that the construction of this powerline will create a large excess of power-carrying capacity which may be used only in emergencies for the foreseeable future.

The main short-term purpose seems to be to pit this new unused capacity against current powerline owners so that the sponsoring utility companies can obtain favorable powerline usage rates. This may be a benefit to some but cannot be seriously weighed against the immense impact this project will make upon currently unbuilt upon open spaces across eastern Nevada and Utah.

RESPONSES

E The BLM agrees that it is important to retain uncluttered open space wherever possible. This is one of the primary reasons why the Agency Preferred Alternative would use the 230kV Corridor Route.

F The SWIP is proposed to facilitate inter-regional power transfer. Many sections of the SWIP DEIS/DPA describe the purpose of the SWIP as providing additional transmission capacity between the northwest and the southwest transmission systems (i.e., inter-regional power transfers).

The capacity of the SWIP would provide the ability to better utilize power resources that are available and push into the future the need for the construction of new generation resources. Open access to the power market means that many entities will be able to compete for energy supplies which will create market forces that tend to hold down price increases. This creates a situation that will make it difficult to "broker" power since all entities will have their own access to the market. Refer to page 1-11 of the SWIP DEIS/DPA and page 3-8 of this document.

No, the SWIP is not redundant to any other project. However, the SWIP will provide support to other power lines, like all other AC power lines in the WSCC region.

The SWIP's primary function would be to provide inter-regional power transfers. To the extent capacity is available and reliability is maintained, future interconnections with the SWIP will be allowed.

No, the SWIP would not replace conservation. 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 should 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 will 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 seasonal load diversity within the region.

LETTER B-6

LETTER #B-6
COMMENTS

RESPONSES

REDUNDANT CAPACITY FOR ARTIFICIAL COMPETITIVE REASONS

A major impetus for this powerline project is the concept of a Marketplace and power brokering. This is a totally artificial reason for spending huge sums of money and making huge impacts on formerly unspoiled Western Public Lands. The powerline gets put in not because we need added capacity but to force parallel powerline owners to reduce transmission rates or provide access. This is what happened to railroads in the Robber Baron Era of the late 19th century. Boom and bust rate wars and monopoly pricing freeze-outs kept western farmers in turmoil for decades until some measure of government regulation somewhat leveled the table in the public interest. Unfortunately similar situations of monopoly capitalism are still going on today. The tragic thing here is that its being done on PUBLIC LAND right-of-way.

The hodge-podge of conflicting state and federal regulations and low cost public right-of-way is allowing these large utility companies to monopolize their grants to existing powerline right-of-ways. This forces competing utility companies to demand more parallel redundant public rights of way to get their power product to market.

A perfect example of this is proposed for California commercial gas customers in the Bay Area. The utility company PG&E provides gas to residential and commercial users and is regulated by the California State Public Utilities Commission. A utility company with rights to an interstate gas line right-of-way (a few miles into the Arizona border) wants to construct a new gas line to the Bay Area from Southern California. There is no need for extra capacity for gas transmission to the Bay Area. They only want to sell to current PG&E commercial customers at a lower rate than PG&E. If the project is approved, the impact of an added gas pipe line on the land will occur with no public good other than raising residential rates and lowering commercial rates.

This abuse of public lands for artificial competitive purposes must be stopped. Especially where the values of untouched lands are so high and the remaining stock of untouched land is rapidly shrinking. Say NO to this type of project!

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 (i.e., 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.

No, the purpose and need of this project has not changed. Refer to the expanded discussion of purpose and need in Chapter 3 of this document.

LETTER #B-6

FLAWED PROCESS - WRONGLY ELIMINATED ALTERNATIVES

G We are greatly concerned that attention is being focussed upon the wrong area for this powerline. The original study contained alternatives which included the present-day rights of way which allow power to be moved from Las Vegas to Idaho via Salt Lake. The project eliminated them from consideration in 1989, three years ago, with the comment that it had to go through the ELY area and that land use conflicts were difficult in the Salt Lake area. (p 2-10). No further explanation of this is made in the EIS. What is the compelling reason for going through ELY? There is now no Thousand Springs Power plant. If the approved White Pine plant is built near Ely two already approved powerline right-of-ways exist for that. For the stated purpose of inter-regional power transfer upgrading the Salt Lake corridor would be an adequate alternative. Expansion of an existing built-upon right-of-way is preferable to the initial can't-turn-back damage of the first construction in an unbuilt open space. No information is provided in the EIS about the extent of "land-use conflicts" in Salt Lake. H

In any project when basic purposes and assumptions change in the review process, any previously eliminated alternatives should be put back on the table for re-review under current requirements. The refusal to reconsider this alternative is a major flaw in this EIS.

NEED FOR BASIN CONSERVATION/PRESERVATION

Basin Conservation, the need to identify and conserve the BASIN habitat in the Great Basin area of the West. Numerous studies have identified roadless areas, wilderness areas and wilderness study areas. Most are now undergoing some phase of evaluation for preservation or management. However when you look at these areas collectively, almost all involve mountainous terrain, almost all have had the flat or basin portions carved away or not recommended. Very few Basins in the Basin and Range province have been studied or identified.

H We are only now beginning to realize difficulties of long term habitat management when only isolated islands of habitat are kept. Regional ecosystems need all

RESPONSES

G There is the distinct possibility of a 230kV interconnection in the Ely area as well as possible interconnection with the future White Pine Power Project (WPPP). There are no existing rights-of-way for the future WPPP although there was a favorable Record of Decision in 1985 to grant these rights-of-way. If the WPPP is constructed, the SWIP would likely interconnect with it.

The Salt Lake City alternative was eliminated from further consideration, not only because of the land use conflicts, but also because it would not meet the purpose and need. In 1989, it was determined that the UNTP would not have available capacity for the SWIP at which point the project description was revised (refer to page 2-25 of the SWIP DEIS/DPA). The SWIP Regional Study (D&M, 1989) documents the potential impacts of the regional routing alternatives including the Salt Lake City alternative.

The SWIP would result in very little long-term destruction of habitat. Overland construction has been recommended in sensitive habitat areas to minimize the area of disturbance and eliminate the long-term disturbance associated with new access roads. There is no evidence that the SWIP would result in habitat fragmentation or impair the movement of any wildlife species.

LETTER B-6

LETTER #B-6
COMMENTS

RESPONSES

H elements managed and considered in long term habitat plans. Range islands without basins cannot long endure. Nevada is lucky to have a number of basins which are in fairly good shape or can be recovered with good management. A project like the SOUTHWEST INTERTIE, if approved, will cut away at the number of basins available. No regional inventory of these basins has been made, much less taken into consideration for this project. Since the benefits of the project are generally of regional impact, the regional impact of the vanishing basin habitats should be considered.

INTERNATIONAL RAPTOR MIGRATION IMPACT SLIGHTED

I The Goshute Mountains are a concentration point for one of the few major annual hawk migrations in North America. Thousands of hawks of numerous species from large areas of the Northwest and Canada funnel down through the Goshute corridor on their way South for the winter. The world famous raptor monitoring station on Goshute Mountain logs and bands hundreds of hawks per day in peak migration periods. These hawks are under pressure at both ends of their annual flights as habitat shrinks in Canada, the U.S., and Mexico. The migratory bird act does not allow for the purposeful destruction of any of these birds by new projects. The entire 500 mile Southwest Intertie follows the highly used raptor corridor. The EIS mentions that powerlines do kill some birds. There is no quantitative estimates of annual dead hawks per mile of powerline. A recent EIS in California estimated perhaps 20 raptor deaths per year for a 50 mile powerline not in a major hawk corridor. If we double the number of deaths per fifty miles due to the higher density of birds and multiply by 10 to allow for 500 miles of new powerline we get an estimate of 400 dead raptors per year.

400 Dead Hawks per year is a large toll. No information is presented about the regional impact of an annual raptor kill of this magnitude.

I The BLM is aware of the migratory hawk banding station in the Goshute Mountains, and of the impressive numbers of hawks that have been captured and banded there by Hawkwatch International and its cooperators. The BLM is not, however, aware of documentation of a clearly defined migratory corridor that is coincident in location with the preferred SWIP corridor.

The BLM has not attempted to estimate the number of raptors that might be killed each year as a result of collisions with the SWIP transmission line. To generate such an estimate in the absence of any real data on the numbers of hawks, resident and migratory, that occur in the vicinity of the transmission line on an annual basis would be highly speculative. Additionally, the BLM would need to know the average altitude at which all species migrate through the area. The Goshute banding station, for example, is several thousand feet higher in elevation than the SWIP (i.e., 9,500 feet versus about 5,500 feet). The BLM sees no reasonable possibility of the project affecting birds at that elevation.

It is interesting that an EIS in California estimated 20 cases of raptor mortality per year for a 50-mile transmission line. Olendorff and Lehman (1986, "Raptor Collisions with Utility Lines: An Analysis Using Subjective Field Observations", Pacific Gas and Electric Co., San Ramon, CA.) issued a worldwide call for information on raptor mortality from collisions with utility lines. They received a total of 121 responses to their request for information. Of this number, only 88 could be analyzed due to inadequacy of information. Their conclusion: "Collision with utility lines apparently is a random, low level, and inconsequential mortality factor in raptor populations." It is the BLM's opinion that your estimate of 400 dead raptors per year is a very significant over-statement of real probabilities.

Also refer to the discussion of Avian Collision Hazard on page 3-89 of this document.

LETTER #B-6
COMMENTS

RESPONSES

NEED FOR OPEN SPACE

People need open space. We can't all live in open space areas. Most of us have to live in crowded cities. Most of us however can get away for various lengths of time to be in less crowded lands. One of the major aspects of the Wilderness Act is the opportunity for solitude that wilderness areas afford people who enter these areas. What is that solitude? Part of it is a separation from other people. Part of it is a separation from other people's impact on the natural environment. Part of it is a feeling of attachment to a natural environment. How does this differ in a wilderness area (Range) and in an open space valley (Basin). In an open Nevada valley even when in a car driving on a dirt road, the feeling of expansiveness and freedom is quite tangible. You can see from ridgeline to ridgeline across wide valleys; now little impedes your feeling of solitude. An occasional structure, corral, cabin, side road, does not greatly impact that experience.

But a large powerline does. It divides the valley into segments, it breaks the expanse, it intrudes the presence of people into your consciousness and that feeling of solitude is dashed. This may seem to be a purely aesthetic argument. You may say that it applies only to a few people. Well we don't think so. Those of us in the city are oppressed in many ways and as a release need open space areas, even if we can only drive through occasionally. When we do it should be an atmosphere as free as possible from urban care. We need the relief the country can bring us. Those living in the open west already well know the feelings I'm talking about, that's a reason they like it there. However we, the public, haven't well defined our need for this "aesthetic" requirement. Well we're putting it forth and think more and more of us will be demanding it as a consideration in regional planning.

No inventory of open space valleys exists as yet. Lets start one. As an agency required to take the long view, keep this issue in mind, you will be hearing more of it. Meanwhile don't give away open areas easily. Hold onto them fast until we can make better regional assessments which give proper weight to long range needs such as this.

LETTER #B-6
COMMENTS

VISUAL IMPACT CRITERIA MISWEIGHTED

J We have a large problem with the general method used to evaluate visual impacts in projects such as these. You give lip service to the idea that the impact of the first powerline is greater than an additional one, but seem to evaluate impacts based upon a persons viewing per day scale. This means that where this powerline will cross a main highway which already has another powerline in the same corridor, a high visual impact rating is accrued because a lot of people per day see the new added powerline. When a new powerline is built across a now clear valley with only a few dirt road travellers per day, a lower impact rating results.

This is wrong. It fails to weight the initial impact of the first intrusion. The first built powerline changes the open space character of the valley enormously. Any first powerline should be rated as having high visual impact on every currently open space valley it proposes to cross.

ARCHEOLOGICAL IMPACT SIGNIFICANT

The EIS does make a stab at quantitative impacts upon unstudied archeological sites in the path of the powerline. The estimated number of significant sites is stunning. This should put you on guard as caretakers of our Public Lands. These sites can't be replaced. When they are disturbed they become like Humpty Dumpty, they don't go back together again. You have chosen a natural north-south corridor for the proposed powerline. We have found over and over again that choices we make for routes of travel are the same that other people going before us have chosen. People and animal travel patterns will naturally congregate in these natural corridors. So, naturally, will the sites and evidence of stone age man in the Great Basin.

K Your estimates of site concentration may be accurate but they may also represent a concentration of the total sites in the larger region of the Great Basin, especially along valley margins when the climate allowed damper conditions. There is no regional study placing these estimated sites in a larger context of possible total sites for the

RESPONSES

J 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 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).

Most of the roads and highways within the study area were considered a moderate visual sensitivity. For example, roads leading to WSAs and Wilderness areas were considered high sensitivity while Interstate 80 was considered of moderate sensitivity. Only roads designated as scenic highways or byways were considered high sensitivity viewpoints. Residences were all considered a high sensitivity viewpoint regardless of the number of persons in residence.

K Because cultural resources in the project area are largely unknown, it cannot be demonstrated that "a larger than acceptable slice of a certain type of site" will not be lost. However, the regional study used in determining the alternatives for detailed consideration ensured that the vast majority of the most significant known cultural resources were avoided (refer to pages 3-88 and 3-89 of the SWIP DEIS/DPA). The discussion of cumulative impacts (refer to pages 4-85 and 4-86 of the SWIP DEIS/DPA) indicate that the project is likely to result in only a minor incremental loss of the regional resource base. Detailed inventories, evaluations of significance, and development of avoidance or mitigation measures will be carried out in consultation with regulatory agencies if the project is approved for construction.

LETTER #B-6
COMMENTS

RESPONSES

K | region. Are we losing a larger than acceptable slice of a certain type of site? How
L | can we know this without the broader look being taken. Another reason for you the
L | Public Lands caretaker to pause and stand on the side of conservation.

SUMMARY

Thanks again for the opportunity to comment. We have reviewed the EIS and discussed it in our Study Group. We have alerted other concerned people regarding the impact of this project and hope that you will strongly consider our arguments.

In summary:

The EIS has identified the huge adverse local impact of this project.

The EIS has not done an adequate job of evaluating regional impacts.

The EIS has wrongly discarded possible alternatives routes with existing powerlines.

The EIS has not presented a compelling benefit to justify even the impact identified.

LETTER #B-6
COMMENTS

RESPONSES

For these reasons you should:

SELECT THE NO ACTION ALTERNATIVE

If you have any questions regarding these comments please contact us as noted below.

Yours truly,

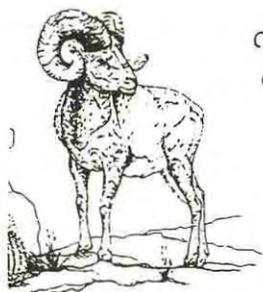


Steve Tabor - President
510 357-~~6585~~
6585



Bob Ellis - Communications Director
510 482-0466

LETTER #B-7
COMMENTS



Fraternity Of The Desert Bighorn

Box 27494 Las Vegas, Nevada 89126-1494

September 16, 1992

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

Dear Mr. Simonson:

The Fraternity of the Desert Bighorn is pleased to provide this input to the Southwest Intertie Project (SWIP) Draft Environmental Impact Statement (EIS). Our comments are limited to Link 720 that crosses the southern portion of the Arrow Canyon Range.

A [On page 4-14, second paragraph, the EIS mentions two bighorn sheep water developments in the southern end of the Arrow Canyon Range, and that the BLM has recommended no new access within two miles of water and no winter construction. For your information the two water developments are three miles apart and Link 720 is planned to go between them. The EIS does not assess any impact on these critical water sources. How do you plan to avoid sheep watering developments by two miles when they are only three miles apart?

RESPONSES

A Your concern for the impact of the road through the Arrow Canyon Range, and the impact of increased public access on desert bighorn sheep is understandable. However, it is not necessary to re-route this transmission alternative to accommodate this concern. The most appropriate means of reducing impact to bighorn sheep would be to re-contour and rehabilitate the road (refer to mitigation measure #4 in Table 1-6). Limiting construction to winter months (mitigation measure #4) would further reduce the impact to bighorn sheep populations.

Minimizing or eliminating impacts to these water sources will be fully addressed in the Construction, Operation, and Management (COM) Plan for the project. Possible scenarios that will be explored include seasonal construction limitations, no new road construction, re-contouring and closing the existing road, and fencing or obstructing public access to the area. Refer to page 1-34 of this document for more information regarding the COM Plan.

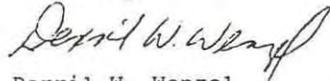
LETTER B-7

LETTER #B-7
COMMENTS

B [The road that splits the two developments has never had an environmental assessment. It was constructed illegally for an off-road race after the two water developments were constructed. The Stateline Resource Area Manager did not approve the road for racing because local television networks became aware of the illegalities. Any construction or commercial access along this road is probably illegal and subject to protest without a proper environmental impact statement.

Thank you for the opportunity to comment on the SWIP EIS.

Sincerely,



Derril W. Wenzel
President

" A MEMBERSHIP UNSELFISHLY DEDICATED TO THE UTILIZATION,
CONSERVATION AND WELFARE OF THE DESERT BIGHORN SHEEP"

RESPONSES

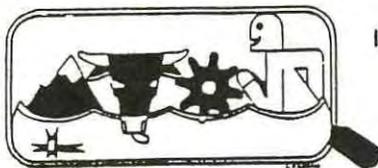
B It is not expected that the proposed access road construction will have a significant impact to the surrounding area. Any increase of access to public lands for this project will follow federal road management policies outlined in management guidelines or EISs. It is possible that new roads or roads with controversial uses can be locked.

There is an existing dirt road approximately 3/4 mile from the most southerly water development. This existing road runs for 2 1/4 miles and dead-ends. This road was located on our October 11, 1976 aerial photography, and was present when the second water development was constructed. This second catchment to the south of the existing road was constructed after the road was built. In the mid-1980s an extension of this road was illegally bladed for a distance of approximately 1/2 mile. However, it was not used as part of the Mint 400 ORV race course in 1985, or in any other event. The road does not tie into other roadways and the road is not held by a right-of-way.

The road is not new, and it may be used for construction access before being closed and rehabilitated. An alternate route around the southern tip of the Arrow Canyon Range may also be considered. Construction of the SWIP during the critical periods for bighorn sheep can be avoided.

The purpose of the SWIP DEIS/DPA was to assess the potential impacts of the construction, operation, and maintenance of a 500kV transmission line, not the potential impacts of an existing road that is located near bighorn sheep water developments.

LETTER #B-8
COMMENTS



INTERMOUNTAIN WATER ALLIANCE A

721 Second Avenue
Salt Lake City
Utah 84103

September 10, 1992

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

Dear Mr Simonson:

Concerning the Southwest Intertie Project Draft Environmental Impact Statement and Draft PL&R Amendment:

After I read the Draft Statement, I wondered how many more interties will be built across the western United States. Will each power company build north-south interties to take advantage of seasonal use of electricity and water? Will each power company build east-west interties to take advantage of coal supply in Montana, Wyoming, Utah and Colorado and Hydropower in California? And it became apparent that each intertie has to have its own corridor. And each proposal will no doubt utilize public lands because they are cheap.

A [There does seem to be an assumption that the White Pine Power Project will be constructed and hence the Southwest Intertie route runs through Steptoe basin. What is the status of this Power Project? With all the surplus potential (Intermountain Power Project with plans for a unconstructed 1500 megawatts, for instance) within the west due to poor projections of need of electricity, perhaps all reference to both the White Pine Power Project and the Thousand Springs Power Project should be eliminated and the routing and corridor re-examined. (See Page 1-4)

B [When one looks at projections of energy demand (Page 1-5) from 1990 to the year 2000, perhaps one should also look at the same projections from the same region from the same North American Electric Reliability Council from the years 1980 to 1990 in which all the surplus capacity in Arizona, New Mexico, Utah, and other western states was constructed based on similar projections. Past projections have been a financial disaster for

RESPONSES

It is appropriate to address both the White Pine Power Project (WPPP) and the Thousand Springs Power Project (TSPP) in the SWIP DEIS/DPA. These projects are considered "reasonably foreseeable" future actions that NEPA guidelines direct to be addressed. The WPPP, although no construction dates have been scheduled, is an option in future resource planning for the LADWP and other participants. Although the TSPP has been canceled, the region where the TSPP was proposed is a proposed series compensation station for the SWIP and the likely future location for possible interconnections with the SWIP in northeastern Nevada.

The LADWP, as have many utilities throughout the country, has implemented conservation, load management, and customer energy efficiency programs. The LADWP has projected a deferment of 600MW of supply-side resource requirements by the year 2000 as a result of implementing demand-side management programs. When these programs are combined with this proposed transmission system that will provide access to the surplus generation in the Northwest and Intermountain regions of the country, the LADWP could defer the need for major new generating plants during the next ten years.

Because of the financial risk associated with the large capital expenditures required to build new generating facilities, utilities are reluctant to commit to large new projects. The cost of the transmission system, when associated with generation projects, is a relatively small percentage (10 to 15 percent) of the total project costs. Getting these projects on-line is often delayed while the transmission system is permitted and constructed. Permitting of major projects must start many years before they are to be brought on-line. Therefore, the LADWP believes that it is prudent to have transmission lines permitted or actually in place before making the financial commitment to construct a generating plant.

B [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

LETTER #B-8
COMMENTS

B utilities and regional economies in the late 1980's and the present time. The Nevada projections (Page 1-7) suggest that gold mining will continue indefinitely and this industry consumes somewhere near 50% of Sierra Pacific production of electricity (It should be noted that the gold prices have been declining as gold production throughout the world surged in recent years and continued decline of gold prices will bring about mine closures.) The extensive expansion of the gambling industry may be at the expense of others as each new expansion obtains clientele from the previous expansion suggesting that bankruptcy may be the new industry in Las Vegas.

C ON Page 1-12, it is stated that "access to surplus northwest hydropower may reduce the risk of uncertain future oil and gas prices for southwest generation". Perhaps there will be no surplus northwest hydropower if the threatened and endangered salmon are given their fair share of water. Perhaps the intertie as proposed will be only one direction: from the excessive capacity of the New Mexico and Arizona utilities to the northwest.

D Through the report there is mention of the Powerplant and Industrial Fuel Use Act (PIFUA) of 1978 which discourages the use of fuel oil and natural gas for generating electricity (see Page 1-12). Is this Act still applicable? It seems that many utilities in the west are again utilizing fuel oil and natural gas. Further the Department of Energy is proposing multi-fuel plants that burn coal, fuel oil and natural gas. I propose here that throughout the report where PIFUA is used, it is used as a un-necessary justification of the Intertie Project.

Although Idaho Power has an excellent conservation program, its continued support of all-electric homes suggest that some of the conservation programs are self-serving. Certainly natural gas is cheaper and cleaner for heating. And the change from mercury vapor to high pressure sodium light may cause more light pollution. Page 2-2).

E Is Idaho Power the sole owner and operator of the Jim Bridger plant (see Page 2-3) as is suggested in the text?

F Page 2-5: "Through energy conservation and load management can somewhat reduce energy consumption, they affect energy use and system reliability on a local rather than a regional basis". What is the basis of this statement? It seems that if every utility as such a program it would affect energy use and system reliability on a regional basis.

G Page 2-6. Reference is made to 362 MW of transmission capacity between the Northwest and UP&L system. What capacity is between UP&L system and the south west (four corners region). Is there any plans by Pacific Power to upgrade this entire system in which the proposed Southwest Intertie would become obsolete? Does Californians have access to Arizona and New Mexico surplus electricity (i.e., is there an east-west intertie in the southern tier of states)?

RESPONSES

options allows the actual commitment to construct a resource to be made when forecasting uncertainty has been reduced as much as possible. By increasing the number of resource options available to a utility, the SWIP will serve as a tool for reducing the risk of overbuilding or underbuilding generating resources as a result of load and resource uncertainties.

C Because weather conditions are not predictable, hydropower is a variable resource for utilities. There are many proposals now being considered to determine how the federal dams on the Columbia River system will be operated. It is unknown how the Columbia River operations and the salmon recovery plan will affect Northwest-Southwest power exchanges at this time.

D That is correct. PIFUA is no longer applicable, and it is an inappropriate justification for the SWIP. It has been removed in this document (refer to the Errata in Chapter 4 of this document).

E PacifiCorp and the IPCo jointly own the Jim Bridger Power Plant. PacifiCorp is the operator of the facility.

F The statement that conservation affects energy use and system reliability on a local rather than a regional basis is meant simply to indicate that the conservation programs of individual utilities, like their generating resources, have a localized impact. Of course, conservation throughout the western region certainly will have an impact on overall future generating resource requirements in the region.

By reducing new regional generating requirements, however, conservation does not correspondingly reduce the value of regional transmission for minimizing resource costs. Even with reduced generating requirements, environmental and economic considerations may require the placement of new generation at substantial distances from population and load centers, thus requiring new transmission such as the SWIP. Also, because of the seasonal diversity which exists between Northwest and Southwest loads and resources, purchases and exchanges of power over the SWIP are expected to help the entire region meet load growth by utilizing existing resources more efficiently. Finally, regional conservation potential may be developed more fully given the availability of adequate regional transmission. Without such transmission, the cost effectiveness of conservation programs must be determined on the basis of the avoidable generating resource costs of an individual utility.

LETTER #B-8
COMMENTS

H Page 2-10. It seems that the corridor along the Wasatch Front is eliminated because of realstate costs, and that some power would flow to other lines, and the lack of connection with Ely. These excuses are rather shallow since the same problems would occur in some areas between Ely and the southern routing due to narrowness of the corridor. Routing to Ely is comparable to routing from Ely to Intermountain Power Project and considered as a separate project within this environmental statement. Certainly the higher realstate costs compensate for the lack of environmental problems associated with the existing corridor.

I Page 2-11 again brings up PIFUA. Although it is true that oil and gas are more expensive for baseload generation, seasonal use and peaking power use of these energy sources are economically justified in every region of the country. The Southwest Intertie proposal is one alternative to the use of seasonal and peaking use of energy. Oil and gas energy in peaking facilities is an equivalent use and should not be summarily dismissed. And what is the status of PIFUA, 1978? See above comment?

J What is not discussed in this Environmental Impact Statement is that all these Intertie Proposals can bring both regional stability of electrical use and regional instability of electrical use. The report only mentions the first first use. The best Utility will operate the best at local situations where it has first hand information. Once a utility is connected to interties and computers, it no longer can control local effects of electrical storms, fires, earthquakes as these effects will now affect the entire region and these effects can reduce reliability at the local utility. These are the trade-offs. Should events in Las Vegas and Los Angeles affect the people of Idaho?

Thus these criticisms are directed at the project purpose and planning. I have seen similar projects proposed in the passed with all their internal justification and these projects were not needed and they cost the ratepayers much money and only promoted the utility administration. After reading the Environmental Impact Statement on the Southwest Intertie Project, I sense a very similar self-justification as the recent Thousand Springs Power Project proponents used. Hence I suggest a ten year delay in the construction of the Southwest Intertie project.

RESPONSES

Utilities having a lower avoided cost will be able to develop conservation resources to a lesser degree than utilities with a higher avoided cost. Transmission can enable the development of conservation throughout the region at a level determined by the highest avoidable generating costs in the region.

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 should 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 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 load diversity within the region. Transmission will 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 (i.e., generation) can be reduced by using transmission. When new regional generating resources are needed, transmission, such as the SWIP, would make more resource options available, and would help minimize costs and environmental impacts.

Because of the seasonal diversity that exists between the Pacific Northwest and the Desert Southwest, loads and resources, purchases and exchanges over the SWIP would be expected to help the entire WSCC region meet load growth by utilizing existing resources more efficiently. Regional conservation potential may be developed more fully given the availability of adequate regional transmission.

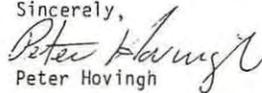
Also refer to the expanded discussion of purpose and need in Chapter 3 of this document.

G The Western Systems Coordinating Council (WSCC) reports the non-simultaneous transfer capability between Utah and Arizona at 550-590 MW.

LETTER #B-8
COMMENTS

The second aspect of the EIS is the selection of the alternative routings through and among some very sensitive ecological habitats. In this respect, the EIS did a good job in the description of the environments and route selection (even though the necessity of the project is questionable!).

Sincerely,



Peter Hovingh

Trustee,

Intermountain Water Alliance

RESPONSES

PacifiCorp has requested 240 MW of capacity on the SWIP. This interest expresses their desire to utilize the SWIP to help serve their increasing regional transmission needs.

California is heavily interconnected with the Southwest. The WSCC reports the non-simultaneous transfer capability in an east to west direction at 5700 MW. However, most of the firm capacity is committed to moving existing resources to California. A proposed transmission line from southern California to southern Nevada could increase the available capacity for east-west transfers.

H When the SWIP was originally proposed to terminate in the Delta, Utah area, alternative routes through the Salt Lake City area were possible, at least from a system connection standpoint. Several facts changed after the routes through the Salt Lake City area were first considered. First, the Utah-Nevada Transmission Project (UNTP), of which the SWIP was intended to interconnect near Delta, was found to be fully subscribed (i.e., did not have the capacity for the SWIP). This made a termination of the SWIP in Delta infeasible. The project description was then changed to extend the project from the Ely area to the Las Vegas area. Las Vegas is the termination of the UNTP and is considered "marketplace". One of the SWIP's goals was also to reach "marketplace". Second, the Ely area was also seen as a potential marketplace. For example, an interconnection with the existing 230kV system is viewed as a possibility. And finally, land use conflicts in the Salt Lake City area would have been very difficult to overcome.

I The cost effectiveness of a gas- and oil-fired generating resource for peaking applications cannot only be maintained, but can be enhanced, by transmission which would allow the resource to serve peaking loads in one part of the region during one season and peaking loads in another part of the region during another season. The SWIP would affect regional resource construction and operation only to the extent that it would provide resource alternatives which would be superior to existing alternatives.

PIFUA is no longer applicable and it is an inappropriate justification for the SWIP. It has been removed in this document (refer to Errata in Chapter 4 of this document).

A benefit of the SWIP is to postpone the requirement of utilities in the WSCC

LETTER #B-8
COMMENTS

RESPONSES

region to construct additional generation facilities. The discussion on 2-11 of the SWIP DEIS/DPA focuses on cost differential between fuels. The fuel costs associated with these generation facilities represent about one third of the total production costs. While fuel costs are significant and represent a major economic savings for short-term transactions, long-term reductions in generating capacity are more significant.

J The IPCo system has been interconnected with other utilities in the WSCC region since the 1940s. The events in the Las Vegas and Los Angeles areas already impact the IPCo system. The main reason for interconnecting different regions is to improve the reliability of each system. An interconnected system provides for a more robust and stronger electrical system allowing the regions to help each other during a disturbance. One of the main functions of the WSCC is to evaluate system reliability and minimize the effect of disturbances on other utility systems. The addition of the SWIP could significantly improve system reliability in the WSCC region, including the IPCo system.

LETTER #B-9
COMMENTS



RUSSELL D. BUTCHER
Southwest-&-California Representative

August 12, 1992

RE: DRAFT SOUTHWEST INTERTIE
PROJECT EIS & DRAFT PLAN
AMENDMENT DEIS/DPA

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

Dear Mr. Simonson:

National Parks and Conservation Association, a 300,000-member nonprofit organization, founded in 1919 to promote the protection, enhancement, and public understanding of the National Park System and related public lands, appreciates this opportunity to respond to the BLM's draft Southwest Intertie Project environmental impact statement and draft Plan Amendment DEIS/DPA. We are focusing our comments exclusively on the "Crosstie Alternatives," as follows:

(1) We urge that it is appropriate for the public to sincerely challenge the basic justification for the "Crosstie" line from eastern Nevada (where the Southwest Intertie line is to be located) into western Utah. As we understand this proposal, it was not originally part of the Southwest Intertie Project, but was subsequently added to it. Therefore, it gives the appearance of not being an integral or essential component of the Project. To drop out this controversial Crosstie line would consequently seem to have no detrimental impact upon the Intertie Project. Given the fact that much environmental or other controversy revolves around the Crosstie, we strongly

RESPONSES

A The Ely to Delta segment of the SWIP has been a part of the SWIP from the beginning. The portion from Ely to Dry Lake was added later in the EIS process. The reason the Ely to Delta segment was maintained in the SWIP DEIS/DPA document is explained on pages 2-31 and 2-32 of the SWIP DEIS/DPA. The Ely to Delta segment was originally a joint SWIP and Utah-Nevada Transmission Project (UNTP) transmission line segment. When the SWIP was amended in June 1990, the IPCo's need for the Ely to Delta segment changed. However, this segment remains an important link to the UNTP and the need for it remains unchanged.

When the SWIP was originally proposed to terminate in the Delta, Utah area, alternative routes through the Salt Lake City area were possible, at least from a system connection standpoint. Several facts changed after the routes through the Salt Lake City area were first considered. First, the UNTP, of which the SWIP was intended to interconnect near Delta, was found to be fully subscribed (i.e., did not have the capacity for the SWIP). This made a termination of the SWIP in Delta infeasible. The project description was then changed to extend the project from the Ely area to the Las Vegas area. Las Vegas is the termination of the UNTP and is considered "marketplace". One of the SWIP's goals was also to reach "marketplace". Second, the Ely area was also seen as a potential marketplace. For example, an interconnection with the existing 230kV system is viewed as a possibility. And finally, land use conflicts in the Salt Lake City area would have been very difficult.

LETTER #B-9

COMMENTS

RESPONSES

A | recommend that it be deleted from further planning...at least unless or until far greater justification for investing in this line can be provided in the future.

