

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
3	4	ACEC	18	6	This project has the potential to affect the groundwater sources of an ACEC.	Based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC.
47	14	ACEC	18	6	How does the public get to know if each turbine will impact groundwater in the Swamp Cedar ACEC when analysis will be done after approval?	Analysis would not be conducted after approval; instead, site-specific geotechnical investigations would be conducted to finalize the turbine foundation designs and develop necessary Best Management Practices. Additionally, the intent of the site-specific investigations is to ensure that construction activities do not puncture and dewater the aquifer. They would not impact the hydrology of the Swamp Cedar ACEC.
48	14	ACEC	18	6	The project site is right next to a sensitive and unique wetland, and should be moved to an already disturbed area outside of the groundwater basin so as not to impact this wetland, Swamp Cedar ACEC.	Although the Swamp Cedar ACEC vegetation community is dependent on the existing hydrologic conditions, it is not considered a "wetland." Additionally, based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC.
45	14	ACEC	18	6	The project would be built next to the Swamp Cedars Area of Critical Environmental Concern. The unique Swamp Cedars Area of Critical Environmental Concern lies on a "perched water table," where seasonal wetlands and springs are common, and allowing a savanna of junipers to come down from high elevations.	Section 3.11.2 of the Preliminary EA discloses the location of the Swamp Cedar ACEC relative to the project area and the resources for which it has been designated, including the unique plant community which is dependent on the existing hydrologic conditions.
46	14	ACEC	18	6	We are very concerned that the construction of the project will disrupt the delicate hydrology of the ACEC causing localized cone of depression effects that would dry up parts of the ACEC. We do not believe it is wise for BLM to allow the project so close to this habitat.	Based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC.
7	14	ACEC	18	10	The EA states that further geotechnical investigations will be conducted at the site of the placement of each turbine. Please describe the potential impacts that geotechnical investigations would have on hydrology relating to cone of depression effects on the swamp Cedars Area of Critical Environmental Concern.	The site-specific geotechnical investigations are being conducted to finalize the turbine foundation designs and necessary Best Management Practices. The investigations would not impact the hydrology of the Swamp Cedar ACEC. The turbine foundations are projected to be approximately no deeper than 8 feet below ground surface. Based on the hydrology report (Kleinfelder 2010), the depth to groundwater is between 14.5 and 40.5 feet below ground level. Accordingly, excavation for turbine foundations should not encounter or affect the aquifer. There will be no cone of depression.
6	17	ACEC	1	9	Some of the issues that we believe were not adequately addressed include the location next to an ACEC that contains both sensitive plants and cultural resources.	Section 4.11.2.2 of the Preliminary EA describes the effects of the proposed action on the adjacent Swamp Cedar ACEC. Sections 4.6 and 4.7 of the Final EA have been revised to include a more detailed description of the effects of the proposed action and alternative on both cultural resources and Native American religious concerns.
2	26	ACEC	18	9	This action will also involve an investment of hundreds of millions if not billions of dollars in placing a series of very expensive turbines in the center of a unique Great Basin valley with severe aquifer and de-watering concerns. The waters have been targeted in the notorious and highly controversial SNWA aquifer mining scheme, referred to as the Las Vegas "water grab". The immediately adjacent Swamp Cedar ACEC is highly vulnerable to changes in ground water in supporting unique vegetation communities.	Based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC. Because the construction water will be leased from an existing agricultural user pursuant to a permit from the Nevada Division of Water Resources for a temporary change in the manner and place of use, the construction water use will displace a similar volume of agricultural use during the construction period, and accordingly, there will be no net increase in water diversion in the basin as a result of the SVWEF. Section 2.1.1.2.12 of the Final EA has been revised to clarify water use.
34	29	ACEC	18	6	How does the public get to know if each turbine will impact groundwater in the Swamp Cedar ACEC when analysis will be done after approval? This violates the public involvement central to NEPA.	Analysis will not be conducted after approval - site-specific geotechnical investigations would be conducted to finalize the turbine foundation designs and develop necessary Best Management Practices. Additionally, the intent of the site-specific investigations is to ensure that construction activities do not puncture and dewater the aquifer. They would not impact the hydrology of the Swamp Cedar ACEC.
7	29	ACEC	18	6	The EA stated that further geotechnical investigations will be conducted at the site of the placement of each turbine. Please describe the potential impacts that geotechnical investigations would have on hydrology relating to cone of depression effects on the Swamp Cedars Area of Critical Environmental Concern.	Analysis would not be conducted after approval; instead, site-specific geotechnical investigations would be conducted to finalize the turbine foundation designs and develop necessary Best Management Practices. Additionally, the intent of the site-specific investigations is to ensure that construction activities do not puncture and dewater the aquifer. The turbine foundations are projected to be approximately no deeper than 8 feet below ground surface. Based on the hydrology report (Kleinfelder 2010), the depth to groundwater is between 14.5 and 40.5 feet below ground level. Accordingly, excavation for turbine foundations should not encounter or affect aquifer. There will be no cone of depression. They would not impact the hydrology of the Swamp Cedar ACEC.
32	29	ACEC	18	6	The project would be built next to the Swamp Cedars Area of Critical Environmental Concern. The unique Swamp Cedars Area of Critical Environmental Concern lies on a "perched water table," where seasonal wetlands and springs are common, and allowing a savanna of junipers to come down from high elevations.	Section 3.11.2 of the Preliminary EA discloses the location of the Swamp Cedar ACEC relative to the project area and the resources for which it has been designated, including the unique plant community which is dependent on the existing hydrologic conditions. The project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC. Further, the hydrology study found that the water table is at least 14.5 feet down and the turbine footings would not be dug that deep; therefore, puncturing the water table would be highly unlikely.

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33	29	ACEC	18	6	We are very concerned that the construction of the project will disrupt the delicate hydrology of the ACEC causing localized cone of depression effects that would dry up parts of the ACEC. We do not believe it is wise for BLM to allow the project so close to this habitat.	Based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC.
35	29	ACEC	18	9	The project site is right next to a sensitive and unique wetland, and should be moved to an already disturbed area outside of the groundwater basin so as not to impact this wetland, Swamp Cedar ACEC.	Although the Swamp Cedar ACEC vegetation community is dependent on the existing hydrologic conditions, it is not considered a "wetland." Additionally, based on the Hydrology report <i>Results of Preliminary Hydrogeologic Review (Draft), Proposed Spring Valley Wind Farm</i> (Kleinfelder 2010) and as described in Sections 4.5.2.2.1 and 4.11.2.2.1 of the Preliminary EA, the project area is in a groundwater discharge area of Spring Valley and the proposed action would not result in changes to the existing hydrology that supports the vegetation present in the ACEC. As stated in the Section 3.5.2 of the EA, the distance to ground water is between 14.5 and 40.5 feet. Turbine footings would be approximately 8 feet deep and therefore would not breach the perched groundwater layer. A resource conservation measure has been added to Section 2.1.4.2 that states, "If the water perching layer is breached, the hole or foundation will be seal grouted to preserve the subsurface hydrology that feeds the local system."
3	34	ACEC	1	8	3.11.2 Special Designations: The ACEC should be as large as necessary to protect the resources (BLM 1988), this statement made, the BLM has not visited the Tribes to determine the size of the Swamp Cedar ACEC. When the Tribes put forth their recommendation to the size-the BLM should make every effort to modify the ACEC.	The BLM and the Tribes have recently met in the Swamp Cedar Area of Critical Environmental Concerns (ACEC) to discuss the proposed Traditional Cultural Property (TCP) that encompasses the Swamp Cedar ACEC. ACEC and TCP are two separate and independent designations for special areas. ACECs are designated by the BLM through the Land Use Planning Process. The Swamp Cedar ACEC was analyzed in the Ely RMP FEIS and designated by the Ely RMP Record of Decision (ROD) in 2007. The Tribes were cooperators with the BLM on the RMP/FEIS and ROD. TCPs are proposed by the Tribes and based on cultural significance. The proposed TCP is larger than the ACEC based on the boundaries requested by the Tribes. The Schell Field Office is seriously considering adjusting the ACEC boundaries on Public Land to match the proposed TCP boundaries on Public Land after the TCP has been finalized. This process will require changes to the RMP. Proposed TCPs are protected under Archaeological Resources Protection Act of 1979 as amended.
16	14	AQ	2	9	Scientific studies have revealed that desert ecosystems and minerals have the ability to store CO2 gases. Have Desert Researchers Discovered a Hidden Loop in the Carbon Cycle? How much CO2 storage capability would be replaced by development? If the goal is indeed to reduce greenhouse gases, is it wise to remove this much carbon storing living crust? Please provide a detailed analysis on the amount of GHG that would otherwise be offset by an intact arid ecosystem.	Under both alternatives, no more than 337 acres would be disturbed in the short term, and no more than 111 acres would be disturbed in the long term. 111 acres is a negligible amount of vegetation and soil crust relative to the entire 581,213 acre Spring Valley Watershed (0.02%). There is no current data to support that the loss of such a small amount of soil crust relative to available crust would create a measurable change in CO2 volumes in the atmosphere. The Final EA has been revised to include an analysis of the impacts to air quality and a disclosure of pollutants and greenhouse gas emissions.
15	14	AQ	59	9	The BLM fails to identify any direct evidence that the proposed project will offset greenhouse gas emissions and even admits the uncertainty. There is no analysis on the volume of greenhouse gas emissions that would occur from the thousands of vehicles required for the construction of this project. There is no analysis on how the removal of carbon storing soil crusts would add to CO2 volumes in the atmosphere. From the lack of information in BLM's analysis, we are actually worried that the proposed project will make an even more problematic situation concerning climate change.	The purpose and need for the project is not to offset greenhouse gas emissions. An analysis of air quality and greenhouse gas emissions has been included in the Final EA. There is no current data to support that the loss of such a small amount of soil crust relative to available crust would create a measurable change in CO2 volumes in the atmosphere.
17	14	AQ	59	9	A final EIS will need to provide a quantitative analysis of the proposed project's potential to offset greenhouse gases. This project is being advertised as "green energy", yet there is no proof that it will actually offset greenhouse gas emissions. From the amount of destruction that would occur to the natural ecosystem as well as the impacts to the local community, the BLM has failed to prove that this project can even accomplish what it has set out to do.	The purpose and need for the project is not to offset greenhouse gas emissions and the Preliminary EA does not present the proposed project as a "green energy" project, but as a renewable energy generation option. The Final EA has been revised to include an analysis of the impacts to air quality and greenhouse gas emissions.
5	20	AQ	2	9	Undertake a cradle-to-grave analysis of net GHG emissions from the manufacturing (think concrete and steel-the highest emitters of all), international transportation of parts, construction emissions, lost CO2 sequestration and very low offsets by this Industrial power project (offsets of natural gas, not coal, since Big Wind is intermittent), and you will find net increases in GHGs, not reductions. So, your entire "basis" for pushing these boondoggles down our throats doesn't even exist-it is a big greenwashed fraud.	Under both alternatives, no more than 337 acres would be disturbed in the short term, and no more than 111 acres would be disturbed in the long term. 111 acres is a negligible amount of vegetation and soil crust relative to the entire 581,213-acre Spring Valley Watershed (0.02%). There are no current data to support that the loss of such a small amount of soil crust relative to available crust would create a measurable change in CO2 volumes in the atmosphere. The Final EA has been revised to include an analysis of the impacts to air quality and a disclosure of pollutants and greenhouse gas emissions.
1	24	AQ	2	6	I did not get a photo of the worst of the blowing dust in Spring Valley. Disturbance from 28 miles of access roads will greatly exacerbate these effects.	Section 2.1.2.2 of the Preliminary EA states that "In addition to grading, the application of new gravel may be necessary to maintain road surfaces. Water would be used as needed for dust control." A dust abatement plan will be put together as part of the COM final plan.

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9	26	AQ	2	6	How will severe dust storms affect wind and other apparatus? We recently observed a severe dust event in Spring Valley. How will all the disturbance from construction of the facility increase dust? How will dust be increased by SNWA de-watering, aquifer drawdown and killing of phreatophyte and other vegetation as planned by SNWA to prevent plants from having a drop of water, all the potential disturbance and unstable and eroding soils here, further loss of stabilizing vegetation as a result of all this and any other wind farm disturbances, buried pipelines, and a host of other disturbances?	Dust would not have an affect on wind turbine generators or associated facilities. Best Management Practices to address impacts, including surface disturbances, are part of the proposed action and alternative and are described in Section 2.1.4 of the Preliminary EA. BMPs include the following: "In construction areas where ground disturbance is unavoidable, surface restoration would consist of recontouring and reseeding with a BLM-approved seed mix." Additionally, as described in Section 4.5.2.2.1 of the Preliminary EA, the maximum total annual water use associated with the proposed action would only occur during the construction phase and would amount to 0.44% of the total annual groundwater discharge in Spring Valley. A dust abatement plan will be part of the final COM plan.
84	26	AQ	2	6	How will the dust storms interfere with VESPER? Why isn't the project just shut down from late afternoon until morning? This seems reasonable.	Dust would not have an affect on the VESPER radar system. The Avian and Bat Protection Plan for the Spring Valley Wind Energy Facility (Appendix F of the Preliminary EA) includes different phases of turbine curtailment and the potential for Wind Turbine Generator shutdowns of up to 37,500 turbine hours.
12	29	AQ	2	6	The EA inadequately analyzes the project's potential to remove soil crusts, thus causing erosion that will result in increased dust from blowing winds. How would this be mitigated?	Best Management Practices to address impacts are included for the proposed action and alternative and are described in Section 2.1.4 of the Preliminary EA including "In construction areas where ground disturbance is unavoidable, surface restoration would consist of recontouring and reseeding with a BLM-approved seed mix." In addition, a Restoration Plan is provided in Appendix A and a dust abatement plan will be part of the final COM plan. Interim seeding and final seeding would also help mitigate dust and erosion as described in the EA.
2	4	BR	19	6	This project has the potential to affect millions of bats.	The potential for the project to impact bats is disclosed in Sections 4.2.2.7, 4.2.3.7, 4.3.2.6, and 4.3.3.6. The ABPP has been prepared to mitigate the impacts described.
6	4	BR	20	7	It could kill bald eagles.	Bald eagles are an uncommon to rare occurrence in the project as described in Section 3.3.5. Impacts to the species are disclosed in Sections 4.3.2.5 and 4.3.3.5 using the best available data and currently accepted methods. Further, the ABPP (Appendix F) details comprehensive mitigation measure to reduce impacts to avian species.
5	4	BR	21	6	It would also fragment and destroy habitat for the sage grouse.	Sage grouse habitat in the area is considered relatively low-quality that is surrounded by roads, transmission lines, and other disturbances. The closest active lek is 2 miles from the project area and sage grouse have not been recorded in the project area. Data from SNWA has been included in the EA to support the lack of sage grouse activity in the project area. The potential for the project to impact sage grouse is disclosed in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently accepted methods.
4	4	BR	22	6	It would also fragment and destroy habitat for the pygmy rabbit.	The selected action would avoid all current occupied and high-quality pygmy rabbit habitat. The impacts to pygmy rabbit are discussed in Sections 4.3.2.1 and 4.3.3.1 using the best available data and currently acceptable methods.
11	10	BR	19	10	The EA discloses the presence of hundreds of thousands of Mexican free-tail Bats which reside seasonally at the Rose Guano Cave in the South Spring Mountains, less than 4 miles from the proposed project site, and other bats, many of which are on watch lists as sensitive species, including over one million bats migrating through Spring Valley, seasonally. The BLM appears to make the decision in the EA and the Record of Decision not to avoid project impacts to either the resident or the migratory population of bats, but to instead rely on monitoring and mitigation for addressing future adverse impacts, i.e. mortality from collisions with turbines, in up to five phases through an "adaptive management" process. The EA, however, did not propose an alternative to siting the proposed project farther away from Rose Guano Cave or in areas which would avoid migratory routes for the bats.	The decision record has not been issued at this time. The BLM's selected alternative (the alternate development alternative) was designed to avoid high use areas such as water sources. The project was also moved south and west from its original location, farther from Rose Guano Cave. Other locations described in Sections 2.5.1 and 2.5.2 were considered and eliminated from detailed analysis. Mitigation is an acceptable method for addressing all remaining impacts. The current positioning of the project area was a consideration of where wind resources are tempered by the weight of other resource issues.
12	10	BR	19	10	A full EIS should more thoroughly analyze the impacts of the project on resident and migratory bats and provide alternatives which avoid as many impacts as possible to these Spring Valley wildlife resources	This EA is tiered to the BLM's Programmatic EIS for Wind Development and it both summarizes the impacts described in the Programmatic EIS as well as site-specific impacts as determined through two years of pre-construction surveys and Dr. Sherwin's radar and telemetry bat study and coordination with agencies and experts. The EA considers the proposed action, an action alternative, and the no action alternative in detail as well as two alternatives that were eliminated from detailed analysis which is within CEQ and BLM requirements for EAs.
6	10	BR	21	6	How were NDOW concerns with impacts on Sage Grouse addressed in the EA?	Sage grouse issues identified by NDOW in the initial Draft EA were addressed in Sections 3.3.4, 4.3.2.4, and 4.3.3.4. NDOW did not submit any comments or concerns specific to sage grouse for the most recent EA dated July 19, 2010.
5	10	BR	21	9	Because Greater Sage Grouse are imperiled in the sagebrush steppe, including Spring Valley, we are concerned that the environmental assessment of impacts and whatever EA requirements on proposed sage grouse management and mitigation (we were unable to find them), are inadequate to meet federal and state protection mandates and policies. Many efforts at the federal, state, and local levels to conserve Sage Grouse and its habitat in Nevada are underway, but the EA appears to dismiss both the concerns and the "solutions."	Section 2.1.4.3 provides resource conservation measures, including measures for sage-grouse. Additionally, Table 6.1-1 Section 5.9 Ecological Resources – Gallinaceous Birds (BLM 2005: 5-73 to 5-74) provides mitigation measures from the PEIS. In addition, as part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.

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10	10	BR	21	9	A full EIS should do much more thorough work in analyzing potential impacts of the proposed project to Greater Sage Grouse and their habitats in Spring Valley and develop alternatives which avoid the most serious impacts, including moving the project site, and adequate mitigation for unavoidable adverse impacts.	The EA provides a detailed analysis of impacts to sage grouse and includes an alternative (the BLM's selected alternative) that moves turbines farther from leks, where the most serious impacts could occur. The area provides low-quality sage grouse habitat and birds were not observed in the area during general use bird surveys. Additional analysis using survey data provided by SNWA has also been added. Lastly, as part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
3	10	BR	21	9	We searched for information on the Greater Sage Grouse, a candidate species which the USFWS just ruled is fully warranted for listing under the Endangered Species Act, but precluded currently. Very little information is in the EA or the PEIS excerpts in the EA. Serious concerns were raised by the Nevada Department of Wildlife and others about potential impacts on Spring Valley Sage Grouse populations and their habitat in the scoping phase. The EA does not have a section in which the BLM responds to public concerns such as these, but an EIS would do this.	Gallinaceous Birds, Section 3.3.4 of the EA describes the affected environmental for greater sage-grouse. Additional information regarding local movement patterns based on SNWA-provided telemetry data has been added to this section. Detailed impacts to this species are described in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently accepted methods. NDOW did not submit any comments or concerns specific to sage grouse for the most recent EA dated July 19, 2010.
7	10	BR	21	10	How did the BLM comply with the June 30, 2004, greater Sage Grouse Conservation Plan for Nevada (http://www.ndow.org/wild/conservation/sg/plan/SGPlan063004.pdf) developed by the Nevada Governor's Sage Grouse Conservation Team, in which the BLM participates?	The Greater Sage Grouse Conservation Plan was utilized for development of the analysis and mitigation; however, it is not a regulatory document requiring specific compliance actions. The BLM analyzed impacts to greater sage-grouse and determined the appropriate measures to address those impacts, as described in the EA.
9	10	BR	21	10	How did BLM comply with IM# 2010-071 (http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2010/im2009-071.html) regarding Sage Grouse management considerations for energy development proposals on public lands?	That IM states, "Screen new right-of-way applications to identify whether the wind or solar energy development or site testing and project area includes priority habitat. If so, alert the applicant as early as possible that the application may be denied or that terms and conditions may be imposed on the right-of-way grant to protect priority habitat as supported by NEPA analysis." This project was applied for prior to the IM being issued so it is not considered a new ROW application. However, the project was reviewed early in the process and the area contains low-quality habitat and is not priority habitat.
8	10	BR	21	10	How did the BLM follow the Energy and Infrastructure Development Standards to Conserve Greater Sage-grouse Populations and their Habitats also developed by the SG Conservation team to provide guidelines when proposed energy development impact Sage Grouse and its habitats as this one does in Spring Valley?	The project is proposed in an area of low-quality sage grouse habitat and turbines have been proposed at least 2 miles from known active leks.
30	14	BR	19	6	The Draft Avian and Bat Mitigation and Adaptive Management Plan states: "During this study, turbine cut-in speeds will be altered from sunset to 4 hours after sunset for a 62-day period (248 hours) during the highest use period of August 1 through September 31." There are 12 other species of bats that could potentially be impacted by this project from May to the beginning of August. An adaptive management plan should be created for the additional species at risk as well.	The cut-in speed study from August 1 to September 30 is a starting point for mitigation correlating with the highest use period documented in pre-construction bat and radar surveys. The ABPP provides for additional cut-in speed changes and shut-downs at any time of the year in a phased approach to address impacts to both bats and birds.
31	14	BR	19	6	We have interviewed two biologists who have participated in mortality surveys for wind energy project. It is extremely difficult to train people to find carcasses of dead bats due to the size of the animal and the camouflage color of the animals. Most biologists tend to feel that this kind of monitoring is not effective.	Mortality surveys can be difficult, depending on many factors. Searcher efficiency trials will be performed for each searcher during each season and mortality numbers will be adjusted using current scientific methods and statistics. Numbers will also be adjusted based on scavenger studies.
27	14	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan in no way convinces us that bat mortality can be avoided. It is frivolous for the BLM to consider approving a Right of Way for a project that is so close to the Rose Guano Cave .	The Avian and Bat Protection Plan was developed to address the potential issues to both birds and bats. Professionals/experts in wind/wildlife interactions, such as Dr. Thomas Kunz, an internationally renowned bat researcher, and local agencies were involved to ensure that all necessary measures were utilized and were realistic.
26	14	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan fails to document four species that would occur in the region. These species are: California myotis (<i>Myotis californicus</i>), Fringed myotis (<i>Myotis thysanodes</i>), Western Pipistrell (<i>Pipistrellus hesperus</i>), and Hoary Bat (<i>Lasiurus cinereus</i>). The hoary bat is mentioned in the EA, but the EA neglects to mention that the Hoary bat is a BLM Species of Concern. An EIS will need to provide a complete list of bat species that would occur in the area. In April, 2010, BLM employees informed us that this new mitigation and adaptive management plan "would resolve issues associated with bats." We believe this was a premature statement.	The plan lists bats identified during two years of acoustic and capture surveys in the project area. Hoary bat is included in plan. Hoary bat is not a BLM species of concern. The Avian and Bat Protection Plan was developed to address the potential issues to both birds and bats. Professionals/experts in wind/wildlife interactions, such as Dr. Thomas Kunz, and local agencies were involved to ensure that all necessary measures were utilized and were realistic.

