Stateline Solar Farm
Environmental Impact Statement
Draft Scoping Report

Prepared for the Bureau of Land Management
and San Bernardino County

Environment

Submitted to:
Bureau of Land Management
California Desert District Office
Moreno Valley, CA

Submitted by:
AECOM
Fort Collins, Colorado
Nov. 17, 2011

Stateline Solar Energy Project Scoping Report

Draft

Prepared By

Reviewed By

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1.0 Introduction

Two primary principles of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) are full disclosure of potential environmental effects and open public participation throughout the decision-making process. The Bureau of Land Management (BLM) and San Bernardino County (County) are preparing a joint Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the proposed Stateline Solar Energy Project (Project). This Scoping Report provides an overview of the public scoping process and a summary of the scoping comments, issues, and concerns identified during the public scoping period.

1.1 Project Description

First Solar Development, Inc. (First Solar) proposes to construct, operate, maintain a 300-megawatt, photovoltaic solar energy project. The Stateline Solar Energy Project would be located on approximately 2,000 acres of BLM-administered in Ivanpah Valley, California. Project components include access roads, photovoltaic arrays, an electric substation, meteorological station, monitoring and maintenance facility, and an approximately 2-mile generation tie-in.

1.2 Joint Lead Agencies' Purpose and Need

1.2.1 Bureau of Land Management

The BLM Needles Field Office is responding to a request from First Solar to obtain a right-of-way (ROW) for the use of public lands to construct, operate, and maintain a 300-megawatt, photovoltaic solar energy project. The BLM will prepare an EIS in conformance with NEPA. The purpose of the EIS is for the BLM to evaluate and disclose potential impacts of the proposed Project and alternatives, to determine whether to issue a ROW Grant, and to determine whether to amend the California Desert Conservation Area Plan, as amended and the Las Vegas Resource Management Plan.

The BLM is required to evaluate and make decisions regarding the granting of ROWs in response to proponent applications. Under the Federal Land Policy and Management Act of 1976, Title V is authorized to issue ROW grants. It is the policy of the BLM to authorize all ROW applications that are in conformance with approved land use plans at the discretion of the authorizing officer.

1.2.2 San Bernardino County

The County of San Bernardino has received an application for a Well Permit associated with the proposed Project. The applicant proposes to extract approximately 1,900 acre feet of groundwater per year to be used during construction and operation of the proposed Project. The drilling of one or more groundwater wells is subject to a discretionary permit from the County under the County's Desert Groundwater Management Ordinance, County Code § 33.06551 ("Groundwater Ordinance"): thus, subjecting the proposed Project to CEQA review. Pursuant to an agreement between the County and the BLM, approved by the County Board of Supervisors on December 2, 2003 (Item 8), all groundwater wells proposed to be drilled on BLM lands within the County are required to comply with the Groundwater Ordinance. Accordingly, the County will act as the Lead Agency under CEQA (14 California Code of Regulations ("CEQA Guidelines") §§ 15051, 15367, and 16021).

1.3 Purpose of Scoping

Scoping is the process of actively soliciting input from the public and other interested federal, state, tribal, and local agencies. The scoping process is required by the Council on Environmental Quality 1979 regulations (40 Code of Federal Regulations [CFR] 1501.7) and under CEQA for projects of "statewide, regional or area-wide significance" per §21083. Information from scoping assists the BLM and San Bernardino County in identifying potential environmental issues, alternatives, and potential mitigation

measures associated with developing the proposed Stateline Solar Energy Project. The process provides a mechanism for determining the scope and the significant issues associated with developing the proposed Project (40 CFR 1507.7 and 40 CFR 1508.25) so that the EIS/EIR can focus the analysis on areas of interest and concern. Therefore, public participation during the scoping period is a vital component to preparing a comprehensive and sound EIS/EIR. Scoping provides the public, tribes, and agencies opportunities for meaningful public involvement in the decision-making process.

BLM and San Bernardino County's overall scoping goal for the Stateline Solar Energy Project is to engage a diverse group of public and agency participants in the NEPA process, solicit relevant input, and provide timely information through the duration of the project. Strategies for achieving this overall goal include:

- Provide accurate and timely information to the public;
- Provide ample opportunities for the public be involved in order to achieve supportable decisions;
- Promote multi-jurisdictional participation; and
- Integrate technical information and science into the public participation program to produce supportable management decisions that protect resource values.

2.0 Summary of Scoping Process

2.1 Notification

The initial step in the NEPA/CEQA process is to notify the public, other government agencies, and tribes of the lead agencies' intent to prepare an EIS/EIR by publishing the Notice of Intent (NOI) in the *Federal Register* and the Notice of Preparation (NOP) at the California State Clearing House. The NOI for the Stateline Solar Energy Project was published in the *Federal Register* on August 4, 2011, and the NOP was published with the California State Clearing House on August 20,2011 (see **Appendix A – Notification**).

2.1.1 Consultation and Coordination with Federal, State, and Local Governments

The BLM and San Bernardino County are engaged in coordination and consultation with federal, state, and local agencies about the potential for the proposed Stateline Solar Energy Project to affect sensitive resources (40 CFR, 1508.5; 1508.6; and Forty Questions No. 14[a], 14[b], 14[c]). The coordination and consultation must occur in a timely manner and are required before any final decisions are made. Issues related to agency consultation include biological resources, cultural resources, socioeconomics, and land and water management. For example, biological resource consultations would apply to the potential for activities to disturb sensitive species or habitats; cultural resource consultations would apply to the potential for impacts to important cultural archaeological and historic sites. To-date, no agencies have committed to participate as a cooperating agency for this project.

2.1.2 Tribal Government-to-Government Consultation

Federal agencies are responsible for compliance with a host of laws, Executive Orders (EOs) and Memoranda, treaties, departmental policies and other mandates regarding their legal relationships with and responsibilities to Native Americans. The government-to-government relationship that the United States (U.S.) has with federally recognized Indian Tribes started with the Commerce Clause of the U.S. Constitution where Tribes were recognized as sovereign nations, and has continued in federal laws and policies including but not limited to the National Historic Preservation Act, NEPA, Archaeological Resources Protect Act, American Indian Religious Freedom Act, Native American Grave Protection and Repatriation Act, and EOs 12875, 12898, 13077, and 13175. Compliance with this body of law requires consultation with Tribes on the effects of proposed actions.

An initial consultation effort with the Tribes was conducted by letter to six Tribes in November 2007 and included the Las Vegas Bank of Paiute Indians, Pahrump Paiute, Moapa Band of Paiute Indians, Fort Mojave Indian Tribe, Colorado Rivers Indian Tribe, and the Chemehuevi Tribe. On December 23, 2010, and again on August 22, 2011, the BLM contacted by letter the following Tribes about the Stateline Solar Energy Project:

- Fort Mojave Indian Tribe
- Colorado Rivers Indian Tribe
- Chemehuevi Indian Tribe
- Twenty-Nine Palms Band of Mission Indians
- San Manuel Bank of Mission Indians
- Ramona Band of Mission Indians
- Las Vegas Bank of Paiute Indians
- Moapa Band of Paiute Indians
- San Fernando Band of Mission Indians
- Pahrump Paiute
- Serrano Nation of Indians

To-date, the Pahrump Paiute is the only Tribe that has responded by requesting additional information about the project and the proposed location. This response was submitted after a change in tribal leadership.

Consultation with the Tribes will continue throughout the Stateline Solar Energy Project as stipulated under EO 13175, November 6, 2000.

2.2 Scoping Meetings

Public scoping meetings offer an opportunity for the public to participate in the Stateline Solar Energy Project during the scoping period. The meetings promote information exchange about the proposed Project and to gather public input. BLM and San Bernardino County hosted one public scoping on Wednesday, August 31, 2011, from 6:00 pm to 8:00 pm at the Primm Valley Golf Clubhouse with a total attendance of 44 individuals.

The public scoping meeting was conducted as an open house with an agency/applicant presentation. An open house format was held prior to and following the presentation to allow for an open exchange of information and provide an opportunity for attendees to ask agency personnel, the Stateline Solar Energy Project applicant, and EIS contractor questions about the proposed Project. Attendees were greeted at the Welcome Desk and asked to sign and record their attendance. Display boards showing project information and the NEPA process were available to assist in the informal discussions during the open house**. Appendix B – Scoping materials** includes materials that were available at the public scoping meetings.

3.0 Summary of Scoping Comments

The BLM and San Bernardino County received a total of 26 comment submittals (e.g., letter, comment form, email) containing 360 individual comments during the public scoping period. Most comments came from federal agencies and other organizations with interest in the proposed project. Following the close of the public scoping period, comments were compiled and analyzed to identify issues and concerns.

Within each comment submittal, individual comments were identified, reviewed, and entered into an electronic database.

Once the individual comments were compiled in the database, reports were generated categorizing issues first by the commenter type (e.g. agency, individual, etc.) and then by resource (e.g., biology, geology, etc.) or topic (e.g., alternatives, purpose and need, etc.). The summary reports were reviewed to identify data enter errors. A comprehensive list of scoping comments is provided in **Appendix C – Scoping Comments** and sorted by commenter type and then by topic.

4.0 Identification of Issues

Information acquired during the scoping period assists the BLM and San Bernardino County in identifying the potential environmental issues, alternatives, and mitigation measures associated with developing the proposed Stateline Solar Energy Project. After evaluating the comments received during the scoping period, several key issues emerged. The following issues represent the most public concern about the proposed Project.

- Impacts to air quality from dust and particular matter during project construction.
- Recommendations for the alternatives analysis including:
  - Reduced acreage, reduced megawatts, and/or modified footprint;
  - Evaluation of different types of solar technologies;
  - Alternative sites on private lands and previously disturbed lands;
  - Conservation Alternative to preserve desert tortoise populations in Ivanpah Valley; and
  - Distributed Generation in the built environment.
- Cumulative effects from other proposed projects including additional solar projects to all resources in Ivanpah Valley.
- Impacts to Desert Tortoise populations including connectivity, habitat fragmentation, and effectiveness of relocation/translocation.
- Impacts to migratory birds including the Golden Eagle and desert bighorn sheep migration.
- Potential impacts to rare plant species and loss of habitat.
- Alteration of hydrologic functions, drainage patterns, and natural channels of ephemeral washes.
- Traffic impacts during project construction compounded by other proposed projects in the Ivanpah Valley.
- Visual impacts to drivers along Interstate-15 and visitors to the Mojave National Preserve.
- Inconsistencies with land use plans including the California Conservation Plan and the Northern and Eastern Mojave Plan.
- Impacts to BLM grazing permittees, their ability to manage range conditions, and grazing pressure on permitted lands in the Mojave National Preserve.

5.0 Activities Following Scoping

The NEPA/CEQA process provides additional opportunities for public input. Following the scoping period, the Draft EIS/EIR will be prepared, incorporating information received from the public during the

scoping period. Once the Draft EIS/EIR is complete, BLM and San Bernardino County will publish the Notice of Availability in the *Federal Register/*Notice of Completion and distribute the Draft EIS/EIR for public review. During the Draft EIS/EIR review, the public can comment on key issues and the adequacy of the purpose and need, alternatives analysis, impacts analysis, and proposed mitigation presented in the draft document. Public hearings will take place to allow the public to formally present their comments. Public comments will be recorded by a court reporter. **Figure 1** identifies additional opportunities and the anticipated schedule for the public to comment and participate in the EIS/EIR process. Comments received on the Draft EIS/EIR will be addressed in the Final EIS/EIR.

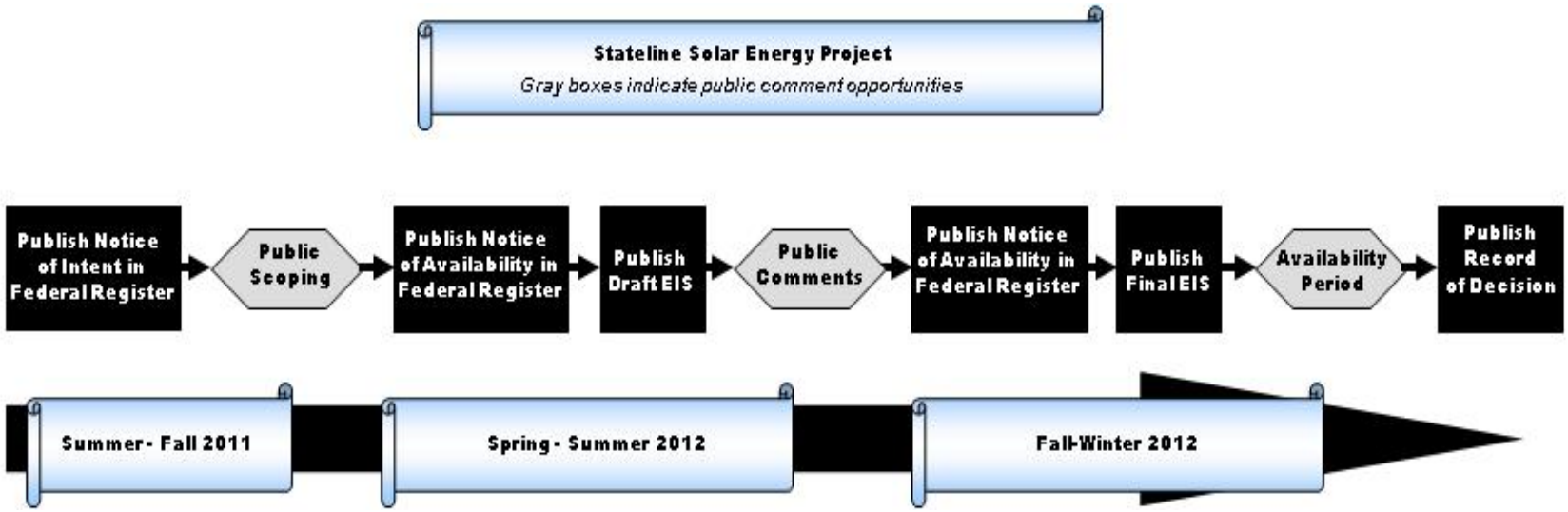

Figure 1 Stateline Solar Energy Project EIS Timeline

Appendix A

Notification

through the Bureau of Land Management (BLM) during the development of a resource management plan (RMP) for the D–E NCA. Since this council was formed, one council member representing Delta County and one council member representing natural values have expressed interest in resigning from the council due to time conflicts. As a result, the Secretary is soliciting applications to replace the current occupants of these two seats.

DATES: Submit nomination packages on or before September 6, 2011.