(2) Regarding the Crosstie Alternatives, we very emphatically oppose the Agency (BLM) Preferred Alternative between Ely, NV, and Delta, UT. While National Parks and Conservation Association has usually supported and even at times encouraged BLM's policy of placing new transmission lines within existing corridors, there are several reasons why we oppose doing so in this instance:

(a) Had the existing 230kV line (through Sacramento Pass at the north end of the South Snake Range) been subjected to the present-day standards of NEPA-mandated environmental impact studies and had Great Basin National Park already been established, we are confident ^{of the} routing would then have been selected, thereby leaving this scenically spectacular route free of the visual impacts of the 230kV line and free, as well, from the threat of transmission line expansion, like the proposed 500kV facility.

(b) We oppose the large-scale 500kV transmission line--even with visually mitigating design and color of the towers and the use of non-specular cable--because of the significant visual prominence the line would have, both from within many key parts of the national park and from stretches of the highway that offer motorists with grand, unobstructed views of the park and its magnificent mountains.

(c) The existing 230kV corridor is a round-about routing for the proposed 500kV Crosstie; and given (a) and (b), above, if any line is built, we strongly prefer a more direct corridor: either the Direct Route, which is clearly the shortest and therefore, we assume, the least costly option; or the Cutoff Route, which would utilize an existing 230kV corridor for about half its length--and which the document characterizes as the environmentally preferable alternative.

While we understand BLM's reluctance to push a new powerline through largely undisturbed landscapes, as would occur along the Direct Route and along about 50 percent of the Cutoff Route, we urge that environmental impacts of the 230kV Corridor Route would be even greater--particularly in relation to one of America's magnificent units of the National Park System. Nor should we ignore the likelihood that sometime in the future, a second and

LETTER #B-9
COMMENTS

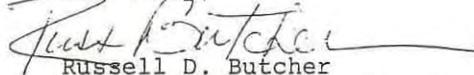
even a third 500kV transmission line will be proposed to expand the capacity of the Crosstie (again assuming that the Crosstie can be justified in the first place).

B [Regarding the Leland Harris Spring complex, would it not be reasonable, as frequently occurs along other powerline and pipeline projects, to simply shift the alignment far enough from such sensitive resources as to avoid the concern? We doubt seriously that the presence of this spring and other wetland habitat is reason enough to argue against the Direct Route.

C [Regarding the argument concerning low military training flights, it seems unreasonable to conclude that the Department of Defense would be unwilling to make some adjustments in its flight patterns, should either the Direct Route or Cutoff Route be determined to be in the best public interest.

In summary, we very strongly urge a thorough re-evaluation of a NO-ACTION Alternative for the Crosstie proposal. Of the suggested alternative corridors, we very strongly oppose utilizing the existing 230kV corridor--because it shouldn't have been selected as a transmission corridor in the first place; because of the visual impacts upon adjacent Great Basin National Park; and because shorter and presumably less costly alternatives exist under the Direct Route and Cutoff Route alternatives. Rather than adding transmission lines to the 230kV Corridor Route and thereby increasing the visual impacts of that route, we would like to hold out the hope that the existing 230kV line may ultimately be removed in the future, so that this scenically outstanding area could be restored to a natural condition. This "window of opportunity" is before us now. Were one or more 500kV lines added, that window would be closed virtually forever. We hope you will seize the moment on this worthy opportunity...before it is too late.

Sincerely,



Russell D. Butcher
Pacific Southwest Regional Director

RDB/prb
cc: Sup't Al Henderson,
Great Basin Nat'l Park
NPCA headquarters

RESPONSES

B The Leland Harris Spring complex encompasses an area that is actually larger than it seems. The complex stretches for many miles in either direction from the alignment of the Direct Route. Throughout the Snake Valley occur many natural springs and wetland habitat for certain species of fish, frogs, and butterflies which are dependent on the springs for their survival. To simply shift the alignment of the transmission line would not be enough and it could add another ten to twenty miles to the corridor. The species within these springs [Category II and Endangered (one species)] have also not been mapped because of wetland soils and the possibility of underwater tributaries which would make this area even more sensitive. The presence of the Leland Harris Spring complex is certainly not the only impact along this route. The impacts to flight operations in the R-6504 Restricted Area, visual impacts, cultural resources, and other biological concerns all combine to present problems with this route.

C Regarding the Direct Route and the R-6504 Restricted Area, the Department of Defense has stated in correspondence that building any towers over 30 feet in height is unacceptable due to constant use of the area by military missions and exercises as part of the Utah Testing and Training Reserve (UTTR). The UTTR is one of the largest training areas in the West still operable and able to maintain a large variety of missions. Also as more bases are being closed by Congress, it is very unlikely the Department of Defense will easily relinquish alterations to its Restricted Area. It is incorrect to state that the military is unwilling to negotiate on the routes through the Military Operating Areas (MOAs) on the other Ely to Delta segment routes. There is agreement where towers would be kept to 105 feet or less through specified areas to minimize impacts to low-level flying operations.

LETTER B-9

LETTER #B-10
COMMENTS

RESPONSES

NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)

WINNERS:

1974 Hilliard Memorial Award (RONICDE)
1981 Desert Wilderness Conference Award
1987 Desert Protective Council Award
1989 Chevron Conservation Award

Founded 1958

HONORARY LIFE MEMBERS

Charles S. Watson, Jr.
Carson City, Nevada
Alvin M. Lane
Reno, Nevada
Darwin Lamperl
Luray, Virginia
Prof. Ross Smith
L. N. R., Reno, Nevada
Jeff Van Et
Las Vegas, Nevada
Howard Booth
Las Vegas, Nevada
Carola Hutcheson
Carson City, Nevada
Harold A. Kantrud
Jamestown, North Dakota
Hugh C. McMillan
Bedford, New York
C. Clifton Young
Reno, Nevada
Richard Pough
New York, New York
Marjorie Sill
Reno, Nevada
Michael Frome
Moscow, Idaho
Grace Bukowski
Reno, Nevada
Russell Pringley
Burns, Oregon
John B. Aymer
Reno, Nevada
Clifton R. Merritt
Denver, Colorado
Kirk A. Peterson
Reno, Nevada
Dr. Richard Bazgen
Gabb, Nevada
William Meiners
Boise, Idaho

September 3, 1992

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

Re: Draft Environmental Impact Statement/Draft Plan
Amendment (DEIS/DPA) on the proposed Idaho Power
Company 500kV Transmission Line (Southwest Intertie
Project).

Dear Mr. Simonson,

Please accept these comments on the above
referenced DEIS/DPA on behalf of the Nevada Outdoor
Recreation Association and Paul C. Clifford, Jr. both
jointly and severally. Please send each of us a copy of
the Final Environmental Impact Statement/Proposed Plan
Amendment (FEIS/PPA) and Record of Decision at our
addresses listed below.

The Bureau of Land Management and Dames and Moore
are to be congratulated on producing a document
reflecting remarkable consensus in an exceedingly
difficult endeavor, namely the siting of a major
electric power transmission facility. WE SUPPORT THE
AGENCY PREFERRED ROUTE FOR BOTH THE SWIP AND CROSS-TIE.
From our point of view there is only one major
difficulty regarding routing alternatives - the choice
of the Cut-off route as the environmentally favored
alternative for the Cross-tie, which will be addressed
below. However, certain other questions also remain.

LETTER B-10

LETTER #B-10
COMMENTS

Amy Mazza
Reno, Nevada
Roscoe P.iland
Sea Ranch, California
Roger Scholl
Reno, Nevada
Drummond Pike
San Francisco, California
Charles H. Carlson
Denver, Colorado
Charles H. Stoddard
Minong, Wisconsin
Paul Clifford
Cleveland Heights, Ohio
Harriet Allen
San Diego, California

Unfortunately, a number of proposed activities by A various public and private entities including, but certainly not limited to, land transfers between the public and private sectors (particularly for utility rights of way), transfer of water from one basin to another within Nevada and interstate or international transfers of water by pipeline and/or aqueduct through eastern Nevada, have forced the citizens of eastern Nevada to be very wary of all large scale projects such as the SWIP. As a result, can you answer for us some basic questions which do not seem to be directly or adequately addressed in the DEIS?

ISSUE 1) The SWIP as documented in the DEIS is really two distinct projects: Midpoint to Dry Lake (what is now referred to as SWIP) and the Cross-tie (Ely to Delta). The bulk of the SWIP (however defined) is situated in Nevada. Both SWIP and the Cross-tie have major impacts in the Ely BLM District. Idaho Power Company will not be responsible for the Cross-tie in any way. They have agreed to transfer their rights to any Cross-tie transmission right of way to the Los Angeles Department of Water and Power.

A QUESTION 1) Why was this project permitted to so change its character that the areas with the greatest impacts were left with no control over the development, management, and determination of alternatives, unless this is a callous, calculated maneuver to limit the adverse reaction anticipated from those excluded from the management loop?

B QUESTION 1A) Why is the "Cross-tie" not a separate issue, under the jurisdiction of either Utah or Nevada BLM? This project does not enter Idaho at all. The entity which is to actually use the right of way is from California, not Idaho. What is the rationale for Idaho BLM to be the lead Agency? Most of the controversy about the Cross-tie concerns lands in the Ely BLM District. Will the ELY BLM District be essentially granted the lead role in determining the suitability of the several Cross-tie routes through its District for the Final Record of Decision? C

C QUESTION 1B) Will this DEIS/DPA set a precedent for starting a relatively limited project in an area where favorable administrative review might be anticipated, and then gradually changing and expanding the program into areas

RESPONSES

The Ely to Delta segment of the SWIP has been a part of the SWIP from the beginning. The portion from Ely to Dry Lake was added later in the EIS process. The reason the Ely to Delta segment was maintained in the SWIP DEIS/DPA document is explained on pages 2-31 and 2-32 of the SWIP DEIS/DPA. The Ely to Delta segment was originally a joint SWIP and Utah-Nevada Transmission Project (UNTP) transmission line segment. When the SWIP was amended in June 1990, the IPCo's need for the Ely to Delta segment changed. However, this segment remains an important link to the UNTP and the need for it remains unchanged.

When the SWIP was originally proposed to terminate in the Delta, Utah area, alternative routes through the Salt Lake City area were possible, at least from a system connection standpoint. Several facts changed after the routes through the Salt Lake City area were first considered. First, the UNTP, of which the SWIP was intended to interconnect near Delta, was found to be fully subscribed (did not have the capacity for the SWIP). This made a termination of the SWIP in Delta infeasible. The project description was then changed to extend the project from the Ely area to the Las Vegas area. Las Vegas is the termination of the UNTP and is considered marketplace. One of the SWIP's goals was also to reach marketplace. Second, the Ely area was also seen as a potential marketplace. For example, an interconnection with the existing 230kV system is viewed as a possibility. And finally, land use conflicts in the Salt Lake City area would have been very difficult.

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

B The BLM is the designated Lead Federal Agency. The BLM Director assigned Idaho as the lead state for meeting BLM NEPA responsibilities on this project on October 31, 1988. It has remained so during the various changes in the project. This is explained in Chapter 2 of the SWIP DEIS/DPA. The Ely District of the BLM will be involved in the decision process. The Idaho BLM lead for the project by no means restricts Ely's input.

C No. Please refer to page 2-31 of the SWIP DEIS/DPA for an explanation of why the SWIP was expanded from the Ely area south to the Las Vegas area. Also refer to the response to comment "A" above.

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COMMENTS

C [where less favorable review or more controversial issues might be anticipated, even including changes of beneficial ownership of rights to the permitted activity (IPC to LADWP)?

D [QUESTION 1C) Where is the limit between reasonable convenience to the petitioner versus the need for real power in oversight and management of the permitting process by those potentially adversely affected? Why is it not reasonable to expect LADWP to deal with the ELY BLM District directly with regard to the Cross-tie? Why are mitigation measures of import to the Ely BLM District being determined by two surrogates, Idaho BLM and Idaho Power rather than those directly affected, Ely BLM and LADWP?

ISSUE 2) This DEIS/DPA is written in such a summary form that it is very difficult if not impossible to make any definitive decision or comment based on technical data. Such data are crucial to informed comment and are the heart of the requirements of NEPA, which mandates this DEIS/DPA. A very limited number of technical reports and data tables were printed and distributed to public agencies but not to individuals. NEPA also requires that all persons wishing to comment be heard. Those of us who have legitimate interests in the project, but who do not live conveniently close to a "file" copy are effectively excluded from informed comment. If expense is the issue, such expenses should be bourn by the petitioner and be a routine expense of the permit process. The respondent has no control over the magnitude of the project and hence the amount of technical data required to support the decision. NEPA requires that this data be available to all respondents.

E [QUESTION 2) Why were the technical reports and data tables not made available to ALL interested parties?

F [QUESTION 2A) There have been numerous mailings associated with this project. A form for requesting the technical reports and data tables could have been included in each of the last four mailings. Why was this not done?

G [QUESTION 2B) Since the technical reports and data tables were not made routinely available to individual respondents, which severely limits their ability to make informed comment, is this in fact a valid DEIS/DPA? Will the FEIS and Record of

RESPONSES

D Please refer to Response B above. The IPCo is the project proponent for the Ely to Delta segment because of the original right-of-way application. The LADWP has been involved in all aspects of the SWIP EIS process because of the IPCo's intent to request the BLM to transfer the right-of-way grant for this segment, if granted, to the LADWP. Again, the BLM in Ely has also been involved in every step of the EIS process, and will be involved in the decision process with the rest of the potentially affected BLM districts. If a right-of-way for the Ely to Delta segment is granted, the BLM in Ely will be directly involved with in the development of the Construction, Operation, and Maintenance Plans, as well as the actual construction, operation, and maintenance of the project. Refer to page 1-34 of this document for more information regarding the Construction, Operation, and Maintenance Plan.

E The technical reports and data tables were made available to all interested parties to review, as explained in Appendix H of the SWIP DEIS/DPA. Only a limited number of technical reports were printed because of the costs of printing and mailing the nine document sets. The alternative to making these limited number of documents available for public review would have been to restrict public review to the project files. The technical reports were produced to facilitate public review of all of the detailed studies without having to travel to Idaho. Additional sets of these documents were sent to the local libraries indicated on page 4-17 of this document.

F Refer to Response E above.

G Refer to Response E above.

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COMMENTS

G Decision be delayed until this deficiency is met by determining if anyone wishes to receive these documents and is given a reasonable and customary time to either enter a comment or amend comments already submitted?

ISSUE 3) The Federal Lands Policy and Management Act explicitly requires that existing designated utility corridors be used whenever possible when siting new transmission facilities. This portion of the law appears to have been totally ignored in formulating alternatives in this DEIS/DPA, even after citing this fact! Each of the BLM Districts traversed has an in place land use plan, which in effect constitutes a form of internal zoning. These plans delineate a number of utility corridors requested by the various utility companies. The DEIS/DPA contains no map of ANY existing designated utility corridors (utilized or empty). Existing long distance power transmission lines are shown only where they interact or enter the proposed right of way.

H QUESTION 3) Where are the currently existing designated utility corridors which are germane to this project (contained within the five map sheets)?

H QUESTION 3A) Where are the proposed or existing utility corridors for the proposed White Pine Power Project (WPPP)?

H QUESTION 3B) What relationship, if any, exists between the WPPP proposed or existing utility corridors and the proposed SWIP corridor?

ISSUE 4) Utility corridors are designated in the normal planning process within each agency's land use planning process, most particularly in Master Framework Plans (MFP) or Range Management Plans (RMP) for each BLM District. The SWIP has been in the making for many years.

I QUESTION 4) Why are segments now proposed (such as the Cut-off route) which lie outside any designated utility corridor, particularly when existing designated corridors fill the same transmission needs?

J QUESTION 4A) Of what use is the planning process if major modifications, such as totally new utility corridors, can be introduced outside the scope of the general planning process?

RESPONSES

H Please refer to Chapter I of this document for this discussion and for maps (Figure 1-1 and 1-2) of the designated and planning corridors.

I The NEPA process mandates evaluating "reasonable and feasible" alternatives which in this case include routing alternatives which lie outside of designated utility corridors. The Record of Decision for the SWIP may amend Management Framework Plans and Resource Management Plans for the BLM if appropriate. This is why the EIS process is combined with a plan amendment process.

The Federal land management agency will retain ownership of the land within the right-of-way. For private lands, an easement would be purchased from the land owner, but the private land owner would still own the land unless a fee purchase was made by the utility company.

J A planning process must be dynamic to respond to changes. When land use plans are completed, the plans are responsive to the resource issues at that point in time. A land use plan must have the flexibility to be responsive to changing situations or new information. That is the reason why the BLM regulations allow for plan amendments. Like any new land use plan, land use plan amendments also require public input and allow for public comment.

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COMMENTS

ISSUE 5) Land ownership and control of use of the right of way is also a concern.

K [QUESTION 5) Who will own the land contained within the right of way?

L [QUESTION 5A) Who will control additional or ancillary uses of the utility corridor/right of way for uses other than the direct construction, maintenance, and utilization of the right of way for SWIP or the Cross-tie? What environmental safeguards will remain? Will additional uses require a formal EIS?

M [QUESTION 5B) Will creation of these utility corridors (assuming they are not already designated) facilitate their use by the current petitioners (IPC and LADWP) or others for the inter-basin transfer of water, interstate transport of water, or international transport of water through eastern Nevada by pipeline, aqueduct or any other means?

ISSUE 6) There are at least two major components of visual values and hence visual impacts. All other things being equal, the fewer people offended, the better. More fundamentally, there is the issue of introduced visual characteristics, i.e. what will be fundamentally changed. Throughout the DEIS/DPA this second component is totally ignored even though this is recognized as a legitimate issue, especially if the area is remote. This seems to be an acute problem wherever the environmentally preferred route is different than the Agency or utility preferred routes. However, since these are the only places that one can observe the independent interplay of issues in selecting a given route/alternative, one is left with little confidence that this criterion received more than passing lip service in any route determination.

N [QUESTION 6) Will the visual impacts of the project be re-thought in the FEIS and ROD to include the critical visual impact component of fundamental changes in the character of the viewshed and its surrounding area?

ISSUE 7) The choice of the Cut-off route as the environmentally preferred alternative for the Cross-tie project is most unfortunate, and we believe, does not withstand reasonable scrutiny. For the purposes of these comments, when we refer to the Cut-off route we are speaking only of links 262, 265, 266, 267, 268, a total distance of about 79 miles. The remainder of the route is coincident with the 230kV corridor

RESPONSES

K The land management agency or private land owner will retain ownership of the right-of-way.

L The land management agency will control the right-of-way for the uses designated in the right-of-way grant or special use permit. The National Environmental Policy Act will apply to any revisions of the operations other than what is stated as the permitted uses.

M Establishing utility corridors means potential use by other linear facilities. However, a right-of-way grant would be needed before any other project could be constructed. This would require complying with the National Environmental Policy Act.

N Impacts to the scenic quality of the landscape were assessed consistently for each of the alternative routes. Please refer to Volume III - Human Environment Technical Report for a complete discussion of the methods. Appendix H of the SWIP DEIS/DPA explains where the Technical Reports can be reviewed. Also refer to Appendix H in the Errata of Chapter 4 for locations where additional copies of the Technical Reports can be reviewed.

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COMMENTS

of which we approve. The Cut-off alternative was added relatively late in the decision making process to allay concerns raised by the Great Basin National Park concerning degradation of the ambiance and viewshed to the north of the Park. We are unaware of any instance in which the implementation of a transmission line enhanced the visual, aesthetic, or environmental quality of the corridor along its route. There is no "good" place to put a transmission line, only "less bad" locations. Certainly, the Cut-off route is among the worst that could be rationally proposed when judged from an environmental point of view. Perhaps this is the result of not developing all of the criteria for this route to the same degree as for other parts of the project such as the main SWIP alternatives - there is much white unassigned value along this route on the cultural and biological impact maps and much misinformation on the visual and land cover maps. All noted errors and omissions appear to undermine or under value the ecological integrity found along this route. In terms of data collection and evaluation, this route appears to be an afterthought. Whatever the reasons, the designation of this route as the best environmental alternative is totally unacceptable.

O QUESTION 7) Since the Cut-off route does not comply with the existing Schell Resource Area RMP which contains no provision for a utility corridor with this alignment and is in apparent conflict with FLPMA which provides that, where possible, future transmission lines should be sited in existing corridors and there being an existing corridor to achieve the same transmission goal, i.e. the 230kV Corridor, is the Cut-off alternative legally viable? Will the FEIS and Record of Decision be in accordance with the Schell RA RMP and FLPMA and/or delete the Cut-off Alternative?

P QUESTION 7A) With regard to the biological resources present along the Cut-off corridor, are you aware that there is CRUCIAL YEAR LONG and KIDDING GROUND use by antelope along essentially all of links 266 and 267? In fact, this area is sufficiently important that it was designated as the Antelope Game Refuge in the early 1920's by the State of Nevada. This refuge extended from the northern limit of the Mt. Moriah Unit of the Humboldt National Forest northward to the Elko/White Pine County Line and 15 to 17 miles westward from the Nevada/Utah State Line. This refuge was in existence until the mid to late 'Forties. During this time all big game was in real danger of extirpation in Nevada.

RESPONSES

- O Yes. The SWIP process may amend existing Resource Management Plans or other land use planning documents; a decision by the BLM to establish a route would also establish a utility corridor.
- P Major portions of Links 266 and 267 were identified as pronghorn antelope habitat, including pronghorn winter range. However, no crucial yearling or kidding ground designations were indicated to the document preparers for these links during the inventory. Similarly, the preparers were never informed of the antelope refuge.

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COMMENTS

P | Were the existence of the refuge and both the biological and cultural/historical significance of this area known to the evaluators? Will these factors be considered in the FEIS and Record of Decision?

Q | QUESTION 7B) A statement is made in the DEIS (page 3-18, Wildlife, wild horses and burros) that "none occur within the study corridors". In point of fact the Cut-off corridor crosses at least two herd areas in Nevada, the Antelope Herd Management Area and the Mt. Moriah Herd Management Area. Both of these HMA's have very real horses in them! Are the preparers of the DEIS aware of these HMA'S? Why are they not considered at all? Will the FEIS and Record of Decision reflect their existence?

R | QUESTION 7C) Virtually the entirety of the Cut-off route in Nevada is in prime Ferruginous Hawk habitat. While buried in the text, why is this not depicted on the Biological Resources Map #3 & #4? The open sage to scattered pinion/juniper stands of the adjacent mountains are the ideal habitat for this species. Will their presence along this corridor be recognized and given weight in the FEIS and Record of Decision?

S | QUESTION 7D) At least link 267 crosses an unusual succulent transition zone giving rise to most peculiar appearing cacti. This statement is based on observations made by Alvin McLane of the Desert Institute at the University of Nevada-Reno. Why is this area not given consideration in the DEIS? Will the FEIS and Record of Decision reflect the existence of this transition zone?

T | QUESTION 7E) Why is there a large (presumably barren) playa area on link 267 between miles 15 and 20? There are no playas at this location. The playas are about 3-4 miles west. What does occur are fairly large stands of winterfat on a gently rolling terrane with a general westward slope of perhaps 5%, which might give similar reflectance from satellite imagery. On the ground no one should make this mistake! It is in part this large percentage of winterfat that makes this excellent winter range for antelope and other big game species, such as elk which are moving into the area from both north and south. Will someone actually go out and properly evaluate the environmental suitability of this route on the ground before the FEIS and Record of Decision? Will the FEIS and ROD reflect the actual facts as they are on the ground and

RESPONSES

Q This has been corrected in the Errata in Chapter 4 of this document. Refer to page 3-35 under Herd Management Areas.

R One of objectives in mapping resources was to illustrate the occurrence of discrete, relatively sensitive biological features. Where ferruginous hawk habitat was represented by discrete units within a link, it was mapped. Where it occurred essentially throughout a link, the BLM did not map it. The same is true of pronghorn habitat. The BLM mapped discrete elements of pronghorn natural history (e.g., crucial wintering grounds), but did not attempt to map all pronghorn habitat in the study area. The presence of ferruginous hawks throughout this part of Nevada has been considered and will be further addressed during the development of the Construction, Operations, and Maintenance Plan (refer to page 1-34 of this document).

S The BLM was unaware of this transition zone until receipt of your letter. Kim Otero contacted Alvin McLean at the Desert Institute. He had no recollection of the "unusual succulent transition zone" referred to in this comment. Surveys for sensitive plants will be conducted along the right-of-way and access roads of the selected route (refer to the Construction, Operation, and Maintenance Plan on page 1-34 of this document).

T The areas labeled as playa on Link 267 between miles 15 and 20 (Cutoff Route) have been incorrectly identified. The correct landcover is sage scrub. The 230kV Corridor Route is the environmentally preferred route with consideration of cumulative effects (refer to Chapter 3 of this document).

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COMMENTS

T | rescind the designation of this corridor as the environmentally preferred route?

U | QUESTION 7F) Link 266 appears to go out of its way to take dead aim on the Red Hills and run along the entire length of the top of this topographic feature. There is no road on this ridge top and the slopes are significant. Construction costs must be higher in this constrained environment unless grievous damage is to be done to the ridge top. Erosion will be generally more severe for both the short and long term than the short stretches indicated on the Earth Resources Map #3. Why does the route go the length of these hills instead of at their base? If this route is chosen for construction, will the actual alignment be changed to avoid the ridge of the Red Hills?

V | QUESTION 7G) The Visual Resources Map #3 and #4 depict the entire Cut-off route as having minimal visual impact over its entire length except the short link 262. Nothing could be farther from the truth. This entire route is in fact noteworthy for the absence of visual impacts due to human activity. We believe that the Ely District now classifies much of this area ("Mike Springs Pass") as Visual Resource Class II. Except where the corridor crosses the relatively low voltage rural electrical distribution lines at the road on the west side of North Spring Valley, at Tippitt Pass, and at the road on the west side of Snake Valley, there is essentially nothing man-made higher or more intrusive than an occasional fence over a corridor distance of about 75 miles (links 263, 265, 266, 267, 268)! No houses, barns, silos, industry, smokestacks, chimneys, or poles. Even for rural Nevada, this area is remote! The introduction of a 500kV powerline with four-legged lattice towers at least 130 feet tall, especially running the Red Hills ridgeline and "Mike Springs Pass", would be a massive change in the visual character not only of the corridor, but the entire area. The viewsheds of the Mt. Moriah Wilderness Area, the Blue Mass Scenic Area and the Gandy Area of Critical Environmental Concern are all severely adversely impacted by this corridor. Why is this massive visual impact ignored in the DEIS? Will the FEIS and ROD take this massive visual impact into account and upgrade the visual impact from minimal to high. If not, why not?

W | QUESTION 7H) The National Park Service is the only serious "Agency" opponent of the 230kV Corridor route. They are

RESPONSES

U | Link 266 does not traverse the ridge of the Red Hills.

V | Neither the Direct Route or Cutoff Route corridors would cross VRM Class II areas in the Ely District. According to the Schell Resource Area, Ely District, most of the area is Class III and Class IV. These routes would pass near VRM Class II areas around the Blue Mass Scenic Area, the Gandy ACEC, and Marble Canyon WSA. Both routes would pass near the Mt. Moriah Wilderness, which is VRM Class I. All other areas that would be crossed are Class III and Class IV.

Visual impacts to the Mt. Moriah Wilderness, the Blue Mass Scenic Area, the Gandy ACEC and the Marble Canyon WSA were evaluated in the SWIP DEIS/DPA (refer to Volume III - Human Environment Technical Report). Because views from dispersed recreation can occur from virtually anywhere within their boundaries, the effects of the SWIP alternative routes were characterized in somewhat general terms (refer to page 3-26 of this document).

Mitigation has been recommended to minimize the potential adverse effects of alternative routes on views from dispersed recreation viewpoints. Recommended mitigation measures consist of using non-specular (non-reflective) conductors and dulled structures in sensitive areas where the visual contrast would be strong.

W | Public Law 102-328, enacted August 3, 1992, designates both the California National Historic Trail and the Pony Express National Historic Trail as components of the National Trail System. This designation did not exist at the time the SWIP DEIS/DPA was released, although both routes were considered and all crossings were identified. Both trails would be crossed by the SWIP in northern Nevada.

It is incorrect to say that the recent act, amending the National Trail System Act, "puts the trail under their (NPS) care and safekeeping." Similarly, the new law does not mandate NPS acquisition or corridor management. While the NPS serves in an advisory capacity and conducts studies relative to national trails, the National Trail System Act states, in Section 7(a)(1)(A), that: "Nothing contained in this Act shall be deemed to transfer among Federal agencies any management responsibilities established under any other law for federally administered lands which are components of the National

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COMMENTS

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W [apparently willing to sacrifice other major ecological values to preserve their own viewshed at Great Basin National Park. However, they may wish to re-think their support for the Cut-off route. A recent law has been enacted which puts the Pony Express Trail under their care and safekeeping. The Law mandates that NPS acquire and/or manage the corridor of the Pony Express Trail to preserve its character and integrity. Cut-off link 265, the north end of link 266 in the vicinity of Tippitt Pass, and probably link 262 would have major visual intrusions and totally change the historically accurate ambiance of this 20 mile segment of the Trail. Given this new mandate, will the NPS now oppose the intrusion of the Cut-off into the viewshed and ambiance of the Pony Express Trail?

X [QUESTION 7I) Given the genuine and valid concern of NPS for the viewshed of Great Basin National Park, is not the incremental impact of a third transmission line north of the Park in the established 230kV Corridor less of a total impact than almost 80 miles of new transmission line in a pristine area where none currently exists?

Y [QUESTION 7J) If the Park indeed must place its information kiosks within the immediate viewshed of the new transmission line, why not make the object lesson that the viewer, 90% of whom come from major metropolitan areas, have only themselves to blame for this visual intrusion, since it is to support their demand for more electricity that the line was built?

Z [QUESTION 7K) The LADWP insists that it will only consider the most visually intrusive four-legged lattice towers for the Cross-tie because this is the only style of tower in which they purport to have confidence, despite contrary experience elsewhere in the country. Would not the NPS have greater ability to insist that less intrusive towers be used in areas impacting their viewshed?

AA [QUESTION 7L) LADWP has indicated that they will only consider four-legged lattice towers on the Cross-tie route. These are the most visually intrusive towers possible. If the Cut-off alternative is selected for implementation, will the visual intrusion be mitigated over approximately 80 miles of corridor by the use of less visually intrusive guyed tower designs? Will both towers and wires be covered with a non-reflective coating to reduce visual impact? If not, why not? Will the utility be permitted to dictate its preference to

Trail System." The federal lands involved at the crossings of these two trail components and the SWIP are currently administered by the BLM. This management does not change as a result of P.L. 102-328. The above notwithstanding, the National Park Service agrees that these two trails are significant cultural resources which merit protection. The BLM also believes that the recent designation of the California Trail and Pony Express routes as National Historic Trails heightens even further the level of protection that should be afforded.

X The impact comparison between these two routes is discussed on pages 2-53 through 2-54 and summarized in Table 2-4 of the SWIP DEIS/DPA (also refer to Table 1-2 in this document). There is also additional documentation of these impacts in this document in Chapter 3.

Y Your comment is noted and will be considered in the BLM's decision process.

Z This has been done. Corten-steel H-frame towers will be used as mitigation at the proposed road crossings which lead to Great Basin National Park. The H-frame poles may be used elsewhere as necessary to mitigate visual impacts. Refer to Table 4-2 #5 in the SWIP DEIS/DPA.

AA The guyed tower is not being considered as visual mitigation for the Ely to Delta segment. Yes, there are locations along all alternative routes, including the Cutoff Route, where non-specular conductor and dulled towers are specified to mitigate visual impacts. The utilities have already negotiated the mitigation measures with the BLM and have agreed to all of the mitigation measures that were recommended in the SWIP DEIS/DPA.

From the Selectively Committed Mitigation Measures listed in Table 4-2 of the SWIP DEIS/DPA, the LADWP has committed to the use of measure numbers 5, 7, and 10 in conjunction with the self-supporting (four-legged) steel-lattice towers on the Ely to Delta segment routes. Steel-lattice towers tend to be less visually evident in distant views than steel pole towers. The LADWP has strong internal policy reasons for not using the guyed tower design. The LADWP has developed current designs for transmission line towers based on its many years of experience in construction and maintaining high voltage transmission lines. The LADWP's experience includes the construction of 1838 guyed towers in 1969 and maintaining them for 23 years.

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COMMENTS

AA

the BLM? How can less visually intrusive guyed tower designs be acceptable to IPC for the SWIP corridor but be unacceptable designs for LADWP for the Cross-tie covering essentially similar terrane?

BB

QUESTION 7M) On July 30, 1991, at about 9:55 P.M. an F-16 flying out of Hill AFB crashed in "Mike Springs Pass" while on a low level training mission. The plane dug a furrow in the ground about three-quarters of a mile long a few miles south of Mike Springs, essentially along the proposed centerline of the Cut-off corridor. Hundreds of missions are flown through this pass every year. The planes are often so low (several hundred feet or less) that they are blocked from view by the slightest clump of bushes or rise of ground. The planes are often banking sharply to stay within the envelope of the UTTR as defined by the navigation beacon on Kern Mtn. A picket fence of high tension lines and 130 foot high pylons is about the last things these pilots need to distract them!!! Assuming that the Air Force will continue to train for low level missions over this area, will the FEIS and ROD recognize the extreme danger to human life that this segment of corridor presents to military pilots? The 230kV Corridor also crosses military air space, but not so near the UTTR itself, and there are existing towers and lines in this right of way. Why not keep the hazard concentrated where it currently exists?