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29	14	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan states: "A curtailment study will be completed during the first year to determine the most effective cut-in speed following methods based on those developed by Arnett et al (2009) in which they evaluated the effectiveness of increasing cut-in speeds from an initial 4.0 m per second (m/s) to experimental speeds of 5.0 and 6.5 m/s. These increased cut-in speeds were effective in reducing bat mortality by 53%-87%, with minimal loss of revenue for the WEF (Arnett et al. 2009). No Brazilian free-tailed bats were evaluated in this study; therefore, testing is needed to determine the effectiveness of increased cut-in speed." Because "No Brazilian free-tailed bats were evaluated in the study", you have very little information as to what the future outcome will be.	Given that cut-in speed changes have been successful for other bat species, it is highly likely they will be effective for this species as well. However, the ABPP is an adaptive management plan in which increasing cut-in speeds is just one tool that may be used. The plan was written to evaluate impacts and provide tools and techniques to address those impacts as they occur.
32	14	BR	19	10	The EA states: "The project proponent will provide \$10,000 per year for three years to fund wind/wildlife interaction studies. Research will be recommended by the TAC, approved by the BLM Authorized Officer, and funded by the proponent. Additionally, the BLM or other participating agency may elect to contribute funding. In that event, the proponent would provide funding to the BLM, and the BLM would issue a Request for Proposals for the study." A \$30,000 research fund will not bring back the Rose Guano Cave population of Mexican free-tailed bats if the wind farm causes a giant population crash. This is not an acceptable mitigation plan.	The \$10,000 per year is intended to add to research to help provide a net overall benefit. However, it is not intended to mitigate all impacts to bats or birds. There are many initial mitigation measures as well as adaptive measures that have been developed and described in the ABPP to ensure mortality levels stay below significant levels.
24	14	BR	19	10	The project is approximately 4 miles from Rose Guano Bat Cave. The Programmatic EIS for wind states that caves used by bats should be avoided. In place of this measure, a project-specific Mitigation Measure has been provided in Section 6.4.2 and in the ABPP. The mitigation measure, to avoid known bat caves and migration corridors, is completely being ignored. There appears to be no mitigation.	The project is proposed 4 miles from Rose Guano Bat Cave and was not placed along the ridgelines closer to the cave. The referenced measure to avoid bat caves and migratory areas is disclosed in the EA and it is addressed by presenting a comprehensive bat protection plan (Appendix F) to address the proximity to the cave and migration area.
37	14	BR	20	10	Bald and Golden Eagles are common on the project site. Spring Valley is known as a wintering region for bald eagles. How will death of bald eagles be waived under the Bald and Golden Eagle Protection Act? A Section 7 take based on research could not be justified in this case. How many Take permits would be issued for bald eagles? Additionally, the presence of WTGs would increase the risk of nest abandonment in and near the project area. How is this being allowed under the Bald and Golden Eagle Protection Act?	Based on two years of pre-construction data and as disclosed in Section 3.3.5 of the EA, golden eagles were only observed 13 times and bald eagles were only observed once during surveys, with several other incidental observations outside of survey periods. No bald or golden eagle nests or nesting habitat has been recorded within or adjacent to the project area. If avian mortality occurs, enforcement of the MBTA and the Eagle Act are the responsibility of the USFWS. No permits for take of eagles are currently proposed. The ABPP outlines measures to reduce risk to avian species. Additionally, IM No. NV-2010-063, Guidance for the Development of Project-specific Avian and Bat Protection Plans for Renewable Energy Facilities, precludes the issuance of a Notice to Proceed until the USFWS's letter of concurrence for the ABPP is received for the project.
38	14	BR	20	10	As of January 2008 San Geronio wind farm near Palm Springs, California consists of 3,218 turbines. Raptors and water birds are killed here, but a study by McCrary (1986) evidenced that passerines were also being killed in numbers: "an overall estimate of as many as 6,800 birds killed per year, most of them nocturnal passerine migrants." www.iberica2000.org/documents/EOLICA/6800_bird_fatalities.doc .	The San Geronio Wind Farm is an old facility using old technology and closely spaced turbines, with 3,218 turbines providing 615 MW. Spring Valley would contain 75 turbines generating 149 MW; more than 10 times fewer turbines to generate similar power production. It also occurs in a very different area ecologically. Therefore, these facilities cannot be accurately compared. Potential impacts to all birds, including passerines, are described in the EA in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 using the best available data and currently accepted methods.
36	14	BR	20	10	It is our view that approval of this project would be a violation Executive Order 13186, the Migratory Bird Treaty Act. We do not believe that the BLM nor the applicant has proven that their project will not remove a substantial amount of avian wildlife from the region. Large raptors are the birds that suffer the highest mortality. Please review the following references: Please review the following video documenting a fatal collision with a large raptor and a wind turbine: http://www.wind-watch.org/video-vulture.php . The following article details the concerns of avian mortality from wind energy: http://seattletimes.nwsourc.com/html/localnews/2012048835_windbirds07m.html .	The MBTA does not allow take of migratory birds. Approval and construction of the project is not in violation of that act. If avian mortality occurs, enforcement of the MBTA is the responsibility of the USFWS. Large birds actually make up a small percentage of the overall avian mortality across all wind farms, with several projects contributing an disproportionate amount of the raptor fatalities. In this case, a comprehensive ABPP (Appendix F) has been prepared to address potential mortality.
28	14	BR	20	10	It is frivolous for the BLM to consider approving a Right of Way for a project that is in a region that has such a robust population of different species of raptors.	The studies, impacts analysis, and development of mitigation required before the BLM can approve a right-of-way have been completed and are disclosed in the EA.
40	14	BR	21	6	The project will disturb sage grouse habitat. Sage grouse need large undisturbed areas of sagebrush, not cut by roads or fences, to nest and feed in. The impacts of industrial wind farms in sage grouse habitat will involve further fragmentation of the large patches of pristine sagebrush that harbor these birds. There is about 3,643 acres of sage grouse habitat within the project site. The major threat to Greater Sage-Grouse is the continued degradation of sagebrush habitats across the West. Agriculture has completely eliminated millions of hectares of native shrub-steppe habitat dominated by sagebrush, while additional millions of hectares of shrub-steppe have been stripped of their sagebrush vegetation. Overgrazing and urban development also contribute to the degradation of shrub-steppe habitat.	As described in the EA, the habitat in this area is of low quality and is already severely disturbed and surrounded by transmission lines and roads. The impact of removal of this habitat is fully described in the EA and appropriate mitigation is included in Chapter 6. Compensatory mitigation has been included in Section 6.4.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
41	14	BR	21	9	From the Programmatic Wind EIS: "Avoid, when possible, siting energy developments in breeding habitats. Potential breeding habitat occurs in the project area at low frequencies; however, the project is 2 miles from the closest lek and individuals likely use habitat west of SR 893 and the nearby overhead transmission line, thereby avoiding physical barriers. This is not mitigation, nor avoidance. Off-site mitigation should be considered, such as retiring a grazing allotment in Sage grouse habitat. Fragmentation will greatly increase, and is not mitigated." This has not been followed.	As part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
42	14	BR	22	6	Biologists mapped two burrows of pygmy rabbit (<i>Brachylagus idahoensis</i>) in the northern part (SWCA 2009). These small herbivores require tall dense sagebrush stands to hide from predatory hawks and eagles. At least 3 individuals were seen in 3 separate habitat patches in the project site. About 89 acres of good habitat for this rabbit, and 61 acres of occupied habitat with active burrows were found on the project area. The EA states that it hoped that the Pygmy rabbits will move away, "to avoid mortality associated with daily operations such as crushing by vehicles" Because pygmy rabbits are restricted to sagebrush habitats with deep soils, they have always been rare and patchily distributed across their range. Biologists agree that the main threats to pygmy rabbits across their range are habitats loss and fragmentation caused by conversion of sagebrush rangeland to agriculture, development, including oil and gas production, and wildlife frequency in some areas. If the Proposed Action is selected, relocation of pygmy rabbits by live trapping prior to construction should be considered in consultation with the USFWS and NDOW to avoid direct mortality. This is unacceptable, as the public does not have a chance to review any Pygmy rabbit relocation plan after project approval. How does trapping impact the rabbit? Please reference past trapping studies and give mortality numbers. How will rabbits be prevented from	That mitigation measure is included in Section 6.4.
43	14	BR	23	6	The wind farm we believe will result in impacts to resident elk, deer, and pronghorn antelope, by noise impacts, habitat fragmentation, and increased human presence. The project will disrupt connectivity for wintering elk and pronghorn antelope. Turbines would be bisected by roads, concrete, electric cables, and other disturbances. Wildlife in general would be blocked by the proposed project.	The project area will not be blocked off and wildlife in general will be allowed to move freely through the project area. All impacts to big game, including the mentioned species, are described in Sections 4.2.2.3 and 4.2.3.3 using the best available data and currently accepted methods.
44	14	BR	24	10	No surveys for rare plants were undertaken on the site, only a few casual observations. Parish's phacelia (<i>Phacelia parishii</i>) has the potential to be found on the site, as records of it are found 250 feet from the project boundary. It is found on clay and alkaline soils by the plays and springs. Shadecale spring parsley (<i>Cymopterus basalticus</i>) is state ranked as "critically imperiled" Broad-pod freckled milkvetch (<i>Astragalus lentiginosus v. latus</i>) is state ranked as "imperiled due to rarity or other demonstrable factors."	Data from NNHP shows Parish phacelia over 4 miles from the current project area. Mitigation for this species, which includes pre-construction surveys, is included in Section 6.4. Two populations of <i>Astragalus lentiginosus v. latus</i> occur approximately 2.5 and 7.0 miles from the project area; however, this species does not have habitat within the project area.
4	14	BR	25	6	The EA is suggesting that the overall footprint of the project would be less than significant because of the figure of "448 acres of disturbance". This statement is misleading from an ecological perspective. New roads, electric lines, substations, underground electrical collection systems, etc. will all be obstructions to wildlife habitat and connectivity in this region.	The quantification of disturbance relative to available habitat is only one component of the analysis. The EA describes the impacts of new roads, electric lines, substations, etc. for all resources under their respective sections in Chapter 4, both from a direct loss of habitat, as well as indirect impacts.
8	14	BR	26	6	An EIS should also examine the impacts geo-testing would have on soils and burrowing animals. How many decibels? Would burrowing animals be deafened?	The BLM's Wind PEIS that this EA is tiered to analyzes those issues. Geo-testing is part of the proposed action and is therefore considered in the analysis for the EA. This EA considers burrowing animals and the impacts from noise in Sections 4.2.2.1, 4.2.2.2, 4.2.3.1, and 4.2.3.2 using best available data and currently acceptable methods.
25	14	BR	29	10	The Avian and Bat Mitigation and Adaptive Management Plan is only in Draft Form. Where is the final document? The several unresolved issues in the document indicate that BLM is negligent in completing these studies.	The final ABPP is included in this final EA. All required studies have been completed.
35	14	BR	29	10	All of the mitigation phases are "after the fact". You have not convinced us that any of these mitigation phases will be adequate enough to prevent the mortality.	There are both pre-construction and post-construction measures listed in Chapters 2 and 6 of the EA and the ABPP. Measures included are based on current methods with data that support their success. For example, cut-in speed changes have been shown to reduce mortality between 53% and 87%.
39	14	BR	29	10	The avian and bat mitigation plan does not address the mortality that will probably happen, and defers mitigation to future studies. This is unacceptable. The Spring Valley Wind Project EA is not following the recommendations of the PEIS.	The ABPP directly addresses mortality by measuring what occurs and implementing the appropriate mitigation. It also includes initial mitigation, including cut-in speed changes which have been proven to reduce mortality between 53% and 87%.
33	14	BR	30	6	The EA states: "Carcass removal trials will be completed seasonally as described above in Section 6.2. Different seasonal rates for carcass removal are necessary to address changes in the scavenging throughout the season, as well as over time, as scavengers adapt to a novel food source. Carcasses will be placed as described for searcher efficiency trials. Carcasses will be checked at 1, 2, 3, 4, 5, 6, 7, 14, 21, and 28 days following placement, or until they are all removed. Separate carcass removal rates will be determined for bats, small birds (passerines), and large birds (raptors). Carcasses used for removal trials will be handled with disposable nitrile gloves or an inverted plastic bag to avoid leaving a scent on the carcasses and interfering with the scavenger removal trial (Arnett et al. 2009)." This still is in the trial phase. More studies should be conducted before the project is constructed, not after. This data should be included in an EIS.	These trials are a necessary part of post-construction monitoring described in the ABPP in order to estimate the actual mortality occurring, not to predict potential mortality. Data from carcass removal trials are not necessary to support additional analysis in the EA.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
34	14	BR	30	6	The Mortality Threshold fails to explain the reasons that the numbers listed are acceptable thresholds for mortality of species. A final EIS will need to justify these numbers from an ecological perspective.	Section 7.3 of the ABPP provides the explanation for species-specific mortality thresholds: "To determine species specific mortality thresholds, the relative abundance of that species has been determined using preconstruction survey data. That number is then used as a percentage of the overall mortality thresholds to determine the species indicator. The indicator is then multiplied by a species status factor to determine the species specific mortality threshold. The ABPP goes on to state that these numbers may be changed based on post construction monitoring data."
1	15	BR	29	6	I wish to make the following mitigation suggestions: 1) If constructed, create a summer monitoring of bat deaths and near impacts. 2) Make it a condition of the Operation License, that excessive bat deaths will require restriction to the summer operations of the worst wind turbine to reduce the impact. If a problem develops, Wind Turbines should not be operated from 30 minutes before sunset to an appropriate morning hour when the bats have returned to the Rose Cave.	Mitigation measures such as this are detailed in the ABPP (Appendix F) which is part of the selected action.
35	16	BR	19	6	The PEIS provided discussion and guidance regarding impacts to bats and ways to avoid, minimize and mitigate them. It states that migrating bats, such as the Mexican free-tailed bat, are at most risk of turbine collision, and that, "with proper design and siting of wind projects (e.g., turbine management and design and land management), bat mortality can be greatly reduced and population-level effects avoided." It also recommends as part of this approach that, "turbines should not be located near known bat hibernation, breeding, and maternity/nursing colonies, in migration corridors, or in flight paths between colonies and feeding areas. The design criteria and mitigation measures in the EA seemingly ignore this advise. The Avian and Bat Protection Plan in Appendix F proposes to avoid bat mortality through the use of high-tech radars and their real time connection to computers controlling wind turbine operations. Mortality surveys would be conducted the first three years of operation and every fifth year after that. Based on the average mortality of all turbines, or an absolute figure for any individual turbine, various reactive measures would be taken, including diurnal or seasonal changes to turbine operation, or outright shut downs of varying lengths in worst-case situations. While these measures are an improvement over what was proposed in the last EA, their effectiveness is still speculative, and should be implemented with caution and intense	The monitoring program developed for this project meets the needs to develop the necessary scientific data for the TAC and BLM to make necessary management decisions. Additionally, the ABPP has been written to be adaptive to the data collected to ensure that monitoring and associated mitigation are effective over the long term. A 24/7 operations center will carefully monitor the data collected from the radar and adapt as required to reduce impacts to birds and bats.
14	16	BR	19	6	A large and significant migratory roosting cave, that shelters over a million Brazilian free-tailed bats lies immediately adjacent to the project area and is another significant and unique feature.	Rose Guano Bat Cave is addressed in the EA in Sections 3.11.2, 4.11.2.2, and 4.11.3.2, as well as in the bat sections of the EA and the ABPP which outlines extensive mitigation measures to reduce impacts to bats.
34	16	BR	19	10	Based on figure 3 in the SWCA report, turbine locations Alt 8, 9, and 10, and 58, 59, 73, and 74 are located near water or places having an elevated level of bat activity as measured by monitoring stations CF-2076 and CF-2079. While the BLM selected alternative does provide for placing turbines at least 1/2 mile from open water, no rationale or science is provided to support that this degree of separation is adequate for limiting and mitigating bat mortality, despite making the statement that, "Bat activity was generally much greater in survey locations near sources of water".	The 1/2 mile buffer is a common buffer distance used by wildlife and land management agencies to avoid impacts. For example, the Colorado Division of Wildlife has issued a list of avoidance buffer distances for raptor nests that range from 0.25 to 0.05 mile (CDOW 2008). Further, different buffer sizes are applied varying on the type of impacts and the wildlife species involved. The 1/2 mile tower placement buffer from open water was considered appropriate for bats.
36	16	BR	19	10	In light of the presence of the Rose Guano cave and the magnitude of the risk identified through preconstruction surveys, it is incumbent on the BLM to further analyze and disclose the impacts to bat species and to re-evaluate project siting and design. It is unclear what role, if any, NDOW has played in the above. NDOW should be consulted and its recommendations must receive the utmost consideration as part of an EIS process.	The EA provides detailed, site-specific analysis as well as a summary of the impacts disclosed in the Programmatic EIS for Wind Energy Development. This project has been intensively evaluated for siting and environmental impacts for several years, including close coordination with NDOW, USFWS, and other professionals/experts such as Dr. Thomas Kunz, Dr. Michael O'Farrell, and Dr. Steven Carothers.
29	16	BR	21	6	Another study on impacts to sage grouse from coal-bed natural gas development in Montana and Wyoming concluded that any development within .25 miles of a lek posed a severe threat to the lek's persistence, and may result in impacts over much larger areas. It further found that timing restrictions on construction and drilling during the breeding season do not prevent the impacts of associated infrastructure, such as avoidance, collisions, and predation during other times of the year that may be crucial for population persistence. Based on modeling conducted in this study, the authors estimated that development within 2 miles of a lek would reduce the average probability of lek persistence from 87% to 5%.	The BLM's selected alternative includes a 2-mile lek avoidance buffer.
27	16	BR	21	6	The PEIS is cited in this EA as stating that impacts from a wind project such as this proposal would include increased predation and interference with behavioral activities such as foraging, nesting and lek activities. The EA then states that the suggested management practices for protecting the sage grouse would be implemented along with mitigation measures found in Section 2.1.4 and Chapter 6 of the EA. However, when the proposed "design criteria" are compared to the best management practices of the PEIS, the proposal falls far short of providing the needed protections for the grouse called for in the PEIS and FWS guidelines.	The BMPs from the PEIS are described in Table 6.1-1 and are included as measures in this EA.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
18	16	BR	21	7	The Center is in receipt of two letters from the NDOW to the Nevada BLM expressing strong concerns that their recommendations for the wording of Management Action SS-40 were ignored or disregarded in the final wording. In a June 24 letter, NDOW stated that as written, SS-40, "will not adequately protect sage-grouse habitat to the extent necessary to maintain sage-grouse distribution and abundance"; this letter went on to question the BLM's compliance with its internal direction and policies concerning sensitive species. In a follow-up letter, NDOW stated that they are, "disheartened by Ms. Thomas's letter of response which quickly dismisses scientific study in favor of the decisional flexibility for your agency". This same letter reiterated, "There is a strong need to provide protection for dwindling populations of sage-grouse. It is our opinion that the 1/4 mile buffer zone (that may protect the lek site but not nesting, brood-rearing or winter habitat) which the Ely District is employing is inadequate to provide ample protection from energy facilities, transmission lines or mines that would degrade available habitat.	This comment is in regard to the BLM's Approved Resource Management Plan and letters received on that document and is out of scope for this project and associated EA.
22	16	BR	21	9	Sage grouse, as the name implies, is closely allied and dependent on various stages of sage brush development for their life stages and survival. Grouse are found in different stages of sagebrush development depending upon the season and the needs of the grouse during that time. Despite the well-known importance of this habitat to sage grouse and for at least 50 years and the welfare of the grouse mirrors this trend. The proposal would destroy or degrade about 3,643 acres of habitat. Further, additional off-site impacts could reduce sage grouse use on approximately 38,289 acres due to behavioral interferences.	These impacts are disclosed in the EA and mitigations are included to address impacts as necessary. Additionally, as part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
23	16	BR	21	9	The proposed action alternative produces impacts within 4 miles of at least 4 leks - Cleve Creek, Bastian Creek, Osceola, and Big Negro Creek, South, all within the distance required by the grouse to complete its yearly cycle of activities. Impacts to sage grouse related to energy development and transmission include lek abandonment, reduce nesting area fidelity and reproductive success, and abandonment of previously used winter habitat.	These impacts are disclosed in the EA and mitigations are included to address impacts as necessary. Additionally, as part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
33	16	BR	21	9	None of the action alternatives adequately avoid, minimize or mitigate the impacts to sage grouse, and before issuing a final decision, the BLM must correct these deficiencies.	The Alternative Development Alternative includes a 2-mile avoidance buffer for sage grouse leks and mitigation is described in Chapter 6. Additionally, as part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
28	16	BR	21	10	Connelly et al. recommended that for non-migratory grouse occupying habitats that are disturbed uniformly and are generally well distributed around the lek, that a 2 mile no disturbance area would be adequate based on the present science. For non-migratory grouse occupying not uniformly distributed sagebrush habitats, a 3.1 mile non-disturbance buffer is in order. They also made note that migratory birds can move further than 11 miles between leks and nesting habitat, and that breeding habitats within 11 miles of a lek should be identified and protected.	Current literature is inconsistent and inconclusive on the exact buffer for sage grouse and wind farms. However, a 2-mile buffer is the current buffer recommended by NDOW (Personal communication from Kenneth Mayer, NDOW, to Ron Wenker, BLM, on September 1, 2009) and is considered appropriate for this project.
12	16	BR	21	10	Although currently there are no species listed under the Endangered Species Act at least two species, the greater sage grouse was found to be "warranted but precluded" for protections under the ESA in March of this year. The sage grouse utilize the project area for courtship, breeding, and rearing of their young as well as for winter habitat.	Sage grouse are described in Section 3.3.4 and potential impacts are described in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently accepted methods.
30	16	BR	21	10	Draft recommendations on energy and infrastructure development from the Nevada Governor's Sage Grouse Conservation Team, dated July 2009, state that sage grouse habitat categories 1 and 2 (leks, brood rearing and winter habitats) are irreplaceable and critical to the long term persistence of the grouse and that no wind or geothermal development be developed, under any circumstances in these habitats. It further states that where habitat categories have not been determined, wind turbines or geothermal facilities should not be sited within 3 miles of the nearest lek; and that transmission lines should not be sited within 3 miles of the nearest active lek, and that ground level structures such as roads, should not be sited within .5 miles of the nearest lek site.	Current literature is inconsistent and inconclusive on the exact buffer for sage grouse and wind farms. However, a 2-mile buffer is the current buffer recommended by NDOW and is considered appropriate for this project.
24	16	BR	21	10	Since there is a lack of experiential and research data associated specifically for power lines and renewable energy developments and sage grouse, to gain a sense of the "best management practice", one must look to programmatic recommendations and the existing data for similar developments.	Analysis and recommendations from the Programmatic EIS for wind development and current literature were used to prepare the analysis section for sage grouse in the EA.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
43	16	BR	22	6	The proponent's study of the project area has found conclusive evidence that pygmy rabbits utilize this site. Up to 179 acres of potential habitat would be degraded or destroyed by the proposed action or selected alternative development alternative. Harm to the rabbit would include direct destruction, modification and fragmentation of its habitat, increased risk to predation due to reduction and fragmentation of cover, and increase mortality from vehicle traffic.	Those impacts as well as others are described in the EA in Sections 4.3.2.1 and 4.3.3.1 using the best available data and currently accepted methods.
13	16	BR	22	6	The pygmy rabbit, is currently being review for inclusion under the ESA. Pygmy rabbits, extreme habitat specialists, occupy the site, making the area significant and important.	Potential impacts to pygmy rabbits are described in Sections 4.3.2.1 and 4.3.3.1 using the best available data, and currently accepted methods. Additionally, pygmy rabbit surveys were conducted within the project area following accepted NDOW protocols.
44	16	BR	22	10	With respect to impacts on pygmy rabbits, the EA states, "even with restoration activities, the loss of occupied and high-quality habitat and potential habitat could lead to local population decreases because pygmy rabbits require specific habitat characteristics that limit available areas to colonize. Regional population levels are not expected to be affected because of the small amount of habitat loss relative to the Spring Valley watershed." The BLM, through its selection of the "alternate development alternative" did avoid the destruction of known occupied and some of the high quality rabbit habitat. However, the Center still requests that the BLM step back from this EA and as part of a more inclusive EIS process, engage state biologists and pygmy rabbit experts in analyzing and disclosing the true impacts and their magnitude on the rabbit, and further, to identify the appropriate measures that would avoid, minimize or mitigate these impacts.	There has been extensive coordination with the USFWS and NDOW for this project and their concerns regarding this species have been addressed. The analysis and mitigation presented in the EA are based on input from those agencies as well as the public and BLM biologists.
16	16	BR	23	10	The site borders crucial pronghorn antelope winter range, and big horn sheep inhabiting the mountain ranges immediately to the east and west of the project drop into the project site area during the winter.	A description of pronghorn in the area is provided in Section 3.2.3 and impacts to the species are described in Sections 4.2.2.3 and 4.2.3.3 using the best available data and currently accepted methods. Based on available data and known big horn habitat characteristics, the project area does not contain big horn habitat.
42	16	BR	24	6	With regards to special status plant species, the EA only addresses Parish phacelia, finding that it was not observed within the project area but is found nearby. There are two other species, that while not BLM special status species, are none-the-less rare and imperiled and recognized by the natural heritage program as being so. Shadecale spring parsley (<i>Cymopterus basalticus</i>) is state ranked as "critically imperiled and especially vulnerable to extinction or extirpation due to extreme rarity, imminent threats, or other factors." Broad-pod freckled milkvetch (<i>Astragalus lentiginosus v. latus</i>) is state ranked as "imperiled due to rarity or other demonstrable factors". According to heritage records and mapping both plants are adjacent to or near the project area, and suitable habitat exists within the project area. Before approving this project, the BLM must conduct a survey to identify the presence or absence of these plants, and ensure that adverse impacts by the proposed wind project to these species are appropriately avoided, minimized or mitigated.	Habitat for <i>Astragalus lentiginosus v. latus</i> includes steep to moderate slopes, which do not occur in the project area. Similarly, habitat for <i>cymopterus basalticus</i> includes bare basaltic rocks and barren clays, which also do not occur in the project area.
15	16	BR	24	10	At least three plant species ranked by the Nevada Heritage program as critically imperiled due to extreme rarity or imminent threats are documented to have been found within two miles of the project site and have potential to be found within the site.	Based on available data, Parish phacelia is the only Nevada Heritage Program listed plant with potential habitat in the project area. Several other plants listed by the NNHP were recorded several miles away, but do not have habitat within the project area.
46	16	BR	28	6	The EA envisions a network of up to 27.8 miles of access roads, taking up 95 acres of currently undisturbed land, for the operation and maintenance of the proposed wind facility. Road disturbances may be up to 68 feet wide during the construction phase, and the EA states that they would be reduced to 28 feet wide, including ditches, after construction is completed. The Center has several concerns regarding this travel network. There is no discussion about how the temporary disturbance area will be reclaimed, including how invasive plants will be managed in sage grouse rearing habitat, and how raptor prey species will be discouraged from becoming established.	A habitat restoration plan is included in the EA in Appendix A which provides guidelines for reclaiming temporary disturbance and managing weeds. Raptor mitigation, including measure to discourage use, is included in the ABPP in Appendix F.
41	16	BR	29	6	The BLM must reinstate a scientifically and statistically based raptor study and utilize the results to redefine where the project is sited and how it is designed. The BLM also must add design and mitigation measures to reduce the presence of raptor prey species within the wind turbine field. The increased length of mortality monitoring suggested for bats will also benefit the management of raptor mortality.	A two-year study for birds, including raptors, following accepted protocols and recommendations from groups such as Hawk Watch International were used and the proposed action and alternative were developed based on findings. Design and mitigation measures for raptors are included in the ABPP.

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31	16	BR	29	6	Based on the cited literature and agency direction and other literature cited in them, it is apparent that the proposed mitigation measures for sage grouse in the EA are inadequate from both a spatial and temporal perspective, particularly given the magnitude of the risk that the sage grouse will be listed under the ESA. Particularly lacking is any attempt by the BLM or proponent to analyze and disclose the impacts of the project on the sage grouse from a landscape perspective. According to NDOW habitat maps, the entire project areas is in sage grouse wintering and rearing habitat and much is in nesting habitat. This immediately raises concerns given the above cited section of the PEIS and the FWS 2003 interim guidelines on wind and sage grouse. The analysis emphasis of distance from the single lek at Bastian Creek seems to have created a blind spot for the BLM in its analysis of project impacts on sage grouse. Also lacking was a discussion of how off-road vehicles would be restricted. Further, while the EA addresses invasive plant management, it envisioned the use of herbicides, which is counter to the guidelines in the PEIS.	The impacts to sage grouse from a landscape perspective are disclosed in the EA by describing the amount of available habitat and leks throughout the Spring Valley watershed and quantify impacts relative to that area. As an example, see Section 4.3.2.4.2 under Interference with Behavioral Activities. OHV use on BLM land is determined through the BLM RMP and is currently limited to designated roads and trails in Spring Valley.
26	16	BR	29	6	In 2005, the BLM issued a programmatic EIS for wind energy development in the west. This document contained a summarization of the best practices to protect Gallinaceous birds such as sage grouse during wind development planning and implementation. The measures, generic by nature included: control of invasive species; use of anti-perching raptor deterrents; restriction of OHV activity; avoidance of placing facilities in or next to sensitive habitats such as leks and wintering habitat; management of noise to prevent grouse disturbance; and, using a landscape approach to managing development impacts on sage grouse, such as identifying and avoiding daily and seasonal movement and migration routes, minimizing fragmentation and disturbance, restoration of habitat and compensatory habitat restoration for impacted sagebrush habitat.	These measures are listed and adopted as shown in Table 6.1-1.
37	16	BR	29	10	The Center offers the following suggestions: conduct a landscape analysis to properly site this development given bat, sage grouse and other species concerns. Wind energy efficiency should be compromised, if need be, to attend to species concerns; eliminate turbines near attractant feature, as determined by bat specialists and the peer-reviewed science; and, mortality surveys should be conducted annually for at least the first five years of operation.	A landscape analysis is not required as part of NEAP; however, an assessment of alternatives was completed and included in the EA. Avoidance of attractant features was determined by specialists and through available literature. The monitoring for this project is based around current protocols and has been developed through coordination with USFWS, NDOW, and other wildlife professionals/experts.
25	16	BR	29	10	In 2003, the FWS developed interim guidelines for avoiding and minimizing impacts to wildlife from wind turbines. In these guidelines, the FWS offer the following recommendations for locating "wind turbines and associated structures" within wind resource areas selected for development of wind energy facilities: Avoid fragmenting large, contiguous areas of habitat for area-sensitive species such as sage grouse; place developments on previously disturbed lands and away from areas of intact and healthy native habitats; avoid placing turbines within 5 miles of known leks; minimize roads, fences, and other infrastructure; avoid structures and designs that attract raptors; and, where feasible, place electric power lines underground.	These guidelines have been followed, as possible, and the USFWS has been coordinated with to address relevant issues. Many of these guidelines have been updated in more recent documents. For example, the current draft FAC guidelines that the USFWS are in the process of adopting do not recommend a set buffer from known leks. Further, these 2003 guidelines have been followed, as possible, and the USFWS has been coordinated with to address any issues.
32	16	BR	29	10	The Avian and Bat Protection Plan includes a monitoring plan with thresholds with regard to direct mortality of sage grouse from wind farm operations. It does not address in any way monitoring to detect indirect impacts to the grouse such as behavioral changes such as lek and winter range abandonment or reduced nesting and fledging success. A thorough protection plan that envisions utilizing an adaptive management approach must address these indirect effects as well as the effects of direct mortality.	Based on current data, impacts to sage grouse are expected to be minimal as described in the EA; therefore, monitoring is not required for the species beyond standard monitoring that NDOW does for grouse throughout the area.
39	16	BR	30	6	The PEIS offers recommendations for increasing the compatibility of wind development and raptor needs, and includes the following measures: Raptor use of the project area should be evaluated, and the project should be designed to minimize or mitigate the potential for raptor strikes. Scientifically rigorous raptor surveys should be conducted; the amount and extent of baseline data required should be determined on a project-specific basis; Turbine arrays should be configured to minimize avian mortality (e.g., orient rows of turbines parallel to known bird movements); Avoid the establishment of habitat that attracts high densities of prey animals used by raptors; and, Tubular supports rather than lattice supports should be used, with no external ladders and platforms. The EA see-ming in violates the first point, Since good survey data is lacking, it is unclear whether or not the second point is being followed, although through observation of maps showing the project and topographic orientation it appears to violate it. The implementation of measures in the third point to reduce prey populations are not addressed, while it does appear the fourth point is being implemented.	The Preliminary EA does not violate the first point. Raptor migration surveys were conducted for three days during each month of the two migration seasons over two years (9 days each season and 36 days total). Survey effort totaled over 200 hours of surveys for migrating raptors. In determining the intensity with which exploratory surveys such as these should be conducted, conversations with HawkWatch personnel resulted in the determination that a full long-term raptor migration site protocol was unnecessary to determine whether or not the project area falls within a major migratory corridor. In addition, the proposed action and alternative have been designed to reduce the amount of edge habitat that would attract higher densities of prey. Use of existing roads, and existing gravel sources was done when possible and the collection system and new access roads are located adjacent to one another to reduce the number of linear corridors needed. While turbine configuration was considered for environmental impacts, turbines also had to be configured to utilize the available wind resource to create a commercially viable project.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
38	16	BR	30	6	The proponent's contractor surveyed for raptors once a month (8 hours) in March, April and May for spring migration and September, October, and November for the fall migration, and each of three observation points were surveyed once during each period. The contractor attempts to given this abbreviated survey protocol a sense of legitimacy by saying that Hawkwatch International survey procedures and forms were used. HWI's survey procedures call for six days a week of observations over a period of weeks during the active migration period. No science is provided to justify the legitimacy or validity of surveying only once a month for eight hours, nor are there any estimates of the statistical precision or error given.	Raptor migration surveys were conducted for three days during each month of the two migration seasons over two years (9 days each season and 36 days total). Survey effort totaled over 200 hours of surveys for migrating raptors. In determining the intensity with which exploratory surveys such as these should be conducted, conversations with HawkWatch personnel resulted in the determination that a full long-term raptor migration site protocol was unnecessary to determine whether or not the project area falls within a major migratory corridor.
40	16	BR	30	9	There is an inconsistency between the EA and its Avian and Bat Protection Plan. The EA states that, "... each year prior to the onset of the migratory bird breeding season (March 15 to July 30), and once each month during the season, raptor nest surveys would be completed to identify active nests within .5 mile of a turbine." On the other hand, the Avian and Bat Protection Plan states, "Nest surveys will be conducted prior to the nesting season during the first three years and every fifth year after that. Aerial or ground based raptor nest surveys will be conducted within the entire project area and a 1-mile buffer for raptors [BLM 2007]..." This 1-mile buffer is consistent with FWS guidelines for ferruginous hawks and the Ely Resource Management Plan.	The Final EA has been revised to be consistent with the ABPP.
7	17	BR	19	10	Some of the issues that we believe were not adequately addressed include the proposed project is adjacent to a natural cave resting site and within a migratory flyway and foraging area for the Brazilian free-tailed bat (<i>Tadarida brasiliensis</i>). The most detailed study of the large cave estimates that at least one million of these bats move through the area annually. Currently, the radar proposed to manage the wind turbines during bat activity is an untested method and needs to be explored through peer-review research before it can be claimed a fail-safe form of mitigation.	The radar is one method that can be utilized to help reduce impacts to bats. Cut-in speed changes and shut-downs can also be initiated in conjunction with analysis of mortality data for annual, seasonal, and daily patterns and both have been proposed as mitigation measures in the ABPP.
8	17	BR	21	9	Sage-grouse (<i>Centrocercus urophasianus</i>) leks are situated on three sides of the proposed project area. No studies were completed to determine if the proposed project area is used as annual foraging for these birds. As the BLM is aware, this species has recently been determined as warranted but precluded for listing under the Endangered Species Act by the U.S. Fish and Wildlife Service. Development impacts on this species simply cannot be overlooked.	As stated in the EA, only one lek 2 miles to the northwest of a turbine is active. The area provides low-quality sage grouse habitat and birds were not observed in the area during general use bird surveys. However, additional information regarding local movement patterns based on SNWA-provided telemetry data has been added to the EA.
2	17	BR	29	6	We believe that additional development of BLM lands should not occur unless significant wildlife habitat mitigation or conservation on public lands occurs in tandem.	Wildlife mitigation is described in Chapters 2 and 6, as well as multiple appendices for the EA such as the ABPP in Appendix F. Additionally, compensatory mitigation has been added to Section 6.4.
12	18	BR	19	10	In Appendix F, on page 7, in Section 5.2 Turbine Curtailment, the document states that turbine curtailment in response to the migratory population of <i>Tadarida brasiliensis</i> at Rose Cave "will occur during the highest use periods of August 1 through September 30, from sunset to 4 hours after sunset". NDOW has documented substantial activity by <i>T. brasiliensis</i> at Rose Cave well into October, and it is known that in many years the bats arrive during late July. The actual use of the cave can be as long as approximately 12 weeks each fall. The turbine curtailment should occur where and when the mortality data demonstrates wildlife mortality. The TAC should provide input for the proper times and locations for curtailment to occur based upon data recovered during operation. It will be important that a sufficient robust monitoring program be developed to allow the TAC to make the best operational decisions to protect wildlife at the SVWEF.	It is understood that <i>T. brasiliensis</i> activity occurs outside of the August 1 through September 30 window. This is the initial mitigation measure for curtailment and is tied to a study to determine the most effective speeds at which to curtail. Therefore, timing must be set. Additionally, the idea is to address the period of highest use as an initial mitigation measure. If that does not address impacts, phased mitigation provides additional amounts of curtailment and also states that the timing can be altered based on data.
3	18	BR	19	10	The U.S. Fish and Wildlife Service (and an interdisciplinary committee which included the wind industry) has recently updated their guidance document for the siting of wind energy projects. The siting criteria for avoiding major bat hibernacula and migration routes in those guidelines, was not followed in the siting of the Spring Valley Project.	The project is proposed 4 miles from Rose Guano Bat Cave and was not placed along the ridgelines closer to the cave. The referenced measure to avoid bat hibernacula and migratory routes is disclosed in the EA and it is addressed by presenting a comprehensive bat protection plan (Appendix F) to address the proximity to the cave and migration area.
7	18	BR	20	6	On page 47 in Section 3.2.6, Birds of Prey, the document states that "because [no western screech owls] were observed or heard during nearly two years of preconstruction surveys and habitat in Spring Valley is limited (Floyd et al. 2007), it is assumed that this species rarely entered the project area." This species is active at night and no nocturnal wildlife surveys were conducted to determine the presence of this species. Nocturnal surveys are one of the best tools available to determine the absence or presence of a species, like the flammulated and western screech owl. The lack of data to support assumptions in the EA can lead to inaccurate analyses.	The statement commented on is from an old version of the EA and is not in the most recent EA for which these comments were submitted. In Section 3.2.6, the EA reads, "NDOW has said that western screech-owls (<i>Megascops kennicottii</i>) have been detected from the nearby Swamp Cedar ACEC, and they have been added to Table 3.2-3 as well. However, because occurrence data cannot be found for this species in the area and habitat in Spring Valley is limited (Floyd et al. 2007), it is assumed that this species rarely enters the project area. " This is the best available data for a species that does not require specific surveys. Pre-construction survey data has not been able to be linked to estimating post-construction impacts, therefore, nocturnal survey data would provide little benefit for determining impacts beyond confirming presence/absence of those species. In general, impacts to passerines, raptors, etc. are consistent for both diurnal and nocturnal species.

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17	18	BR	20	9	In Appendix F, on page 12, in Section 6.5, Nest Surveys, the document states that "birds will be banded, as possible, in order to track use on-site and determine whether there is mortality to resident birds" and "The methods for the final banding program will be determined prior to construction in consultation with the appropriate agencies." NDOW does not see the value for this study or for bird banding. Seasonality and species identified would be sufficient to determine the status of any mortality. The need for mortality mitigation should not be based upon a factor of species residency.	This section has been removed from the ABPP.
6	18	BR	20	9	On page 47, in Section 3.2.5, Songbirds, are discussed in regards to the issue of nocturnally migrating birds. The document states "it is known that many species of passerines migrate nocturnally. Nocturnally migrating passerines usually fly at great heights, sometimes as high as 925 m (3,037 feet) (Able 1970). Therefore, the assumption is that nocturnally migrating passerines would not be at a high risk of collision with WTG blades in Spring Valley." NDOW has provided comments on several occasions pointing out the lack of specific surveys for bird species that migrate at night. Bird mortalities have been documented at night at other WGF in the region. The BLM has a responsibility to ensure that adequate on-site survey work was conducted to assess this potential impact. Conclusions regarding the significance of impacts must be based upon an evaluation of data. New technology is in place to provide this data. Video and surveillance technology used to identify nocturnally migrant birds has evolved in the last few decades and is being used on other proposed wind energy projects. Finally, the height at which birds fly at night is controlled in part by site-specific factors. Data from this proposed project site or similar sites should have been utilized in the analysis in the EA to support the assumptions expressed. Insufficient data was secured within the rotor sweep area to draw conclusions.	Based on conversations with NDOW following this comment, a measure has been added to the initial mitigation measures in the ABPP to complete nocturnal surveys using both radar that will be on site as well as other means such as video technology to complete nocturnal surveys. That data will be used to help inform adaptive mitigation measures if avian mortality is found that correlates to survey data. Substantial data regarding avian use in the RSA was collected and detailed in the pre-construction avian and bat study report by SWCA. Species-specific data on passerine use in the RSA is shown in Table 4.2-3.
14	18	BR	29	6	In Appendix F, on page 7, in Section 5.2 Turbine Curtailment, NDOW requests that the chosen cut-in speed for the WGF be updated and refined using data collected from continued mortality searches as reviewed and recommended by the TAC.	Data collected from mortality searches will not provide data on cut-in speeds. However, collected data will be used to refine cut-in speed timing as described in the text for that phased mitigation measure.
10	18	BR	29	6	On page 155, in Section 6.4, Project-Specific Mitigation Measures, in the first bullet the document states "If the Proposed Action is selected, relocation of pygmy rabbits by live trapping prior to construction should be considered in consultation with the USFWS and NDOW to avoid direct mortality." Trapping and relocation of pygmy rabbits has not been proven to be effective in protecting the rabbits. There should be a discussion with NDOW and the USFWS prior to implementation of this mitigation measure.	This measure would only be implemented with the consultation and support the USFWS and NDOW.
8	18	BR	29	6	On page 74, in Section 4.2.1.2, Operation and Maintenance, Table 4.2-2 states that "low magnitude but long term [effects from wind turbine collision] for many [bird and bat] species" are anticipated. The environmental assessment goes on to state "population effects [are] possible for other species". NDOW is concerned there could be a high magnitude of mortality on the Brazilian free-tailed bat (<i>Tadarida brasiliensis</i>) from wind turbine collision given the numbers of this species of bats using the project area as a migration corridor each Fall. The magnitude of bat use in this area is supported by research NDOW has conducted in cooperation with the BLM and Bat Conservation International (Sherwin 2009). The BLM's response directly to NDOW's comment was "Potential impacts are addressed by implementation of the Avian and Bat Protection Plan (ABPP) which contains curtailment and shut-down steps." The ABPP includes five phases of mitigation using several different types of mitigation. Should bat mortalities continue despite the measures taken as described in the ABPP, NDOW recommends as a final phase, that the Technical Advisory Committee (TAC) develop measures for offsite mitigation to offset the impacts to <i>T. brasiliensis</i> . This mitigation could take the form of habitat protection, habitat enhancement or habitat creation.	Off-site mitigation is already built into the five current phases. The ABPP also contains the following statement at the end of Section 7.1 which could include additional off-site mitigation: "If thresholds are still exceeded following implementation of all mitigation measures for all phases, the BLM would meet with the TAC, other appropriate land and wildlife management agency representatives, and the proponent to determine necessary management strategies."
15	18	BR	29	9	In Appendix F, on page 8, in Section 5.2 Turbine Curtailment, the document states that "If neither of these turbine cut-in treatments have a statistically significant impact, the default cut-in speed for the turbines in the SVWEF would be set at 3.0 m/s." The BLM response to an earlier comment on this issue was "A study very similar to Arnett et al. 2010 has been designed which will scientifically determine the best cut-in speed to reduce mortality while maintaining the most possible energy output. This method uses current statistics and measureable data. If neither of these turbine cut-in treatments have a statistically significant impact, the default cut-in speed for the turbines in the SVWEF would be set at 3.0 m/s or a cut-in speed recommended by the TAC based on current science." NDOW requests that this comment be included in the text of this section.	The following has been added, "If neither of these turbine cut-in treatments have a statistically significant impact, the default cut-in speed for the turbines in the SVWEF would be set at 3.0 m/s or a cut-in speed recommended by the TAC based on current science specific to the project area may be used. If there is not enough statistical power from the study to determine an effective cut-in speed, the study will be redone with a larger dataset or a cut-in speed will be determined based on current relevant data."
13	18	BR	29	9	In Appendix F, on page 7, in Section 5.2 Turbine Curtailment, NDOW requests that curtailment be determined through a review by the TAC in order to assist in designing a project that will help maintain mortality below thresholds. The BLM's response to this earlier comment was "if the original curtailment plan/timing does not keep mortality under thresholds then additional amounts of curtailment are available in the phased mitigation. As part of those phased mitigation measures, adjustments to seasonal and daily timing may be made based upon mortality, radar, and AnaBat (for bats only) data." We request this comment be included in the text of this section.	Has been added to the last paragraph of Section 5.2.

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11	18	BR	29	10	In Appendix F, on page 6, in Section 5.1 Radar Monitoring and Mitigation Measures, there is a discussion of the use of the DeTect Merlin and Vesper radar systems and their role in turbine curtailment and shut down. This radar system is in use at the other WGF to allow for evaluation of the potential effectiveness of this mitigation measure. In addition, peer review by other specialists in this field would be important to verify that the technology is effective.	Peer reviewed data on the current facilities with this technology are not currently available. Dr. Thomas Kunz, Dr. Mike O'Farrell, and Dr. Steven Carothers have reviewed the plan and agree that the methods are appropriate and viable.
4	18	BR	29	10	Pattern Energy has offered up an operational mitigation plan for birds and bats that is unique, forward-thinking and encouraging. It incorporates technology that if proven to be effective, may become a standard for addressing mortality impacts resulting from wind energy development. We enthusiastically support the use of adaptive management in working towards minimizing wildlife mortality, the use of a Technical Advisory Committee to identify and solve project issues and the suggestion of mitigation that could be applied when anticipated mortality is exceeded.	Thank you for your support of the ABPP.
18	18	BR	30	6	In Appendix F, on page 14, in Section 7.2, Overall Avian and Bat Mortality Thresholds. Regarding mortality estimates from the eleven existing wind farms that Table 4 references, the document states "It is assumed that these thresholds are a starting point". BLM's response to our previously provided comment was "The mortality thresholds are not considered acceptable levels of mortality, but as indicators to start mitigation based on the best current information. It is also expected that the TAC will recommend adjustments in the mortality thresholds as new data becomes available." NDOW requests this comment be included in the text of this section.	Section 7.2 states, "It is assumed that these thresholds are a starting point and that the TAC will review them annually to determine their effectiveness as well as to determine whether new data are available that would help refine them; it is also assumed that the TAC will provide recommendations to the BLM Authorized Officer regarding whether or not to increase or decrease them." No additional text has been added.
16	18	BR	30	6	In Appendix F, on page 9, in Section 6.1, Mortality Surveys, the document indicates mortality surveys would occur every other week for one-third of the operating turbines. NDOW requests that the text state more clearly that mortality searches will be conducted at an appropriate subset of the total turbines and at a frequency recommended by the TAC. NDOW also requests that the document clarify that searcher bias factor be considered and incorporated into the data analysis. BLM's response to our previously provided comment was "The number of turbines surveyed and the survey frequency are considered appropriate with current studies being conducted in the U.S." Additionally, the document states, "Additionally, survey intervals may need to be adjusted based on the findings for these studies in order to ensure precise correction factors, as described by Husoo (2008). Searcher efficiency factors as well as scavenger rate will be utilized, consistent with current method, and as described in section 6.2, 6.2, and 6.3." We request that this comment be included in the text of this section.	The information in this response is included in the ABPP in the last paragraph of Section 6.1.
5	18	BR	30	10	On pages 44-48, in Sections 3.2.4 through 3.2.7, the document discusses bird distribution for the project area. The document relies on observations of wildlife species from the proponent's preconstruction surveys to predict which species might be impacted. On several previous occasions, NDOW has raised concerns regarding the adequacy of many of the proponent's wildlife surveys to aid in the identification of anticipated impacts. The BLM's response directly to NDOW was "Surveys for birds in the project area were done using typical methods for evaluating wind farms, such as general use bird point counts, breeding bird point counts, and raptor nest surveys. Quantitative, preconstruction surveys such as these are likely to yield more robust estimates of species occurrence and abundance than state atlas data. Additionally, protocols were developed in coordination with BLM, Hawkwatch International, and the Great Basin Bird Observatory." This response does not resolve our concern regarding the adequacy of surveys to evaluate the impacts of the proposed project; in fact, we continue to maintain that the statement comparing preconstruction surveys to state atlas data as "Likely...more robust" is erroneous, particularly in consideration of the level of effort invested in the preconstruction surveys for this project site. A comprehensive preconstruction wildlife survey policy needs to be developed to address wind energy.	Currently there is not an official policy for preconstruction surveys in Nevada; however, surveys of this site were done based on methods from surrounding states such as California and Arizona, as well as from coordination with expert groups such as Hawk Watch International and Great Basin Bird Observatory. Additionally, survey protocols were provided to NDOW in June 2007 for review.
1	19	BR	30	10	Additional information is needed in regard to anticipated bird and bat mortality in the Spring Valley Wind Energy Facility Project Area. With such a large number of birds and bats frequenting the area, it is imperative to know how minor or severe the impact will be before construction begins. These studies should include focus on the greater sage-grouse, golden eagle, and special-status bats.	Two years of pre-construction avian and bat surveys were completed for the project. To date pre-construction data is useful to help with siting, but a strong correlation between pre-construction data and post-construction mortality numbers has not been found (NWCC 2010). Therefore, additional surveys would not provide additional data that would change the analysis or mitigation presented.
1	20	BR	19	8	Especially in light of the decimation of the bat population by White-Nose Syndrome, we simply cannot afford to "experiment" with massive bat slaughter. We need to stop all bat killing activities until either White-Nose is brought under control or Big Wind has peer-reviewed, proven techniques to avoid any bat mortality.	This project is being developed to produce renewable energy and the EA utilizes proven methods as well as additional experimental methods developed by professionals in wind/wildlife interactions to manage possible impacts so that they remain below significant levels. Addressing white-nose syndrome is outside the scope of this project and associated EA. Many peer-reviewed methods are proposed for this project, such as turbine cut-in speed, which has been effective in reducing bat fatalities by 53% to 87%. In addition, the turbines can be shut down for up to 37, 500 turbine hours during higher risk times of the year.
3	20	BR	20	10	Add in raptor deaths and the inevitable rodent overgrowth and we will start seeing all the rodent-borne diseases surging again, from Bubonic Plague to Lyme Disease and Hantavirus-again these are debilitating, deadly illnesses that are only kept in check by keeping the ecosystems in balance. Killing raptors is a really, really bad idea.	Measures have been developed in the ABPP (Appendix F) to address raptor mortality. Additionally, claims of rodent overgrowth and rampant disease are unsubstantiated.
5	21	BR	19	7	Large wind turbines are hazardous to bats.	Extensive measures have been developed to mitigate impacts to bat species. See Appendix F.