ADDRESSES: Send completed Council nominations to D–E NCA Interim Manager, Grand Junction Field Office, 2815 H Road, Grand Junction, Colorado 81506. Nomination forms may be obtained at the Grand Junction Field Office at the above address or at the BLM Uncompahgre Field Office, 2465 S. Townsend Ave., Montrose, Colorado 81401.

FOR FURTHER INFORMATION CONTACT: Katie A. Stevens, D–E NCA Interim Manager, 970–244–3049, *kasteven@blm.gov.* Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The D–E NCA and Dominguez Canyon Wilderness Area, located within the D–E NCA, were established by the Omnibus Public Land Management Act of 2009, Public Law 111–11 (Act). The D–E NCA is comprised of approximately 209,610 acres of public land, including approximately 66,280 acres designated as Dominguez Canyon Wilderness Area located in Delta, Montrose, and Mesa counties, Colorado. The purpose of the D–E NCA is to conserve and protect the unique and important resources and values of the land for the benefit and enjoyment of present and future generations. These resources and values include the geological, cultural, archaeological, paleontological, natural, scientific, recreational, wilderness, wildlife, riparian, historical, educational, and scenic resources of the public lands, and the water resources of area streams based on seasonally available flows that are necessary to support aquatic, riparian, and terrestrial species and communities. According to the Act, the 10-member council is to include, to the extent practicable:

1. One member appointed after considering the recommendations of the Mesa County Commission;

2. One member appointed after considering the recommendations of the Montrose County Commission;

3. One member appointed after considering the recommendations of the Delta County Commission;

4. One member appointed after considering the recommendations of the permittees holding grazing allotments within the D–E NCA or the wilderness; and

5. Five members who reside in, or within reasonable proximity to Mesa, Delta, or Montrose counties, Colorado, with backgrounds that reflect:

a. The purposes for which the D–E NCA or wilderness was established; and

b. The interests of the stakeholders that are affected by the planning and management of the D–E NCA and wilderness.

Any individual or organization may nominate one or more persons to serve on the Council. Individuals may nominate themselves for Council membership. The Obama Administration prohibits individuals who are currently federally registered lobbyists to serve on all Federal Advisory Committee Act (FACA) and non-FACA boards, committees, or councils. Nomination forms may be obtained from the BLM Grand Junction or Uncompahgre Field Offices, or may be downloaded from the following Web site: *http://www.blm.gov/co/st/en/nca/denca/denca_rmp/DENCA_Resource_Advisory_Council.html.*

Nomination packages must include a completed nomination form, letters of reference from the represented interests or organizations, as well as any other information relevant to the nominee's qualifications.

The Grand Junction and Uncompahgre Field Offices will review the nomination packages in coordination with the affected counties and the Governor of Colorado before forwarding recommendations to the Secretary, who will make the appointments. The Council shall be subject to the FACA, 5 U.S.C. App. 2; and the Federal Land Management Policy Act of 1976, 43 U.S.C. 1701 *et seq.*

Helen M. Hankins,

State Director.

[FR Doc. 2011–19778 Filed 8–3–11; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCAD0900, L51010000.LVRWB09B2380.FX0000]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Stateline Solar Farm, San Bernardino County, CA and Possible Land Use Plan Amendments and Notice of Segregation of Public Lands

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the Bureau of Land Management (BLM) Needles Field Office, Needles, California, intends to prepare an Environmental Impact Statement (EIS), which may include potential land use plan amendments to the California Desert Conservation Area (CDCA) Plan, as amended, and the Las Vegas Resource Management Plan (RMP), related to First Solar Development, Inc.'s (First Solar) right-of-way (ROW) application for the Stateline Solar Farm (Stateline), a 300–Megawatt (MW) photovoltaic (PV) Solar electricity generation project.

By this notice, the BLM is: (1) Announcing the beginning of the scoping process to solicit public comments and identify issues related to the EIS; and (2) Segregating the public lands located within the Stateline ROW application area from operation of the public land laws including the Mining Law, but not the Mineral Leasing or Material Sales Acts, for a period of 2 years from the date of publication of this notice.

DATES: This notice initiates: (1) The public scoping process for the EIS; and (2) The 2-year segregation period for the public lands within the Stateline ROW application area, effective as of August 4, 2011. The segregation will terminate as described below (see **SUPPLEMENTARY INFORMATION** section).

Comments on issues related to the EIS may be submitted in writing until September 6, 2011. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local news media, newspapers, and the BLM Web site at: *http://www.blm.gov/ca/st/en/fo/cdd.html.* In order for comments to be fully considered in the Draft EIS, all comments must be received prior to the close of the scoping period or 15 days

after the last public meeting, whichever is later. We will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments on issues and planning criteria related to the Stateline project by any of the following methods:

- *Web site: http://www.blm.gov/ca/st/en/fo/cdd.html.*
- *E-mail: statelinesolar@blm.gov.*
- *Fax:* (951) 697–5299.
- *Mail:* ATTN: Jeffery Childers, Project Manager, BLM California Desert District Office, 22835 Calle San Juan de Los Lagos, Moreno Valley, California 92553–9046.

Documents pertinent to this proposal may be examined at the California Desert District office (see address above).

FOR FURTHER INFORMATION CONTACT: And/or to have your name added to our mailing list, contact Jeffery Childers; telephone 951–697–5308; address BLM California Desert District Office, 22835 Calle San Juan de Los Lagos, Moreno Valley, California 92553–9046; e-mail at *jchilders@blm.gov.* Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: First Solar has requested a ROW authorization to construct, operate, maintain, and decommission the 300–MW PV Stateline solar energy project. The BLM is responding to First Solar's ROW application as required by FLPMA. The Stateline project would be located on BLM-administered lands and would include access roads, PV arrays, an electrical substation, meteorological station, monitoring and maintenance facility, and a 2.3 mile generation tie-line on approximately 2,000 acres. Potential alternatives to the proposed action may include reduced acreage, reduced MW, and/or modified footprint alternatives. The project location is in San Bernardino County approximately 2 miles south of the Nevada-California border and 0.5 miles west of Interstate 15. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the process for developing the EIS. At present, the BLM has identified the following preliminary issues: special status species, cultural resources, route designation, social and economic impacts, traffic, water, and visual resource resources.

Pursuant to the BLM's CDCA Plan, sites associated with power generation or transmission not identified in the CDCA Plan will be considered through the plan amendment process to determine the suitability of the site for solar development. The BLM may also consider additional potential plan amendments to the CDCA Plan and the Las Vegas RMP that might arise based on its assessment of the potential cumulative effects of other projects in the larger Ivanpah Valley watershed in California and Nevada to a range of resources, including, without limitation, biological, physical, and cultural resources. By this notice, the BLM is complying with requirements in 43 CFR 1610.2(c) to notify the public of potential amendments to the CDCA Plan and Las Vegas RMP, predicated on the findings of the EIS. If land use plan amendments are necessary, the BLM will integrate the land use planning process with the NEPA process for the Stateline project.

The plan amendments will be completed in compliance with FLPMA, NEPA, and all other relevant Federal law, executive orders, and BLM policies. Any new plan decisions will complement existing plan decisions and recognize valid existing rights.

The BLM will use and coordinate the NEPA commenting process to satisfy the public involvement process pursuant to Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f) as provided for in 36 CFR 800.2(d)(3). Native American tribal consultations will be conducted in accordance with policy, and tribal concerns will be given due consideration, including impacts on Indian trust assets. Federal, State, and local agencies, along with other stakeholders that may be interested or affected by the BLM's decision on this project, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate as a cooperating agency. In connection with its processing of First Solar's ROW application, the BLM is also segregating, under the authority contained in 43 CFR 2091.3–1(e) and 43 CFR 2804.25(e), subject to valid existing rights, the public lands within the Stateline application area from the operation of the public land laws including the Mining Law, but not the Mineral Leasing or the Material Sales Acts, for a period of 2 years from the date of publication of this notice. The public lands contained within this segregation total approximately 2,000 acres and are described as follows:

San Bernardino Meridian,

Township 16 North, Range 14 East,
Sec. 1, lots 1 and 2, W½ SW¼;
Sec. 2, lots 1 and 2, SE¼;
Sec. 3, lot 1;
Sec. 11, NE¼ NE¼ , NW¼ NE¼;
Sec. 12, NW¼ NW¼.
Township 17 North, Range 14 East,
Sec. 13, W½ , SE¼;
Sec. 14, All;
Sec. 15, All;
Sec. 22, All excluding the solar ROW CACA 48668;
Sec. 23, All;
Sec. 24, N½, SW¼, NW¼ NE¼ SE¼, W½ SE¼;
Sec. 25, All;
Sec. 26, All;
Sec. 34, SE¼ SE¼;
Sec. 35, All.

The BLM has determined that this segregation is necessary to ensure the orderly administration of the public lands by maintaining the status quo while it processes the First Solar's ROW authorization request for the above described lands.

The segregation period will terminate and the lands will automatically reopen to appropriation under the public land laws, including the Mining Law, if one of the following events occurs: (1) The BLM issues a decision granting, granting with modifications, or denying First Solar's ROW authorization request; (2) Publication of a **Federal Register** notice of termination of this segregation; or (3) No further administrative action occurs at the end of this segregation. Any segregation made under this authority is effective only for a period of up to 2 years.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 40 CFR 1501.7, 43 CFR 1610.2, 2091.3–1(e), and 2804.25(e)

Thomas Pogacnik,

Deputy State Director, Natural Resources.

[FR Doc. 2011–19781 Filed 8–3–11; 8:45 am]

BILLING CODE 4310–40–P

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT NEWS RELEASE
California Desert District

Release Date: 08/04/11
Contacts: David Briery , (951) 697-5220 or
Stephen Razo, (951) 697-5217

News Release No. CDD-11-64

BLM Initiates Environmental Review for Proposed Stateline Solar Farm in San Bernardino County

The Bureau of Land Management is seeking public comment on a proposed 300-megawatt solar energy project near the California-Nevada border in San Bernardino County.

The BLM today published a notice of intent (NOI) to review the environmental impacts of the proposed Stateline Solar Farm in San Bernardino County. The NOI also includes the possibility of amending the California Desert Conservation Area (CDCA) Plan based on the suitability of the site for solar development, as well as possibly amending both the CDCA Plan and the Las Vegas Resource Management Plan for potential cumulative effects from this project and other projects in the larger Ivanpah Valley watershed in California and Nevada.

First Solar Development, Inc. applied to the BLM for a right-of-way on public lands to construct the photovoltaic solar energy generation power plant facility about two miles south of the Nevada-California border on approximately 2,000 acres of public lands.

The BLM Environmental Impact Statement and possible Draft Plan Amendments will analyze the site-specific impacts of the proposed project. The analysis will include impacts on special-status species, cultural resources, route designation, social and economic impacts, traffic, water, and visual resources.

Publication of the NOI initiates a public scoping period of 30 days, ending Sept. 6, 2011. During the scoping period, the BLM will solicit public comment on planning issues, concerns, potential impacts, alternatives, and mitigation measures that should be considered in the analysis of the proposed action.

A public scoping meeting will be announced at least 15 days prior to its occurrence. In order for comments to be fully considered in the Draft EIS, all comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later. The BLM will use the public scoping comments to prepare the draft environmental documents and plan amendment. There will be additional opportunities for public participation upon publication of the Draft EIS.

Further details on the proposed solar energy project can be found at the following website: http://blm.gov/lsjd. For information, contact Jeff Childers at (951) 697-5308, or e-mail: jchilders@blm.gov.

--BLM--

California Desert District 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553

Last updated: 08-04-2011

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U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT NEWS RELEASE
California Desert District

Release Date: 08/12/11
Contacts: Contact: David Briery, 951-697-5220
Stephen Razo , 951-697-5217

News Release No. CA-CDD-11-68

Public Meeting Announced for Proposed Stateline Solar Farm in San Bernardino County

The Bureau of Land Management (BLM) announced today a public scoping meeting as part of the environmental review process for the Stateline Solar Farm energy project near the California-Nevada border in San Bernardino County, Calif. The meeting will be held from 6 - 9 p.m., Wednesday, Aug. 31, 2011, at the Primm Valley Golf Club, 1 Yates Well Road, Nipton, CA 92364.

Last week, the BLM published a notice of intent (NOI) to review the environmental impacts of the proposed 300-megawatt project. The NOI also includes the possibility of amending the California Desert Conservation Area (CDCA) Plan based on the suitability of the site for solar development, as well as possibly amending both the CDCA Plan and the Las Vegas Resource Management Plan for potential cumulative effects from this project and other projects in the larger Ivanpah Valley watershed in California and Nevada.

First Solar Development, Inc. applied to the BLM for a right-of-way on public lands to construct the photovoltaic solar power plant facility about two miles south of the Nevada-California border on approximately 2,000 acres of public lands.

The BLM Environmental Impact Statement and possible Draft Plan Amendments will analyze the site-specific impacts of the proposed project. The analysis will include impacts on special-status species, cultural resources, route designation, social and economic impacts, traffic, water, and visual resources.

Publication of the NOI initiated a public scoping period of 30 days, ending Sept. 15, 2011. During the scoping period, the BLM is soliciting public comment on planning issues, concerns, potential impacts, alternatives, and mitigation measures that should be considered in the analysis of the proposed action.

In order for comments to be fully considered in the Draft EIS, all comments must be received prior to the close of the scoping period. The BLM will use the public scoping comments to prepare the draft environmental documents and plan amendment. There will be additional opportunities for public participation upon publication of the Draft EIS.

Further details on the proposed solar energy project can be found at the following website: http://blm.gov/lsjd. For information, contact Jeff Childers at (951) 697-5308, or e-mail: jchilders@blm.gov.

--BLM--

California Desert District 22835 Calle San Juan de Los Lagos Moreno Valley, CA 92553

Last updated: 08-12-2011

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County of San Bernardino

NOTICE OF PREPARATION

DATE: August 20, 2011

FROM: San Bernardino County Land Use Services Department, Planning Division, 385 N. Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0182

TO: Interested Agencies, Organizations and Individuals

SUBJECT: Notice of Preparation of a Draft Environmental Impact Statement and a Draft Environmental Impact Report

PROJECT TITLE: STATELINE SOLAR FARM PROJECT

An environmental review of the proposed project must be conducted under both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Implementation of the project will require discretionary approvals from federal, state, and local agencies, and therefore, this project is subject to the environmental review requirements of both NEPA and CEQA. As Lead Agency for CEQA, the County of San Bernardino (County) issues this Notice of Preparation for the proposed Stateline Solar Farm Project (Project).

