

LETTER #B-9
COMMENTS



RUSSELL D. BUTCHER
Southwest-&-California Representative

August 12, 1992

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

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

Dear Mr. Simonson:

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

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

RESPONSES

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

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

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

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

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

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

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

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

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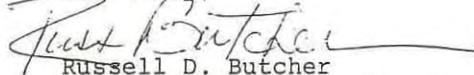
even a third 500kV transmission line will be proposed to expand the capacity of the Crosstie (again assuming that the Crosstie can be justified in the first place).

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

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

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

Sincerely,



Russell D. Butcher
Pacific Southwest Regional Director

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

RESPONSES

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

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

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

WINNERS:

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

Founded 1958

HONORARY LIFE MEMBERS

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

September 3, 1992

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

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

Dear Mr. Simonson,

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

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

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

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

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

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

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

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

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

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

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

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

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

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- C [where less favorable review or more controversial issues might be anticipated, even including changes of beneficial ownership of rights to the permitted activity (IPC to LADWP)?
- D [QUESTION 1C) Where is the limit between reasonable convenience to the petitioner versus the need for real power in oversight and management of the permitting process by those potentially adversely affected? Why is it not reasonable to expect LADWP to deal with the ELY BLM District directly with regard to the Cross-tie? Why are mitigation measures of import to the Ely BLM District being determined by two surrogates, Idaho BLM and Idaho Power rather than those directly affected, Ely BLM and LADWP?
- ISSUE 2) This DEIS/DPA is written in such a summary form that it is very difficult if not impossible to make any definitive decision or comment based on technical data. Such data are crucial to informed comment and are the heart of the requirements of NEPA, which mandates this DEIS/DPA. A very limited number of technical reports and data tables were printed and distributed to public agencies but not to individuals. NEPA also requires that all persons wishing to comment be heard. Those of us who have legitimate interests in the project, but who do not live conveniently close to a "file" copy are effectively excluded from informed comment. If expense is the issue, such expenses should be bourn by the petitioner and be a routine expense of the permit process. The respondent has no control over the magnitude of the project and hence the amount of technical data required to support the decision. NEPA requires that this data be available to all respondents.

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

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

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

RESPONSES

- D Please refer to Response B above. The IPCo is the project proponent for the Ely to Delta segment because of the original right-of-way application. The LADWP has been involved in all aspects of the SWIP EIS process because of the IPCo's intent to request the BLM to transfer the right-of-way grant for this segment, if granted, to the LADWP. Again, the BLM in Ely has also been involved in every step of the EIS process, and will be involved in the decision process with the rest of the potentially affected BLM districts. If a right-of-way for the Ely to Delta segment is granted, the BLM in Ely will be directly involved with in the development of the Construction, Operation, and Maintenance Plans, as well as the actual construction, operation, and maintenance of the project. Refer to page 1-34 of this document for more information regarding the Construction, Operation, and Maintenance Plan.
- E The technical reports and data tables were made available to all interested parties to review, as explained in Appendix H of the SWIP DEIS/DPA. Only a limited number of technical reports were printed because of the costs of printing and mailing the nine document sets. The alternative to making these limited number of documents available for public review would have been to restrict public review to the project files. The technical reports were produced to facilitate public review of all of the detailed studies without having to travel to Idaho. Additional sets of these documents were sent to the local libraries indicated on page 4-17 of this document.
- F Refer to Response E above.
- G Refer to Response E above.

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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AA

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

BB

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

CC

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

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

Advantages

- lower initial costs
- less visual impact

Disadvantages

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

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

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

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

BB

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

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

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

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

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

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

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

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

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

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

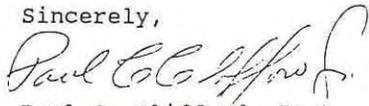
The preference of utilities not to stack multiple lines on a single set of towers is based on reliability (e.g., if a failure occurs all the multiple circuits would typically malfunction). However, typically if a single circuit line fails, only that line is affected.

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

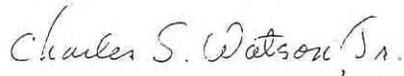
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COMMENTS

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

Sincerely,



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



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

cc: Mr. Billy Templeton
Nevada State BLM Director

Mr. Kenneth Walker
Ely District BLM Manager

RESPONSES

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

LETTER #B-11
COMMENTS

RESPONSES



OREGON - CALIFORNIA TRAILS ASSOCIATION

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

September 1, 1992

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

Dear Mr. Simonson:

RE: COMMENTS ON SOUTHWEST INTERTIE PROJECT DEIS/DPA

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

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

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

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

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

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

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

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

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

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

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

RESPONSES

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

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

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

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

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

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

Sincerely,



Thomas H. Hunt
National Trails Preservation
Officer

LETTER B-11

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COMMENTS



SIERRA CLUB

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

RESPONSES

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

September 12, 1992

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

Dear Mr. Simonson:

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

Purpose and Need

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The No Action Alternative

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

RESPONSES

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

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

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

A DC transmission alternative for transmitting 1200 MW of power between from Midpoint to the Dry Lake Area would cost about \$488 million (\$200 million for line and \$144 million for each line terminal) compared to \$356 million for the proposed AC project. As pointed out in the SWIP DEIS/DPA, additional load taps are not nearly as feasible with a DC alternative. The cost of each site is an order of magnitude greater (\$100+ million v. \$10 million) and are not included in the \$488 million estimate for the basic line.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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project because they recognize the benefits of the SWIP to their least-cost planning process. Transmission facilities will contribute in several important ways to the region's task of meeting future load growth in the most efficient manner possible and with the smallest amount of new generating capacity. First, it is important to recognize the seasonal load diversity within the region. Transmission will allow existing resources to be used to serve seasonal load requirements in one part of the region while also meeting new load growth requirements in another part of the region. Therefore, total regional resource requirements (i.e., generation) can be reduced by using transmission. Then, when new regional generating resources are needed, transmission, such as the SWIP, will make more resource options available, and should help minimize costs and environmental impacts.

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

H Refer to Response E above.

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

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

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

Compliance with NEPA

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

Relationship to other EISs

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

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

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

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

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

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

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

M

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

N

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

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

L

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

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

M

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

Qualification of Preparers

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

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

Circulation of Draft to Interested Parties

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

Corridor Siting Considerations - Great Basin National Park

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

1. BLM Must Remove Crosstie From DEIS/DAP

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mitigation Measures

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

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

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

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

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

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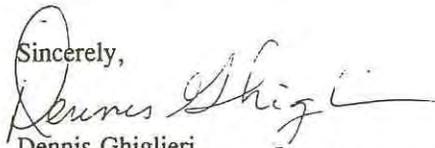
Visual Impairment Analysis

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

Conclusion

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

Sincerely,



Dennis Ghiglieri
Conservation Chairman, Toiyabe Chapter

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

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

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

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THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGIONAL OFFICE

September 18, 1992

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

re: Comments on DEIS for Southwest Intertie Project

Dear Mr. Simonson;

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

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

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

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- A Additional information on the purpose and need for the project is found in Chapter 3 of this document.
- B The BLM agrees that there will be impacts from the construction, operation, and maintenance of the SWIP. The BLM acknowledges that much of the mileage of the proposed action is through relatively undisturbed landscape.
- C The BLM agrees that there would be impacts to desert tortoise, although mitigation measures taken during construction should be very effective in reducing or eliminating these adverse effects. The question of transmission line impacts on hatchling tortoises is a subject of ongoing study. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure, and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area.

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

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

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

Sincerely,

Norbert Riedy
Norbert Riedy
Senior Policy Analyst

RESPONSES

- D A specific raptor migration route has not been identified. It is well known that large numbers of migratory raptors are present in the Goshute Mountains during both spring and fall.
- Given the structural configuration of 500kV transmission lines, the potential electrocution hazard to birds of prey is relatively minor. The 500kV transmission systems proposed for the SWIP would use V-guyed steel lattice, self-supporting steel lattice tubular, and steel H-frame towers. The spacing between conductors and towers is sufficient to prevent phase-to-phase or phase-to-ground contact. Conductors are hung on the supporting structure in such a manner that they are 23 to 32 feet apart. Further, conductors are hung on insulating systems that will be 14 to 20 feet in length depending on tower design (refer to pages 2-12 through 2-14 of the DEIS/DPA). Because of the distance between conductors and towers, other conductor bundles, static lines, and the ground, it is virtually impossible for even the largest species of raptor to be electrocuted as a result of alighting on conductors or the supporting tower.
- Refer to the discussion of Avian Collision Hazards on page 3-89 of this document.
- E There would not be significant visual impacts to visitors at Great Basin National Park. The assumed centerline of the SWIP Ely to Delta segment (230kV Corridor Route) is approximately seven miles north of Wheeler Peak, the casual observer would likely not notice the SWIP or the existing 230kV lines from any of the viewpoints within the park. The BLM agrees that there will be significant visual effects to park visitors driving on the travel routes approaching the park (e.g., U.S. Highway 6/50) and that there will be visual impacts to some of the proposed interpretive facilities outside of the park boundaries. These impacts are all documented in the DEIS/DPA and in Volume III - Human Environment Technical Report (refer to Appendix H of the DEIS/DPA for the locations where the technical reports can be reviewed).
- It is true that the existing 230kV lines were constructed prior to establishment of Great Basin National Park. The BLM will consider your comments during its decision process.
- F The BLM agrees that routing of the transmission line near WSAs would cause some visual impacts. These impacts are further discussed on page 3-26 of this

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

The question of transmission line impacts on hatchling tortoises is evolving. Raven predation on hatchlings in some portions of the Mojave Desert may be having a deleterious effect on tortoise population structure, and the presence of transmission lines (providing nesting sites and hunting perches for ravens) may be contributory. The phenomenon appears to be localized, however, and generalizations cannot be made at this time. Further, given the presence of an existing transmission line, it is not obvious that increased perch sites will result in increased raven numbers, or raven predation. The BLM believes it is unlikely that perch site availability is currently limiting the potential for raven predation in the project area. Also, the impact of predatory ravens on hatchling desert tortoises appears to be a local problem; it has not been documented as occurring region wide.