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1	21	BR	19	10	The proposed Spring Valley wind energy project utilizing 75 wind turbines should be canceled due to possible negative impact on 3 million Mexican free-tailed bats which roost at nearby Rose Cave.	Measures have been developed to mitigate impacts to Mexican free-tailed bats and all other bat and bird species. See Appendix F.
4	21	BR	20	6	Large wind turbines are hazardous to birds.	Potential impacts to all birds, including passerines, are described in the EA in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 using the best available data and currently accepted methods. The ABPP (Appendix F) includes measures to reduce avian mortality.
3	22	BR	30	10	The impact on wildlife may be under "consideration" by BLM and the builders, but I bet it is totally unknown the exact impact until after this nightmare is built, then it will be just a little later for the bats, and the deer and elk and antelope and cattle wherever these wind turbines are built. As a sportsman, I am truly concerned about the wildlife, and the potential absence thereof.	It is correct that an "exact" mortality cannot be determined, however, the analysis has been done using best available data and currently accepted methods. Conservation and mitigation measures, included those in the ABPP (Appendix F) have been developed to manage possible impacts to levels below significance.
87	26	BR	3	10	There is no way all of these systems will be effective in preventing significant impacts from an ill-sited project like this. No experiments can be conducted on these Volant species and populations can be conducted without an EIS.	An EIS does not dictate the level of surveys or mitigation necessary to reduce impacts. The EA utilized proven methods as well as additional experimental methods developed by professionals in wind/wildlife interactions to manage possible impacts so that they remain below significant levels.
65	26	BR	19	10	How might these changes in turbines affect the bats and their flights? Will air currents change? To what degree do the turbines themselves alter air flow? Under what conditions may the "plumes" not be detected sufficiently in advance? How many bats will be killed if the system doesn't shut down and a plume gets goes undetected or gets impacted? Dozens? Hundreds? Thousands? There is so greatly inappropriate a site for a wind farm. BLM must deny the permit.	The effects on bat behavior are described in Sections 4.2.2.7.2 and 4.2.3.7.2 of the EA. Air currents are altered on a short-term, site-specific level as wind passes though the turbines, but air currents will not be altered in the context of Spring Valley. The on-site radars will be tested prior to controlling turbine shutdowns to ensure detection of bats leaving the cave. In addition, an acoustic detector will be placed and the entrance of the cave to provide arrival and departure data. In the short term, a plume may go undetected and some percentage of the plume may be killed. However, the ABPP includes adaptive measures to ensure long-term impacts effecting populations do not occur. It should also be noted that shut-downs and cut-in speed changes can be implemented without radar, based on use and mortality monitoring data.
90	26	BR	19	10	How many bats will die while waiting for a "next phase" of curtailment to kick in?	An exact number of individuals killed cannot be determined, however, additional curtailment can be implemented almost immediately following exceeding of a threshold.
86	26	BR	20	7	We view it as an outrage that the proponent (and apparently BLM and NDOW) consider some avian species "expendable" and their presence even in significant numbers, would not result in the project being shut down.	The EA does not state that any avian species are "expendable" and a detailed ABPP (Appendix F) has been developed to address potential mortality. The mortality thresholds are indicators to start mitigation based on the best current information. It is also expected that the TAC will recommend adjustments in the mortality thresholds as new data become available.
61	26	BR	20	8	Why is it somehow acceptable that Texas mortality is at levels "expected"? Why isn't industry simply siting these projects responsibly - and not in a Volant species Hotspot? Levels "expected" says nothing about the severity of the impact to a particular species - like Yellow-Billed Cuckoo, Loggerhead Shrike, Golden Eagle, various warblers, thrushes, flycatchers, and other rare and declining migratory birds and raptors.	Mortality levels in Texas and how the industry is siting projects as a whole is out of scope for this project and associated EA. This EA is focused on the Spring Valley Wind project located in Nevada.
50	26	BR	20	9	The EA states that the golden eagle was observed in the RSA "constituting 30.8% of the observations during passerine surveys and 50% of the species' observations during raptor migration surveys". Golden Eagles disperse over large areas and several mountain ranges in the Great Basin. Constant mortality at Spring Valley is likely to result in serious declines in local and potentially regional populations.	Golden eagle were observed on less than 20% of raptor migration surveys and are rare mortalities at wind facilities. The ABPP, which includes golden eagle specific mitigation, has been developed to prevent the possibility of any serious declines.
89	26	BR	20	10	How many birds will die while waiting for a "next phase" of curtailment to kick in?	An exact number of individuals killed cannot be determined, however, additional curtailment can be implemented almost immediately following a threshold being exceeded. The mortality thresholds are indicators to start mitigation based on the best current information. It is also expected that the TAC will recommend adjustments in the mortality thresholds as new data become available.
42	26	BR	20	10	A very large number of nesting raptors was detected - in the project area and within one mile. How many miles do Golden Eagles, Ferruginous Hawks, any other raptors forage from nest sites?	Data collected for the project area over two years indicate that nesting raptors are relatively low in the area. Only one active nest actually occurs within the project area, and none occur within 1/2 mile of a turbine for BLM's selected alternative. Additionally, raptors foraging in the area is described in EA Section 3.2.6.
67	26	BR	20	10	There is no real analysis of the severe likely effects to Golden Eagles, wintering Rough-Legged hawks, and other wintering raptors that may be attracted to the valley, with its unique mountain of large size, relative diversity of pasture and desert lands, power line perches, relatively abundant irrigation and water areas, often snow-free valley floor vegetation, as well as mountain slopes for year-round diversity of prey types. The diverse setting that includes water areas contrasts with most other snow-free valleys in the Great Basin. The toll taken on wintering raptors is likely to be very severe.	Detailed analysis of impacts to raptors specific to this site are described in Sections 4.2.2.6 and 4.2.3.6 using the best available data and currently accepted methods. The ABPP (Appendix F) was designed to address potential mortality issues year-round.
38	26	BR	20	10	The EA at 47 claims that nocturnal migrating passerines would not be affected. This ignored the impacts of bad weather, migrating passerines forced down into the valleys for several days - as occurred in spring 2010 in much of central Nevada. Detailed ground-based surveys over a 10 mile or more area - including edges and valley bottoms should have been conducted.	The EA states, "Nocturnally migrating passerines usually fly at great heights, sometimes as high as 925 m (3,037 feet) (Able 1970). Therefore, it is assumed that nocturnally migrating passerines would not occur within the rotor-swept area (RSA) of the WTGs in the project area with the exception of a flock using the area as a short stopover." This statement addresses the potential for nocturnally migrating birds to stop in the area for a short time. The impacts analysis for birds considers nocturnal migrants and the ABPP (Appendix F) provides mitigation measures that would reduce potential impacts to those species during high use, low visibility weather events.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
43	26	BR	20	10	The EA uses a quote from HWI pointing out the significance of the SNAKE RANGE to migrating raptors. To claim just the opposite, in a clumsy attempt to minimize adverse impacts to raptors. The Snake Range is the Range that lies right next to the eastern project boundary. It is also where Rose Guano Bat Cave is located.	The statement is supporting the fact that raptors tend to migrate along large geographic features such as ridgelines and use valley bottoms such as where the project area occurs for migration much less frequently.
37	26	BR	20	10	The valley and steep basin and range topography are so unique. This includes some flowing streams in the Schell Creek Range and other areas that are likely to serve as important refueling stops for migrants. It is extremely likely that with adverse weather, migrants will be killed in large numbers in the valley below.	The project is not proposed within the adjacent mountain ranges or near flowing streams. Potential impacts to all birds are described in the EA in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 using the best available data and currently accepted methods. The ABPP (Appendix F) includes measures to reduce avian mortality.
33	26	BR	20	10	This area is an important area for migratory birds. The valley is a magnet for wintering Golden eagles and other raptors, for example. So just as with Brazilian free-tail bats, large losses of wintering raptors may have impacts that reverberate over a vast land area, and may affect not just local but regional populations.	Potential impacts to all birds, including raptors, are described in the EA in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 using the best available data and currently accepted methods. The ABPP (Appendix F) includes measures to reduce avian mortality.
68	26	BR	20	10	To the north is the Goshute Range, a very arid range with limited riparian areas. However, it is a magnet for raptors. Migrating songbirds rely on riparian vegetation or moister valley areas to provide insect foods. These lands in and surrounding the Project Area may be especially important for migrating avian species.	Migration has been studied for the project area and is described in the EA in Section 3.2.
46	26	BR	21	6	The EA states "no specific greater sage-grouse surveys were completed". Yet there are several leks within 5 miles of this project and siting in this location would likely cut off movement north-south further isolating populations. Every other wind or energy project of which we are aware in recent years has provided significant info and monitoring info on Sage Grouse. Can Ely BLM really be serious, and let this project further destroy, reduce and fragment already small and declining Sage Grouse populations? The EA again indefensibly points to acres of sagebrush in the valley - as somehow implying all acres are created equal. There is NO analysis of the specific habitat characteristics and components affected, or the cumulative effects of all the gravel pits, road, lines, associated with this SNWA, and other foreseeable energy development n habitats and populations for any sensitive species. Necessary monitoring and mitigation cannot be applied without concrete biological data. Please review all the Chapters of the Studies in Avian Biology monograph on Sage Grouse (Knick and Connelly 2009). This information is available at the USGS Website, and Ely BLM must be aware of it. WWP has submitted this info to Ely BLM on numerous occasions, as well.	The project area is surrounded by existing roads, transmission lines, ranches, and agricultural areas, and the area has been heavily grazed. These factors led to the determination of low-quality habitat in the area. Higher quality areas are described in the EA as those along the benches. Analysis of the loss of impacts is included in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently acceptable methods. The cumulative impact to grouse, including those from SNWA, are described in Section 5.2. Compensatory mitigation has been included in Section 6.4.
47	26	BR	21	9	What is the status of the populations of Sage Grouse throughout the valley? How will this project fragment, reduce, and destroy habitats?	No studies specifically on the population within the entire valley have been completed; however, a much higher number of active leks has been recorded in the northern portion of the valley. A description of habitat impacts is provided in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently acceptable methods. Additionally, a summary of SNWA's recent sage-grouse telemetry study has been added to Section 3.3.4.
48	26	BR	22	6	What is the status of the populations of Pygmy Rabbits throughout the valley? How will this project fragment, reduce, and destroy habitats? How do the project area burrows connect to any other active burrows, potential habitats, occupied habitats?	No studies specifically on the population within the entire valley have been completed; however, larger areas of contiguous tall, dense sagebrush providing better habitat are located south of the project area. Burrows in the project area are not connected to other burrows. A description of habitat impacts is provided in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently acceptable methods.
27	26	BR	28	6	The grave risk of rehab failure in this harsh arid site is not addressed.	The Restoration Plan includes adaptive management in Sections 3.2.3 and 4.1.1 if restoration is not successful.
6	26	BR	28	6	There is also no valid analysis of how extraordinarily difficult any rehab or restoration actions may be in association with any part of this ill-sited project.	The EA states that restoration could take 10 years and that timeframe is considered in the analysis for impacts. Additionally, the Restoration Plan in Appendix A provides means and methods for measuring success and addressing non-success.
11	26	BR	28	10	This valley area is highly sensitive to disturbance, and receives minimal precipitation so any recovery or rehab is extremely difficult and likely impossible given all the expanding weed threats and continuing grazing disturbances. Ely BLM informed me that lands on the east side of the valley in Taft Creek and other areas has burned in the 1990s, yet only weeds and a few scraggly grasses occur in these sites - a decade or more later. Any recovery of wind farm- disturbed areas is long-term and in many instances irreversible. With continued grazing disturbance, it is likely to be impossible.	Restoration can be achieved by utilizing the correct methods. The EA states that restoration could take 10 years and that timeframe is considered in the analysis for impacts. Additionally, the Restoration Plan in Appendix A provides means and methods for measuring success and addressing non-success.
80	26	BR	29	6	The Project-Specific mitigation measures are minimal and greatly inadequate. Why is no disturbance to any pygmy rabbit not being considered? Where is detailed mapping to understand all habitats, with requisite complex shrub structure? Moving rabbits is not mitigation. It is salvage - and shows the project developer only desires to shove anything that stands in the way of destruction aside. There is no info or analysis of where any rabbits would be places, potential for spreading diseases, condition of any habitats especially since Ely BLM Veg treatments have so greatly reduced and destroyed Pygmy Rabbit habitats. Botanical studies in full must be conducted as part of an EIS process, not as an afterthought on the eve of turbine construction. This too is not "mitigation".	There are substantial conservation and mitigation measures listed in Chapters 2 and 6 of the EA as well as its appendices. Disturbance to pygmy rabbit is disclosed and analyzed in Sections 4.3.2.1 and 4.3.3.1 using best available data and current methods. Mapping of vegetation and species habitat is available in the biological report prepared by SWCA and is described and quantified in the EA. The EA describes the habitat on site and the selected alternative includes avoiding occupied and high-quality pygmy rabbit habitat. Assessment of impacts to botanical species was completed using the best available data and includes mitigation and conservation measures as necessary.

Table H.4. Comment Response Table

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82	26	BR	29	10	We believe that full shut down during spring, summer, and early fall is the only safe mitigation. The proponent has persisted in pursuing a facility in one of the worst places imaginable for Volant species.	This would not meet the purpose and need for the project. The ABPP does however include extensive shut-downs and cut-in speed changes that could be implemented during those times if thresholds are exceeded.
85	26	BR	29	10	Aren't there other very significant bat caves, including maternity caves, in this areas too? Just putting a radar unit at Rose Guano will not protect the other bats that use this unique limestone cave region.	Bat use, including caves, is described in Sections 3.2.8 and 3.3.6. Three radar units would be placed within the project area to address both birds and bats. No radar units would be placed directly at Rose Guano Cave.
79	26	BR	29	10	There is no valid analysis of all the current and foreseeable stresses on the populations of important and sensitive and imperiled species threatened by this project, and the sequential development and massive industrialization of Spring Valley. Thus there is no way that appropriate mitigation can be understood.	All analysis presented in the EA is based on the best available data and is consistent with the BLM NEPA Handbook, the BLM Wind PEIS, and other currently accepted methods. The EA also includes analysis of the cumulative impacts of past, present, and reasonably foreseeable projects in Section 5.0.
57	26	BR	29	10	This EA and the greatly inadequate mitigation/monitoring Plan violates BLM's policies for sensitive species, the federal candidate species Greater Sage Grouse, and for protection of Golden Eagles and other rare wildlife.	As described in the EA, all regulations have been or will be met through the approval process.
93	26	BR	30	6	The avian surveys, including those for Golden Eagle, have been greatly inadequate. Distances used to consider impacts are - frankly - laughable. The EA avian impacts analysis is biologically indefensible, BLM and the proponent ignored significant public input and concern.	Currently there is not an official policy for preconstruction surveys in Nevada; however, surveys of this site were done based on methods from surrounding states such as California and Arizona, as well as from coordination with professional/expert groups such as Hawk Watch International and Great Basin Bird Observatory. The ABPP addresses additional survey efforts to address potential impacts. The analysis in the EA is based on current biological and ecological knowledge and backed up by current literature using the best available data. Public input was incorporated into the process and used to help develop the action alternative as well as analysis and mitigation measures.
29	26	BR	30	6	The site specific Baseline data for nearly all elements of the environment is greatly lacking. Spring Valley Wind (Pattern Energy/The Carlyle Group) couldn't even be bothered to conduct necessary Baseline surveys to determine salt desert shrub, sagebrush, and other vegetation types and their complex interspersions and current ecological condition and risks in detail so the degree of loss can be understood, the proper mitigation developed, the severity of weed infestation at present, or following any development be understood, and much other necessary data and analysis occur. This is also necessary to use in a comparison with other potential sites - such as brownfields or weedlands.	A description of the baseline vegetation communities within the Spring Valley Watershed and Alternative Action areas is presented in Table 3.3-1. A Weed Risk Assessment including required preventative measures is presented in Appendix G of the Preliminary EA. The restoration plan (Appendix A) also provides a description of the on-site vegetation and measures to restore it after use.
45	26	BR	30	6	The EA attempts to translate acres of habitat into "habitat availability" for species. This too is biologically indefensible. Many complex factors enter into the habitat "value" for sensitive species. For example, Sage Grouse, a landscape species, move over large areas of the landscape over the course of the year, and a complexity of sagebrush communities are required to fulfill these needs. Sagebrush used by the Sage Sparrow is NOT the same as the sagebrush used by Sage Thrasher. The EA discussion of Sage Grouse demonstrates BLM is violating its own IMP and Conservation Policy for this species.	Sections 4.3.2.4 and 4.3.2.4 contain analysis on the impacts to grouse habitat as well as behavioral effects. Although within an area designated as winter habitat, the area was delineated at a coarse scale and locally, the habitat is low-quality. The use of the area is described in Section 3.3.4.
44	26	BR	30	6	NEPA requires sound and rigorous review of science. Unfortunately, in the case of SVW EA, all the public gets is Project proponent-serving statement. limited to Baseline info, and cover-up of the severe biological conflicts that siting a bat, migratory bird and raptor killing project in this critical area would have.	Two years of intensive bat and avian surveys were conducted in the project area. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
30	26	BR	30	6	"Plan at 3 states: Bat activity was generally much greater in survey locations near sources of water. Activity was dominated by four bat species: western small-footed myotis, little brown bat, long-eared myotis, and Brazilian free-tailed bat. The remaining eight species contributed 9% of all data. While all bats should be considered to be at risk from injury or mortality at WEFs, published literature indicated that some species are more commonly reported as mortalities in the western United States (Arnett et al. 2008; BLM 2005). For example, complications of multiple bat mortality studies at two other WEFs in the western United States, Arnett et al. (2008) and BLM (2005) have shown that the big brown bat, silver-haired bat, western red bat, hoary bat, little brown bat, and Brazilian free-tailed bat accounted for all identifiable bat carcasses from available bat mortality studies." Shouldn't this have caused even greater alarm among agency biologists, and resulted in telling the project proponent to find another much less sensitive and critical site? What political power or "pull" does SVW have on this biologically calamitous project is being pursued?	The alternative development alternative (BLM's selected alternative) includes siting away from high-use areas such as the water sources cited in this section.
70	26	BR	30	6	EA Section 4.2.12, various Tables and Texts describe effects related to a "typical" wind facility. This is NOT a typical setting, so such minimal analysis is invalid.	Because the EA tiers to the analysis in the BLM Wind PEIS, this section summarizes the relevant impacts described in the Wind PEIS, not the specific impacts of the proposed Spring Valley Wind Energy Facility. Section 4.2.2 goes on to describe the project-specific impacts.

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71	26	BR	30	6	It is hard to follow the analysis in the EA. Sections 4.2.2.5 claim impacts to songbirds would generally be the same as the PEIS - yet full area-specific studies necessary to understand impacts including under adverse weather, have not been conducted. Necessary site-specific studies to determine any "avian mortality threshold" have not been conducted. There has been no valid local, regional or rangewide avian or bat population analysis and cumulative impacts analysis, so the statement that the mitigation measures address this is invalid (EA at 84, 86, 88)	Two years of intensive avian surveys were conducted in the project area, including during inclement weather. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory. To date, pre-construction data have not been successful in predicting actual mortality numbers. However, a threshold has been developed by evaluating other current projects that have similar habitats and species present.
92	26	BR	30	6	Our previous comments requested and identifies the need for a greatly expanded environmental Baseline studies, and detailed analysis of the status Sage Grouse, Pygmy Rabbit and other rare species in the region, and in the landscape affected by the project. The same analysis must be applied to rare plants and pollinating insects, rare bats, Loggerhead Shrike, Golden Eagle and all other species. Then, what other stresses may occur to populations that would increase or amplify risks of the wind facility? For example, the Elko BLM Website has a PDF warning the public about adverse effects of White Nose disease in bats. If Brazilian freetail bat population is exposed, how might that change any estimates of viability? Despite great concern over the impacts to the Brazilian Freetail Bat and other important and rare biota, the magnitude of risk still has not been adequately defined.	All analysis presented in the EA is based on the best available data and is consistent with the BLM NEPA Handbook, the BLM Wind PEIS, and other currently accepted methods. The EA also includes analysis of the cumulative impacts of past, present, and reasonably foreseeable projects. Unknown stresses to current populations that are not reasonably foreseeable cannot be included in the EA. Furthermore, inclusion of speculative risks, such as white-nose syndrome, is outside the scope of this project and associated EA.
28	26	BR	30	6	Our review of the latest EA and this Plans/Appendices finds that the biological data and analysis, and assumptions that serve as the basis for the plan are greatly inadequate. Adequate Baseline surveys over a sufficient land area, as well as over a sufficient period of time and repetition of surveys over varying weather conditions over a period of years still have not been conducted. Thus, there is no way to develop a valid Plan for wildlife. Please see WWP comments on the first PEA, discussing the biologically indefensible limited distance raptor, migratory bird, and other surveys were conducted. The EA/Plan provide a greatly inadequate description of the setting of the topographic features and biotic communities that support globally significant populations of rare bats and migratory birds, raptors and other native wildlife.	The analysis in the Preliminary EA and the mitigation measures presented in the ABPP are supported by two years of intensive bat and avian surveys that were conducted in the project area, including during varying weather conditions. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
69	26	BR	30	6	Section 4 of the EA fails to provide necessary detailed site-specific analysis including full consideration of adverse effects, and science demonstrating adverse effects. General and vague terms are used to describe impacts. Examples: "greatest effect in highest noise areas". Well, what will be the highest noise, and how will each species of concern be affected by it? What will the cumulative effect of all noise be? This type of analysis must be done for all adverse effects so that the severity of effects can be fully understood. Then, absurdly on page 79, the EA appears to claim that 55 dBA is "consistent with the current ambient noise."	It is not clear where the reference "greatest effect in highest noise areas" comes from or the context from which it was taken. In Section 4.2.2.1.1 of the Preliminary EA it states: "Increased noise associated with construction activities would reduce the quality of reptile and amphibian habitat intermittently throughout the 9- to 12-month construction phase. Noise levels for typical equipment that would be used during the construction phase range between 80 to 90 dBA at a distance of 50 feet. The intensity of construction activity would vary over the course of the 9- to 12-month construction phase as equipment is moved throughout the area to complete the different facilities, infrastructure, and WTGs. Increased noise from construction would lead to habitat avoidance and would disrupt the foraging and reproductive behavior of reptiles and amphibians for the duration of the construction phase." This analysis describes the specific noise levels, and distances to those noise sources as well as the effect to wildlife.
88	26	BR	30	6	The 30,000 wildlife study funding is greatly inadequate. Three years of mortality studies are greatly inadequate. The species-specific mortality thresholds are fraught with uncertainty - this whole complicated system appears to be nothing but an elaborate cover-up for a devastating and destructive wind project that everyone knows should NOT be located in this fragile remote and biologically important area. We note Table 4 average mortalities - instead of looking at Judith Gap mortalities and likely much great mortalities as what will occur here. Why is there a limit to curtailment?	The ABPP includes up to five phases of mitigation including up to \$100,000 of funding for additional studies and on- and off-site mitigation in phase V. If mortality thresholds are exceeded following the third year, the TAC may recommend additional years of mortality studies be conducted to evaluate the effectiveness of mitigations. In addition, mortality surveys will be conducted every 5th year to ensure mortality levels remain below thresholds. Section 7.3 of the ABPP states provides the explanation for species specific mortality thresholds: "To determine species specific mortality thresholds, the relative abundance of that species has been determined using preconstruction survey data. That number is then used as a percentage of the overall mortality thresholds to determine the species indicator. The indicator is then multiplied by a species status factor to determine the species specific mortality threshold." The ABPP goes on to state that these numbers may be changed based on post-construction monitoring data. Changes in cut-in speeds stop being an effective mitigation at a certain point - that is why turbine shutdowns are added as a potential mitigation starting in phase II.
41	26	BR	30	6	The EA draws sweeping conclusions related to raptors without ever revealing if info was collected during adverse periods of spring and fall weather (RA at 47).	Two years of intensive avian surveys were conducted in the project area, including surveys for raptors during inclement weather.
34	26	BR	30	6	The proponents had a whole spring/early summer field season to greatly improve data acquisition and analysis and did nothing it appears. This is the same stale, limited info from the PEA.	Total survey effort for all bird surveys was more than 370 hours of survey time. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.

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66	26	BR	30	6	There is no valid analysis of the Worst Case, or even a Bad Case scenario. For example, the May-early migration period June 1020 was very cold and wet. During these conditions, I was hiking, camping and riving in similar habitats in central and northern Nevada. Migratory birds were bottled up down in valleys. They were desperate for insect food, landing on roads in valleys and suffering impacts from vehicle collisions. There is no valid analysis of the unique landscape for migrating birds and bars that this valley and adjacent mountain ranges provide. There is no valid analysis of the differing conditions and risk scenarios associated with spring vs. fall migration.	Two years of intensive bird and bat surveys were conducted in the project area, including during inclement weather and in all seasons of the year. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory. Additionally, on-site radar will be monitoring for large-scale events and will be able to adapt to those situations and create turbine shutdowns if needed.
49	26	BR	30	6	Without detailed Baseline site specific and field data, monitoring info from the site over all periods of time, risk analysis of likely losses to habitats and populations, and examination of the battery of cumulative effects faced by the affected populations, BLM can not possibly determine the degree of severity of habitat and population losses and fragmentation, or appropriate monitoring or mitigation. Nor can BLM have examined a reasonable range of alternatives.	Two years of intensive bird and bat surveys were conducted in the project area, including during inclement weather and in all seasons of the year. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
40	26	BR	30	7	Do where is the scientifically responsible upfront collection of data so the full impacts can be understood? It is utterly lacking in the meager EA.	Two years of intensive bat and avian surveys were conducted in the project area. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
36	26	BR	30	7	EA Section 3.2.5 states "biologists conducted more than 170 hours of bird surveys". This is almost nothing, compared to the effort made at other wind projects in the West. BLM must fully compare this meager effort to that at other large-scale public land wind development areas.	Total survey effort for all bird surveys was more than 370 hours of survey time. The 170 hours of general bird surveys refers specifically to surveys other than the raptor migration surveys. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
35	26	BR	30	7	For a project of such magnitude with such tremendous potential to kill migrating birds in spring and fall, and resident birds and wintering raptors, the amount of biological survey time and the area of the survey are extraordinarily meager.	Two years of intensive bat and avian surveys were conducted in the project area. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
39	26	BR	30	9	EA at 46 describes info as "in the project area". Why has radar data not been collected throughout the years? This has been decried for many years.	Based on conversations with NDOW following this comment, a measure has been added to the initial mitigation measures in the ABPP to complete nocturnal surveys using radar that will be on site. That data will be used to help inform adaptive mitigation measures if avian mortality is found that correlates to survey data. Reliable data regarding avian use in the RSA was collected and detailed in the pre-construction avian and bat study report by SWCA.
83	26	BR	30	9	Why haven't two full years of radar studies using all this equipment already been conducted? This is just the type of Upfront biological info that is necessary for inclusion in an EIS.	Based on conversations with NDOW following this comment, a measure has been added to the initial mitigation measures in the ABPP to complete nocturnal surveys using radar that will be on site. That data will be used to help inform adaptive mitigation measures if avian mortality is found that correlates to survey data. Reliable data regarding avian use in the RSA was collected and detailed in the pre-construction avian and bat study report by SWCA.
60	26	BR	30	10	There is no way to predict "expected" mortality here - since the surveys have been so poor for birds, population effects unaddressed. With bats, this is an irreplaceable population in the intermountain West. What happens if the radar fails? If the turbines don't get shut down in time? Plus - what are the avian species? Isn't the severity of impacts also related to the rare or declining species most jeopardized?	Two years of intensive avian surveys were conducted in the project area. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory. Peer reviewed data on the current facilities using the early warning system radar technology are not currently available. Dr. Thomas Kunz, Dr. Mike O'Farrell, and Dr. Steven Carothers have reviewed the plan and agree that the methods are appropriate and valid. The adaptive nature of the ABPP will ensure that additional mitigation is implemented if previously implemented mitigation, such as the early warning radar system, is determined to be ineffective. Appendix F Table 5 identifies species-specific mitigation for special status species birds. This would limit the number of individuals of rare or declining species that could be killed before species-specific mitigation would be implemented.
63	26	BR	30	10	"As described later in the phased mitigation measures, the radar system may also be used as an 'early warning' system, providing advanced detection of bird or bat activity that presents mortality risk with the ability to shut down turbines. If this method is implemented, any time the radar system detects a group of birds or bats (group size determined through at least a year of radar studies) within approximately 1/4 mile of the project area, coupled with low visibility for birds, and thresholds number of species within the RSA, the system will communicate with the turbines and they will automatically break and feather until the group exists the project area. The distance out to which the radar could initiate shutdowns will be evaluated as enough data are collected and adjusted as necessary..." This is absurd. How was a "threshold" determined for species - or the number of animals - to be viewed as expendable. Which species ARE expendable? What number of animals of each species are expendable? What info on local and regional populations, and existing and foreseeable threats to habitat is this based on? There is greatly inadequate biological data provided to determine what, if any, level of activity, number or type of species is expendable. A 1/4 mile distance is too close, distances of several miles might be considered.	The methodology for determining projected mortalities is speculative. Instead of speculating on what actual mortality numbers would occur, Section 4.2.2.7.2 of the Preliminary EA describes the bat mortality threshold based on an assessment of 11 other wind energy projects with the most similar habitats or environmental factors available. The thresholds are listed in Appendix F: Table 3 of the Preliminary EA. The assessment provides an average mortality rate for those facilities so as to not exceed typical impacts from a wind project in similar habitats; and therefore, remain consistent with the Wind PEIS analysis. Section 7.3 of the ABPP provides the explanation for species-specific mortality thresholds: "To determine species specific mortality thresholds, the relative abundance of that species has been determined using preconstruction survey data. That number is then used as a percentage of the overall mortality thresholds to determine the species indicator. The indicator is then multiplied by a species status factor to determine the species specific mortality threshold." The ABPP goes on to state that these numbers may be changed based on post-construction monitoring data.
32	26	BR	30	10	It is hard to believe that greatly expanded (expanded in areal extent, location, duration, intensity) Golden Eagle, other Raptor, migratory bird, bat use, and other studies were not conducted?	Two years of intensive bat and avian surveys were conducted in the project area. Surveys were designed following widely accepted protocols and recommendations from groups such as Hawk Watch International and the Great Basin Bird Observatory.
19	27	BR	19	6	The cumulative impact of multiple wind facilities in Spring Valley are likely to greatly impact the species.	Cumulative impacts to bats are disclosed in Sections 5.1 and 5.2 of the EA.