To ensure coordination between the NEPA and CEQA processes, and to avoid duplication of effort, the lead agencies will prepare a joint EIR/EIS as recommended by 40 CFR 1506.2 and CEQA Guidelines 15222. The U.S. Department of the Interior, Bureau of Land Management (BLM) will be the NEPA Lead Agency and the County will be the CEQA Lead Agency, for preparation of the EIS/EIR. As the federal lead agency, the BLM issued a separate Notice of Intent (NOI) for the proposed Project. The BLM and the County will evaluate whether potentially significant environmental effects will result from the Project. The EIS/EIR will assess the effects of the proposed Project on the environment, identify potentially significant impacts, identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts, and discuss potentially feasible alternatives to the proposed Project that may accomplish basic project objectives, while reducing or eliminating any potential significant project impacts.

This Notice of Preparation provides a description of the proposed Project and solicits comments on the scope and content of the environmental document to be prepared to analyze the environmental impacts of the proposed Project. Comments are solicited from responsible agencies, trustee agencies, federal, state and local agencies and the general public. Comments received in response to this Notice of Preparation will be reviewed and considered by the lead agencies in determining the scope of the EIS/EIR. Due to time limits, as defined by CEQA, your response should be sent at the earliest possible date, but no later than thirty (30) days after publication of this Notice of Preparation. We need to know the views of your agency

as to the scope and content of the environmental information that is pertinent to your agency's statutory responsibilities in connection with the proposed Project.

Please include the name, phone number, and address of the contact person in your comment letter. Comments and questions may be directed to:

Doug Feremenga, Planner
County of San Bernardino Land Use Services Department
Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0182.
Telephone (909) 387-0240
E-mail: dferemenga@lusd.sbcounty.gov

Project description

Desert Stateline, LLC, (Applicant) a wholly owned subsidiary of First Solar Development, Inc. (First Solar) proposes to construct and operate a 300-megawatt alternating current (MWac) solar photovoltaic (PV) energy generating project known as the Stateline Solar Farm (Project). The Project will include PV modules, an on-site substation, a 2.3-mile 220 kV gen-tie line, fencing, lighting, a maintenance facility, guard shack, and access roads. The PV modules will be thin film CdTe arranged in rectangular arrays and will be in a fixed position with a maximum height of approximately 6-feet. The Project will ultimately connect to the Southern California Edison regional transmission grid. In addition, the Project will require approximately 1,900 acre-feet of water for construction over a 2-to-4 year construction period. During operation of the proposed Project minimal water will be required to wash the PV modules.

Environmental Setting

The PV generating facility (Solar Farm), the corridor for the Project's 220-kilovolt (kV) generation interconnection (gen-tie) transmission line, and the access road will be located on Federal lands managed by the U.S. Department of Interior, Bureau of Land Management (BLM), Needles Field Office. The Solar Farm site is approximately 2 miles south of the California-Nevada border and 0.5 mile west of Interstate 15 (I-15) in eastern San Bernardino County (Refer to Figure 1 *Regional Location Map*).

The Project study area is largely vacant, undeveloped, and relatively flat land in the Ivanpah Valley, along the western flank of the Ivanpah Dry Lake in the Mojave Desert in eastern San Bernardino County, California. The Primm Valley Golf Club is adjacent to the southeast corner of the Project study area. The Golf Club is accessed via the Yates Well Road exit from Interstate-15, which is also the southern access for the Project study area. There are no known residences within 0.5 mi of the boundary of the Project study area.

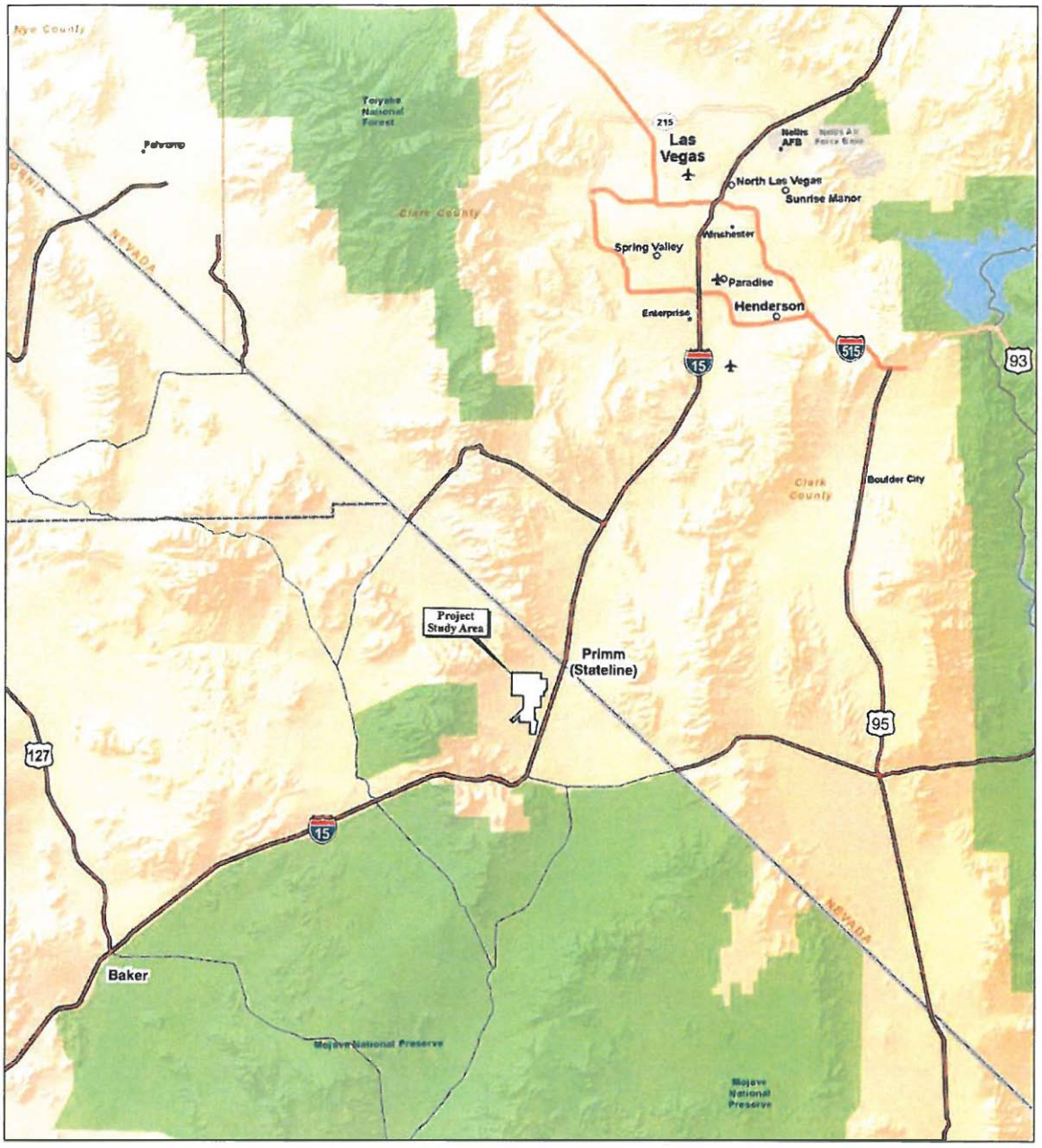


Figure 1: Regional Location Map

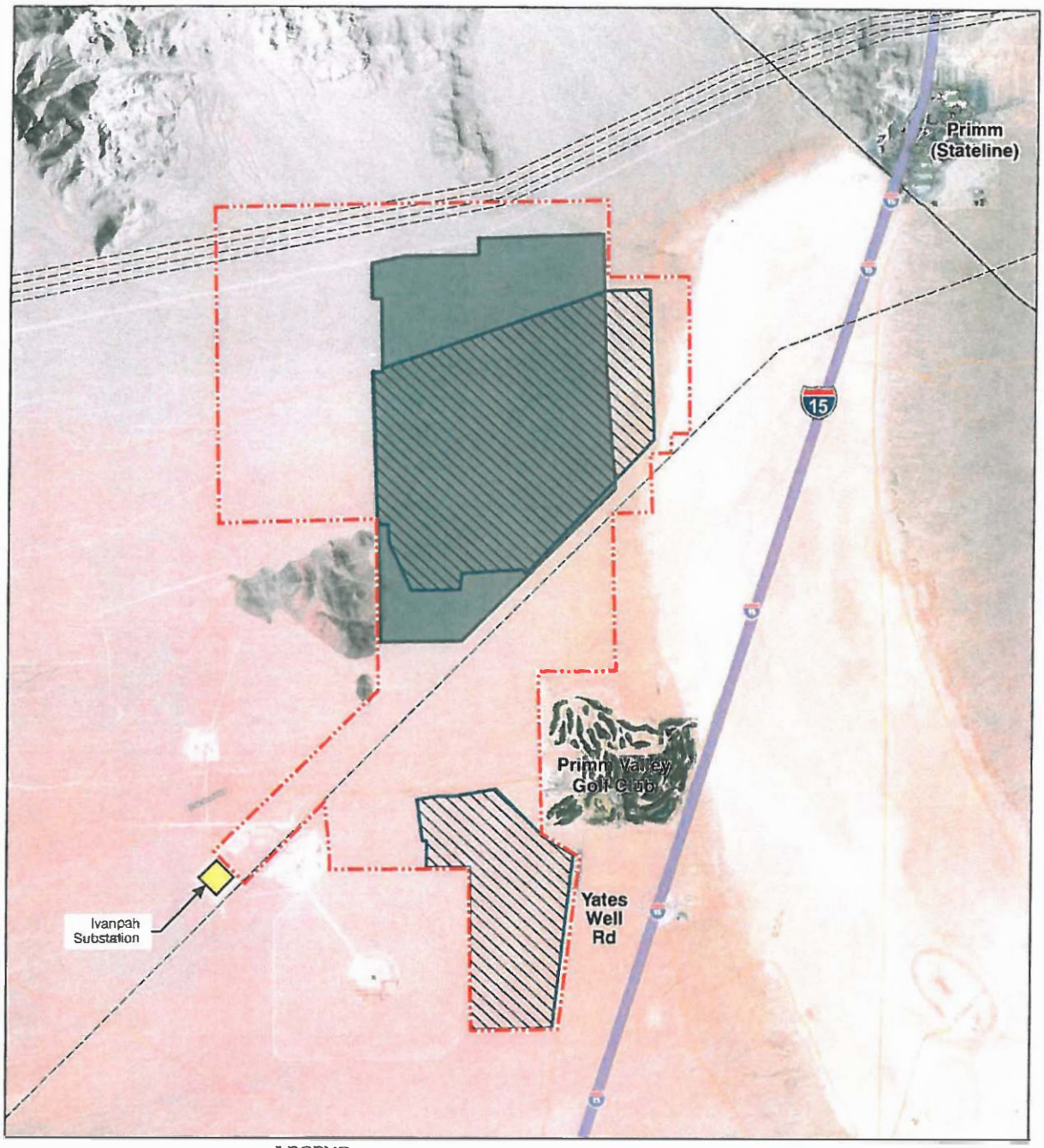
There is a major natural gas power plant approximately 1.5 mi east of Primm, NV. The Union Pacific railroad tracks are approximately 1.25 to 1.5 mi east of the Project site. The Project study area is crossed by two major power transmission corridors, one along the northern border, and the other crossing the southeast portion of the Project study area. The Project study area is also crossed by a major gas pipeline parallel to and just south of the northern power line corridor. Other existing uses crossing or within the Project study area and/or the Project site include transmission corridors, improved and unimproved roads, wells, and locatable mineral sites.

Project Activity

Two Project site plans – Proposed Project (Alternative B) and Alternative B1 are currently being considered (Refer to Figures 2, 2B and 2C). Both alternatives, where electricity will be generated, encompass between 1,900 (Alternative B1) and 2,150 ac (Alternative B) and will consist of the following components:

- Main generation area, which includes the PV arrays, combining switchgear, overhead lines, and access corridors;
- Monitoring and maintenance facility'
- On-site substation site security and fencing; and
- Access roads

The Project will use First Solar's thin film CdTe PV modules arranged in rectangular arrays and in a fixed position, with a maximum height of approximately 6-feet. The voltage of the electricity generated on site will be stepped up to 220 kilovolts (kV), the voltage of the gen-tie line, at the on-site substation. The 220 kV gen-tie line will transmit the electricity generated at the Project to the regional transmission system. The gen-tie line will exit the southwestern part of the Project site and follow a 150-foot wide transmission right-of-way to the Ivanpah Substation, approximately 2.3 miles south of the Project site. The gen-tie line will be mounted on either single or double circuit, galvanized or painted, lattice steel tower (LST) or tubular steel pole (TSP) structures. The transmission of the stepped-up 220 kV power produced by the Project will use overhead construction. Under this method of construction, the transmission conductor will be strung overhead on the supporting transmission structures. The heights of these structures will vary widely, depending on the electrical clearances required but will be less than 200 feet tall in all cases.



