

**COMMENT LETTERS RECEIVED AFTER  
THE SWIP DEIS/DPA COMMENT PERIOD**

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LETTER #D-1  
COMMENTS

RESPONSES

A No response is necessary.



January 7, 1993

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

Southwest Intertie Project  
Environmental Impact Statement

Dear Mr. Simonson:

Deseret Generation & Transmission Co-operative (Deseret) supports the Southwest Intertie Project (SWIP). Currently, Deseret's generation export capabilities are at their limit. Due to this constraint we are not able to sell electricity to potential purchasers to meet their load growth.

As a participant in the Utah-Nevada Transmission Project, the SWIP will interconnect and provide a valuable additional path to potential customers.

LETTER D-1

LETTER #D-1  
COMMENTS

RESPONSES

If you have any questions or would like further comments, please contact me at (801) 566-1238.

Sincerely,

  
Merrill J. Millett  
General Manager and CEO

dph

cc: Dennis B. Whitney  
Los Angeles Department of Water and Power  
Room 1149  
P.O. Box 111  
Los Angeles, California 90051-0100

Jan Packwood  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707

*"Creating Power Through Cooperation"*

LETTER #D-2  
COMMENTS

RESPONSES

Dear Sir:

8 October 1992

I am writing in support of the "No Action" alternative for the Southwest Intertie Project.

A [ The project will hideously bespoil extensive areas and vistas without a definite need to do so. The negative impacts to wildlife and Great Basin National park, a favorite of mine, cannot be justified for this project.

Please put me on your mailing list for information on the project.

Sincerely,  
Frank B Guros

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

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

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

LETTER #D-3  
COMMENTS

Sacred Datura, Zion National Park, Utah.

Dear Mr. Simmons,

A [ I ask you to please  
re-consider the need for the  
Idaho to L.A. powerline project.  
If indeed a justification exists,  
then please use the existing  
powerline right-of-way in Utah.

B [ A new, major power line through  
an unspoiled area will have  
devastating impact on raptor migration,  
tortoise populations, visual appeal,  
archaeological sites, etc., etc.  
Thank you for your consideration.

Mark Lindberg  
8 Eden Lane  
Larkspur, CA 94939

From The Sierra Club Nature in Close-Up Postcard Collection.  
Photograph copyright © 1988 Kevin Hass.



RESPONSES

- A Please refer to Chapter 3 of this document for an expanded discussion of the purpose and need.
- B Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission line proposed for the SWIP would utilize V-guyed steel lattice, self-supporting steel lattice, and tubular steel H-frame towers. The spacing between conductors on towers is sufficient to prevent phase-to-phase or phase-to-ground contact. Conductors are hung on towers in such a manner that they are 23 to 32 feet apart. Further, conductors are hung on insulating systems that will be 14 to 20 feet in length depending on tower design (refer to the SWIP DEIS/DPA pages 2-12 through 2-14). Because of the distance between conductors and the tower, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the tower.

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

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

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

There would be significant visual impacts to the scenic natural landscapes of public lands. Visual impacts were assessed using a model based on the criteria of the BLM's Visual Resource Management (VRM) System. The VRM System tends to focus on impacts to sensitive viewpoints. Although

LETTER #D-3  
COMMENTS

RESPONSES

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

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

LETTER #D-4  
COMMENTS

October 7, 1992  
Karl Simonson  
Bureau of Land Management  
Burley District Office  
Route 3, Box 1  
Burley, Idaho 83318

RESPONSES

cc: Manuel Lujan  
Ly-Jamison A

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

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

Dear Mr Simonson,

Please add these comments as part of the final E.I.S. for the Southwest Intertie Project.

A If the SWIP is allowed as proposed, it would require giant steel towers every 1,500 feet, which would be visible from many viewpoints within Great Basin National Park. The area's beauty relies on the scenic views and habitat for tortoise, antelope and sage grouse.

I urge you to oppose the BLM proposed action and support the "no action" alternative.

This alternative would have no adverse environmental impacts and would include eliminating financial costs.