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21	27	BR	19	9	The Draft EA, on page 88 (sct 4.2.2.7.2), makes an outlandish accusation that researchers have not been able to make a strong correlation between wind turbine mortality for bats, citing NWCC (2010) which is then not given the Literature Cited. This statement is not accurate and aims to dismiss the mortality of wind turbines on bat fatalities. In fact, recent scientific reports have shown that wind-energy facilities have killed large numbers of bats in the United States and elsewhere (see Arnett 2005; Johnson 2005; Durr and Bach 2004; Hotker et al. 2004; UNEP/EUROBATS 2006). Until recently, little attention had been paid to bat fatalities at wind-energy facilities. The scarcity of data on bat mortality had been due to the rarity of post-construction studies that specifically were designed to detect bat fatalities. Now that scientific methods are in place to directly assess bat fatalities, and since have shown large numbers of bat fatalities, it must be required for this SVWE Project that post-construction monitoring estimate bat mortality and prevent the mortality rate to exceed a threshold set specifically for bats within the Spring Valley area.	The NWCC was mistakenly omitted from the literature cited and has been included. The statement does not attempt to say that bat mortality does not occur, but rather states that to date, researchers have not been able to utilize pre-construction data to accurately estimate post-construction mortality numbers for bats or birds. The potential for mortality to bats, as well as a threshold, is disclosed in the EA in Sections 4.2.2.7 and 4.2.3.7. The threshold and associated mitigation are also described in the ABPP (Appendix F).
22	27	BR	19	10	Because wind-turbine size may impact mortality rates of bats, the Draft EA must address how the proposed size of wind turbines at the SVWEF are likely to impact bats.	The potential for mortality to bats is disclosed in the EA in Sections 4.2.2.7 and 4.2.3.7. This assessment is based on the specific size and location of turbines for the project.
23	27	BR	19	10	Because of the CTGR's concern for turbine-related bat mortality, we are happy to see that adaptive management will be implemented to protect bat species and their migrations through Spring Valley. Because of the importance of Spring Valley as our ancestral homeland and the high risk of large Brazilian free-tailed bat mortalities within the proposed project area, the CTGR must have an opportunity to review and comment on the adaptive management plan for bats and the annual monitoring and management reports.	The ABPP (Appendix F) was included as an appendix to the EA and was available for public comment at the same time as the EA. Post-construction mortality data will be available to the public.
17	27	BR	19	10	The CTGR is greatly concerned about the potential impacts of the proposed wind energy project on bats and their migratory corridor. Clearly, one of the major impacts from WTGs is the death toll of bats. In particular, the Brazilian free-tailed (<i>Tadarida brasiliensis</i>) has a major migratory corridor through Spring Valley and the Rose Guano Cave (ca. 4 miles from the proposed energy facility) serves as a major stop-over for >1 million of those individual bats. This is of great concern to the CTGR because the migration in eastern Nevada and in our ancestral territory is a unique biological phenomenon that should be conserved rather than ecologically taxed.	Large mortality of bat species has been recorded at some wind facilities, primarily when sited without evaluation of resources and implementation of appropriate mitigation measures. Although this facility is near Rose Guano Cave, careful placement of turbines away from heavily used areas such as water sources and agricultural fields has been proposed to help reduce impacts. Additionally, the ABPP (Appendix F) provides a comprehensive adaptive management plan to address mortality that includes turbine cut-in speed which has been effective in reducing 53% to 87% of bat fatalities as well as robust hours for which the turbines could be shut down during high use times of the year.
24	27	BR	20	10	Because of the cultural significance of birds in Spring Valley to the CTGR and their associated mortality risk from the SVWEF, the CTGR must have an opportunity to review and comment on annual post-construction bird monitoring and the adaptive management plan associated with the SVWEF.	The ABPP (Appendix F) was included as an appendix to the EA and was available for public comment at the same time as the EA. Post-construction mortality data will be available to the public.
14	27	BR	21	10	The Draft EA fails to fully describe potential impacts to the sage grouse and its habitat, a BLM-sensitive species that has been subject to listing petitions and lawsuits under the Endangered Species Act. The Draft EA states that no sage grouse-specific surveys or habitat assessments were conducted, but that individuals are known to occur within close proximity of the project site and that potential habitat exists on-site. Further, research has demonstrate the sage grouse use habitat areas up 1.3 - 1.5 miles from lek sites for foraging and other purposes, and females will move around three miles. But sage grouse also have been found to move substantial distances annually, anywhere from 6 miles for non-migratory grouse to 22 miles for migratory grouse. Given that there is high quality habitat in Spring Valley and in close proximity to the project site, it is entirely probable that grouse within those distances use habitat within the project site and within close proximity to the site. Thus, the EA must take into consideration what the impacts will be on the sage grouse outside of the project area as well. In addition, while the EA does state that construction activities, operation and maintenance are likely disturb habitat, it needs to more specifically state that habitat will be lost and fragmented. The EA must state more explicitly how	The EA considers impacts, including those outside of the project area, to sage grouse in Sections 4.3.2.4.1, 4.3.2.4.2, 4.3.3.4.1, and 4.3.3.4.2. Additionally, the Alternative Development Alternative (BLM's selected alternative) includes a 2-mile avoidance area of active leks. Section 4.3.2.4.1 specifically quantifies the acres of lost habitat and discusses habitat fragmentation and quantifies what that would be.
16	27	BR	22	6	The potential impacts to pygmy rabbits are not sufficiently considered or disclosed, especially given that the species is actively being considered for listing under the Endangered Species Act and is a BLM sensitive species. First, the methods used to determine pygmy rabbit presence/absence and activity levels were not sufficient. While we understand that the survey methods are typical for proposed projects on BLM lands, surveys for rabbit pellets and active burrows do not provide a thorough and comprehensive assessment of rabbit use of a particular site for several reasons. First, rabbits may nest outside of the project boundary, but use particular areas within the project boundary for foraging and mating. Second, the rabbit's nocturnal activity patterns suggests that camera surveys are more appropriate for correctly concluding abundance, presence/absence, and activity levels. Moreover, the Draft EA tends to downplay the importance of some areas of the project area to pygmy rabbits based on old pellets and inactive burrows. Given the biology of the species, all areas that have evidence of the rabbit must be considered habitat and in use by the species. To consider otherwise is merely an attempt to downplay the importance of the site to the pygmy rabbit and reduce the total area of potential impact to the species from the proposed project.	Pygmy rabbit surveys were conducted using current protocols from NDOW (2004) and Ulmschneider (2004). These are the accepted protocols for pygmy rabbit surveys which include surveys of the entire site based on habitat. Ulmschneider (2004) states that ideal pygmy rabbit habitat occurs in continuous patches of dense (>30% cover) sagebrush. NDOW (2004) survey protocol indicates that surveys should be done in sagebrush ranging from 3 to 4 feet tall. Soils must be friable and suitable for digging burrows. As stated in the EA, 3,643.2 acres of potential habitat were identified. The EA further quantifies areas with correct habitat features, which includes sign of past use, as high potential, and areas with active systems as occupied. The EA further states that the sensitive nature of the species means that impacts would have an increased intensity over those of general small mammals.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
31	27	BR	28	6	If the project moves forward, it will clearly impact sage brush habitat and numerous sensitive species that occur at the site. Therefore, the BLM must develop a habitat restoration plan and implementation strategy that effectively restores habitat for those species. Because our people use the region for its spiritual, botanical, and wildlife resources, the CTGR must have the opportunity review and comment on such a plan.	A habitat restoration plan is included in the EA in Appendix A and was available for public comment at the same time as the preliminary EA.
15	27	BR	28	6	The EA attempts to soften the impacts on sage grouse habitat by stating that "... post-construction reclamation of short-term disturbance areas... could take an estimated 10 years before... successfully reclaimed." While the CTGR encourages such reclamation, scientific research has repeatedly demonstrated that sage brush habitats do not simply transition to the same habitat following site disturbances. In fact, the successional stages that the habitat goes through often times will either take several decades to transition back to its natural state, or will simply not move back to that prior state. Thus, any ground disturbance to sagebrush habitat will be a long-term disturbance to sage grouse populations, lek activity, reproductive output, etc. Stating otherwise misleads the public on these potential impacts to sage grouse and its habitat, and constitutes an insufficient consideration of impacts.	The EA states that these impacts will be long-term impacts.
28	27	BR	29	9	The BLM is under several directives to protect sage grouse habitat. First, under the directive of BLM Manual 6840.2, projects on BLM-administered lands shall "... implement measures to conserve these species and their habitats, including ESA proposed critical habitat, to promote their conservation and reduce the likelihood and need for such species to be listed pursuant to the ESA." Second, NRS 501 and NAC 503.093 provide state-level protection for special-status species, like the sage grouse. Third, Nevada State policy was established by Governor Jim Gibbons to "...preserve and protect sage-grouse habitat..." While the BLM may not be subject to certain state-level policies, the sage grouse policy devised by Gov. Gibbons clearly identifies that the sage grouse is an iconic species of the Great Basin and important to the citizens of Nevada and the US. Importantly, the region, including the entire project area, is within sage grouse wintering range and rearing/nesting habitat, but the EA fails to fully disclose this and fails to appropriately offer mitigation strategies that protect the grouse. Appropriate mitigation must be identified by the BLM prior to any final decision regarding the SVWE Project. Prior to project	Best available data have been used to evaluate sage grouse use of the area and are described in Section 3.3.4. Detailed analysis of the impacts on sage grouse are described in Sections 4.3.2.4 and 4.3.3.4 using best available data and currently accepted methods. Mitigation measures for sage grouse are described in Chapter 6 of the EA, including those measures listed in the programmatic wind EIS. Additionally, a summary of SNWA's recent sage-grouse telemetry study has been added to Section 3.3.4.
29	27	BR	29	10	The BLM PEIS clearly states that migrating bats around wind energy facilities are at high mortality risk and therefore these energy facilities should not be located in areas known for bat hibernation, breeding, migrating, maternity colonies, or in flight paths between colonies and feeding areas. Moreover, Table 6.1-1 explicitly states that turbines should not be located near those areas. This runs contrary to the proposed SVWEF location, as it is proposed to be 1) located within 4 miles of the Mexican free-tailed bat's Rose Guano Cave; 2) bats are unknown to hibernate at the cave site; 3) this area of Spring Valley is a known migration corridor for several bat species; 4) and it occurs between colony sites and feeding locations. Under direction of the PEIS, this particular wind energy facility's location is poorly selected and must be located in an area subject to substantially fewer impacts. That said, the proposed adaptive management planning and implementation is not appropriate mitigation for this project, despite that adaptive management should be in place no matter where the energy facility is located. The BLM incorrectly uses the proposed adaptive management plan to offset appropriate mitigation.	As described in Table 6.1-1, measures in the ABPP have been prepared to off set the siting of this facility. These measures have been developed in coordination with the USFWS, NDOW, and other wildlife professionals/experts such as Dr. Thomas Kunz and Dr. Michael O'Farrell. Additionally, the BLM's selected alternative does include siting away from high-use areas such as water sites. If mortality is recorded at high levels during migration, or any time, shut-downs and cut-in speed changes are available as described in the ABPP to essentially stop operating during those key times. Therefore, if necessary per the ABPP, operations would not occur during migration, eliminating the need to site a facility away from the area.
20	27	BR	30	10	The Draft EA does not fully consider the potential impacts to the Brazilian free-tailed bat and to all bat species. To correctly estimate impacts on bats, the EA must provide projected fatality estimates based on data from other wind energy facilities. Statistically valid fatality estimates can be conducted using methods from Erickson et al. (2004), where he outlines methods for estimation of the total number of wind-facilities-related fatalities of bats.	The methodology for determining projected mortalities is speculative. Instead of speculating on what actual mortality numbers would occur, Section 4.2.2.7.2 of the Preliminary EA describes the bat mortality threshold based on an assessment of 11 other wind energy projects with the most similar habitats or environmental factors available. The thresholds are listed in Appendix F: Table 3 of the Preliminary EA. The assessment provides an average mortality rate for those facilities so as to not exceed typical impacts from a wind project in similar habitats; and therefore, remain consistent with the Wind PEIS analysis.
17	28	BR	20	10	The Draft EA provides no specific discussion or "hard look" at the potential that wind turbines will "take" - kill, molest, or disturb - bald or golden eagles in violation of the Bald and Golden Eagle Protection Act ("BGEPA"). The EA states that eagles do not nest in the Project area, but notes that they were observed during avian surveys. Draft EA, at 47, 56, 86. Because they are present in Spring Valley, the EA acknowledges that it is likely that the wind turbines will injure or kill eagles that utilize the Valley as foraging habitat. BLM does not address these potential impacts to eagles, whether they will be significant, or whether the project will violate BGEPA. While the EA states that BLM will not issue a notice to proceed until the project proponent completes its obligation under BGEPA, including coordination with the Service and obtaining any required permit, Draft EA, at 35, it goes on to acknowledge that the Service is not currently issuing permits under BGEPA.	The EA states that "injury or mortality of golden and bald eagles is expected to be a rare occurrence at the SVWEF," not that mortality is likely. The potential impacts to eagles are addressed in Section 4.3.2.5.2. The USFWS is not currently issuing take permits for golden eagles, but is able to issue letters of concurrence on Avian and Bat Protection Plans, consistency with their guidance for the BGEPA. The ABPP (Appendix F) now includes golden eagle specific mitigation measures to ensure no net loss of eagles. Additionally, IM No. NV-2010-063, Guidance for the Development of Project-specific Avian and Bat Protection Plans for Renewable Energy Facilities, precludes the issuance of a Notice to Proceed until the USFWS's letter of concurrence for the ABPP is received for the project.

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8	28	BR	21	6	Specifically discussing the threats to sage-grouse from wind energy development, the Service noted that wind projects "have increased in size and number, outpacing development of other renewable sources in the sage-grouse range." Id. At 13950. Currently, there are no published research studies on the specific effects of wind projects on greater sage-grouse. However, the Service anticipates that impacts from "direct habitat losses, habitat fragmentation through roads and powerlines, noise, and increased human presence will generally be similar to those [caused] by nonrenewable energy development." Id. at 13951. Scientists also theorize that noise from turbines and "shadow flicker", which may mimic predator shadows, may cause avoidance behavior. Id. The Service concluded that impacts of wind projects "can reach far beyond the point of origin and contribute cumulatively to other human-made and natural disturbances that fragment and decrease the quality of sage-grouse habitat." Id. at 13952.	The potential impacts to sage grouse have been addressed in Sections 4.3.2.4, and 4.3.3.4. Further, the BLM's selected alternative includes placing turbines at least 2 miles from active leks to address potential behavioral impacts. Habitat compensation has been included in Section 6.4 to address potential loss of habitat, consistent with the PEIS.
9	28	BR	21	9	The SVW Project EA includes a brief discussion of potential impacts to sage-grouse. Data gathered for the Ely Resource Management Plan ("RMP") identify the project area as both summer and winter habitat. Draft EA, at 55. Within one mile of the project area are three existing leks, at least one of which is currently active (the Bastian Creek lek). Id. BLM, however, did not perform sage-grouse surveys of the project area to determine whether and how many birds may use the area for nesting, brood-rearing, or wintering habitat or whether the project area provides habitat connectivity between other habitat areas in southern and northern Spring Valley. See FWS, Wind Turbine Guidelines Advisory Committee Recommendations at 34-35 (Mar. 4, 2010), available at http://www.fws.gov/habitatconservation/windpower/wind_turbineadvisory_committee.html (stressing importance of sage-grouse surveys for wind energy development in sagebrush habitat). Instead, the EA assumes that habitat is limited to 3,643 acres of sagebrush. The Fish and Wildlife Service specifically questioned the lack of sage-grouse surveys in its comments on the December Draft EA. Given the lack of data in the EA, the Service stated that "reaching a conclusion as to the risk presented to greater sage-grouse from this action appears premature." FWS, Comments on the Spring Valley Proposed Wind	The FWS did not provide further comments on a lack of sage grouse data following review of the updated preliminary EA. As stated in the EA, only one lek 2 miles to the northwest of a turbine is active. The area provides low-quality sage grouse habitat and birds were not observed in the area during general use bird surveys. However, additional information regarding local movement patterns based on SNWA-provided telemetry data has been added to the EA.
10	28	BR	22	6	In evaluating impacts to sage-grouse, the EA acknowledges that sage-grouse are likely to avoid the entire project area and adjacent habitat during construction and that some sage-grouse may permanently abandon the area. Draft EA, at 97. Over the long-term, the EA assumes that greater sage-grouse may avoid an area up to two miles surrounding wind turbines. This would equate to a total avoidance area of 38,289 acres, or 9% of available sagebrush habitat in Spring Valley. Under the Proposed Action, wind turbines would be located within two miles of the Bastian Creek lek and could lead to a decrease in the success of the lek or lek abandonment. BLM concludes that the Alternate Development Alternative would reduce impact to the Bastian Creek lek by locating all turbines outside the two-mile lek buffer.	This statement is correct and the conclusion has not changed.
25	28	BR	24	9	The Draft EA does not describe what measures will be implemented if sensitive plant species are found during pre-construction surveys. The Project-Specific Mitigation Measure for Parish phacelia, Draft EA, at 156, should be modified to identify that both pre-construction surveys and appropriate salvage/other mitigation would be completed prior to the start of construction.	The following has been added to the mitigation measure in Section 6.4, "If individual plants are identified, turbines should be microsited outside of the population. If turbines cannot be sited outside of the plant population, plants should be salvaged, as determined appropriate by the BLM's authorized officer."
24	28	BR	27	10	It is unclear if a 1-mile or 2-mile buffer around the project site was assessed for noxious and invasive weeds using the BLM's database. The Restoration and Weed Management Plan text, Appendix A at 6, states a 2-mile buffer and Table 2 indicates a 1-mile buffer as does the Noxious Weeds Risk Assessment in Appendix G.	Per protocol, a 1-mile buffer is required for the weed risk assessment; however, for purposes of the restoration plan, a 2-mile buffer was considered.
23	28	BR	27	10	The Noxious and Invasive Weeds Risk Assessment relies solely on the Ely District weeds database and casual observations. These sources of information do not provide an adequate baseline assessment to measure the potential for, and consequences of, a weed invasion on the project area. The pre-construction weed surveys discussed in the Plan, at 13, should be done prior to the completion of the Risk Assessment for a proper evaluation.	The weed assessment was done using current protocols. Multiple preventative measures were outlined in the assessment to control noxious and invasive weeds. As required, pre-construction weed surveys would be completed.
27	28	BR	28	9	The Restoration and Weed Management Plan describes collection of data on species richness, percent cover density, and frequency, but successful restoration is described only relative to percent cover, Appendix A at 17. Restoration goals for the other criteria should also be provided. Lastly, the process and criteria the BLM would use in agreeing to lower the approved restoration standard should be identified.	Restoration success measurements are based on standard protocols. The following has been added, "If after restoration monitoring, it is determined by the BLM that 80% is not achievable, the percent cover will be lowered based on the BLM resource specialist's best professional judgment." Further detail on processes will be included in the COM plan for the project.
26	28	BR	28	10	Site-specific salvage activities are mentioned in the Restoration and Weed Management Plan, Appendix A at 13, however there is no description of what plants might be salvaged, where they would be stored, when and where they would be transplanted, etc.	The restoration plan discusses salvage of vertical mulch and topsoil. Salvage of general vegetation is not required for this project; however, if Parish phacelia are discovered in pre-construction plant surveys, they potentially could be salvaged if the turbines could not be micro sited out of the plant population.

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15	28	BR	30	6	The sage-grouse cumulative impact analysis is also insufficient to describe cumulative impacts of the SVW Project in combination with other reasonable foreseeable future actions in Spring Valley. The analysis amounts to a single sentence - "[Reasonable Foreseeable Future Actions] would contribute up to 7,062 acres of direct habitat loss and even greater habitat fragmentation for the greater sage-grouse and pygmy rabbit." Draft EA, at 137. The analysis does not discuss the indirect cumulative impacts of construction of these projects, including other wind projects, on sage-grouse throughout Spring Valley, including the total potential avoidance area, the percentage of that area in relation to all available sagebrush habitat in Spring Valley, and the practical implications of permitting these on the species abundance and persistence in the valley.	The cumulative impacts analysis was prepared using the best available data on reasonably foreseeable project. Therefore, not all cumulative impacts can be completely quantified at this time. However, the impacts of this project, if constructed, would be quantified and considered in the cumulative impacts section of any future projects. Cumulative direct and indirect impacts to sage grouse have been described qualitatively in Section 5.2 based on best available data and BLM Handbook requirements.
13	28	BR	30	9	The sage-grouse impact analysis is flawed for at least three reasons. Third, no conservation or mitigation measures are provided in the Draft EA to address the expected sage grouse avoidance or possible permanent abandonment of the SVW Project area and adjacent habitats. As noted in the Draft EA, this would encompass 9% of available sage grouse habitat in Spring Valley. If sage grouse habitat avoidance from wind development is even greater than 2 miles, as described above, the magnitude of impact would further increase.	As part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
14	28	BR	30	9	Given the lack of analysis of winter habitat impacts, questionable effectiveness of a two-mile buffer in protecting active sage-grouse leks from wind development impacts, and lack of mitigation to address avoidance or abandonment of a substantial amount of the currently available sage-grouse habitat, BLM has provided insufficient information to support its conclusion that impacts to sage-grouse will not be significant. SNWA is particularly concerned that BLM has not required compensatory or off-site habitat restoration for impacted sagebrush habitat, as recommended in the Wind Programmatic EIS, and required in the Ely RMP per management action SS-10. BLM justifies this decision based on its assessment that sagebrush habitat is of poor quality and has very low use levels in this area, two assumptions that are unsupported by any survey data in the record. SNWA has collected sage-grouse telemetry data suggesting sage-grouse move across the SVW Project area. Thus, the failure to require compensatory or off-site habitat restoration is inappropriate.	As part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration. An effort must first be made to apply the funds to sagebrush restoration within Spring Valley and then outside of the valley if necessary. Donations into this account are eligible for matching federal funding. All decisions of how to utilize the money will require both NDOW and the BLM approval. Additionally, SNWA's telemetry data have been included in the analysis for sage grouse.
11	28	BR	30	9	The sage-grouse impact analysis is flawed for at least three reasons. First, there is no discussion of the impacts of construction or operations and maintenance on winter habitat or wintering sage-grouse though the area is designated in the Ely RNO sage-grouse winter habitat. Researchers have found that sage-grouse often show fidelity for a small winter concentration area, particularly during harsh winters. Thus, "[i]mpacts to winter habitat may have a disproportionate effect on regional sage-grouse population size and persistence if the species uses a small percentage of available sagebrush habitat in the area." J.M. Becker, et al., Department of Energy, Sage Grouse and Wind Energy: Biology, Habitat, and Potential Effects From Development, at 4.3 (2009), available at http://www.pnl.gov/main/publications/external/technical_reports/PNNL-18567.pdf . In the Draft EA, the BLM does not detail the use of the area as winter habitat, or whether the direct habitat disturbance and disturbances to behavioral activities in adjacent habitat during construction, operation, and maintenance will have disproportionate or significant impacts on wintering sage-grouse. The Proposed Action Resource Conservation Measure which restricts permitted activities from November 1 through May 15 within sage-grouse winter range. Draft EA at 22, does identify if this restriction applies to operation and	Sections 4.3.2.4 and 4.3.2.4 contain analysis on the impacts to grouse habitat as well as behavioral effects. Although within an area designated as winter habitat, the area was delineated at a coarse scale and locally, the habitat is low-quality. The use of the area is described in Section 3.3.4. The EA now defines the conservation measure as permitted "construction" activities.
12	28	BR	30	10	The sage-grouse impact analysis is flawed for at least three reasons. Second, BLM relies on a two-mile buffer to assume potential impact on active sage-grouse leks. As the Fish and Wildlife Service pointed out in its listing decision, there are no existing studies addressing the impacts of wind energy development on sage-grouse and thus, no way to confirm that a two-mile buffer is adequate. Some scientists have called into question the use of two-mile lek buffers. In 2003, the Fish and Wildlife Service recommended a five-mile buffer between wind development and prairie grouse leks. FWS, Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines (May 13, 2003). Recent recommendations from the Service's Wind Turbine Guidelines Advisory Committee confirm that impacts to sage-grouse from energy development are even greater than impacts to prairie grouse and research shows that development within three to five miles of active leks may have significant adverse impacts. FWS, Wind Turbine Guidelines Advisory Committee Recommendations. The divergence of authorities on sage-grouse lek buffers for wind development demonstrate that the impacts of the SVW Project, even if a two-mile buffer is imposed, are highly uncertain and controversial, indicating that an EIS is necessary to evaluate potentially significant impacts to the sage-grouse. This is particularly true given that the	An EIS would not analyze significant impacts any more than this EA. Additionally, this EA is tiered to the BLM's Wind PEIS, consistent with the BLM Handbook and IM 2009-043. The buffer on sage grouse leks is one measure to help reduce impacts, but additional measures are included in Chapter 6. Additionally, habitat compensation has been included in Section 6.4. It is also speculative to say that the project will likely cause abandonment of the Bastian Creek Lek. The turbines were placed based on the available GIS and micro-siting may be completed to address this issues as determined necessary in the field by the on-site environmental monitor and the BLM's authorized officer.
4	29	BR	3	6	It is critical that in evaluating the potential impact of projects on federal land, full surveys for plants and animals be done, normally in various seasons as different plant species are only present a few months a year.	All necessary surveys have been completed as described in the affected environment sections for each resource. Additionally, several follow up surveys have been identified in the mitigation measures and resource plans (see EA appendices) that would be completed prior to, during, and/or after construction.

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18	29	BR	19	6	The Draft Avian and Bat Mitigation and Adaptive Management Plan states: "During this study, turbine cut-in speeds will be altered from sunset to 4 hours after sunset for a 62-day period (248 hours) during the highest use period of August 1 through September 31." There are 12 other species of bats that could potentially be impacted by this project from May to the beginning of August. An adaptive management plan should be created for the additional species at risk as well.	The cut-in speed study from August 1 to September 30 is a starting point for mitigation correlating with the highest use period documented in pre-construction bat and radar surveys. The ABPP provides for additional cut-in speed changes and shut-downs at any time of the year in a phased approach to address impacts to both bats and birds.
19	29	BR	19	10	The EA states: "The project proponent will provide \$10,000 per year for three years to fund wind/wildlife interaction studies. Research will be recommended by the TAC, approved by the BLM Authorized Officer, and funded by the proponent. Additionally, the BLM or other participating agency may elect to contribute funding. In that event, the proponent would provide funding to the BLM, and the BLM would issue a Request for Proposals for the study." Studies are not mitigation for wildlife loss in any situation. More specifically, a \$30,000 research fund will not bring back the Rose Guano Cave population of Mexican free-tailed bats if the wind farm causes a giant population crash. This is not an acceptable mitigation plan.	The \$10,000 per year is intended to add to research to help provide a net overall benefit. However, it is not intended to mitigate all impacts to bats or birds. There are many initial mitigation measures as well as adaptive measures that have been developed and described in the ABPP to manage possible mortality levels below significant levels.
16	29	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan in no way convinces us that bat mortality can be avoided. It is frivolous for the BLM to consider approving a Right of Way for a project that is so close to the Rose Guano Cave and in a region that has such a robust population of different species of raptors.	The Avian and Bat Protection Plan was developed to address the potential issues to both birds and bats. Professionals/experts in wind/wildlife interactions, such as Dr. Thomas Kunz, an internationally renowned bat researcher, and local agencies were involved to ensure that all necessary measures were utilized and were realistic.
15	29	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan fails to document four species that would occur in the region. These species are: California myotis (<i>Myotis californicus</i>), Fringed myotis (<i>Myotis thysanodes</i>), Western Pipistrell (<i>Pipistrellus hesperus</i>), Hoary Bat (<i>Lasiurus cinereus</i>). The hoary bat is mentioned in the EA, but the EA neglects to mention that the Hoary bat is a BLM Species of Special Concern. An EIS will need to provide a complete list of bat species that would occur in the area as well as discern presence and activity levels across the 8,500 acres. In April, 2010, BLM employees informed some of our members that this new mitigation and adaptive management plan "would resolve issues associated with bats." We believe that this was a premature statement.	The plan lists bats identified during two years of acoustic and capture surveys in the project area. Hoary bat is included in plan. Hoary bat is not a BLM species of concern. The Avian and Bat Protection Plan was developed to address the potential issues to both birds and bats. Professionals/experts in wind/wildlife interactions, such as Dr. Thomas Kunz, and local agencies were involved to ensure that all necessary measures were utilized and were realistic.
2	29	BR	19	10	In light of the known impacts of wind turbines to birds and bats alone, siting decisions must be crafted to minimize these impacts rather than exacerbate stresses on raptors and passerines. Understanding of species presence and migratory corridors is an essential component of such an evaluation.	Two years of studies for birds and bats were completed, as well as radar studies by Dr. Sherwin. These studies have illustrated an understanding of species presence and migratory corridors. The alternative development alternative (BLM's selected alternative) includes siting away from high use areas such as water sources, agricultural fields, and raptor nests. The current positioning of the project area was a consideration of where wind resources are tempered by the weight of other resource issues.
17	29	BR	19	10	The Draft Avian and Bat Mitigation and Adaptive Management Plan states: "A curtailment study will be completed during the first year to determine the most effective cut-in speed following methods based on those developed by Arnett et al. (2009) in which they evaluated the effectiveness of increasing cut-in speeds from an initial 4.0 m per second to experimental speeds of 5.0 and 6.5 m/s. These increased cut-in speeds were effective in reducing bat mortality by 53%-87%, with minimal loss of revenue for the WEF (Arnett et al. 2009). No Brazilian free-tailed bats were evaluated in this study; therefore, testing is needed to determine the effectiveness of increased cut-in speed." Because "No Brazilian free-tailed bats were evaluated in the study", you have very little information as to what the future outcome will be.	Given that cut-in speed changes have been successful for other bat species, it is highly likely they will be effective for this species as well. However, the ABPP is an adaptive management plan in which increasing cut-in speeds is just one tool that may be used. The plan was written to evaluate impacts and provide tools and techniques to address those impacts as they occur.
24	29	BR	20	6	Bald and Golden Eagles are common on the project site. Spring Valley is known as a wintering region for bald eagles. How will death of bald eagles be waived under the Bald and Golden Eagle Protection Act? A Section 7 take based on research could not be justified in this case. How many Take permits would be issued for bald eagles? Additionally, the presence of WTGs would increase the risk of nest abandonment in and near the project area. How is this being allowed under the Bald and Golden Eagle Protection Act?	Based on two years of pre-construction data and as disclosed in Section 3.3.5 of the EA, golden eagles were only observed 13 times and bald eagles were only observed once during surveys, with several other incidental observations outside of survey periods. No bald or golden eagle nests or nesting habitat has been recorded within or adjacent to the project area. If avian mortality occurs, enforcement of the MBTA and the Eagle Act are the responsibility of the USFWS. No permits for take of eagles are currently proposed. The ABPP outlines measures to reduce risk to avian species. Additionally, IM No. NV-2010-063, Guidance for the Development of Project-specific Avian and Bat Protection Plans for Renewable Energy Facilities, precludes the issuance of a Notice to Proceed until the USFWS's letter of concurrence for the ABPP is received for the project.
23	29	BR	20	6	We do not believe that the BLM nor the applicant has proven that their project will not remove a significant amount of avian wildlife from the region including raptors, including protected eagles; and passerines, smaller migratory birds many of which are in decline throughout the Americas. Large raptors are the birds that suffer the highest mortality.	Large birds actually make up a small percentage of the overall avian mortality across all wind farms, with several projects contributing an disproportionate amount of the raptor fatalities. In this case, a comprehensive ABPP (Appendix F) has been prepared to address potential mortality and ensure significant losses do not occur.
3	29	BR	20	6	In light of the known impacts of wind turbines to birds and bats alone, siting decisions must be crafted to minimize these impacts rather than exacerbate stresses on raptors and passerines. Understanding of species presence and migratory corridors is an essential component of such an evaluation.	Two years of studies for birds and bats were completed, as well as radar studies by Dr. Sherwin. These studies have illustrated an understanding of species presence and migratory corridors. The alternative development alternative (BLM's selected alternative) includes siting away from high use areas such as water sources, agricultural fields, and raptor nests. The current positioning of the project area was a consideration of where wind resources are tempered by the weight of other resource issues.

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25	29	BR	20	7	As of January 2008 San Geronio wind farm near Palm Springs, California consists of 3,218 turbines. Raptors and waterbirds are killed here, but a study by McCrary (1986) evidenced that passerines were also being killed in numbers: "an overall estimate of as many as 6,800 birds killed per year, most of them nocturnal passerine migrants."	The San Geronio Wind Farm is an old facility using old technology and closely spaced turbines, with 3,218 turbines providing 615 MW. Spring Valley would contain 75 turbines generating 149 MW; more than 10 times fewer turbines to generate similar power production. It also occurs in a very different area ecologically. Therefore, these facilities cannot be accurately compared. Potential impacts to all birds, including passerines, are described in the EA in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 using the best available data and currently accepted methods.
27	29	BR	21	6	The project will disturb sage grouse habitat. Sage grouse need large undisturbed areas of sagebrush, not cut by roads or fences, to nest and feed in. The impacts of industrial wind farms in sage grouse habitat will involve further fragmentation of the large patches of pristine sagebrush that harbor these birds. There are about 3,643 acres of sage grouse habitat within the project site. The major threat to Greater Sage-Grouse is the continued degradation and destruction of sagebrush habitats across the West. Agriculture has completely eliminated millions of hectares of native shrub-steppe have been stripped of their sagebrush vegetation. Overgrazing and urban development also contribute to the degradation of shrub-steppe habitat.	As described in the EA, the habitat in this area is of low quality and is already severely disturbed and surrounded by transmission lines and roads. The impact of removal of this habitat is fully described in the EA and appropriate mitigation is included in Chapter 6.
28	29	BR	21	9	From the Programmatic Wind EIS: "Avoid, when possible, siting energy developments in breeding habitats. Potential breeding habitat occurs in the project area at low frequencies; however, the project is 2 miles from the closest lek and individuals likely use habitat west of SR 893 and the nearby overhead transmission line, thereby avoiding physical barriers. This is not mitigation, nor avoidance. Off-site mitigation should be considered, such as retiring a grazing allotment in Sage grouse habitat. Fragmentation will greatly increase, and is not mitigated." This has not been followed.	As part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
29	29	BR	22	6	Biologists mapped two burrows of pygmy rabbit (<i>Brachylagus idahoensis</i>) in the northern part (SWCA 2009). These small herbivores require tall dense sagebrush stands to hide from predatory hawks and eagles. At least 3 individuals were seen in 3 separate habitat patches in the project site. About 89 acres of good habitat for this rabbit, and 61 acres of occupied habitat with active burrows were found on the project area. The EA states that it hoped that the Pygmy rabbits will move away, "to avoid mortality associated with daily operations such as crushing by vehicles" Because pygmy rabbits are restricted to sagebrush habitats with deep soils, they have always been rare and patchily distributed across their range. Biologists agree that the main threats to pygmy rabbits across their range are habitats loss and fragmentation caused by conversion of sagebrush rangeland to agriculture, development, including oil and gas production, and wildlife frequency in some areas. If the Proposed Action is selected, relocation of pygmy rabbits by live trapping prior to construction should be considered in consultation with the USFWS and NDOW to avoid direct mortality. This is unacceptable, as the public does not have a chance to review any Pygmy rabbit relocation plan after project approval. How does trapping impact the rabbit? Please reference nest trapping studies and give mortality numbers. How will rabbits be prevented from	That mitigation measure is included in Section 6.4.
30	29	BR	23	6	The wind farm will likely also cause impacts to resident elk, deer, and pronghorn antelope, by noise impacts, habitat fragmentation, and increase human presence. The project will disrupt connectivity for wintering elk and pronghorn antelope. Turbines would be bisected by roads, concrete, electric cables and other disturbances. Wildlife in general would be blocked by the proposed project. Analysis of a seasonal use by these animals and measures to minimize impacts should be included in a full DEIS.	This EA is tiered to the BLM's Programmatic EIS, consistent with the BLM's NEPA handbook and IM 2009-043 on implementing the Wind PEIS. The project area will not be blocked off and wildlife in general will be allowed to move freely through the project area. All impacts to big game, including the mentioned species, are described in Sections 4.2.2.3 and 4.2.3.3 using the best available data and currently accepted methods.
31	29	BR	24	6	No surveys for rare plants were undertaken on the site, only a few casual observations. Parish's phacelia (<i>Phacelia parishii</i>) has the potential to be found on the site, as records of it are found 250 feet from the project boundary. It is found on clay and alkaline soils by the playas and springs. Shadecale spring parsley (<i>Cymopterus basalticus</i>) is state ranked as "critically imperiled." Broad-pod freckled milkvetch (<i>Astragalus lentiginosus v. latus</i>) is state ranked as "imperiled due to rarity or other demonstratable factors." Presence or absence of these and other plants must be detailed in surveys.	Data from NNHP shows Parish phacelia over 4 miles from the current project area. Mitigation for this species, which includes pre-construction surveys, is included in Section 6.4. Two populations of <i>Astragalus lentiginosus v. latus</i> occur approximately 2.5 and 7.0 miles from the project area; however, this species does not have habitat within the project area.
8	29	BR	26	6	An EIS should also examine the impacts geo-testing would have on soils and burrowing animals. How many decibels will they entail? Would burrowing animals' hearing be harmed?	The BLM's Wind PEIS that this EA is tiered to analyzes those issues. Geo-testing is part of the proposed action and is therefore considered in the analysis for the EA. This EA considers burrowing animals and the impacts from noise in Sections 4.2.2.1, 4.2.2.2, 4.2.3.1, and 4.2.3.2 using best available data and currently acceptable methods.
14	29	BR	29	10	The Avian and Bat Mitigation and Adaptive Management Plan is only in Draft Form. Where is the final document? The several unresolved issues in the document indicate that BLM is negligent in completing these studies.	The final ABPP is included in this final EA. All required studies have been completed.
26	29	BR	30	6	The Spring Valley Wind Project EA is not following the recommendations of the PEIS; these issues must be addressed in a more detailed EIS complete with adequate bird and bat surveys.	All analysis presented in the EA is based on the best available data and is consistent with the BLM NEPA Handbook, the BLM Wind PEIS, and other currently accepted methods. An EIS does not dictate the level of surveys or mitigation necessary to reduce impacts. The EA utilized proven methods as well as additional experimental methods developed by professionals in wind/wildlife interactions to manage possible impacts below significant levels.