LEGEND

Project Study Area

Alternative B

Alternative B1

FIGURE 2

N

0 2250 4500

FEET

AERIAL SOURCE: Google Earth

Stateline Solar Farm Project

Project Study Area with Alternatives B and B1

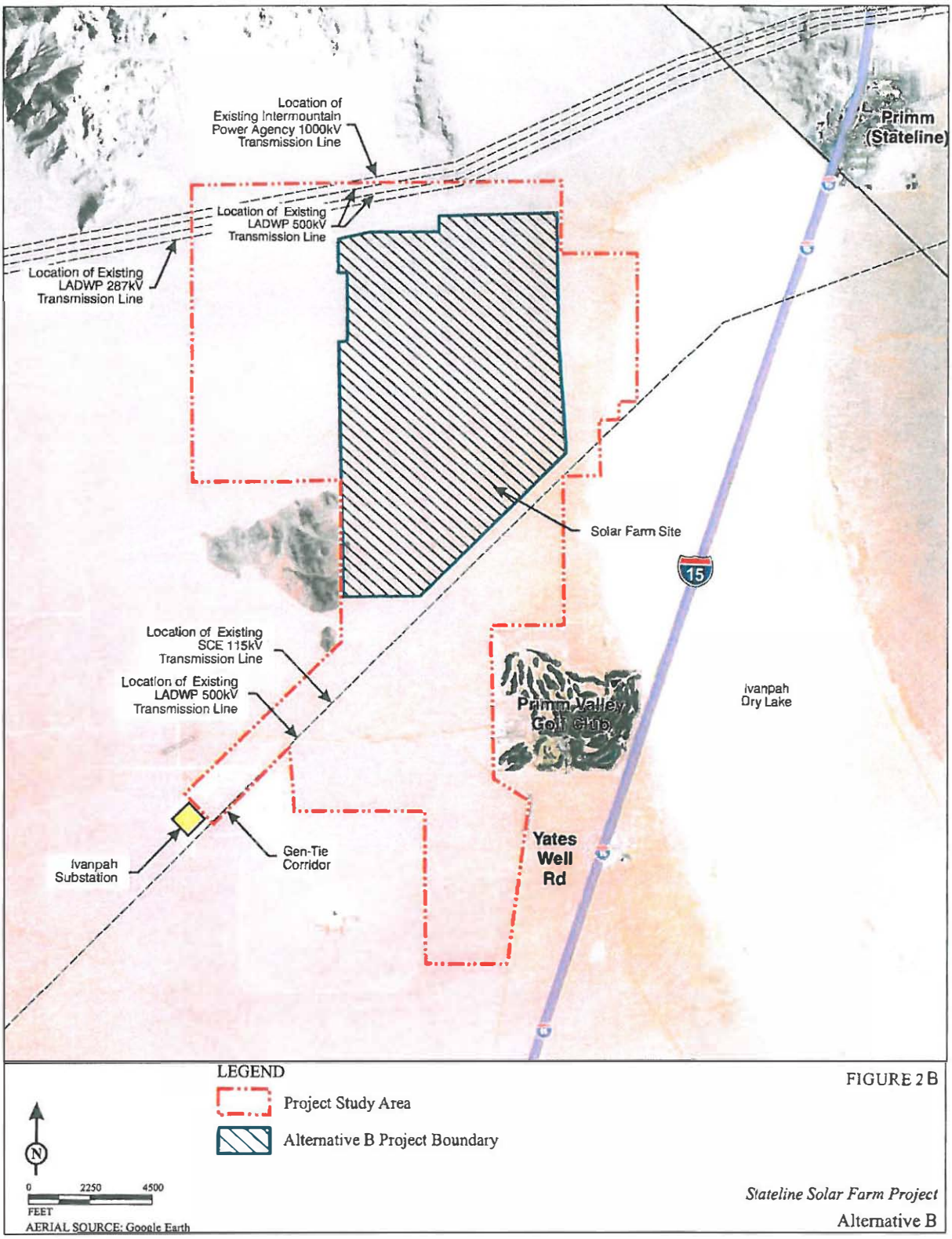
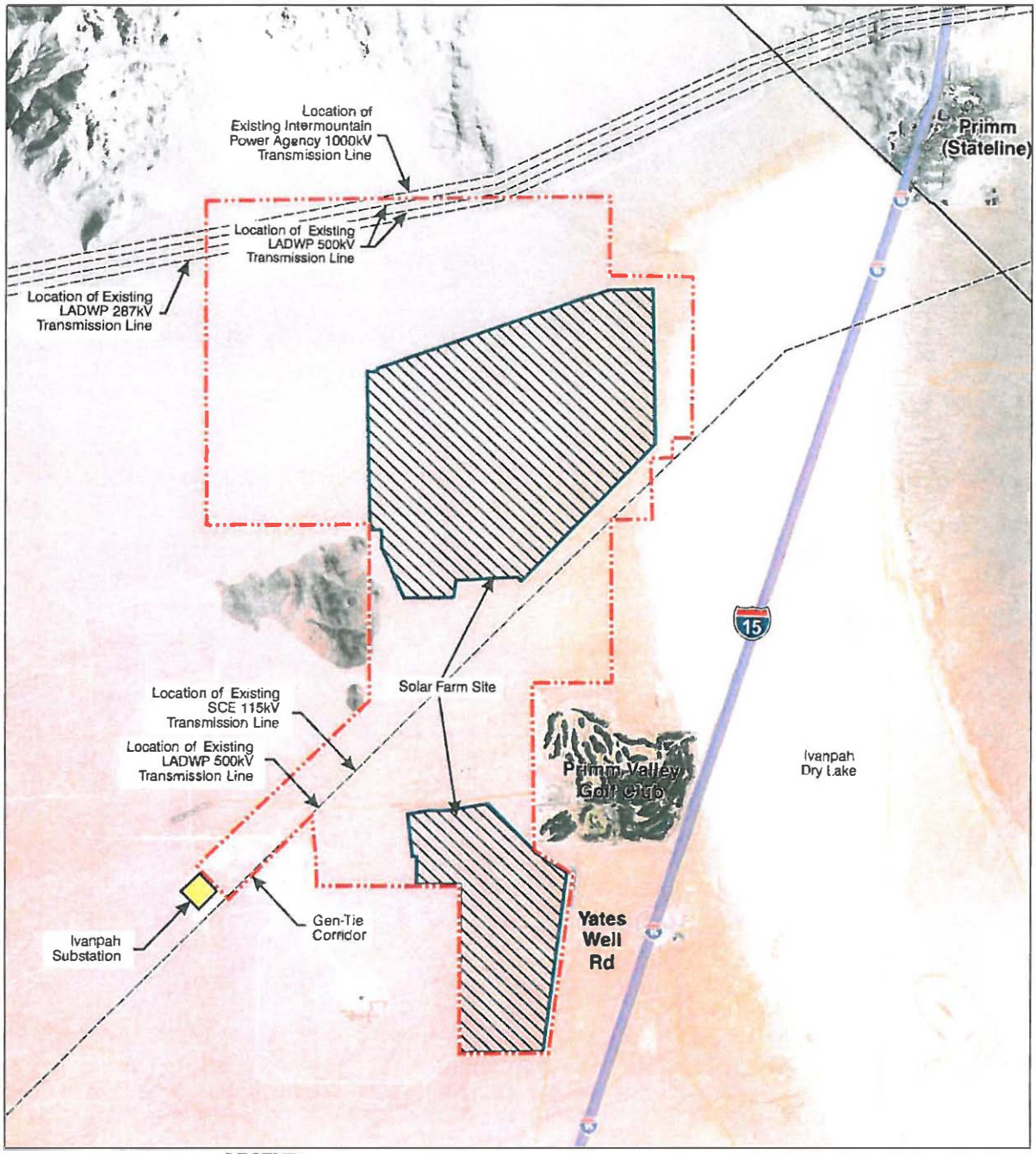


FIGURE 2 B

Stateline Solar Farm Project

Alternative B



LEGEND

Project Study Area

Alternative B1 Project Boundary

FIGURE 2C

N

0 2250 4500
FEET

AERIAL SOURCE: Google Earth

Stateline Solar Farm Project
Alternative B1

Project Construction

Construction of the Project will not begin until after all applicable approvals and permits have been obtained. The Applicant estimates that it will take approximately 2–4 years from initial construction mobilization to completion of construction. Construction of the Project will occur in two basic phases: (i) construction mobilization and (ii) construction and installation of the solar modules, electrical components, and gen-tie line. Construction mobilization includes preconstruction surveys; mobilization of personnel and equipment (including construction of access roads, and installation of trailers, laydown, and materials storage areas); and site preparation. After construction mobilization, construction of the PV arrays and gen-tie line will begin. Construction of the PV arrays is expected to take place at a pace of approximately one (1)-MW per day after an initial ramp up period.

Project Operation and Maintenance

The Project will be in operation for approximately 30 years. The Project is designed to have essentially no moving parts, no thermal cycle, and no water use for electricity generation. As a result, the Project will require only limited maintenance throughout its lifetime. Project maintenance activities will generally include all-weather road maintenance; vegetation restoration and management; scheduled maintenance of inverters, transformers, and other electrical equipment; and occasional replacement of faulty modules or other site electrical equipment. The all-weather access roads will be regularly inspected, and any degradation due to weather or wear and tear will be repaired. The Applicant will apply a dust palliative on dirt access roads, as needed, approximately once every 2–5 years.

The workforce for operations and maintenance and security purposes is estimated to be 7 to 10 full-time workers. Typical work schedules are expected to be during daylight hours only, with the exception of some limited maintenance work, required after dark when PV modules are not live, and 24-hour on-site security. Only limited deliveries will be necessary for replacement PV modules and equipment during Project operation. Daily traffic at the Project site during operations is expected to be approximately 20–30 daily round trips (total for employees and deliveries).

Government Agency Reviews and Permits

The BLM will be the lead Federal agency for approving the Project and will issue a Right of Way (ROW) grant authorizing the Project's construction, operation, and use of Federal lands. The decision regarding the issuance of the ROW grant will be based in part on an evaluation of the Project's potential environmental effects through the National Environmental Policy Act (NEPA) review process and the requirements of the Federal Land Policy and Management Act (FLPMA) and the California Desert Conservation Area (CDCA) Plan. This project will require an amendment to the CDCA Plan. As noted above, the NEPA process will involve the preparation of an Environmental Impact Statement (EIS) that will detail the Project's expected environmental impacts and mitigation measures to avoid or minimize identified impacts. BLM will prepare an EIS to comply with NEPA. BLM will issue the necessary ROW grant through its Record of Decision (ROD) following completion of

the Final EIS. The CDCA Plan Amendment required for the Project will also be addressed through the FLPMA and NEPA process.

The Applicant has submitted three well construction permits to the County. The well permit is a discretionary action, warranting CEQA review. As noted above, the CEQA process will involve the preparation of an Environmental Impact Report (EIR) that will detail the proposed Project's expected environmental impacts and mitigation measures to avoid or minimize identified impacts. The County will coordinate with the BLM in preparing a joint EIS/EIR, in order to comply with CEQA.

The Applicant is currently in the process of working with other applicable Federal, State, and local permitting agencies. These include the U.S. Fish and Wildlife Service (USFWS), the U.S. Army Corps of Engineers (USACE), the State Historic Preservation Officer (SHPO), California State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB), Mojave Desert Air Quality Management District, and the California Department of Fish and Game (CDFG), the County of San Bernardino and other agencies with jurisdiction over the Project in conjunction with the BLM's ROW grant approval process.

Potential Environmental Impacts

The lead agencies have determined that this project could result in significant environmental impacts and/or have a significant impact on the quality of the human environment. As such, preparation of a joint EIS/EIR is appropriate. Accordingly, the Lead Agencies did not prepare an Environmental Assessment or Initial Study for the project. However, the lead agencies have identified the following environmental considerations as potential significant effects of the project:

- Aesthetics/Visual
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Grazing/Wild Burros
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise/Vibration
- Population and Housing
- Public Health/Safety
- Public Services
- Recreation
- Social Economics/Environmental Justice
- Special Designations
- Transportation/Traffic
- Utilities and Service Systems
- Wilderness and Recreation
- Mandatory Findings of Significance

Scoping Meetings

The BLM and the County will host a scoping meeting to provide the opportunity for the public to learn about the project and to share any concerns or comments they may have about the project. Additionally, the public may submit information and identify issues to

be addressed during the EIS/EIR process. The scoping meeting is scheduled for Wednesday, August 31, 2011 from 6:00 p.m. to 9:00 p.m. at the following location:

Primm Valley Golf Club
1 Yates Well Road,
Nipton, California, 92364
(702) 679-5509

The meeting is an open house format to allow the public to visit with County and BLM representatives.

Comments Due Date

Due to the time limit of 30 days mandated by State law, your comments must be sent at the earliest possible date but not later than **September 23, 2011.**

Sincerely,

Doug Feremenga, Planner

COUNTY OF SAN BERNARDINO

LAND USE SERVICES DEPARTMENT

NOTICE OF PREPARATION

FROM: San Bernardino County/ Land Use Services Department/ Planning Division, 385 N. Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0182

TO: **Interested Agencies, Organizations and Individuals**

SUBJECT: Notice of Preparation of a Draft Environmental Impact Statement and a Draft Environmental Impact Report

The County of San Bernardino will act as the Lead Agency for compliance with the California Environmental Quality Act (CEQA), in cooperation with the federal Bureau of Land Management, will prepare a joint Draft Environmental Impact Statement and Environmental Impact Report (EIS/EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIS/EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the probable environmental effects are contained in the attached materials. An Initial Study has not been included as it is obvious that a project of this scope and magnitude would require an EIR. The attached analysis is based on the numerous preliminary studies that have been prepared for the project.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than **September 23, 2011.**

Please send your response to Mr. Doug Feremenga at the address shown above. We will need the name for a contact person in your agency.

Project Title: Stateline Solar Farm

Project Applicant: Desert Stateline, LLC

Project Description: The proposed Stateline Solar Farm (Project), located in the unincorporated Ivanpah Valley area of San Bernardino County, is a 300-megawatt alternating current (MWac) solar photovoltaic (PV) energy generating facility that includes an on-site substation, a 220 kV gen-tie line, and an access road, all entirely on approximately 2,200 acres of public lands managed by the Bureau of Land Management (BLM). The Project would connect to the Southern California Edison (SCE) regional transmission grid.

County Contact Person: Mr. Doug Feremenga, Planner, Planning Division
Telephone: (909) 387- 0240

Signature: D. Feremenga **Date:** August 20, 2011

Appendix B

Scoping Materials

Written Comment Sheet

First Solar Proposed Stateline Solar Farm

Joint EIS/EIR

We want your comments! If you have any issues, concerns, or questions that you would like addressed in the First Solar Stateline Proposed Stateline Solar Farm Joint Environmental Impact Statement (EIS)/Environmental Impact Report (EIR), please complete and submit this comment sheet at the scoping meeting to ensure your input is considered. You can also drop the comment sheet in the mail to the address on the reverse side of this sheet. Fold the comment sheet on the lines with the return address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Please submit your comments by ***September 23, 2011***. You may also submit comments by e-mail to statelinesolar@blm.gov.

For your comments to be the most effective, the BLM and San Bernardino County suggest the following guidelines:

- Keep your comments focused on the proposed project;
- Submit your comments on potential impacts and ideas for project alternatives; and
- Submit your comments within the timeframes announced. This helps the agencies include all concerns in the Draft EIS/EIR document.

If you have no comments or questions, but would like to be on our mailing list and receive a copy of the Draft EIS/EIR, please complete the contact information below.

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Please provide your contact information. If you would like to receive copies of the Draft EIS/EIR, please fill in the box on the reverse side and submit this form.

Before including your address, phone number, e-mail address or any other personally identifying information in your comment, you should be aware that your entire comment – including personal identifying information - may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name:_____ Title:_____

Organization: _____

Mailing address:_____

City, State, Zipcode:_____

E-mail:_____ Phone: _____

Thank you for your interest and participation!