LETTER D-4

LETTER #D-4  
COMMENTS

RESPONSES

It has come a time, where Americans need to use  
conservation as a means of meeting our needs,  
and stop depleting our natural beauties - our  
public lands. Thank you for your consideration.

Sincerely,

Kimberly Martinez  
3980 Frandon Court  
Simi Valley, California 93063

LETTER #D-5  
COMMENTS

RESPONSES



IN REPLY REFER TO:  
L7617(774)  
DES-92/0023

United States Department of the Interior

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



30 MAR 1993

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

Dear Mr. Simonson:

This is a follow-up to our comments, contained in our letter of October 9, 1992, on the Draft Environmental Impact Statement and Proposed Plan Amendment for the Southwest Intertie Project (SWIP). These follow-up comments respond to issues raised at your project steering committee meeting, held in Salt Lake City, Utah, December 9-10, 1993, and attended by Superintendent Al Hendricks of Great Basin National Park and Western Regional Office Environmental Coordinator Jim Huddleston, and your request for comments on the preliminary final environmental statement and subsequent redraft of the Purpose and Need section of that document. In addition, we are responding to your more recent consideration of an alternative alignment to the 230 kilovolt (kv) route in the vicinity of Great Basin National Park.

We appreciate the fact that the Bureau of Land Management and the involved power companies are willing to consider a modification of the 230 kv corridor that would move the proposed transmission line northward in the vicinity of the park. While we continue to have serious reservations over selection of the 230 kv corridor as the preferred routing, we are hopeful that this potential modification would result in the reduction of visual impact to the park. We will withhold further comment and any endorsement of this modification pending availability and our review of more detailed plans for the modification.

LETTER #D-5  
COMMENTS

During the aforementioned steering committee meeting, our attendees mentioned the fact that our comment letter of October 9, 1992, did not appear in the preliminary final document. It was their understanding that you did not plan to publish letters of comment from cooperating agencies. We believe this would be a procedural error in violation of the Council of Environmental Quality Guidelines at 40 CFR Part 1503.4(b). Even though you informally provided us responses to our comments and made some modifications in the draft final environmental statement in response to those comments, we believe it necessary and proper to include the comments and associated responses in the final document.

Our review of the January 15, 1993, revision of the Purpose and Need section indicates that while there is some improvement over that presented in the draft environmental statement, the revision primarily involves the reorganization of earlier material, with certain key words being changed, and large portions which remain substantially unchanged. Our primary objection is that a tone of justification for the SWIP project remains. For example, statements frequently appear that indicate what the SWIP would do to fill needs identified in this section. The function of this section should be an impartial description of circumstances that cause the proposed action and alternatives to be considered. How well the SWIP, specifically, will meet the identified needs, is more appropriately discussed in the alternatives section. If this guideline were to be followed, the content of the Purpose and Need could be greatly reduced.

Other comments on specific sections of the Purpose and Need redraft are as follows:

- A [ 1. On page 3-1, Line 4, we believe that the information printed here is an expansion of the Purpose and Need described in the Summary, not Chapter 1.
- B [ 2. On page 3-3, under Diversity Benefits from Interconnections, paragraph 2, second sentence, the "1992 National Energy Policy Legislation" is cited as specifically addressing transmission and transmission access. This implies that the legislation relates in some way to the Purpose and Need of SWIP. If there is some specific relationship between the legislation and SWIP, it should be stated. If there is not, the reference should be omitted.
- C [ 3. On page 3-5, under Environmental and Consumer Benefit Tests paragraph 1, final sentence, NEPA is the National Environmental Policy Act.
- D [ 4. On Page 3-9, the entire Regional Economic Benefits of SWIP section is an example of material more appropriately covered under the alternatives and/or environmental consequences sections than in this section.

RESPONSES

- A The document correctly states that the information on Purpose and Need presented in the FEIS/PPA is an expansion of the Purpose and Need in Chapter 1 of the DEIS/DPA.
- B There is no specific relationship between the SWIP and the "1992 National Energy Policy Legislation". The sentence in paragraph 3 and other references to it have been removed from the SWIP FEIS/PPA.
- C This has been corrected in the SWIP FEIS/PPA.
- D The BLM believes that the information presented on economic benefits of the SWIP is appropriate information for the Purpose and Need.