CC

QUESTION 7N) The Cultural Resources Map #3 shows major un-evaluated areas along the Cut-off route. The DEIS makes the implication that statistically, these areas will have about the same importance as most of the rest of eastern Nevada. We believe that this may not be so. The Kern Mtns. have an unusual, more east-westerly trend than the typical basin and range mountains. This gives rise to a very high percentage of northern and especially southern facing micro environments well suited for large and small game, pinion nuts, and edible grasses such as Great Basin Rye. The Kerns are also unusually well watered with numerous well dispersed springs. There is only about 20 miles between these mountains and the North Spring Valley marshes, now often dry playas due to use of water for irrigation. In former times these marshes would have been a major food and fiber resource locality. Archaeological investigations, as noted in the DEIS, indicate that the general area has been occupied for about 12,000 years. Unlike most subsistence hunter/gatherers, the local inhabitants would only require

RESPONSES

When compared to free standing towers, the LADWP feels that guyed towers have the following advantages and disadvantages:

Advantages

- lower initial costs
- less visual impact

Disadvantages

- not as capable to handle broken wire conditions, resulting in increased probability of tower failure and, in particular, the cascading failure of many towers at one time
- vandalism/sabotage leading to tower failure easier to accomplish by cutting guy wires
- corrosive action on guy anchors can lead to releasing the guy wires and tower failures far easier than the same corrosive action on footings of a free standing tower
- anchors and guy wires easily damaged by vehicle traffic with increased chances of liability lawsuits resulting from public use of access roads.
- guy wires require frequent monitoring for proper tensions
- costs incurred for additional line outages required for maintenance
- transmission line reliability reduced

The LADWP is willing to incur the additional initial costs because they consider the disadvantages of a guyed tower to be a major concern.

Except for areas where the United States Air Force requires the structures to be more visually apparent, the mitigation measure to use dulled towers and non-specular conductor will be implemented in the recommended locations.

It is the LADWP's policy to work with the land management agencies to develop mitigation measures for specific environmental impacts that occur along the selected route. The environmental process does not allow a utility to dictate its preference.

BB

All of the alternative Ely to Delta segment routes would cross through the Utah Testing and Training Range (UTTR) operated by Hill Air Force Base. The Direct Route is the only route that would cross through a significant

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COMMENTS

RESPONSES

CC [an annual trek of 40 miles rather than the more usual several hundred miles to get all necessary resources. Even obsidian, chert, and hornfels for making implements is relatively close at hand. The area has always been on or near significant cultural boundaries for as long as these can be differentiated. This compression of activity into such a relatively small area should significantly increase the density and scientific importance of pre-historic and ethno-historic sites exactly along the proposed corridor. Will the FEIS and ROD recognize the likelihood of a unique area of cultural resource concern along the Cut-off route?

ISSUE 8) The Las Vegas District of the BLM is currently involved in the updating/renewal of its existing RMP. Our support for the southern portion of SWIP in Clark County is predicated on SWIP remaining in utility corridors as currently defined, especially outside but adjacent to the Delamar Mts. WSA, Coyote Valley, Aerojet Corridor, Arrow Canyon WSA, and other WSA's west of US Highway 93.

DD [QUESTION 8) Will the SWIP transmission facility be confined to existing utility corridors, as currently defined, within Clark County? Despite industry preferences, will stacking of multiple lines on a single set of towers be utilized before expanding the corridor into WSA's, ISA's, and ACEC's? If not, why not?

ISSUE 9) There is currently a plethora of utility corridors, in various states of designation and approval and utilization in and around Las Vegas. Not even the Nevada State BLM can definitively state what is authorized to be where and when.

EE [QUESTION 9) Will there be a cumulative Environmental Impact Study of utility corridors of all types within Clark County for ALL utility users including power transmission, water transfers, communications, etc. especially as to how they relate to Sunrise Mountain Instant Study Area, Rainbow Gardens Area of Environmental Concern, and private property, WSA's, ISA's, and ACEC's generally, before ANY additional corridor designations or modifications or utility construction takes place?

portion of the R-6405 Restricted Area. The Cutoff Route also passes through a corner of this restricted area. The BLM has recognized the danger to human life. The impacts to the UTTR are found in the land use section of the SWIP DEIS/DPA and are documented in the Map Volume accompanying the DEIS/DPA and the technical reports (refer to Appendix H in the DEIS/DPA for the locations where the technical reports can be reviewed). The BLM will consider your comments when it makes its decision.

CC This is an interesting hypothesis that could be investigated in the course of intensive surveys and any data recovery studies if the Cutoff Route were selected for construction.

DD There are no designated utility corridors in Clark County except through the Aerojet lands, the Apex area, and across the Moapa River Indian Reservation. The SWIP, if approved, will pass through the Aerojet corridor. Since the SWIP's southern terminus is Dry Lake it would not pass through the Apex corridor. The current Resource Management Plan (RMP) process for the Stateline Resource Area will designate utility corridors. However, no decision has yet been made on the RMP. The utilities have agreed to double circuit towers in the Pahranaagat Wash area because of the confinement created by WSAs in this area.

It is not possible to answer at this time how the utility corridor south of Dry Lake will be configured. Please refer to pages 2-52 and 4-81 in the SWIP DEIS/DPA and page 3-14 of this document for a discussion of the Marketplace-Allen Transmission Project proposed by the Nevada Power Company. Rights-of-way cannot be authorized in WSAs or ISAs, since the Federal Land Policy and Management Act of 1976 and the BLM's Interim Management Policy disallow them. A right-of-way can be authorized in an ACEC.

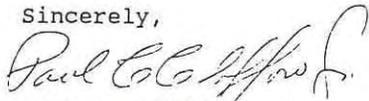
The preference of utilities not to stack multiple lines on a single set of towers is based on reliability (e.g., if a failure occurs all the multiple circuits would typically malfunction). However, typically if a single circuit line fails, only that line is affected.

EE Except for establishing corridors in the Stateline Resource Management Plan, a cumulative EIS of utility corridors within Clark County is not

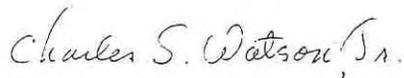
LETTER #B-10
COMMENTS

Thank you for considering our concerns. Please send a copy of your response to the above questions and concerns to each of us. Please keep each of us informed of any further developments. If you desire any further information or clarification, please feel free to call or write at the phone numbers and addresses below.

Sincerely,



Paul C. Clifford, Jr.
National Field Representative
Nevada Outdoor Recreation Assoc.
2955 Berkshire
Cleveland Heights, Ohio 44118
Phone: (216) 231-4600



Charles S. Watson, Jr.
Director & Co-founder
Nevada Outdoor Recreation Assoc.
P.O. Box 1245
Carson City, Nevada 89702
Phone: (702) 883-1169

cc: Mr. Billy Templeton
Nevada State BLM Director

Mr. Kenneth Walker
Ely District BLM Manager

RESPONSES

planned. The RMP will analyze the impacts of the location of the corridor, not the specific facilities within that corridor. In accordance with NEPA, each EIS for a proposed facility will analyze the cumulative impacts.

LETTER #B-11
COMMENTS

RESPONSES



OREGON - CALIFORNIA TRAILS ASSOCIATION

OFFICE OF NATIONAL HISTORIC TRAILS PRESERVATION
950 OLD TRACE ROAD • PALO ALTO, CALIFORNIA 94306 • (415) 941-0815

September 1, 1992

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

Dear Mr. Simonson:

RE: COMMENTS ON SOUTHWEST INTERTIE PROJECT DEIS/DPA

I am in receipt of the June, 1992 Southwest Intertie Project DEIS/DPA, and I wish to place the following comments on the official record on behalf of the Oregon-California Trails Association.

Our primary concern in the matter is the effect which the proposed Intertie routing would have on the California Trail corridor in north-eastern Nevada. As you know, this historic overland emigrant route comes into Nevada at the very northeast corner of the state, proceeds up Goose Creek, crosses over to and down the Rock Spring Creek drainage, then up the Thousand Springs Creek drainage to Thousand Springs, over the Windemere Hills via Brush Creek, and then splits--one branch going through Bishop Creek Canyon and the other down the Town Creek drainage to the present town of Wells, Nevada, where it swings southwestward down the Humboldt River.

All of the proposed routes would at some point cross over and have an impact upon the California Trail. Our concern is see to it that this impact is as little as possible, and my comments are framed with this goal in mind. This concern has to do with physical impacts and, perhaps even more importantly, with the inevitable visual impacts upon this most important historic trail corridor.

It should be noted before presenting our comments on the specific routes proposed for the Intertie that there are several new developments which should affect thinking on the routing of the Intertie. The first is that the present road from Highway 93 over to Thousand Springs Ranch, down Thousand Springs Valley, up Rock Springs Creek Valley and back over to Highway 93 to a point just south of

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COMMENTS

Jackpot has now been officially designated and established as a BLM Scenic Byway. There are proposals to extend this scenic byway on to Goose Creek and over to City of Rocks National Reserve. In addition, the entire California Trail complex, including this most important section of the California Trail through northeast Nevada has now been placed under the provisions of the National Trails Act by act of Congress. This legislation was passed by Congress and signed by the President only a few weeks ago. This action gives the California Trail significant additional historic standing and protection.

The portion of historic trail which would be impacted by the Intertie is in Panel 2, and the following comments refer to that panel of maps in the DEIS.

Both the Environmentally Preferred Route (Routes A,D,E) and the Utility and Agency Preferred Route (G) would cross Thousand Springs Valley and would do extreme damage to the visual integrity of the historic trail corridor. Thousand Springs itself was one of the most important stops for emigrants traveling the overland trail. Almost without exception, every emigrant wagon party stopped and camped at the hot springs, and a power line through this broad, open valley would be a most unwelcome and disturbing intrusion.

A Alternative Routes B,C,F would be somewhat of an improvement over the Environmentally Preferred and Utility and Agency Preferred Routes in that the line would cross the trail in a less open landscape, but the route would then parallel the trail within sight for many miles to the south of the crossing. This would also be a most unwelcome intrusion within the viewshed of the trail corridor.

Of all the Alternatives, Route D, would be perhaps the least visually-intrusive because it would be basically following the Highway 93 alignment in which there are already the highway, the old railroad bed, and an existing powerline. Route D would cross both branches of the trail, however, and these crossings would be in wide-open places.

B OCTA would, of course, strongly prefer that the proposed Intertie be located further to the east and out of the historic viewshed of the California Trail entirely--located in such a way that there would be only a right-angle crossing of the trail to ensure the least visual impact. If Routes B,C,F were moved eastward in the lower Thousand Springs drainage and then connected with the indicated Rocky Point-Six Mile-Spruce Mountain alignment, that would certainly answer our objections to the greatest degree possible.

C Barring such an eventuality, of all the alternative routings cited, in the DEIS, the unnamed alignment which is shown to the west of Route D would be the one which would answer most of our objections. There is an existing powerline already in place along this alignment, and

RESPONSES

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

B Your preference for the connection to the Rocky Point-Six Mile-Spruce Mountain alignment is not possible. This is the path for the microwave signals from one mountain top location to another, not a potential transmission line route. The microwave path would establish a communication link for operation of the transmission line and substations.

C All the routes would cross the California Trail, either at a right angle or parallel to it, for several miles. Links 150 and 151 were selected as the least disturbing, both to highway travelers and persons experiencing the California Trail in the Winecup area. The visual disturbances associated with the ranching operations at the Winecup Ranch would tend to de-sensitize persons on the trail to the presence of the power line. Your preference is, the BLM believes, for Link 170 through Wells. This link was analyzed and was found least preferable environmentally (refer to the discussion on Link 170 in Appendix D in the Appendices for the SWIP DEIS/DPA). However, your preference for Link 170 is noted and will be considered in the BLM's decision process.

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C our position is that any additional powerline should simply be placed in this already existing corridor. We can see no reason to destroy the existing visual integrity of the California Trail corridor further when the Intertie could be routed right along a powerline which is in place and which already constitutes a major visual intrusion.

Our recommendation is that this unnamed alignment be reconsidered and chosen as the Southwest Intertie alignment if it is not possible to route the alignment out of sight of the trail corridor entirely as recommended above.

We appreciate this opportunity to comment on the Southwest Intertie Project DEIS/DPA. We hope that our comments will have some bearing on a decision which will have a major effect on the preservation of a most vital part of our American heritage.

Sincerely,



Thomas H. Hunt
National Trails Preservation
Officer

LETTER #B-12
COMMENTS



SIERRA CLUB

Toiyabe Chapter — Nevada and Eastern California
P.O. Box 8096, Reno, Nevada 89507

RESPONSES

- A The SWIP is not dependent on the electrical resources of any specific generation source. A major part of its purpose and need is to provide for regional transfers of bulk power (e.g., seasonal exchanges). The SWIP DEIS/DPA considered an adequate range of alternatives to the electrical connection proposed by the SWIP. Please refer to pages 2-1 through 2-10 of the SWIP DEIS/DPA for a discussion of alternatives considered but eliminated.

September 12, 1992

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

Dear Mr. Simonson:

The Toiyabe Chapter of the Sierra Club has reviewed the draft Environmental Impact Statement (EIS) on the proposed Southwest Intertie Project (SWIP). A brief oral statement was made at the hearing in Las Vegas on August 20, 1992 by Dave Brickey, Conservation Chair, Southern Nevada Group. Our comments today are in more detail and represent concerns that we have with the entire project. Our comments focus on the EIS and analysis of alternatives, proposed mitigation for environmental impacts, and relationship of this EIS to other EISs. Detailed comments are provided, whenever possible, on the proposed routes for the line.

Purpose and Need

A [The Toiyabe Chapter appreciates the arguments made in the EIS that transmission lines interlinking major power facilities with major load centers can lead to more efficient, reliable operation of power plants and power systems. An argument is made in the EIS that excess capacities in the Southwest and Northwest at certain times of the year can be conveyed to areas in need through the construction of the SWIP and that the need for additional power plants may

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COMMENTS

RESPONSES

A be reduced. Most of the EIS is then devoted to an analysis of the impacts of the SWIP on the environment with several possible routes considered. Relatively little space is devoted to an analysis of alternatives to the project as a whole.

B The Toiyabe Chapter believes insufficient data has been presented in the EIS to support the arguments for the SWIP. No data are presented on the costs of building and operating the transmission line, and no data are presented on the amount of power that will be wheeled on the SWIP at various times of the year. Thus, it is impossible to evaluate whether the proposed SWIP is, in fact, the least-cost-alternative to providing reliable electrical energy to the areas it is supposed to serve.

C The service area for the SWIP has not been sufficiently identified in the EIS. As presented, the backbone of the line runs from Midpoint, Idaho to a dry lake at Apex, Nevada. These nodes, by themselves, are not major load centers. If much of the electrical power is intended for Las Vegas, Los Angeles, Portland, Boise, Seattle, and Salt Lake City at certain times of the year, then other transmission lines will be required to convey the power from Midpoint Idaho and Apex, Nevada. Unfortunately, the environmental impacts of conveying power from Apex, Nevada to Los Angeles are considered by the Club to be substantial because the likely route for the necessary transmission lines will be through the Bureau of Land Management's (BLM) Sunrise Mountain Wilderness Study Area. (This area is being recommended by the BLM as an Area of Critical Environmental Concern, in part, because of the world-class geology.) Thus, if the power conveyed by SWIP is needed to increase reliability and efficiency of the power distribution system in the West, the EIS for SWIP needs to view the proposed project as part of a larger system. The relationship of SWIP to the larger system has not been sufficiently developed in the EIS to consider the cumulative costs and impacts of this proposed project.

D Utilities that might be served by the SWIP are covered by state regulatory agencies. Virtually all of the utilities have various demand side management programs with various goals and timetables. Little discussion has been provided in the EIS on the status of the applications to the state regulatory agencies for approval to build the SWIP and to recover costs. Little discussion has been provided of the interrelationship between the various demand side management programs and the projected requirement for new power plants that will feed into the SWIP.

E Increasing pressure is developing on a world-wide scale to limit emissions of green house gases to reduce the chances of significant global warming. A target is CO₂ emissions from fossil fueled power plants. Increasing emphasis is being devoted to energy efficiency. If energy

B Please refer to the expanded Purpose and Need section in Chapter 3 of this document (specifically the section about least-cost planning of page 3-4) and the Purpose and Need statement in the SWIP DEIS/DPA.

C There is no service area per se for the SWIP. Please refer to the Purpose and Need for the SWIP in the SWIP DEIS/DPA and the expanded discussion in Chapter 3 of this document. Also refer to discussions of the proposed Marketplace-Allen Transmission Project (MAT) on pages 1-11, 2-52, and 4-81 of the SWIP DEIS/DPA and page 3-14 of this document.

D 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 will 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 load diversity within the region. Transmission will 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 (i.e., generation) can be reduced by using transmission. Then, when new regional generating resources are needed, transmission, such as the SWIP, will make more resource options available, and should help minimize costs and environmental impacts.

Refer to the expanded discussion of purpose and need in Chapter 3 of this document.

E As described in response to previous comments, the SWIP is intended to operate as an integral part of least-cost resource strategies of the participating utilities. The anticipated need for the SWIP, measured by statements of interest in participation in the project, exists in the current regulatory environment which recognizes the resource value of conservation and

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efficiency becomes more widely implemented on a global, national, and regional scale, then the future needs for new, costly power projects, such as the SWIP, may become significantly reduced. Amory Lovins of the Rocky Mountain Institute has made these arguments on a number of occasions. The discussion in the SWIP EIS on the impact of demand side management in all of areas served by the SWIP is incomplete and needs to be dramatically expanded from the simple discussion of Idaho Power Company's demand-side management program.

F If the primary purpose of SWIP were to increase reliability of the power system in the West and increase the efficiency at which energy from existing power plants is used, why is the SWIP an AC line rather than a DC line to exchange energy between major load and power producing centers? What significant source of energy, or significant load, exists at Thousand Springs, Nevada? What significant source of energy, or significant load, exists at Ely, Nevada? The answer to the last two questions is presently "none"; therefore, the arguments being made in the EIS that DC power lines are only cost-effective when long distances are considered would appear to lend weight to a DC line being used to wheel power from the powerplant in Utah to the major substations at Apex, Nevada and Midpoint, Idaho. The inference drawn from the arguments made in the EIS for an AC line and substations at Thousand Springs, Ely, and Apex is that major proposed powerplants at these sites are still being seriously contemplated. If not, the type of DC transmission line depicted in Figure 1-1 from Utah to Los Angeles would be proposed for the SWIP to efficiently convey power between major power facilities and loads. If the project proponents are seriously considering future power plants which would not be possible without SWIP, then the EIS for SWIP should consider the cumulative, future impacts of this major transmission line with additional coal-fired power plants in Nevada. Can the SWIP be justified without these power plants? Can a DC powerline be rejected if no major power facilities will be constructed at the proposed substations for the proposed AC line?

The No Action Alternative

G The rejection of the no action alternative in the EIS, and short summary of arguments presented, leads the Club to conclude that the draft EIS is inadequate. The stated objective that the SWIP would "increase the reliability and capacity of the transmission system in the western U.S." (p. 2, EIS) is presented without supporting data to show that the historical use and present operation of today's grid has been unreliable and prone to catastrophic failures and power interruption. "There is a gap in this system through the inland West (p. 1, EIS)"; yet, the arguments presented for plugging this hole are not well supported with facts or by the growing realization within the power industry that there are alternatives to transmission lines that can lead to lower costs, more

RESPONSES

encourages the development of all cost effective conservation programs. The SWIP would complement rather than compete with conservation in least-cost planning to meet future load requirements of the region.

Refer to Chapter 3 of this document for the expanded discussion of purpose and need.

Potential interconnections have been identified in the Wells and Ely areas which could provide significant load or interconnection service to the local utilities. The SWIP requires series compensation sites located at quarter points along the line for voltage support. Due to the nature of series compensation stations, these sites would also be a good location for interconnections that may be desired by other utilities. The SWIP is not dependent upon any specific power plant integration.

A DC transmission alternative for transmitting 1200 MW of power between from Midpoint to the Dry Lake Area would cost about \$488 million (\$200 million for line and \$144 million for each line terminal) compared to \$356 million for the proposed AC project. As pointed out in the SWIP DEIS/DPA, additional load taps are not nearly as feasible with a DC alternative. The cost of each site is an order of magnitude greater (\$100+ million v. \$10 million) and are not included in the \$488 million estimate for the basic 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 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 and +/- 400kV. A 1200 MW flow at +/- 400kV would have generated 8.6 percent loss. In the 1980s, the Pacific DC Line was uprated to +/- 500kV and is now capable of 3100 MW. For a 1200 MW flow on the current DC system, the losses are currently about 5.7 percent compared to 6 percent for the SWIP.

G The BLM believes that an adequate range of alternatives to the SWIP was evaluated and that the SWIP DEIS/DPA discussion of the no-action alternative is adequate. The no-action alternative would result in other actions being taken, which is discussed in the SWIP DEIS/DPA on pages 2-10 and 2-11.

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G efficient use of existing power sources, and lead to reduced environmental impacts. A small sampling of statements from a small number of documents that have been made available to the Sierra Club leads the Club to conclude that the BLM has not done their homework in evaluating alternatives to the proposed SWIP.

H "According to a 1990 report by EPRI [The Electric Power Research Institute], it is technically feasible to save from 24 to 44 percent of U.S. electricity by 2000 - some of it rather expensively - in addition to the 9 percent already included in utility forecasts. . . . Rocky Mountain Institute estimates long-term potential to save about 75 percent of electricity at an average cost of .6 cent per kilowatt-hour - several times lower than just the cost of fuel for a coal or nuclear plant."¹ This article and supporting documentation lead the Club to question the supposition in the EIS that the proposed powerline is the least-cost option (environmentally and economically).

I The stated need for the SWIP to "furnish access to the economy energy market" (p. 2, EIS) does not appear to be supported by the present grid of powerlines in the west. Power is presently being wheeled throughout the West even though a "hole" presently exists in Nevada according to project proponents. Power in the southern western states is presently being shared by powerlines that extend at least as far from Nevada as New Mexico and central Utah. Power in the northwest is presently being shared with southern California through a large array of existing power lines and across the Cascade Range through another major set of existing powerlines. North-south powerlines in Utah and Colorado interconnect major power plants with transmission line substations and population centers.

J Excerpts from the testimony of Amory Lovins of the Rocky Mountain Institute on a proposed powerline through a sensitive area of New Mexico (the OLE project) is presented because Mr. Lovins address issues such as: "gaps" in transmission line networks, demand side management as an alternative to transmission lines, and least-cost analyses of energy production and distribution systems. These issues are relevant to SWIP; however, the Club finds the discussion

¹ "Efficient Use of Electricity", A.P. Fickett, C.W. Gellings, & A. B. Lovins, Scientific American, September 1990.

The no-action alternative could lead to construction of new generation resources in various parts of the West because existing electrical resources would not be able to utilize the SWIP for regional exchanges. Environmental impacts associated with generation (e.g., air quality) and transmission (e.g., similar types of impacts to the SWIP) would occur if generation is constructed.

A second possible result of the no-action is that electrical rates in various parts of the West may be impacted if the SWIP is not constructed and more expensive generation options are exercised. Finally, the stability and reliability of the electrical system in the West would not be enhanced without the SWIP.

The BLM believes that the SWIP is a desirable action for the utility industry to most efficiently utilize electrical conservation and availability and minimize environmental impacts in the western United States.

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

The SWIP DEIS/DPA Purpose and Need Statement does not contend that the existing electrical system in the western U.S. is unreliable or prone to catastrophic failures. Reliability of the existing system is adequate. The SWIP will provide additional capacity for seasonal exchanges and other commercial transactions. The seasonal load and resource diversity between electric systems in the North versus those in the South may allow power exchange contracts to replace or defer new resource construction. The additional capacity provided by the SWIP would allow utilities to take advantage of this regional diversity and would promote the efficient utilization of existing power resources. The purpose of the Western System Coordinating Council is to promote reliability of the electrical system in the western U.S. through efficient design and operation as well as to provide mechanisms to insure the future system continues to be reliable and efficient. Reliability is not the sole purpose of the SWIP but is a direct benefit to the western electrical system.

The SWIP is intended to operate as an integral part of the least-cost resource strategies of the participating utilities. The public and regulatory agencies have mandated that the region's utilities recognize the resource value of conservation. Regional utilities have expressed interest in participating in the

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of these issues in the EIS for SWIP to be inadequate in that none of the analyses and facts presented by Mr. Lovins are presented in the EIS in the discussion of the "no-action" alternative.

. . . utilities in the Puget Sound area, for example, are engaged in a Bonneville-led collaborative process . . . to find cheaper alternatives to a third transmission line across the Cascades. Many such alternatives, chiefly in end-use efficiency, have been emerging. Resolving the "Puget doughnut" transmission bottleneck is the main motivation for such efforts as Bonneville's recent reexamination, and major enlargement, of industrial electricity-saving potential.

Pacific Gas and Electric Company (PG&E) has been evaluating similar, though smaller-scale, opportunities to displace transmission expansions, as have New England Electric System, Central Maine Power, and probably other utilities. The Wisconsin Public Service Commission's least-cost planning process rejected a major power line (WISINTOBA) after [Amory Lovins] showed that demand-size alternatives would cost less and provide other benefits.

Even at the distribution level, PG&E has pioneered, and many other utilities are becoming very interested in . . . "precision-guided programs.: PG&E produces loadshape graphs for heavily loaded substations and feeders, showing the contribution to their peak demand from each major end-use - and then targets [demand-side-management (DSM) programs] directly on those end-uses The utility designs its DSM programs like a rifle instead of a shotgun, and so specifically addresses the opportunities that will defer distribution investments often costing upwards of \$300/kW. This saving along more than pays for the DSM programs, so the accompanying benefits in generation, fuel savings, and avoided pollution are free.

Many utilities also count grid benefits from DSM programs. For example, a 1984 study by Houston Lighting & Power Co.'s staff noted that the 60-108 MW, initially achieved by rebates for more efficient household air-conditioners had more benefits than displacing generating capacity and purchasing power: "The 40,000 existing-home participants have provided capacity for over 10,000 new residential customers with no additional

RESPONSES

project because they recognize the benefits of the SWIP to their least-cost planning process. Transmission facilities will contribute in several important ways to the region's task of 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 seasonal load diversity within the region. Transmission will 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 (i.e., generation) can be reduced by using transmission. Then, when new regional generating resources are needed, transmission, such as the SWIP, will make more resource options available, and should help minimize costs and environmental impacts.

Refer to the expanded discussion of purpose and need in Chapter 3 of this document.

H Refer to Response E above.

I Please refer to discussion of the existing system on page 1-3 of the SWIP DEIS/DPA.

J The BLM agrees that non-cost effective transmission projects should not be built. The utility partners in the SWIP project are expected to include only utilities which, having considered all options, have found the transmission capacity provided by the SWIP to be part of a cost effective strategy to acquire the new resources needed to serve load growth.

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J demand on our system." "Capacity" includes grid capacity: the study cited, for example, "reduced transformer loads which result in extended transformer life" and hence "more reliable service" spilling over to 200,000 additional customers.²

Compliance with NEPA

² "Direct Testimony of Amory Lovins," New Mexico Public Service Commission, L Case #2382 (OLE powerline)

Relationship to other EISs

K The National Environmental Policy Act allows for the tiering of EISs on interrelated, complex, long-term projects. The EIS for the SWIP was required because the application for the right-of-way did not fall within the normal planning process of the BLM in developing their Resource Management Plans (RMPs) and EISs for the BLM lands. Regrettably, we believe the SWIP EIS has not sufficiently referenced other applicable and relevant EISs to better portray the cumulative effects of this transmission line. What is needed is a regional, programmatic EIS for power lines and power facilities in the West rather than the individual EISs that are being prepared for powerplants and power lines. The RMP EIS being developed for the Las Vegas District of the BLM is considering utility corridors - some of which could provide alternative routes for interconnection of the present coal-fired power plants in Utah with major load centers. Since the EIS process for SWIP is separated administratively from the EIS process for the Las Vegas District and other BLM districts and further isolated from the other EISs by a lack of cross-referencing, it is very difficult to analyze the cumulative impacts of the interrelated energy projects to ensure that the least cost, least damaging alternative is chosen. We recommend the BLM consider restructuring their EIS process to allow greater tiering of the pertinent EISs.

L A great concern of the Club is the impact of the SWIP on wilderness study areas (WSAs). The BLM has evaluated a great many WSAs for their uniqueness, scenic qualities, opportunities for solitude and relative nonimpairment by man. Recommendations have been provided for designation of some of the WSAs as wilderness, but Congress has not yet taken the required action. The BLM must, in the interim, manage all the areas to ensure that none of the WSAs are further impaired to the point where Congress is precluded from considering an area as

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K Cumulative effects have been analyzed in the SWIP DEIS/DPA. The BLM agrees that no programmatic EIS has ever evaluated power system needs and corridors for the West. Individual land use plans for the BLM typically do evaluate utility needs and identify utility corridors. The efforts to establish these corridors are usually based on projected needs by regional utilities. For example, the Western Regional Corridor Study by the Western Utility Group is now being updated to aid both utilities and agencies in planning and establishing corridors.

None of the centerline alternatives would cross wilderness study areas (WSAs), wilderness areas, or semi-primitive areas. The Wilderness Act of 1964, and subsequent legal decisions, led to the BLM Handbook, H-8560-1, Management of Designated Wilderness Areas, where Chapter I, Section A.1.b, states that "Wilderness must be viewed in context with other public lands, recognizing that no buffer zones will be created. Construction of high standard roads, recreation facilities or other developments adjacent to a wilderness should consider the effect they will have on the wilderness." It further states that non-wilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area. The Interim Management Policy (IMP) for the BLM does not apply to activities (e.g., transmission lines) outside of the boundaries because the IMP applies only to actions within the WSA.

Since the BLM manages WSAs as potential wilderness areas the impacts to these areas have been analyzed and appropriate mitigation has been recommended to minimize the potential effects of the alternative routes.

The potential effects of the SWIP to WSAs and the status of wilderness recommendations are addressed on page 3-26 of this document. Tables 3-2 and 3-3 list the number of miles of each alternative route near WSAs. The locations of WSAs are indicated on the Land Use maps in the Map Volume accompanying the SWIP DEIS/DPA (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).

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wilderness. The EIS process by the BLM for considering an area as wilderness was completed prior to the proposed location of SWIP near many WSAs. The Sierra Club is concerned that the proposed siting of SWIP may be used in the future to argue against the designation of adjacent WSAs as wilderness.

M

The White Pine Power Project 1985 Record of Decision did not grant rights-of-way. A Final EIS was never released on the Thousand Springs Power Project and a Record of Decision was never issued. The Utah-Nevada Transmission Project does have a right-of-way grant through the Sunrise Mountain ISA although The BLM has not allowed the construction to proceed. Nevada Power Company is considering the Marketplace-Allen Transmission Project, which in theory may limit the number of lines through the Sunrise area. The SWIP will not supersede any of the other decisions for previous projects, although if a right-of-way is granted for the SWIP south of Ely the White Pine Power Project Record of Decision would be amended to follow the same route.

N

The project proponent is capable of supplying all of the necessary information and data for the BLM and the public to adequately evaluate the purpose and need. The BLM and the IPCo have received numerous letters from other utilities that support the IPCo's conclusions about the need for the project. For example, BLM received a letter from Sierra Pacific on January 15, 1993 stating that they will be short of power in the Ely area. The BLM also received a letter from Deseret Generation & Transmission Co-op on January 17, 1993 stating that they are unable to meet their load growth.

The purpose and need statement has been expanded in this document with information supplied by the utility. Please refer to Purpose and Need in Chapter 3 of this document.

L

The draft EIS for SWIP evaluated, to some extent, the impact of SWIP on WSAs. Tables are presented that highlight the number of miles the transmission line comes within varying distances of a number of WSAs. Three-mile and 1/4-mile distances from WSA boundaries are several of the criteria used to list the number of miles a particular route may impact WSAs. The Club finds this type of analysis and presentation of the impacts of the transmission line on WSAs to be unsatisfactory. The Club believes a better approach would be to identify specific WSAs that might be impacted by the SWIP and to highlight in narrative form the type of visual impacts that might be experienced by a person standing within the WSA boundary.

Some WSAs stand a high chance of being designated as wilderness and some do not. The final EIS should highlight those areas being recommended for wilderness by the BLM, or outside parties, and evaluate in some detail the impact of the transmission line on those areas. Better maps in which WSAs are clearly delineated would be useful in evaluating the impacts of various routes on WSAs.

M

A number of EISs have been prepared over the years for major energy projects in the west. EISs were prepared for the Harry Allen power plant, White Pine power plant, Thousand Springs power plant, and for, we have been told, another major interconnecting powerline between the Northwest and the Southwest. We have been told that these EISs carried with them authority for powerline right-of-ways, e.g. through the Rainbow Gardens area outside of Las Vegas. No comprehensive discussion has been provided on whether the SWIP would supersede these previous commitments so that fewer additional powerlines would be provided in the West to interconnect major power projects and load centers.

Qualification of Preparers

Our concern that insufficient analysis has been given to alternatives in the SWIP EIS may be associated with the background of the staff who helped prepare the EIS. Virtually all of the people have backgrounds in natural resource issues and geographical information systems. The Club believes an economist and an energy consultant would be a natural addition to a team that evaluates a project of this scale. More pages were devoted in the EIS to the health and

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N [ecological effects of AC transmission lines than were devoted to an evaluation of demand side management, the economic feasibility of the proposed project, and the no action alternative; this is not surprising because there was, on the team, a consultant on the electromagnetic aspects of powerlines. Had there been an economist and energy consultant, whose mission were to evaluate in more detail the need for the project, the Club expects that there would have been more details provided on the basic need for the project. We recommend the addition of this expertise to the EIS team.

