

**COMMENT LETTERS AND
RESPONSES FROM AGENCIES**

LETTER #C-1
COMMENTS



United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202-1413

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

RESPONSES

September 1, 1992

Memorandum

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

A

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

B

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

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

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

B

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

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

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

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


Burton B. Gosling

RESPONSES

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

LETTER #C-2
COMMENTS



DISTRICT OFFICE
BURLEY, ID 83318

AUG 21 3 51 PM '92

Department of
Comprehensive Planning

RICHARD B. HOLMES
DIRECTOR

RICHARD T. BERFAB
ASSISTANT DIRECTOR

CLARK COUNTY BRIDGER BUILDING
225 BRIDGER AVENUE, SEVENTH FLOOR
LAS VEGAS, NEVADA 89155
(702) 455-4181

RESPONSES

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

August 18, 1992

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

COMMENTS ON THE DEIS/DPA FOR THE SOUTHWEST INTERTIE PROJECT

Dear Mr. Simonson:

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

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

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

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

RESPONSES

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

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

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

Sincerely,



RICHARD B. HOLMES
DIRECTOR

RBH:RG:bh
L227

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

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RESPONSES

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

Board of County Commissioners

ELKO COUNTY COURTHOUSE
ELKO, NEVADA 89801

September 10, 1992

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

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

ATTN: Mr. Karl Simonson

RE: SOUTHWEST INTERTIE PROJECT
DEIS/DPA

Dear Mr. Simonson:

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

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

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

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COMMENTS

RESPONSES



IN REPLY REFER TO:

United States Department of the Interior

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



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

L7617 (774)
DES-92/0023

9 OCT 1992

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

Dear Mr. Simonson:

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Denis P. Galvin
Associate Director
Planning and Development

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

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

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

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

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

LETTER #C-5
COMMENTS

RESPONSES

STATE OF NEVADA



DEPARTMENT OF ADMINISTRATION

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

September 22, 1992

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

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

Dear Mr. Simonson:

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

Sincerely,

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

Ron Sparks II
State Clearinghouse Coordinator

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COMMENTS

RESPONSES

BOB MILLER
Governor

STATE OF NEVADA
PUBLIC SERVICE COMMISSION OF NEVADA
REGULATORY OPERATIONS STAFF

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



TERRY PAGE
Director of Regulatory Operations

KELLY JACKSON
Staff Counsel

10 September 1992

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

Ref: EIS, Southwest Intertie Project, SAI # 93300030

Dear Mr. Sparks:

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

LETTER #C-5
COMMENTS

RESPONSES

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

Sincerely,

Thomas H. Henderson
Thomas H. Henderson
Senior Analyst



CONSUMER DIVISION:

Carson City/Reno—687-6000

•

Las Vegas—486-6550

•

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

(1) 1224

LETTER C-5

LETTER #C-5
COMMENTS



BOB MILLER, Governor

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

September 2, 1992

RESPONSES

GARTH F. DULL, Director

In Reply Refer to:

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

PSD 7.02

Dear Mr. ~~Sparks~~ :

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

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

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

Thank you for the opportunity to review this project.

Sincerely,


D. Keith Maki
Assistant Director
Planning

DKM:JD:dq

LETTER #C-5
COMMENTS

BOB MILLER
Governor

STATE OF NEVADA



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

September 10, 1992

M E M O R A N D U M

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

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

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

RESPONSES

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

LETTER C-5

A

LETTER #C-5
COMMENTS

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

RESPONSES

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

LETTER #C-6
COMMENTS

RESPONSES

A No response is necessary.