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13	29	BR	30	6	The project is approximately 4 miles from Rose Guano Bat Cave. The Programmatic EIS for wind states that caves used by bats should be avoided. In place of this measure, a project-specific Mitigation Measure has been provided in Section 6.4.2 and in the ABPP. The mitigation measure, to avoid known bat caves and migration corridor, is completely being ignored. There appears to be no mitigation.	The project is proposed 4 miles from Rose Guano Bat Cave and was not placed along the ridgelines closer to the cave. The referenced measure to avoid bat hibernacula and migratory routes is disclosed in the EA and it is addressed by presenting a comprehensive bat protection plan (Appendix F) to address the proximity to the cave and migration area, which includes changing the cut-in speed of the turbines as well as turbine shut down during high-use times of the year.
21	29	BR	30	6	The Mortality Threshold fails to explain the reasons that the numbers listed are acceptable thresholds for mortality of species. A final EIS will need to justify these numbers from an ecological perspective.	The thresholds were determined through coordination between the BLM, NDOW, USFWS, and other wildlife professionals/experts. Additionally, the ABPP states that these numbers may be changed based on post-construction monitoring data.
22	29	BR	30	6	All of the mitigation phases are "after the fact". You have not convinced us that any of these mitigation phases will be adequate enough to prevent the mortality.	Both pre-construction and post-construction measures are listed in Chapters 2 and 6 of the EA and the ABPP. Measures included are based on current methods with data that supports their validity. For example, cut-in speed changes have been shown to reduce mortality between 53% and 87%.
20	29	BR	30	6	The EA states: "Carcass removal trials will be completed seasonally as described above in Section 6.2. Different seasonal rates for carcass removal are necessary to address changes in the scavenging throughout the season, as well as over time, as scavengers adapt to a novel food source. Carcasses will be placed as described for searcher efficiency trials. Carcasses will be checked at 1, 2, 3, 4, 5, 6, 7, 14, 21, and 28 days following placement, or until they are all removed. Separate carcass removal rates will be determined for bats, small birds (passerines), and large birds (raptors). Carcasses used for removal trials will be handled with disposable nitrile gloves or an inverted plastic bag to avoid leaving a scent on the carcasses and interfering with the scavenger removal trial (Arnett et al., 2009)." This is still in the trial phase. More studies should be conducted before the project is constructed, not after. This data should be included and evaluated in an EIS.	These trials are a necessary part of post-construction monitoring described in the ABPP in order to estimate the actual mortality occurring, not to predict potential mortality. Data from carcass removal trials are not necessary to support additional analysis in the EA.
12	30	BR	20	9	Projects proposed by Federal agencies need to show that they maintain or enhance breeding populations of eagles prior to any permit issuance. Eagle take associated with wind farms has become an issue of national significance due to the quantity of proposed projects. The issue has become cumulative on a national scale.	The ABPP (Appendix F) now includes golden eagle specific mitigation measures to manage for no net loss of eagles.
14	30	BR	20	10	Migratory Bird Treaty Act of 1998, has a permitting clause for the relocation of migratory birds and not an incidental take permit clause. While violations are seldom enforced by the Solicitors office, Federal agencies should do all that is possible to implement and comply with the Act and avoid, mitigate or minimize impacts and seek to design projects that are neutral or beneficial to migratory birds. Migratory bird take associated with wind farms has become an issue of national significance due to the quantity of proposed projects. The issue has become cumulative on a national scale.	A comprehensive ABPP (Appendix F) has been prepared to address potential take of migratory birds. The EA and ABPP use BMPs and mitigation measures to minimize take under the Migratory Bird Treaty Act.
13	30	BR	21	10	Sage grouse were found warranted, but precluded, from listing under the Endangered Species Act in a 2010 DOI decision. Continued species loss and habitat degradation are of great concern due to the warranted for listing finding. The impacts associated with wind farms to sage grouse and their habitat has become an issue of national significance. The issue has become cumulative on a national scale.	Sage grouse are described in Section 3.3.4 and potential impacts are described in Sections 4.3.2.4 and 4.3.3.4 using the best available data and currently accepted methods. Cumulative impacts to sage grouse are described in Section 5.2.
10	30	BR	29	10	While the Avian and Bat Protection Plan appears consistent with the Golden Eagle National Environmental Policy Act and Avian Protection Plan Guidance for Renewable Energy guidance Instruction Memorandum No. 2010 there appears to be numerous contradictions between the body of the EA and the plan. It may have been beneficial to have involved the National Park Service in the development of this document. The birds and bats that use Spring Valley are not limited by political boundaries and utilize lands administered by both GRBA and the BLM for parts of their life histories.	No contradictions between the EA and the plan have been found or were specified in the comment which could be addressed. The BLM met with the NPS on March 23, 2010, at which time there was an opportunity to provide input into the avian and bat plan or ask to participate in further development of the plan.
11	30	BR	30	9	Per the Avian and Bat Protection Plan, the EA appears to disclose that the project will allow 203 direct fatalities of birds (including 2 bald eagles and 2 golden eagles) and up to 192 bats (including state listed species) per year, before any mitigation measures would be implemented. Assuming a 30 year life for the project, the EA should disclose to the public that thousands of birds and bats will be lost from a unit of the National Park system. The park believes that this level of mortality, over the life of the project, constitutes a significant direct impact to wildlife resources that utilize both GRBA as well as Spring Valley. When looking at the other projects as listed above and the high potential for habitat degradation from the SNWA project, there is an obvious potential to significantly impact shared DOI bat and bird populations in the area. The BLM needs to disclose to the public the cumulative impacts to the shared DOI wildlife resources and specifically impacts to wildlife resources on land administered by the National Park Service.	On a large scale, thousands of birds and bats over 30 years is an acceptable loss consistent with current levels as described in the PEIS. It should be noted that thresholds for eagles have been reduced to 1, based on current USFWS status. Also, mitigation and conservation measures will be implemented during construction and operation without any mortality. Additional phased mitigation would be implemented if thresholds are reached. The thresholds were determined through coordination between the BLM, NDOW, USFWS, and other wildlife professionals/experts. Additionally, the ABPP states that these numbers may be changed based on post-construction monitoring data.

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9	32	BR	20	9	Section 7.3, Table 5: Due to the Service's concern surrounding eagles and the recent rules pertaining to take of eagles under the BGEPA, we recommend that the mortality threshold for bald and golden eagles be changed to one eagle instead of two. We are unclear as to the extent of development of any above ground transmission lines. If there will be additional above ground poles and lines installed, these sites should be described and included in the ABPP and facilities should be constructed to Avian Power line Interaction Committee (APLIC 2005) standards to reduce the likelihood of collision and electrocution.	The multiplication factor for these species has been changed to 1 due to their status under the BGEPA, which in turn reduced their mortality threshold to 1. The EA includes a description of the necessary transmission in Section 2.1.1.2.7, which now describes the length of the line and the number of poles. Also, the following has been added to Section 2.1.4.3 of the EA: "All new above ground poles and transmission lines installed will be constructed to Avian Power line Interaction Committee (APLIC 2005) standards to reduce the likelihood of collision and electrocution."
1	32	BR	20	9	On September 11, 2009 (74 FR 43686), the Service set in place rules establishing two new permit types, 1) authorizes take of bald and golden eagles that is associated with, but not the purpose of, the activity; and 2) authorizes purposeful take of eagle nests that pose a threat to human or eagle safety. However, based on best available information, the Service currently has concerns over golden eagle populations. Therefore, until such time that we have additional data show that populations can withstand additional take, of those authorized under the new rule, we will only consider issuance of permits for safety emergencies and other actions that will result in a net reduction in take or a net take of zero for golden eagles. Meaning, that unless it can be demonstrated that take can be offset by avoidance, minimization, or mitigation measures, ultimately resulting in no net loss to the population, a permit will not be issued.	The USFWS does not plan to issue a permit at this time. However, the ABPP (Appendix F) now includes golden eagle specific mitigation measures to ensure no net loss of eagles. The BLM must have a letter of concurrence from the USFWS that the ABPP is acceptable before they can issue notice to proceed.
2	32	BR	20	9	Section 2.1.4.3, Resource Conservation Measures: The EA states that prior to the onset of the raptor breeding season, raptor nest surveys will be performed to identify active nests within 0.5 mile of a turbine. The Service would appreciate additional clarification on this Conservation Measure, namely if the start date on this activity is sufficiently early to capture all species and additionally once searches commence how frequently will they be performed to ensure species or individuals that may nest later in the season are not overlooked. We suggest contacting the Great Basin Bird Observatory or other regional experts in the NDOW to delineate the specific dates associated with this Conservation Measure. Further, based on the species known to nest in proximity to this project, we recommend nest searches be extended to 1 mile of the project boundary, but up to 10 miles for golden eagles.	The ABPP and EA now state, "Nest surveys will be conducted prior to the nesting season (approximately March 15 to July 30) and once each month during the nesting season during the first three years and every fifth year after that. Aerial or ground based raptor nest surveys will be conducted within the entire project area and a 1-mile buffer for raptors (BLM 2007), except for bald and golden eagles. Bald and golden eagle search distances will be determined through consultation with the USFWS 10 miles from the project area based on current USFWS guidance. The complete 10-mile search area will be limited to once at the beginning of the golden eagle nesting season with monthly follow-up surveys only being completed for identified golden eagle or potential golden eagle nests. If aerial nest surveys are conducted, ground-based follow-up surveys will be conducted for all active nests identified. Ground-based passerine nest surveys will be conducted within the project area and a 0.5-mile buffer from all turbines." Nest searches have been adjusted per your recommendation.
3	32	BR	20	9	Section 3.2.6, Birds of Prey and Vultures: With respect to nesting golden eagles, you reference Floyd et al. (2007), when stating the closest known breeding pair occurs 10 to 15 miles away. We are not clear how this measurement was derived from this source. Further, we suggest contacting the NDOW for data pertaining to known golden eagle nest sites in vicinity of this project. Our inquiries into this data revealed there are at least 4 nest sites within 13 miles of the project boundary, at approximately 4, 8, 12.5, and 13 miles, and likely representing three territories. It is not known if these sites are currently active or if they represent the complete extent of nest sites.	This section has been updated with nest data from NDOW. The section now states, Nesting raptor data provided by Nevada Department of Wildlife (NDOW) shows one known nest approximately 4 miles from the project area and another 8 miles away. However, these nests have not been checked for activity in almost 30 years. During surveys for the Atlas of the Breeding Birds of Nevada from 1997-2000, Floyd et al. (2007) found the closest breeding pair of golden eagles in the Schell Creek Range, northwest of the project area. This nest appears to be more than 10 miles away from the project area, but the exact location is unknown.
4	32	BR	20	9	Section 3.3.5, Birds of Prey and Vultures: This section describes golden eagle occurrence within the project area during several different survey efforts. In reviewing the Spring Valley Wind Power Generation Facility Final Preconstruction Survey Results Report (SWCA 2009), there appears to be an additional dataset (General Use Surveys, Section 2.2.3) that captured winter use. This dataset may be informative and the Service would appreciate viewing these results. Further, we are aware that the NDOW performs winter raptor surveys in the Spring Valley and this data may better inform our concern surrounding the eagle resource in the area. We suggest that this data be incorporated in to the final document.	The winter data for all species are summarized in the SWCA 2009 report for general use surveys. Additionally, following submittal of this comment, SWCA provided the USFWS with a summary of golden eagle data, including winter data. Lastly, NDOW nest data were used to better describe golden eagle use in the area. NDOW raptor survey is not currently available.
5	32	BR	20	9	Section 6.3, Ely RMP/FEIS-Adopted Mitigation Measures: Table 6.1-1 identifies mitigation measures that will be adopted as part of this proposed action. Under the subheading 5.9 Ecological Resources-Gallinaceous Birds it states that the mitigation measure pertaining to compensatory habitat restoration for impacted sagebrush habitat is not applicable due to poor quality of habitat and very low use. We do believe the rationale for this waiver has been sufficiently described and submit that this mitigation measure should be incorporated.	As part of the proposed project, the project proponent has volunteered to donate \$500,000 to enhance sagebrush habitat that supports species such as the greater sage-grouse. Funds would be deposited into NDOW's Non-Executive Account and marked specifically for purposes of sagebrush restoration efforts, which could include permitting, equipment and seed purchase, labor, and other necessities for restoration.
13	32	BR	30	6	We consider the approach described in the ABPP to be progressive and represents substantial creative effort on the part of numerous people and entities. While this approach has considerable merit, ultimately, we should strive to mitigate the total impact incurred by the project and we will truly not know this until after construction. Our questions is how to handle this uncertainty. We suggest that additional thought be given to worst case scenarios and that this "catastrophe clause" be incorporated into the ABPP. While we do not offer suggestions as to its form and content we would gladly discuss the terms of this clause as we go forward to finalize this agreement.	The ABPP has been written to be adaptive and address the "unknown" impacts as well as those that are most possible. The following statement is in the last paragraph of Section 7.1 to address this concern: "If thresholds are still exceeded following implementation of all mitigation measures for all phases, the BLM would meet with the TAC, other appropriate land and wildlife management agency representatives, and the proponent to determine necessary management strategies. "

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10	32	BR	30	7	Section 7.4.1 - 7.4.5, Turbine Curtailment: We are assuming that the number of hours delineated under this mitigation measure is tied to the cut-in speed experiment identified in Section 5.2. Meaning that if no statistical difference in cut-in speed is detected during the experiment and 3.0 m/s is adopted this mitigation measure is moot. Alternatively, if it is shown that a 5.0 m/s cut-in speed significantly reduces mortality and is adopted for the duration of the project, this cut-in speed will be implemented for the 62 day "highest use" or "peak activity" period identified in Section 5.2 and the mitigation measure identified in this section will be in addition to the 62 day period. We would appreciate validation of this inquiry.	This is correct regarding implementation of cut-in speed based on experimental findings and that phased mitigation is in addition to the initial 62-day period.
8	32	BR	30	9	Section 6.5, Nest Surveys: The banding research proposed in this section may have some interesting merit. For example, this type of mark-recapture study could investigate potential changes in local populations due to construction. As proposed, however, it does not appear to have been fully developed. It would be best to simply make assumptions as to residency of individuals based on time of year and species. To validate the season and species assumptions, would require a substantially large number of banded individuals and several years worth of data before conclusions could be drawn as to which group of individuals are impacted most and why.	This section has been removed from the ABPP.
11	32	BR	30	9	Section 7.4.1 - 7.4.5, Direct Mitigation: The Service suggests an additional potential direct mitigation measure may be to retrofit existing power poles in the area, to APLIC standards, to prevent or reduce potential mortality through collision or electrocution, upon owner approval. The extent of this mitigation could be adjusted, depending on the mitigation phase, and the specific starting point or increments could be discussed and would likely depend on the cost and expected efficacy associated with this activity.	This measure has been added to the ABPP as an initial mitigation, to the extent that owners will allow it.
12	32	BR	30	9	Section 7.4.1 - 7.4.5, Indirect Mitigation: The Service has currently adopted a position, based on the best available information, of "no net loss" to regional golden eagle populations. Given specific methods for mitigating mortality to eagles have not been established and proven, we submit that monetary compensation (in various forms such as offsite habitat restoration, outreach, wildlife rehabilitee support, power line retrofit) may be the only effective way of offsetting mortality caused on site. This being the case, and based on golden eagle ecology (long lived, wide ranging, low reproducing), we suggest that the allocated monetary amounts delineated in the phased indirect mitigation sections (7.4.1 - 7.4.5) may be insufficient to offset impacts and recommend that a method for defining these amounts be established through coordination with the Service's Migratory Birds Division prior to adopting these figures. We suggest that part of this discussion may be informed by a Habitat Equivalency Analysis, a process that the Service recommends as part of an ABPP.	A section on golden eagle-specific mitigation measures, including completion of a HEA and monetary donations, has been included in Section 7.3.1 of the ABPP.
6	32	BR	30	10	Section 5.2, Turbine Curtailment: The Service would recommend consulting a statistician with respect to the details associated with the curtailment experimental study design. We have resources that can be extended to this effort or at least be used to review a proposed experimental design. Specifically, I would ensure that the number of turbines used in the experimental design be sufficiently large. The number of turbines necessary depends on several unknowns such as the number of mortalities that occur and the variation in these mortalities due to other confounding factors. This being the case it may be necessary to repeat this experiment appears critical and ripe for criticism as it will inform the operations of the facility for the duration of the project. I would strongly recommend that it be performed by a third party researcher with the commitment to publish the results in a peer reviewed arena.	The current design was based on Dr. Thomas Kunz's review of the original curtailment design and recommendation to increase the number of turbines surveyed for more statistical power. Further, as stated in the EA, data analysis will be done using the most currently accepted statistical methods. Additionally, as a TAC member, the USFWS may review methods and recommend changes throughout the process. Lastly, it is the intention of the proponent to have a researcher publish data from these studies.
7	32	BR	30	10	Section 6.1, Mortality Surveys: How often mortality searches will be preformed will ideally be informed by the carcass removal trials. In the absence of this data or if this data is not sufficient to inform this decision, we recommend that mortality surveys be performed on a weekly basis instead of the every other week basis identified.	The last sentence of Section 6.1 states, "survey intervals may need to be adjusted based on the findings for these studies [mortality and scavenger rate] in order to ensure precise correction factors, as described by Huso (2008)." This statement addresses the potential need to increase survey frequency.
1	35	BR	19	10	The EA, not surprisingly, overlooked information on this species [Hoary bat]. The below info comes from the California Desert Renewable Energy Conservation Plan. Even though the deadline passed, BLM should not be excluding information that someone may be following up on in a potentially more official capacity. Hoary bat (<i>Lasiurus cinereus</i>). Although this species is widely distributed and unlikely to be listed as threatened or endangered in the near future, hoary bats are the most frequently killed species at wind energy development in North America (Arnett et al. 2008) and have been recorded as fatalities at wind energy facilities within the DRECP (Chatfield et al. 2009). Given the cumulative impacts of massive expansion of utility-scale wind energy development in the United States, combined with low reproductive rates of bats, there is some potential for hoary bats to be added to one or more special status lists within the next 30-50 years.	Section 3.2.8 states that hoary bats are one of the most documented bat mortalities at wind farms in the United States. The potential impacts to hoary bats are described in Section 4.2.2.7.2. Hoary bats are also discussed in the ABPP in Section 2.2. Both of these include references to Arnett et al. 2008.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
21	14	CR	4	9	In 2006, Highway 50 in White Pine County, Nevada and Millard County, Utah was designated by Congress as the Great Basin National Heritage Route. The larger area of these counties and Native American Tribal lands is recognized as the Great Basin National Heritage Area. The Great Basin National Heritage Area is a geographical region encompassing White Pine County, Nevada and Millard County, Utah and adjacent Indian reservations that contain nationally significant archaeological, historical, cultural, natural and scenic features that are emblematic of the entire Great Basin Area.	A description of the Great Basin National Heritage Route has been added to Section 3.6 of the Final EA.
10	16	CR	32	9	The FONSI downplays the context of this project by stating that it is in a sparsely inhabited area and that the primary economic activities are ranching and mining. It neglects to recognize that Spring Valley is a culturally significant area for regional tribes of Native Americans, and that the proposed project borders and may encompass a site where Native Americans were massacred by the U.S. Army during the Goshute "War".	The context section of the FONSI has been revised to describe the proposed project's proximity to the Swamp Cedar ACECs and the cultural resources present.
19	16	CR	32	10	In addition, the Goshute and other native tribes indigenous to the region view the area as culturally and religiously significant and are submitted their own comments and ethnographic study to support their belief.	As of 9/24/2010 the BLM had not received any ethnographic studies from Native American Tribes regarding this project. All comments submitted by Native American Tribes will be addressed though continuing consultation with the BLM.
14	17	CR	4	6	There will be 28.7 miles of new roads constructed within the project area. These roads will provide access to the cultural resources that are located in the area. This constitutes an effect under the National Historic Preservation Act that cannot be mitigated by avoidance. The cultural resource plan addresses only those effects during construction, operation and maintenance by the facilities crew themselves.	Section 4.6.1.1 of the Preliminary EA summarizes the Wind PEIS and states: "Other indirect impacts include increased access to the area, which could result in looting, vandalism, and inadvertent destruction of cultural resources."
3	19	CR	32	10	All possible measures must be taken to ensure that sacred burial grounds of local Native American Tribes are not affected before the project is allowed to move forward. While the current study mentions outreach to a number of tribes, it does not include the comments received as a result of that outreach, and mentions that meetings with some of the Tribes were still pending. This issue should be completely reviewed and resolved before construction begins.	The BLM is requiring a cultural resource monitor during all ground-disturbing activities. Appendix E : Cultural Resources Monitoring and Discovery Plan of the Preliminary EA outlines to the procedures that will be required to protect all cultural resources that are discovered and ensure compliance with all applicable laws. The BLM respects the concerns of the tribes regarding the final resting place of their ancestors and will take all reasonable safeguards to protect the graves. The BLM will attend or arrange any meeting regarding this project requested by the tribes.
18	27	CR	4	9	Moreover, these caves and their associated species are important cultural resources to our people, and any disturbances to those is of serious concern for the CTGR.	Sections 4.6 and 4.7 of the Final EA have been revised to include a description of the resources present, the types of inventories conducted, and the Tribal Consultation completed without breaking confidentiality in order to better describe the potential direct, indirect, and cumulative impacts to those resources, including the Rose Guano Cave.
3	27	CR	4	9	The CTGR is concerned that the SVWE Draft EA does not carefully and comprehensively describe potential impacts to cultural resources. Under Section 3.6 and 3.7 of the Draft EA, the CTGR suggests that the BLM list and describe each of the cultural resources similar to what has been drafted under Sections 3.2 and 3.3. The CTGR is not recommending that cultural sites and features have their associated potential adverse impacts appropriately delineated, while maintaining the confidentiality of those resources as directed by Executive Order 13007. The Class III cultural resource inventory and ethnographic investigations (see Lahren et al. 2009 report) identify that at least ten cultural sites within close proximity to the SVWEF (and certainly within the 11-mile radius delineated for the visual impact analysis) are likely to be impacted from the proposed SVWE Project; however, the Draft EA generalizes these cultural sites and only calls attention to the Swamp Cedar ACEC.	Cultural Resources/archaeology is analyzed in a separate report (Villagren et al. 2009). Cultural resource reports are kept confidential to provide maximum protection to the resource. All cultural resource sites eligible for the National Register of Historic Places will be avoided. Therefore, there will be no impacts to known eligible cultural resource sites located within the project area. This assures the complete confidentiality in accordance with the <i>Archaeological Resources Protection Act of 1979 as amended</i> . The BLM encourages the Tribes to enter into an information sharing agreement which will allow access to these reports while maintaining the current level of protection. The ethnographic report reference is a draft report. There is a 5-mile radius for visual impact to historic structures only. Prehistoric sites currently do not require VRM. The BLM did discuss the potential visual impacts with the tribal representatives during the field meeting on July 17, 2010, to the proposed Swamp Cedar TCP and the consensus was that WTGs would only be visible on the eastern boundary of the proposed TCP and therefore minimal.
6	27	CR	4	9	The Draft EA fails to appropriately describe tribal territories and resources, provide a misleading representation that downplays the important ties that Indian tribes have to the proposed project area and the resources potentially impacted by the proposed SVWE Project. Our tribe, among others, is inextricably linked to the entire Spring Valley region, and especially to particular places within the region, the life-supporting water resources within the region, native plants and animals that our people hold sacred or utilize for hunting, gathering and medicinal purposes, and the spirits found throughout the landscape and particularly at water resource locations, ceremonial sites, and massacre sites. The proposed SVWE Project stands to directly, indirectly, and cumulatively impact all of these cultural resources.	Sections 4.6 and 4.7 of the Final EA have been revised to include a description of the resources present, the inventory conducted, and the Tribal Consultation completed without breaking confidentiality in order to better describe the potential direct, indirect, and cumulative impacts to those resources.
5	27	CR	4	9	The Draft EA on Page 61 (Section 3.7.1) incorrectly refers to the Swamp Cedars Massacre as a "battle". The terms "battle" and "massacre" do not carry the same meaning, nor have similar definitions. The CTGR and ethnographic experts and numerous authoritative literature sources provide several accounts of massacres at this site. Although at least one massacre may have been associated with the Goshute/Overland War, it incorrect to refer to the massacre as a battle. Thus, the terminology and descriptions are insufficient and/or incorrect and must be changed to accurately reflect the best available information.	The BLM apologizes for the mistake; the terminology in the Final EA has been revised to refer to "massacres" and not to "battles" or "war."

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Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
4	27	CR	33	9	While the Swamp Cedars ACEC and Massacre Site is certainly eligible under the National Register of Historic Places (NRHP), the CTGR feels that several additional sites should be eligible as Historic Properties under NRHP. Specifically, those sites include Village 11, Village 12, and the two festival sites near Village 12 (see Lahren et al. 2009, Figure 9). Eligibility under NRHP requires that a site is greater than 50 years old, possesses definable boundaries, and retains integrity and relation to a cultural group. Other criteria can be found under Parker and King (1990) and King (2008) that identify these sites as eligible under NRHP as Historic Places. The National Historic Preservation Act (NHPA) requires federal agencies to take into consideration actions that could adversely affect historic properties eligible for listing under NRHP. With this in mind, the BLM must consider how all of these cultural resources/sites are likely to be affected by the proposed SVWE Project. Case law interpreting NEPA and its regulations has repeatedly demonstrated that lead agencies must take a hard look at impacts, even in EA's tied to Programmatic EIS's (e.g., Alaska Wilderness League v. Kempthorne (548 F.3d 815, 826, 9th Cir. 2008)). It is clear that this Draft EA does not take a hard look at potential impacts for the entirety of cultural resources.	The exact locations of Village 11, Village 12, and the two festival sites are unknown. A Class III cultural resource inventory conducted of the area did not locate these specific sites. The Class III inventory was conducted for the entire project area including areas in between the proposed WTG locations. All known sites eligible for the National Register of Historic Places will be avoided. Cultural resource monitors will be present for all project-related ground-disturbing activities.
33	27	CR	32	7	Similarly, extraction of 5-10 million gallons of groundwater from the Cleveland Ranch in Spring Valley may have impacts on surrounding wetlands and spring water outputs. However, the Draft EA wrongfully assumes no potential impact on culturally and spiritually significant sites. The CTGR considers any change in spring water discharge and any change in the surrounding landscape, vegetation, wildlife, and spiritual significance to have impacted the integrity of the traditional cultural property. An such changes will disproportionately impact our people and our cultural resources, and thus, must be given consideration under the NEPA process. Anything less is in violation of NEPA, NHPA, and their operating regulations and case law has repeatedly affirmed that NEPA documents must disclose potentially significant impacts.	Water proposed for use in construction will come from a well which taps into a deep aquifer. This will not directly or adversely affect water that supports spring water discharge and will not impact on culturally or spiritually significant sites such as the Swamp Cedars. These areas of cultural and spiritual significance are fed by perched shallow aquifers that are influenced by annual fluctuation in local precipitation within the watershed.
9	30	CR	4	9	The EA does not disclose the potential impacts to the Great Basin National Heritage Area nor does it appear that they were consulted in the development of the EA. The Great Basin National Heritage Area contains nationally significant cultural, natural and scenic features that are emblematic of the entire Great Basin Area. National Heritage Areas are designated by Congress in recognition of the contributions they offer in making up the unique fabric of our country. For example, Wheeler Park is the historic location of 1870's geodetic survey and mapping of the West and is of national significance found both within a National Park and National Heritage Area. The addition of this wind farm and future projects could impair the historic integrity of the site, yet is not disclosed.	A description of the Great Basin National Heritage Route has been added to Section 3.6 of the Final EA.
2	34	CR	4	9	3.7.1 Overview of Ethnographic History of the Area: The BLM needs to be more specific in regard to how many massacres happened in the area-whether to ethnographic research or through literature research. "Shoshone families once inhabited the area, prior to the battle with U.S. soldiers..." Shoshone families continued to live in the area and still used the Swamp Cedars after the battle. The Duckwater Tribe knows that through other massacres happened in the vicinity. The loss of "one soldier and one horse" does not describe a battle, but a massacre, especially since the Shoshone/Goshute lost 23 people.	The BLM apologizes for the mistake; the terminology in the Final EA has been revised to refer to "massacres" and not to "battles" or "war."
1	34	CR	32	9	3.7 Native American Religious Concerns: The text mentions boundaries may be defined, the Duckwater Tribe has defined a boundary, in regard to the Swamp Cedars.	The text in the EA has been changed from boundaries "may" to "have" been defined in regards to the proposed TCP. The write up regarding the TCP is currently being worked.
5	34	CR	32	9	4.7 Native American Concerns: This topic is listed, but it does not list any Native American concerns, rather foreseeable impact. What is the mitigation step the BLM is going to take to respond to the concerns of the Duckwater Tribe as well as the other Tribes?	Sections 4.6 and 4.7 of the Final EA have been revised to include a more detailed description of the resources present, the types of inventories conducted, and the Tribal Consultation completed without breaking confidentiality in order to better describe the potential direct, indirect, and cumulative impacts to those resources. The BLM will respond directly through letters to those tribes that provided comments and address each of their concerns during continuing consultation.
7	34	CR	32	9	5.6 Native American Concerns: Again, the BLM states they have completed the Tribal Consultation, but does not list the types of concerns.	Section 4.7 of the Final EA has been revised to include a description of the concerns, resources present, types of inventories conducted, and the Tribal Consultation completed without breaking confidentiality in order to better describe the potential direct, indirect, and cumulative impacts to those resources.
8	34	CR	34	6	6.2 Programmatic Environmental Impact Statement Adopted Mitigation Measures: There is no mention to mitigation steps to address Native American concerns.	The mitigation measures identified in Section 5.12 and Table 6.1-1 of the Preliminary EA include a mitigation for impacts to Native American concerns.
12	34	CR	32	10	7.4 Summary of Tribal Consultation. The BLM has not conducted any meeting with the Tribe to address the Tribes concerns, in order to stay consistent with this; The BLM should follow up with meetings with the Duckwater Tribe.	The BLM has not yet met with the Duckwater Shoshone Tribe in regard to the proposed Spring Valley Wind Energy Facility Project. If the Duckwater Shoshone Tribe wishes to request a meeting with the BLM regarding this project, or in regard to any other project or concern, they need to contact BLM tribal coordinator Elvis Wall at (775) 289-1858, or by email at Elvis_Wall@blm@blm.gov to arrange for a meeting, or to request a BLM representative to attend a Tribal Council meeting.
6	34	CR	34	6	4.7.1 Programmatic Environmental Impact Statement Impacts Summary: The BLM states in this heading the Native American concerns are addressed in 6.2, but it does not mention any mitigation measures in 6.2. This omission had to be addressed. However in Table 6.6.6 PEIS Mitigation Rationale, Cultural Resources is listed- where are the Native American concerns? The BLM need to stay consistent in regard to their EA.	The mitigation measures identified in Section 5.12 and Table 6.1-1 of the Preliminary EA include a mitigation for impacts to Native American concerns.

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3	3	ECON	5	6	We chose Spring Valley, after many years of searching, to develop property for sale and our future home site. We had sub divided the property for residential lots prior to any knowledge of wind farm projects. We have had numerous parties interested in lots we have for sale until disclosing to them that there will be a wind project just north of the parcels, at that point, their interest quickly fades. We have invested our life savings in purchasing and development of this property and we believe that present and future marketable value and living conditions will be severely impacted.	Section 4.13.2.2 of the Preliminary EA states that there would be changes to the local economy as a result of the Proposed Action. It further states that a study prepared for the DOE in 2009 provides support that the presence of WTGs has no impact on property values.
3	7	ECON	5	6	The County anticipates economic benefit from the construction and operation of the proposed project through employment opportunities, new job generation, business activities, and tax revenues.	Thank you for your comment.
4	7	ECON	5	7	Pattern Energy has applied for Nevada's new Renewable Energy Tax Abatements which will abate sales and use as well as much of the real and personal property tax revenue the County would ordinarily realize from a project of this size. We are currently working with the company and they have agreed that they will enter into a Development Agreement with us to provide funding needed to address the impacts including emergency services, law enforcement, and public works if the abatements are approved by the Nevada Office of Energy.	Thank you for your comment.
2	8	ECON	5	6	This project also would increase substantially the tax base for our County with money going to support County and City Government, Schools, Hospital and other services to the citizens of the County. The project will produce clean, renewable energy to the citizens of the State of Nevada. It will produce enough energy to provide power for 40,000 homes.	Thank you for your comment.
1	8	ECON	5	6	We feel the Spring Valley Wind Project will bring badly needed jobs to White Pine County. We have been told the project would require up to 225 workers during construction, with 10 to 15 permanent jobs in the County after completion.	Thank you for your comment.
2	22	ECON	5	7	It takes three trucks just to haul one of the blades of the towers. The construction cost is going to be monumental. The wind turbines require constant maintenance, and upkeep is costly. The brushes continually need to be replaced.	Thank you for your comment.
4	22	ECON	5	8	Will White Pine County residents receive some compensation for giving up much sporting area for this project?? Nevada has been taken advantage of by Mining, and the gaming industry, so wouldn't it be great to implement something for Nevada or White Pine citizens like the Alaska oil royalties?	The project area has limited recreational or "sporting" value. Additionally, the BLM does not have the authority to implement a royalties program for the residents of White Pine County.
1	25	ECON	5	6	The Spring Valley Wind, LLC-proposed Spring Valley Wind Project would provide a much needed boost to economic development that will positively affect the White Pine County School District in terms of revenue and student enrollment. In addition, the project will help diversify the local economy that has been historically and predominantly dependent upon mining which has been an intermittent industry.	Thank you for your comment.
49	14	FIRE	6	6	Industrial wind turbines often experience malfunctions. Oils and lubricants will often for hours during chemical fires. Lighting strikes and electrical malfunctions do happen. The applicant should have a wild fire plan and that should be discussed in an EA.	The EA tiers to the analysis completed in the BLM Wind PEIS. Mitigations from the PEIS would be implemented as described in Table 6.1-1 of the Preliminary EA and include conducting safety assessments and the means to mitigate safety issues, including a plan to address the risk of wildfire.
12	26	FIRE	6	6	An accidental fire associated with the wind farm construction or operation would be devastating, and likely irreversible. It would occur on top of the disturbance this facility will cause. Such effects remain unanalyzed.	Fires occur regularly throughout the Great Basin. Mitigations as described in Table 6.1-1 of the Preliminary EA include conducting safety assessments and the means to mitigate them such as a fire control plan.
36	29	FIRE	6	6	Industrial wind turbines often experience malfunctions. Oils and lubricants will often for hours during chemical fires. Lighting strikes and electrical malfunctions do happen. The applicant should have a wild fire plan and that should be discussed in an EIS.	The EA tiers to the analysis completed in the BLM Wind PEIS. Mitigations from the PEIS would be implemented as described in Table 6.1-1 of the Preliminary EA and include conducting safety assessments and the means to mitigate safety issues.
6	16	HUM	7	9	The FONSI downplays the context of this project by stating that it is in a sparsely inhabited area and that the primary economic activities are ranching and mining. It neglects to mention that the project lies aside a major U.S. highway that is a significant tourist route.	The context section of the FONSI has been revised to describe the proposed project's proximity to U.S. Highway 50.
2	20	HUM	7	6	We run the risk of a huge surge in vector-borne diseases if we let mosquitoes get out of control. Malaria, Dengue Fever, West Nile, Yellow Fever-as someone who has traveled where these diseases are prevalent, I assure you that these are no joke!! They kill millions of people every year and we have them under control here, but mostly because we have mosquitoes under control-that could easily change and quickly.	The Avian and Bat Protection Plan would be implemented to mitigate the impacts to bats from the Spring Valley Wind Energy Facility. The claims that there would be an increased risk of vector-borne diseases from the proposed project is unsubstantiated.
6	21	HUM	7	7	Large wind turbines are hazardous to small aircraft.	The project has been reviewed and accepted by the Federal Aviation Administration.
2	21	HUM	7	7	Large wind turbines are unsafe.	A safety plan will be developed and implemented as part of the Construction, Operation, and Maintenance (COM) Plan.
8	21	HUM	7	7	Large wind turbines can cause "blade glint".	Glint is mitigated in modern Wind Turbine Generators by using low reflectivity materials in their construction.
7	21	HUM	7	7	Large wind turbines can cause "shadow flicker".	WTGS do cause "shadow flicker," however, because the Spring Valley WTGs are not located adjacent to residences, occupied buildings, or roadways, the effects of shadow flicker are minimized.

