

LETTER #A-37  
COMMENTS

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

RESPONSES

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

September 3, 1992

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

Dear Mr. Simonson:

re: Southwest Intertie Project

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

Sincerely,

Dawn K. Lamb

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LETTER #A-38  
COMMENTS

RESPONSES

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

September 3, 1992

CHERYL LESLIE  
6920 ATRIUM  
LAS VEGAS, NV 89168

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

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re: Southwest Intertie Project

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Sincerely,



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LETTER #A-39  
COMMENTS

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

RESPONSES

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

September 3, 1992

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

Dear Mr. Simonson:

re: Southwest Intertie Project

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Sincerely,

*James E. Lytker*

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LETTER #A-40  
COMMENTS

RESPONSES

4221 West Arby Avenue  
Las Vegas, Nevada  
89118-5107

September 17, 1992

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

Dear Sir:

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

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

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

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

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Las Vegas District Office of the Bureau of Land Management (BLM) and, while the person<sup>1</sup> in charge of these reports was most gracious and helpful, access was limited to normal working hours. I recognize that these *Technical Reports* are expensive to produce, however additional

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

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

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

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

### Comments on Technical Report

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

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

C Page 9-38 Paragraph 1 is erroneous. Jedediah Strong Smith did follow the Virgin River<sup>2</sup> and he did enter present day Nevada, then Mexican Territory at about the present day town of Bunkerville and did continue down the Virgin river until it merges with the Colorado River. This is where the error begins. Smith did not travel through Nevada to the Needles area. He did cross the Colorado into Arizona and traveled around the rugged Black Canyon area one valley west of the river. Again a small point but this was the second page I read<sup>3</sup> of the only Chapter is glanced at within the technical reports. Since there were at least four books of technical reports that concerned me, (*and additional books of data tables I found uninteresting*) and I had only read a page and a half, I was getting concerned.

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

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

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

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

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

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

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

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

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E [ The thing that prompted me to return to the District Office to further review the Technical Document was was an apparent error I found on August 20, 1992 at the hearing. I thought I remembered reading about the native southern Nevada Nuwuvi<sup>4</sup> that implied that bear was an important food source and that there was a reliance on winter communal rabbit drives. I thought that the reference cited was Robert Lowie. There is no such reference in Appendix A of the DEIS/DPA. I glanced at this at the public hearing and could not relocate it that night, nor on my subsequent visit because I ran out of time before rereading that portion. I mention this because I would have liked to pursue this further.

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

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

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

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DEIS/DPA

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

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

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

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

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

RESPONSES

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

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

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

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RESPONSES

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

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

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

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

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

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

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

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I [ (CO<sub>2</sub>) by the rapid consumption of non-renewable fossil fuels may have climatic, environmental and political repercussions, I would hope that the use of Direct Current Transmission<sup>5</sup> would not be dismissed so quickly. J

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

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

<sup>5</sup>If indeed Direct Current Transmission has lower loss.

ods of power generation, and improve existing transmission systems. This would allow the postponement of this action until such technology<sup>6</sup> is commercially available.

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

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

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

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

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

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

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

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Muck around in desert with rocks in the soil and the first frost after a rain will repair the surface and erosion will not necessarily be a problem. If the desert is silt, fine sand, or whatever you have a problem. If it's coarse sand like decomposed granite you don't. All desert is not the same! Take that from a motorcycle racer who has twenty-five years experience in locating race courses where the longterm effects are negligible, and avoiding areas where the soil types invite erosion. There are portions of your proposed route that traverse sections<sup>7</sup> any responsible race promoter would avoid because they are so sensitive to surface disturbance. The dryness of the region does influence erosion. Flash flooding does

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

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

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

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

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

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

M

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

Q [ Page 4-88 The Thousand Springs Debacle has been abandoned. This was a misconceived plan much better solved with energy conservation. The fact that this is listed makes me suspicious. So does the Thousand Spring Facility Siting Area. Can I expect to see an attempt to resurrect this threat<sup>10</sup> to the best air in the our nation?

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

## Conclusion

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

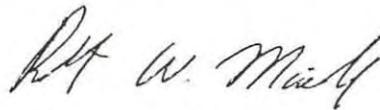
- Corridors should not automatically allow the construction of other utilities. This especially means pipelines and other surface threatening actions.
- Future utility use of these corridors should be subjected to the same judicious, environmental, cultural, and economic review.
- Whatever can be done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

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

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

Sincerely,



Robert W. Maichle

RESPONSES

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

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

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

LETTER #A-41  
COMMENTS

**KEN MILLER**

50 ALAMO  
BERKELEY, CA 94708

RESPONSES

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

Dear BLM

9/15/92

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

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

LETTER #A-41  
COMMENTS

RESPONSES

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

LETTER #A-42  
COMMENTS

September 10, 1992

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

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

Dear Sir:

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

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

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

RESPONSES

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

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

LETTER A-42

LETTER #A-42  
COMMENTS

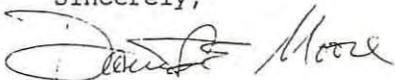
The people of Nevada now have a National Park in the Snake Range after many years of work to create this through legislation. This site was chosen over seven other areas in Nevada and Utah, because the Snake Range showed both the basin and range in a relatively pristine condition. This provides interpretive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

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

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

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

Sincerely,



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

RESPONSES

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

LETTER #A-43  
COMMENTS

Mia Mia Palmeri  
2235 Winckler Drive  
Henderson NV 89014

RESPONSES

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

September 3, 1992

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

Dear Mr. Simonson:

re: Southwest Intertie Project

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

Sincerely,

Mia Mia Palmeri

LETTER #A-44  
COMMENTS

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

RESPONSES

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

September 3, 1992

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

Dear Mr. Simonson:

re: Southwest Intertie Project

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

Sincerely, *Stella R. Quinto*

LETTER A-44