PETER G. MORROS
Director

STATE OF NEVADA
BOB MILLER
Governor

L. H. DODGION
Administrator

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



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

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane
Carson City, Nevada 89710

July 15, 1992

CLEARINGHOUSE COMMENTS

DUE DATE: September 18, 1992

TITLE: DEIS/DPA - Southwest Intertie Project

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

dl

LETTER C-6

LETTER #C-7
COMMENTS

STATE OF NEVADA

RESPONSES



DEPARTMENT OF ADMINISTRATION

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

September 22, 1992

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

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

Dear Mr. Simonson:

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

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

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

Sincerely,

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

Ron Sparks II
State Clearinghouse Coordinator

LETTER C-7

1 of 9

cc: Mike Wickersham, NDOW
Enclosure

LETTER #C-7
COMMENTS

RESPONSES



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

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

BOB MILLER
Governor

WILLIAM A. MOLINI
Director

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

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

RE: SAI NV#93300030

Dear Ron:

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

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

LETTER #C-7
COMMENTS

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

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

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

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

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

RESPONSES

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

B The Agency Preferred Alternative includes Links 673 and 690.

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

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

LETTER C-7

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COMMENTS

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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COMMENTS

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

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

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

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

RESPONSES

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

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

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

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

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

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

LETTER #C-7
COMMENTS

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

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

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

Other comments include:

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

RESPONSES

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

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

L See Response M below.

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

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

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

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

LETTER #C-7
COMMENTS

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

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

LETTER #C-7
COMMENTS

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

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

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

Additional editorial and nomenclature comments include:

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

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

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

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

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

RESPONSES

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

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

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

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

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

LETTER #C-7
COMMENTS

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

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

Sincerely,



Mike Wickersham
Manager, Region III

COP:jlh

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

RESPONSES

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

LETTER #C-8
COMMENTS



Department of Community & Economic Development
Division of State History
Utah State Historical Society

Norman H. Bangert
Governor
Max J. Evans
Director

300 Rio Grande
Salt Lake City, Utah 84101-1182
(801) 533-5755
FAX: (801) 364-6436

June 22, 1992

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

RE: Southwest Intertie Project DEIS/DPA

In Reply Please Refer to Case No. L037

Dear Mr. Simonson:

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

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

RESPONSES

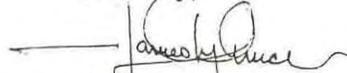
- A If the project is approved for construction, subsequent cultural resource studies will be pursued in consultation with State Historic Preservation Officers. This will be an opportunity to review the requirements of state antiquities laws to ensure that state requirements are met in any situations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

LETTER #C-8
COMMENTS

- F [6. Graphics or tables would have been of use when explaining the models used for the site prediction models and effect. They would help in following how each was constructed.
- G [7. One key item is the review of the results of the models and their representation on the cultural resource maps with the DEIS. In Utah, Panel 4 used site information to outline impact levels, known resources and predicted sensitive zones. In discussion with the State Archaeologist, the model does not outline what would be several high sensitive zones. One example is where lines cross to the northeast of Sevier Lake; an area containing very complex sites with little known about what information they contain. These are only models and as stated are intended to provide some assistance in picking alternatives. The models on Panel 4, however, appear not to provide a good prediction of sensitive zones. Models could use more environmental data to develop better predictions.

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

Sincerely,



James L. Dykman
Regulation Assistance Coordinator

JLD:L037 BLM/EIS

RESPONSES

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

LETTER #C-9
COMMENTS



OFFICE OF PLANNING AND BUDGET
Resource Development Coordinating Committee

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

116 State Capitol
Salt Lake City, Utah 84114
(801) 538-1027

September 23, 1992

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

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

Dear Mr. Simonson:

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

A

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

RESPONSES

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

LETTER C-9

LETTER #C-9
COMMENTS

RESPONSES

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

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

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

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

LETTER #C-9
COMMENTS

RESPONSES

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

Sincerely,



Brad T. Barber
State Planning Coordinator

BTB/rpj

LETTER C-9

LETTER #C-10
COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

September 16, 1992

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

Dear Mr. Simonson:

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

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

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

LETTER C-10

LETTER #C-10
COMMENTS

RESPONSES

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

Sincerely,

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

Deanna M. Wieman, Director
Office of External Affairs

LETTER #C-10
COMMENTS

Southwest Intertie Project DEIS
EPA Comments: September, 1992

RESPONSES

Water Quality

A [1. In May, 1991, EPA published the Proposed Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters ("Guidance") pursuant to Section 6217(g) of the Coastal Zone Reauthorization Amendments of 1990. Although the Southwest Intertie Project (SWIP) is not in the coastal zone, the best management practices discussed in the Guidance are equally applicable to nonpoint source pollution control of inland waters as well. We recommend that the project sponsors consider this Guidance during construction and operation/maintenance of the SWIP. For your information, EPA expects to publish a final guidance for nonpoint source pollution in October, 1992. You may wish to contact Jovita Pajarillo of EPA Region 9's Water Quality Branch at (415) 744-2011 to obtain a copy of the guidance at that time.

B [2. According to the DEIS, batch plants would be located every 20 to 30 miles along the right-of-way (ROW). The FEIS should ensure that batch plants would not be sited near streams, springs, or other sensitive areas, whether on public or private land. Best management practices (BMPs) for operations at batch plants should be provided in the FEIS.

C [3. Material stockpiles, borrow areas, access roads, and other land-disturbing activities should be located away from critical areas such as steep slopes, highly erodible soils, and areas that drain directly into water bodies. Siting criteria for stockpiles should be included in the FEIS.

D [4. The FEIS should discuss requirements for stream crossings by transmission lines. For example, is there a minimum setback objective for tower placement near streams?

Wetlands

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

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

A Your suggestion is noted and the BLM will consider these guidelines during the preparation of the Construction, Operation, and Maintenance (COM) Plan. For more information regarding the COM Plan refer to page 1-34 of this document.

B The BLM agrees that a list of Best Management Practices is a good idea for the batch plants. This will be done once the specific needs are better defined in the COM Plan. The construction methods will be evaluated in the COM Plan (refer to page 1-34 of this document).

C The BLM agrees that material stockpiles and other disturbed areas be located away from sensitive resources. When the engineering design is in progress (during the COM Plan) the specific needs of the project will become more clear and the construction methods will be addressed. The siting criteria will be outlined in this document.

D The BLM agrees that the SWIP FEIS/PPA should describe a minimum distance for a tower site from a stream crossing. The minimum distance is 200 feet. This correction to Table 4-1 (of the SWIP DEIS/DPA) is corrected in the Errata in Chapter 4 of this document.

E Since the SWIP would be capable of spanning 1/4 mile between tower sites, the BLM does not believe that any wetlands would be impacted on the Agency Preferred Alternative. The SWIP, if approved, will fully comply with the Section 404(b)(1) Guidelines (40 CFR 230) of the Clean Water Act as indicated in Table 1-1 of the SWIP DEIS/DPA.

F The BLM agrees that the preferred SWIP alternative would be the least environmentally damaging practicable alternative available to achieve the project purpose and need. The BLM anticipates that no acres of wetlands or other waters of the U.S. will be filled as a result of the SWIP. Existing roads will be used to the degree possible for construction access. No roads will be permitted to cross riparian areas, live streams, or wetlands unless there is absolutely no good alternative, and a 404 Permit is obtained.

LETTER #C-10
COMMENTS

RESPONSES

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

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

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

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

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

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

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

LETTER #C-10
COMMENTS

Vegetation and Biodiversity

J 1. The FEIS should indicate how many acres of riparian vegetation would be permanently and temporarily lost as a result of the SWIP and discuss mitigation requirements for these losses. The FEIS should discuss the revegetation procedures required in areas temporarily disturbed during construction. For riparian habitat permanently lost, we recommend full in-kind replacement of habitat.

K 2. We recommend that additional measures to ensure protection of existing sensitive vegetation and/or habitats be required during construction, such as fencing and tree armoring.

K Since topsoil is essential to establish new vegetation, it should be stockpiled and then reapplied to the site for revegetation where possible. Stockpiles should be stabilized to prevent water and wind erosion. Although topsoil salvaged from the existing site can often be used, it must meet certain standards and topsoil may need to be brought onto the site if the existing topsoil is not adequate for establishing new vegetation.