Circulation of Draft to Interested Parties

O [The Club is concerned with the circulation of the EIS to potentially interested parties. Despite formal comments being provided by Dave Brickey of the Southern Nevada Group of the Sierra Club, the Southern Nevada Group did not receive a copy of the draft EIS. The Club wonders whether other potentially affected groups and individuals received a copy of the draft EIS.

Corridor Siting Considerations - Great Basin National Park

P [Our substantive objections dealing with the need for the Proposed Southwest Intertie itself, notwithstanding, we especially object to the crosstie addition, Ely to Delta, to the main intertie proposal. Specifically, 1) the Club finds the argument advanced in the DEIS/DPA for any powerline linkage from eastern Nevada to western Utah to be unconvincing. 2) Further, we are absolutely opposed to the BLM's preferred alternative route selection of Sacramento pass along U.S. 50 immediately north of Great Basin National Park.

1. BLM Must Remove Crosstie From DEIS/DAP

Q [The justification [1-5] for the crosstie between Ely and Delta (hereafter referred to simply as crosstie) is purported to "[increase] the electrical strength and capacity of the system" and "[reduce] the potential for and the severity of the electrical disturbances" The Club believes this crosstie argument is clearly supplemental to the primary purpose of the DEIS/DAP and is, overall, so unsupported and unjustified as a necessary part of the SWIP in the DEIS/DAP that it must be removed entirely as a part of this document.

R [Should the original (and main) Intertie Proposal ever receive approval in some form, then consideration of this large, add-on project could be considered by the agency. The crosstie stands out as an entirely separate proposal and must receive the detailed justification and scrutiny

O For over four years many newsletters have been circulated to keep the public involved in the progress of preparing the SWIP DEIS/DPA. This list grew to over 3,000 during this period. Public workshops were held before the release of the SWIP DEIS/DPA in addition to the many scoping meetings. In nearly every newsletter the public was asked to send back an enclosed comment sheet requesting a copy of the SWIP DEIS/DPA. If comments were returned without having requested a copy of the SWIP DEIS/DPA, none was sent. There were roughly 600 copies of the SWIP DEIS/DPA distributed. Copies were sent to each person requesting a copy (refer to Appendix G of the SWIP DEIS/DPA). Dave Brickey of the Southern Nevada Group of the Sierra Club has been sent a copy of the SWIP DEIS/DPA.

P Please refer to the expanded discussion of Purpose and Need in Chapter 3 of this document. Your comments regarding the selection of the 230kV Corridor Route past Great Basin National Park will be considered during the BLM's decision process. Also refer to page 3-12 of this document for a discussion of cumulative effects.

Q The Ely to Delta segment of the SWIP has been a part of the SWIP from the beginning. The portion from Ely to Dry Lake was added. The reason the Ely to Delta segment was maintained in the SWIP DEIS/DPA document is explained on pages 2-31 and 2-32 of the SWIP DEIS/DPA. The Ely to Delta segment was originally a joint SWIP and UNTP transmission line segment. When the SWIP was amended in June 1990, the IPCo's need for the Ely to Delta segment changed. However, this segment remains an important link to the UNTP and the need for it remains unchanged.

R Refer to the response to comment "Q" above.

The SWIP DEIS/DPA described the purpose and need for each portion of the project (i.e., Midpoint to Dry Lake segment and Ely to Delta segment) in an attempt to clearly describe each segment. The SWIP and the UNTP remain integral in that each would mutually enhance the reliability of the other. Further, separate impact assessments and comparisons of alternatives were conducted for the SWIP DEIS/DPA. Also refer to the expanded discussion of Purpose and Need in Chapter 3 of this document.

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R of its own DEIS/DAP. By making the crosstie merely an appendage of the major 500-mile electrical transmission line, the important issues related to detailed study of need, efficiency, and cost are lost as noise in the context of the larger proposal. The Intertie proposers appear to have successfully "piggy backed" a second major (but smaller) project on top of a large, major project to improve chances that deficiencies in one, the other, or both will be less noticeable and the responding public more likely to focus on just one aspect.

To summarize this point, we believe we are fully justified in requesting of the BLM that the entire crosstie proposal be stricken from the DEIS/DAP and the document reissued considering only the 500 mile intertie proposal as a single, major project. The crosstie must be considered its own major project with a separate DEIS/DAP. (This EIS may be tiered with the EIS for the SWIP.)

2. BLM Preferred Alternative for Crosstie between Ely, Nevada and Delta, Utah Strongly Opposed

The Club strongly opposes the agency preferred alternative in the DEIS/DAP for the crosstie electrical transmission corridor. We do not believe that any additional transmission corridors should be allowed to impact the Great Basin National Park (GBNP). Following are our specific reasons for opposing the preferred alternative for the crosstie.

S a) Park vistas from many points include views of Sacramento pass and even with the best construction techniques, the line will be a major feature on the landscape unlikely to be missed. Alternate entrances, campgrounds, interpretive sites, and highway pull outs will undoubtedly be desirably located at some future time near to this easy access portion of the GBNP, USFS and BLM scenic lands. A powerline, like that proposed, is such a intrusion it will likely have the undesirable effect of reducing or preventing potential and current recreational/interpretive uses of the Sacramento Pass area. The loss of these public benefits were not considered in the BLM decision process.

T b) GBNP has been proposed by many to include lands up to US 50 on the north. In fact, during legislative debate park boundaries in one bill did include all lands of the South Snake Range within the USFS boundary. Park expansion to include this scenic corridor is foreseeable. Approval of this powerline corridor forecloses on many desirable benefits to the public to enhance enjoyment and understanding of the Great Basin by expanding the GBNP itself. The inability of the GBNP to meet future needs were not considered in the BLM decision process.

S All existing and proposed sites within the Great Basin National Park were evaluated for visual impacts, including the proposed interpretive facilities outside of the park. The BLM agrees that there will be visual impacts to some of these sites, although none of the sites within the park would be significantly impacted. The visual impacts of future recreation site developments on BLM-administered lands and national forests were considered. Please refer to Volume III - Human Environment Technical Report for a complete discussion of the visual impact methodology and results (refer to Appendix H in the DEIS/DPA for the locations where the technical reports can be reviewed). Also refer to Sacramento Pass Mitigation Reroute on page 3-39 of this document.

T The 230kV Corridor Route parallels the two existing 230kV transmission lines on their north side and should not further impact park expansion. Your comments will be considered in the BLM's decision process.

U It is speculative to believe that the two existing 230kV lines would not be placed in their present route had Great Basin National Park been in place twenty years ago. It appears, based on the end points to which these lines are connected, that they were routed reasonably. This route is a designated BLM corridor.

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U c) The existing 230kv powerline over Sacramento pass should not be considered as justification for placing one (or more) new powerlines through the area. We believe that the current line could never be built adjacent to the GBNP if it were subject to the NEPA EIS process. The BLM inappropriately depends on the existing line to support its preferred alternative.

V d) While the Club believes that existing powerline corridors should be used when new lines are needed, this general policy assumes that the corridor in use is a reasonable and justifiable one. In the case of the existing 230kv line, we would be strongly in favor of removing this line for the reasons given above regarding the proposed crosstie. The BLM inappropriately fails to consider eventual removal and rerouting of the existing 230kv line over Sacramento pass and restoring the areas full scenic, recreational, and interpretive potential.

W e) Powerline consolidation in other corridors is not considered by the BLM. For example, removal of the 230kv line, included with one of the other (non-Sacramento pass) routes to reduce the overall impact of powerlines on this remote region of clear air and huge vistas. At a minimum, the BLM should consider such alternatives which would decrease the impact of powerlines.

In conclusion, we urge the BLM to select the "no action" alternative regarding the crosstie portion of the DEIS/DAP because it is a major project in its own right being "piggy backed" on an even larger power corridor and the preferred crosstie route has high environmental impacts (actually compounding existing negative impacts) which precludes many future and existing public benefits.

Mitigation Measures

X The Club is interested in knowing whether the corridor for SWIP will be available for use by other utilities. In particular, will the corridor be available for water, gas, and communication lines? If so, will environmental assessments be required for additional activities in the corridor? Powerline access roads, adjacent to WSAs may impact the potential of the WSA for being recommended as wilderness particularly if the access road is used for competitive off-road races. If underground utilities are allowed in the corridor, experience with present corridors in Nevada (e.g., Kern County gas transmission line) indicates that the loss of vegetation and scaring can be dramatic and potentially long lasting. The Club desires answers to these questions.

V The BLM is not aware of routing opportunities through this area which would result in lower environmental impacts. Also, the Cutoff Route would not be an appropriate routing for the 230kV transmission lines. The SWIP regional study evaluated all potential routing opportunities in the region, and all reasonable and feasible routing opportunities are being considered in this EIS process.

W The BLM cannot consider terminating a right-of-way grant and have the existing 230kV transmission lines removed to a different location. This would be considered only after the right-of-way expired or possibly in cases of extreme non-compliance. The earliest expiration date of the right-of-way grant on these lines is the year 2020. Use of the 230kV Corridor Route for the "Crosstie" is in compliance with the BLM policy to consolidate power lines. Section 503 of the Federal Land Policy and Management Act requires, to the extent practical, the utilization of rights-of-way in common.

X Establishing a utility corridor means that other linear features would be consolidated parallel to existing linear features to the degree possible. This would hold true for water, gas, communication, etc. However, an important distinction is that any new project that is proposed must have a right-of-way grant and is subject to compliance with the National Environmental Policy Act.

The BLM will determine which access routes will be closed and restored following construction. The construction for a transmission line would not disturb a broad corridor similar to a pipeline. There is typically continuous construction access between tower sites except where there are sensitive resources (e.g., wetlands, live streams, etc.).

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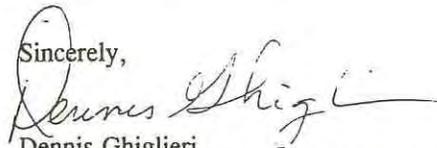
Visual Impairment Analysis

Y [The Club finds the classification criteria for evaluation of visual impacts of the SWIP to be unsatisfactory. Classifications criteria based on "high, medium and low" appear to be subjective and insufficient information has been provided to allow an independent analysis of the visual impacts in some particularly troublesome areas. Members of the Club have reviewed EISs for powerlines in which photographs from key viewpoints are altered to provide a representation of what the powerline may look like in the future. Why hasn't this type of analysis been provided particularly for WSAs and the Great Basin National Park?

Conclusion

The Sierra Club looks forward to the response to our comments. We believe our statement indicates major deficiencies in the EIS from the analysis of alternatives to the proposed project to the analysis of proposed routes. Critical data are missing for a thorough analysis of not only the need for the project as well as the visual impacts of the line on environmentally-sensitive areas, e.g. wilderness areas. New, different expertise needs to be devoted to an analysis of the environmental impacts. Interrelationships with other EISs and power projects throughout the west need to be examined and presented in order for anyone to understand the need, timing, and cumulative impacts of this proposed project. Secondary impacts, such as the possible construction of new powerplants to tie into the SWIP, are often ignored even though those impacts may be major. The economic and environmental costs associated with the construction of a powerline from a substation at Midpoint, Idaho to a substation at Apex, Nevada extend well beyond those relatively isolated points. Increased energy efficiency implemented by utilities throughout the region, the "no action alternative", offers the potential to increase our supply of energy for new uses at relatively low cost with increased reliability.

Sincerely,



Dennis Ghiglieri
Conservation Chairman, Toiyabe Chapter

RESPONSES

Y Please refer to Volume III - Human Environment Technical Report for a complete methodology for the visual analysis (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed). Photo simulations have been provided for Great Basin National Park (GBNP) and are found in the Map Volume accompanying the DEIS/DPA. Two in particular are the Lake Valley Summit simulation which looks from a proposed interpretive site for GBNP on Utah State Highway 21 and the Sacramento Pass simulation which looks at towers against Wheeler Peak from U.S. Highway 6/50. Also refer to Figures 3-13 through 3-19 for simulations of the alternative highway crossing studied in the Sacramento Pass Mitigation Reroute (refer to page 3-39 of this document).

In addition, there was also a computer terrain perspective prepared for a view from one of the proposed viewpoints within the park, a routine first step in preparing photo simulations. Because of the distance to the 230kV Corridor Route and the perceived size of the line at that distance, it was not possible to accurately depict the barely perceptible transmission line in a photo simulation.

You are correct that no photo simulations were prepared from viewpoints within WSAs because there are no specific management plans for and no specific viewpoints within these areas. The BLM was unable to find any designated viewpoints. The BLM did assume worst case for visual impacts, that views from within the WSA could occur from any location. Therefore, mitigation was applied universally for any alternative crossing near the boundary of a WSA (refer to page 3-26 of this document). In addition, the BLM also considered all access roads leading to a WSA to be a high sensitivity viewpoint.

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LETTER #B-13
COMMENTS



THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGIONAL OFFICE

September 18, 1992

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

re: Comments on DEIS for Southwest Intertie Project

Dear Mr. Simonson;

Thank you for the opportunity to comment on the Southwest Intertie Project DEIS.

The Wilderness Society is supportive of the "No Action" alternative for the following reasons:

- A [* The DEIS does not satisfactorily justify the need for the proposed construction of a 500kV power line.
- B [* The proposed 500kV power line structures threaten the visual quality of open - valleys that have not yet been spoiled by construction.
- C [* The proposed power line will contribute to the decline in the population of desert tortoise as power lines are used by ravens to perch while seeking young tortoises as prey. The power lines will also compete for space with desert tortoise habitat.

RESPONSES

- A Additional information on the purpose and need for the project is found in Chapter 3 of this document.
- B The BLM agrees that there will be impacts from the construction, operation, and maintenance of the SWIP. The BLM acknowledges that much of the mileage of the proposed action is through relatively undisturbed landscape.
- 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.

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COMMENTS

- D [* The proposed power line will run the same north-south route taken by one of the largest hawk migrations in North America. Considering that high voltage power is responsible for a large number of hawk and eagle deaths, the power line would pose a threat to these migrating birds.
- E [* There will be significant degradation to the visual quality of Great Basin National Park if the favored route for the power line is approved. The experience of 70,000 annual visitors to the National Park will be effected by the power line route that cuts over the Sacramento Pass just north of the glaciated Wheeler Peak in the Snake Range. Furthermore, the preferred route would use an existing 250kV route which was installed before the National Park was designated and was subject to far less environmental scrutiny. It is irresponsible to assume this route would be appropriate for the proposed 500kV based on its prior use.
- F [* Proposing to route the powerline adjacent to the borders of several WSAs is wholly inappropriate as the presence of the power line will degrade values of the wilderness study areas. For example, the power lines and towers will provide ravens and other predators roosts from which they may hurt tortoises and other animals within the WSAs. These indirect impacts of the powerline are not acceptable.

In summary, both the visual and the environmental quality of public resources will be subject to significant impacts if the 500kV line is constructed.

Thank you for considering our comments. Please keep us on your mailing list and continue to keep us informed.

Sincerely,

Norbert Riedy
Norbert Riedy
Senior Policy Analyst

RESPONSES

D A specific raptor migration route has not been identified. It is well known that large numbers of migratory raptors are present in the Goshute Mountains during both spring and fall.

Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission systems proposed for the SWIP would use V-guyed steel lattice, self-supporting steel lattice tubular, and 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 supporting structure 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 pages 2-12 through 2-14 of the 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.

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

E There would not be significant visual impacts to visitors at Great Basin National Park. The assumed centerline of the SWIP Ely to Delta segment (230kV Corridor Route) is approximately seven miles north of Wheeler Peak, the casual observer would likely not notice the SWIP or the existing 230kV lines from any of the viewpoints within the park. The BLM agrees that there will be significant visual effects to park visitors driving on the travel routes approaching the park (e.g., U.S. Highway 6/50) and that there will be visual impacts to some of the proposed interpretive facilities outside of the park boundaries. These impacts are all documented in the DEIS/DPA and 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).

It is true that the existing 230kV lines were constructed prior to establishment of Great Basin National Park. The BLM will consider your comments during its decision process.

F The BLM agrees that routing of the transmission line near WSAs would cause some visual impacts. These impacts are further discussed on page 3-26 of this

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COMMENTS

RESPONSES

document. However, the Wilderness Act specifically states that the designation of Wilderness shall not preclude land uses from occurring adjacent to the boundary. The Wilderness Act of 1964, and subsequent legal decisions, led to the BLM Handbook, H-8560-1, Management of Designated Wilderness Areas, where Chapter 1, Section A.1.b, states that "Wilderness must be viewed in context with other public lands, recognizing that no buffer zones will be created. Construction of high standard roads, recreation facilities or other developments adjacent to a wilderness should consider the effect they will have on the wilderness." It further states that non-wilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area. The Interim Management Policy (IMP) for the BLM does not apply to activities (e.g., transmission lines) outside of the boundaries because the IMP applies only to actions within the WSA. However, since WSAs are being managed during the period until designation or release, visual impacts were also considered from these areas.

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. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area. Also, the impact of predatory ravens on hatchling desert tortoises appears to be a local problem; it has not been documented as occurring region wide.

**COMMENT LETTERS AND
RESPONSES FROM AGENCIES**

LETTER #C-1
COMMENTS



United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
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SPOKANE, WASHINGTON 99202-1413

BURLEY DISTRICT OFFICE
SEP 8 9 49 AM '92
TAKE PRIDE IN AMERICA

RESPONSES

September 1, 1992

Memorandum

To: Karl Simonson, Bureau of Land Management, Burley District Office, Burley, Idaho
From: Supervisor, Environmental and Regulatory Analysis Section
Subject: Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan Amendment

A

For a project of this size, the Draft Environmental Impact Statement (DEIS) provided a reasonably good inventory of areas where potential conflicts with current and future mineral resource development could occur. This inventory was acknowledged by our reviewers at both Intermountain Field Operations Center (IFOC) and Western Field Operations Center (WFOC). However, the document failed to take the next and most important step--assessing the likelihood that a significant conflict requiring mitigation will occur at any of these identified areas. It is difficult to understand why this was not done, particularly when statements were made such as, "issues of concern regarding the location of the proposed transmission line include . . . , conflicts with potential mineral development," and "specific resource features that were identified on maps include . . . areas with potential mineral resources" (p. 3-4, DEIS). We could not find any identification of potential conflict areas with mineral resources, including on the maps, for the miles of mining claims traversed by the proposed transmission line rights-of-way. This mineral resource potential should be given for specific areas and should not only identify the likely commodity but also its potential to be discovered and developed in the foreseeable future.

B

We object to two statements presented in the document. The first, on page 5-39 of Technical Report Volume III, states that "Potential impacts to mining claims were not assessed because the BLM has the authority to grant rights-of-way across mineral claims." If a right-of-way can only be granted across a claim if it does not interrupt the mineral development of the claim (p. 5-39,

Mining claims crossed were not incorporated in the map volume. The mileage that each alternative would cross was recorded in Table 2-4 and 2-5 of the SWIP DEIS/DPA under the Land Use Category. Also available are some of the land owners and/or names of the claims that can be cross referenced once a final right-of-way is determined.

Project maps with known mineral resources are available in the project files. Table ER-3 (Mineral Resources Inventory), Table ER-4 (Microwave Facilities - Earth Resources Inventory), and Table ER-1 (Substation and Series Compensation Station Siting Area Inventory) of the Technical Report, Volume II - Natural Environment identify locations of known mineral resources by commodity or the potential of mineral resources at a site. This information was used as a part of the assessment. Mineral resources are included in the overall route assessment as shown in Tables 2-4 and 2-5 (Route Comparison tables) in the SWIP DEIS/DPA. Mitigation by avoidance is expected to result in no adverse impacts to mineral resources. It is beyond the scope of this EIS process to evaluate the potential of a commodity to be discovered and developed in the foreseeable future. Also refer to Appendix H in the DEIS/DPA for the locations where the technical reports can be reviewed.

B

Mineral potential is documented in Table ER-3, Volume II of the Technical Report.

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COMMENTS

B Technical Report Vol. III), then mineral resource potential must be determined before the right-of-way can be granted. This DEIS, however, chooses corridors for the transmission lines without the benefit of a mineral resource potential assessment of claims crossed. Therefore, as impacts to mining claims might occur, an attempt to identify this impact should be made.

C The other statement we disagree with is, "if a mining claim predates the right-of-way grant for the transmission line, and the claimant wants to reach what is believed to be a rich ore deposit, the right-of-way holder (the utility) would have to move the transmission line or negotiate an acceptable monetary payment for the mineral rights" (p. 4-29, DEIS). We do not support "payment for the mineral rights" as an acceptable mitigation alternative to poorly chosen rights-of-way. Purchase of mineral rights precludes adding the resource to our domestic mineral supply and prevents the boost to our economy that its development would generate. We prefer that Mitigation Measure 6, from table 4-2, be strictly adhered to and applied to areas of known mineral resources with foreseeable development potential as well as to areas of active mining. This form of mitigation would virtually eliminate the costly relocation of a poorly located transmission line.

If you have questions pertaining to these comments, please contact Michael Dunn at (509) 353-2664. Thank you.


Burton B. Gosling

RESPONSES

C The BLM agrees that monetary payment for mineral rights within a right-of-way is a less acceptable form of mitigation, not only for the reasons you stated, but also because it would be very expensive. This transmission line would have an average span of about 1/4 mile between towers and would effectively span quite large areas. Mitigation 6, as noted on Table 4-2 would be the preferred mitigation.

LETTER #C-2
COMMENTS



DISTRICT OFFICE
BURLEY, ID 83318

AUG 21 3 51 PM '92

Department of
Comprehensive Planning

RICHARD B. HOLMES
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ASSISTANT DIRECTOR

CLARK COUNTY BRIDGER BUILDING
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RESPONSES

- A Although the future plans of the connections in the Dry Lake and McCullough areas are still in the planning stages, the SWIP will interconnect with existing lines in the county.
- B Yes, the Dry Lake Substation will be connected to the local grid. The BLM anticipates that Nevada Power will incorporate this into their 1993 Resource Plan.
- C Yes. The BLM anticipates that the SWIP will interconnect with the Marketplace-Allen Transmission Project. The cumulative effects of this project are discussed in Chapters 2 and 4 of the SWIP DEIS/DPA.

August 18, 1992

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

COMMENTS ON THE DEIS/DPA FOR THE SOUTHWEST INTERTIE PROJECT

Dear Mr. Simonson:

Thank you for sending us a copy of the DEIS/DPA for the Southwest Intertie Project. After reviewing the documentation for this transmission line project, the Clark County Department of Comprehensive Planning has the following comments:

1. The DEIS/DPA does not indicate what will happen to the power once it gets to the Dry Lake substation. This raises the following questions:

- A [Will the Dry Lake substation be connected to existing transmission lines within Clark County?
- B [Will the Dry Lake substation be connected to the local grid? If this is the case, has this project been incorporated into Nevada Power Company's Resource Plan?
- C [Will the Dry Lake substation be connected to another new project, requiring construction of additional transmission lines, substations and microwave communication sites within Clark County? If so, the

LETTER C-2

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COMMENTS

- C [DEIS/DPA should cover the cumulative impact of the entire project rather than just this segment.
- D [• Are there any commitments between Idaho Power Company and Nevada Power Company to connect the substation to the proposed Marketplace Allen Transmission Project mentioned on page 4-81?
- E [2. The DEIS/DPA identifies numerous areas of the country where power is in short supply, but does not list any sources which would supply surplus power to the system. Is this project dependent solely on the season demand of different regions of the country for its power supplies?
- F [3. The DEIS/DPA should include more details relating to reclamation of the affected areas not used for the ongoing operations or maintenance of the project. This is of special concern because of the unique climatic conditions found in southern Nevada. The arid climate is not conducive to the natural re-establishment of native vegetation for the following reasons:
- Clark County generally receives about three to four inches of precipitation per year.
 - Weed species tend to invade disturbed areas, competing with native plants.
 - Windy conditions are common in the desert. This causes the surface disturbed soils to shift or blow away, further inhibiting the ability of vegetation to thrive.
- These conditions will discourage the re-establishment of disturbed areas even if they are re-vegetated with native plant species.
- G [4. The DEIS/DPA does not address the cumulative impacts to Clark County's population if the transmission line is connected to the local grid. The increased power supply could promote unexpected population growth pressure in the area, causing additional problems with other types of environmental or service supply factors within the County.

RESPONSES

- D Yes.
- E The SWIP is not solely dependent on seasonal demand from different regions of the West. Please refer to pages 1-5 through 1-13 of the SWIP DEIS/DPA for additional information about the transfer capabilities of the SWIP and to the expanded discussion of purpose and need in Chapter 3 of this document.
- Sources of surplus power would also be available when utility systems connected to the SWIP would be operated in "off-peak" conditions. Further, in good water years, the hydroelectric systems of the Northwest could have substantial surplus power.
- F The BLM agrees that more is needed. The SWIP EIS process is intended to make decisions on whether or not the project should be built, and if so, which route will be selected. Additional work will need to be done during the Construction, Operation, and Maintenance Plan phase to detail the rehabilitation methods and other aspects of the project (refer to page 1-34 of this document).
- G It is unlikely that the addition of a transmission line to the local grid would increase the population within Clark County. The SWIP is intended to transport bulk power between regions of the West. Because it will terminate in the Las Vegas area means that the local grid could be interconnected to it. AC transmission systems in the West are typically connected to local grids via substation interconnections.

LETTER #C-2
COMMENTS

- H [5. Table 3-8 notes the population for the City of Las Vegas, yet does not reference any of the unincorporated towns/areas within the Las Vegas Valley which represent about two-thirds of the Valley's population.

These comments are based on the information the Clark County Department of Comprehensive Planning has received to date. At the present time there is not sufficient mitigative information available to fully review the overall environmental impacts associated with this project. Any additional information or understanding of this project may require further analysis and comment. If you have any questions, please contact Ron Gregory of my staff at (702) 455-4181.

Sincerely,



RICHARD B. HOLMES
DIRECTOR

RBH:RG:bh
L227

RESPONSES

- H Most cities for this table include incorporated cities or unincorporated cities through which the transmission line directly passes. Cities that were less distinct or outside of the three mile corridor were not listed in the inventory and/or table.

LETTER #C-3
COMMENTS

RESPONSES

COMMISSIONERS
ERNIE HALL
DALE PORTER
NORMAN THOMPSON
GEORGE R.E. BOUCHEP
COUNTY MANAGER
(702) 738-5398

Board of County Commissioners

ELKO COUNTY COURTHOUSE
ELKO, NEVADA 89801

September 10, 1992

A The Agency Preferred Alternative proposes to use Links 221 and 223 (refer to Impacts in the Oasis Area in Chapter 3 of this document). Your comments are noted and will be considered in the BLM's decision process.

U.S. Dept. of the Interior
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, Idaho 83318

ATTN: Mr. Karl Simonson

RE: SOUTHWEST INTERTIE PROJECT
DEIS/DPA

Dear Mr. Simonson:

The Board of County Commissioners have been advised and oriented on the SWIP as it relates to Elko County, Nevada. Specific response and concern has been received by the Board relating to Link 211 as it relates to the community area of Oasis and the Big Springs Ranch that is headquartered at Johnson Springs.

With regard to Link 211, the preferred alternate is to shift the route to the East side of the Goshute Valley using Link 221 and a portion of Link 222 to gain a easterly bearing before going South.

An acceptable alternate route to Link 211 is to use Link 221 and 223 that will somewhat alleviate the encroachment and invasion that was believed present with Link 211 as proposed.

LETTER C-3

LETTER #C-4
COMMENTS

RESPONSES



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
P.O. BOX 37127
WASHINGTON, D.C. 20013-7127



A The purpose of the Summary is to provide the reader with a relatively brief and cursory understanding of major components of the studies conducted. The BLM agrees that the Summary should also identify the major issues and concerns of the public and the agencies for the project. Refer to revised Summary on page 1 of this document.

L7617 (774)
DES-92/0023

9 OCT 1992

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

Dear Mr. Simonson:

The National Park Service (NPS) has actively participated as a cooperating agency in the development of the draft Environmental Impact Statement (DEIS)/Draft Plan Amendment for the Southwest Intertie. Since the beginning of our involvement, we have consistently identified concerns regarding the potential effects that the proposal could have on Great Basin National Park. In addition, based upon the information we have received, we believe that other alternatives, including the Direct Route and the Cutoff Route, would be preferable to the 230 kV Corridor Route. We underscore our concerns as follows.

- A [1. Summary: We are very concerned that, as required by 40 CFR 1502.12, major areas of controversy, including issues raised by the agencies and the public, are not identified. Additionally, as further stated in the regulation, issues to be resolved, including the choice among alternatives, also need to be clearly stated. We have consistently taken issue with the establishment of the transmission corridor within easy view of Great Basin National Park and have urged the choice of more preferable alternatives.

LETTER #C-4
COMMENTS

B 2. Purpose and Need: As currently written, this section does not describe the Federal action that has led to this preparation of this DEIS. Moreover, it does not identify the Bureau of Land Management (BLM) plan that may be potentially amended. An explanation of the BLM right-of-way policies in this circumstance should be added.

C 3. Planning Requirements, Environmental Review and Licensing: We are concerned with the identification of a potential need for a right-of-way listed for Lake Mead National Recreation Area (NRA) (1 of 1, Table 1-1). While the proposed Dry Lake substation is close to the park's boundary, it has been our understanding that nothing in the proposal would affect Lake Mead NRA. We reviewed both the proposal and the environmental consequences for a reference, but could find none. Since the document does not contain the requisite appendix, we may have missed the reference. If a transmission line right-of-way across Lake Mead National Recreation Area is contemplated, it should be noted that the NPS would be required to conduct a separate environmental impact statement process funded by the applicant. There would also have to be a demonstration of the lack of reasonable alternatives and non derogation to any of the values protected by this unit of the National Park System before a permit could be issued.

In addition, any rights-of-way involving lands acquired or developed with funds from the Land and Water Conservation Fund Act (L&WCF) will require compliance with Section 6(f) of that Act. Perhaps such review was intended to be identified on page 2 or 8, Table 1-1, but as currently stated it is unclear.

D 4. Preferred Route Selection, Page 13, paragraph 2: The choice of an alternate sub-station site does not change the determination concerning the environmentally preferred route. The Cutoff Route is environmentally preferred, and can be served by a sub-station north of the Robinson Summit site. This reference should be corrected.

This same conclusion is made in the sentence beginning at the bottom of page 2-53 and extending to page 2-54.

E 5. Alternatives Studied in Detail, No Action, page 2-11: At the bottom of the page, disadvantages of the no-action alternative are listed. The second identified disadvantage is misleading. While an adverse impact may result from compensating actions taken to produce energy, it is also possible that compensating actions taken may result in fewer adverse impacts than those associated with the Southwest Intertie Project (SWIP). Without knowing what those compensating actions might be, it is not

RESPONSES

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

C The SWIP proposes to terminate at a proposed substation in Dry Lake located northeast of Las Vegas. The project does not propose a right-of-way that would affect the Lake Mead National Recreation Area. The reference in Table 1-1 and has been corrected in the Errata in Chapter 4 of this document.

D While it is true that the Cutoff Route could be served by a substation at the Robinson Summit site, the environmental effects of a transmission line from the North Steptoe area to the Robinson Summit substation site would have to be added to the Cutoff Route. By using the North Steptoe substation site, the Cutoff Route would be shorter and would result in slightly fewer adverse effects than the 230kV Corridor Route. If the Cutoff Route were to use the Robinson Summit substation site, it would likely not be the environmentally preferred route because of the additional transmission segments between North Steptoe and Robinson Summit.

If the Cutoff Route connected to Robinson Summit the environmental preference for the Ely to Delta segment would likely change to the 230kV Corridor Route. Refer to Cumulative Effects on page 3-12 of this document for the future buildout scenarios and an explanation of the route and substation site preferences as well as the effects of the preferred alternatives.

E It is not possible to state with any degree of certainty what the compensating action may be if the SWIP is not constructed. You are correct that it would be difficult to prove whether compensating actions would be more or less adverse than the SWIP. However, it is not difficult to surmise that the effects would have adverse environmental consequences. This is what is stated.

LETTER #C-4
COMMENTS

possible to know if they would be adverse or beneficial. The additional actions being referenced should be clearly identified.

Similarly, the third listed disadvantage assumes that any locally generated power in urban areas would adversely impact clean air. Without knowing how that power would be generated, and to what extent, it is not possible to know if relying on locally generated power would create a greater or lesser impact than that created by SWIP. More specific analyses should be included.

6. Environmentally Preferred Alternatives, Ely to Delta, page 2-53: The first paragraph indicates that the "major concern" for the Direct Route has been expressed by Hill Air Force Base (AFB). They oppose construction of structures exceeding 35 feet high on lands under their restricted air space (a height of 30 feet is cited on page 2-56, paragraph 2, and the incorrect figure should be changed). Also the statement indicates that "serious concern for protecting the undisturbed landscape through which the route passes", has been expressed by the public and BLM. However, it should be noted that the area is currently impacted by noise from low-level military training flights.

In the narrative, it should be noted that no agreement exists between the Air Force and the BLM that limits BLM's actions regarding approval of transmission line with towers higher than 35 feet. Without this clarification, the environmental analysis of the Direct Route is not complete because it does not evaluate the impacts of placing the line under the military operating area.

The first paragraph states that concerns for the "not understood resources" of the Leland Harris Spring complex contribute to making the Direct Route "less preferred environmentally than the Cutoff Route." There is no indication of whether or not it is less environmentally preferred than the 230 kV Corridor Route. Many questions are left unanswered concerning the significance of the Leland Harris Spring Complex. Appropriate information needs to be incorporated into the DEIS in order to have a complete, comparative picture of environmental impacts across alternatives. The statement that the resources are "not understood" would seem to indicate that no conclusions can be drawn regarding environmental impacts.