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10	21	HUM	7	7	Large wind turbines can cause harmonic ground vibration over many square miles.	Although it is possible for Wind Turbine Generators (WTG) to cause ground vibration, for a harmonic response from the ground to occur would require a frequency range similar to an earthquake. The WTGs proposed for Spring Valley would operate with rotational speeds of 10 to 20 rpm; i.e., the rotor makes a complete cycle every 3 to 6 seconds and a blade passes the tower every 1 to 2 seconds which is more than double the normal frequency of an earthquake. Additionally, the WTGs and foundations will be designed to ensure that the blade passing frequencies are not close to the natural (harmonic) frequencies of the structures and thus the tower and foundation will act as dampers with respect to the blade passing frequency, further reducing the energy transferred to the soil.
11	21	HUM	7	7	Nearby residents may suffer loss of sleep and nausea called "wind turbine syndrome".	Wind turbines have been present in the United States for 30 years. Today there are more than 35,000 operating wind turbines in the United States and to date there is no credible scientific evidence that they have created any adverse health effects. Colby et al. (2009) states, "There is no credible scientific evidence that low levels of wind turbine sound at 1 to 2 Hz will directly affect the vestibular system. In fact, it is likely that the sound will be lost in the natural infrasonic background sound of the body."
30	27	HUM	7	7	Given the close proximity of the project site to important cultural resources and sites that are used by members of our tribes, the BLM should provide the CTGE with the comprehensive list of hazardous materials that would be used, stored, transported or associated with any sort of monitoring, testing, construction, operation, and decommissioning of the SVWEF (see Table 6.1-1). Because our people use the region for its spiritual, botanical, and wildlife resources, the CTGR must have the opportunity review and comment on any hazardous material management plan, waste management plan, and pest management plan for energy facility. Moreover, the CTGR must be notified in the event of any hazardous or waste material spill on or near the project site.	This would be done as part of the Construction, Operation, and Maintenance (COM) plan.
10	34	HUM	7	6	The BLM has not addressed Environmental Justice throughout the EA. The EJ is requires to be addressed in EIS's and EA's	Environmental Justice is addressed in Table 3.1-1 of the Preliminary EA. No minority or low-income groups would be disproportionately affected by health or environmental effects of the proposed project.
1	13	LR	8	8	I don't think the state of Nevada has a comprehensive plan. It's just put the huge turbines wherever we can place them.	No commercial wind energy facilities are currently in operation in the state of Nevada.
18	28	LR	8	9	SNWA's existing and proposed ROWs located within and adjacent to the SVW Project area are identified in the Land Use affected environment chapter. However the environmental consequences chapter provides no detailed discussion regarding whether the SVW Projects will be compatible with SNWA's GWD Project. Draft EA, at 126. BLM should clarify guaranteed access to SNWA existing ROW N-84216 (piezometers).	Section 4.11.2.1.2 of the Preliminary EA states: "...there would be no impacts to utility corridors and other existing ROWs from implementing the proposed action." The following has been added to Sections 4.11.2.1.2 and 4.11.3.1.2 of the Final EA for clarification: "including SNWA ROW N-84216 (piezometers)."
20	31	LR	8	6	The proximity of Great Basin National Park was not adequately evaluated.	Impacts to Great Basin National Park are described in Sections 4.8 - Visual Resources, 4.9 - Noise, and 4.12 - Recreation.
6	31	LR	8	8	Spring Valley Wind attempts to locate a massive facility within view and close proximity of Great Basin based on the park's remoteness from urban areas but remoteness should not be a consideration that supports locating a WGF. Instead, Great Basin's remoteness should be a reason to not site an industrial complex in the area. Increasingly, with urban sprawl and the frenzied pace of contemporary life, remote areas become increasingly important. Visitors to Great Basin attest to the "get-away" attributes of the park.	The proposed location for the Spring Valley Wind Energy Facility is not based on the remoteness of the area, but on the existing wind resource (which is identified in the BLM Ely RMP), and the existing access to power distribution.
1	33	LR	8	7	The Department of Transportation has a number of Material Site right of ways near the proposed Spring Valley Wind Generating Facility. These material sites are along or near SR893 and US6/50. Most of the sites are not impacted by the Generating Facilities. However, one of these material site right of way, NEV055079, is adjacent to one of the proposed gravel sources for construction of the Generating Facility. NEV055079 is located in: W 1/2 SE1/4, Section 04, T14N R67E.	Thank you for your comment.
1	2	NEPA	10	7	The EA is no where to be found on the web. Just a bunch or endless circles. Very typical. Where is it?	The preliminary EA is available on the web at: http://www.blm.gov/nv/st/en/fo/ely_field_office/blm_programs/energy/spring_valley_wind.html . The EA was available at this location and directly from the BLM throughout the comment period (7/19/2010 - 8/18/2010). Also, hard copies were made available to those that requested one.
1	3	NEPA	41	6	We have requested in past communications that the wind turbines situated on the southeast corner of the project be moved to alternate locations to help minimize the effects to our property and future living conditions. After viewing the new revised alternative wind turbine layout map, there have been no changes in regards to the southeast turbines.	The turbine is 0.5 mile from the WTG facilities to the property line, and 1 mile from the WTG facilities to the nearest structure on the property. The WTGs have been located to utilize the most consistent wind resource, while limiting potential resource impacts as well as to meet the minimum setback requirements from the requested ROW boundary.
1	4	NEPA	40	6	I demand that Ely BLM require Spring Valley wind to prepare an Environmental Impact Statement for this project. An EA is unacceptable for a project of this size in such a sensitive area.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment is an appropriate document as it tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.

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8	4	NEPA	40	6	There is every reason to prepare an EIS for this project. These impacts are potentially significant. You are failing in your duty as stewards of the public domain if you do not require full environmental documentation of this project.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment is an appropriate document as it tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
1	6	NEPA	10	7	Spring Valley Wind, LLC, can show that the permitting process here is fair and manageable, something that can not be said about all locations. Geothermal energy, like gold, is where you find it. But the studies of wind patterns have shown that Spring Valley Wind can be a success. We hardly endorse its approval.	Thank you for your comment.
1	7	NEPA	46	7	The Commission has reviewed the revised Preliminary Environmental Assessment and we find that the document and appendices adequately analyze the potential impacts of the proposed project. We applaud Pattern Energy for its willingness to conduct additional study on bat and avian populations and behavior and to work with US Fish and Wildlife Service and the Nevada Department of Wildlife to address concerns about wildlife and especially Sage Grouse habitat. The studies completed for the Environmental Assessment not only provide a thorough understanding of the potential impacts of the proposed project, they provide information that helps to better understand the natural, cultural, and historical resources in the surrounding area.	Thank you for your comment.
2	7	NEPA	48	7	The County Commission believes that the mitigation and conservation measures listing in Sections 2.2.4, 6.2, and 6.3 of the EA; the relevant Best Management Practices listed in the Wind Energy Development Programmatic Environmental Impact Statement and the Ely Proposed Resource Management Plan/Final Environmental Impact Statement which are incorporated into the document the Restoration and Weed Management Plan; the additional survey to be conducted by an approved botanist to identify and survey habitat of sensitive species within 100 feet of the construction disturbance; and the additional plans and measures to be included in the Construction, Operation and Maintenance Plan will provide adequate protection for the resources in North Spring Valley.	Thank you for your comment.
1	10	NEPA	40	6	This EA is over 161 pages long, in part because it repeats much general information from a previously published Programmatic Environmental Impact Statement (PEIS) on wind energy projects. Specific information about public lands and resources impacted by the proposed project is sparse and difficult to find. NEPA does not allow EA's to be a substitute for a full EIS when a project of this scale is proposed on public lands. NEPA and Council of Environmental Quality implementing rules and regulations do not allow EAs of this size.	The analysis in the SVWEF EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. In addition, a case discussed by CBD, Sierra Club v. Marsh, specifically states that it will "not give conclusive weight, one way or the other, to the simple facts of EA length, complexity, and controversy," but will focus instead on "the lawfulness of the agencies' finding that the project will have no significant impact on the environment."
4	10	NEPA	40	6	We strongly urge the BLM to conduct a full and open EIS process for this proposed project.	The analysis in the SVWEF EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
15	10	NEPA	40	6	A full EIS should thoroughly analyze the project impacts on all wildlife and plant species, design alternatives to avoid adverse impacts, and require mitigation for all unavoidable adverse impacts.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA does describe the impacts to wildlife and vegetation, includes and alternative that avoids sensitive resources, and includes extensive resource conservation measures and mitigations to limit unavoidable adverse impacts.
16	10	NEPA	42	6	A full EIS should analyze the cumulative impacts of all expected future energy developments in Spring Valley on Spring Valley public lands and resources.	Reasonably foreseeable future wind projects in Spring Valley, and their associated transmission needs, are described in Table 5.0-1 of the Preliminary EA and are included in the cumulative impacts analysis.
14	10	NEPA	42	6	The EA fails to adequately assess cumulative impacts of the current and future energy projects in Spring Valley. How many wind and other energy projects area planned for siting in Spring Valley? (You can check the BLM map at: http://www.blm.gov/pgdata/etc/modialib/blm/nv/energy.Par76092.File.dat/20090610_renewable_energy_projects_map.pdf). What additional powerlines are planned in Spring Valley to carry future energy?	Reasonably foreseeable future wind projects in Spring Valley, and their associated transmission needs, are described in Table 5.0-1 and included in the cumulative impacts analysis.
13	10	NEPA	46	6	The EA fails to do adequate assessments of project impacts to other public resources, including raptors, pygmy rabbits, and all of the rare plants in the project area in Spring Valley.	Impacts to raptors are described in Sections 4.2.2.6, 4.2.3.6, 4.3.2.5, and 4.3.3.5. Impacts to pygmy rabbits are described in Sections 4.3.2 and 4.3.3. Based on GIS data available through the Nevada Natural Heritage Program (NNHP), Parish phacelia (<i>Phacelia parishii</i>) is the only federally or state protected plant species known to occur within or near the project area. Impacts are described in Sections 4.3.2.7 and 4.3.3.7.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
2	10	NEPA	46	6	This EA fails to provide site specific information on Spring Valley public lands and resources.	Chapter 3 of the Preliminary EA presents information on the potentially affected existing environment.
1	11	NEPA	40	6	Given the profound impacts on bats, song birds, sage grouse, and swamp cedars, this project warrants a full Environmental Impact Statement.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
4	11	NEPA	40	6	There are significant impacts and an EIS is needed. The Programmatic EIS for wind projects considered the overall impacts, but it is the Department of Interior's responsibility to be a steward of its lands - BLM land and the National Park.	The analysis in the SVWEF EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
5	11	NEPA	45	6	This project does not appear to be coordinated with NPS. It also appears to be on an expedient fast track. Please slow down, BLM, and take time to consider all the impacts at an EIS level, including if there is sufficient wind to justify the desecration of the public land and the creatures and communities that depend upon it.	The National Park Service participated in a project stakeholder meeting held in Ely on October 20, 2008. Additionally, The NPS was provided the opportunity to comment on a Draft EA prior to release for public comment. The Preliminary EA discloses impacts of the proposed action and alternative action as well as an extensive list of resource conservation measures and mitigation measures to reduce the level of potential impacts.
1	14	NEPA	40	7	It is inappropriate for the BLM to attempt to streamline approval of this project with only an Environmental Assessment. Every other wind energy project proposal on public lands, many with fewer turbines on smaller acreage, is undergoing full review with the required Environmental Impact Statement. Placing an 8,500 acre wind energy facility in this area will undoubtedly create unlimited problems with wildlife resources. In spite of efforts from the public to participate in informing BLM personnel about the direct and cumulative impacts of this project, it is still being frivolously rushed through by the agency with only an inadequate EA.	There are operating wind facilities on BLM lands in the adjacent states of Utah and Arizona that have gone through the NEPA process under an Environmental Assessment tiered to the Programmatic Wind EIS, including the Milford Wind Farm in Utah, and the Dry Lake Wind Farm in Arizona. Additionally, as stated in BLM IM 2009-043 Wind Energy Development Policy "To the extent that the Programmatic EIS addresses anticipated issues and concerns associated with an individual wind energy project, including potential cumulative impacts, the BLM will, by policy, tier off of the analysis in the Programmatic EIS and limit the scope of additional project-specific NEPA analyses."
10	14	NEPA	41	6	An EIS should list at least three more alternatives. The Alternative Development Alternative still would disturb the hydrological resources of the Swamp Cedars Area of Critical Concern, disrupt connectivity for pronghorn antelope, remove habitat for the sage grouse and pygmy rabbit, still kill many raptors and passerines, and still potentially destroy the population of Mexican free-tail bats in the Rose Guano Cave. We are surprised that the EA fails to find an alternative away from the site. The project is centrally placed in the worst location possible concerning preservation of wildlife resources. We can only conclude that BLM is pandering to Pattern Energy so they can get the shortest distance to a transmission line. The DEIS fails to consider enough alternatives and fails to follow the requirements of NEPA listed below. There is no quantitative data that proves that this project will have economic benefits and offset greenhouse gas emissions.	The BLM elected to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American conflicts. The Preliminary EA does disclose there would be impacts to wildlife resources as a result of each alternative, however, there is no evidence that the project location is the "worst location possible concerning preservation of wildlife resources." As summarized in Section 8.3.4.2 of the BLM NEPA Handbook, section 102(2)(E) of the NEPA provides that agencies of the Federal Government shall "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources."
13	14	NEPA	41	6	The BLM has failed to provide an adequate alternative away from the site. Although we do not feel that a project like this is appropriate on public lands, we do feel that the BLM has provided an incomplete analysis of alternatives based on the DEIS and would like to see one off site. An alternative should be developed using lands at least twenty miles away from the Rose Guano Cave.	Alternate project locations were considered as described in Sections 2.5.1 and 2.5.2 of the Preliminary EA. The project area is currently 4 miles from Rose Guano Cave. An alternate location farther from the Cave would not necessarily reduce potential impacts to the Brazilian free-tailed bats, and may result in greater impacts to other resources such as greater sage-grouse resulting from the need for a new transmission line to be installed.
11	14	NEPA	41	8	Distributed generation in the built environment should be given much more dispatchable baseload behind it, and also does not have storage. But environmental costs are negligible with distributed generation, compared with the Spring Valley Wind project. Distributed generation cannot be "done overnight", but neither can large transmission lines across hundreds of miles from remote central station plants to load centers. Most importantly, distributed generation will not reduce the natural carbon-storing ability of healthy desert ecosystems, will not disturb soil crusts, and will not degrade and fragment habitats of protected, sensitive, and rare species.	A distributed generation alternative would not meet the purpose and need for action. Additionally, the BLM does not have the authority to make a decision on distributed generation.
14	14	NEPA	41	8	Please provide another No Action Alternative that denies approval of the project and designates the region unsuitable for wind energy development.	Land use allocations that designate BLM managed lands as unsuitable for a specific use can only be made through the land use planning process. The current BLM RMP identifies Spring Valley as having high wind energy potential. Designation of the region as unsuitable for wind energy development would be an action alternative that does not meet the purpose and need of the project and would have to be completed through a land use plan amendment.
12	14	NEPA	41	8	Alternatives should be looked at that are in load centers, not closest to the project site. There is a need to consider the "macro" picture, the entire state, to look at maximum efficiency.	Considering alternative locations throughout the entire state is beyond the scope of analysis for the proposed Spring Valley Wind Facility. Such a wide range of alternatives would not meet the purpose and need for action.

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6	14	NEPA	42	6	This project will directly impact 8,500 acres as well as cumulatively impact Spring Valley as a whole.	Impacts described in Chapter 4 include both the direct ground disturbance associated with the proposed Wind Energy Facility, as well as impacts related to the presence of construction equipment and operating Wind Turbine Generators. The Cumulative Impacts analysis considers the Spring Valley Watershed as a whole.
2	14	NEPA	45	6	Although we understand that BLM is under considerable political pressure to develop renewable energy, we believe it is unwise for the BLM to be using "fast tracking" seemingly to expedite approval of this project. We feel that there are enough outstanding unresolved issues that make approval and construction of facilities by December of 2010 under the American Recovery and Reinvestment Act a very unrealistic goal. This process has led to an unreasonably rushed schedule that has the potential to have long term impacts on natural resources and overlooks the many concerns that public and adjacent private land owners have raised. The rushed schedule has resulted in a distrust and lack of faith in the ability of our public land agencies and elected officials to actually develop renewable energy in a way that could be sustainable for the future. Furthermore, the fast tracking undermines laws established under the National Environmental Policy Act that have been enacted to insure that resources on public lands are managed soundly for future generations. We would also like to request that the deadline of this comment period be extended so interested parties may comment fully.	As stated in Section 1.1 of the Preliminary EA: Spring Valley Wind applied for a ROW grant for Commercial Wind Energy Development in October of 2007. The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant." Through the NEPA process of preparing an Environmental Assessment (EA), the public has had the opportunity to comment on the initial preliminary EA during the public comment period (12/16/2009- 1/15/2010) and during public meetings. In addition a public comment period was established from July 17 to August 18, 2010, on the revised Preliminary EA. The deadline for comments on the Preliminary EA has not been extended.
23	14	NEPA	45	6	NEPA requires agencies to disclose environmental consequences, but the Executive Order 13212 directs Federal Agencies to streamline the approval of environmentally responsible renewable energy. BLM is succeeding all too well in streamlining approval but falls dramatically short on insuring that the Spring Valley Wind Project will be environmentally responsible.	The Preliminary EA discloses the environmental impacts of the proposed project in Chapter 4 and identifies resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6 that would be required in order to reduce those impacts.
3	14	NEPA	46	7	Please explain the reasoning for issuing a "Draft Findings of No Significant Impact". We believe it is not appropriate for the BLM to assume that this project deserves this consideration before they can consider all of the comments from interested parties.	The BLM is also seeking comments on the draft Finding of No Significant Impacts per guidance in BLM Handbook H-1790-1 section 8.4.2. The FONSI would not be signed until the public review is completed and any necessary changes to the Final EA are made.
18	14	NEPA	48	6	The DEIS inadequately analyzes the project's potential to remove soil crusts, thus causing an erosional chain reaction that will result in increased dust from blowing winds. How would this be mitigated?	Section 2.1.2.2 of the Preliminary EA address mitigation for the potential for increased dust. It states that "In addition to grading, the application of new gravel may be necessary to maintain road surfaces. Water would be used as needed for dust control." In addition, a dust abatement plan will be included in the final COM plan.
17	16	NEPA	10	6	The nature of the decision warrants and the public deserves an opportunity for full public participation in the NEPA process through the preparation of an environmental impact statement.	Through the NEPA process of preparing an Environmental Assessment (EA), the public has had the opportunity to comment on the initial preliminary EA during the public comment period (12/16/2009- 1/15/2010) and during public meetings in Ely and Baker. In addition, a public comment period was established from July 17 to August 18, 2010, on the revised preliminary EA.
21	16	NEPA	10	6	The public has not been adequately informed by the BLM of the potential impacts from this project due to the nature of the EA process as opposed to an EIS process. It appears that the BLM is reticent to provide adequate information to the public on the environmental impacts of the proposed project and compliance with BLM's duties pursuant to FLPMA and the internal direction, such as BLM Manual 6840-2, to protect the resources of these public lands.	Through the NEPA process of preparing an Environmental Assessment (EA), the public has had the opportunity to comment on the initial preliminary EA during the public comment period (12/16/2009- 1/15/2010) and during public meetings in Ely and Baker. In addition, a public comment period was established from July 17 to August 18, 2010, on the revised preliminary EA.
3	16	NEPA	40	6	The Council on Environmental Quality's regulations implementing NEPA make clear that federal agencies can avoid preparing an EIS only if the federal action will have "no significant impact" on the environment. 40 C.F.R. 1501.4(e). Case law interpreting the regulations indicates that the agency should make this finding confidently and with certainty that no "substantial questions" exist as to whether or not "a project may have a significant effect." See LaFlamme v. Fed. Energy Regulatory Comm'n, 852 F.2d 389, 397 (9th Cir. 1988). Because the proposed race may in fact have significant impacts, the BLM is required to prepare a full EIS. As the Ninth Circuit has observed, "No matter how thorough, an EA can never substitute for preparation of an EIS, if the proposed action could significantly affect the environment."	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant." In addition, Chapter 6 of the PEA describes mitigation measures consistent with BLM NEPA Handbook Section 6.8.4 which states in part, "Mitigation measures can be applied to reduce or eliminate adverse effects to biological, physical, or socioeconomic resources. Mitigation may be used to reduce or avoid adverse impacts, whether or not they are significant in nature."
1	16	NEPA	40	6	We are extremely dismayed and disappointed that the BLM has once again erred in preparing an EA rather than an Environmental Impact Statement. Given the significance and intensity, we and others called for an EIS to be prepared in our earlier comments. The Ninth Circuit has repeatedly held, an EIS must be prepared if the EA shows that the proposed project may cause significant impacts to the environment. 40 C.F.R. 1501.3, 1501.4; see, e.g., Ocean Advocates v. United States Army Corps of Eng'rs, 361 F.3d 1108 (9th Cir. 2004); Metcalf v. Daley, 214 F.3d 1135, 1142 (9th Cir. 2000); Blue Mountain Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998). NEPA requires the BLM to prepare an environmental impact statement if "substantial questions are raised as to whether a project... may cause significant degradation of some human environmental factor." To trigger this requirement a 'plaintiff need not show that significant effort will in fact occur.' raising 'substantial questions whether a project may have a significant effect' is sufficient." Idaho Sporting Cong. v. Thomas, 137 F.3d 1146, 1149-50 (9th Cir. 1998)(internal citations omitted); see also 42 U.S.C. 4332(2)(C). While	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The Preliminary EA also identifies extensive resource conservation measures listed in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required by the BLM and would reduce potential impacts to a less than significant level.

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5	16	NEPA	40	6	In this instance, both the context and intensity of the proposed decision show that an EIS should have been prepared for the entire project. Given the scope and intensity of the likely impacts, we believe, the BLM would be hard pressed to make a "convincing statement of reasons" that the impacts of the proposed wind development are insignificant.	The BLM has not issued a decision document, only the Preliminary EA, and draft Finding of No Significant Impact. Analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant."
11	16	NEPA	46	6	The "substantial questions" raised by the types of impacts likely to be associated with the proposed development certainly implicate many of the NEPA regulations' "intensity" factors, including those relating to "unique characteristics" of the project area.	Chapter 3 of the PEA describes the existing character of the affected environment. Project Resource Conservation Measures and Mitigation Measures are included as part of the Preliminary EA to ensure that impacts do not reach a level of significance beyond what is described in the Wind PEIS.
4	16	NEPA	48	6	In this case there are substantial questions as to whether the proposed wind energy development would significantly impact the natural and human environment, including via impacts to wildlife, habitat, springs and visual resources. Before reaching any conclusion that the impacts will not be significant, the BLM must put its action into context and evaluate the intensity of the action and likely environmental effects.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant."
2	16	NEPA	48	6	Where impacts to imperiled species are at issue, the agency must carefully consider all potential adverse effects. As the Ninth Circuit put it: "[a]lthough the presence of some negative effects does not mandate a finding of significant impact, the agency must 'consider the degree of adverse effect on a species.'" Alaska Wilderness League v. Kempthorne, 548 F.3d 815, 826 (9th Cir. 2008) (finding the agency failed to take a hard look at impacts to whales in an EA tiered to a programmatic EIS). See also Native Ecosystems Council, 428 F.3d at 1250 (finding agency analysis insufficient where record failed to describe the type or amount of habitat necessary to sustain the viability of the species).	Section 4.3 - Special Status Species of the Preliminary EA summarizes the impacts to special status species described in the Wind PEIS, and goes into further detail describing the potential adverse impacts to special status species known to have the potential to occur in the Spring Valley project area. Those adverse impacts are based on field surveys completed and data collected that are specific to the Spring Valley Project. Additionally, the Preliminary EA includes a site-specific Avian and Bat Protection Plan to mitigate impacts identified for bird and bat species including special status species.
4	17	NEPA	40	6	NWP believes that this study should have been conducted at the Environmental Impact Statement level and not as an EA. NWP does not agree with the BLM that the NEPA process for this project can be tiered off of the PEIS because an EA does not adequately address potential impacts to the resources in and near the proposed project in Spring Valley. We think that there should be more detailed analysis of possible alternatives.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA does provide a detailed analysis of the impacts of the proposed action and includes an alternative that avoids sensitive resources. Additionally, the preliminary EA includes extensive resource conservation measures and mitigation measures to limit unavoidable adverse impacts.
13	17	NEPA	42	6	Cumulative effects are not adequately addressed within the EA. There are a total of 16 wind projects and three transmission projects listed on the Nevada BLM website in the Ely district alone. The EA lists only three projects in the reasonably foreseeable future. NWP requests that all of the renewable energy projects that are not listed in the cumulative effects section.	Table 5.0-1 of the cumulative impacts analysis summarizes the past, present, and reasonably foreseeable future actions that are considered for cumulative impacts. The reasonably foreseeable future actions considered in this EA are those that are in planning stages with a reasonable expectation of occurring over the anticipated life of the project. Considering the effects of all proposals on BLM lands in the Ely District is too broad an analysis. As described in Chapter 5 of the PEA, the geographic area of cumulative impacts analysis is generally based on the natural boundaries of the resource affected.
1	17	NEPA	42	8	Nevada Wilderness Project recognizes that much of the BLM lands in Nevada have been seen cumulative impacts from various land uses that have fragmented, degraded or destroyed wildlife habitats throughout Nevada. We ask that the Ely Bureau of Land Management consider the cumulative impacts of land use including additional proposed renewable projects and management activities as they are related to cultural resources and wildlife and their habitats in a more holistic fashion.	Table 5.0-1 of the cumulative impacts analysis summarizes the past, present, and reasonably foreseeable future actions that are considered for cumulative impacts. Considering the effects of past actions on BLM lands throughout Nevada is too broad an analysis. The geographic area of cumulative analysis is generally based on the natural boundaries of the resources effected by the proposed Spring Valley project.
3	17	NEPA	42	8	The Spring Valley wind energy project and other future development on BLM lands should have conservation offsets for cumulative impacts in the form of strong, permanent protection of landscapes that possess high quality wildlife habitats, cultural or other unique resources. This protection may be in the form of administrative designations, assuming such designations have strong, enforceable management language that will remove threats to further degradation of resources, or through specific agency requests for legislative designations that would add important areas to the National Landscape Conservation System.	The BLM can only make administrative designations such as Areas of Critical Environmental Concern through its land use planning process or by amending its existing land use plan. The BLM does not have the authority to make legislative designations adding areas to the National Landscape Conservation System. Additionally, there are currently several designated areas providing for the permanent or long-term protection of wildlife habitat, cultural resources, and lands surrounding the proposed Spring Valley Wind Facility; High Schells Wilderness, Mount Moriah Wilderness, Great Basin National Park, Rose Guano Cave ACEC, and Spring Valley ACEC.
5	17	NEPA	45	7	We understand the Spring Valley Wind project was designated as one of the "Fast Tracks," but this does not mean that the analysis should be less rigorous.	The term "Fast track" was only used to give a priority to this project among all the other renewable energy projects and was not connotative to the speed of the environmental analysis. Extensive field surveys for biological, cultural, special status species, hydrology, and visual resources were conducted in support of the analysis in the Preliminary EA as found and described in Chapter 4. The Preliminary EA does provide a rigorous and detailed analysis of the impacts of the proposed action and includes an alternative action developed to provide additional avoidance of sensitive resources. Additionally, the Preliminary EA includes extensive resource conservation measures and mitigation measures to limit unavoidable adverse impacts.

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19	18	NEPA	10	8	As noted in the document and as identified in Appendix F in the ABPP, the Technical Advisory Committee will be tasked with protecting wildlife resources at the SVWEF. It is anticipated that a considerable amount of time will be required by members of this TAC. As such, participating agencies should be eligible for cost reimbursement for the time and expense incurred in the committee process. NDOW provided this comment on the June 2010 administration draft version of the document. BLM's response directly to NDOW was "Cost reimbursement is something that must be worked out as part of the TAC charter when signed." It should be stated in this EA that agencies participating in the TAC will be reimbursed for time and travel expenses.	Determining cost reimbursement is appropriately addressed as part of the TAC charter and not through the EA.
2	18	NEPA	46	9	The programmatic EIS on Wind Energy Development is now five years old and has not kept pace with developments in technology, nor does it draw on the experience gained from five years of wind energy operations. The direction from the Programmatic EIS was to incorporate sufficient on-site data was not utilized to develop a clear picture of the night-time bird activity nor the anticipated mortality of birds and bats. Although this is not a requirement, NDOW feels that it would have allowed for a more accurate accounting of anticipated impacts.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. While the Preliminary EA does summarize the relevant impacts described in the PEIS, it also provides site-specific detailed analysis of the impacts of the proposed action and alternative and relies on the current best available information on technology and data on impacts from wind energy facilities. Based on conversations with NDOW following this comment, a measure has been added to the initial mitigation measures in the ABPP to complete nocturnal surveys using both radar that will be on site as well as other means such as video technology. That data will be used to help inform adaptive mitigation measures if avian mortality is found that correlates to survey data. Reliable data regarding avian use in the RSA was collected and detailed in the pre-construction avian and bat study report by SWCA.
1	18	NEPA	48	6	There is a lack of experience in documenting the environmental impacts and developing suitable mitigation for wind projects in Nevada. NDOW has identified a need for developing a set of standardized protocols for preconstruction surveys and project monitoring for bird and bat mortality within Nevada. Development of a current industry-wide list of effective best management practices to minimize project impacts would also be of great value.	The Preliminary EA identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required.
9	18	NEPA	48	7	On page 144, in Section 6.1 Mitigation, the environmental assessment states "If implemented, these mitigation measures in combination with the design criteria and relevant PEIS and RMP/FEIS measures would eliminate or substantially reduce all potential impacts." Data from the proponents existing mitigation operations (which utilizes this technology) that would support this contention are not available for review. This information would be very helpful demonstrating the effectiveness of the technology in reducing impacts to wildlife resources. NDOW would like to review this data as soon as it becomes available.	BLM will provide NDOW with data as it becomes available.
4	20	NEPA	40	7	Start by requiring a full EIS.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative.
31	26	NEPA	10	6	Table 3 of the Plan reveals that BLM and the proponent ignored public comment and input on their prior deficient PEA.	Chapter 7 of the PEA describes the public participation and agency consultation opportunities made available by the BLM prior to and during preparation of the EA. The BLM considered all public comments received on the initial Draft EA during the preparation of this Preliminary EA.
24	26	NEPA	10	6	BLM still has not listened to significant public comments, and significant issues raised. The PEA cumulative impacts analysis remains greatly lacking. Many issues raised on comments on the PEA and otherwise include: Alternative siting evaluation focusing on disturbed sites/areas closer to where energy will be used. Collection of much more complete avian and other Baseline data was ignored. Concerns about the inadequacy of data and analysis of impacts were ignored. Detailed analysis of effects of development on water resources, ACEC, and other values are minimally examined. Fire risk, toxic materials, full effects of noise pollution, light pollution, and severity of environmental change are ignored. Significant impacts to local and regional populations of wildlife are only minimally examined. Mitigation and its effectiveness remain highly uncertain.	In addition to summarizing the relevant impacts described in the BLM Wind PEIS, the Preliminary EA also describes the site-specific impacts to water resources, ACEC, noise, night skies, and wildlife, and includes an alternative that avoids sensitive resources, as well as extensive resource conservation measures and mitigations to limit unavoidable adverse impacts. The analysis is based on the best available data including site-specific data collected on avian and bat species associated with the project area, 100% coverage cultural resource inventories, and visual contrast analysis. The EA includes an alternative layout for analysis, and describes alternative locations that were considered but eliminated from detailed analysis.
62	26	NEPA	10	6	Plus, this Turbine shut down all appears to be in the hands of Industry, Since SVW has failed so miserably in acquiring necessary upfront data and being responsible in the NEPA process, the public can put no faith in "responsible" shutting off of turbines. If the company won't even bother with EIS level analysis, it is hard to believe will never adequately curtail turbine use - since turbine operation represents profits. Will any of this data be public? Will it be for Industry Eyes only, as the wind speed data not is?	A variety of field studies, including both avian and bat surveys, were conducted over a two-year period in response to concerns about potential wildlife impacts of the proposed Spring Valley Wind Facility. The Avian and Bat Protection Plan requires initial turbine curtailment be conducted between August 1 through September 31 in the first year of operations because of the presence of Brazilian free-tailed bats. In addition, the ABPP includes and adaptive management process for when mortality thresholds are exceeded. The BLM Authorized Officer is the decision-maker regarding additional mitigation measures for implementation, not the proponent. The data collected will be available to the public.

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59	26	NEPA	40	6	BLM is using the irreplaceable and highly vulnerable rare bat species of Spring Valley for "experiment" in testing technology. It is also relying on highly risky "adaptive management" - without ever providing necessary key data, or examining the likely effects on local and regional populations under a variety of scenarios. This alone requires preparation of an EIS.	As described in Section 5.2 of the Avian and Bat Protection Plan, existing data support the initial curtailment mitigation being implemented because of the presence of Brazilian free-tailed bats. Studies have shown that increased cut-in speeds are effective in reducing bat mortality by 53% to 87%. Site-specific testing would be conducted to determine the effectiveness for this proposed project. Additionally, the analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant."
64	26	NEPA	40	6	An EIS is required to provide full and detailed analysis of any and all mitigation actions, plans, etc.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) is prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
1	26	NEPA	40	6	It is impossible to understand why Ely BLM will not prepare the necessary EIS for this precedent-setting, major and expensive project that is poised to destroy interstate and perhaps Westwide populations of migrating bats, as well as large numbers of the Great Basin's Golden Eagles and other raptors, migratory songbirds, and world class scenic views on the edge of Great Basin National Park. This Project is certain to have highly significant adverse impacts to the environment. Just the visual impacts alone will be greatly significant and highly discordant in this unique valley and remote rural area accessed by the Loneliest Highway on America, and bordered by scenically spectacular public lands. The valley is a critical component of the spectacular views of, and from, Great Basin National Park.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant." Also Chapter 4.0 of the PEA presents the anticipated environmental consequences of implementation of each alternative.
76	26	NEPA	40	6	There are clearly extraordinary circumstances, and extraordinary concerns related to any development in Spring Valley with its many spectacular and imperiled resources. So an EIS is essential.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) is prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
58	26	NEPA	40	6	The project has already gotten off to a terrible start by trying to do things in a slipshod manner with two successive woefully deficient EAs. The only way public confidence can be restored is if the whole range of effects, based on solid upfront much more intensive and extensive biological, aquifer/soil stability, weather, recreation/visual, and other studies are conducted.	Chapter 4 of the PEA presents the anticipated environmental consequences of implementation of each alternative as described in Chapter 2. For the analysis, existing data, appropriate scientific methodologies, and professional judgment were used. The analysis also takes into account the resource conservation measures identified in Chapter 2, including referenced appendices. This analysis was done using the best available information, including site-specific data collected during bird and bat studies, cultural resource inventories, and visual contrast analysis. Additional data from the PEIS and from federal and state agencies for resources in the area were used to support the analysis.
16	26	NEPA	40	7	EA at 2 states: In October 2007, SVW applied for a ROW grant from the BLM for Commercial Wind Energy Development Facilities, as described in IM 2006-216. The ROW application included a draft Plan of Development for the construction, operation, and maintenance of the 149.1-MW Spring Valley Wind Energy Facility (SVWEF) and associated facilities. Additionally, a mineral materials permit would be issued for Gravel Pits A and B. The proposed SVWEF would be located in Spring Valley about 20 miles east of Ely, Nevada (Figure 1.1-1). Facilities for the Proposed Action would consist of 75 wind turbine generators (WTGs), an underground electrical collection system, a substation, a switchyard, and operations and maintenance (O&M) building, and access roads. The BLM determined that an EA was needed to determine whether the project would result in significant environmental impacts beyond those already disclosed in the NEPA documents discussed in Section 1.0. This shows Ely BLM has long known about this project, the highly controversial nature of various development and resource depletion schemes in and near this area, yet has absurdly refused to require that the Applicant/proponent prepare the necessary EIS. This may very well be due to the extreme politicization of this project, and bias within the Interior Department in favor of this and several other energy project proposals. This bias may be	The BLM Handbook describes in Chapter 8, "An environmental assessment is a tool for determining the 'significance' of environmental impacts; it provides a basis for rational decision making." The BLM is following the NEPA process.
7	26	NEPA	40	7	If this project is allowed to go forward under this greatly inadequate EA that fails to analyze all direct, indirect and cumulative impacts, it will be the first in a series of piecemeal wind energy projects that will destroy the entire valley area, viewsheds, local and regional/intermountain West wildlife populations and habitats, rare plants, cultural settings, and many other important values of the public lands. The Spring Valley Project's deficient EA is highly significant in opening the door to the massive industrialization of this remote, beautiful, biologically critical and very fragile area. Thus, it sets a precedent for large-scale future actions with dire effects to the valley and the biota that inhabit it.	Chapter 4 of the Preliminary EA summarizes the relevant impacts from the Wind PEIS and describes the site-specific direct, indirect, and cumulative impacts of the proposed action and alternative action based on data collected, and field inventories conducted specific to the project area. The reasonably foreseeable wind energy projects in Spring Valley are described in the analysis of cumulative impacts in Chapter 5. The BLM is not making a decision on future actions in this EA, only the proposed Spring Valley Wind Facility. Consideration of all future actions on BLM lands in Spring Valley will be subject to additional site-specific NEPA analysis.