Fold 2

_____
_____
_____

Affix Stamp

First Solar Proposed Stateline Solar Farm Project
Bureau of Land Management
California Desert District Office
22835 Calle San Juan de Los Lagos
Moreno Valley, CA 92553-9046

Fold 1

First Solar Proposed Stateline Solar Farm Project mailing list
To have your name added or removed from our mailing list for this project, please check the appropriate box. Be sure to fill out the contact information on the reverse side. If you do not ask us to remove your name from our mailing list, we will send you future EIS/EIR-related announcements.

☐ Yes, add my name to the mailing list to receive future information

☐ No, please remove my name from your mailing list

Sign up to receive the Draft EIS/EIR
To receive the Draft EIS/EIR check the appropriate box.

☐ Send me the Draft EIS/EIR in the following format:

☐ CD-rom ☐ Executive Summary only (about 50 pages)

Printed copies of the Draft EIS/EIR (about 500 pages) will be available at your local library or on BLM's Web site at http://www.blm.gov/ca/st/en/fo/cdd.html.

Existing Setting

The proposed project area includes the following features and resources.

(This list is not meant to be all-inclusive, but rather to serve as a starting point for public input.)

- Project site currently undeveloped, but in close proximity to:
  - Interstate 15
  - Development in Primm
  - Primm Golf Course
  - Other solar facilities
  - Ivanpah playa
  - Clark Mountain and Mojave National Preserve

- Project site includes wildlife (desert tortoise) and desert vegetation

- Project site sits on alluvial fan draining the Clark Mountain area from the west towards Ivanpah Playa to the east.

What are your concerns?

Preliminary Resource Management Issues and Concerns

The following potential issues and concerns have been identified to-date.

(This list is not meant to be all-inclusive, but rather to serve as a starting point for public input.)

- Impacts to desert tortoise and other wildlife, and their habitats
- Effects upon native vegetation
- Impacts to groundwater resources
- Visual impacts and conformance with existing Visual Resource Management classes
- Potential impacts from emissions and dust resulting from construction activities
- Potential conflicts between development activities and recreational activities
- Social and economic impacts to local communities
- Reclamation of disturbed land and control of non-native plants
- Impacts of increased traffic and associated effects upon county, state, and BLM roads and highways
- Cumulative effects of the solar development activities when combined with other ongoing and proposed developments on lands in Ivanpah Valley

What are your concerns?

Scoping Meeting Agenda

The scoping meeting will take the following format:

- 6:00 to 6:30 PM – Arrivals, Introductions, Refreshments

- 6:30 to 7:00 PM – Presentations

- BLM, County, and First Solar presentations describing the project, and the NEPA and CEQA processes

- 7:00 to 9:00 PM – Open House

Opportunity to:

- Meet BLM, County, and First Solar staff

- Ask general questions about the process and technical issues

- Submit written comments, and/or obtain information on additional ways you can participate in the process

Closing Date for Public Scoping Comments is September 23, 2011

Appendix C

Scoping Comments

FEDERAL AGENCIES	
Air Quality	Reference made to the CEQA significance thresholds can be found in the "MDAQMD CEQA and Federal Conformity Guidelines" at http://www.mdaqmd.ca.gov/Modules/showdocument.aspx?documentit=1456.
	The Mojave Desert Air Quality Management District recommends the County require that fugitive dust best management practices (including but not limited to applicable provisions of District Rule 403.2) be implemented in the grading and construction phases of the project.
	A Construction Emissions Mitigation Plan should be included in the DEIS.
	A description and estimate of project air emissions from construction and maintenance activities should be provided in the DEIS.
	A detailed discussion of ambient air conditions, National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed projects (cumulative and indirect areas) should be provided in the DEIS.
	The DEIS should consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the project impacts could be increased by climate change.
	The DEIS should identify the need for a Fugitive Dust Control Plan to reduce PM10 and PM2.5 emissions during construction (EPA recommendations included).
	The DEIS should quantify and disclose the anticipated climate change benefits from solar energy.
	The DEIS should specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance.
Alternatives	Alternatives should include reduced acreage, reduce MW and/or modified footprint alternatives should be included in the alternatives analysis.
	The alternatives analysis should describe the approach for identifying sensitive areas and how sensitivity was designated (low, medium, and high).
	The alternatives analysis should discuss different types of solar technologies and describe the benefits associated with the proposed technology.
	The alternatives analysis should include options for avoiding significant impacts.
	The DEIS should describe the reasons for eliminating alternatives not evaluated in detail.
	The US Fish and Wildlife Service recommends the County and the BLM fully analyze alternative sites to reduce impacts to desert tortoise connectivity, translocation efforts and to void "take" to nesting and foraging of golden eagles.
	The environmentally preferred alternative should be identified in the DEIS and should consider downsizing and/or relocation to other areas including private lands.
Aquatic	The DEIS should include an analysis of any adverse impacts to water quality and aquatic habitats.
Cumulative	The EIS/EIR should include a discussion of cumulative effects of the development of renewable energy resources on the desert tortoise, golden eagle, migratory birds in terms of both the Ivanpah Valley and the Mojave Desert.
	The Stateline Solar Farm could have a cumulative impact to desert tortoise connectivity, which could lead to population-level effects with the other proposed and approved developments
	All reasonably foreseeable direct, indirect , and cumulative impacts to water resources should be described in the EIS.
	A regional cumulative impacts analysis on avian and bat populations should be included in the DEIS.
	A thorough cumulative impact assessment to aquatic and biological resources, including the desert tortoise should be conducted in context of the energy developments occurring and proposed in the Ivanpah Valley.
	Cumulative impacts to desert washes and ecosystems should be addressed in the DEIS.
	EPA recommends preparing the cumulative impacts analysis using the principles and 8-step process in their guidance document.
	The cumulative effects analysis should be conducted on a regional basis in the larger Ivanpah Valley (California and Nevada).

FEDERAL AGENCIES	
Cumulative (Continued)	The cumulative impacts analysis should discuss the adequacy of the current and future transmission line capacity for all the regional energy projects and discuss whether the capacity can accommodate the proposed projects in the area.
	The DEIS should consider the cumulative impacts to water supply, endangered species, and habitat associated with multiple renewable energy and other development projects proposed in the Ivanpah Valley.
	The EIS/EIR should include a discussion of cumulative effects of the development of renewable energy resources on the desert tortoise, golden eagle, migratory birds in terms of both the Ivanpah Valley and the Mojave Desert.
	The DEIS should describe the reasonably foreseeable future land use and associated impacts that will result from the additional power supply.
	All reasonably foreseeable direct, indirect, and cumulative impacts to water resources should be described in the EIS.
Opinion	The Mojave Desert Air Quality Management District supports the development of renewable energy sources because this project is expected to produce cumulative and regional environmental benefits.
Cultural Resources	Coordination with Tribes and the SHPO/THPO, identification of NRHP eligible sites, and development of a Cultural Resource Management Plan should be included in the DEIS.
	The DEIS should address the existence of Indian sacred sites in the project area, address EO 13007, and discuss how the BLM will avoid affecting the physical integrity, accessibility, or use of sacred sites if they exist.
	The DEIS should describe the process and outcome of government-to-government consultation between the BLM and tribal governments, issued raised, and how issues were addressed.
Environmental Justice	If there are environmental justice populations, the DEIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations.
	The DEIS should include an evaluation of environmental justice populations within the geographic scope of the projects.
Wildlife	The EIS/EIR should discuss the potential impact of common ravens to the desert tortoise and describe measures to avoid, reduce, and mitigate those impacts.
	If project construction occurs during the breeding season, the EIS/EIR should describe how the take of migratory birds would be avoided.
	In addition to the USFWS' desert-wide plan to monitor and manage common raves, the USFWS recommends the adoption of site-specific measures and a monetary contribution to a fund for managing common ravens in the desert.
	Concern about impacts to common ravens use of solar panels for shade and other projects facilities for perching, roosting, or nesting and the effects of and increased number of ravens on young desert tortoises.
	Impacts associated with increase shade in the desert environment on vegetation and/or species should be addressed in the DEIS.
Hazardous Materials	Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste.
	Applicability of state and federal hazardous waste requirements should be addressed in the DEIS.
	EPA recommends that the proponent strive to address the full product life cycle by sourcing PV components from a company that 1) minimizes environmental impacts during raw material extraction; 2) manufactures PV panels in a zero waste facility; and 3) provides future PV disassembly for material recovery for reuse and recycling.
	The DEIS should address potential direct, indirect, and cumulative impacts of hazardous waste from construction and operation.
Mitigation	The EIS/EIR should discuss the potential impact of common ravens to the desert tortoise and describe measures to avoid, reduce, and mitigate those impacts.
	If project construction occurs during the breeding season, the EIS/EIR should describe how the take of migratory birds would be avoided.

FEDERAL AGENCIES	
Mitigation (Continued)	A comprehensive Eagle Conservation Plan should be prepared.
	Identify and quantify available compensatory lands in the DEIS.
	The DEIS should include mitigation, monitoring, and reporting measures resulting from consultation with the USFWS and California Department of Fish and Game.
	The DEIS should include an invasive plant management plan to monitor and control noxious weeds.
	Provisions to ensure habitat selected for compensatory mitigation will be protected in perpetuity should specified in the DEIS.
	The DEIS should describe measures to protect important wildlife habitat areas from potential adverse effects from shade resulting from construction of the PV panels.
	The DEIS should ensure that habitat selected for compensatory mitigation will be protected in perpetuity.
	The DEIS should include a requirement for decommissioning and site restoration plan that includes cost estimates, timeline, descriptions of structures to be removed, and a description of restoration measures.
	Incorporate information on the compensatory mitigation proposals for unavoidable impacts to waters of the State and biological resources such as the desert tortoise in the DEIS.
	The DEIS should discuss the availability of compensation land within the watershed to replace desert wash functions lost on the project site.
	Incorporate information on the compensatory mitigation proposals for unavoidable impacts to waters of the State and biological resources such as the desert tortoise in the DEIS.
NEPA Process	The environmental impacts of the proposed and alternatives should be presented in comparative form.
	The rationale to determine whether an impact is significant or not should be described.
Permitting	The DEIS alternatives should be consistent with the alternatives analysis required for a 404 permit, if a permit is required.
	The EPA recommends that the applicant determine the need for a California State Water Resources Control Board General Permit associated with construction activity Construction General Permit Order 2009-0009-DWQ and if needed, a description of the proposed stormwater pollution control and mitigation measures should be discussed in the DEIS.
	Recommends the BLM amend the California Desert Conservation Area Plan to prohibit large-scale development within the area bounded by I-15, the State line, and Clark Mountains to protect desert tortoise populations.
	The project applicant should consult with the US Army Corps of Engineers to determine if a Section 404 permit is required. The DEIS should describe all Waters of the US.
Project Description	The DEIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal, or local land use plans, policies, and controls in the project area.
	The EPA strongly encourages siting energy projects on disturbed, degraded, and contaminated sites before considered undisturbed lands.
Purpose and Need	The purpose and need should discuss the proposed project in the context of the larger energy market and how the project will assist the state (CA) in meeting its renewable energy portfolio standards and goals.
Special Status Species	The EIS/EIR should discuss the potential impact of common ravens to the desert tortoise and describe measures to avoid, reduce, and mitigate those impacts.
	Concern about impacts to common ravens use of solar panels for shade and other projects facilities for perching, roosting, or nesting and the effects of and increased number of ravens on young desert tortoises.
	The EIS/EIR should discuss the potential impact of common ravens to the desert tortoise and describe measures to avoid, reduce, and mitigate those impacts.
	Long-term monitoring should be conducted for important feeding, roosting, nesting, or wintering areas near the project site for golden eagles.
	Measures to avoid a "take" of golden eagles during construction and operation of the proposed project should be described in the EIS/EIR.

FEDERAL AGENCIES	
Special Status Species (Continued)	To fully assess potential impacts to the golden eagle, data collection on the project site location and movement patterns should be conducted.
	Identify and quantify available compensatory lands in the DEIS.
	Impacts to covered species from fence construction around the project site should be considered in the DEIS.
	The DEIS should include mitigation, monitoring, and reporting measures resulting from consultation with the USFWS and California Department of Fish and Game.
	The Stateline Solar Farm could have a cumulative impact to desert tortoise connectivity, which could lead to population-level effects with the other proposed and approved developments
	Concerns about the connectivity of desert tortoise habitat in the Ivanpah Valley and the potential for increased fragmentation of the population resulting from development of the Stateline Project.
	The desert tortoise population west of Interstate 15 in Ivanpah Valley is vulnerable to demographic and genetic effects associated with population size; additional mortality sources may reduce population recruitment or create demographic imbalances.
	The Project would likely involve desert tortoise translocation; the USFWS has concerns about increased mortality during translocation.
	The US Fish and Wildlife Service recommends that the applicant work closely with the USFWS and BLM to determine if an incidental take permit is need under the Bald and Golden Eagle Protection Act.
	The US Fish and Wildlife Service recommends that the EIS/EIR evaluate potential impacts to golden eagles documented near the proposed project area; concerns include species loss, degradation, and fragmentation of its habitat.
	With limited space in the Ivanpah Valley for desert tortoise translocation, there is concern that remaining portions of the valley during translocation would result in population densities that would increase the spread of upper respiratory tract disease, increase aggressive behavior, and increase predation.
	All petitioned and listed threatened and endangered species and critical habitat should be identified and quantified in the DEIS.
	If compensatory lands are acquired, the location and management plan for these lands should be discussed in the DEIS.
	It is recommended that the BLM consult with the US Fish and Wildlife Service and prepare a Biological Opinion under Section 7 of ESA for all threatened and endangered species, particularly the desert tortoise.
	The DEIS should describe the extent of impact to habitat and threatened and endangered species from construction, installation, and maintenance activities.
	The DEIS should discuss mitigation ratios for tortoise habitat, how they relate to recommendations from other agencies, and how they relate to other renewable energy projects in California and Nevada.
Vegetation	Impacts associated with increase shade in the desert environment on vegetation and/or species should be addressed in the DEIS.
	Complete clearing and grading should be avoided and PV panels installed at height to maintain natural vegetation.
Water Resources	Complete clearing and grading should be avoided and PV panels installed at height to maintain natural vegetation and reduce impacts to drainages.
	A description of all water conservation measures should be described in the DEIS.
	A desert or ephemeral wash avoidance alternative should be created because of potential project impacts to hydrological functions and natural channels in arid ecosystems.
	A discussion on the feasibility of other water sources should be included in the DEIS.
	A qualitative discussion about impacts to water supply and the adaptability of the project to climate change should be included in the DEIS.
	An analysis of different technologies that could be used to minimize or recycle water should be included in the DEIS.