The purpose of the environmental analysis is to gain the information needed to properly choose between alternatives. The reference to the "potentially unknown" cultural sites mentioned in the first paragraph is

RESPONSES

F Hill Air Force Base is opposed to towers over 30 feet high within the R-6405 Restricted Area. The Delta Direct Route would cross 55.1 miles of this Restricted Area. You are correct that the area currently is impacted by low-level flying operations. However, it is not possible to state that impacts from low-level flying would be noticeably different if the Ely to Delta segment were constructed on the Delta Direct Route. Refer to Military Air Space on page 3-22 of this document which addresses the military concerns and the concerns of neighboring land-administrating agencies.

G Refer to page 3-91 of this document for further information on the Leland-Harris Springs Complex. The BLM agrees that there are few impacts to sensitive resources at the Leland-Harris Spring Complex which cannot be effectively mitigated. One notable exception is the distinct possibility of impacting wetlands with at least one tower site. This would likely result in the need for a 404 Permit and 401 Certification under the Clean Water Act.

H You are correct that the reference to "potentially unknown" cultural sites is true on every alternative route and should not be justification for eliminating an alternative route. Refer to the Errata in Chapter 4 of this document for the correction.

LETTER #C-4
COMMENTS

H [similarly problematic. The same possibility for presently unknown cultural sites to be discovered exists on every alternative route. If the Direct Route is eliminated from further consideration for this reason, every other alternative route should be similarly eliminated.

I [The second paragraph refers to the Cutoff Route. The last two sentences of the paragraph indicate that Hill AFB has requested a maximum tower height of 105 feet above ground level. Their request appears to have been honored in the Cutoff Route, although it would also impact the other crosstie routes. It is misleading to emphasize the potential requirement for additional towers on the Cutoff Route while only stating, in reference to the 230 kV Corridor Route, that "this route also crosses through the military operating area (MOA) and the Utah Training and Testing Range (UTTR) of Hill AFB." The reader is unable to distinguish the potential difference between the two routes and may, in fact, be led to believe that one has a greater impact than the other when that actually may not be the case. This section of the document needs further clarification and analysis on this point.

J [We also think that all requests made by cooperating agencies relative to their mandates for modifications should be listed, analyzed and justification given as to why they have or have not been included as mitigation in the proposal or other alternatives.

K [The third paragraph on page 2-53, as well as throughout the document, mentions that "the 230 kV Corridor Route best satisfies the Federal Land Policy Management Act of 1976 (FLPMA) mandate to 'consolidate corridors' where possible." The designation of the 230 kV utility corridor in the Schell Resource Area Land Use Plan was done without prior review in accordance with the provisions of the National Environmental Policy Act (NEPA). Two transmission lines currently exist within the corridor, each of which underwent NEPA compliance review. However, the corridor was simply placed over the existing lines.

K [It is questionable to assume that the compliance completed for the existing lines would be identical to the compliance required to establish a corridor. Many more variables, including cumulative effects, typically would be analyzed in corridor establishment. When viewed from the perspective of the best location for a utility corridor, it is entirely possible that the existing lines were placed in the wrong location and it is conceivable that placing SWIP alongside the two existing power lines compounds an error. The conclusion that the 230 kV Corridor Route best satisfies the FLPMA mandate to consolidate corridors is unsubstantiated.

RESPONSES

I [In reference to the areas where 105-foot tower requirements on the Ely to Delta routes, a narrative description has been provided on page 3-22 to clarify where and for how many miles the 105-foot towers would be required for each of the alternative routes (see also Figure 3-5).

J [Clarification of this comment would be helpful. The BLM believes that the NPS comment relates to the concern/mandate to protect the viewshed outside of the boundary of the park vis-a-vis the legislation that established the park. The SWIP EIS process did respond to this concern by developing alternatives outside of this viewshed (i.e., the Cutoff and Direct Routes). This is discussed on page 2-30 of the SWIP DEIS/DPA. The BLM is not aware that mitigation requested by a cooperating agency was not considered or included for any of the alternatives.

K [The BLM is in compliance with Section 503 of FLPMA with its designation of the utility corridor where the existing 230kV lines are located. Given the termination points for these existing 230kV lines, the BLM feels their present location is proper, and environmental impacts are minimal. The environmental preference for the Cutoff Route has been further evaluated under Cumulative Effects on page 3-12 of this document to consider the future possible utility "buildout" in the Ely area.

LETTER #C-4
COMMENTS

K L The present review of SWIP found the Cutoff Route to be Environmentally Preferred, not the 230 kV Corridor.

7. Environmental Consequences, Direct Route, page 4-22: The lack of information about the resources at the Leland Harris Spring complex is confusing and contradictory. Discrepancies exist between the information presented on pages 4-22 and 4-51 of the DEIS, and Volume II of the Technical Report. It is stated on pages 4-22 and 4-51 of the DEIS that there are four federal candidate species (least chub, spotted frog, desert dace, and Great Basin silver-spot butterfly) known to occur at Leland Harris Spring. Pages 4-42 and 4-43, Volume II of the Technical Report indicate that three of the four are classified as Category 2 species by the U.S. Fish and Wildlife Service. The desert dace is not mentioned in the section titled "Wildlife Species of Concern in Utah." Either the DEIS or the Technical Report needs to be corrected.

L The second paragraph on page 4-22 (DEIS) also states that "high residual impacts from increased public access to the Leland-Harris Spring Complex would remain, due to the potential long-term and cumulative effects of repeated public entry to this sensitive area." The summary of impacts to wildlife in Utah due to increased public access, which appears on page 4-83, Volume II of the Technical Report, states: "Although a number of federal candidate species, such as the least chub and spotted frog occupy springs and salt marshes of Snake Valley, these habitats are very localized and potential impacts to these areas should be easily mitigated (avoidance and restricted access)." These conclusions are in conflict.

In addition, the Technical Report listing, on pages 4-80 and 4-82, of species which would encounter residual high impacts following mitigation, indicates that none of the four species of concern falls within this category. In fact, only two of the species (least chub and spotted frog) are identified as being subject to high initial impacts before mitigation.

The analysis lacks consideration of the "avoidance and restricted access" opportunities. No information is made available concerning the distribution of the sensitive species at Leland Harris Spring. If the species are confined to a very limited area, the possibility of a minor relocation of the transmission line should be carefully examined. Perhaps the sensitive species could be completely avoided, with no increase in public access to the site. If the species are widespread throughout the wetlands found in the portion of Snake Valley that would be traversed by the Direct Route, the effect of the power line would be less significant due to the wide dispersal of the species. The DEIS does not provide enough information to draw either conclusion. It simply dismisses the

RESPONSES

L There was an inadvertent omission of the desert dace from the technical report discussions of wildlife species of concern in Utah. The dace as well as the other three species, least chub, western spotted frog, and Great Basin silver-spot butterfly, are all federal candidate, Category 2, species for listing among the threatened or endangered wildlife of the United States.

The conflicting conclusions between the technical report and the SWIP DEIS/DPA regarding the Leland-Harris Spring Complex should have been corrected prior to release of the SWIP DEIS/DPA. The conflict results from a problem with timing of events. The technical reports and maps of sensitive species distributions had been completed before Leland-Harris became an issue with the Direct Route. It was the BLM's belief at the time the technical report was prepared that the distribution of springs and wetlands in the Leland-Harris Spring Complex was sufficiently localized that the Direct Route could be constructed with minimal negative short- or long-term impacts to the resources. The BLM's position is that if the Direct Route is chosen they will request an emergency listing from the Fish and Wildlife Service for the least chub, desert dace, spotted frog, and/or Great Basin silver-spot butterfly. It was the BLM's contention at the time that construction could not occur in the area without significant deleterious impacts and that increased public access would represent long-term negative impacts. The BLM's position is represented in the SWIP DEIS/DPA. Dames & Moore's initial position, as the third-party contractor for the EIS studies, is represented in the technical report.

This scenario is also reflected in the impact analysis in the technical report. Actually, the least chub, spotted frog, and desert dace are all listed as species with initial high impacts before mitigation. The Great Basin silver-spot butterfly was not included in this category for two reasons: 1) no life history information on this species was available other than the fact that it occupies wet springs and meadows where violets are present and, 2) it was assumed that with "red-flagging" the frog and two fish species, the essential habitat requirements of the butterfly (which appear to be poorly known at this time) would also be covered.

Little information on the distribution of the four Category 2 species within the Leland-Harris spring complex has been provided. The BLM has recently obtained some information on the least chub, but nothing specific on the dace, frog, or butterfly is available. The BLM agrees that it seems possible to construct on the Direct Route utilizing avoidance and restricted access

LETTER #C-4
COMMENTS

RESPONSES

route as less environmentally preferred, even though the Technical Report notes that potential impacts "should be easily mitigated."

Table BIO-21, entitled "Wildlife Species of Concern in Utah", at the end of Volume II of the Technical Report, lists only two of the four species earlier identified as being of concern at Leland Harris Spring. The desert dace (whose status is unclear, see above) and the Great Basin silver-spot butterfly, are not listed.

The third paragraph on page 4-22 states that "Residual impacts to sage grouse would be adverse, long term, and significant despite mitigative measures." As with the discussion on the Leland Harris Spring sensitive species, this conclusion is not supported by the information in the Technical Report, Volume II, page 4-73.

8. Hagerman Fossil Beds National Monument: References to this unit of the National Park System are inconsistent throughout the document. The proper name should be used throughout.

9. Antelope Springs Trilobite Beds: In chapter three, the Affected Environment, the description of the Cutoff Route should reference Antelope Springs Trilobite Beds as a potential National Natural Landmark. We have attached a map that shows its location.

As a cooperating agency, the National Park Service continues to have disagreements with the information and conclusions drawn in this complex document. The BLM proposal that would select the 230 kV route is relatively unsupported. We strongly urge the BLM to reconsider the feasibility of the Direct Route and the selection of a more environmentally desirable alternative.

Please contact Kheryn Klubnikin, Environmental Quality Division, at (202) 208-5126 if you have any questions regarding these comments. We appreciate the opportunity to comment.

Sincerely,



Denis P. Galvin
Associate Director
Planning and Development

mitigation strategies. The BLM also agrees that if the species in question are distributed more or less throughout wetlands in the Snake Valley that the effects of the transmission line would be less significant.

When Table BIO-21 was prepared, information that the desert dace and Great Basin silver-spot butterfly were species of concern was not available.

Conflicts between the SWIP DEIS/DPA and the technical report are corrected in the Errata in Chapter 4 of this document. Also refer to page 3-91 of this document for further information on the Leland-Harris spring complex.

Refer to the Errata in Chapter 4 of this document for the appropriate corrections for Hagerman Fossil Beds National Monument.

Refer to page 3-38 for a description of the Antelope Spring Trilobite Beds.

LETTER #C-5
COMMENTS

RESPONSES

STATE OF NEVADA



DEPARTMENT OF ADMINISTRATION

Capitol Complex
Carson City, Nevada 89710
Fax (702) 687-3983
(702) 687-4065

September 22, 1992

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

Re: SAI NV # 93300030 Project: EIS, Southwest Intertie
Project, Nevada

Dear Mr. Simonson:

Attached are additional State comments to those received from the Nevada Department of Wildlife concerning the above referenced project. These comments constitute the State Clearinghouse review of this proposal as per Executive Order 12372. Please address these comments or concerns in your final decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Sparks II".

Ron Sparks II
State Clearinghouse Coordinator

LETTER #C-5
COMMENTS

RESPONSES

BOB MILLER
Governor

STATE OF NEVADA
PUBLIC SERVICE COMMISSION OF NEVADA
REGULATORY OPERATIONS STAFF

Capitol Complex
727 Fairview Drive
Carson City, Nevada 89710
(702) 687-6001



TERRY PAGE
Director of Regulatory Operations

KELLY JACKSON
Staff Counsel

10 September 1992

Ron Sparks
Nevada State Clearinghouse
Department of Administration
Budget Division
Blasdel Building, Room 204
Carson City, Nevada 89710

Ref: EIS, Southwest Intertie Project, SAI # 93300030

Dear Mr. Sparks:

Table 1-1, Chapter 1 of the Draft Environmental Impact Statement/Draft Plan Amendment for the Southwest Intertie Project, properly identifies the Public Service Commission of Nevada as one agency which must issue approval before commencing construction. The Utility Environmental Protection Act (NRS 704.820-900) requires an approval from the Commission for transmission lines and substations of 200 kilovolts or more.

LETTER #C-5
COMMENTS

RESPONSES

In addition, two Nevada electric utilities, Nevada Power Company and Sierra Pacific Power Company, are subject to the provisions of NRS 704.741-751, which pertain to resource plan approval by the Commission. Participation by either of these utilities in this project would be subject to Commission review and approval of the triennial resource plans, or amendments thereto.

Sincerely,

Thomas H. Henderson
Thomas H. Henderson
Senior Analyst



CONSUMER DIVISION:

Carson City/Reno—687-6000

• Las Vegas—486-6550

• Other Areas—800-992-0900, Ext. 87-6000

(1) 1224

LETTER C-5

LETTER #C-5
COMMENTS



BOB MILLER, Governor

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada 89712

September 2, 1992

RESPONSES

GARTH F. DULL, Director

In Reply Refer to:

[Ron Sparks, Coordinator
Nevada State Clearinghouse
Department of Administration
Budget Division
Blasdel Building, Room 204
Carson City, Nevada 89710

PSD 7.02

Dear Mr. ~~Sparks~~ :

The Nevada Department of Transportation has reviewed the project titled EIS, Southwest Intertie Project, Nevada SAI #93300030.

Based on the information submitted we have the following comments on the proposed project.

Permits will be required for crossing NDOT Right-of-Way.

Thank you for the opportunity to review this project.

Sincerely,


D. Keith Maki
Assistant Director
Planning

DKM:JD:dq

LETTER #C-5
COMMENTS

BOB MILLER
Governor

STATE OF NEVADA



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
123 W. Nye Lane, Room 208
Capitol Complex
Carson City, Nevada 89710
(702) 687-5138

September 10, 1992

M E M O R A N D U M

TO: Nevada State Clearinghouse
FROM: Eugene M. Hattori, Archaeologist *EMH*
SUBJECT: EIS, Southwest Intertie Project, Nevada.
DUE DATE: September 18, 1992
NEVADA SAI: #93300030

The Nevada Division of Historic Preservation and Archeology has reviewed the subject document and supporting technical reports. The Division supports the EIS as written and notes that the discussions regarding cultural resources for Nevada are comprehensive. We do have some minor comments concerning the technical supporting documentation:

- 1). The predicted sensitivity zone model may be biased against early-Holocene sites associated with dry lake basins and upland areas (eg. quarries) occupied prior to the invasion of pinyon during the mid-Holocene.

RESPONSES

A Predicting the locations and types of archaeological and historical sites is an extremely complex challenge, and a relatively undeveloped science. The sensitivity model developed for the purposes of this EIS is based on environmental variables, but is quite simplistic and intended to provide only the grossest indications of major variations in the density of archaeological and historical sites as a tool for evaluating competing alternatives. If the project is approved for construction, intensive inventory data will be collected along the selected route. The State Historic Preservation Office will be consulted regarding inventory strategies, resource evaluations, and development of avoidance or mitigation measures as the design of the project proceeds. Consideration of how climatic changes affected human societies living in the region can be pursued as an aspect of any follow-up studies.

LETTER C-5

A

LETTER #C-5
COMMENTS

- A [Past climatic changes and historic invasion of pinyon into sagebrush-grasslands are also factors ignored by the model. These are by no means fatal flaws, but are unaddressed problems.
- B [2). Cultural resource agency contacts (SHPO, BLM, and Forest Service) for Nevada are dated and should be corrected. For example, Roland Westergard retired as Nevada SHPO in 1990. Ronald James - SHPO, Alice Baldrice-deputy SHPO, Eugene Hattori - archaeologist.
- C [3). Nevada does have a state historic preservation plan with a number of completed elements.

RESPONSES

- B Collection of data on which the regional study was based began in 1987. Thus the planning for this project has been a very long-term undertaking. There has been substantial turnover of personnel in many of the involved agencies. The contacts indicated in the Cultural Environment Technical Report were left as they were when that aspect of the study was undertaken. If the project is approved for construction, agency contact lists will be updated in conjunction with follow-up studies.
- C State Historic Preservation Plans will provide a primary basis for evaluating the significance of cultural resources that may be discovered if the project is approved for construction. In accordance with the programmatic agreement (appended to the Cultural Environment Technical Report), the State Historic Preservation Officers will be consulted in the course of follow-up studies for the latest information regarding preservation plans.

LETTER #C-6
COMMENTS

RESPONSES

A No response is necessary.

PETER G. MORROS
Director

STATE OF NEVADA
BOB MILLER
Governor

L. H. DODGION
Administrator

Administration (702) 687-4670
Air Quality 687-5065
Mining Regulation and Reclamation 687-4670
Waste Management 687-5872
Federal Facilities 687-3880



Chemical Hazards Management 687-5872
Water Pollution Control 687-4670
Water Quality Planning 687-4670
FAX 885-0868

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane
Carson City, Nevada 89710

July 15, 1992

CLEARINGHOUSE COMMENTS

DUE DATE: September 18, 1992

TITLE: DEIS/DPA - Southwest Intertie Project

The Division of Environmental Protection has reviewed the subject Clearinghouse and has no comments at this time.

dl

LETTER C-6

LETTER #C-7
COMMENTS

STATE OF NEVADA

RESPONSES



DEPARTMENT OF ADMINISTRATION

Capitol Complex
Carson City, Nevada 89710
Fax (702) 687-3983
(702) 687-4065

September 22, 1992

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

Re: SAI NV # 93300030 Project: EIS, Southwest Intertie
Project, Nevada

Dear Mr. Simonson:

Attached are the comments from the Nevada Department of
Wildlife concerning the above referenced project.

These comments constitute the State Clearinghouse review of
this proposal as per Executive Order 12372. We are requesting
that you address the comments either by direct contact with NDOW
or through this office.

If I can be of further assistance do not hesitate to contact
me at (702) 687-6367.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Sparks II".

Ron Sparks II
State Clearinghouse Coordinator

LETTER C-7

1 of 9

cc: Mike Wickersham, NDOW
Enclosure

LETTER #C-7
COMMENTS

RESPONSES



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 688-1500
Fax (702) 688-1595

BOB MILLER
Governor

WILLIAM A. MOLINI
Director

Region III III-93-054
State Mailroom Complex
Las Vegas, Nevada 89158
September 18, 1992

Mr. Ron Sparks, Coordinator
Nevada State Clearinghouse
Department of Administration
Division of State Planning
Blasdel Building, Room 204
Carson City, NV 89710

RE: SAI NV#93300030

Dear Ron:

The Southwest Intertie Project (SWIP) Draft Environmental Impact Statement and Draft Plan Amendment has been reviewed by Habitat and Game personnel in Las Vegas and Elko. The Draft Environmental Impact Statement (DEIS) seems to support the analysis of most environmental variables in the mid-to-northern portions of the project route considered in that the most environmentally conscious route was proposed.

The preferred route of the project has been identified with several alternatives proposed to address anticipated impacts along the route. Late in the planning process for SWIP (1990), the original route was found to be flawed and unable to transmit the desired amount of power beyond Delta, Utah. As a result, the preferred route was altered to parallel the course of the

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transmission lines of the White Pine Power Project (WPPP) extending from Ely, Nevada to Dry Lake, Nevada. The WPPP route has been previously identified in an EIS and a Record of Decision (ROD) was made in 1985. While the WPPP power plant and transmission lines have not been constructed, it was felt that the SWIP project could "piggyback" its impacts on the WPPP route which is also the preferred path for designation as a utility corridor in the BLM's Draft Stateline Resource Management Plan (RMP).

A This DEIS is lacking in addressing the full range of impacts to wildlife and wildlife habitats south of Ely. Updates have been entered to cover the listing of the Mojave population of the desert tortoise and other subjects. The DEIS assumes that all other concerns and factors are unchanged since the WPPP EIS, however, the affected environment has not been static. The impacts of explosive growth in the Las Vegas Valley have extended beyond its geographic limits, with impacts to wildlife and associated habitat noted throughout Southern Nevada. The alternatives given in the SWIP DEIS do not address current concerns nor propose alternatives to address these concerns. In this document, only the preferred routes are addressed, leaving no room for a reevaluation of the routes or addition of any new alternatives such as a "No Action" Alternative.

B The preferred Route A contains the least adverse impacts to wildlife in Lincoln County. The route that follows Link 673 would be preferred since a key deer winter area in the Bailey Spring area would be missed and it would be just west of the West Range. Link 690 is preferred over Link 680 in this area due to high wildlife values in the Kane Springs Wash area.

C The Southern Route of the Crosstie, from Jakes Valley, south of Connors Pass and through South Spring and Hamlin Valley into Utah is the least preferred route. It traverses important sage grouse, ferruginous hawk and mule deer summer habitats and key antelope ranges and kidding grounds in Units 221, 222, and 115.

D The DEIS provides inadequate analysis of and consideration for biological resources as a whole, but particularly that portion illustrated by Panel 5 of the Map Volume, the more southerly portions of project route. Evidence for this is partly exhibited by the lack of inclusion of photo simulations found in the Map Volume of the DEIS. While the preparers recognized the obvious utility of the simulations for assessing visual impacts, there was no study on their use for assessing biological impacts in the

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A The resource investigations and impact assessment/mitigation planning were completed to an identical level of detail for all of the SWIP alternatives, including those from Ely to Dry Lake. We did not rely on the White Pine Power Project (WPPP) EIS data. Please note in Chapter 2 of the SWIP DEIS/DPA that several new alternatives were added because of sensitive resources discovered since the WPPP Record of Decision (1985). Also refer to page 2-31 of the SWIP DEIS/DPA for a discussion about how the studies for the SWIP expansion south of Ely were done to the "same level of detail" as the previous studies.

B The Agency Preferred Alternative includes Links 673 and 690.

C The least impact Ely to Delta segment route is the Cutoff Route, followed by the 230kV Corridor Route. However, with consideration of reasonably foreseeable future utility projects in the Ely area, the 230kV Corridor Route is environmentally preferred (refer to page 3-12 in this document for a discussion of cumulative effects).

D The analysis of biological resources in the SWIP DEIS/DPA is adequate and was conducted in accordance with NEPA guidelines for the purposes of selecting an alternative route. Detailed mitigation planning would occur during the development of the Construction, Operations, and Maintenance (COM) Plan. Photosimulations would be of particular value in the assessment of biological impacts in the more southerly corridors, or any of the other corridors. The biological resources sections for Affected Environment and Environmental Consequences have been clarified and expanded, and are reprinted in Chapter 3 of this document.

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D southern reaches of the proposed project route. This is particularly relevant to desert tortoise and bighorn sheep habitat.

E Several of the routes have significant impacts not identified. Preferred Route 672 crosses the Murphy Meadows south of the Kirch WMA. The area is a seasonally wet meadow which has high value to wildlife. Conflicts with bald eagle use of the area is minimally noted. Peregrine falcons, ospreys, ferruginous hawks, golden eagles, northern goshawks and 15 other raptor species recorded nearby on the Kirch Wildlife Management Area are not mentioned.

F Of equal or greater concern is the impact on waterfowl and shorebirds. Significant numbers of migratory birds are killed each year from collisions with towers and power lines. The preferred route would bisect the meadow, posing an unnecessary hazard to the thousands of birds attracted to Kirch WMA annually. There is no mention of whether a maintenance road will be constructed across the seasonal wetland area or if a crossing will be avoided. Either a bisecting road or a parallel road would greatly increase human intrusion on the area. In this instance, the southern fork (Link 671) would be environmentally preferred. While birds will likely have fatal collisions with lines and towers on this alternative, the impacts should be significantly less due to the crossing below the high use areas.

G Route 680 is an alternative which extends south-southeast from Delamar Valley, traversing the Delamar Mountains between Kane Springs and Boulder Canyon. This route is invasive to the Delamar Mountains and should receive no further consideration.

H Route 730 is an alternate which runs north of the Arrow Canyon Range and provides access to other alternatives north of Dry Lake Valley. This line crosses Arrow Canyon near the site of a proposed cultural and scenic Area of Critical Environmental Concern (ACEC). This area was proposed for a state park or similar recreational facility. With these types of resource values, little consideration should be given to this alternative.

I Route 750 is an alternative branch off of Route 730. It poses problems, for as it skirts the Moapa Indian Reservation and its designated utility corridor, and it makes intrusions onto large portions of desert bighorn sheep habitat. From the Arrow Canyon crossing, this route extends south-southwest through the eastern foothills of the Arrow Canyon Range (Dry Lake Hills). From there it proceeds into the mouth of Ute Canyon and up the south fork into

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E The Murphy Meadows have been included in a revised SWIP FEIS/PPA. Conflicts between raptors and the SWIP have also been discussed in Chapter 3 of the SWIP FEIS/PPA. During inventory work for this project, no agency personnel expressed concern over Murphy Meadows or the Kirch WMA. The preferred link (Link 672) passes to the south of the southern boundary of the Wayne Kirch WMA. Table BIO-14 (Volume II - Natural Environment Technical Report) lists 17 species of raptors that are likely to occur within the SWIP corridors (refer to Appendix H of the DEIS/DPA for locations where the technical reports can be reviewed).

F A discussion of avian mortality associated with high voltage transmission lines is included in Chapter 3 of the SWIP FEIS/PPA. Scientific literature does not support the statement that a high voltage transmission line poses a significant hazard to migratory birds. While thousands of migratory birds die each year as a result of collisions with man-made structures, high voltage transmission lines are not one of the significant sources of such mortality. The BLM will further examine placement of the preferred route with respect to the Kirch WMA and Murphy Meadows. The BLM appreciates your concern for this area and has attempted to minimize or avoid impacts in the area by placing alternatives outside the Kirch WMA. Adequate precautions will be taken to close access roads not required for maintenance or to leave them open as the BLM or the land manager/owner wish. The impacts of access disturbance are accounted for in the SWIP DEIS/DPA, including the visual impacts of the scars. Overland construction, ripping and supplemental seeding may be required for adequate road closure and rehabilitation. This detailed mitigation planning would be developed with the Construction, Operation, and Maintenance (COM) Plan.

G The BLM agrees that this route is less preferable environmentally and is not being considered in any of the routes compared in the SWIP DEIS/DPA or the SWIP FEIS/PPA.

H The BLM agrees. Link 730 was not considered further in any of the routes compared in the SWIP DEIS/DPA or the SWIP FEIS/PPA.

I The BLM agrees. Link 750 was not considered further in any of the routes compared in the SWIP DEIS/DPA or the SWIP FEIS/PPA.

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I prime bighorn habitat. The line would cross a ridge into a canyon known locally as Island Canyon. Following the east fork, the route would cross the south ridge down precipitous cliff and into the third canyon, within one half mile of the Arrows #1 Water Development. From this point the line would head southeast into the Dry Lake substation across the bajada. The amount of desert bighorn habitat invaded is significant.

J The preferred route 720 parallels U.S. 93 to the east, crossing the Gunsight Pass area and veering southeast through a gap in the Arrow Canyon Range before running directly to the Dry Lake substation site. There are several problems with this route. First, there is a proposal for a 2,000 foot separation requested between the SWIP line and an existing UNTP line. While safety and reliability guidelines are cited for this separation, it is requested later that these lines form the outer boundaries of an identified utility corridor. The Nevada Department of Wildlife suggests a separation of no greater than 500 feet. The line could be located within 200 to 250 feet of U.S. 93 without unnecessarily extending human disturbance in desert tortoise habitat.

K Along a similar line, the narrow area, or "pinch-point" between Delamar Dry Lake and Pahranaagat Wash the UNTP and SWIP lines will be placed on double-circuit towers. These towers are able to hold two separate transmission systems. The proposal is to construct two double circuit systems through the area, allowing the possible WPPP to hang its transmission lines to the "inside" of each tower at a later date. As noted previously, the WPPP is not a sure thing and in the interest of reducing impacts through this area of desert tortoise, chuckwalla and bighorn sheep migration, a single tower system of double circuit units should be able to transport both UNTP and SWIP lines through this area. In light of the listing of the desert tortoise, a system of double circuit towers (carrying UNTP and SWIP lines) should be considered through the length of tortoise habitat to minimize impacts.

L In the southern Arrow Canyon Range, Route 720 proposes to pass through a gap while maintaining the most direct route to the Dry Lake substation. When field work was done and the WPPP document submitted for public comment there was one bighorn water development north of the gap and there was no road bisecting the gap. There are now two bighorn sheep water developments which straddle the Arrow Canyon gap. The sites were selected for their location in excellent desert bighorn habitat, relationship to other bighorn habitat, accessibility for existent project designs and

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J The 2000-foot separation between the SWIP and the UNTP rights-of-way requested by the IPCo is to meet reliability criteria established by the Western States Coordinating Council (WSCC), as explained on page 2-17 of the SWIP DEIS/DPA. Each right-of-way evaluation or request within the WSCC system should consider the specific line combinations to determine whether a specific separation is required. The issue is the credibility of a simultaneous loss of the circuits involved. The WSCC criteria say:

"... the credibility of loss of a particular set of lines will depend upon the total distance of common corridor shared by the lines and upon the vulnerability of the circuits over that distance to a common mode failure. Considerations for this vulnerability assessment will include line design; length; location, whether forested, agricultural, mountainous, etc.; outage history; operational guides; and separation. For example, some utilities use separation by more than the span length as adequate to designate the circuits as being in separate corridors."

This issue is not new. For example, the Third Pacific 500kV AC Intertie requested and received miles of separation between it and the existing two 500kV interties in forested areas. This separation was required to allow adequate response time to adjust the system following the loss of the existing lines and a potential loss of the third 500kV line. Similar to the SWIP and the UNTP, the consequences of such an outage would be wide-spread outages in the WSCC system.

It is true that separation exceptions do exist in urban areas. If there is an outage, the disturbance is localized and does not have the system impact that requires the separation of lines. The reason for separating the SWIP and the UNTP lines is to meet the WSCC reliability criteria for regional transmission facilities. Placing these lines closer together could result in a considerably lower capacity rating that would render the project economically infeasible.

K The BLM believes that the desert tortoise can be protected through appropriate mitigation measures and still maintain the reliability criteria needed by the WSCC to make the SWIP viable (refer to Appendix C of this document for a copy of the Biological Opinion).

The capacity rating of the SWIP line would not be permitted if the IPCo does not comply with the WSCC separation requirement. Using double-circuit

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L construction techniques, and a low level of human disturbance. The developments have allowed bighorn sheep to expand summer use areas in the Arrow Canyon Range. Currently, bighorn use continues to increase, while human impacts remain relatively low. This bighorn critical summer use area was identified in the SWIP DEIS, but nowhere were adequate impacts and alternatives to invasion of this habitat discussed.

M The "existing" road through the gap was constructed in late March of 1985, after submission of the WPPP EIS, under suspicious circumstances. Within a week of its appearance, the road was marked for inclusion as part of the Mint 400 ORV race course. On current U.S. Geological survey maps the road is shown to dead-end at the ridge line. The Department maintains that this road is not a legal road or trail and as such, should not be considered as a viable maintenance route for SWIP. Even a dead-end maintenance road would be a problem. There will be increased traffic into the area, with a chance for significant impact on bighorns during the critical summer period. Therefore, it is recommended that this route be eliminated from consideration as a route to the Dry Lake substation. It is suggested that a route be considered around the southern tip of the Arrow Canyon Range. The route could follow the UNTP line on the east side of U.S. 93 to the point where the highway turns southeast toward I-15. Some of the obvious concerns are a longer transit through Category 1 desert tortoise habitat and an extension of the route by 10 to 12 miles. The use of double-circuit towers would probably be necessary just south of the divergence from the existing route.

N It is further recommended that any part of the route in desert tortoise habitat be restricted from competitive ORV events. It should be of primary importance to keep non-maintenance traffic to a minimum.

Other comments include:

O No reference was made to the Bureau of Land Management (BLM) Las Vegas District's Clark County Management Framework Plan (MFP) or Caliente Resource Management Plan (RMP). Even though personal communication was made with staff of the Las Vegas District, there was no apparent direct use of the Clark County MFP, Caliente RMP, or supporting documents relative to land-use considerations, decisions, or guidance in Southern Nevada. Even though the Stateline RMP in draft form, includes the SWIP route proposal, and will eventually replace the Clark County MFP, the Clark County MFP,

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towers (through desert tortoise habitat for 53.2 miles) would render the SWIP economically infeasible because the WSCC would require a considerably reduced capacity rating.

At the "pinch points" (e.g., Pahrnagat Wash), the transmission towers would have to be designed with a safety factor that is several times more redundant than would otherwise be necessary. The IPCo hopes that the WSCC will be willing to allow the 1200 MW rating with these design concessions for a short distance.

L See Response M below.

M There is an existing dirt road approximately 3/4 mile from the most southerly water development. This existing road runs for approximately 2 1/4 miles and dead-ends. This road was located on BLM's October 11, 1976 aerial photography, and was present when the second water development was constructed. This second catchment to the south of the existing road was constructed after the road was built. In the mid-1980s an extension of this road was illegally bladed for a distance of approximately 1/2 mile. However, it was not used as part of the Mint 400 ORV race course in 1985 or in any other event. The road does not tie into other roadways and the road is not held by a right-of-way.

The road is not new, and it may be used for construction access before being closed and rehabilitated. Construction of the SWIP line during the critical periods for bighorn sheep can be avoided.

The BLM understands your concern for the impact of the road through the Arrow Canyon Range, and the impact of increased public access on desert bighorn sheep. However, the BLM does not agree that the transmission should be re-routed to accommodate this concern. The most appropriate means of reducing impact to bighorn sheep is to re-contour the road and eliminate public access after construction. Limiting construction to winter months would further reduce the impact to bighorn populations.