LETTER #D-5  
COMMENTS

RESPONSES

E 5. On page 3-11, under Bonanza Generating Station, second paragraph, it is implied that the SWIP needs to be constructed in order to make the Bonanza Generating Station profitable. The fact that all 400 megawatts (MW) of Bonanza's generating capacity must be sold to meet operating costs is the concern of Deseret Generation and Transmission Cooperative, and not SWIP. Further, it is implied that a second 400 MW generation unit could be built at Bonanza if transmission links could be developed. This would be an additional impact of the SWIP project that has not been covered in the environmental analysis.

The following specific comments are directed to the December 1992 preliminary draft of the Final Environmental Impact Statement.

F 1. We continue to be concerned with and question the rationale behind the contention, on page 3-54 of the document under Leland Harris Spring Complex, that "The presence of this spring complex near the Direct Route was a factor in not considering the Direct Route as a preferred crosstie route of the SWIP." During the December 1992 steering committee meeting, the consulting firm of Dames & Moore's biologist stated that their review of the situation indicated that transmission towers could be sited in a way that completely avoids the riparian areas in the vicinity of Leland-Harris Spring. Furthermore, their review, substantiated with color slides taken at the spring complex, revealed an area which had been heavily used by livestock with most available forage consumed up to the edge of the springs and ponds. Accordingly, we question potential biological impact of the powerline on this complex as being a significant factor in either rejecting the Direct Route as the preferred alternative or at least not designating it as the environmentally preferred alternative.

G 2. Based on concerns expressed throughout the review process on this project, we have concluded that there has not been sufficient information or supportable conclusions to select the 230 kv route as the project proposal. Therefore, we recommend its rejection in favor of either more intensive study of the Direct Route or selection of the no action alternative. Accordingly, we recommend that the last sentence on pages 1-5 of the preliminary final document be revised to read: "Because of concern for visual impacts to the park and to visitors driving to the park, the National Park Service recommends rejection of the 230 kv route."

H 3. Hagerman Fossil Beds National Monument is incorrectly identified on Figures 1-1, and 1-2, as well as in Appendix C, page 2.

I 4. On page 3-56, first paragraph the superintendent of Great Basin National Park is mentioned specifically as the source of a particular proposal. Personal sources are not identified elsewhere throughout the document and agency sources are rarely noted. If this specific attribution is believed significant in this instance, then the National Park Service, not the superintendent, should be cited as the source.

E The section describing the Bonanza Generating Station has been rewritten, refer to this section in the Purpose and Need in Chapter 3.

F The impacts to Leland-Harris Spring Complex have been lowered to moderate reflect findings of Dr. Linwood Smith. The direct impacts of the SWIP through this area could be largely mitigated. However, the BLM remains concerned that even a small impact could cause the species of concern to "go over the edge". For this reason, the cumulative effect remains significant. Refer to the Leland Harris Spring Complex section under Biological Resources in Chapter 3 on page 3-91 describing the potential impacts to the Leland-Harris Spring Complex.

Although the Leland-Harris Spring Complex was considered it was not the determining factor in the selection of the environmentally preferred route. The impacts to the military flight operations in the R-6405 Restricted Area are what made the Direct Route less environmentally favorable. Although moderate, these impacts would be extensive (approx. 65 miles) and were considered significant.

G Your comments relative to rejection of the 230kV Corridor Route will be considered by BLM in their final decision. The wording you have suggested has been incorporated into this document.

H This has been corrected in the FEIS/PPA.

I This has been corrected in the FEIS/PPA.