FEDERAL AGENCIES	
Water Resources (Continued)	Availability of groundwater within the basin, annual recharge rates, water right permitting process, and whether water rights have been over-allocated should be described in the EIS.
	Existing natural drainage channels and natural features (earthen berms) should be utilized.
	If groundwater is used, the DEIS should identify the potentially-affected groundwater basin and any potential for subsidence and impacts to springs and other open water bodies.
	If the project is a zero discharge facility, the amount of process water disposed onsite should be disclosed.
	Information on the functions and locations of Waters of the US should be described in the DEIS.
	Natural washes with adequate natural buffers should be used for flood control.
	Project support structures should not be placed in washes.
	Road crossings over washes should be minimized.
	The DEIS should address potential effects of project discharges to surface water quality.
	A desert or ephemeral wash avoidance alternative should be evaluated in the DEIS.
	The DEIS should consider the up-and-downstream reach and extent of water and their importance in the area.
	The DEIS should describe the original drainage patterns as well as drainage patterns during project operations.
	The estimated quantity of water the project will require and a description of the source should be included in the DEIS.
	The DEIS should provide the most current information on CWA Section 303(d) impaired waters in the project area. If there are impaired waters in the project area, the DEIS should describe how the proposed project will coordinate with on-going protection efforts.
	The DEIS should include an analysis of any adverse impacts to water quality and aquatic habitats.
	The DEIS alternatives should be consistent with the alternatives analysis required for a 404 permit, if a permit is required.

STATE AGENCIES	
Air Quality	Mitigation measures should be addressed to minimize fugitive dust emissions and fugitive dust plumes during construction.
Alternatives	A range of project alternatives should be analyzed to ensure that the full spectrum of alternatives to the proposed project are fully considered and evaluated.
Cumulative	The EIS/EIR should include a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources and specific measures to reduce those impacts.
	A cumulative impacts analysis should address impacts to plant communities and wildlife habitat associated with past, present, and anticipated future projects.
	A new commercial vehicle enforcement facility and agricultural inspection facility are being constructed at the Yates Wells Road Interchange, so traffic associated with this construction should be considered.
Cultural Resources	Confidentiality of historic properties of religious and cultural significance should be considered in the DEIS.
	NAHC recommends an ongoing consultation with the Native American tribes with regular meetings and informal involvement.
	Provisions should be made for accidentally discovered archeological resources during construction and mandate the processes be followed in the event of an accidental discovery of human remains in the project location.
	Recommends that the lead agency consider the historic context of proposed projects and to research the cultural landscapes that might include the "area of potential effect."
	The NAHC recommends avoidance to pursuing a project that would damage or destroy Native American cultural resources.
	The NAHC recommends early consultation with Native American tribes in the project area to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway and strongly encourage that the tribes (list of tribes) be contacted.
	The Native American Heritage Commission Sacred Lands File Search resulted in no Native American cultural resources identified within one-half mile of the "area of potential effect."
Wildlife	The EIS/EIR should include a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources and specific measures to reduce those impacts.
	The EIS/EIR should discuss impacts to wildlife associated with increased lighting, noise, and human activity resulting from project development.
	Impacts to biological resources associated with initial project construction as well as long-term operation and maintenance should be addressed.
	Potential impacts to biological resources and any reasonably, foreseeable physical changes in the environment as a result of the project should be quantified.
	Project impacts should be analyzed relative to their effects on off-site habitats.
	The EIS/EIR should include biological survey methods, dates, and results; these surveys should be conducted in advance of the Draft EIS/EIR.
	The EIS/EIR should present clear thresholds of significance for biological resources.
	Impacts to and maintenance of wildlife corridor/movement areas and other key seasonal use areas should be fully evaluated in the EIS/EIR.
Hazardous Materials	The EIR should evaluate whether conditions within the Project area may pose a threat to human health using the following databases of regulatory agencies: National Priorities List (USEPA), Envirostor (CA Department of Toxic Substances), RCRIS (USEPA), CERCLIS database (USEPA), SWIS database, GeoTracker, local counties and cities' material lists for hazardous substances cleanup sites and LUSTs, and the USCOE list of Formerly Used Defense Sites.
	All closure, certification, or remediation approval reports by regulatory agencies should be included in the EIR.

STATE AGENCIES	
Hazardous Materials (Continued)	An investigation should be conducted for the presence of hazardous chemicals, mercury, and asbestos for any demolished buildings, structures, asphalt or concrete-paved surface areas. Lead-based paints or products should be identified and proper precautions taken during demolition and remediated in compliance with California environmental regulations and policies.
	During project construction, if soil is contaminated, it must be disposed of properly. Soils imported to backfill any areas excavated should be sampled to ensure the imported soil is free of contamination.
	EIR should identify how to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated with the appropriate government agency providing oversight.
	Environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by the regulatory agency with jurisdiction.
	Findings of any investigations, including Phase I or II ESAs, should be summarized in the document.
	Human health and the environment of sensitive receptors should be protected and if necessary, a health risk assessment overseen and approved by the appropriate agency.
	If hazardous wastes are generated by the proposed project, the wastes must be managed in accordance with the California Hazardous Waste Control Law and the Hazardous Waste Control Regulations and the facility should obtain a Unites States EPA Identification Number. Certain hazardous waste treatment processes, handling, and storage may require authorization from the local Certified Unified Program Agency.
	If the proposed site was previously used for agricultural and/or livestock, onsite soils and groundwater should be investigated for contamination of pesticides, organic waste, etc. under the oversight and approval of the appropriate government agency.
	The Department of Toxic Substances Control can provide oversight through an environmental Oversight Agreement (EOA) for government agencies, if needed.
	The EIR should evaluate whether conditions within the Project area may pose a threat to human health using the following databases of regulatory agencies: National Priorities List (USEPA), Envirostor (CA Department of Toxic Substances), RCRIS (USEPA), CERCLIS database (USEPA), SWIS database, GeoTracker, local counties and cities' material lists for hazardous substances cleanup sites and LUSTs, and the USCOE list of Formerly Used Defense Sites.
Mitigation	CESA permitting process requirements: impacts of authorized take are minimized and fully mitigated; measures to minimize and fully mitigate impacts of authorized take are proportional to the impact to the species; meets applicant's objectives and are capable of successful implementation; adequate funding; and issuance of permit does not jeopardize the continued existence of a State-listed species.
	The CDFG does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species.
	Caltrans requests that a traffic study be prepared to address specific project impacts to I-15 and to identify the appropriate mitigation measures consistent with the Caltrans Guide for the Preparation of Traffic Impact Studies.
	Work schedules during construction should be staggered, truck deliveries should be limited to off-peak hours, and measures to ensure I-15 operates at Level of Service during peak travel time should be considered.
	Plans for restoration and revegetation should be prepared by experts in southern California ecosystems and native plant revegetation techniques.
	Revegetation plans should include a) mitigation site location; b) plant species to be used; c) schematic showing mitigation area; d) planting schedule; e) irrigation methodology; f) measures to control exotic vegetation; g) success criteria; h) detailed monitoring program; i) contingency measures; and j) responsible party.

STATE AGENCIES	
Mitigation (Continued)	Mitigation measures to reduce or eliminate impacts to surface waters should be described in the EIS/EIR.
	A mitigation agreement between the Stateline Solar Farm and the ISEGS project should be made for repair the mainline road and exits to pre-construction condition.
	Areas reserved as mitigation for project impacts should be legally protected from future direct and indirect impacts (e.g. conservation easement, monitoring and management programs, etc.).
	Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats should be thoroughly discussed in the EIS/EIR.
Permitting	The EIS/EIR must state whether the project would result in any amount of incidental take of any CESA-listed species - early consultation is encouraged and a CESA Permit may be required.
	CESA permitting process requirements: impacts of authorized take are minimized and fully mitigated; measures to minimize and fully mitigate impacts of authorized take are proportional to the impact to the species; meets applicants objectives and are capable of successful implementation; adequate funding; and issuance of permit does not jeopardize the continued existence of a State-listed species.
	If more than 1 acre of land is disturbed, the proposed project may require a Clean Water Act, section 402(p) NPDES permit or an individual storm water permit.
	The EIS/EIR should include a list of permits required for protection of water resources that may be required for the project.
	The Project proponent should consult with the U.S. Army Corps of Engineers and the California Department of Fish and Game to conduct jurisdictional determinations for surface water within the project area.
	The proposed project may require a Clean Water Act, section 401 water quality certification for impacts to federal waters or waste discharge requirements for dredge and fill impacts to non-federal waters of the state.
	The proposed project may require a NPDES permit for Limited Threat Discharges to Surface Waters.
	The proposed project may require General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality.
	The proposed project may require a Lake or Streambed Alteration Agreement with the CDFG.
	A Transportation Permit from Caltrans may be need for movement of vehicles/loads exceeding statutory limitations on size, weight, and load.
Special Status Species	The EIS/EIR should include a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources and specific measures to reduce those impacts.
	Impacts to biological resources associated with initial project construction as well as long-term operation and maintenance should be addressed.
	Potential impacts to biological resources and any reasonably, foreseeable physical changes in the environment as a result of the project should be quantified.
	Project impacts should be analyzed relative to their effects on off-site habitats.
	The EIS/EIR should include biological survey methods, dates, and results; these surveys should be conducted in advance of the Draft EIS/EIR.
	Impacts to biological resources associated with initial project construction as well as long-term operation and maintenance should be addressed.
	Potential impacts to biological resources and any reasonably, foreseeable physical changes in the environment as a result of the project should be quantified.
	Project impacts should be analyzed relative to their effects on off-site habitats.
	The EIS/EIR should present clear thresholds of significance for biological resources.

STATE AGENCIES	
Special Status Species (Continued)	A complete assessment of rare, threatened, and endangered invertebrate, fish, wildlife, reptile, and amphibian species should be included in the EIS/EIR and include seasonal variations in area use.
	A thorough assessment of rare plants and rare natural communities following the CDFG's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities should be included in the EIS/EIR (protocols attached).
	Rare, threatened, and endangered species to be addressed should include all those that meet the California Environmental Quality Act definition.
	Species of Special Concern should be considered in the EIS/EIR.
	The California Department of Fish and Game requests a complete assessment of the flora and fauna within and adjacent to the project area with particular emphasis on special status species as well as local unique species.
	The CDFG's California Natural Diversity Data Base should be searched to obtain current information on previously reported sensitive species and habitat, including Significant Natural Areas.
	The EIS/EIR should include knowledge of the regional setting to assess impacts to biological resources that are rare or unique to the region.
Transportation/Access	Caltrans requests that a traffic study be prepared to address specific project impacts to I-15 and to identify the appropriate mitigation measures consistent with the Caltrans Guide for the Preparation of Traffic Impact Studies.
	Work schedules during construction should be staggered, truck deliveries should be limited to off-peak hours, and measures to ensure I-15 operates at Level of Service during peak travel time should be considered.
	Concerned about glare impacts to drivers along I-15 from the solar panels.
	Lighting/solar panels shall not cause excessive reflected glare to south and northbound travelers on I-15.
	Concern about impacts to traffic from delivery trucks and vehicles accessing the facility from I-15; the number of truck trips per day during construction should be identified and the impacts should be disclosed.
	Should the Stateline Solar Farm and ISEGS projects' have overlapping construction schedules, a Transportation Control Plan should be develop to reduce traffic congestion.
	The appropriate traffic signage should be posted for construction traffic throughout the construction period.
	The Stateline Solar Farm and the ISEGS project should coordinate construction phases since the projects will be using the same roads.
Vegetation	Ground disturbance that would facilitate infestations by exotic and invasive species should be addressed.
	The EIS/EIR should include a detailed vegetation map overlaid on an aerial photograph so that vegetation communities in the project area can be identified.
	The EIS/EIR should include a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources and specific measures to reduce those impacts.
	The EIS/EIR should include a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources and specific measures to reduce those impacts.
	Impacts to biological resources associated with initial project construction as well as long-term operation and maintenance should be addressed.
	Potential impacts to biological resources and any reasonably, foreseeable physical changes in the environment as a result of the project should be quantified.
Visual Resources	All temporary construction lighting should not be visible from beyond the solar site.
	Concerned about glare impacts to drivers along I-15 from the solar panels.

STATE AGENCIES	
Visual Resources (Continued)	Lighting/solar panels shall not cause excessive reflected glare to south and northbound travelers on I-15.
	All temporary construction lighting should not be visible from beyond the solar site.
Water Resources	Beneficial surface water uses should be identified in the EIS/EIR, the potential impacts to beneficial water uses should be disclosed, and mitigation measures to minimize impacts should be described in the EIS/EIR.
	Concerned about the collection of storm water runoff into channels and discharge of storm water to natural drainage systems.
	Design alternatives to maintain the existing hydrology of the site and/or redirect excess flow to reduce permeability should be considered.
	Potential impacts that hydrologically modify natural drainage systems from project construction should be identified in the EIS/EIR.
	Temporary and permanent impacts to surface waters should be described and quantified in the EIS/EIR.
	The California Regional Water Quality Control Board requests that the project comply with the policies in the Basin Plan in the hydrology and water quality analyses and require that the Project proponent comply with all applicable water quality standards.
	The EIS/EIR should evaluate all potential storm water impacts, describe control needed during construction, mitigation for post-construction hydrologic impacts, and description of BMPs.
	The EIS/EIR should include a map identifying all surface water resources within the vicinity of the Project area and a narrative discussion of the delineation methods used to discern those features in the field.
	The EIS/EIR should address impacts associated with truncation, realignment, channelization, lining, and/or filling of surface water resource that could impair riparian habitat or changes to the hydrology that would exacerbate flooding, erosion, and scouring.
	Unavoidable impacts to waters of the State (CA) must be mitigated to ensure that no net loss of function and value will occur from Project development.
	If the project site has the potential to support aquatic, riparian, or wetland habitat, a jurisdictional delineation of lakes, streams, and associated riparian habitats potentially affect should be provided for agency and public review.
	The EIS/EIR should demonstrate that the project will not result in a net loss of wetland habitat values or acreage.