N The BLM agrees that the road, if used for construction of the SWIP, will be closed and rehabilitated.

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O is the current land use plan in effect. As a result, information applicable to the DEIS was omitted.

P Other documents important regarding information for the desert tortoise and which affect the SWIP proposal relative to restrictive or mitigative measures include the: Short-term Habitat Conservation Plan for the Desert Tortoise in Las Vegas Valley, Clark County, Nevada (RECON 1991) and the supporting Implementation Agreement; and, Compensation for the Desert Tortoise (Desert Tortoise Management Oversight Group 1991).

Q The gila monster, Heloderma suspectum, has been classified since 1978 as a state protected reptile and provided additional status as rare (Nevada Administrative Code 503.080). Also, the gila monster is a BLM designated sensitive species. Gila monsters and their habitat occur throughout the area illustrated in Panel 5 of the Map Volume for the DEIS, yet mention or consideration of this rare lizard is completely lacking in the DEIS.

R Substantially more attention should be given to Special Status Species of wildlife identified on pages 3-24 through 3-26. Suggested species to include which are at least Federal Category 2 candidates (Federal Register, 21 November 1991, Vol. 56, No. 225, pages 58804-58835) for listing under the Endangered Species Act of 1973, as amended, include:

Pahranagat Valley Montane Vole
Spotted Frog
all invertebrates found in the study area

S There is a need to provide more effective mitigation measures to control raven populations. Currently little is done to manage and control populations of this species. The SWIP should be designed to allow minimal perches. Additional raven access would allow perpetuation of scavenging of other passerine nests and predation upon desert tortoises. In addition, there is no mention of other state sensitive species, including the sandhill crane and golden eagle. Addressing the issue of predation upon several species of wildlife within the area should be of higher priority. The use of towers by various raptors and ravens has been shown to have significant impact upon several species of wildlife, particularly sage grouse and desert tortoise.

O The BLM agrees that the Stateline RMP will replace the existing MFP for the Las Vegas District of the BLM. Page 2-28 of the SWIP DEIS/DPA lists the Management Framework Plan as the plan that was considered. The Caliente RMP was inadvertently left off of this list but is corrected in the Errata in Chapter 4 of this document.

P The SWIP EIS process will also be a plan amendment to the current land use plans. The two pertinent land use plans for the Las Vegas District are the Clark County MFP, which encompasses the area in the Stateline Resource Area for Clark County, and the Caliente MFP, which encompasses the area in the Caliente Resource Area for Lincoln County. Clarification of other land use plans is in Chapter 1 of this document.

P The BLM is aware of these documents and will consult them for assistance in the preparation of a formal Section 7 Biological Assessment that will focus strongly on tortoises and mitigation of impact to tortoises.

Q The BLM acknowledges this inadvertent omission. A discussion of Heloderma suspectum has been included in Chapter 3 of this document.

R Approximately 16 pages in the Technical Report (Volume II) were devoted to special status species. The SWIP DEIS/DPA is intended to be a brief summary of information, not an exhaustive analysis. The information included in Volume II of the Technical Report includes a discussion of the spotted frog (Rana pretiosa) and several species of invertebrates. A discussion of all invertebrates found in the study area seems inappropriate. In discussions and requests for data from land and wildlife management agency biologists in the study area, the Pahranagat Valley Montane Vole was not mentioned. The BLM acknowledges its presence on the Animal Species Review list published by the USDI Fish and Wildlife Service in November, 1991. This species will be considered for additional analysis in relation to preparation of the COM Plan for the project (refer to page 1-34 in this document). Also refer to Appendix H of the DEIS/DPA for locations where the technical reports can be reviewed.

S Control of raven populations does not fall under the purview of the project sponsors. Further, The BLM seriously doubts that available/suitable perch sites within the Great Basin and northern Mojave Desert represent limiting

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Mitigation measures which may be instituted and which are deemed appropriate should be considered during the analysis of the project are listed as follows:

1. In addition to anticipated desert tortoise or other species of special status protocols, biologists will monitor and document site localities of wildlife observed along the affected project route. Site locality descriptions would include at least conditions under which wildlife were observed, habitat description, elevation, legal description of locality, date, and full name of observer(s). This information would be provided to all appropriate agencies and interests.

2. Rehabilitation of disturbed sites, including ripping and revegetating of temporary roads, at a level of intensity to avoid after-project conditions which leave significant scars upon the desert landscape.

Additional editorial and nomenclature comments include:

1. An illustration of Alternate Routes A through G as treated in the text throughout the DEIS should be included. Further, there is no reference to these routes in the Map Volume for the DEIS. If the legs of the routes (e.g. 690, 730, 820, etc.) represented these, it was not obvious.

2. Summary, page 8, 3rd paragraph; change last line to use more correct nomenclature and be consistent with that used later in chapter 3 (e.g. on page 3-24) or elsewhere:

change(antelope, mule deer, bighorn sheep). to read,(pronghorn, mule deer, bighorn sheep, and elk).

3. Make sure all scientific nomenclature is current and correctly spelled. For example, on page 3-15 in the "Grassland" section, use of, "thistle (Salsola iberica)", is incorrect. The passage should read, "Russian thistle (Salsola kali)".

4. On page 3-24, technical reports are referred to and specifically in reference to Tables BIO-19 and BIO-20. Neither the technical reports nor the BIO Tables could be found in the DEIS package provided.

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factors to raven populations (i.e., more perch sites do not necessarily mean more ravens). The SWIP DEIS/DPA and Volume II - Natural Environment Technical Report devotes considerable attention to the issue of providing hunting perches for avian predators. Several links within the study area were eliminated from serious consideration in the route selection process because they were in locations that would provide new hunting perches for eagles and other raptors in sage grouse areas.

The impact of predatory ravens on hatchling desert tortoises appears to be a local problem. It has not been documented as occurring region wide.

The BLM will address the issue of preconstruction clearance surveys for a number of species of sensitive plants and wildlife in the COM Plan for the project (refer to page 1-34 in this document). The BLM assumes your discussion of biological monitoring and documentation of site localities and site locality descriptions relate to the construction phase of the project. It is unclear, however, if your recommendation relates to all species of wildlife at all sites along the affected route.

The BLM agrees that the construction of the SWIP will leave scars to the landscape. The rehabilitation plan that will be developed with the COM Plan is intended to heal those scars over time (refer to page 1-34 in this document). Adequate precautions will be taken to close access roads not required for maintenance or that the BLM or the land manager/owner wish to have closed. The impacts of access disturbance is accounted for in the SWIP DEIS/DPA, including the visual impacts of the scars. For overland construction ripping and supplemental seeding may be required for adequate road closure and rehabilitation.

The Alternative Routes map in the SWIP DEIS/DPA Map Volume indicated all routes, including Routes A through G. Routes A through G shared a number of common links. For example, all of Routes A through G used Link 720. None of the alternative routes used Links 730, 740, 750, 760, 770, 780, or 790. The environmental planning process eliminated links with the highest environmental impacts from further consideration as the alternative routes were assembled (from the links) for comparison in the SWIP DEIS/DPA (also refer to Appendix D of the SWIP DEIS/DPA for additional information on the subroute comparison). A complete link list for each of the alternative routes compared is found on pages 2-37, 2-38, and 2-47 of the SWIP DEIS/DPA.

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In summary, the Department finds the SWIP EIS lacking in adequate environmental analysis concerning the proposed transmission routes south of Ely. It is recommended that further analysis of impacts to wildlife habitat be done on this route with adequate alternatives and mitigative measures to address wildlife concerns.

Thank you for the opportunity to comment upon this proposed action on the public lands of Nevada. If you have any questions or require additional input, please advise.

Sincerely,



Mike Wickersham
Manager, Region III

COP:jlh

cc: Habitat Division Chief
Game - Las Vegas, Nongame, Herpetology, Panaca
Region II - Habitat

RESPONSES

- W Your comment is noted.
- X The BLM has made every effort to assure that scientific nomenclature is current and correct. The BLM agrees that "thistle" is incorrect and should be "Russian thistle". However, the BLM has deferred to a recent publication by J.H. Lehr for the specific epithet *iberica* instead of *kali* (Lehr provides *Salsola kali* as a synonym for *Salsola iberica*).
- Y Technical reports were prepared as backup documents for the biological resource portions of the SWIP DEIS/DPA. Appendix H of the SWIP DEIS/DPA explains where the Technical Reports can be reviewed. Refer to Appendix H in the Errata of Chapter 4 for locations of where additional copies of the Technical Reports can be reviewed.

LETTER #C-8
COMMENTS



Norman H. Bangert
Governor
Max J. Evans
Director

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June 22, 1992

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

RE: Southwest Intertie Project DEIS/DPA

In Reply Please Refer to Case No. L037

Dear Mr. Simonson:

The Utah State Historic Preservation Office received the above referenced DEIS/DPA on June 12, 1992. After review of the draft statement, the Utah Preservation Office offers the following technical comments for consideration.

- A [1. On 3-82,83 the references on these two pages cover the federal law thoroughly. Although this is a federal process and document, the appropriate antiquities' laws of each of the three states would be of use in this section.
- B [2. On 3-86 it appears that the separation of ethnohistoric sites and numic sites overlap. Is there a need for a ethnohistoric category in this section?
- C [3. On 3-87,88 when categories of classification are first mentioned, they need to be defined, what criterion was used to set up avoidance level one and two for example?
- D [4. On 3-89 the five sensitivity categories need to be defined also when first mentioned.
- E [5. The Utah Preservation Office would like to request a copy of the technical report, (Rogge and Wood, 1992).

RESPONSES

- A If the project is approved for construction, subsequent cultural resource studies will be pursued in consultation with State Historic Preservation Officers. This will be an opportunity to review the requirements of state antiquities laws to ensure that state requirements are met in any situations where they might apply rather than federal law.
- B How far ethnohistoric data can be extended back into prehistory is, of course, an active area for research, particularly with regard to the antiquity of Numic speaking groups in the region. The distinction between prehistory and ethnohistory is somewhat arbitrary. Separate categories were used in recognition of the different types of data (historical documents) available to reconstruct the cultural history of the ethnohistoric era. Ethnohistoric resources often have special values for contemporary Native American groups.
- C Page 2-26 of the SWIP DEIS/DPA defines these planning criteria. This has been corrected in the Errata in Chapter 4 of this document.
- D The types of cultural resources assigned to the five defined sensitivity categories are listed on pages 3-89 and 3-90 of the SWIP DEIS/DPA. The sensitivity classifications are further discussed on pages 9-74 through 9-76 of the Volume IV - Cultural Environment Technical Report. Refer to Appendix H of the DEIS/DPA for locations where the technical reports can be reviewed.
- E This has been corrected in the Errata in Chapter 4 of this document.

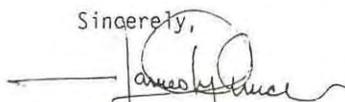
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F [6. Graphics or tables would have been of use when explaining the models used for the site prediction models and effect. They would help in following how each was constructed.

G [7. One key item is the review of the results of the models and their representation on the cultural resource maps with the DEIS. In Utah, Panel 4 used site information to outline impact levels, known resources and predicted sensitive zones. In discussion with the State Archaeologist, the model does not outline what would be several high sensitive zones. One example is where lines cross to the northeast of Sevier Lake; an area containing very complex sites with little known about what information they contain. These are only models and as stated are intended to provide some assistance in picking alternatives. The models on Panel 4, however, appear not to provide a good prediction of sensitive zones. Models could use more environmental data to develop better predictions.

This information is provided on request to assist the Bureau of Land Management with its Section 106 responsibilities as specified in 36CFR800. If you have questions or need additional assistance, please contact me at (801) 533-7039.

Sincerely,



James L. Dykman
Regulation Assistance Coordinator

JLD:L037 BLM/EIS

RESPONSES

F Graphics and tables are used in the Cultural Environment Technical Report to describe the sensitivity and impact models.

G The areas north and east of Sevier Lake are projected to have several segments of moderate impact and do stand in contrast to most of the other alternative segments in Utah where only low impacts or no impacts are projected. Predicting the locations and types of archaeological and historical sites is an extremely complex challenge. The sensitivity model developed for the purposes of this EIS is quite simplistic and is intended to provide only indications of major variations in the density and complexity of archaeological and historical sites as a tool for evaluating alternative routes. If the project is approved for construction, intensive inventory data will be collected along the selected route. The State Historic Preservation Office will be consulted regarding inventory strategies, resource evaluations, and development of avoidance or mitigation measures as the design of the project proceeds.

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COMMENTS



OFFICE OF PLANNING AND BUDGET
Resource Development Coordinating Committee

Charles E. Johnson, CPA
Office Director
Brad T. Barber
Office Deputy Director
Rod D. Millar
Committee Chairman
John A. Harja
Executive Director

116 State Capitol
Salt Lake City, Utah 84114
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September 23, 1992

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

SUBJECT: Southwest Intertie Project DEIS
State Identifier Number: UT920615-020

Dear Mr. Simonson:

The Resource Development Coordinating Committee, representing the State of Utah, has reviewed this proposal. The Division of Wildlife Resources comments:

A

The line corridors could impact raptors migrating along the Deep Creek Range and south during the fall and spring. We would like to see this mentioned in the EIS. We discussed this with the BLM on August 6, 1992, at a meeting in Delta. Because these birds normally migrate at high elevation, the 230 kV line may not pose much of a threat. However, corridors such as the 230 kV route that follow existing lines and go through canyon bottoms (such as near Great Basin National Park) should create the least hazard. There should be some discussion of this point in the EIS.

RESPONSES

- A Refer to the discussion under Avian Collision Hazard in the re-printed Biological Resources section in Chapter 3 of this document.

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COMMENTS

RESPONSES

The agency-preferred route for the Ely to Delta portion of the SWIP is the 230 kV corridor route. We strongly support this approach. Following existing corridors does not open up any new areas to impacts associated with the corridor route itself, or the associated roaded access it would create.

We support the following statements indicating the BLM's stance in the EIS: "Because the 230 kV corridor route parallels two existing 230 kV transmission lines for its entire length, this route best meets the agency criteria and Section 503 of FLPMA of utilizing existing utility corridors to the degree possible" (Page 2-57). Further, the EIS states on page 2-25, "The BLM favors the placement of new lines in existing utility corridors to minimize adverse impacts and to maintain open space values in previously undeveloped areas."

We strongly support the 230 kV corridor alternative. The following is a ranking of our support for the alternative routes in the Ely to Delta route in descending order (1 most support) and a comment on potential impacts.

- (1) 230 kV Corridor - Some pronghorn antelope and mule deer winter range impacts. Least impacts to migrating raptors.
- (2) Cutoff Route - Similar impacts to the 230 kV route, but with added impacts of opening new habitats and added vehicle/human disturbance from newly created access along the "cutoff" section.
- (3) Direct Route - Pronghorn antelope and mule deer winter range impacts. Mostly newly created corridor with associated impacts. Additional impacts to Leland-Harris Spring Complex--wetlands.
- (4) Southern Route - Potentially the most damaging to pronghorn antelope habitat, mule deer winter range, ferruginous hawk nests and other raptor nesting. This route is the longest and would be expected to create the largest amount of disturbance to all of the above habitats.

LETTER #C-9
COMMENTS

RESPONSES

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Utah State Clearinghouse at the above address or call Carolyn Wright at (801) 538-1535 or John Harja at (801) 538-1559.

Sincerely,



Brad T. Barber
State Planning Coordinator

BTB/rpj

LETTER C-9

LETTER #C-10
COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

September 16, 1992

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

Dear Mr. Simonson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Southwest Intertie Project Draft Environmental Impact Statement/Draft Plan Amendment (DEIS), Idaho, Nevada, and Utah. Our comments on this DEIS are provided pursuant to the National Environmental Policy Act (NEPA) and EPA's authorities under §309 of the Clean Air Act.

The DEIS evaluates alternatives for granting a right-of-way for a 500kV transmission line through Southern Idaho, Nevada, and western Utah. The project would include new substations, series compensation stations, and microwave facilities.

We have rated this DEIS as EC-2 -- Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions and Follow-Up Actions"). Our EC rating reflects our concerns regarding the project's potential impacts to water quality, wetlands, and biodiversity. Our 2 rating reflects the need for additional information in the Final Environmental Impact Statement (FEIS) regarding minimization, mitigation, and monitoring of impacts to these resources. Our specific comments are enclosed.

LETTER C-10

LETTER #C-10
COMMENTS

RESPONSES

We appreciate the opportunity to review this DEIS. Please send a copy of the FEIS to this office at the same time it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 744-1015 or Jeanne Dunn Geselbracht at (415) 744-1576.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wieman', with a stylized flourish at the end.

Deanna M. Wieman, Director
Office of External Affairs

LETTER #C-10
COMMENTS

Southwest Intertie Project DEIS
EPA Comments: September, 1992

RESPONSES

Water Quality

- A [1. In May, 1991, EPA published the Proposed Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters ("Guidance") pursuant to Section 6217(g) of the Coastal Zone Reauthorization Amendments of 1990. Although the Southwest Intertie Project (SWIP) is not in the coastal zone, the best management practices discussed in the Guidance are equally applicable to nonpoint source pollution control of inland waters as well. We recommend that the project sponsors consider this Guidance during construction and operation/maintenance of the SWIP. For your information, EPA expects to publish a final guidance for nonpoint source pollution in October, 1992. You may wish to contact Jovita Pajarillo of EPA Region 9's Water Quality Branch at (415) 744-2011 to obtain a copy of the guidance at that time.
- B [2. According to the DEIS, batch plants would be located every 20 to 30 miles along the right-of-way (ROW). The FEIS should ensure that batch plants would not be sited near streams, springs, or other sensitive areas, whether on public or private land. Best management practices (BMPs) for operations at batch plants should be provided in the FEIS.
- C [3. Material stockpiles, borrow areas, access roads, and other land-disturbing activities should be located away from critical areas such as steep slopes, highly erodible soils, and areas that drain directly into water bodies. Siting criteria for stockpiles should be included in the FEIS.
- D [4. The FEIS should discuss requirements for stream crossings by transmission lines. For example, is there a minimum setback objective for tower placement near streams?

Wetlands

- E [It appears that the SWIP would require the discharge of fill material into waters of the United States. This discharge would require the issuance of a Clean Water Act §404 permit and compliance with EPA's §404(b)(1) Guidelines ("Guidelines") (40 CFR 230). It is unclear from the DEIS whether the SWIP would fully comply with these regulations.

- F [1. The goal of the Clean Water Act is to maintain and restore the physical, chemical, and biological integrity of the nation's

- A Your suggestion is noted and the BLM will consider these guidelines during the preparation of the Construction, Operation, and Maintenance (COM) Plan. For more information regarding the COM Plan refer to page 1-34 of this document.
- B The BLM agrees that a list of Best Management Practices is a good idea for the batch plants. This will be done once the specific needs are better defined in the COM Plan. The construction methods will be evaluated in the COM Plan (refer to page 1-34 of this document).
- C The BLM agrees that material stockpiles and other disturbed areas be located away from sensitive resources. When the engineering design is in progress (during the COM Plan) the specific needs of the project will become more clear and the construction methods will be addressed. The siting criteria will be outlined in this document.
- D The BLM agrees that the SWIP FEIS/PPA should describe a minimum distance for a tower site from a stream crossing. The minimum distance is 200 feet. This correction to Table 4-1 (of the SWIP DEIS/DPA) is corrected in the Errata in Chapter 4 of this document.
- E Since the SWIP would be capable of spanning 1/4 mile between tower sites, the BLM does not believe that any wetlands would be impacted on the Agency Preferred Alternative. The SWIP, if approved, will fully comply with the Section 404(b)(1) Guidelines (40 CFR 230) of the Clean Water Act as indicated in Table 1-1 of the SWIP DEIS/DPA.
- F The BLM agrees that the preferred SWIP alternative would be the least environmentally damaging practicable alternative available to achieve the project purpose and need. The BLM anticipates that no acres of wetlands or other waters of the U.S. will be filled as a result of the SWIP. Existing roads will be used to the degree possible for construction access. No roads will be permitted to cross riparian areas, live streams, or wetlands unless there is absolutely no good alternative, and a 404 Permit is obtained.

LETTER #C-10
COMMENTS

RESPONSES

F waters. This goal is implemented by requiring that any permitted discharge into waters of the U.S. be the least environmentally damaging practicable alternative available to achieve the project purpose. In determining whether or not an alternative is practicable, the Guidelines view the project "in light of overall project purposes" which include consideration of cost, logistics, and technical feasibility. The DEIS does not present adequate information to determine whether the preferred alternative meets this objective as required by the Guidelines [40 CFR 230.12(a)(3)(iv)]. According to the DEIS, SWIP transmission lines and access roads would cross numerous perennial streams and washes. The FEIS should indicate how many acres of wetlands and other waters of the U.S. would be filled as a result of the SWIP.

G 2. The Guidelines prohibit the placement of fill unless appropriate steps have been taken to minimize potential adverse impacts on the aquatic ecosystem. Mitigation is required to offset any unavoidable losses. The FEIS should include the wetland mitigation plan, which demonstrates how wetland acreages, functions, and values would be fully replaced, and include specific commitments by the project applicant to carry out the mitigation. The FEIS should specify: (a) the exact location and size of mitigation areas; (b) sources, needed quantities, and distribution methods for water to maintain the mitigation areas, (c) revegetation plans, (d) maintenance and monitoring for mitigation areas, including criteria by which to measure mitigation success; and (e) contingency plans should the mitigation efforts fail.

H 3. The Guidelines require that cumulative effects (impacts that are attributable to the collective effect of a number of individual discharges of dredge or fill material) be predicted to the extent reasonable and practical. The DEIS briefly discusses other projects in the vicinities of the SWIP, but does not mention their cumulative effects on wetlands. The FEIS should specifically address this issue.

I 4. The Guidelines require that the proposed project not violate State water quality standards. Under the Clean Water Act, any federal agency applying for a §404 permit must receive §401 certification from the State.

G Again, the BLM does not anticipate any filling in wetlands, riparian areas, or waters of the U.S. If any wetlands are encountered and unavoidable during construction, the project would pursue 401 and/or 404 permitting. The SWIP would have the capability of spanning these features. Access routes and ancillary facilities will also not be permitted within these areas.

H The BLM does not anticipate any cumulative impacts to wetlands.

I The BLM understands that 401 Certification must also be complied with if a 404 Permit is needed. The BLM does not anticipate this, however, if the detailed planning does reveal such impacts, these regulations will be complied with.

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COMMENTS

Vegetation and Biodiversity

- J [1. The FEIS should indicate how many acres of riparian vegetation would be permanently and temporarily lost as a result of the SWIP and discuss mitigation requirements for these losses. The FEIS should discuss the revegetation procedures required in areas temporarily disturbed during construction. For riparian habitat permanently lost, we recommend full in-kind replacement of habitat.
- K [2. We recommend that additional measures to ensure protection of existing sensitive vegetation and/or habitats be required during construction, such as fencing and tree armoring.
- K [Since topsoil is essential to establish new vegetation, it should be stockpiled and then reapplied to the site for revegetation where possible. Stockpiles should be stabilized to prevent water and wind erosion. Although topsoil salvaged from the existing site can often be used, it must meet certain standards and topsoil may need to be brought onto the site if the existing topsoil is not adequate for establishing new vegetation.
- L [3. Mitigation measure #4 in Table 4-1 provides for reseeding if required. Under what conditions would reseeding not be required? Would reseeding be required on all public lands temporarily disturbed by the project? The FEIS should include detailed procedures for revegetation as well as the monitoring plan and success criteria that would be used to ensure successful revegetation of all land temporarily disturbed by the project. The FEIS should indicate who would be responsible for such monitoring and any necessary subsequent mitigation.
- M [4. The FEIS should discuss how hardpan soils, desert pavement, and other soils that are habitat for specialized plant species would be excavated and reclaimed. Avoidance, minimization, and/or mitigation of impacts to these communities should be addressed.
- N [5. The DEIS indicates that public use of access roads could adversely affect sensitive biological resources. The FEIS should provide for mitigation of these impacts by restricting public access where necessary to protect sensitive populations and watersheds and highly erodible soils.

RESPONSES

- J The BLM does not anticipate any loss of riparian vegetation or habitat as a result of the construction or operation of the SWIP.
- K The BLM agrees that more is needed. The SWIP EIS process is intended to facilitate decision making on whether or not the project should be built, and if so, which route will be selected. Additional work will need to be done during the COM Plan to detail the rehabilitation methods and many other aspects of the project (refer to page 1-34 of this document). In all cases the BLM will monitor the success of the restoration efforts.
- L In some cases in desert restoration the natural seed sources within the stockpiled topsoil provide the necessary revegetation. Additional seeding will likely be required by the BLM in all cases except where there is no vegetation currently (e.g., playa areas). Refer to Response K above.
- M The BLM agrees that additional work would need to be done for the specific methods to construct, operate, and maintain the SWIP. Along with rare plant surveys, cultural clearance, etc. that will be done following selection of the final route, the rehabilitation plans will be detailed and specific. The engineering of a final centerline will continue to have some siting flexibility, as stated in the SWIP DEIS/DPA. This detailed engineering will be done in conjunction with the surveys mentioned above in order to minimize disturbance to resources (e.g., wetlands, riparian areas, live streams, cultural resources, rare plant populations, etc.).
- N This has been recommended as mitigation and will be done (refer to Table 4-2, #4 of the SWIP DEIS/DPA).

LETTER #C-10
COMMENTS

Jurisdiction

- O [It is unclear whether each affected federal agency jurisdiction would assign an environmental inspector to oversee construction and maintenance of the proposed project. The FEIS should identify which federal agency and jurisdiction thereof would be responsible for ensuring resource protection by performing such tasks as carrying out plans, monitoring and enforcing best management practices, and monitoring environmental impacts of the SWIP.

Hazardous Materials

- P [The FEIS should identify enforcement mechanisms for prevention of hazardous materials spills (e.g., bonding) as well as the agency or person responsible for enforcement. The FEIS should also identify the types and amounts of hazardous materials that would likely be used in the ROWs and staging areas.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

RESPONSES

- O The BLM will monitor the construction, operation and maintenance of the SWIP. The BLM performs periodic compliance checks after the lines are in operation to assure continued compliance to the terms and conditions of the Right-of-Way Grant and to monitor environmental impacts associated with the project. If the selected route crosses lands administered by other agencies (e.g., Forest Service, Bureau of Reclamation), these agencies would assign their personnel to the project (refer to page 1-34 of this document). A COM plan will be developed as a condition of the Right-of-Way Grant prior to any Notice to Proceed with construction (refer to page 1-34 of this document). This plan will lay out specific stipulations, including management of any hazardous materials, and responsibilities of the BLM, utility companies, and contractors.

The above information will be included in the Construction discussion found in Chapter 1 in this document.

- P The COM Plan will detail how hazardous substances will be handled, treated, disposed of, etc. The purpose of the NEPA document was not specifically for the method of construction. The specifics will be laid out in the COM Plan (refer to page 1-34 of this document).

LETTER #C-10
COMMENTS

RESPONSES

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

LETTER #C-11
COMMENTS

RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240



ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

In Reply Refer To:
FWS/DHC/BFA EC 92/0050

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

Dear Mr. Simonson:

The Fish and Wildlife Service (Service) has reviewed the Bureau of Land Management (Bureau) Draft Environmental Impact Statement and Draft Plan Amendment (DEIS) for the Southwest Intertie Project.

Specific technical comments on the DEIS have been prepared to assist preparation of the final document (Enclosure A). In general, we have concluded that additional information should be provided to adequately address threatened and endangered species, wetlands, and riparian areas. Areas of shallow ground water need to be identified to determine whether they are wetlands subject to Clean Water Act jurisdiction. Mitigation measures should adequately protect wetland resources and ensure adequate restoration of disturbed areas. Additional endangered and threatened species issues, including surveys along the proposed route, should be addressed through the consultation process pursuant to section 7 of the Endangered Species Act of 1973, as amended.

We have also identified discrepancies among information provided in the DEIS, Technical Reports, and Data Tables. Further clarification is needed on why some sections of the Bureau's environmentally preferred alternative are less damaging than equivalent sections of other alternatives.

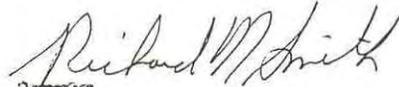
Based on the above concerns, the Service recommends that a revised DEIS be prepared, and circulated for agency review.

LETTER C-11

LETTER #C-11
COMMENTS

The opportunity to provide these comments on the DEIS is appreciated.

Sincerely,



DIRECTOR

SPECIFIC COMMENTS ON SOUTHWEST INTERTIE PROJECT

- A Page 2-18, Right-of-Way Acquisition: Right-of-Way Separation: This section and other sections on pages 1-2 and 1-9 discuss the 2000-foot separation between the SWIP and adjacent high capacity lines to comply with the Western System Coordinating Council reliability and outage criteria. However, a separation of less than 1000 feet is proposed in isolated areas along the route due to terrain or land use conflicts, and reliability would be maintained in these areas by using a higher safety factor on tower design. The Service recommends including a discussion on an alternative of a lesser separation between lines using upgraded facilities to minimize environmental impacts from habitat fragmentation.
- B Page 2-22, Construction: Hazardous Materials Within Corridor: This section states that petroleum products would be present in the transmission line corridor from the fueling, lubricating, and cleaning of vehicles and equipment. It further states that hazardous materials would not be drained onto the ground or into streams or drainage areas, and this is listed as a generic mitigation measure. However, we recommend the mitigation measure be expanded to eliminate storing of hazardous materials in designated flood zone areas as suggested in the mitigation section on page 3-33 (Volume II of the Technical Report on Natural Environment).
- C Page 2-23, Construction: Site Reclamation: The DEIS states that all practical measures would be taken to increase the chances of vegetation reestablishment in disturbed areas. Other sections of the document refer to reseeding of disturbed areas if required by the managing agency. The Construction, Operation, and Maintenance Plan, which would be prepared during the engineering and preconstruction phase of the project, would address site reclamation. Adequate assurance should be provided that reclamation measures would restore plant communities or reduce ground disturbance impacts to insignificant levels as described in many sections of Chapter 4, Environmental

RESPONSES

A This alternative is not considered reasonable since the WSCC would not give the rating for the line that is necessary for the SWIP to be viable if there are long distances with no separation. Even the short distances where there is no alternative but to have the lines closer together is of great concern for the 1200 MW rating.

A discussion about the feasibility of upgrading all facilities to meet WSCC reliability and outage criteria in an effort to reduce the need for a 2,000-foot separation is included in the Errata of Chapter 4 in this document.

The 2,000-foot separation request was specifically between the SWIP and the UNTP. Each right-of-way evaluation or request within the WSCC system should consider the specific line combinations and their outage histories to determine whether a specific separation is required. The issue is the credibility of a simultaneous loss of the circuits involved. The WSCC Criteria say:

"..., the credibility of loss of a particular set of lines will depend upon the total distance of common corridor shared by the lines and upon the vulnerability of the circuits over that distance to a common mode failure. Considerations for this vulnerability assessment will include line design; length; location, whether forested, agricultural, mountainous, etc.; outage history; operational guides; and separation. For example, some utilities use separation by more than the span length as adequate to designate the circuits as being in separate corridors."

This issue is not new. For example, the Third Pacific 500kV AC Intertie requested and received miles of separation between it and the existing two 500kV interties in forested areas. This separation was required to allow adequate response time to adjust the system following the loss of the existing lines and a potential loss of the third 500kV line. Similar to the SWIP and the UNTP, the consequences of such an outage would be wide spread outages in the WSCC system. Without this separation, that project probably would not have been feasible.

It is true that separation exceptions do exist in urban areas. If there is an outage, the disturbance is localized and does not have the system impact that requires the separation of lines.

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COMMENTS

Consequences. At a minimum, we recommend that standards for reclamation success be established and that native plants indigenous to the area and local seed collection be used in the restoration plan.

C The Service recommends measures to reduce vegetation disturbance such as crushing of vegetation to leave root systems in place, rather than bulldozing, be incorporated into the reclamation proposal. Also, livestock grazing and off-highway vehicle use on disturbed areas along the rights-of-way and ancillary facility sites during the revegetation period should be minimized. The DEIS should include habitat restoration goals and objectives as part of Table OBI-5, Generic Mitigation Measures Included in the Project Description, Volume I: Objectives, Procedures, and Results.

D Page 2-44, Substation and Series Compensation Sites: The first paragraph of this section states that the Thousand Springs Power Project was canceled in 1991. However, the Sierra Pacific Power Company has expressed interest in a transmission interconnection at this site. This interest may influence alternatives selection. The rationale for including the interconnection at Thousand Springs, even though the power project was cancelled, should be discussed.

E Pages 2-50 to 2-52, Identification of Preferred Alternatives. Environmentally Preferred Alternatives: Midpoint to Dry Lake: The Service analyzed subsections of the preferred routes for potential impacts to biological resources using the data available in the DEIS. However, the document contains inadequate information for the Service to recommend a route. Route A (Environmentally Preferred Alternative)-- Links 250, 259, 260, and 261-- appears to have more miles of high impacts to biological resources (10.7 miles) than its alternative, Route G-- links 241, 242, and 244 (5.3 miles). Route A has more miles of potential impacts to areas with high wind and water erosion potential, to ferruginous hawks, and to the endangered bald eagle. Route G, however, has more miles of potential impact to areas with shallow ground water, pronghorn antelope, sage grouse leks, long-billed curlew, and sandhill crane. Route A has a slightly lower number of miles of potential impacts to areas with shallow ground water than Route G. Some areas with shallow ground water may qualify as wetlands (see comments below). Further analysis of areas of shallow ground water that may be wetlands, and their values to wildlife, may be important in determining which route is preferable from a biological standpoint. This information should be provided in the final document.