L 3. Mitigation measure #4 in Table 4-1 provides for reseeding if required. Under what conditions would reseeding not be required? Would reseeding be required on all public lands temporarily disturbed by the project? The FEIS should include detailed procedures for revegetation as well as the monitoring plan and success criteria that would be used to ensure successful revegetation of all land temporarily disturbed by the project. The FEIS should indicate who would be responsible for such monitoring and any necessary subsequent mitigation.

M 4. The FEIS should discuss how hardpan soils, desert pavement, and other soils that are habitat for specialized plant species would be excavated and reclaimed. Avoidance, minimization, and/or mitigation of impacts to these communities should be addressed.

N 5. The DEIS indicates that public use of access roads could adversely affect sensitive biological resources. The FEIS should provide for mitigation of these impacts by restricting public access where necessary to protect sensitive populations and watersheds and highly erodible soils.

RESPONSES

J The BLM does not anticipate any loss of riparian vegetation or habitat as a result of the construction or operation of the SWIP.

K The BLM agrees that more is needed. The SWIP EIS process is intended to facilitate decision making on whether or not the project should be built, and if so, which route will be selected. Additional work will need to be done during the COM Plan to detail the rehabilitation methods and many other aspects of the project (refer to page 1-34 of this document). In all cases the BLM will monitor the success of the restoration efforts.

L In some cases in desert restoration the natural seed sources within the stockpiled topsoil provide the necessary revegetation. Additional seeding will likely be required by the BLM in all cases except where there is no vegetation currently (e.g., playa areas). Refer to Response K above.

M The BLM agrees that additional work would need to be done for the specific methods to construct, operate, and maintain the SWIP. Along with rare plant surveys, cultural clearance, etc. that will be done following selection of the final route, the rehabilitation plans will be detailed and specific. The engineering of a final centerline will continue to have some siting flexibility, as stated in the SWIP DEIS/DPA. This detailed engineering will be done in conjunction with the surveys mentioned above in order to minimize disturbance to resources (e.g., wetlands, riparian areas, live streams, cultural resources, rare plant populations, etc.).

N This has been recommended as mitigation and will be done (refer to Table 4-2, #4 of the SWIP DEIS/DPA).

LETTER #C-10
COMMENTS

Jurisdiction

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

Hazardous Materials

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

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

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

EC-Environmental Concerns

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

EO-Environmental Objections

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

EU-Environmentally Unsatisfactory

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

RESPONSES

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

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

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

LETTER #C-10
COMMENTS

RESPONSES

Adequacy of the Impact Statement

Category 1-Adequate

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

Category 2-Insufficient Information

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

Category 3-Inadequate

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

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

LETTER #C-11
COMMENTS

RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240



ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

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

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

Dear Mr. Simonson:

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

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

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

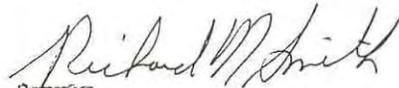
Based on the above concerns, the Service recommends that a revised DEIS be prepared, and circulated for agency review.

LETTER C-11

LETTER #C-11
COMMENTS

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

Sincerely,



DIRECTOR

SPECIFIC COMMENTS ON SOUTHWEST INTERTIE PROJECT

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

Generic Mitigation Measures Included in the Project Description:

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

Selectively Committed Mitigation Measures:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Z [Page 4-48 to 4-50, Habitats of Special Concern: Nevada: This section discusses the major raptor migration corridor along the west side of the Goshute Mountains, and bald eagle winter range in Elko and White Pine Counties. Although raptor power line collisions may not be a serious problem overall, collisions may be more likely in strong winds or poor light conditions in areas with high raptor concentrations. Specific mitigation measures to reduce the potential for such collisions in these areas could include prohibition of construction of transmission lines within 1 mile of communal raptor roosts or high use areas.

AA [Pages 4-58 to 4-67, Impact Assessment and Mitigation Planning: Our review indicates that the impact assessment did not consider areas important to migratory birds, important riparian areas, and areas of shallow ground water that may qualify as wetlands and provide important habitat for wildlife. Such areas should be evaluated in determining the environmentally preferable alternative.