ORGANIZATIONS	
Air Quality	Concerned about long-term air quality degradation to Primm.
	The DEIS needs to analyze the health impacts from airborne particulates from construction dust.
	The DEIS should analyze the potential impacts from removal of plants, caliche layers and biological soil crust and whether the new solar plant would actually offset greenhouse gases.
	The DEIS should provide detail analysis on the amount of SF6 gases from transmission lines that the proposed project would release.
	The DEIS should quantify the amount of greenhouse gas used for construction; the amount of fossil fuels for worker vehicles and multiply by a 30-year lifespan.
	The EIS should address the carbon footprint of the project and any losses to carbon storage and sequestration it will engender.
Alternatives	The alternatives analysis should included distributed generation of renewable energy in the built environment and/or an alternative on already degraded land.
	The Desert Tortoise Council comments that the EIS/EIR should include an alternative designed to conserve wild desert tortoise populations in the Ivanpah Valley and that this Conservation Alternative be designate the "preferred alternative."
	Alternatives for the Stateline project should include the No Action Alternative that designates the proposed site inappropriate for solar energy development.
	Alternatives should be considered at the load centers, but the entire state for efficiency.
	BLM should adopt "Invalid Public Land Energy Applications Alternative" and should consider canceled applications as alternatives.
	Distributed generation in the built environment should be given a full analysis as a viable alternative.
	Site-specific alternatives that avoid cultural sites or sensitive species should be considered in the alternatives analysis.
	The BLM should consider an alternative called the No Action and Designates the Project Site as part of an Area of Environmental Concern"; the Basin and Range Watch has nominated the Ivanpah Valley to be considered an Area of Critical Environmental Concern.
	The EIS should analyze a full range of alternatives as required by NEPA, following the NEPA guidelines; most specifically noting that reasonable alternatives not within the jurisdiction of the lead agency should be included.
	The Stateline project should evaluate alternatives not within the jurisdiction of the lead agency including a Distributed General Alternatives and a Private Land Alternative.
	Viable and reasonable alternatives that serve as solutions benefiting everyone should be considered.
	Alternative sites, such as previously disturbed lands, brownfield, retired agricultural lands, or those identified in the Solar PEIS Solar Energy Study Zones, should be considered.
	Alternatives should include alternative locations and reduced project size.
	Recommends that BLM pay close attention to developing accurate and factual sections of the NEPA document for the proposed Stateline Project for the alternatives to the proposed action.
	A Conservation Alternative for the desert tortoise would give the appropriate weight to the Federal mandate to protect and conserve the species, provide protection for a large, healthy and reproducing population; would protect lands essential to ensuring unfragmented habitat; and would implement Section 7 to reduce development in Ivanpah Valley.
	A Conservation Alternative for the desert tortoise would preclude further development in the Ivanpah Valley by setting aside remaining public lands for conservation.
	Designation of a Conservation Alternative for the desert tortoise would preclude siting the proposed project on the 2,000 acres and could be accomplished through a CDCA Plan amendment.
	The alternatives analysis should thoroughly address other locations.
	Recommends alternative configuration for the proposed project that would place land disturbance closer to the Ivanpah Dry Lake where few desert tortoises are located and are less crucial to population connectivity.

ORGANIZATIONS	
Alternatives (Continued)	Recommends alternative configuration for the proposed project that would place ground disturbance on lands closer to I-15 where there is a lower desert tortoise density.
	The range of alternatives must be carefully developed as a means to avoid and/or minimize adverse impacts to public lands and resources.
Cumulative	Construction of the proposed solar and wind projects throughout the region will cumulatively impact the visual character of traditional use areas.
	Concerned that only a cumulative impact analysis will be conducted as part of the NEPA document for the Stateline Project instead of a comprehensive ecological assessment of the entire valley.
	Cumulative effects to golden eagles from all the proposed projects in the area should be addressed.
	Concerned that the proposed project, in addition, to other projects in the area would contribute to a local extinction event of the desert tortoise in Ivanpah Valley.
	The NEPA document must provide a detailed analysis of direct, indirect, and cumulative impacts of the proposed project, including roads and transmission lines, on the desert tortoise population.
	Concerned about project impacts to the Desert tortoise and their high-quality habitat in the Ivanpah Valley as a result of other solar project already under construction.
	With the additional projects in the area, the Ivanpah Valley desert tortoise populations will be severely compromised.
	The cumulative analysis should include the introduction of transmission and potential to open more lands to energy development.
	The DEIS must analyze the cumulative effect of this project with other planned project including grazing, off road vehicle activity, energy projects, and mining.
	A cumulative impacts analysis of all the known projects in the Ivanpah Valley should be a part of this EIS.
	Concerned that there is no regional conservation plan for Ivanpah Valley because the California/Nevada border divides the valley between two State BLM jurisdictions and therefore, no meaningful cumulative impacts analysis of all the renewable energy, mining, and transportation projects can be conducted.
	The cumulative effects analysis should include the effects of the current project, proposed development, and foreseeable projects and their effect to the Mojave National Preserve and the Ivanpah Project. Projects that should be included: State of California Agricultural Station, DesertXpress high Speed Rail, Brightsource's ISEGS, First Solar's Silver State SEGS, Mountain Pass lateral expansion, the Ivanpah Airport, and other proposed gas pipelines or electrical transmission lines.
	The EIS/EIR must consider all cumulative impacts from the numerous proposed projects in the Ivanpah Valley.
	Cumulative impacts need to analyzed in the context of various laws and regulations pertaining to public lands in the CDCA (ESA, FLPMA, BLM Manuals, etc.).
	Cumulative impacts of the proposed project and other existing and reasonably foreseeable land uses on at-risk species and their habitats on a regional scale need to be carefully analyzed.
	The BLM and USFWS should consider the cumulative impacts to the Desert Tortoise from the ISEGS project in addition to the proposed Stateline project.
	The following projects and their cumulative effects should be considered in the EIS: ISEGs, I-15 Freeway, gas and electrical transmission facilities, Silver State solar project - existing and proposed, Joint Port of Entry station - proposed, High Desert Xpress railroad, Ivanpah airport - planned, and Kern River Gas Pipeline extension - proposed.
Opinion	Basin and Range Watch refers to a petition that would nominate public lands in Ivanpah Valley as an Area of Critical Environmental Concern and would preclude construction of the Stateline Solar Project.
	A regional ecological assessment is needed for the Ivanpah Valley in California and Nevada to inform the approval of additional project proposals.
	The BLM should consider statements made in the ISEGS Biological Opinion recommends BLM amend its land use plan "to prohibit large-scale development within all remaining portions of the Ivanpah Valley."

ORGANIZATIONS	
Opinion (Continued)	The Western Lands Project opposes the siting of large renewable-energy project on undeveloped public land.
	The BLM has allowed energy projects to take precedent over responsibility to preserve biological, cultural, and the visual integrity of Ivanpah Valley.
	Supports responsible development of energy project by siting projects on private or severely altered lands located close to points of use to minimize new disturbance.
	Comprehensive, pro-active planning to develop renewable resources with federal government and the state is needed to identify the appropriate locations for renewable project development.
	In seeking to meet California's renewable portfolio, projects should be designed in the most sustainable manner possible and that project approvals are expedited in a manner that does not sacrifice the fragile desert and wildlife.
Cultural Resources	The DEIS should discuss and analyze all impacts to paleontological and Native American cultural resources.
	Alluvial fans of the Ivanpah Valley have high cultural value for the Chemehuevi, Mohave, and Paiute; cultural uses of the alluvial fans and flats in the Ivanpah Valley should be preserved.
	Concern about impacts to prehistoric sites, rock shelters, ancient creosote rings, and other cultural artifacts.
	Concern that transmission line construction could affect cultural artifacts with increased soil disturbance as well as weed invasion and exposure to looters.
Wildlife	A land use examination of the Ivanpah Valley should determine which areas should be avoided to reduce conflict with desert tortoise habitat and know pathways for desert wildlife and migratory birds.
	The DEIS should describe mitigation efforts for the burrowing owl and American badger.
	The EIS should analyze potential impacts to sensitive animals and provide wildlife maps to facilitate public input.
	Concern about soil erosion on low fill slopes and steeply graded areas could result in sedimentation of water bodies that could impact rare plants and habitats for sensitive species, particularly burrowing species such as the desert tortoise.
	The EIS/EIR needs to address the potential indirect and direct affect to Golden eagles as well as their habitat.
	Concern about impacts to the Bald and Golden Eagle from loss of foraging habitat resulting from project development.
	Concerns about impacts to avian species, including California BLM sensitive species from loss of nesting and foraging habitat.
	The DEIS should address the destruction of potential bighorn sheep, a BLM Species of Concern, foraging and migration corridor habitat from project development.
	Concern about impacts to sensitive bird species, including the Golden Eagle that are known to be present at the site.
	The EIS should analyze risk of bird collision from PV panels.
	Impacts to wildlife from polarized glare should be addressed in the EIS/EIR.
	Consideration should be given to large scale solar plants being sited away from load centers to avoid impacts to biological resources and cumulative impacts to visual scenery from solar plant development.
	Concern about impacts to resident and migratory raptors from project development.
	Concern about the impacts of polarized glare from large photovoltaic facilities to birds and insects.
	The DEIS should address mitigation measures for protecting rare migratory breeding birds and the unique "sky-island" habitat in Clark Mountains.
	The Clark Mountain has an Important Bird Area supporting populations of rare birds that move between Clark Mountain to the east across Ivanpah Valley where the project is located. Because of the project's location to the Primm golf course, which has water features that attract birds, there is concern about impacts to avian species.

ORGANIZATIONS	
Wildlife (Continued)	The NEPA document must analyze all direct, indirect, and cumulative impacts to the desert bighorn sheep including impacts to linkage habitat and connectivity. The proposed project site is located on a bajada used by the bighorn sheep for foraging.
	A multi-year wildlife survey is needed to fully understand how the project will affect area wildlife.
	Concerned about impacts to bird species, such as the LeConte's thrasher, which inhabits the area and is on a decline.
	The EIS should describe mitigation measures to compensate for the loss of wildlife habitat.
Hazardous Materials	Concern about the impacts from panel breakage and damage and the effects of CdTe leaching into the environment.
	The DEIS should outline the impacts of a potential CdTe (Cadmium-Telluride) pollution event and how it could impact public health, water resources, and flora and fauna.
	The DEIS should disclose any potentially toxic or hazardous wastes that my be associated with project construction, operation, and maintenance including pesticides and herbicides.
Lands and Realty	A land use examination of the Ivanpah Valley should determine which areas should be avoided to reduce conflict with desert tortoise habitat and known pathways for desert wildlife and migratory birds.
	Concern about industrialization of Ivanpah Valley and the effects to private lands within Mojave National Preserve.
	A land use examination of the Ivanpah Valley should include a determination of whether there are lands suitable for renewable energy development and whether the development can be mitigated.
	Based on the California Desert Conservation Area (CDCA), the Stateline Project would be built on Class L lands, which is inconsistent with the management objective.
	A comprehensive examination of land use in Ivanpah Valley on both sides of the state line should be conducted.
Mitigation	Mitigation lands within the Mojave National Preserve should be identified.
	The DEIS should describe mitigation efforts for the burrowing owl and American badger.
	Requests that impacts to the Mojave National Preserve's viewshed and wildlife connectivity be examined from points in the northeastern Preserve and the Clark Mountain exclave.
	The DEIS should describe mitigation measures to reduce the impacts from removal of biological soil crust.
	The EIS/EIR must address how loss of connectivity and intact habitat for rare plant species will be mitigated.
	Concern about the effectiveness of translocating tortoises to the Mesquite Valley over the Clark Mountain Range and whether that population of desert tortoise is the same genetic population as the Ivanpah Valley population.
	The DEIS should describe mitigation and plans for relocation for the Gila monster.
	If a relocation plan for the desert tortoise is proposed, it should describe in detail information about other successful relocation projects and a post-location monitoring plan should be spelled out.
	Question about new roads and whether roads will have tortoise fencing and how will fencing affect habitat fragmentation.
	The DEIS should describe measures to avoid rare plants.
	The DEIS should describe mitigation measures to reduce impacts from removal of 2,200 acres of unique botanical resources in Ivanpah Valley.
	An analysis on the effectiveness of the applicant's Avian Protection Plan should be conducted.
	Compensation habitat for desert tortoise, rare plants, and other special status species should be considered.
	Monitoring programs should be described and include timelines, costs, and sources of funding for the monitoring programs.
	Restoration and rehabilitation activities should be described in the EIS for habitat disturbed during construction.
	The DEIS should describe all mitigation measures that meet the criteria of regulation.

ORGANIZATIONS	
Mitigation (Continued)	Concerned about tortoise fencing surviving flood events.
	The decommissioning plan should include a plan for restoration of the area disturbed by the project.
	The EIS should include an analysis of available mitigation lands.
NEPA Process	The transition toward clean energy should be carefully planned to ensure a proper balance of near term effects and long-term impacts have been considered.
	Recommends amending the CDCA Plan to prohibit large-scale development within the area bounded by I-15, the state line, and Clark Mountains.
	Effects of the proposed project on management policies in the CDCA Plan should be identified and analyzed.
Out of Scope	Basin and Range Watch refers to a petition that would nominate public lands in Ivanpah Valley as an Area of Critical Environmental Concern and would preclude construction of the Stateline Solar Project.
	A regional ecological assessment is needed for the Ivanpah Valley in California and Nevada to inform the approval of additional project proposals.
	Incentive programs for distributed generation, such as in Germany, should be considered rather than building solar facilities in remote areas.
Paleontological Resources	The DEIS should discuss and analyze all impacts to paleontological and Native American cultural resources.
Permitting	Recommends amending the CDCA Plan to prohibit large-scale development within the area bounded by I-15, the state line, and Clark Mountains.
	Effects of the proposed project on management policies in the CDCA Plan should be identified and analyzed.
	Recommends that land use plans be amended to prohibit large-scale developing within the remaining portions of Ivanpah Valley to reduce fragmentation within the critical linkage between the Ivanpah Critical Habitat Unit and the Eldorado Critical Habitat Unit.
Project Description	The EIS/EIR should address impacts that will continue beyond decommissioning because of the long-term recovery of fragile desert ecosystems.
	The Primm Entities expressed concern about the proposed relocation of their pipeline, power line, access road, and access to their water well and the ability to maintain those wells.
	Information about decommissioning for the project and the associated bonding to carry out the plan should be included in the EIS.
	Attached "Renewable Siting Criteria for California Desert Conservation Area" prepared by environmental stakeholders.
Public Health and Safety	A fire study of the solar panels should be conducted with panels in a diagonal position.
	Concern about that increased workers will result in an increase of vandalism, harassment of wildlife, and additional law enforcement problems.
	The DEIS should address the effects of wildfire risks for each alternative.
	Concern expressed about impacts to human health from Valley Fever, common in desert communities when dust is stirred up.
Public Involvement	Concern that comments made during a previous public meeting held by First Solar will not go on the record and it appears that First Solar has management authority over the BLM.
	Concerned that the scoping meeting did not allow for a sufficient question and answer session and that BLM should have extended the scoping for comment deadline as designated in the in Sec. 601 [43 U.S.C. 1781](a) section 6 of FLPMA.
Purpose and Need	A Master comprehensive plan should be developed, integrating various fuels mixes, determining whether additional capacity is needed before siting solar plants in the wildlands.
	Basin and Range Watch requests that the Purpose and Need Statement reflect a need to protect and preserve habitat for sensitive species and important ecological habitats as stated in the goals of Section 4 in Secretarial Order 3283.