F Alternative routes A (environmentally preferred route), G (utility preferred route), and the agency preferred route are identical through Idaho, and seem to pose few impacts to wildlife in Idaho. However, Alternative Route F and link number 81 through Idaho run through numerous springs and streams, and

RESPONSES

B The BLM agrees that hazardous materials should not be stored in designated flood zone areas. Please refer to Errata in Chapter 4 of this document.

C The BLM agrees with all of your suggestions for rehabilitation. These suggestions, including goals for habitat restoration, will be completed as part of the Construction, Operation, and Maintenance Plan (COM) Plan (refer to page 1-34 in this document).

D Potential interconnections have been identified in the Wells and Ely areas which could provide significant load or interconnection service to the local utilities. The SWIP requires series compensation sites located at quarter points along the line for voltage support. Due to the nature of series compensation stations, these sites would also be a good location for interconnections that may be desired by other utilities. The SWIP is not dependent upon any specific power plant integration. Also refer to Purpose and Need in Chapter 3 in this document.

E The Environmentally Preferred Alternative is not necessarily the alternative with the least potential impact to biological resources. It is very common in the transmission line planning/siting process for the "biologically preferred alternative" to be different from the Environmentally Preferred Alternative. Links 250, 259, 260, and 261, for example, have a total of 33.6 miles of increased public access in the 0-20% range. This represents 82% of the total length of these links. Links 241, 242, and 244 have 17.1 miles in the 0-20% range or 48% of the total length. Clearly, from the standpoint of public access, Links 250, 259, 260, and 261 are preferable, despite 5.4 miles of higher impact to biological resources. Other factors including visual resources, cultural resources, land use, and socioeconomics enter into the selection of the Environmentally Preferred Alternative. Biological resources is only one factor, albeit an important one, that contributes to the selection of the preferred alternative.

F Your preferences are noted and will be considered in the BLM's decision process.

LETTER #C-11
COMMENTS

RESPONSES

F would have high impacts to biological resources, primarily sage grouse leks. The Service recommends that those impacts be avoided.

G We also note that Route A (Environmentally Preferable Alternative), Links 291 and 293, appears to have more miles of potentially high impacts to biological resources (7 miles) than its alternative, Route G, Link 280 (3.8 miles). In this section, Route A has higher potential impacts to areas with high wind and water erosion potential, possible impacts to a greater number of intermittent streams, and potential impacts to a greater number of miles of sage grouse leks and habitat for the long-billed curlew, sandhill crane, and antelope. Route G has more miles of potential impacts to habitat for the ferruginous hawk, bald eagle, and sage grouse winter range. Route A has more acres of possible impacts to areas with shallow ground water, and has 3.8 miles of potentially high impacts to shallow ground water areas compared to 1.1 miles for Route G. Again, we believe further review may be appropriate for this segment, including analysis of potential impacts to shallow ground water areas that may be wetlands.

H Page 2-51, Identification of Preferred Alternatives. Environmentally Preferred Alternatives: Midpoint to Dry Lake: Paragraph 4 states that the Bureau of Land Management has expressed concern for Route D near Wells, Nevada and the potential for wet soils and standing water occurring at certain times of the year in the Independence Valley. Information is needed on the precise location of this area. However, the sections on Earth Resources: Ground Disturbance Impacts to Water Resources in the volume on Data Tables for Natural Environment provide information that likely is applicable to this statement. We reviewed the applicable map (Panel 2) from the Map Volume, identified the links which apply to the Independence Valley (Links 170 and 190), and note from the Data Tables for the Natural Environment that portions of these links include shallow ground water as a resource feature. The Technical Report, Volume II: Natural Environment, discusses shallow ground water on pages 3-7 under the section on Water Resources in Chapter 3. Shallow ground water is defined as areas where shallow ground water is consumed by evaporation. These areas were identified in the DEIS on a one to one million scale U.S. Geological Survey hydrologic atlas.

Piecing together information reported throughout the document and technical reports, we believe that many areas identified in the Data Tables for Natural Environment as having shallow ground water may be wetlands. We found information on wetlands to be lacking specificity. The extent to which the shallow ground water areas meet the Service's definition of wetlands as discussed in Cowardin (1979), or meet the criteria for jurisdictional wetlands found in the 1987 Corps of Engineers (Corps) Wetlands Delineation Manual is unknown, since the areas were identified from a one to one million scale hydrologic atlas and not from field surveys.

G In comparing Link 280 with Links 291 and 293, it is noted that Links 291 and 293 have more miles of soils with high wind and/or water erosion potential than the alternative Link 280. However, in assessing the impact level which incorporates the soil erosion potential, construction disturbance level, and applied mitigation, the result is more miles of alternative corridor of no or low level impact for Links 291 and 293 than for Link 280.

As with comment E, biological resources were not the only factor driving the selection of Links 291 and 293 versus Link 280.

Available mapping for jurisdictional wetlands and satellite imagery were reviewed to identify shallow ground water areas and potential wetlands. If any wetlands are encountered and unavoidable during construction, the project proponent will pursue 401 and/or 404 permits.

H Available mapping for jurisdictional wetlands and satellite imagery were reviewed to identify shallow ground water areas and potential wetlands. Many shallow ground water areas in this area occur as unvegetated playas and salt flats. Therefore, such areas do not meet the COE (1987) definition of wetlands that states " ...under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions." The two links referenced contain primarily grass and sage (i.e. sagebrush) vegetation types. Shallow groundwater types can usually be avoided or spanned by transmission line construction activities.

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COMMENTS

H The criteria for identifying wetlands along the route and the rationale for not including any areas of shallow ground water as wetlands should be discussed in the final document. We recommend that field surveys be conducted to identify wetlands along all routes. Results of such surveys may affect the designation of the environmentally preferred alternative and selection of the final route. Discharges of fill material into jurisdictional wetlands are regulated by the Corps pursuant to section 404 of the Clean Water Act.

I Page 3-2, Issues: The DEIS lists soil loss as a result of increased wind and water erosion as an issue of concern. Wind and water erosion can reduce the ability of disturbed areas to revegetate. We recommend that, in areas with moderate to high potential for wind and water erosion, specific mitigation measures be developed for revegetation of these sites to reduce or eliminate this impact.

J Page 3-15, Biological Resources: Vegetative Communities: This section states that the spectral qualities of some vegetative communities were similar on satellite images used in the analysis, and, therefore, the eleven identified plant communities were mapped as seven vegetation types. Information provided by the Service's Cooperative Research Unit at Utah State University, which is using satellite imagery to map vegetation in Nevada as part of their ongoing Gap Analysis effort, indicates that some of the vegetative communities that were combined by Dames and Moore should be readily distinguishable from Landsat imagery. The category of greatest interest is limber/bristlecone pine and quaking aspen. The pine and aspen communities should be readily distinguishable on satellite imagery. We believe it is important to distinguish them because of their different values for wildlife and the importance of bristlecone pine as a unique forest type. The section on plants on page 4-78 of Volume II of the Technical Report, Natural Environment, indicates that samples of bristlecone pine encountered along the selected alternative route would be sent to the dendrochronology lab in Tucson, Arizona. We recommend that all areas of bristlecone pine be avoided. Loss of quaking aspen groves should be compensated by planting or protecting other aspen areas. Such areas should be specifically identified to facilitate selection of the environmentally preferable alternative, and measures to mitigate for impacts to these resources specified.

An additional plant community that may be prevalent along the route but is not identified in the DEIS is mountain shrub community dominated by mountain mahogany (*Cercocarpus* spp.). This plant community type should be discussed.

K Table 4-1, Environmental Consequences: Generic mitigation measure number 4 should include references to reseeding/revegetation with "native" plant species from local seed sources. Use of local, native sources will help limit

RESPONSES

I The BLM agrees. These detailed rehabilitation plans will be developed during the COM Plan (refer to page 1-34 in this document).

J Specific forest types (i.e., individual species) were not distinguishable from the computer classification of thematic mapper satellite imagery used for mapping vegetation types for the SWIP alternatives.

Forests along ridge tops and along bedrock outcroppings above 9000 feet in elevation will be avoided by the line (or spanned) to reduce the potential for bristlecone pine to be affected. Disturbance of aspen will be mitigated by use of seedling-sapling transplants from nearby areas. Shallow blading will allow for natural regeneration from rootstocks, and transplanting would be required as necessary to supplement natural restocking to attain required stand densities. The transition from shrub-dominated plateaus and lower mountain slopes is often marked by a zone of broad-leaved scrub that is dominated by mountain mahogany (*Cercocarpus ledifolius*) and evergreen oaks (*Quercus turbinella*, *Q. emory*, *Q. dumosa*) which replace deciduous shrub oak species in southern Utah (West, 1988).¹

Mountain mahogany scrub vegetation usually occurs in patchy but dense clumps in association with grassland or low shrub steppe vegetation. Mountain brush vegetation also occurs at the upper elevation zone on some lower mountain ranges in the Great Basin, and grazing and fire suppression have increased its distribution.

Other characteristic species include antelope bitterbrush (*Purulia tridentata*), sumac (*Rhus trilobata*), buckbrush (*Rhamnus crocea*), Apache plume, (*Gallugia paradoxa*), cliffrose (*Cowania mexicana*), snowberry (*Symphoricarpos* spp.), and serviceberry (*Amelanchier* spp.)

K The BLM agrees that indigenous plant species should be utilized. These plans, incorporating your suggestions, will be developed during the COM Plan (refer to page 1-34 in this document).

¹ West, N.E., 1988, "Intermountain Deserts, Shrub Steppes, and Woodlands". In M.G. Barbara and W.D. Billings (eds.) North American Terrestrial Vegetation. Cambridge University Press. New York, NY.

LETTER #C-11
COMMENTS

K | invasion by nonindigenous species and competition with threatened, endangered, rare, or sensitive plant species.

L | Pages 4-3 and 4-4, Biological Resource Issues: A significant issue that should be addressed is the likelihood that areas with high ground water or willow riparian plant communities may qualify as wetlands and/or provide important nesting, foraging and cover habitats for migratory birds. Such areas should be identified in the data tables.

M | Page 4-10, Mitigation Planning: This section refers to the Generic and Selectively Recommended Mitigation Measures listed in Tables 4-1 and 4-2 of the DEIS and in Volume I of the Technical Report. Subsequent sections of the document state that mitigation measures would reduce many impacts to insignificant levels. The mitigation measures are very general, and the Service recommends that monitoring and contingency plans be provided so that impacts would indeed be avoided and reduced. The following comments concern mitigation measures of interest to the Service:

Generic Mitigation Measures Included in the Project Description:

4. "In construction areas ... where ground disturbance is significant or where recontouring is required, surface restoration would occur as required by the landowner or land management agency. The method of restoration would normally consist of returning disturbed areas back to their natural contour, reseeding (if required)"

N | We are concerned that where disturbance is moderate, no restoration would occur. As stated above, restoration of the natural ecosystems should be the overall goal for the entire length of the right-of-way if this measure is to reduce impacts to a level of insignificance. Only native plants indigenous to the area should be used in revegetation. Seeding may not be adequate to restore some areas, particularly in times of drought, and active state-of-the-art revegetation techniques with supplemental watering may be required. The document should provide more specific information on restoration of ecosystems within the right-of-way. Information should also be provided on requirements for mitigation/revegetation plans that would be developed, mitigation monitoring, and the monitoring reports that would be provided to land management agencies.

5. "Watering facilities ... would be repaired or replaced if they are damaged or destroyed by construction activities to their predisturbed condition as required by the landowner or land management agency."

RESPONSES

L | Areas with high groundwater that support vegetation and riparian communities containing wetlands, and that also provide important nesting, foraging and cover for migratory birds, songbirds and other wildlife species will be avoided by construction activities, or will be spanned whenever possible by transmission tower spacing.

M | Detailed mitigation will be developed as part of the COM Plan (refer to page 1-34 in this document). In most cases impacts would be reduced to insignificant levels even with mitigation. However, there may instances where this may not be possible.

N | There will be areas where no blading is done but may be used for access. These areas would not need to be restored by ripping, seeding, etc. All disturbed areas will be monitored for their rehabilitation success and measured by a performance specification. In other words, all areas will be restored within a reasonable timeframe or supplemental restoration work will have to be done. This may include supplemental watering. These detailed plans and specifications (including performance specifications) will be developed during the COM Plan (refer to page 1-34 in this document).

Natural springs will be included under watering facilities in mitigation measure #5 (refer to Table 4-1 of the SWIP DEIS/DPA) as you suggested. This correction is in the Errata in Chapter 4 of this document.

Because EMF research is inconclusive, and sometimes contradictory, definitive answers are still years away. The project sponsor attempts to site facilities in areas that avoid or minimize human exposure. This policy also minimizes visual impacts.

The project sponsor will take measurements of magnetic field levels at customers' homes at their request. The project sponsor provides this service to assist customers in gaining as much information as possible. For those customers with concerns specific to the SWIP facilities, company representatives will communicate directly with the customer and provide requested on-site measurements of the EMF levels associated with the facilities.

LETTER #C-11
COMMENTS

Our comments under measure number 4 above apply to this measure as well. Natural springs are not among the watering facilities addressed in this measure, and we recommend they be included.

- N 12. "The Project Sponsors would continue to monitor studies performed to determine the effects of audible noise and electrostatic and electromagnetic fields in order to ascertain whether these effects are significant."

We recommend that the monitoring plan identify remedial actions to be pursued if significant effects are discovered.

- O 13. "Roads would be built as near as possible at right angles to the streams and washes. Culverts would be installed where necessary. All construction and maintenance activities shall be conducted in a manner that would minimize disturbance to vegetation, drainage channels, and intermittent or perennial streambanks. In addition, road construction would include dust-control measures during construction in sensitive areas. All existing roads would be left in a condition equal to or better than their condition prior to the construction of the transmission line."

In order to mitigate impacts, we recommend this measure include the full restoration of stream, wash, and riparian plant communities temporarily disturbed by project construction. It should also include full compensation for any permanent losses to these plant communities that would occur.

Selectively Committed Mitigation Measures:

2. "Existing crossings would be utilized at perennial streams..."

P We recommend that intermittent streams with riparian vegetation important to migratory birds, such as willows (Salix spp.), desert willow (Chilopsis linearis), catclaw acacia (Acacia greggii), and mesquite (Prosopis spp.), be included in this measure where feasible.

- Q 4. "All new access roads not required for maintenance would be permanently closed using the most effective and least environmentally damaging methods appropriate to that area... This would limit new or improved accessibility into the area."

In order to mitigate impacts, closed access roads should be revegetated and livestock excluded from these areas until new vegetation is well established.

RESPONSES

O The BLM does not anticipate any loss of riparian vegetation or habitat as a result of the construction or operation of the SWIP. If during the COM Plan it is proposed to cross or disturb any of these areas the BLM will require the compensation that you suggest. Although the BLM does not anticipate any loss, disturbance to, or filling in wetland areas, the BLM would also require full compliance with Sections 404 of the Clean Water Act and Section 401 Certification. For more information regarding the COM Plan refer to page 1-34 in this document).

P Permanent and intermittent streams containing riparian scrub vegetation (willows, desert willow, catclaw acacia, mesquite) will be avoided. Mitigation measure #6 (refer to Table 4-2 of the SWIP DEIS/DPA) has been corrected in the Errata in Chapter 4 of this document.

Q The COM Plan will address specific road segments where livestock exclusion will be required for successful vegetation establishment. The requirement for reseeded is a generic mitigation measure (refer to page 1-34 in this document).

LETTER #C-11
COMMENTS

5. "Modified tower design or alternate tower type would be utilized to minimize ground disturbance, operational conflicts, visual contrast and/or avian conflicts."

R We were unable to find any information in the DEIS or Technical Report on modified tower designs to minimize avian conflicts. This information should be provided. One design we recommend in areas where predation could significantly impact sensitive wildlife species such as candidate birds and sage grouse is the use of steel wire or hard plastic fabrics attached to tower components to discourage perching by predatory birds.

11. "With the exception of emergency repair situations, right-of way construction, restoration, maintenance, and termination activities in designated areas would be modified or discontinued during sensitive periods (e.g., nesting and breeding periods) for candidate, proposed threatened and endangered, or other sensitive animal species. Sensitive periods, species affected, and areas of concern would be approved in advance of construction or maintenance by the authorized officer."

S We recommend that this measure include the provision for field surveys to be conducted on those portions of the route with habitat for candidate plant species prior to any ground disturbing activities. No proposed species are located in the project area that we are aware of at this time.

We also recommend that a mitigation measure be added to address areas where there would be permanent or long-term impacts to habitat for sensitive wildlife species. We recommend that disturbed habitat in other areas be restored or enhanced to compensate for this impact.

T Page 4-11 to 4-21, Alternative Routes: Midpoint to Dry Lake: Several portions of this section state that if access to the right-of-way is adequately controlled, impacts to candidate or sensitive plant species would not occur. However, no information is provided on how access will be controlled in these areas. This information should be provided.

Page 4-15, Environmental Consequences: Since surveys for threatened, endangered or sensitive plant species have not been conducted over much of the area, the Service recommends that the project proponent fund and conduct a detailed vegetation survey over the proposed route.

U Degradation of water quality of streams during construction is listed as an issue. This should be expanded to include wetlands, which as discussed previously may include those areas with near surface groundwater. Mitigation measures to prevent degradation of water quality should be applied to these areas.

RESPONSES

R The BLM has not specifically researched possible means of deterring perching by predatory birds on support structures. The BLM anticipates that the COM Plan that will be developed for the project following a Record of Decision will address such issues in detail (refer to page 1-34 in this document). As a means of reducing impacts from predators using towers as hunting perches, the biologists have generally argued that new transmission lines should be placed as close as possible to existing ones in areas where increased predation may be a problem.

The BLM will confer further with raptor experts and the Fish and Wildlife Service during the preparation of the COM Plan for this project (refer to page 1-34 in this document). It may be possible to discourage use of towers by predators in some areas where there are currently no existing structures associated with other transmission lines. In those areas where the SWIP would follow existing electrical transmission systems, the BLM doubts that "raptor-proofing" the new lines would yield benefits commensurate with costs.

S The COM Plan for the SWIP will address preconstruction surveys for sensitive plant and wildlife species (refer to page 1-34 in this document). The BLM is aware that there are many areas within the SWIP's corridors that have not been surveyed for rare plants, and the probability of finding populations of such species is fairly high. The BLM will consider inclusion of survey work for species on the Federal Revised List of Migratory Birds.

T Means of controlling access will be addressed in the COM Plan (refer to page 1-34 in this document).

U On-the-ground surveys will be stipulated in the COM Plan in accordance with land management agencies policies (refer to page 1-34 in this document).

LETTER #C-11
COMMENTS

RESPONSES

V [Figure ER-4. Initial Impact Levels for Water Resource Categories: This table lists alkali flats as a water resource category. Playas are also addressed briefly on page 4-11. Such areas may be used for nesting by a category 2 candidate for Federal listing as threatened or endangered, the snowy plover (*Charadrius alexandrinus nivosus*). We recommend that surveys be conducted in these areas prior to any ground disturbance activities to ensure that nesting habitat for this species is not affected by the project. This should be included as a generic mitigation measure. Playas may also provide important habitat for waterfowl and shorebirds during wet years. Such sites should be identified in the document and Technical Report and evaluated in the impact assessment.

W [Table ER-8. Summary of Water Resource Inventory: This table lists shallow ground water and wetland areas as two separate categories. As discussed above, shallow ground water areas may qualify as wetlands. The document should discuss the technical differences between these two categories. The table specifies that one spring is found along Link 92, but the document states that many springs are found along this link. This discrepancy should be clarified.

X [Page 4-41, Mammals: Pygmy Rabbit (*Brachylagus idahoensis*): This species, a category 2 candidate for Federal listing, prefers areas with dense tall sagebrush. Pre-construction surveys should be conducted to identify sites used by pygmy rabbits and these areas avoided to the extent possible. If such habitat cannot be avoided, active revegetation should be considered.

Y [Page 4-46, Sensitive Features: Floodplains, Riparian, and Wetlands: A discussion of wetlands along the proposed routes under Corps jurisdiction should be provided in this section.

Z [Page 4-48 to 4-50, Habitats of Special Concern: Nevada: This section discusses the major raptor migration corridor along the west side of the Goshute Mountains, and bald eagle winter range in Elko and White Pine Counties. Although raptor power line collisions may not be a serious problem overall, collisions may be more likely in strong winds or poor light conditions in areas with high raptor concentrations. Specific mitigation measures to reduce the potential for such collisions in these areas could include prohibition of construction of transmission lines within 1 mile of communal raptor roosts or high use areas.

AA [Pages 4-58 to 4-67, Impact Assessment and Mitigation Planning: Our review indicates that the impact assessment did not consider areas important to migratory birds, important riparian areas, and areas of shallow ground water that may qualify as wetlands and provide important habitat for wildlife. Such areas should be evaluated in determining the environmentally preferable alternative.

V The BLM acknowledges the potential presence of *Charadrius alexandrinus nivosus* as a nesting species on alkali flats within the SWIP study corridors. Your recommendation of preconstruction surveys for this species are well taken and will be included in the COM Plan for the project (refer to page 1-34 in this document). The BLM has also expanded its discussion of this type under Other Natural Land Cover, in Chapter 3 of the SWIP FEIS/PPA.

W Shallow ground water areas such as playas and salt flats do not qualify as jurisdictional wetlands if not vegetated (COE, 1987, Wetland Delineation Manual). In any case, such areas will be avoided whenever possible or spanned by proper tower placement (see item 6, Table 4-2 of the SWIP DEIS/DPA). Smaller springs which occur along this link are neither indicated on maps nor are evident on Landsat imagery, but are mentioned in the text, and will need to be considered during the COM Plan. Refer to Earth Resources in Volume II of the technical reports (refer to Appendix H for locations where the technical reports can be reviewed).

X As with *Charadrius alexandrinus nivosus* above, recommendations for field surveys for potential habitat of *Brachylagus idahoensis* along the Agency Preferred Alternative will be included in the COM Plan for this project (refer to page 1-34 in this document). The BLM will also consult with range experts regarding the potential for revegetation of dense, tall sagebrush areas that are preferred habitat for the species.

Y The page number cited references the Natural Environment (Volume II) of the Technical Report. Wetlands are defined by the Corps of Engineers (1987) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." This definition will apply to areas that are included as riparian, and in some cases, shallow ground water. This definition will be added to the Errata in Chapter 4 of this document.

Z Refer to the discussion of Avian Collision Hazard in the biological resource sections in Chapter 3 of this document.

Collisions (and electrocution) involving high voltage lines are very infrequent, highly random events that are unlikely to affect the long term probability of

LETTER #C-11
COMMENTS

RESPONSES

- The section on ground disturbance impacts on page 4-61 states that nests of some ground-nesting species of songbirds would be affected by construction activities. Mitigation measures should be developed to ensure avoidance of this impact.
- AA The section on ground disturbance impacts on page 4-72 states that sensitive plants near construction sites may be trampled, but they may recover depending on the extent of disturbance. This impact is fully preventable through pre-construction surveys and implementation of protective measures such as temporary fencing during construction. Such techniques should be included under mitigation measures.

- Technical Report: Data Tables for Natural Environment: The Service identified several discrepancies between the Data Tables and the text of the DEIS. They are as follows:
- BB Ground Disturbance Impacts to Sensitive Plant Species: Page 4-15 of the text identifies the sensitive plant, Arabis falcifruca, as being found along link 162; Penstemon bicolor, P. b. roseus, and Astragalus triquetrus could occur along links 690, 700, and 720; and Mentzelia mollis occurs along link 700. However, this information needs to be included in the table.
- Public Access Impacts to Sensitive Plant Species: Page 4-15 of the text states that Castilleja salsuginosa is found near Monte Neva Hot Springs and could be affected by future public access to this area. This factor is not reflected in the table.

- Chapter 5, Consultation and Coordination, Page 5-15:
- CC The most recent threatened and endangered species list for the proposed project in Idaho is dated July 18, 1991. This species list is no longer valid and, according to Federal Regulations, should be updated within 180 days of project construction. Species lists should be current for project proposals in Idaho, Nevada, and Utah. A list of Service field office contacts for updating and obtaining species lists follows.

survival of any species of raptor within the SWIP corridors. There may be some raptor mortality associated with the presence of new transmission lines in the SWIP system. The BLM's professional opinion, which is supported by the scientific literature, however, is that the level of increased mortality likely to occur will not be measurable and will not adversely affect the population status of any raptor species. The annual mortality of raptors from illegal shooting in western Utah and eastern Nevada is probably far higher than would be experienced in a decade or two of presence of the SWIP transmission lines.

- AA The BLM will discuss compliance with the Federal Migratory Bird Treaty Act as it applies to songbirds during preparation of the COM Plan for this project (refer to page 1-34 in this document). Consultation will take place with the Fish and Wildlife Service and state wildlife management agencies regarding this issue.

Preconstruction surveys for individuals and populations of sensitive plant species will be included in the COM Plan for the project (refer to page 1-34 in this document). The BLM agrees that impacts to such species are almost fully avoidable. The BLM believes that preconstruction surveys coupled with construction period compliance monitoring can serve this end.

- BB There is one population of Arabis falcifruca known within the one-mile corridor for Link 162 which should be on the Table. The population of Mentzelia mollis was incorrectly identified. Astragalus triquetrus is the only species which occurs within the one-mile corridors of Links 790, 800, 830, and 840. The two species of Penstemon are known to occur within the vicinity of the proposed Dry Lake substation, but not within the mapped one-mile corridor.

Information provided to use stated that Castilleja salsuginosa occurred in the vicinity of Monte Neva Hotsprings, but did not have an exact location. Therefore, this was not mapped although its existence was noted in the text.

- CC The Boise, Reno, and Salt Lake offices of the Fish and Wildlife Service were contacted on the 14th and 15th of October 1992 with regard to updated lists for threatened and endangered species, as well as species proposed for listing as threatened or endangered.

LETTER #C-11
COMMENTS

Contacts for Updating Species Lists

U.S. Fish and Wildlife Service
Boise Field Office
4696 Overland Road, Room 576
Boise, ID 83705
(208) 334-1931

U.S. Fish and Wildlife Service
Reno Field Office
4600 Kietzke Lane, Bldg. C-125
Reno, NV 89502
(702) 784-5227

U.S. Fish and Wildlife Service
Salt Lake City Field Office
1745 W. 1700 S., 2060 Admin. Bldg
Salt Lake City, UT 84105-5110
(801) 524-5630

Literature Cited

- Army Corps of Engineers, 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1.
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. Report FWS/OBS-79/31. Office of Biological Services, Fish and Wildlife Service, Washington

RESPONSES

The list of threatened and endangered species for this project will be updated prior to construction. Our contacts with the Fish and Wildlife Service indicate that no new species, except a plant, Ute Lady's Tresses (believed extirpated from Nevada), have been listed in the study area since the original letters and species lists were provided for this project. The Fish and Wildlife Service has rendered a favorable Biological Opinion for the project (refer to Appendix C of this document).

LETTER #C-12
COMMENTS

John A. Chachas
Julio C. Costello
Bunny Hill
John S. Lampros
Barlow N. White

RESPONSES

P.O. Box 1002
Ely, Nevada 89301
(702) 289-8841

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

White Pine County
Board of County Commissioners

September 14, 1992

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

Dear Mr. Simonson:

On behalf of the White Pine County Commission, I would like to thank you for the opportunity to respond to the Draft Environmental Impact Statement and Plan Amendment for the Southwest Intertie Project. The Commission endorses the proposed project because we feel it will be beneficial to White Pine County and its residents. The Southwest Intertie Project will provide jobs and encourage business activity during construction, it will generate tax revenue, and it will contribute to the transmission system needed for the White Pine Power Project.

The White Pine Power Project is a significant element in the county's efforts to diversify its economy and provide jobs for its residents. The Southwest Intertie Project will result in construction of transmission lines as well as a sub-station near Ely, both of which will enhance the future development of the White Pine Power Project.

LETTER #C-12
COMMENTS

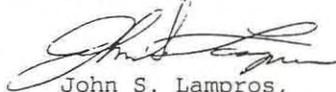
RESPONSES

At our September 9 County Commission meeting, we reviewed concerns raised by some residents of Baker who feel that the Agency Preferred Cross Tie Route to Delta, Utah, negatively impacts the

Great Basin National Park and residents of the Snake Valley area. The Commission would like to ask these concerns be taken into account in the final selection of the cross tie route as well as mitigation of the visual impacts of the transmission line and the placement of the individual towers.

Thank you for your consideration.

Sincerely,



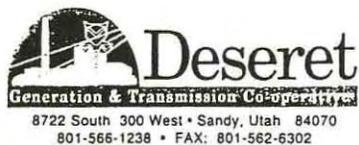
John S. Lampros,
Chairman

**COMMENT LETTERS RECEIVED AFTER
THE SWIP DEIS/DPA COMMENT PERIOD**

LETTER #D-1
COMMENTS

RESPONSES

A No response is necessary.



January 7, 1993

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

Southwest Intertie Project
Environmental Impact Statement

Dear Mr. Simonson:

Deseret Generation & Transmission Co-operative (Deseret) supports the Southwest Intertie Project (SWIP). Currently, Deseret's generation export capabilities are at their limit. Due to this constraint we are not able to sell electricity to potential purchasers to meet their load growth.

As a participant in the Utah-Nevada Transmission Project, the SWIP will interconnect and provide a valuable additional path to potential customers.

LETTER D-1

LETTER #D-1
COMMENTS

RESPONSES

If you have any questions or would like further comments, please contact me at (801) 566-1238.

Sincerely,


Merrill J. Millett
General Manager and CEO

dph

cc: Dennis B. Whitney
Los Angeles Department of Water and Power
Room 1149
P.O. Box 111
Los Angeles, California 90051-0100

Jan Packwood
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707

"Creating Power Through Cooperation"

LETTER #D-2
COMMENTS

RESPONSES

Dear Sir:

8 October 1992

I am writing in support of the "No Action" alternative for the Southwest Intertie Project.

A [The project will hideously bespoil extensive areas and vistas without a definite need to do so. The negative impacts to wildlife and Great Basin National park, a favorite of mine, cannot be justified for this project.

Please put me on your mailing list for information on the project.

Sincerely,
Frank B Guros

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 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.

LETTER #D-3
COMMENTS

Sacred Datura, Zion National Park, Utah.

Dear Mr. Simmons,

A [I ask you to please
re-consider the need for the
Idaho to L.A. powerline project.
If indeed a justification exists,
then please use the existing
powerline right-of-way in Utah.

B [A new, major power line through
an unspoiled area will have
devastating impact on raptor migration,
tortoise populations, visual appeal,
archaeological sites, etc., etc.
Thank you for your consideration.

Mark Lindberg
8 Eden Lane
Larkspur, CA 94939

From The Sierra Club Nature in Close-Up Postcard Collection.
Photograph copyright © 1988 Kevin Hass.



RESPONSES

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

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.

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

LETTER #D-3
COMMENTS

RESPONSES

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).

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 #D-4
COMMENTS

October 7, 1992
Karl Simonson
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, Idaho 83318

RESPONSES

cc: Manuel Lujan
Ly-Jamison A

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.

Dear Mr Simonson,

Please add these comments as part of the final E.I.S. for the Southwest Intertie Project.

A If the SWIP is allowed as proposed, it would require giant steel towers every 1,500 feet, which would be visible from many viewpoints within Great Basin National Park. The area's beauty relies on the scenic views and habitat for tortoise, antelope and sage grouse.

I urge you to oppose the BLM proposed action and support the "no action" alternative.

This alternative would have no adverse environmental impacts and would include eliminating financial costs.

LETTER D-4

LETTER #D-4
COMMENTS

RESPONSES

It has come a time, where Americans need to use
conservation as a means of meeting our needs,
and stop depleting our natural beauties - our
public lands. Thank you for your consideration.

Sincerely,

Kimberly Martinez
3980 Frandon Court
Simi Valley, California 93063

LETTER #D-5
COMMENTS

RESPONSES



IN REPLY REFER TO:
L7617(774)
DES-92/0023

United States Department of the Interior

NATIONAL PARK SERVICE
P.O. BOX 37127
WASHINGTON, D.C. 20013-7127



30 MAR 1993

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

Dear Mr. Simonson:

This is a follow-up to our comments, contained in our letter of October 9, 1992, on the Draft Environmental Impact Statement and Proposed Plan Amendment for the Southwest Intertie Project (SWIP). These follow-up comments respond to issues raised at your project steering committee meeting, held in Salt Lake City, Utah, December 9-10, 1993, and attended by Superintendent Al Hendricks of Great Basin National Park and Western Regional Office Environmental Coordinator Jim Huddleston, and your request for comments on the preliminary final environmental statement and subsequent redraft of the Purpose and Need section of that document. In addition, we are responding to your more recent consideration of an alternative alignment to the 230 kilovolt (kv) route in the vicinity of Great Basin National Park.

We appreciate the fact that the Bureau of Land Management and the involved power companies are willing to consider a modification of the 230 kv corridor that would move the proposed transmission line northward in the vicinity of the park. While we continue to have serious reservations over selection of the 230 kv corridor as the preferred routing, we are hopeful that this potential modification would result in the reduction of visual impact to the park. We will withhold further comment and any endorsement of this modification pending availability and our review of more detailed plans for the modification.

LETTER #D-5
COMMENTS

During the aforementioned steering committee meeting, our attendees mentioned the fact that our comment letter of October 9, 1992, did not appear in the preliminary final document. It was their understanding that you did not plan to publish letters of comment from cooperating agencies. We believe this would be a procedural error in violation of the Council of Environmental Quality Guidelines at 40 CFR Part 1503.4(b). Even though you informally provided us responses to our comments and made some modifications in the draft final environmental statement in response to those comments, we believe it necessary and proper to include the comments and associated responses in the final document.