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Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
94	26	NEPA	41	6	Alternatives that examine Wind Project site in the Nevada landscape based on minimizing volant species impacts must be examined. Why has BLM not required this be done?	The BLM elected to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American conflicts. An analysis of both action alternatives, as well as the No-Action Alternative is presented in Chapter 4 of the Preliminary EA.
72	26	NEPA	41	6	The Alternative Development Alternative is not much of alternative at all, and there is not valid alternatives analysis. There is no valid range of alternative actions, either such as analysis of effectiveness of mandatory shut-down of the facility for 6 moths out of the year to protect rare bats and birds. April - September	The BLM elected to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American conflicts. An analysis of both action alternatives, as well as the No-Action Alternative is presented in Chapter 4 of the Preliminary EA. Additionally, turbine shutdowns are included as a mitigation described in Appendix F - Avian and Bat Protection Plan, of the Preliminary EA. Starting in phase II, there can be up to 15,000 turbine hour shutdowns to mitigate for potential avian and bat mortalities. This goes up to 37,500 turbine hours shutdown in phase V.
22	26	NEPA	41	6	It states that there will be an increasing demand for energy. Yes, there may be - but right now demand is down - providing ample time for responsible siting and sound conservation of natural resources. Page 4 describes "production and transmission of energy in an environmentally sound manner". It is not environmentally sound to site a massive industrial facility in a remote desert valley right next to bat caves used by millions of bats. It is not environmentally sound to seek "greenfields" siting, when mine, weedland and other "brownfields" sites are available, or siting closer to where any power will be used will help conserve energy and minimize or reduce impacts to highly sensitive areas.	Wind energy facilities must be located where there is potential for wind, and cannot be limited to existing "brownfield" sites. The Ely RMP identified this part of Spring Valley as having wind energy potential. Although the analysis of alternatives is not required for an Environmental Assessment, the BLM did elect to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American resources. The Preliminary EA discloses the potential adverse impacts of each alternative to a range of resources, however, the alternatives are both located 4 miles from Rose Guano Cave, the site layout for both alternatives takes advantage of existing transmission infrastructure, and the alternatives would only result in the long-term ground disturbance of 111 acres, or 1.3% of the project area. In addition, the Preliminary EA includes extensive Resource Conservation Measures and Mitigation measures to further reduce potential impacts.
21	26	NEPA	41	6	The purpose and need are self-serving, and must be expanded an a reasonable range of alternative actions considered - such as siting closer to the places power will be used, brownfields siting, and other reasonable alternatives.	As stated in Section 6.2 of the BLM NEPA Handbook: "...the purpose and need statement be brief, unambiguous, and as specific as possible." The purpose and need statement for the Spring Valley Wind Energy Facility is consistent with existing decisions, policies, regulations, and laws including the Ely BLM RMP/ROD, Executive Order 13212, and the State of Nevada Renewable Portfolio Standard.
17	26	NEPA	41	6	There has been plenty of time to examine reasonable alternatives for siting of wind facilities, and for BLM to conduct necessary planning that focuses on alternative sites these facilities in disturbed sites, brownfields sites like mines, or areas that are weedlands.	Wind energy facilities must be located where there is potential for wind, and cannot be limited to existing "brownfield" sites. The Ely RMP identified this part of Spring Valley as having wind energy potential. Although the analysis of alternatives is not required for an Environmental Assessment, the BLM did elect to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American conflicts. In addition, the site layout of both alternatives would only result in the long-term ground disturbance of 1.3% of the project area.
23	26	NEPA	41	6	There is no comparison of how much energy will be lost in transmission to Los Angeles/CA where the power is to be used. Wouldn't a wind project actually supply a lot more power if it were sited in the area where the power is to be used, plus have a smaller carbon footprint? Aren't there new SWIP and other powerlines that go by much less sensitive areas? Why are alternatives, including weedlands or areas of low biodiversity closer to the southern SWIP area not being considered? That way, there also will not need to be another power line built, and power line sprawl occur, as development destroys that are to the north in SV, as well.	Spring Valley Wind has entered into a power purchase agreement with NV Energy, not an out of state utility. Additionally, an existing transmission line passes through the center of the proposed Spring Valley Wind Facility. The proposed Spring Valley Wind Facility is located in an area of adequate wind potential with direct access to existing transmission.
20	26	NEPA	41	8	See http://www.elp.com/index/from-the-wires/wire_news_display/1231683873.html . This article say this assessment is for the next "wave" of projects. However, in the case of SVW, WWV specifically raised the issue of brownfields, mine, weedland other alternative siting in comments on the previous deficient SVW Wind EA, and it must be fully considered in an EIS for the SVW Project.	The study referenced in the comment is outside the scope of this project. The BLM has a need to respond to the ROW application submitted by Spring Valley Wind for the proposed wind energy facility. Wind energy facilities must be located where there is potential for wind, and cannot be limited to existing "brownfield" sites. The Ely RMP identified this part of Spring Valley as having wind energy potential.
15	26	NEPA	42	6	ALL of this proposed or foreseeable haphazard "renewable" development is moving forward without any sound or integrated planning to minimize adverse impacts to biological, cultural, scenic/recreational, watershed/aquifer effects. Plus, there has been no planning or analysis that examines the severity of the losses of the ecosystems to buffer climate change effects if haphazard renewable sprawl is allowed to occur in wild lands, rather the brownfields, weeded areas, or other already highly degraded sites. The full direct, indirect and cumulative effects of all of this massive industrialization with wind facilities, transmission lines and likely several hundred more miles of roads in this fragile landscape must be examined in an EIS for Spring Valley Wind. The SVW Project, if this deficient EA is allowed to stand, represents the first step in the destruction of the valley and its irreplaceable resources. What will the impact be on habitats and populations, and population viability, of Sage Grouse, Pygmy Rabbit, Golden Eagle, Ferruginous hawk, several species of rare bats, and a variety of migratory songbirds.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant."
19	26	NEPA	42	7	We also understand that if this project is built, the existing high voltage line that moves power to California will be "maxxed out". Thus an entire new major transmission line would be required for even a small project anywhere over the vast area served by the line. Yet aren't other projects too being considered in Utah and Nevada? Why is this type of essential info not provided, and foreseeable impacts revealed? What impacts will even more transmission lines have on Sage Grouse and other wildlife?	Spring Valley Wind has entered into a power purchase agreement with NV Energy, not an out of state utility. Additionally, an existing transmission line passes through the center of the proposed Spring Valley Wind Facility and NV Energy has determined there is adequate capacity. The need for additional transmission is discussed in the cumulative impacts section of the EA (Chapter 5).

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14	26	NEPA	42	7	We understand that Ely BLM has mapping and other information in hand that shows the magnitude of proposed wind, water storage pump, plethora of transmission lines, and other features planned across the District. All such mapping should be part of the Spring Valley file, and provided to the public in the necessary EIS here.	Figure 5.0-1 of the Preliminary EA shows the reasonably foreseeable future projects within the geographic scope of analysis. The figure has been revised to show Transmission Corridors. Any additional data can be obtained directly from the BLM Ely District Office.
10	26	NEPA	42	8	How will all of Ely BLM's various deforestation schemes in the Spring Valley, Antelope and other watersheds increase and amplify soil erosion and dust storms, site heating, dust deposition events that may threaten rare plants or spawn more weeds, events, and potential micro-site changes in winds and weather? How will all of the U.S. Forest Service's burning, chopping, masticating, and other schemes in the Schell Creek Range further stress native biota, diminish habitat for migratory birds, and potential alternative foraging habitat for rare bats?	These issues are outside the scope of the Spring Valley Wind Facility project.
13	26	NEPA	42	9	The cumulative impacts analysis is greatly deficient, and fails to properly examine risks to rare and sensitive species, habitats, recreational uses, watersheds, and other threatened values.	The cumulative impacts analysis has been revised to provide more detail on the incremental impacts of the past, present, and reasonably foreseeable future actions and how the proposed Spring Valley Wind Facility contributes to them for each of the resources analyzed.
18	26	NEPA	45	6	Ely BLM continues to err in trying to push an EA and FONSI through for this environmentally devastating project. Yet the Interior Department has recently touted conducting a rapid assessment for suitable energy siting. A viable alternative here is to wait until that planning is done, and determine if siting the plant in another make ecological, scenic, societal, and economic sense.	An assessment of the site has already been completed. The Ely BLM Resource Management Plan (2008) identifies Spring Valley as having high wind energy potential. The proponent, Spring Valley Wind LLC, has conducted two years of wind potential studies and has determined that it is a suitable site for wind energy development. The BLM has required site-specific data collection and field inventories of biological, cultural, and visual resources for the project. The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant."
95	26	NEPA	46	6	BLM cannot rely on the Wind PEIS, as it does not adequately address highly significant concerns with this ill-sited project, and the high degree of controversy surrounding this siting.	The BLM does not rely solely on the Programmatic Wind EIS. The Preliminary EA appropriately tiers to the PEIS and provides site-specific analysis based on data collected specifically for the Spring Valley Wind project.
25	26	NEPA	46	6	Even basic info on the wind facility and components including potential harmful substances, is not yet provided. Geotechnical studies are not yet all completed (EA at 8).	A safety plan will be developed and implemented as part of the COM plan. Remaining geotechnical studies would be necessary to finalize foundation designs and are not necessary to determine potential impacts of the proposed Wind Energy Facility.
91	26	NEPA	46	6	It is an outrage that the proponent gets veto power over "additional curtailment". This whole section interdependent actions is highly uncertain, overly complicated, and cannot be accepted. This risks to irreplaceable wildlife is too great. The bottom line is : The BLM must select the NO Action alternative. We also stress that the EA failed to provide adequate data and analysis for evaluation of the No Action alternative. No "hard look" was taken.	Phase I mitigation described in the Avian and Bat Protection Plan includes cut-in speed curtailment for the equivalent of 62 days per year, 12 hours per day. These times increase with each additional phase, although increases within one year would require proponent approval. The Preliminary EA describes the site-specific impacts to potentially effected resources and includes and alternative that avoids sensitive resources, as well as extensive resource conservation measures and mitigations to limit unavoidable adverse impacts. The analysis is based on the best available data available including site-specific data collected on Avian and Bat Species associated with the project area, 100% coverage cultural resource inventories, hydrology studies, and visual contrast analysis. The BLM NEPA Handbook states, "If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the 'significance' of environmental impacts; it provides a basis for rational decision making."
77	26	NEPA	46	6	The attempts to place overwhelming emphasis on the now-outdated Wind PEIS. Significant new scientific info about adverse effects on biological resources, humans and human health, and the toll taken on resources from wind facility and apparatus manufacture and placement is now known. For example, the Wind PEIS allows placement of MET towers under minimal NEPA - despite the fact that that placement of MET towers may significantly lessen grouse use of any area - thus ruining any valid biological baseline or understanding of wind facility impacts. In fact, this may be the case here. Plus increased scientific info on the effects of noise, how wind turbines kill bats or other volant species, flicker effect, fires caused by turbines, toxic materials used in and mined for turbines, the large-scale losses in sagebrush and other wildlife that now have heightened concerns over species endangerment, and much other significant new info is now available. BLM must also consider the growing outcry from human residents exposed to industrial wind farm noise and other effects as these facilities have been built in inappropriate places. The laundry list of Wind PEIS BMPs are now known to be greatly inadequate to protect rare native biota, plus they are not binding, and time after time are termed as "should", not the binding "shall".	The BLM does not rely solely on the analysis in the Programmatic Wind EIS. The preliminary EA appropriately tiers to the PEIS and provides site-specific analysis based the best available information on wind energy technology, recent studies, and on data collected specifically for the Spring Valley Wind project.

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55	26	NEPA	46	6	The EA forsakes the necessary "hard look" under NEPA. It basically punts to the future - expecting the public to have blind faith in highly uncertain adaptive management, mitigation, and monitoring. BLM ignores the severity of impacts. BLM cannot authorize this project based on minimal data on the majority of biological, cultural, visual, recreational, aquifer/watershed - and other resources. It is absurd for a company (SVW Pattern Carlyle Group) to be allowed to invest several hundred million dollars - or a billion - or more - and not have solid upfront data to determine of the impacts will be biologically unacceptable.	The Preliminary EA describes the site-specific impacts to potentially affected resources and includes an alternative that avoids sensitive resources, as well as extensive resource conservation measures and mitigations to limit unavoidable adverse impacts. The analysis found in Chapter 4 of the Preliminary EA is based on the best available data.
78	26	NEPA	48	6	Mitigation is greatly inadequate. Mitigation by avoidance has been wrongly discarded. The EA relies on programmatic mitigation measures with no proof that they will alleviate impacts to any significant degree. Since there is no valid Baseline, the full degree and severity of effects, and the degree of necessary mitigation, cannot be understood and properly applied.	Project mitigations are included to reduce adverse impacts before operations begin and to respond to incidents as they occur after operations begin. Mitigations from the PEIS and the BLM Ely RMP are included as well as project-specific mitigations and Resource Conservation Measures described in Section 2.1.4 of the Preliminary EA. Avoidance measures were implemented in site layout and as part of the alternative action. Monitoring will evaluate the effectiveness of mitigation measures and allow for changes to occur as necessary to ensure impacts do not reach a level of significance.
56	26	NEPA	48	6	The Project's programmatic and site-specific mitigation and adaptive management will never be adequate to prevent or address severe impacts where they occur. It is an outrage to expect U.S. taxpayers to provide stimulus funds to finance/subsidize a likely biological disaster. This is highly controversial, as well.	Project mitigations and the Avian and Bat Protection Plan (ABPP) are included to reduce adverse impacts before operations begin and to respond to incidents as they occur after operations begin. Mitigations in the ABPP would be based on species-specific mortality thresholds and include the ability to shut down turbines for a maximum of 37,500 turbine hours.
33	27	NEPA	10	7	Any post-construction monitoring reports that includes wildlife, cultural, and water resources must be provided to the CTGR for review and comment, as it is critical for our tribe to be informed of the continued impacts or restoration that affect our people.	Any monitoring reports prepared will be available directly from the BLM Ely District Office.
1	27	NEPA	40	6	The Confederated Tribes of the Goshute Reservation feels that a decision to prepare an EIS at this point is required because the project stands to have significant impacts on the human environment, Executive Order 13212 requires that new energy development be accomplished in a safe and environmentally sound manner for the well-being of society, and similar-sized projects have required EISs rather than EAs.	The analysis in the SVWEF EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The Preliminary EA also identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts. Other similar wind projects have also been approved by the BLM based on analysis in an Environmental Assessment tiered to the Wind PEIS, such as the Milford, Utah, wind project.
25	27	NEPA	41	6	Design and layout alternatives for the SVWEF are essentially not part of this Draft EA, but must be included given the high-level impacts on cultural and wildlife resources that are likely to occur.	The Preliminary EA includes an alternative layout for analysis. The BLM will consider the impacts of each of the alternatives before selecting a final preferred alternative in the Final EA.
26	27	NEPA	41	6	The USFWS provided several guidelines in 2003 to avoid or minimize impacts to wildlife from wind turbines, including avoidance of habitat fragmentation, placement of energy facilities on previously disturbed lands rather than on healthy native habitats, placement of wind turbines <5 miles from sage grouse lek sites, avoid designs that encourage wildlife use for roosting or nesting or perching, and placement of electrical transmission lines underground. While the CTGR can appreciate that several design features reduce wildlife perching, roosting, or nesting, several design feature for the SVWEF are still needed to avoid impacts. We suggest the following at a minimum: 1) decrease the width of roads to the minimum possible and place wider sections of road only where absolutely necessary; 2) place electrical transmission lines underground; 3) place turbine pads and WTG on land areas that have been previously disturbed from grazing, fire, or otherwise; 4) use the minimum possible amount of water from local surface, spring, and groundwater sources.	In response to your comments: 1) as described in Section 2.12.1.2.6 of the Preliminary EA, permanent road width would only be 28 feet; 2) as described in Section 2.1.1.2.7 of the Preliminary EA, the 34.5-kV collector system would be installed underground and the project would connect to an existing transmission line; 3) as described in Section 2.1.1.1 of the preliminary EA, only 0.3% of the 8,565-acre project area would be disturbed by the turbine pads; 4) as described in Section 4.5.2.2.1 of the Preliminary EA, only 15.3 to 30.7 total acre feet of water would be necessary for construction (0.44% of the total annual groundwater discharge in Spring Valley). Water use during operation would be limited to dust control.
2	27	NEPA	46	6	The BLM has failed to carefully evaluate all potential environmental impacts of the proposed project, and the CTGR has found that: Cultural resource impacts will be greater than what is stated in the Draft EA; Visual resource impacts will be greater than what is stated; Wildlife resource impacts will be greater than is stated; Project alternatives (including design/layout alternatives) are not sufficient; and Mitigation measures are not sufficient for cultural, visual, and wildlife impacts.	The EA presents the anticipated environmental consequences based on best available data, including site-specific data collected for wildlife, cultural inventories, and visual contrast analysis. The EA also includes extensive resource conservation measures in Section 2.1.4 and mitigation measures in Chapter 6.
7	27	NEPA	46	9	Impacts from construction, operation and maintenance of the SVWEF on cultural and spiritual resources under both the Proposed Action and the Alternative Development Alternative are overly vague and nonspecific to particular resources.	Sections 4.6 and 4.7 of the Final EA have been revised to include more detailed information specific to the project location and the site-specific consultation, studies, and inventories completed regarding cultural resources and Native American religious concerns.
27	27	NEPA	48	6	SVWE proponents should be required to submit to the BLM, and the public, plans that adhere to the above mitigation measures and the CTGR should have the opportunity to comment and review those plans to make sure that cultural, spiritual, and wildlife resources have the best possible mitigation and protection.	All plans prepared to address specific resource concerns were made available to the public as appendices to the Preliminary EA during the public comment period.

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7	28	NEPA	40	6	NEPA requires federal agencies to prepare an EIS for all "major federal actions significantly affecting the human environment." 42 U.S.C. §4332(2)(C). To avoid preparing an EIS, an agency must make a FONSI after preparing an EA. See 40 C.F.R. §§1501.49(c), 1508.9. An EA must contain sufficient information and analysis to determine whether the proposed action is likely to have significant impacts, thus requiring preparation of an EIS. See 40 C.F.R. §1508.9. "If the agency... opts not to prepare an EIS, it must put forth a 'convincing statement of reasons' that explain[s] why the project will impact the environment no more than insignificantly." Ocean Advocates v. U.S. Army Corps of Eng'rs, 402 F.3d 846, 864 (9th Cir.2005). "[A]n EIS must be prepared if substantial questions are raised as to whether a project may cause significant degradation of some human environmental factor." Wetlands Action Network v. U.S. Army Corps of Engineers, 222 F.3d 1105, 1119 (9th Cir. 2000).	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment (EA) is tiered to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The Preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
2	28	NEPA	40	6	Unmitigated impacts to sage-grouse and visual resources, even under the Alternate Development Alternative, have the potential to cause significant impacts and require the preparation of an EIS.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant." In addition, Section 6.8.4 of the BLM NEPA Handbook states in part, "Mitigation measures can be applied to reduce or eliminate adverse effects to biological, physical, or socioeconomic resources. Mitigation may be used to reduce or avoid adverse impacts, whether or not they are significant in nature." The PEA has proposed mitigation as found in Chapter 6.
4	28	NEPA	42	6	SNWA has no objection to the development of wind energy projects per se, but does have concerns with the National Environmental Policy Act ("NEPA") evaluation process, including commensurate with requirements on other projects.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative.
6	28	NEPA	42	7	Review/approval of the wind energy project should not unduly affect other projects proposed in Spring Valley, including SNWA's GWD Project. In particular, SNWA supports BLM's implementation of the Alternate Development Alternative as its final decision. The alternative will provide greater protection to wildlife resources than the originally proposed action and reduce noise impacts to SNWA's staff and contractors living at the Bastian Creek Ranch.	The BLM will evaluate all impacts of the alternatives before selecting a final preferred alternative.
22	28	NEPA	42	9	SNWA's GWD Project is identified as one of the reasonably foreseeable actions that will result in further mortality to bats. Draft EA, at 137. As SNWA made clear in its comments on the December 2009 Draft EA, the GWD Project pipelines will be buried and are not anticipated to cause impacts to bats. SNWA Letter to Mr. McGiffert, BLM Ely Field Office, Comment 70 (Jan. 14, 2010). The analysis should be revised to reflect this fact.	The final EA has been revised. The reference to SNWA's GWD Project has been removed from the reasonably foreseeable future actions in Section 5.2 - Special Status Species when describing cumulative impacts to bats.
20	28	NEPA	42	9	The cumulative impact analysis for individual resources identifies impacts on the basis of the amount of SNWA's GWD Project's land disturbance, but fails to describe the connection between the quantity of land disturbance and the actual resource impact. For example, under Chapter 5.8 Noise, Draft EA at 141, the development of 462 acres as part of the SNWA GWD Project is identified as contributing to an increase in noise levels, but the analysis does not describe how that quantity of land disturbance actually contributes to noise.	Chapter 5 - Cumulative Impacts analysis in the final EA has been revised to better define the connection between a project and a resource impact for each of the individual resources.
1	28	NEPA	46	6	SNWA's primary concern remains that the EA is inadequate to support a finding of no significant impact ("FONSI").	The Preliminary EA identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts to a less than significant level. If it is unclear whether the action would have a significant effect, an environmental assessment should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making."
5	28	NEPA	46	6	SNWA has no objection to the development of wind energy projects per se, but does have concerns with the National Environmental Policy Act ("NEPA") evaluation process, including to reduce potentially significant environmental impacts.	The Preliminary EA identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts to a less than significant level.
3	28	NEPA	48	6	SNWA has no objection to the development of wind energy projects per se, but does have concerns with the National Environmental Policy Act ("NEPA") evaluation process, including development of adequate mitigation measures.	The Preliminary EA identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
1	29	NEPA	40	6	Using an EA for a large scale wind energy project, whether or not there is a PEIS, is a clear violation of NEPA. A wind energy project of this scale, covering 8,500 acres, is a major federal action and will entail significant impacts. These include ground disturbance associated with construction, water resources impacts, impacts to birds and bats, cultural resource impacts, and others. Sierra Club strongly disagrees with using an EA for any large scale renewable energy project, whether or not it is a "fast track" project.	The analysis in the SVWEF EA tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS and a project specific EIS is not required. Section 5.2.2 of the BLM NEPA Handbook states: "Tiering to the programmatic EIS would allow the preparation of an EA and FONSI for the individual action, so long as the remaining effects of the individual action are not significant." If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
5	29	NEPA	40	6	We strongly disagree with the Finding of No Significant Impact and insist that the BLM undertake a full EIS in order to comply with the requirements of NEPA.	The BLM has released the unsigned draft FONSI for public comment consistent with Section 8.4.2 of the BLM NEPA Handbook H-1790-1. In addition, If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)).The BLM is consistent with the requirements of NEPA and of the BLM NEPA Handbook by preparing an Environmental Assessment that tiers to the Programmatic Wind EIS. As the BLM Handbook describes in Chapter 8, "An environmental assessment is a tool for determining the 'significance' of environmental impacts; it provides a basis for rational decision making."
11	29	NEPA	41	6	Among the alternatives should be other sites on public land, particularly one much farther from the Rose Guano Cave, as well as a distributed generation alternative.	Alternate project locations were considered as described in Sections 2.5.1 and 2.5.2 of the Preliminary EA. The project area is currently 4 miles from Rose Guano Cave. An alternate location farther from the cave would not necessarily reduce potential impacts to the Brazilian free-tailed bats, and may result in greater impacts to other resources such as greater sage-grouse resulting from the need for a new transmission line to be installed. A distributed generation alternative would not meet the purpose and need for action. Additionally, the BLM does not have the authority to make a decision on distributed generation.
10	29	NEPA	41	6	The EA does not comply with NEPA requirements for a full range of alternatives. An EIS should list at least three more alternatives. The Alternative Development Alternative still would disturb the hydrological resources of the Swamp Cedars Area of Critical Concern, disrupt connectivity for pronghorn antelope, remove habitat for the sage grouse and pygmy rabbit, still kill many raptors and passerines, and still potentially destroy the population of Mexican free-tail bats in the Rose Guano Cave. We are surprised that the EA fails to identify an alternative in a different location, as this is a clear requirement of NEPA.	The BLM elected to include an alternative for analysis to address potential conflicts with sensitive biological, cultural, and Native American conflicts. An analysis of both action alternatives, as well as the No-Action Alternative, is presented in Chapter 4 of the Preliminary EA. Additionally, turbine shutdowns are included as a mitigation described in Appendix F - Avian and Bat Protection Plan, of the Preliminary EA. Starting in phase II, there can be up to 15,000 turbine hour shutdowns to mitigate for potential avian and bat mortalities. This goes up to 37,500 turbine hours shutdown in phase V.
3	30	NEPA	40	6	The park believes that an environmental impact statement (EIS) should be prepared.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative. If it is unclear whether the action would have a significant effect, an environmental assessment (EA) should be prepared (40 CFR 1508.9(a)). An environmental assessment is a tool for determining the "significance" of environmental impacts; it provides a basis for rational decision making.
16	30	NEPA	40	6	GRBA continues to believe, as has been noted in this and our letter of June 11, 2010, that a FONSI is not justified and that the preparation of an EIS to adequately analyze, minimize, mitigate and disclose the full impacts of this and future projects in the area is required. While Federal regulations might allow the release of a draft FONSI prior to public comments on the EA, as it appears to predispose the final outcome of the environmental assessment.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment (EA) is tiered to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The Preliminary EA also identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts to a less than significant level. The BLM has released the unsigned draft FONSI for public comment consistent with Section 8.4.2 of the BLM NEPA Handbook H-1790-1.
15	30	NEPA	42	6	The cumulative impact of all reasonably foreseeable actions in Spring Valley will total over 30,000 acres affected and is likely to significantly impact natural and cultural resources on lands administered by the National Park Service. The cumulative impacts of what appears to be the industrialization of Spring Valley have not been adequately analyzed nor disclosed in this EA. GRBA recommends that the BLM require the preparation of an EIS containing all reasonably foreseeable actions proposed for Spring Valley.	The proposed project occurs entirely on lands managed by the BLM Ely District Office, and there would be no direct change to natural and cultural resources on lands administered by the National Park Service. The preliminary EA does disclose the indirect impacts to the landscape and setting adjacent to the Great Basin National Park and impacts to its visitor that would occur as a result of the proposed project. Table 5.0-1 of the cumulative impacts analysis summarizes the past, present, and reasonably foreseeable future actions that are considered for cumulative impacts. The reasonably foreseeable future actions considered in this EA are those that are in planning stages with a reasonable expectation of occurring over the anticipated life of the project.
1	30	NEPA	46	9	The park provided written comments to your office on January 4, 2010 and June 11, 2010 relevant to this project. While the EA addresses many of the issues raised, the park believes the document still does not adequately disclose impacts to park resources and values including views; night skies; cultural resources; biological resources; and the cumulative impact of additional projects.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative. Additionally, an analysis of dark skies has been completed and included in the EA.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
2	30	NEPA	48	6	The park believed that a FONSI is not justified, additional mitigation measures are warranted.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment (EA) is tiered to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The Preliminary EA also identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts to a less than significant level.
1	31	NEPA	40	6	We refer to and re-state our objections submitted January 15, 2010 and note that second EA has not adequately addressed the proximity of federally designated and protected national park land, nor the value of views the Spring Valley WGF will have on approach and from within the park, nor the area's notable dark sky resources. NPCA notes that these salient points have not been addressed in the Preliminary EA, and urges the Bureau of Land Management to prepare an Environmental Impact Statement, based on NEPA requirements that an EIS must be prepared if a proposed project has potential to cause significant environmental impact and if significant controversy exists. In this case, we believe both occur.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. Sections 4.8.2.3 and 4.8.3.2 of the Final EA have been revised to incorporate a site-specific analysis of the effect of the alternatives to the dark sky resources of the National Park. The Preliminary EA also identifies extensive resource conservation measures in Section 2.1.4.3 and mitigation measures in Chapter 6, including all those measures identified in the BLM Wind PEIS that would be required to reduce potential impacts to a less than significant level.
9	34	NEPA	10	9	7.2 Persons, Groups, and Agencies Consulted: The Ely Shoshone Tribe is not listed.	The Ely Shoshone Tribe has been added to Section 7.2 of the Final EA.
11	34	NEPA	40	7	This project needs to move to an EIS because there are missing elements to the EA.	The analysis in the Spring Valley Proposed Wind Energy Facility Project Preliminary Environmental Assessment tiers to the BLM Wind Energy Development Programmatic Environmental Impact Statement consistent with the BLM's National Environmental Policy Act Handbook H-1790-1 and IM 2009-043 on implementing the Wind PEIS. The preliminary EA provides site-specific detailed analysis of the impacts of the proposed action and alternative.
9	21	NO	11	7	Large wind turbines can cause noise.	The impacts of noise from Wind Turbine Generators are described in Section 4.9 of the Preliminary EA.
54	26	NO	11	6	Again here, where is the site specific data over all seasons of the year and all weather conditions? How will turbine and all other project noise increase these levels? What will be the adverse effects on biological. Cultural and recreational uses?	The impacts of noise from the construction and operation of Wind Turbine Generators are described in Section 4.9 of the Preliminary EA. The impacts of noise on wildlife are described in Sections 4.2.2, 4.2.3, 4.3.2, and 4.3.3 of the Preliminary EA.
81	26	POD	12	6	How does military chaff interfere with radar? Does dust interfere with radar? Does military training occur over this airspace, and if so may that in any way (other than discharge of chaff) interfere with radar? Also note that chaff may drift considerable distances from where it is discharged. There are far too many criteria to be met before any real action occurs. See Appendix F - If the radar system is used, "any time the ... system detects a group of birds or bat activity (determined through a year of radar studies) within approximately 1/4 mile of the project area coupled with low visibility for birds. This means: Tremendous mortality can occur for a full year without anything happening. The distance is much too close - especially given the high speeds, wind speeds, etc. that this area may experience. Why is there a whole combination of events? Why isn't just one of these a trigger to shut the whole ill-sited facility down. This whole system is fraught with uncertainty - it appears that there is no certainty how far out species will be detected.	Chaff is a countermeasure used by military aircraft that acts as decoy for radar. Chaff is used within Military Operations Area (MOA) during training exercises, which would be an infrequent occurrence over Spring Valley. The Avian and Bat Protection Plan includes adaptive management techniques to ensure that potentially significant levels of mortality from the Spring Valley Wind Facility are effectively mitigated. The Radar and Curtailment program are only one element of possible mitigation. In the event that mortality thresholds are exceeded, additional mitigation phases (including turbine shutdowns) may be implemented; there would be no year-long waiting period.
26	26	POD	12	6	Impacts of the host to determine how tall these towers will be? Will they all be 400 foot tall towers? How many will be? What height of tower was used in the visual analysis? How do noises differ between tower type/size/height? Are there differing biological impacts with different tower heights? If so, what are they? How does this affect any monitoring or mitigation? What is tower visibility (all types of foreseeably used towers) from leks? Wintering areas?	There would be 75 Wind Turbines installed under each alternative. Each turbine would be up to 418 feet tall including the turbine rotors. Section 3.1 of the Visual Resource Assessment describes the number and height of turbines used for the Visual Simulation. Section 4.8 of the Preliminary EA provides a description of the impacts to visual resources from both alternatives. Section 4.9 of the Preliminary EA provides a description of the impacts from noise.
6	29	POD	12	6	The EA implies that the overall footprint of the project would be less than significant because of a total of "448 acres of disturbance". This statement is misleading from an ecological perspective and does not reflect current scientific understanding of ecological processes. New roads, electric lines, substations, underground electrical collection systems, etc. will be obstructions to wildlife habitat and connectivity in this region. Further, impacts to birds and bats, if in migratory corridors, can be many magnitudes higher than even the full acreage of 8,500 acres.	The preliminary EA does not limit its description of impacts to the direct loss of acreage from the proposed Spring Valley Wind Facility. In addition to quantifying the direct loss of habitat associated with the proposed action and alternative action, the impacts of invasive species, risks of mortality, erosion and runoff, noise, and interference with behavioral activities are described for wildlife species in Sections 4.2 and 4.3.
3	33	POD	12	7	The link didn't show very much information, but did state that they would use an existing transmission line. In case they determine that additional transmission or distribution lines might be needed I'd like to note that only transverse crossing, with poles and other appurtenances being located outside NDOT R/W, are routinely approved as encroachments. Also, any overweight/over dimensional equipment and supplies needed for construction or operation will require the appropriate NDOT permit.	Comment noted.
22	14	REC	51	6	We believe that the preservation of this open space for scenic value and wildlife preservation has a more sustainable recreational value to the community and other public land owners than a wind project that will produce a questionable amount of energy and create so few jobs in the long run. If the project is developed, how much public land would be off limits to the public?	Less than the overall footprint of the project, or approximately 100 acres, would be off-limits to the public during operations. The access roads associated with the project would be open to the public during operations. There would be no loss of developed recreation sites or trails as a result of the project. The entire project area is only 1% of the Game Management Unit defined by NDOW.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
9	16	REC	50	9	The FONSI downplays the context of this project by stating that it is in a sparsely inhabited area and that the primary economic activities are ranching and mining. The project is neighbor to the Great Basin National Park, an area valued for its remoteness, primitive recreational experiences, and scenic vistas.	The context section of the FONSI has been revised to describe the proposed project's proximity to the Great Basin National Park.
32	27	REC	13	8	OHV impact on wildlife and cultural resources can be substantial and the CTGR encourages any restrictions and prohibitions of OHV activity near the proposed project site.	OHV use on BLM land is determined through the BLM RMP and is currently limited to designated roads and trails in Spring Valley.
2	19	RN	14	7	Grazing in this part of the country is not ideal and should not be a major consideration when making a renewable energy determination.	There would be no reduction in AUMs on grazing allotments in the project area as a result of the proposed action.
21	28	RN	57	9	Under Chapter 5.3, Grazing Uses, Draft EA at 138, the entirety of SNWA's GWD Project disturbance is described as disturbing the Majors and Bastian Creek grazing allotments. Only a part of SNWA's Spring Valley lateral overlap with those grazing allotments, and this statement should be corrected to reflect that amount of disturbance.	The acreage associated with the SNWA GWD project within the two grazing allotments has been revised to reflect the correct amount of disturbance in Section 5.3 of the Final EA.
45	16	TRAN	15	7	The EA envisions a network of up to 27.8 miles of access roads, taking up 95 acres of currently undisturbed land, for the operation and maintenance of the proposed wind facility. Road disturbances may be up to 68 feet wide during the construction phase, and the EA states that they would be reduced to 28 feet wide, including ditches, after construction is completed. The Center has several concerns regarding this travel network. First, the final width of 28 feet seems excessive and the Center suggests that lateral roads be constructed to single-lane with turnout standards to minimize the long term disturbance and impacts.	All project roads incorporate existing BLM standards regarding road design, construction, and maintenance as described in the 2005 PEIS/ROD (BLM 2005).
47	16	TRAN	15	8	The EA envisions a network of up to 27.8 miles of access roads, taking up 95 acres of currently undisturbed land, for the operation and maintenance of the proposed wind facility. Road disturbances may be up to 68 feet wide during the construction phase, and the EA states that they would be reduced to 28 feet wide, including ditches, after construction is completed. The Center has several concerns regarding this travel network. There is no mention of if off-road vehicle use will be prohibited or discouraged. The Center requests that all wind facility roads be formally and legally closed to public travel and that appropriate measures be incorporated into the facility design to facilitate this restriction. Off-road use is inappropriate given the critical nature of the area to sage grouse, pygmy rabbit, and pronghorn antelope (crucial winter habitat).	OHV use on BLM land is determined through the BLM RMP and is currently limited to designated roads and trails in Spring Valley.
7	16	TRAN	15	9	The FONSI downplays the context of this project by stating that it is in a sparsely inhabited area and that the primary economic activities are ranching and mining. It neglects to mention that the project lies aside a major U.S. highway that is a National Heritage Route.	The context section of the FONSI has been revised to describe the proposed project's proximity to U.S. Highway 50. A description of the Great Basin National Heritage Area has been included in Section 3.6 of the Final EA.
15	17	TRAN	15	6	There will be 28.7 miles of new roads constructed within the project area. The BLM needs to address the long term effects of increased public access across this area and to the western edge of the ACEC created by these roads.	Section 4.6.1.1 of the Preliminary EA summarizes the Wind PEIS and states: "Other indirect impacts include increased access to the area, which could result in looting, vandalism, and inadvertent destruction of cultural resources."
5	26	TRAN	15	7	The construction of 28 miles of road in this fragile desert valley in and of itself clearly necessitates an EIS. There will be severe soil, microbiotic crust, native vegetation, wildlife habitat and other loss and disturbance in this action alone.	95 acres, or 1.1% of the project area would be disturbed from long-term access roads associated with the project. This is a negligible amount of disturbance relative to the project area and to the Spring Valley Watershed.
2	33	TRAN	15	7	The proposal indicates that an access/haul road will be constructed across this NDOT material site right of way. Permission to construct an access road across the material site NEV055079 will probably require permission and coordination with the NDOT Right of Way Division. Please contact Halana Salazar at (775)888-7470	All necessary permits will be obtained prior to a Notice to Proceed being issued.
2	3	VR	36	6	We are concerned about the lighting systems on the turbines throughout the project and how that will affect the peace and solitude presently in the valley that we and other plan to live.	A description of the impacts to night skies is included in Sections 4.8.1.2, 4.8.2.3, and 4.8.4.2 of the Preliminary EA. A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA.
4	3	VR	36	7	We have found that there are lighting systems for wind turbines that are only activated when there are aircraft in the area, this seems like a reasonable upgrade that should be given some consideration.	Lighting is regulated by the Federal Aviation Administration. The FAA is in the process of approving that system but it is at a minimum of 6 months away from being approved and then the Federal Circular Advisory would need to be revised. If this lighting system is available by the time the project is installed, the applicant will look further into the feasibility of installing such system.
7	4	VR	35	9	It will have devastating impacts to the viewsheds of Great Basin National Park and Mt. Moriah Wilderness Area.	The impacts to visual resources are described in Sections 4.8.2, 4.8.3, and 4.8.4 of the Preliminary EA. A description of the views from Mount Moriah has been added to Section 3.8.1 of the Final EA.
1	9	VR	35	6	I am shocked at the proposed Spring Valley Wind Project, to be situated prominently in full view of Great Basin National Park. As you know the GBNP Act of 1986 specifically includes " the views of the surrounding lands from GBNP." The view into Spring Valley from all along the ridge of the South Snake Range is totally integral to the Park experience, and not at all confined to those who climb Wheeler Peak. Furthermore, visitors approaching from the west are invariably thrilled by wide, beautiful Spring Valley sweeping up to the intricate formations and profiles of the massive peaks of the Park. It is unthinkable to plant an industrial development at the foot of such magnificence.	The impacts to visual resources are described in Sections 4.8.2, 4.8.3, and 4.8.4 of the Preliminary EA. The visual aesthetics of the wind farm is subjective and as described in the EA Section 4.13.2.2, in at least some cases wind farms have led to increased visitation in areas.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
2	11	VR	35	6	In addition, the project conflicts with Nevada's only national park, whose unique and irreplaceable treasures include its viewshed, which would be compromised.	The impacts to visual resources are described in Sections 4.8.2, 4.8.3, and 4.8.4 of the Preliminary EA.
3	11	VR	36	6	In addition, the project conflicts with Nevada's only national park, whose unique and irreplaceable treasures include its dark skies, which would be compromised.	A description of the impacts to night skies is included in Sections 4.8.1.2, 4.8.2.3, and 4.8.4.2 of the Preliminary EA. As stated in Section 4.8.2.3: "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
5	14	VR	16	6	The project will also degrade the remote visual character of Spring Valley.	The impacts to visual resources are described in Sections 4.8.2, 4.8.3, and 4.8.4 of the Preliminary EA.
19	14	VR	16	8	Basin and Range Watch differs with BLM's designation of the site as only a VRM Class III area. As you may know, this part of Spring Valley was originally intended to be part of Great Basin National Park. Many people have commented on our website that they feel that Spring Valley is one of the most scenic and remote places left in the west because it is one of the most unspoiled basins left in Nevada. We believe that the BLM is misrepresenting the view of the public, by only designating the VRM for the area as "Class III".	The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008. Great Basin National Park was a cooperating agency on that Environmental Impact Statement.
20	14	VR	60	6	First, the Google Earth Key Observation Point Simulations are inadequate. There simulations do not capture lighting and actual features. A new Visual Resource Management Assessment should exclude all Google Earth Simulations. Second, the existing KOP simulations display a "lighting bias". KOP's 1, 2 and 3 should be broken down into 3 photos each, representing morning, afternoon, and evening. There should also be KOP's of the same views representing lighting and contrast from Summer and Winter seasons. At least 6 additional KOPs are needed: At least two KOP's should be provided from the Mt. Moriah Wilderness Area; At least one KOP should be provided from a scenic vantage point in the Schell Creek Range; At least one KOP should be provided representing the flashing red lights at night time; Two KOP's should be provided closer to the project with at least one taken from the Swamp Cedars Area of Critical Environmental Concern.	As described in Section 3.8.1 of the Preliminary EA, the primary public views of the project area are from travel routes and not from static observation points. KOP 3 is also representative of views from the Bastian Creek Ranch. Wheeler Peak is included because of its location within the park and greater sensitivity to changes in the landscape. The project is not visible from residences at Sacramento Pass, Cleve Creek Campground, Majors Junction. The five KOPs serve as representative viewpoints surrounding the project area. An assessment of the visibility of the project from the Mt. Moriah Wilderness and the Schell Creek Range has been added to Section 3.8.1
48	16	VR	16	8	A Visual Resource Inventory was conducted on behalf of the BLM for the proposed project area encompassing an 11-mile radius. Given the Congressional designations found within and adjacent to the proposed wind project, which emphasize and highlight the areas scenic and natural qualities and features, it is hard to rationalize how the BLM could derive a Level III management objective for the area. Class I objectives which "preserve the existing character of the landscape" and mandate that "change to the characteristic landscape should be very low and must not attract attention" and Class II objectives which "retain the existing character of the landscape" are far more appropriate classifications for an area this close to a national park that was established in part to preserve its "scenic values". The proposed project would instill a totally unnatural and industrial aspect into the landscape and viewshed that is currently not even remotely found there. The addition of this context, aside from and in addition to the raw visual intrusion of 400+ foot wind turbines and their associated infrastructure would seriously and significantly disrupt the current scenic qualities and experiences expected by visitors to the Great Basin National Park and travelers on the Highway 50 National Heritage Route.	The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008.
20	16	VR	35	6	The National Park Service, the National Park Conservation Association many users of the Great Basin National Park, myself among them, have grave concerns regarding the impacts to the primitive and backcountry experiences and values. These concerns arise from the visual impacts of the proposed project as seen from GBNP, including the glare off the towers and their blades.	The Preliminary EA does include a Key Observation Point from Wheeler Peak within the park to disclose impacts to the views from within the park. Glare from modern WTGs is minimized as a result of the non-reflective materials used for their fabrication.
8	16	VR	35	9	The FONSI downplays the context of this project by stating that it is in a sparsely inhabited area and that the primary economic activities are ranching and mining. The project is neighbor to the Great Basin National Park, an area valued for its remoteness, primitive recreational experiences, and scenic vistas.	The context section of the FONSI has been revised to describe the proposed project's proximity to the Great Basin National Park.
49	16	VR	60	7	In addition, the visual inventory and assessment are seriously flawed by including only one view point located in the park, that being the top of Wheeler Peak. There are numerous viewpoints of the proposed wind project along the Wheeler Peak Scenic Drive that should have also been evaluated, as they receive much more visitation than the peak itself.	There are no locations along the Wheeler Peak Scenic Drive where Spring Valley is visible.