LETTER #D-5  
COMMENTS

RESPONSES

- J 5. On page 4-8, this errata section relating to page 3-3 of the AFFECTED ENVIRONMENT remains inaccurate. Only those national parks and wilderness areas which were in existence in 1977 were designated Class I. Neither Great Basin National Park, nor Mount Moriah Wilderness Area fall into this category. The Jabidge Wilderness area did exist in 1977, and is Class I. Areas initially designated as Class II, can be redesignated as Class I, either by Congress through additional action, or by the State legislatures in the affected States. In addition, the correct size of Great Basin National Park is 77,100 acres.
- K 6. In Figure 4-4, the California National Study Trail is now designated as the California National Historic Trail. In Figure 4-12, the diagram showing the inset location on panel 3 is improperly located.
- L 7. It is our understanding that the Final EIS/PA is in an abbreviated format, which therefore references the information included in the draft document. As such, we request an addition to the information which was presented in the draft, which will address the matter of relative impacts anticipated on each of the alternative routes. Specifically, on page 4-70 and 4-71 of the June 1992 draft, a summary of anticipated cultural resource impacts for each of the routes was presented, along with an explanation of how these figures were derived. We find these figures to be most illustrative and revealing, and request that the figures developed for each of the five resource categories evaluated (Cultural, Biology, Land Use, Earth, and Visual), be presented in a single chart showing the various alternatives.
- M 8. By letter of February 11, 1993, to Jake Hoogland, Chief, Environmental Quality Division, Dames & Moore requested clarification on the status of the Antelope Springs Trilobite Beds. By Memorandum of Understanding dated May 8, 1988, the Bureau of Land Management and National Park Service set forth procedures for evaluating potential impacts on designated or potential National Natural Landmarks (NNL). The Antelope Springs Trilobite Beds are a potential NNL. Our review of the draft environmental statement indicated that the 230 kv route would pass through the central to southeast portion of the potential NNL. Therefore, we requested that this potential impact be addressed along with any needed avoidance or mitigation measures in the final document. For further information on this specific concern, please contact Cheryl A. Schreier, the NNL coordinator for our Rocky Mountain Region, at (303) 969-2850 or National Park Service, Rocky Mountain Region, 12795 West Alameda Parkway, Box 25287, Denver, Colorado 80225.

- J This has been corrected in the FEIS/PPA.
- K This has been corrected in the FEIS/PPA.
- L The cultural resources for each alternative are at best predicted, since no "on-the-ground" surveys were conducted to compare alternatives for the EIS process. Surveys will be conducted on the selected alternative.
- The cultural scoring model for each alternative used an index which was unique for cultural resources and was not used to determine route preferences for the other disciplines. It is based on the study team's concerns about the unknowns of cultural resources and the potential for mitigation.
- The basis of comparison for each of the disciplines was the miles of high, moderate, and low impacts, which represents the level of impact significance for each of the resources potentially affected. This information is presented in detailed comparative form for the five resource disciplines in Tables 1-1 and 1-2 of the FEIS/PPA for all of the alternative routes as you suggested.
- M Refer to the Antelope Spring Trilobite Beds section in Chapter 3 of this document.

LETTER #D-5  
COMMENTS

RESPONSES

In summary, we believe that the preliminary final document continues to fail to provide factual information to support the selection of the 230 kv corridor. Also, the Purpose and Need section sets an improper tone for an objective analysis. In addition, the late introduction of a possible modification in the 230 kv corridor near Great Basin National Park now becomes a critically needed addition to the document in order to demonstrate that all reasonable alternatives have been considered.

For any questions on the above comments, please contact Jake Hoogland, Chief, Division of Environmental Quality, at (202) 208-5214; Superintendent Al Hendricks at (702) 234-7331; or Jim Huddlestun, Western Regional Office, at (415) 744-3968.

Sincerely,



Denis P. Galvin  
Associate Director,  
Planning and Development

LETTER #D-6  
COMMENTS

RESPONSES

Burling Mastuit Office  
BLM

Attn: 3, Box 1

Burling, Idaho, 83318

Re: SWIP Corridor Route

Nov. 1, 1982

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

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

A [ The preferred alternative for the corridor route near Great Basin National Park would degrade the vistas of Mount Wheeler and the Snake Range from outside the park and spoil views of the valleys from the park's mountain sides.

LETTER #D-6  
COMMENTS

RESPONSES

Besides it is a great waste of  
Taxpayers money adding to the deficit.