ORGANIZATIONS	
Purpose and Need (Continued)	Purpose and need should not simply state that BLM is responding to an applicant's right of way application.
	Recommends that BLM pay close attention to developing accurate and factual sections of the NEPA document for the proposed Stateline Project for the purpose and need.
Recreation	Should runoff be diverted through washes under I-15, the DEIS should analyze impacts to soils east of the project and recreational use on the Ivanpah Dry Lake.
Soils	The DEIS should describe mitigation measures to reduce the impacts from removal of biological soil crust.
	Should runoff be diverted through washes under I-15, the DEIS should analyze impacts to soils east of the project and recreational use on the Ivanpah Dry Lake.
Special Status Species	The EIS/EIR alternatives analysis should include an Area of Critical Environmental Concern Designation alternatives developed and advance by Basin & Range Watch in recognition of the special cultural, visual, and botanical resources of the Ivanpah Valley and the potential impacts to the desert tortoise population.
	Concerned about potential impacts to the unique and significant connectivity between desert tortoise populations in the Ivanpah Valley.
	Project impacts would reduce existing high quality desert tortoise habitat.
	The BLM should ensure that desert tortoise survey protocol for this project is correctly applied to address the faulty surveys of other area projects.
	Concerned about protecting the habitat in Ivanpah Valley because of the recent identification of the *Gopherus morafkai*, which could reduce the distribution of the *Gopherus agassizii*.
	Based on recent biological assessments and findings in studies, conservation measures are needed in Ivanpah Valley to ensure survival and viability of the Desert tortoise population.
	Concern that the several proposed projects in Ivanpah Valley would block Desert tortoise connectivity and severely impact gene flow between Desert tortoise Recovery Units.
	The connectivity function provided by the Ivanpah Valley for Desert tortoises cannot be replaced by mitigation measures and the habitat should be avoided and protected.
	Concern about the project's direct, indirect, and cumulative impact on the desert tortoise including habitat loss and fragmentation, loss of connectivity, increase in predation, increased human presence, and use of roads.
	Detailed surveys are required to determine the number of tortoises that would be impacted as well as consider the status of tortoises in the affected recovery unit.
	Large-scale translocation of desert tortoises must be in conformance with approved RMPs; the CDCA does not consider large-scale desert tortoise translocation. Therefore, the BLM will need to amend the CDCA Plan or develop a plan for the project. A detailed plan must be included in the NEPA documentation.
	The NEPA/CEQA document must describe, characterize, and identify the desert tortoise population that will be impacted by alternative.
	The Stateline Solar project is located in prime desert tortoise habitat in Ivanpah Valley, which is a poor location choice for development.
	Use of the project site will impact connectivity between the Ivanpah Valley desert tortoise population and the Mesquite Valley populations, which would reduce gene flow and severely impact desert tortoise recovery.
	Concerned about long-term planning to preserve the desert tortoise population in Ivanpah Valley.
	BLM should establish policies that will conserve Desert tortoises and their habitat in the Ivanpah Valley and their interconnection with populations in the Eastern Mojave and Northeastern Mojave Recovery Units.
	Maintaining Desert tortoise habitat connectivity is considered essential for maintaining Desert tortoise populations through gene-flow and there is concern that the proposed project will adversely affect this connectivity.

ORGANIZATIONS	
Special Status Species (Continued)	The BLM in consultation with the USFWS should fully analyze and disclose the implications that the new proposed project would have on the continued viability of the Desert Tortoise west of I-15 and determine 1) how and where habitat connectivity and gene-flow occurs, and 2) how it can be maintained and enhanced.
	The BLM must ensure that any additional renewable energy projects within occupied desert tortoise habitat in this area, or that increase fragmentation in the valley, will not jeopardize the tortoise population.
	The BLM should address a robust habitat conservation strategy for the entire Ivanpah Valley to contribute to the conservation and recovery of the Desert Tortoise.
	The proposed Stateline Project location would significantly fragment and contribute to the loss of habitat connectivity for the Desert Tortoise.
	The USGS desert tortoise habitat model should be used as part of the global climate change analysis to determine likely changes in desert tortoise habitat quality.
	Concerned about project impacts to the Desert tortoise and their high-quality habitat in the Ivanpah Valley as a result of other solar project already under construction.
	With the additional projects in the area, the Ivanpah Valley desert tortoise populations will be severely compromised.
	The EIS/EIR needs to address the potential indirect and direct affect to Golden eagles as well as their habitat.
	Concern about impacts to the Bald and Golden Eagle from loss of foraging habitat from project development.
	Concerns about impacts to avian species, including California BLM sensitive species from loss of nesting and foraging habitat.
	Concern about impacts to sensitive bird species, including the Golden Eagle that are known to be present at the site.
	Concern about the effectiveness of translocating tortoises to the Mesquite Valley over the Clark Mountain Range and whether that population of desert tortoise is the same genetic population as the Ivanpah Valley population.
	The DEIS should describe mitigation and plans for relocation for the Gila monster.
Special Designation Areas	The California Desert Protection Act of 1994 and Wilderness Act of 1964 must be considered within the LORS section of the EIS analysis.
	Requests that impacts to the Mojave National Preserve's viewshed and wildlife connectivity be examined from points in the northeastern Preserve and the Clark Mountain exclave.
	Concern about industrialization of Ivanpah Valley and the effects to private lands within Mojave National Preserve; mitigation lands within the Preserve should be identified.
Transportation/Access	Construction traffic will impact Primm and requests that any traffic analysis or study include Primm, Nevada.
Vegetation	Concerns about introduction and spread of invasive weeds and non-native plants during construction.
	Concern about preserving habitat of numerous rare plants (list provided in comment letter) and genetic diversity and connectivity with surrounding areas.
	Concern about the spread of non-native plant species colonizing in the project site from ground disturbance during construction.
	Concerns about the effects of using herbicides on the environment to control the spread of weeds.
	Question about surveys for *Muilla coronata* in the project area.
	Requests that independent botanists identify the Penstemon species in the project area.
	Concerned that the transmission line will established a "weed corridor" that will be difficult to remove.
	The EIS should analyze potential impacts to all rare plant species that could be affected by the project.
	The EIS should consider how invasive plants and weeds will be managed and controlled.
	The EIS/EIR must address how loss of connectivity and intact habitat for rare plant species will be mitigated.

ORGANIZATIONS	
Vegetation (Continued)	Measures to avoid rare plants should be described in the DEIS.
	The DEIS should describe mitigation measures to reduce impacts from removal of 2,200 acres of unique botanical resources in Ivanpah Valley.
Visual Resource Management	The visual resources analysis should include angle of observation, length of time the project is in view, and the relative size or scale of the project compared to the surroundings in the Ivanpah Valley.
	The visual simulations must account for the polarized glare produced by the photovoltaic panels.
	Visual simulations should be conducted that show various angles of light and time of day to assess the proposed project's impact to visual resources.
	KOP simulations should depict not only flat black solar panels, but also the reflectivity of thin film photovoltaic panels.
	The DEIS should evaluate two KOPs from the Stateline Wilderness Are, California from a lower and higher elevation, three KOPs from the Mojave Natural Preserve (two from Clark Mountain, one from south of I-15), three dark sky KOPs from different locations from wilderness areas and the Mojave National Preserve, and at least one KOP depicting dust plumes from project construction.
	The EIS should analyze impacts on visual resources including the effects on wilderness character and values because of its close proximity to the Mojave National Preserve and designated Wilderness Areas.
	Consideration should be given to large scale solar plants being sited away from load centers to avoid impacts to biological resources and cumulative impacts to visual scenery from solar plant development.
	Requests that impacts to the Mojave National Preserve's viewshed and wildlife connectivity be examined from points in the northeastern Preserve and the Clark Mountain exclave.
Water Resources	A detailed groundwater study that includes modeled estimates of the influence of the Project's proposed groundwater extraction on existing permitted water rights and users in the Ivanpah Valley should be provided.
	Concern about the effects to groundwater quality with increased groundwater extraction in the southern portion of the Ivanpah Valley.
	Primm South Real Estate Company is concerned about the amount water required for construction of the proposed project and the effects to two permitted groundwater wells (WP-5 and WP-6) located within the proposed project's right-of-way.
	The DEIS should evaluate the impacts of landscape alteration to groundwater recharge, whether detention basins will be built, and whether runoffs would impact embankments on I-15.
	With approximately 3-acre feet of water per year used for panel washing, the DEIS should analyze the impacts of drawdown to the aquifer
	The EIS should disclose the water needs of the project and analyze those impacts to the local and regional water reserves.
	Drainage across the alluvial fan where the project is proposed needs to be addressed in the EIS (diversion of flood waters or sheet flooding).
	Flood potential and reduced aquifer recharge from the removal of thousands of acres of desert pavement in the region should be evaluated in the DEIS.

INDIVIDUALS	
Alternatives	The BLM should evaluate alternatives sites such as the already-disturbed lands near Newberry Springs.
	Rooftop solar should be considered as an alternative to the proposed Stateline Solar project.
Cumulative	Cumulative impacts to desert tortoise populations and viability of a wildlife corridor should be considered in the EIS/EIR
	Concerned about visual impacts that will compound with visual impacts from the ISEGS project.
	If the project is approved, it should be smaller in size; otherwise, it will compound the impacts from the nearby ISEGS project.
Opinion	Supports the use of rooftop solar panels versus solar facilities the spoil natural land resources.
	Photovoltaic panels should be constructed on roof tops, parking lots, brown spaces, along highways, or other brown zones.
	Power generation should be closer to the end user, which is more efficient.
	Supports rooftop solar panels because it is more efficient and does impact the desert.
	Supports rooftop solar panels on lands already disturbed by development.
	Supports the construction of the proposed project.
	BLM is being negligent to approve destruction of land resources for solar development
	Opposes the proposed Stateline Project.
	Concerned that construction workers are not environmentally trained.
	Once the solar farm is constructed, the destruction to our wilderness will be permanent.
	Opposes the proposed project because it is inefficient and environmentally destructive.
	Strongly opposes project and wants to preserve the diminishing wild places.
	Does not support the project because of its effects on the desert.
	Creating "green" energy at the cost of some of the last pristine land is needless.
	Transmission lines that would be required for this project will degrade the efficiency of this project.
	Does not support the proposed solar project on public lands.
Wildlife	Concerned that topographic changes from solar plant development would adversely alter water flow, plant life, and native insect and animal life.
	Concerned about impacts to ancient Joshua trees, wildlife, and untouched wilderness.
Lands and Realty	The EIS should analyze the effects on Mojave National Preserve lands and the resulting impacts to lessee from added grazing pressure on grazing permitted lands within the Mojave National Preserve.
	The proposed project decimates the area and is inconsistent with the Desert Conservation Area Plan and the Northern and Eastern Mojave Plan.
Livestock Grazing	The EIS should analyze the effects on Mojave National Preserve lands and the resulting impacts to lessee from added grazing pressure on grazing permitted lands within the Mojave National Preserve.
	The combined impacts of the ISEGS solar project and the proposed Stateline Solar projects reduce rancher's ability to properly manage range conditions and destroy the economic viability of ranching operations.
	A thorough analysis of impacts to livestock grazing management should be conducted in the EIS.
	Concern about impacts to the OM Ranch, a Lessee of the Clark Mountain Grazing Allotment with contiguous grazing lease on Mojave National Preserve Lands, and request a full range of meaningful alternatives be considered and addressed in the EIS.
	Concern about the proposed project upholding the objectives of BLM's Grazing Regulations or the approved plan amendment to the CDCA.
	The proposed project would impact cattle ranching in the Mojave Desert and will reduce ranchers' ability to operate within the terms and conditions of personal Allotment Management Plan and 10-year lease with BLM.
Mitigation	Mitigation measures in place for the ISEGS project should be applied to the Stateline Solar Project.
Out of Scope	Supports the use of rooftop solar panels versus solar facilities the spoil natural land resources.
	Photovoltaic panels should be constructed on roof tops, parking lots, brown spaces, along highways, or other brown zones.
	Power generation should be closer to the end user, which is more efficient.

INDIVIDUALS	
Out of Scope (Continued)	Supports rooftop solar panels because it is more efficient and does impact the desert.
	Supports rooftop solar panels in the city on already development land and brown sites.
	Supports rooftop solar panels on lands already disturbed by development.
	Prefers the use of rooftop solar panels rather than construction of the proposed Stateline Solar project.
Public Involvement	Rancher request to enter into a full consultation, cooperation, and coordination with the BLM.
	Requests a 120-day extension to the scoping comment period so that others in the livestock and associated industries are allowed time to comment on the proposed project.
Recreation	Opposes the proposed Stateline Solar project because of its impacts to camping and recreation on BLM lands.
	Concerned about the potential for increased deposit of sediment on the dry lake bed and the potential impacts to recreation.
Socioeconomics	The combined impacts of the ISEGS solar project and the proposed Stateline Solar projects reduce rancher's ability to properly manage range conditions and destroy the economic viability of ranching operations.
Special Status Species	The EIS/EIR should consider potential impacts to the Penstemon bicolor, Penstemon palmeri, Muilia coronata, cave-dwelling evening primrose, and other plant species.
	Concerns about impacts to the desert tortoise from construction of the proposed project.
	Concern about the hindrance of genetic connectivity for the threatened desert tortoise, destroying its habitat and preventing north-south movement through the Ivanpah Valley.
	The EIS/EIR should consider impacts on already translocated desert tortoise by the nearby Ivanpah Solar Electric Generating project.
	The EIS/EIR should evaluate potential impacts to Golden Eagle habitat known to be active in the area.
	Concerned about project impacts to the desert tortoise.
Vegetation	Concerned that topographic changes from solar plant development would adversely alter water flow, plant life, and native insect and animal life.
	Concerned about impacts to ancient Joshua trees, wildlife, and untouched wilderness.
	Concerned that solar project will impact habitat for plants and native species.
	Concerned about impacts to local populations of sensitive plant species such as the mojave milkweed, desert pincushion, Parish's club-cholla, and Ruby's desert mallow.
	Succulants, including the mojave yucca, should be salvaged.
Water Resources	Concerned about potential drainage from the project during strong storms and the potential to degrade habitat south and east of the I-15 in the DWMA.