

**COMMENT LETTERS AND
RESPONSES FROM ORGANIZATIONS**

LETTER #B-2
COMMENTS

RESPONSES



September 10, 1992

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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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BOARD OF
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Re: ADDITIONAL COMMENTS on SWIP DEIS

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J.R. WILKINSON

Administrative Assistant

Dear Mr Simonson,

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.

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.

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.

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
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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.**

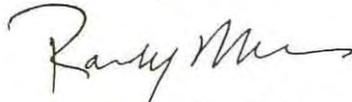
C. OTHER CONCERNS:

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?

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.

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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?

Jane 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.

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 C 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 (Olenorff, 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,

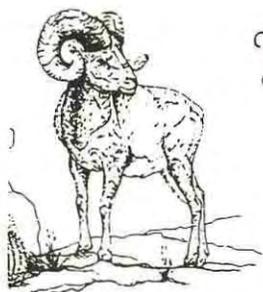


Steve Tabor - President
510 357-~~6585~~
6585



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.

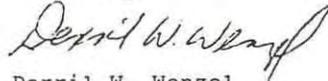
LETTER B-7

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

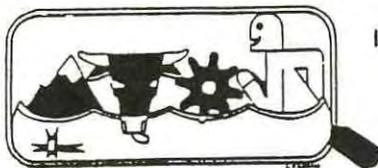
B It is not expected that the proposed access road construction will have a significant impact to the surrounding area. Any increase of access to public lands for this project will follow federal road management policies outlined in management guidelines or EISs. It is possible that new roads or roads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

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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.

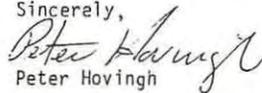
Also refer to the expanded discussion of purpose and need in Chapter 3 of this document.

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

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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.