Sincerely  
John Lawrence  
74 Middle Ave.  
Station Island  
NY 10308

LETTER #D-7  
COMMENTS

RESPONSES

**Sierra Pacific Power Company**  
*Your Energy People*

A No response is necessary.

Thomas D. Parker  
Vice President  
Electric System  
Planning & Engineering

January 15, 1993

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

**RE: Southwest Intertie Project  
Environmental Impact Statement**

Dear Mr. Simonson:

We understand that it is beyond the comment period for the draft EIS. However, we at Sierra Pacific Power Company (Sierra) feel it necessary to apprise you of the electrical transmission situation into Northern Nevada.

Currently, Sierra's bulk electric transmission capabilities are nearing capacity. Due to this constraint, without additional transmission facilities (such as SWIP), potential suppliers of capacity and energy to meet our current and growing customers needs for electric power must be internal to Sierra's control area.

Participation agreements for SWIP have not been finalized and it is uncertain whether Sierra will have any ownership in SWIP. However, SWIP will be using an important State of Nevada transmission corridor. SWIP 's utilization must be evaluated for the optimum use of this corridor. Sierra is interested in interconnecting with SWIP in two locations. One is with an open market 230 kV interconnection in the Ely, Nevada area, the other is a future site at 345 kV identified as the substation/series compensation siting area located Northeast of the Wells, Nevada area. This will allow Sierra to conduct economical energy transactions that would benefit our customers.

LETTER #D-7  
COMMENTS

RESPONSES

If you have any questions or would like further comments, please contact me at 702-689-4569.

Sincerely,



Michael R. Smart, Director  
Electric Planning

MRS:lj

cc: Dennis B. Whitney  
Jan Packwood

LETTER #D-8  
COMMENTS

SHILOAH COMMUNITIES, INC.  
1100 Circle Dr., Eskdale, UT 84728-9702

BUREAU OF LAND MANAGEMENT  
RECEIVED

JUN 10 1993

June 10, 1993

Nancy DeMille  
BLM  
Fillmore, UT 87776  
FAX (801)743-5112  
Office: (801)743-6811

Dear Ms. DeMille,

	INFO.	ACTION	INITIAL
Water Springs A.M.	_____	_____	_____
House Range A.M.	_____	_____	_____
Operations Division	_____	_____	_____

We've discussed our concerns about the impact that the ~~proposed~~ construction of the new power lines for the Intertie project will have on our lives, homes, and business. Basically the concerns can be summarized into three areas.

A Our first concern is the increased limitation of future land development in the proposed corridor for the power line. The proposed corridor separates our properties and the expanded use of the corridor restricts any further utilization of the land connecting our properties.

B Secondly, there are many concerns about the health hazards surrounding high tension power lines and while these lines do not pass over any of our homes or buildings, our daily activities have us passing under them frequently. We understand that adverse health effects are not yet proven but should they be substantiated then we would be better off to not increase our risk when other options are available and viable.

C Our third concern is about the congestion of power lines in our back yard. Again, when other options are feasible for the line our preference is to select those other options rather than to fill our country side with visually offensive power lines.

No one here favors the proposed construction of the Intertie project, but especially not in the proposed area adjacent to our property. Our recommendation is that the BLM show adverse impact from the construction of the power line in our area.

Sincerely,

Dean G. Hayward

RESPONSES

- A Impacts have been assessed for all developments and planned developments in the SWIP project area, however, impacts on future developments cannot be assessed in an area which does not have a plan for development. Your comments have been noted and will be considered in the BLM's decision process.
- B The many studies that have been conducted on EMF demonstrate that we are all affected in everyday life. Electromagnetic fields exist from microwaves, florescent lights, waterbed heaters, hair dryers, etc. The right-of-way width of 200 feet is intended to minimize these effects. Outside of the right-of-way the field levels are expected to be no higher than normally occur in household appliances. Please refer to pages 3-72 through 3-82 in the DEIS/DPA and page 3-19 in this document for additional information on EMF.
- C Your comments have been noted and will be considered in the BLM's decision process.