V The BLM acknowledges the potential presence of *Charadrius alexandrinus nivosus* as a nesting species on alkali flats within the SWIP study corridors. Your recommendation of preconstruction surveys for this species are well taken and will be included in the COM Plan for the project (refer to page 1-34 in this document). The BLM has also expanded its discussion of this type under Other Natural Land Cover, in Chapter 3 of the SWIP FEIS/PPA.

W Shallow ground water areas such as playas and salt flats do not qualify as jurisdictional wetlands if not vegetated (COE, 1987, Wetland Delineation Manual). In any case, such areas will be avoided whenever possible or spanned by proper tower placement (see item 6, Table 4-2 of the SWIP DEIS/DPA). Smaller springs which occur along this link are neither indicated on maps nor are evident on Landsat imagery, but are mentioned in the text, and will need to be considered during the COM Plan. Refer to Earth Resources in Volume II of the technical reports (refer to Appendix H for locations where the technical reports can be reviewed).

X As with *Charadrius alexandrinus nivosus* above, recommendations for field surveys for potential habitat of *Brachylagus idahoensis* along the Agency Preferred Alternative will be included in the COM Plan for this project (refer to page 1-34 in this document). The BLM will also consult with range experts regarding the potential for revegetation of dense, tall sagebrush areas that are preferred habitat for the species.

Y The page number cited references the Natural Environment (Volume II) of the Technical Report. Wetlands are defined by the Corps of Engineers (1987) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." This definition will apply to areas that are included as riparian, and in some cases, shallow ground water. This definition will be added to the Errata in Chapter 4 of this document.

Z Refer to the discussion of Avian Collision Hazard in the biological resource sections in Chapter 3 of this document.

Collisions (and electrocution) involving high voltage lines are very infrequent, highly random events that are unlikely to affect the long term probability of

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- The section on ground disturbance impacts on page 4-61 states that nests of some ground-nesting species of songbirds would be affected by construction activities. Mitigation measures should be developed to ensure avoidance of this impact.
- AA The section on ground disturbance impacts on page 4-72 states that sensitive plants near construction sites may be trampled, but they may recover depending on the extent of disturbance. This impact is fully preventable through pre-construction surveys and implementation of protective measures such as temporary fencing during construction. Such techniques should be included under mitigation measures.

- Technical Report: Data Tables for Natural Environment: The Service identified several discrepancies between the Data Tables and the text of the DEIS. They are as follows:
- BB Ground Disturbance Impacts to Sensitive Plant Species: Page 4-15 of the text identifies the sensitive plant, Arabis falcifruca, as being found along link 162; Penstemon bicolor, P. b. roseus, and Astragalus triquetrus could occur along links 690, 700, and 720; and Mentzelia mollis occurs along link 700. However, this information needs to be included in the table.
- Public Access Impacts to Sensitive Plant Species: Page 4-15 of the text states that Castilleja salsuginosa is found near Monte Neva Hot Springs and could be affected by future public access to this area. This factor is not reflected in the table.

- Chapter 5, Consultation and Coordination, Page 5-15:
- CC The most recent threatened and endangered species list for the proposed project in Idaho is dated July 18, 1991. This species list is no longer valid and, according to Federal Regulations, should be updated within 180 days of project construction. Species lists should be current for project proposals in Idaho, Nevada, and Utah. A list of Service field office contacts for updating and obtaining species lists follows.

survival of any species of raptor within the SWIP corridors. There may be some raptor mortality associated with the presence of new transmission lines in the SWIP system. The BLM's professional opinion, which is supported by the scientific literature, however, is that the level of increased mortality likely to occur will not be measurable and will not adversely affect the population status of any raptor species. The annual mortality of raptors from illegal shooting in western Utah and eastern Nevada is probably far higher than would be experienced in a decade or two of presence of the SWIP transmission lines.