Our review of the January 15, 1993, revision of the Purpose and Need section indicates that while there is some improvement over that presented in the draft environmental statement, the revision primarily involves the reorganization of earlier material, with certain key words being changed, and large portions which remain substantially unchanged. Our primary objection is that a tone of justification for the SWIP project remains. For example, statements frequently appear that indicate what the SWIP would do to fill needs identified in this section. The function of this section should be an impartial description of circumstances that cause the proposed action and alternatives to be considered. How well the SWIP, specifically, will meet the identified needs, is more appropriately discussed in the alternatives section. If this guideline were to be followed, the content of the Purpose and Need could be greatly reduced.

Other comments on specific sections of the Purpose and Need redraft are as follows:

- A [1. On page 3-1, Line 4, we believe that the information printed here is an expansion of the Purpose and Need described in the Summary, not Chapter 1.
- B [2. On page 3-3, under Diversity Benefits from Interconnections, paragraph 2, second sentence, the "1992 National Energy Policy Legislation" is cited as specifically addressing transmission and transmission access. This implies that the legislation relates in some way to the Purpose and Need of SWIP. If there is some specific relationship between the legislation and SWIP, it should be stated. If there is not, the reference should be omitted.
- C [3. On page 3-5, under Environmental and Consumer Benefit Tests paragraph 1, final sentence, NEPA is the National Environmental Policy Act.
- D [4. On Page 3-9, the entire Regional Economic Benefits of SWIP section is an example of material more appropriately covered under the alternatives and/or environmental consequences sections than in this section.

RESPONSES

- A The document correctly states that the information on Purpose and Need presented in the FEIS/PPA is an expansion of the Purpose and Need in Chapter 1 of the DEIS/DPA.
- B There is no specific relationship between the SWIP and the "1992 National Energy Policy Legislation". The sentence in paragraph 3 and other references to it have been removed from the SWIP FEIS/PPA.
- C This has been corrected in the SWIP FEIS/PPA.
- D The BLM believes that the information presented on economic benefits of the SWIP is appropriate information for the Purpose and Need.

LETTER #D-5
COMMENTS

RESPONSES

E 5. On page 3-11, under Bonanza Generating Station, second paragraph, it is implied that the SWIP needs to be constructed in order to make the Bonanza Generating Station profitable. The fact that all 400 megawatts (MW) of Bonanza's generating capacity must be sold to meet operating costs is the concern of Deseret Generation and Transmission Cooperative, and not SWIP. Further, it is implied that a second 400 MW generation unit could be built at Bonanza if transmission links could be developed. This would be an additional impact of the SWIP project that has not been covered in the environmental analysis.

The following specific comments are directed to the December 1992 preliminary draft of the Final Environmental Impact Statement.

F 1. We continue to be concerned with and question the rationale behind the contention, on page 3-54 of the document under Leland Harris Spring Complex, that "The presence of this spring complex near the Direct Route was a factor in not considering the Direct Route as a preferred crosstie route of the SWIP." During the December 1992 steering committee meeting, the consulting firm of Dames & Moore's biologist stated that their review of the situation indicated that transmission towers could be sited in a way that completely avoids the riparian areas in the vicinity of Leland-Harris Spring. Furthermore, their review, substantiated with color slides taken at the spring complex, revealed an area which had been heavily used by livestock with most available forage consumed up to the edge of the springs and ponds. Accordingly, we question potential biological impact of the powerline on this complex as being a significant factor in either rejecting the Direct Route as the preferred alternative or at least not designating it as the environmentally preferred alternative.

G 2. Based on concerns expressed throughout the review process on this project, we have concluded that there has not been sufficient information or supportable conclusions to select the 230 kv route as the project proposal. Therefore, we recommend its rejection in favor of either more intensive study of the Direct Route or selection of the no action alternative. Accordingly, we recommend that the last sentence on pages 1-5 of the preliminary final document be revised to read: "Because of concern for visual impacts to the park and to visitors driving to the park, the National Park Service recommends rejection of the 230 kv route."

H 3. Hagerman Fossil Beds National Monument is incorrectly identified on Figures 1-1, and 1-2, as well as in Appendix C, page 2.

I 4. On page 3-56, first paragraph the superintendent of Great Basin National Park is mentioned specifically as the source of a particular proposal. Personal sources are not identified elsewhere throughout the document and agency sources are rarely noted. If this specific attribution is believed significant in this instance, then the National Park Service, not the superintendent, should be cited as the source.

E The section describing the Bonanza Generating Station has been rewritten, refer to this section in the Purpose and Need in Chapter 3.

F The impacts to Leland-Harris Spring Complex have been lowered to moderate reflect findings of Dr. Linwood Smith. The direct impacts of the SWIP through this area could be largely mitigated. However, the BLM remains concerned that even a small impact could cause the species of concern to "go over the edge". For this reason, the cumulative effect remains significant. Refer to the Leland Harris Spring Complex section under Biological Resources in Chapter 3 on page 3-91 describing the potential impacts to the Leland-Harris Spring Complex.

Although the Leland-Harris Spring Complex was considered it was not the determining factor in the selection of the environmentally preferred route. The impacts to the military flight operations in the R-6405 Restricted Area are what made the Direct Route less environmentally favorable. Although moderate, these impacts would be extensive (approx. 65 miles) and were considered significant.

G Your comments relative to rejection of the 230kV Corridor Route will be considered by BLM in their final decision. The wording you have suggested has been incorporated into this document.

H This has been corrected in the FEIS/PPA.

I This has been corrected in the FEIS/PPA.

LETTER #D-5
COMMENTS

RESPONSES

- J 5. On page 4-8, this errata section relating to page 3-3 of the AFFECTED ENVIRONMENT remains inaccurate. Only those national parks and wilderness areas which were in existence in 1977 were designated Class I. Neither Great Basin National Park, nor Mount Moriah Wilderness Area fall into this category. The Jabidge Wilderness area did exist in 1977, and is Class I. Areas initially designated as Class II, can be redesignated as Class I, either by Congress through additional action, or by the State legislatures in the affected States. In addition, the correct size of Great Basin National Park is 77,100 acres.
- K 6. In Figure 4-4, the California National Study Trail is now designated as the California National Historic Trail. In Figure 4-12, the diagram showing the inset location on panel 3 is improperly located.
- L 7. It is our understanding that the Final EIS/PA is in an abbreviated format, which therefore references the information included in the draft document. As such, we request an addition to the information which was presented in the draft, which will address the matter of relative impacts anticipated on each of the alternative routes. Specifically, on page 4-70 and 4-71 of the June 1992 draft, a summary of anticipated cultural resource impacts for each of the routes was presented, along with an explanation of how these figures were derived. We find these figures to be most illustrative and revealing, and request that the figures developed for each of the five resource categories evaluated (Cultural, Biology, Land Use, Earth, and Visual), be presented in a single chart showing the various alternatives.
- M 8. By letter of February 11, 1993, to Jake Hoogland, Chief, Environmental Quality Division, Dames & Moore requested clarification on the status of the Antelope Springs Trilobite Beds. By Memorandum of Understanding dated May 8, 1988, the Bureau of Land Management and National Park Service set forth procedures for evaluating potential impacts on designated or potential National Natural Landmarks (NNL). The Antelope Springs Trilobite Beds are a potential NNL. Our review of the draft environmental statement indicated that the 230 kv route would pass through the central to southeast portion of the potential NNL. Therefore, we requested that this potential impact be addressed along with any needed avoidance or mitigation measures in the final document. For further information on this specific concern, please contact Cheryl A. Schreier, the NNL coordinator for our Rocky Mountain Region, at (303) 969-2850 or National Park Service, Rocky Mountain Region, 12795 West Alameda Parkway, Box 25287, Denver, Colorado 80225.

- J This has been corrected in the FEIS/PPA.
- K This has been corrected in the FEIS/PPA.
- L The cultural resources for each alternative are at best predicted, since no "on-the-ground" surveys were conducted to compare alternatives for the EIS process. Surveys will be conducted on the selected alternative.
- The cultural scoring model for each alternative used an index which was unique for cultural resources and was not used to determine route preferences for the other disciplines. It is based on the study team's concerns about the unknowns of cultural resources and the potential for mitigation.
- The basis of comparison for each of the disciplines was the miles of high, moderate, and low impacts, which represents the level of impact significance for each of the resources potentially affected. This information is presented in detailed comparative form for the five resource disciplines in Tables 1-1 and 1-2 of the FEIS/PPA for all of the alternative routes as you suggested.
- M Refer to the Antelope Spring Trilobite Beds section in Chapter 3 of this document.

LETTER #D-5
COMMENTS

RESPONSES

In summary, we believe that the preliminary final document continues to fail to provide factual information to support the selection of the 230 kv corridor. Also, the Purpose and Need section sets an improper tone for an objective analysis. In addition, the late introduction of a possible modification in the 230 kv corridor near Great Basin National Park now becomes a critically needed addition to the document in order to demonstrate that all reasonable alternatives have been considered.

For any questions on the above comments, please contact Jake Hoogland, Chief, Division of Environmental Quality, at (202) 208-5214; Superintendent Al Hendricks at (702) 234-7331; or Jim Huddlestun, Western Regional Office, at (415) 744-3968.

Sincerely,



Denis P. Galvin
Associate Director,
Planning and Development

LETTER #D-6
COMMENTS

RESPONSES

Burling Mastuit Office
BLM

Mt. 3, Box 1

Burling, Idaho, 83318

Re: SWIP Corridor Route

Nov. 1, 1982

A 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.

A [The preferred alternative for the corridor route near Great Basin National Park would degrade the vistas of Mount Wheeler and the Snake Range from outside the park and spoil views of the valleys from the park's mountainsides.

LETTER #D-6
COMMENTS

RESPONSES

Besides it is a great waste of
Taxpayers money going to the deficit.

Sincerely
John Lawrence
74 Middle Ave.
Station Island
NY 10308

LETTER #D-7
COMMENTS

RESPONSES

Sierra Pacific Power Company
Your Energy People

A No response is necessary.

Thomas D. Parker
Vice President
Electric System
Planning & Engineering

January 15, 1993

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

**RE: Southwest Intertie Project
Environmental Impact Statement**

Dear Mr. Simonson:

We understand that it is beyond the comment period for the draft EIS. However, we at Sierra Pacific Power Company (Sierra) feel it necessary to apprise you of the electrical transmission situation into Northern Nevada.

Currently, Sierra's bulk electric transmission capabilities are nearing capacity. Due to this constraint, without additional transmission facilities (such as SWIP), potential suppliers of capacity and energy to meet our current and growing customers needs for electric power must be internal to Sierra's control area.

Participation agreements for SWIP have not been finalized and it is uncertain whether Sierra will have any ownership in SWIP. However, SWIP will be using an important State of Nevada transmission corridor. SWIP 's utilization must be evaluated for the optimum use of this corridor. Sierra is interested in interconnecting with SWIP in two locations. One is with an open market 230 kV interconnection in the Ely, Nevada area, the other is a future site at 345 kV identified as the substation/series compensation siting area located Northeast of the Wells, Nevada area. This will allow Sierra to conduct economical energy transactions that would benefit our customers.

LETTER #D-7
COMMENTS

RESPONSES

If you have any questions or would like further comments, please contact me at 702-689-4569.

Sincerely,



Michael R. Smart, Director
Electric Planning

MRS:lj

cc: Dennis B. Whitney
Jan Packwood

LETTER #D-8
COMMENTS

SHILOAH COMMUNITIES, INC.
1100 Circle Dr., Eskdale, UT 84728-9702

BUREAU OF LAND MANAGEMENT
RECEIVED

JUN 10 1993

June 10, 1993

Nancy DeMille
BLM
Fillmore, UT 87776
FAX (801)743-5112
Office: (801)743-6811

Dear Ms. DeMille,

	INFO.	ACTION	INITIAL
Water Springs A.M.	_____	_____	_____
House Range A.M.	_____	_____	_____
Operations Division	_____	_____	_____

We've discussed our concerns about the impact that the ~~proposed~~ construction of the new power lines for the Intertie project will have on our lives, homes, and business. Basically the concerns can be summarized into three areas.

A Our first concern is the increased limitation of future land development in the proposed corridor for the power line. The proposed corridor separates our properties and the expanded use of the corridor restricts any further utilization of the land connecting our properties.

B Secondly, there are many concerns about the health hazards surrounding high tension power lines and while these lines do not pass over any of our homes or buildings, our daily activities have us passing under them frequently. We understand that adverse health effects are not yet proven but should they be substantiated then we would be better off to not increase our risk when other options are available and viable.

C Our third concern is about the congestion of power lines in our back yard. Again, when other options are feasible for the line our preference is to select those other options rather than to fill our country side with visually offensive power lines.

No one here favors the proposed construction of the Intertie project, but especially not in the proposed area adjacent to our property. Our recommendation is that the BLM show adverse impact from the construction of the power line in our area.

Sincerely,

Dean G. Hayward

RESPONSES

- A Impacts have been assessed for all developments and planned developments in the SWIP project area, however, impacts on future developments cannot be assessed in an area which does not have a plan for development. Your comments have been noted and will be considered in the BLM's decision process.
- B The many studies that have been conducted on EMF demonstrate that we are all affected in everyday life. Electromagnetic fields exist from microwaves, florescent lights, waterbed heaters, hair dryers, etc. The right-of-way width of 200 feet is intended to minimize these effects. Outside of the right-of-way the field levels are expected to be no higher than normally occur in household appliances. Please refer to pages 3-72 through 3-82 in the DEIS/DPA and page 3-19 in this document for additional information on EMF.
- C Your comments have been noted and will be considered in the BLM's decision process.

**FORMAL PUBLIC MEETING
COMMENTS AND RESPONSES**

Formal Public Meeting Comments and Responses

<u>Name</u>	<u>Location</u>	<u>Issue/Concern</u>	<u>Response</u>
Bill Chrisholm	Twin Falls	A. Alternative energy sources need to be evaluated.	A. Alternative sources of energy have been evaluated as alternatives to the SWIP in Chapter 2 of the DEIS/DPA. IPCo is pursuing many alternative energy sources to further diversity resources. However, alternative energy sources do not meet the purpose and need for the SWIP and do not replace the need for the SWIP.
		B. The DEIS/DPA lacks analysis of true energy conservation	B. Refer to Conservation and Demand Side Management on page 3-4 of this document.
Brenda Herrmann	Twin Falls	A. Favors alternative route for health reasons and land depreciation if the transmission line is placed on their land.	A. Your comments are noted and will be considered in BLM's decision process.
John Herrmann	Twin Falls	A. The DEIS/DPA does not analyze impacts on people, their health and loss of private property.	A. These impacts were addressed in the DEIS/DPA on pages 4-51 through 4-68 and pages 4-46 through 4-51 of Chapter 4.
		B. Concerned about the depreciation of the land. With a transmission line currently running through his property, SWIP would further depreciate the value of his land.	B. IPCo would compensate for the fair market value of lands used for transmission easement. There is no conclusive research that suggests that transmission lines depreciate the value of adjacent lands.
Bob Molyneux	Twin Falls	A. Recommended the preferred route	A. Your comments are noted and will be considered in BLM's decision process.

Formal Public Meeting Comments and Responses (Continued)

Janet OCrowley	Twin Falls	A. What agency will govern, regulate and set rates for the transmission line?	A. The Public Service Commission in each state regulates utilities that provide service to customers in that state.
William Johnson	Wells	A. If the intertie were moved to some degree, it would avoid going through our land and certainly benefit our planned development.	A. Please refer to the Agency Preferred plan in Chapter 1 of this document. The Agency Preferred Alternative is to move the route as you suggest.
Dawn King	Wells	A. To preserve visual quality, the line should be placed across the valley, not through Oasis. B. Concerned that the power line would affect the wetlands, wildlife, and waterfowl.	A. The Agency Preferred Alternative has been modified in the Oasis area in response to public comments. Also, please refer to Impacts in the Oasis Area on page 3-17 of Chapter 3 and the Agency Preferred Alternative in Chapter 1 of this document. B. These resources have been identified and impacts to them assessed. The analysis can be found beginning on pages 3-14 and 4-9 of this document, as well as the Biological Resources section in Chapter 3.

Formal Public Meeting Comments and Responses (Continued)

- | | |
|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C. Concerned about the health effects of being around the lines. | C. The many studies that have been conducted on EMF demonstrate that we are all affected in everyday life. Electromagnetic fields exist from microwaves, florescent lights, waterbed heaters, hair dryers, etc. The right-of-way width of 200 feet is intended to minimize these effects. Outside of the right-of-way the field levels are expected to be no higher than normally occur in household appliances. Please refer to pages 3-72 through 3-82 of the DEIS/DPA for additional information on EMF. |
| D. Need to address alternative energy. | D. Alternative sources of energy have been evaluated as alternatives to the SWIP in Chapter 2 of the DEIS/DPA. IPCo is pursuing many alternative energy sources to further diversity resources. However, alternative energy sources do not meet the purpose and need for the SWIP and do not replace the need for the SWIP. |
| E. Since the document did not mention the communities of Oasis and Wendover, the DEIS/DPA is inadequate. | E. Oasis was considered in the DEIS/DPA process, refer to the page 5-20 of the Technical Reports, Volume III - Human Environment. Also, Oasis has been added to the list of communities in Nevada (refer to Chapter 4 of this document). Wendover is 8 miles outside of the study corridor. |

Formal Public Meeting Comments and Responses (Continued)

- | | | | |
|----------------|-------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | F. Public notification was inadequate. | F. The BLM believes that the public notification was adequate. The planning process occurred over a several year period. Numerous news releases were sent communities in the area and newsletters were sent to a mailing list of over 3000 individuals, agencies, and organizations in order to gain public input. |
| | | G. Expressed concern about global warming. | G. Please refer to page 4-90 of the DEIS/DPA. |
| William Fisher | Wells | A. Concerned about health issues. | A. The many studies that have been conducted on EMF demonstrate that we are all affected in everyday life. Electromagnetic fields exist from microwaves, florescent lights, waterbed heaters, hair dryers, etc. The right-of-way width of 200 feet is intended to minimize these effects. Outside of the right-of-way the field levels are expected to be no higher than normally occur in household appliances. Please refer to pages 3-72 through 3-82 of the DEIS/DPA for additional information on EMF. |

Formal Public Meeting Comments and Responses (Continued)

Hiko Wirtz	Wells	<p>A. The power line affects health, property value, and the scenic qualities of the Oasis area.</p>	<p>A. The BLM agrees that the SWIP will affect the scenic quality of the landscape in the Oasis area. These impacts are documented in the DEIS/DPA, in Volume III of the Technical Report, and further in Chapter 3 of this document. The potential health effects are documented in the DEIS/DPA. There is no conclusive research that indicates that transmission lines affect human health or land values of adjacent properties. Also, the Agency Preferred Alternative has been moved so as not to affect the planned developments of Northern Holdings.</p>
		<p>B. Weren't adequately notified of the project</p>	<p>B. The planning process occurred over a several year period. Numerous news releases were sent communities in the area and newsletters were sent to a mailing list of over 3000 individuals, agencies, and organizations in order to gain public input.</p>
Jack Ekker	Wells	<p>A. Prefer the line bypass Oasis for health and quality of life reasons.</p>	<p>A. Your comment has been noted and will be considered in the BLM's decision process.</p>
Scott Brooke	Wells	<p>A. Received no legal or actual notice of the project until recently.</p>	<p>A. The BLM believes there was adequate notification about the project, the release of the DEIS/DPA, and the public meetings. The public meetings were announced in the DEIS/DPA which was released in June. There also were press releases published in local newspapers and a series of 12 newsletters mailed to over 3000 recipients over more than three years during the project.</p>

Formal Public Meeting Comments and Responses (Continued)

- B. The powerline would depreciate the value of the Oasis area property itself and visually depreciate the surrounding properties.
- B. Although there has been much research on the effects of transmission lines on property values there is no conclusive evidence that there is such an effect. With the Agency Preferred Alternative (refer to Chapter 1 of this document) we do not believe that the visual impacts to the planned developments at Oasis or to the residents of Oasis will be significant. All visual impacts are documented in the DEIS/DPA, the Technical Report, and in this document.
- C. How were the various routes selected?
- C. The various routes were selected based on the criteria located on page 2-50 of the DEIS/DPA. Also refer to page 1-6 of this document.

Alfred King

Wells

- A. The visual beauty of the Oasis area will be destroyed if the power line goes through this area.
- A. The BLM agrees that there will be visual impacts as a result of constructing the SWIP. Visual impacts were assessed from Big Springs Ranch, Oasis, all other residences, and many other sensitive viewpoints along the alternative routes. Volume III of the Technical Report documents in more detail the potential visual impacts to this area (refer to Appendix H of the DEIS/DPA for locations of these reports for public review).
- B. The power line will cause a direct loss of property, making it difficult to develop.
- B. The Agency Preferred Alternative (refer to Chapter 1 of this document) will not affect the planned development of Northern Holdings in Sections 2 and 3.

Formal Public Meeting Comments and Responses (Continued)

		C. The electromagnetic fields would cause a reduction in the potential for future residents and land owner.	C. Refer to response B above.
George Thiel	Wells	A. The potential power line through the Oasis would impact the proposed land use plans.	A. The Agency Preferred Alternative (refer to Chapter 1 of this document) will no affect the planned development of Northern Holdings in Sections 2 and 3.
Bob Barton	Wells	A. There was not enough notice to land owners to inform them of SWIP.	A. The BLM believes that there was adequate notification. Press releases were sent to 17 newspapers serving the communities in the area to announce the meetings. Newsletters announcing the meetings were also sent to all individuals and organizations on the mailing list. You have been on our mailing list since the beginning of the project and have also received a copy of the DEIS/DPA.
		B. Concerned about the visual impacts to the local people in the Oasis area rather than impacts to those who travel along Interstate 80.	B. Visual impacts were assessed from Big Springs Ranch and all other residences along the alternative routes. Our methodology states that residences are more visually sensitive than travellers on I-80, and this was used to assess visual impacts. In Table VR-7 of Volume III of the Technical Report documents that all residences have a high visual sensitivity and Interstate highways received a visual sensitivity rating of moderate.

Formal Public Meeting Comments and Responses (Continued)

Fredd Dunham	Wells	<p>A. The close proximity of high-voltage power lines to the proposed subdivisions greatly reduces the viability of the proposed land use plans.</p> <p>B. Suggests having an alternative that bypasses around Oasis and the Big Springs Ranch.</p>	<p>A. The Agency Preferred Alternative (refer to Chapter 1 of this document) will not affect the planned development of Northern Holdings in Sections 2 and 3.</p> <p>B. Note that the Agency Preferred Alternative has been changed from links 221 and 223 to 211. Refer to response A above.</p>
Patricia Dunham	Wells	<p>A. The local communities needs have not been addressed in the DEIS/DPA.</p>	<p>A. The BLM believes that local impacts are addressed. Visual impacts, land use, and socioeconomic impacts are all documented in the DEIS/DPA. We were not made aware of the planned developments by Northern Holdings, nor have they been filed with Elko County. We have now considered this planned development as a future land use (refer to Chapter 3 of this document).</p>
Joanne Garrett	Ely	<p>A. The Ely to Delta segment is a violation of the Great Basin National Park.</p> <p>B. Object to the military concerns having preference over the national park concerns.</p>	<p>A. Alternative highway crossings to mitigate potential visual impacts to the park are evaluated under the Sacramento Pass Mitigation Reroute in Chapter 3 of this document.</p> <p>B. The military concerns have been evaluated with similar criteria to other impacts. These different impacts are being carefully weighed in determining the environmental preferences. BLM will consider your concerns when it makes its decision.</p>

Formal Public Meeting Comments and Responses (Continued)

		C. Although the DEIS/DPA addresses the health issues, still believes there is a health issue.	C. The evidence is still inconclusive on health effects. Your comments are noted.
		D. The simulations did not portray the visual impacts adequately.	D. The simulations were done to create the best likeness to the real situation as current technology allows.
		E. Could not locate the tax revenue comparison tables for the various routes.	E. Refer to Table 4-4 in the DEIS/DPA. Note, an updated table including the Agency Preferred and Utility Routes were added. Refer to page 4-16 in Chapter 4 of this document.
Rod McKenzie	Ely	A. Panel 4 does not include highway 318.	A. That is correct. Highway 318 is not on the Panel 4 map. The highway is contained within the boundary of Panel 3 and 5 maps and does not occur in the area that Panel 4 map covers.
		B. Boundaries from the Humboldt National Forest are missing near Ely on Ward Mountain.	B. This error has been corrected in the Errata of this document.
Joseph Reilly	Delta	A. What is the purpose of the public hearing if the DEIS/DPA hasn't been circulated for more than one month?	A. The DEIS/DPA had been in circulation for over two months prior to the public meeting in Delta.
Rex Stanworth	Delta	A. Who will own the Ely to Delta segment of the SWIP, Idaho Power or Los Angeles Department of Water & Power?	A. The right-of-way for the Ely to Delta Segment would be assigned to IPCo who would request that BLM assign it to LADWP. The LADWP on behalf of the UNTP participants would construct, operate, and maintain this portion of the line.

Formal Public Meeting Comments and Responses (Continued)

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| B. Doesn't feel SWIP will be a benefit to the intermountain area, other than a small source of tax revenue. | B. There are potential benefits to the intermountain region from power transfers, reliability, and power sales from the various generation stations located within this region. |
| C. If LADWP gets the right-of-way granted, will they have to meet Millard County's environmental criteria and regulations that go along with having a right-of-way? | C. Yes. |
| D. Can part of an unbuilt IPP corridor be used for this project? | D. There is no unbuilt IPP corridor along the Ely to Delta segment of the SWIP. |
| E. Recommends using existing corridors for environmental reasons. | E. It is not possible to route the SWIP parallel to existing utilities for its entire length although BLM agrees in principal to your comment and the mandate of the Federal Lands Policy and Management Act (1976) to consolidate corridors. The selected routes are based on planning methodology to identify and minimize impacts. Subsequent evaluation and comparison was done to select an alternative that minimizes impacts to the degree possible. Your comments will be taken into consideration during BLM's decision process. |
| F. Would like to have an additional public meeting. | F. The BLM does not believe that an additional public meeting is warranted. |

Formal Public Meeting Comments and Responses (Continued)

Jeff Van Ee

Las Vegas

A. No-Action alternative needs further evaluation

A. The BLM believes that an adequate range of alternatives to the SWIP was evaluated and that the SWIP DEIS/DPA discussion of the no-action alternative is adequate. The no-action alternative would result in other actions being taken, which is discussed in the SWIP DEIS/DPA on pages 2-10 and 2-11.

The no-action alternative could lead to construction of new generation resources in various parts of the West because existing electrical resources would not be able to utilize the SWIP for regional exchanges. Environmental impacts associated with generation (e.g., air quality) and transmission (e.g., similar types of impacts to the SWIP) would occur if generation is constructed.

A second possible result of the no-action is that electrical rates in various parts of the West may be impacted if the SWIP is not constructed and more expensive generation options are exercised. Finally, the stability and reliability of the electrical system in the West would not be enhanced without the SWIP.

The BLM believes that the SWIP is a desirable action for the utility industry to most efficiently utilize electrical conservation and availability and minimize environmental impacts in the western United States.

Formal Public Meeting Comments and Responses (Continued)

- B. There is not sufficient data in the DEIS/DPA to judge the economic feasibility of the proposed line.
- C. The DEIS/DPA does not discuss getting the power from Dry Lake Substation through to California. The transmission line would have to go through the Sunrise Mountain WSA and other critical areas.
- D. Suggest expanding the scope to look at impacts in the future, where the power is ultimately going and when it is scheduled to arrive in some markets. Also should look at connecting and routing future power lines through critical areas.
- E. In some of the areas that SWIP will be serving there will be an excess of power at certain times of the year. Would like to see further regional analysis done to study where the power is, where it is going, and which areas are deficient.
- B. Please refer to the expanded discussion of Purpose and Need in Chapter 3 of this document.
- C. This is addressed in the discussion of the Marketplace-Allen Transmission (MAT) Project through the Sunrise Mountain area in the DEIS/DPA on pages 2-52 and 4-81. Also refer to the Cumulative Effects discussion on the MAT in Chapter 3 of this document.
- D. It is not possible without contracts in place to discuss precisely where the power will be scheduled to flow. However, the expanded purpose and need in Chapter 3 of this document has an illustration showing the potential seasonal diversity between regions of the west. We believe that the planning studies during the SWIP EIS process has analyzed all reasonable and feasible routing alternatives, and corridors have been consolidated where possible.
- E. Refer to response D above.

Formal Public Meeting Comments and Responses (Continued)

- F. Doesn't feel the DEIS/DPA adequately address the impacts the transmission line will have on adjacent WSAs.
- G. There is insufficient economic data to show why this is the least costly alternative to provide electricity both north and south

- F. This discussion has been expanded in Chapter 3 of this document.
- G. The revised Purpose and Need section in Chapter 3 of this document contains information about comparative costs of different resource options. To meet the future electrical needs of the region, transmission is shown to be the least cost alternative as compared to demand-side management (i.e., conservation) or new generation.

Formal Public Meeting Comments and Responses (Continued)

Bob Maichle

Las Vegas

A. No-Action alternative not adequately analyzed.

A. The BLM believes that an adequate range of alternatives to the SWIP was evaluated and that the SWIP DEIS/DPA discussion of the no-action alternative is adequate. The no-action alternative would result in other actions being taken, which is discussed in the SWIP DEIS/DPA on pages 2-10 and 2-11.

The no-action alternative could lead to construction of new generation resources in various parts of the West because existing electrical resources would not be able to utilize the SWIP for regional exchanges. Environmental impacts associated with generation (e.g., air quality) and transmission (e.g., similar types of impacts to the SWIP) would occur if generation is constructed.

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Formal Public Meeting Comments and Responses (Continued)

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| | | B. Will the utility corridors be able to be used for things other than transmission lines (e.g. water lines, access)? | B. IPCo and LADWP are concerned about vandalism and potential liability issues associated with sanctioned use of these rights-of-way. Especially if the liability concerns can be adequately addressed by user groups it is possible that they would be open to discussion.

The BLM can allow joint occupancy of a right-of-way by compatible uses. |
| | | C. Would like more detail concerning the banking of energy. | C. The utilities are not aware of banking of energy, although reserve margins are planned by every utility to handle unexpected occurrences. |
| David Breekey | Las Vegas | A. Concerned about the ability of the right-of-way to be used by other utilities. | A. The BLM reserves the right to require the common use of a right-of-way (ROW) and the right to authorize use of the ROW for other compatible uses. Any additional use of the ROW is subject to compliance with the National Environmental Policy Act. |
| | | B. What does Nevada Power have to say concerning the availability of power in extra by 1997 (when SWIP is in operation) or power in extra anywhere in the southwest. | B. Please refer to the discussion in the DEIS/DPA about Nevada Power on pages 1-7 and 1-8. |

Formal Public Meeting Comments and Responses (Continued)

C. The no-Action alternative needs further evaluation.

C. The BLM believes that an adequate range of alternatives to the SWIP was evaluated and that the SWIP DEIS/DPA discussion of the no-action alternative is adequate. The no-action alternative would result in other actions being taken, which is discussed in the SWIP DEIS/DPA on pages 2-10 and 2-11.

The no-action alternative could lead to construction of new generation resources in various parts of the West because existing electrical resources would not be able to utilize the SWIP for regional exchanges. Environmental impacts associated with generation (e.g., air quality) and transmission (e.g., similar types of impacts to the SWIP) would occur if generation is constructed.

A second possible result of the no-action is that electrical rates in various parts of the West may be impacted if the SWIP is not constructed and more expensive generation options are exercised. Finally, the stability and reliability of the electrical system in the West would not be enhanced without the SWIP.

The BLM believes that the SWIP is a desirable action for the utility industry to most efficiently utilize electrical conservation and availability and minimize environmental impacts in the western United States.

Formal Public Meeting Comments and Responses (Continued)

- D. Need to address alternative energy.
- E. If LADWP gets the Ely to Delta power, how does the power get to Los Angeles? To get the power to LA. a corridor will need to go through the Sunrise Mountain WSA. How will this be done?
- F. A one mile wind power corridor that goes through the Sunrise Mountain WSA is being proposed to Congress, how does this tie in with SWIP?
- D. Alternative sources of energy have been evaluated as alternatives to the SWIP in Chapter 2 of the DEIS/DPA. IPCo is pursuing many alternative energy sources to further diversity resources. However, alternative energy sources do not meet the purpose and need for the SWIP and do not replace the need for the SWIP.
- E. There are two 500kV lines currently through the Sunrise Mountain ISA. The Navajo-McCullough line and the IPP #1 500kV DC transmission line. The Utah-Nevada Transmission Project already has a third right-of-way grant from Delta through the Sunrise Mountain ISA, but cannot proceed until the WSA issue is resolved. The SWIP DEIS/DPA discusses the Marketplace-Allen Transmission (MAT) Project in the Cumulative Effects on page 4-81 of the DEIS/DPA. This project was conceived to attempt to minimize the number of total lines through the Sunrise corridor.
- F. The BLM is not aware of this proposal or any of its details.

Formal Public Meeting Comments and Responses (Continued)

- G. It is said that the Northwest power generation will be affected by the salmon being listed. How will this affect the ability to transfer power if it is not in the Northwest to bring it to Nevada?
- H. The DEIS/DPA did not adequately address why SWIP is needed.
- G. It is not clear how the listing of the salmon will impact the operation of the SWIP. The utilities believe that there may be benefits to the salmon by operating the SWIP.
- H. Refer to the expanded Purpose and Need in Chapter 3 of this document.