- AA The BLM will discuss compliance with the Federal Migratory Bird Treaty Act as it applies to songbirds during preparation of the COM Plan for this project (refer to page 1-34 in this document). Consultation will take place with the Fish and Wildlife Service and state wildlife management agencies regarding this issue.

Preconstruction surveys for individuals and populations of sensitive plant species will be included in the COM Plan for the project (refer to page 1-34 in this document). The BLM agrees that impacts to such species are almost fully avoidable. The BLM believes that preconstruction surveys coupled with construction period compliance monitoring can serve this end.

- BB There is one population of Arabis falcifruca known within the one-mile corridor for Link 162 which should be on the Table. The population of Mentzelia mollis was incorrectly identified. Astragalus triquetrus is the only species which occurs within the one-mile corridors of Links 790, 800, 830, and 840. The two species of Penstemon are known to occur within the vicinity of the proposed Dry Lake substation, but not within the mapped one-mile corridor.

Information provided to use stated that Castilleja salsuginosa occurred in the vicinity of Monte Neva Hotsprings, but did not have an exact location. Therefore, this was not mapped although its existence was noted in the text.

- CC The Boise, Reno, and Salt Lake offices of the Fish and Wildlife Service were contacted on the 14th and 15th of October 1992 with regard to updated lists for threatened and endangered species, as well as species proposed for listing as threatened or endangered.

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COMMENTS

Contacts for Updating Species Lists

U.S. Fish and Wildlife Service
Boise Field Office
4696 Overland Road, Room 576
Boise, ID 83705
(208) 334-1931

U.S. Fish and Wildlife Service
Reno Field Office
4600 Kietzke Lane, Bldg. C-125
Reno, NV 89502
(702) 784-5227

U.S. Fish and Wildlife Service
Salt Lake City Field Office
1745 W. 1700 S., 2060 Admin. Bldg
Salt Lake City, UT 84105-5110
(801) 524-5630

Literature Cited

- Army Corps of Engineers, 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1.
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. Report FWS/OBS-79/31. Office of Biological Services, Fish and Wildlife Service, Washington

RESPONSES

The list of threatened and endangered species for this project will be updated prior to construction. Our contacts with the Fish and Wildlife Service indicate that no new species, except a plant, Ute Lady's Tresses (believed extirpated from Nevada), have been listed in the study area since the original letters and species lists were provided for this project. The Fish and Wildlife Service has rendered a favorable Biological Opinion for the project (refer to Appendix C of this document).

LETTER #C-12
COMMENTS

John A. Chachas
Julio C. Costello
Bunny Hill
John S. Lampros
Barlow N. White

RESPONSES

P.O. Box 1002
Ely, Nevada 89301
(702) 289-8841

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

White Pine County
Board of County Commissioners

September 14, 1992

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

Dear Mr. Simonson:

On behalf of the White Pine County Commission, I would like to thank you for the opportunity to respond to the Draft Environmental Impact Statement and Plan Amendment for the Southwest Intertie Project. The Commission endorses the proposed project because we feel it will be beneficial to White Pine County and its residents. The Southwest Intertie Project will provide jobs and encourage business activity during construction, it will generate tax revenue, and it will contribute to the transmission system needed for the White Pine Power Project.

The White Pine Power Project is a significant element in the county's efforts to diversify its economy and provide jobs for its residents. The Southwest Intertie Project will result in construction of transmission lines as well as a sub-station near Ely, both of which will enhance the future development of the White Pine Power Project.

LETTER #C-12
COMMENTS

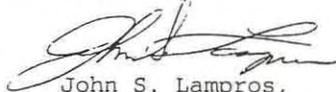
RESPONSES

At our September 9 County Commission meeting, we reviewed concerns raised by some residents of Baker who feel that the Agency Preferred Cross Tie Route to Delta, Utah, negatively impacts the

Great Basin National Park and residents of the Snake Valley area. The Commission would like to ask these concerns be taken into account in the final selection of the cross tie route as well as mitigation of the visual impacts of the transmission line and the placement of the individual towers.

Thank you for your consideration.

Sincerely,



John S. Lampros,
Chairman