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12	17	VR	35	6	The other "management plans" listed in Section 2.7 do not list the Great Basin National Park as a one considered. As quoted in the EA "GBNP was created by the Great Basin National Park Act of 1986 "in order to preserve for the benefit and inspiration of the people a representative segment of the Great Basin of the Western United States possessing outstanding resources and significant geological and scenic values, there is hereby established the Great Basin National Park." In addition to the outstanding scenery within the GBNP, the views of surrounding lands from GBNP contributed to the park visitors overall sense and understanding of the Great Basin. This KOP represents the views of visitors to the park, primarily those visitors climbing Wheeler Peak. The viewshed of GBNP is a vast area of largely undeveloped lands, almost 200,000 square miles of the Great Basin. Lands surrounding the GBNP are valleys and mountain ranges, including the Mount Moriah Wilderness to the north and the High Schells Wilderness to the west. The rugged horizon lines of those surrounding mountain ranges extend for miles to the north and south. The expansive valley floors are covered in tan, green, and gray grass and shrub lands, interspersed with darker green juniper trees. They are also crisscrossed with lighter toned dirt and paved roads and transmission lines. Visitors to the summit have clear panoramic views of the entire	The Great Basin National Park GMP is not included because it does not regulate actions on lands outside the park. The Preliminary EA does describe impacts to park resources including Visual Resources (Section 4.8), Noise (Section 4.9), Night Skies (Section 4.8), and Recreation (Section 4.12).
9	17	VR	35	6	Other issues include visual impacts to the nearby Great Basin National Park. The industrial aspect of the proposed facility will negatively deter from the park experience that all people expect for our National Parks.	The visual attractiveness of a wind farm is subjective. The impacts to visual resources visible from Wheeler Peak as well as the rest of spring valley are described in Section 4.8 of the Preliminary EA using official BLM methods and metrics.
10	17	VR	36	9	"Night Skies" are not addressed adequately. The park and surrounding valleys are some of the darkest in the nation. The public travels great distances to view these dark skies.	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
11	17	VR	60	6	We would like to point out that disturbance is calculated as a two-dimensional number. These towers are three-dimensional. The project area was moved south because of visual impacts to residents in Sacramento Pass. The BLM needs to calculate the vertical visual effects of flashing red lights at 450 ft above the ground. Has this been completed for the residents at Majors Junction or Osceola?	The viewshed delineation takes into account the height of the turbines including turbine blade rotations; not just the ground level location of proposed turbines.
3	21	VR	16	7	Large wind turbines are visually intrusive.	Comment noted.
12	21	VR	16	7	Spring Valley's land would eventually be scarred with abandoned wind turbines, as experienced in southern California.	A complete project restoration plan has been developed as shown in Appendix A. Further, the proponent will pay a bond to ensure that restoration can be completed.
1	22	VR	35	7	This, and solar, will litter the landscape of a pristine America if allowed to proceed. Look at Tehachapi, California, Texas, Idaho. I've seen those ugly monstrosities and they intrude on the beauty of the landscape.	Section 4.8 of the Preliminary EA provides an analysis of the impacts to Visual Resources from the proposed Spring Valley Wind Facility.
2	24	VR	16	9	Please not dramatic scenery and views of Wheeler Peak that will be destroyed by wind turbines, lights near dusk, etc.	Impacts to the landscape and night skies visible from Wheeler Peak are described in Sections 4.8.2, 4.8.2.3, 4.8.3, and 4.8.3.2 of the Preliminary EA. The visual simulation has been added to the EA to show the low visual contrast from Wheeler Peak.
52	26	VR	35	9	Wilderness Areas are found in the northern Snake Moriah and other areas - yet there is no analysis of the adverse visual or other effects on these areas from this facility. Many elements of the unique landscape are discussed throughout our comments, and are not adequately represented here.	Sections 3.8 and 4.8 of the Final EA have been revised to include descriptions of views from the Mount Moriah and High Schells Wilderness Areas, and the visual effects of the proposed Wind Energy Facility. Public Law 109-432 White Pine County Conservation and Recreation Act 2006, Section 325 Adjacent Management (b) states "Non-wilderness Activities-The fact that non-wilderness activities or uses can be seen or heard from areas within a wilderness designated under this subtitle shall not preclude the conduct of those activities or uses outside the boundary of the wilderness area."
53	26	VR	36	9	This section greatly underplays the national significance of the area, and the importance of the Dark Sky setting. Just how much lighting is there at the Cleve Creek campground? A couple camp fires in deer season? A Coleman lantern? This area is darker than the "typical rural sky", with only a few ranches. The EA claims the area "is assumed" to have a certain darkness character. Where are the quantitative studies over the course of the year?	In addition to Cleve Creek, Section 3.8.2 also refers to Bastian Creek Ranch, Majors Junction and the widely spaced residences simply as sources of artificial light. It goes on to describe Ely as the largest source of sky glow and the town of Baker. It concludes with the statement: "Because there are so few sources of light pollution, the night skies in the area of analysis and Great Basin National Park are some of the darkest skies in the continental United States." A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to better describe the existing conditions and to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
51	26	VR	60	6	The EA's KOP discussion provides little concrete info, and provides no basis for informed analysis. This is a unique well-watered undeveloped valley that provides a scenic backdrop for Great Basin National Park. In fact, potential expansion of the Park to include portions of the Valley would likely be killed by this SVW facility.	A description of the landscape character of the area is presented in Section 3.8.1 of the Preliminary EA, including views from within Great Basin Park on Wheeler Peak. The BLM is unaware of any potential expansion of Great Basin National Park.

Table H.4. Comment Response Table

Comment ID	Commenter ID	Comment Resource Category	Comment Resource Code	Comment Disposition	Comment	Comment Response
73	26	VR	60	6	BLM has failed to require Visual analysis that is commensurate with the unique, highly scenic world class scenic viewsheds. The Valley area contains critical backdrops to Great Basin National Park. It is likely to increase dust and light pollution in GBNP. The EA has only selected Wheeler Peak, and not other closer and scenic areas of the Park. BLM has also not examined this facility and its jarring and distracting visual impacts relative to many other important BLM and U.S. Forest Service land areas in the viewshed including Wilderness areas, important wild land use areas, the scenic ACEC, important cultural sites, etc.	As described in Section 3.8.1 of the Preliminary EA, the primary public views of the project area are from travel routes and not from static observation points. KOP 3 is also representative of views from the Bastian Creek Ranch. Wheeler Peak is included because of its location within the park and greater sensitivity to changes in the landscape. The project is not visible from residences at Sacramento Pass, Cleve Creek Campground, Majors Junction. Though there are many other view points that the SVWEF can be observed from, the five KOPs selected represent the major points that the casual observer would see the project. An assessment of the visibility of the project from the Mt. Moriah Wilderness and the Schell Creek Range has been added to Section 3.8.1.
74	26	VR	60	9	The Visual analysis fails to take into account the significance and vastness of the remote undisturbed area. It fails to fully consider the night time and night light effect, the effect of all the road scars and gashes, blowing dust from roads, "flicker effect", etc. All of this can also be distracting and dangerous to drivers. This is all greatly out of place on "the Loneliest Highway in America".	The landscape characteristics of Spring Valley are typical of the Great Basin and not considered unique. Although the area is largely undeveloped, it is not undisturbed, and visible modifications include U.S. 6/50, a power transmission corridor including several transmission lines, ranches, and historic mining activity. A description of the impacts to visual resources is presented in Section 4.8 of the Preliminary EA. All proposed turbines have appropriate setbacks and would not contribute to "flicker effect" to drivers or occupied structures in Spring Valley. In addition, a model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
75	26	VR	60	9	We are concerned that the very large turbines (400 ft.) to be used here are not accurately draw to scale in this analysis, and the cumulative effects of all the disturbance is not adequately examined. Smaller size turbines in areas of the Snake River Plain are visual intrusions over a distance of a dozen miles or more. The analysis in this EA is just not accurate - based on human observers in the real world. Plus what is the visibility from Sage Grouse leks, wintering areas, brood rearing areas, etc? This industrial development represents a gross ugly eyesore in an idyllic appearing desert valley right by Great Basin National Park. Ely BLM should consider alternatives to expand the ACEC and place much of the land of the valley in the most proactive VRM Category to protect recreation, tourism, wildlife, biodiversity and other important values of the public lands.	The Visual Resource Assessment referenced in Section 4.8.2.2 of the Preliminary EA provides accurate photographic simulations of the propose Wind Energy Facility from all of the Key Observation Points. These photo simulations have been added to Section 4.8.2.2 of the Final EA. Additionally, the impacts of the proposed facility on visual resources are described in Section 4.8.2.
10	27	VR	37	6	The BLM failed to use photomontages or simulations to provide realistic views of the proposed SVWEF and its likely visual impacts. These realistic views need to be illustrated in the EA, or potential EIS. Moreover, the visual impact analysis is suppose to illustrate "worst-case" conditions to the greatest extent possible. Excellent software is available for these relatively simplistic tasks and they provide the best possible visual impact assessments for wind projects like this. As is, the Draft EA and Figure 3.8-1 significantly downplay the actual visual impacts of the wind project's WTG and facilities.	Photographic visual simulations of the proposed Spring Valley Wind Facility are available in the Visual Resource Assessment as referenced in Section 4.8.2.2 of the Preliminary EA. A sample of these simulations have been directly incorporated into the Final EA.
13	27	VR	60	6	The Draft EA does little to describe the off-site visibility of the wind energy infrastructure. Impact descriptions are either vague, completely inappropriate, or insufficient for KOPs 1-4. The selection of KOPs on highways and their descriptions of impacts are inappropriate. Visual impacts are much greater if different non-roadway sites are selected for the visual impact analysis.	As described in Section 3.8.1 of the Preliminary EA, the primary public views of the project area are from travel routes and not from static observation points. KOP 3 is also representative of views from the Bastian Creek Ranch. Wheeler Peak is included because of its location within the park and greater sensitivity to changes in the landscape. The project is not visible from residences at Sacramento Pass, Cleve Creek Campground, Majors Junction. The five KOPs serve as representative viewpoints surrounding the project area.
12	27	VR	60	6	The 11-mile radius around the project area where visual resources and impacts were described in inadequate for the landscape context. Generally for wind energy projects, a 10-mile radius is the minimum from which impacts are described and detailed. However, given that the Basin and Range viewsheds are much greater than 11 miles, it stands to reason that a larger radius is more appropriate for the visual impact analysis.	The radius to describe visual impacts is not based on the size of the viewshed, but on the fact that visible contrasts are minimized with distance. Beyond 10 to 11 miles, visual contrasts are diminished. A larger radius would not result in different conclusions.
11	27	VR	60	6	The selection and description of Key Observation Points (KOPs) is flawed for several reasons. First of all, four of the five KOPs selected were located on roadways. KOPs normally focus on a variety of vantage points that are important areas of public use, beyond just roadways, such as recreation area, environmentally sensitive areas, trails and natural areas, historic sites or sites of cultural significance, and various other types of important scenic and cultural features. Second, while there is certainly merit to selecting KOPs that would be encountered by the greatest number of people, KOPs on roadways would be the obvious place in this landscape of the proposed project. Yet by selecting four out of five of the same type of KOPs, this Draft EA very specifically downgrades any potentially significant visual impacts on a variety of resources at a variety of sites around the project area. This calls into question the validity of the visual impact assessment and strongly indicates that potential adverse impacts to the human environment are likely to be significant.	As described in Section 3.8.1 of the Preliminary EA, the primary public views of the project area are from travel routes and not from static observation points. KOP 3 is also representative of views from the Bastian Creek Ranch. Wheeler Peak is included because of its location within the park and greater sensitivity to changes in the landscape. The project is not visible from residences at Sacramento Pass, Cleve Creek Campground, Majors Junction. Though there are many other view points that the SVWEF can be observed from, the five KOPs selected represent the major points that the casual observer would see the project. An assessment of the visibility of the project from the Mt. Moriah Wilderness and the Schell Creek Range has been added to Section 3.8.1.

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9	27	VR	60	9	Figure 3.8-1 provides a crude illustration of the visual impacts from the proposed project. Figures are suppose to be stand-alone items, but this figure and legend does not even provide simplistic definitions of the VRM Classes, greatly impeding an understanding of the graphic.	In addition to Figure 3.8-1, photographic visual simulations of the proposed Spring Valley Wind Facility are available in the Visual Resource Assessment as referenced in Section 4.8.2.2 of the Preliminary EA. These simulations have been directly incorporated into the Final EA.
16	28	VR	16	10	The SVW Project area is located within a Class III area for visual resource management as identified in the Ely RMP. The objective for management of Class III areas is to "partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominate natural features of the characteristic landscape." BLM Visual Resource Inventory Manual, H-8410-1, V.B.3. Contrast the objectives of Class III management with Class IV, which permits management activities to dominate the view and be the major focus of viewer attention. As SNWA explained in more detail in its comment letter on the December 2009 Draft EA, the SVW Project may not conform to the Ely RMP's Class III designation for the area.	The objective of Class III is to "partially retain the existing character of the landscape." Figure 3.8-1 shows a corridor of VRM Class IV objectives through the center of the project area. Section 3.8 of the Final EA has been revised to describe the transmission corridor through the center of the project area as Class IV - which allows for major modifications to occur. Additionally, because this is a landscape that has been modified by the presence of several large parallel transmission lines within that corridor, and a majority of views of the proposed facility would be against the backdrop of the valley floor, or surrounding mountain ranges, the conclusion that the proposed action is consistent with the objectives of VRM Class III has not changed. In addition, the project is also consistent with the Class IV objectives found through the center of the project area.
5	30	VR	16	6	The park's General Management Plan (GMP) and accompanying EIS addressed the lack of any valley bottom preservation standards by calling for interagency participation both early and upfront to allow the park the opportunity to review, comment and make recommendations concerning proposals that might affect the visual integrity of Spring Valley as well as shared Department of the Interior (DOI) natural resources. The Bureau of Land Management (BLM) was a cooperating agency for that GMP. A review of our administrative record fails to yield an initial scoping notice and our formal participation in this process began with the review of a preliminary EA.	This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008. Great Basin National Park was a cooperating agency on that Environmental Impact Statement. Additionally, representatives of Great Basin National Park were in attendance at a project stakeholder meeting facilitated by the BLM on Monday, October 20, 2008. As described in Section 7.3 of the Preliminary EA, that meeting provided the opportunity for stakeholders to get information, ask questions, and better understand the proposed project, what tasks had been completed, and what tasks remained.
6	30	VR	16	6	The valley is currently managed under a Visual Resource Management (VRM) Class III "to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basin elements found in the predominant natural features of the characteristic landscape." The park considers the existing primarily undisturbed or rural characteristics of the landscape to be of high value. While the VRM class might fit with the BLM's standards for management, the significant visual resource impacts affect all adjacent land management agencies whose needs should be disclosed, better understood and incorporated into any analysis.	This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008. Great Basin National Park was a cooperating agency on that Environmental Impact Statement. Section 4.8 of the Preliminary EA provides an analysis of the impacts to Visual Resources from the proposed Spring Valley Wind Facility including views from Wheeler Peak in the Great Basin National Park.
4	30	VR	35	6	Public Law 99-565 established Great Basin National Park (GRBA) for the purpose of preserving for the benefit and inspiration of the people a representative segment of the Great Basin of the Western United States possessing outstanding resources and significant geological and scenic values. The views of and across the Snake and Spring Valley basins are important to park values. The visual impairment of the Spring Valley basin as a result of pervasive industrial development could alter the basin scene that adds a critical dimension to GRBA. These views are important in fulfilling the park's purpose, as identified in our enabling legislation, to preserve and interpret a representative segment of the Great Basin physiographic region. The EA fails to disclose that the project has the potential to adversely impact park scenic values in terms of context, intensity, and duration.	Impacts to the landscape and night skies visible from Wheeler Peak are described in Sections 4.8.2, 4.8.2.3, 4.8.3, and 4.8.3.2 of the Preliminary EA.
8	30	VR	35	9	The park supports the Best Management Practice's adopted for the protection of night skies, including reducing the numbers of lights, shielding those that are used, and utilizing the minimum amount of FAA required lighting at the tops of turbines. The park requests that the latest technology to minimize light pollution be employed and the timing of the lights on the turbines not be synchronized to reduce the impact. Spring and Snake Valleys as well as GRBA, currently reside in one of the darkest night sky areas remaining in the country and night skies are a key park value. The document does not attempt to quantify the cumulative impacts to night skies from the additional industrialization of Spring Valley due to the SNWA groundwater development project as well as the Nextera and Hamlin Valley Wind project.	The Best Management Practices for protection of night skies would be included as part of the final selected alternative. The Cumulative Impacts analysis has been revised to better quantify the effects of reasonably foreseeable future actions on night skies in the area.

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7	30	VR	60	6	Page 113 of the EA states that "Impacts to visual resources associated with operation of a wind energy facility would result from the introduction of large WTGs into largely undeveloped and natural settings. Additionally, all aboveground structures associated with wind energy facilities (including fences around substations) would produce visual contrasts as a result of their typical physical characteristics (form, color, line, and texture) and reflective surfaces." Page 115 of the EA states that the "regular geometric forms and horizontal and vertical lines associated with the WTGs, substation, and access roads would result in a visual contrast with the irregular, organic forms, and colors of the existing landforms and vegetation." The very obvious addition of 75 turbines, 27 miles of new roads, and an electrical substation is not, to the park, a moderate level of change. This appears to be a significant contradiction of the VRM Class III that changes should repeat basic elements, not directly interfere with them. When the additional industrialization of Spring Valley from reasonably foreseeable projects (Southern Nevada Water Authority (SNWA) ground water development project, Nextera Wind Energy Development and the new Hamlin Valley proposed wind farm) are added, it appears that these actions would dominate the view and would	The objective of Class III is to "partially retain the existing character of the landscape." Figure 3.8-1 shows a corridor of VRM Class IV objectives through the center of the project area. Section 3.8 of the Final EA has been revised to describe the transmission corridor through the center of the project area as Class IV - which allows for major modifications to occur. Additionally, because this is a landscape that has been modified by the presence of several large parallel transmission lines within that corridor, and a majority of views of the proposed facility would be against the backdrop of the valley floor, or surrounding mountain ranges, the conclusion that the proposed action is consistent with the objectives of VRM Class III has not changed. In addition, the project is also consistent with the Class IV objectives found through the center of the project area.
11	31	VR	16	8	Class I objectives which "preserve the existing character of the landscape" and mandate that "change to the characteristic landscape should be very low and must not attract attention" and Class II objectives which "retain the existing character of the landscape" are far more appropriate classifications for an area this close to a national park that was established in part to preserve its "scenic values".	The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008. Great Basin National Park was a cooperating agency on that Environmental Impact Statement.
9	31	VR	16	8	We challenge the BLM's classification of the area as a VRM Class III area - an area representing "moderate value." It is the opinion of NPCA that decision-making regarding this project should be elevated to Class I/Class II using the BLM's classification system based on the close proximity of a national park and its aforementioned unique values.	The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008. Great Basin National Park was a cooperating agency on that Environmental Impact Statement.
4	31	VR	35	6	In essence, Spring Valley Wind proposes to erect a stark, harsh-looking industrial facility in a scenic and pristine valley, within alarmingly close proximity to one of America's national treasures - Great Basin National Park.	The visual attractiveness of a wind farm is subjective. The impacts to visual resources visible from Wheeler Peak as well as the rest of spring valley are described in Section 4.8 of the Preliminary EA using official BLM methods and metrics.
15	31	VR	35	6	Viewpoints from Wheeler Peak are additionally significant. Spectacular views from the peak were chronicled as early as 1869, recorded as conquests of an imposing western landmark, and noted for exceptional visibility. Today, hikers of Wheeler Peak typically begin their ascent from a trailhead near Wheeler Peak Campground and follow a groomed trail that rises 3,000 from the campground to the summit. From the summit, hikers experience sweeping vistas of the Great Basin. Depending on weather conditions, visibility can extend for more nearly 90 miles. Views from Wheeler Peak, including those to the basin floor and views to the West, help the park visitor better understand the physiographic characteristics of a unique hydrologic basin and preserve human history of the area.	Wheeler Peak is identified as a Key Observation Point in Section 4.8 of the Preliminary EA. Because of extensive views and panoramic landscape visible from Wheeler Peak, the proposed Spring Valley Wind Facility is not expected to have an effect on park visitors' understanding of the physiographic characteristics of the area.
21	31	VR	35	6	The mission of Great Basin National Park, through the park's enabling legislation, establishes scenic significance and the National Park Service Organic Act requires that scenic resources be protected into perpetually - the assessment does not appropriately consider the mandate of the National Park Service, the value of scenic resources nor does it adequately evaluate impacts to them.	Because the NPS does not have authority over lands outside the park boundary, it is our understanding that the mission of the park to protect scenic resources in perpetuity is limited to those lands within the park boundary. The Preliminary EA does include a Key Observation Point from Wheeler Peak within the park to disclose impacts to the views from within the park.
7	31	VR	35	6	With visibility both during the day and night a major point of attraction for the park's nearly 70,000 visitors, the prospect of the construction and ongoing maintenance of a major wind power generation station in full view of park visitors must be questioned.	Section 4.8 of the Preliminary EA provides an analysis of the impacts to Visual Resources from the proposed Spring Valley Wind Facility including views from Wheeler Peak in the Great Basin National Park.
22	31	VR	35	8	BLM's Class III raking of visual resources within the area is not compatible with the scenic significance of the national park.	The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III/IV through the BLM RMP/ROD in 2008 in which the park was a cooperating agency.
5	31	VR	35	8	Spring Valley Wind attempts to locate a massive facility within view and close proximity of Great Basin based on the park's remoteness from urban areas but remoteness should not be a consideration that supports locating a WGF. Instead, Great Basin's remoteness should be a reason to not site an industrial complex in the area. Increasingly, with urban sprawl and the frenzied pace of contemporary life, remote areas become increasingly important. Visitors to Great Basin attest to the "get-away" attributes of the park.	The proposed location for the Spring Valley Wind Energy Facility is not based on the remoteness of the area, but on the existing wind resource (which is identified in the BLM Ely RMP), and the existing access to power transmission.
2	31	VR	35	9	The proposed project is located on approach to the national park and within view from several vantage points inside the national park, particularly from Wheeler Peak, Nevada's second highest mountain peak.	Wheeler Peak along with vantage points along Hwy 6/50 are identified as a Key Observation Point in Section 4.8 of the Preliminary EA. A simulation from Wheeler Peak has been added to the EA.
3	31	VR	36	6	Notably, the proposed location for the WGF is in an area identified with unusually dark skies, among the best in the lower 48 states in the continental United States.	A description of the impacts to night skies is included in Sections 4.8.1.2, 4.8.2.3, and 4.8.4.2 of the Preliminary EA.
26	31	VR	36	9	While the preliminary EA recognized the importance of rare and uncommon dark skies, a faulty numeric scale of a Class 3 ranking was assumed by amateur astronomers which diminishes the importance of this resource.	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to better describe the existing conditions and to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."

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19	31	VR	36	9	Night sky viewing is fast becoming a reason travelers visit Great Basin National Park. Park interpretive programs on night sky viewing have become increasingly popular. In 2009, Great Basin convened 15 astronomers with 22 telescopic instruments and attracted more than 350 participants to a one-night stargazing event. In August 2010, the park hosted a three-day astronomy festival which attracted more than two dozen astronomers who set up more than 40 telescopes for the viewing public.	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
27	31	VR	36	9	Potential resource impacts from night lighting did not go far enough in protecting the area from sky glow.	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA. "Because of the small amount of artificial lighting being introduced at the wind facility, sky glow resulting from the Proposed Action would not result in a change to the Bortle Dark-Sky rating of Class 3."
18	31	VR	36	9	In 2004 and 2005, the Night Sky Team recognized Great Basin as one of the darkest places in the country. The significance of preserving this "last chance" resource is relevant to the fact that two-thirds of Americans cannot see the Milky Way from their backyards and nearly all Americans live in places with measurable light pollution.	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA.
17	31	VR	36	9	NPCA notes that the Preliminary EA mentions that area's dark skies and applauds this addition in the evaluation of the Spring Valley Wind Project. We also applaud acknowledgement of National Park Service mandates to protect "natural lights capes" including dark night skies "unperturbed by artificial lights".	A model of the effects of the proposed Wind Energy Facility has been completed by Dark Sky Partners to confirm the conclusions described in Section 4.8.2.3 of the Preliminary EA.
16	31	VR	60	6	NPCA notes the Visual Contrast Rating Worksheet from Wheeler Parks identifies excavation for the turbines and facility foundation, vegetation removal, and turbines painted flat matte gray as visual impacts from Wheeler Peak. The KOP and other BLM analysis on potential adverse viewshed impacts related to the proposal does not appear to take into account the significance of preserving "scenic views" as mandated by the national park's statute. NPCA further notes that the project has not adequately addressed how these visual considerations might be mitigated.	The BLM is not mandated to preserve "scenic views." However, BLM manual 8400 Visual Resource Management .06 (A) states "The Bureau has the basic stewardship responsibility to identify and protect visual values on public lands." Project-specific mitigations have been identified in Section 6.4 of the Preliminary EA: "Following construction activities, as described in the Restoration and Weed Management Plan...use soil and rock stain on restored areas to reduce the visible color contrast between bare soil and vegetation."
25	31	VR	60	6	Mitigation efforts regarding the views from Wheeler Peak were not outlined.	The BLM is not mandated to preserve "scenic views." However, BLM manual 8400 Visual Resource Management .06 (A) states "The Bureau has the basic stewardship responsibility to identify and protect visual values on public lands." Project-specific mitigations have been identified in Section 6.4 of the EA: "Following construction activities, as described in the Restoration and Weed Management Plan...use soil and rock stain on restored areas to reduce the visible color contrast between bare soil and vegetation."
8	31	VR	60	6	In April 2008, the Bureau of Land Management's Ely District Office recognized during a pre-project meeting the visual resources related to the Spring Valley Wind proposal as one of several "issues of concern." NPCA applauds the BLM's insistence that a Visual Resource Inventory (VRI) be conducted regarding this project but also notes that, despite comments in January, the VRI study prepared by SWCA Environmental Consultants has not been re-examined or updated from September 2009.	The BLM conducts inventories and makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III/IV through the BLM RMP/ROD in 2008. The Visual Resource Assessment is an evaluation of the impacts to visual resources and the consistency with Visual Resource Management Class. The Visual Resource Assessment reflects the proposed action as described in the Preliminary EA and no changes were determined necessary.
23	31	VR	60	6	Only one location from within the park was evaluated, with no consideration for other viewpoints within the park or from travel routes approaching the park.	The Wheeler Peak KOP is representative of views from within the park. Additionally, the views of people traveling to the Park are captured by the KOPs along U.S. Route 6/50.
13	31	VR	60	6	Furthermore, per the Springs Valley Wind Visual Resource Assessment, only one single ranking was completed from a vantage point within the park, Wheel Peak. This location was evaluated from a position representing "the views of people looking directly at the project area from the summit." NPCA believes that there are other overlooking vantage points within the park, as well as travel points approaching the park, that require assessment by the BLM, which is currently lacking in the VRA.	The Wheeler Peak KOP is representative of views from within the park. Additionally, the views of people traveling to the Park are captured by the KOPs along U.S. Route 6/50. Though there are many other view points that the SVWEF can be observed from, the KOPs selected represent the major points that the casual observer would see the project.
14	31	VR	60	6	NPCA also questions the critical viewpoint analysis (KOP) from Wheeler Peak. While the Visual Resource Assessment acknowledges that Spring Valley Wind turbines would be visible from Wheeler Peak, 11 miles away, this analysis attempts to subjectively discount the wind generating facility's impact on the landscape by postulating that park visitors are uninterested in views of the basin floor or views to the west, where the project would be located. (See Page 13. "Additionally, the valley floor is not the dominate view. Views to the south, east and north of the rugged Snake Range are more scenic to visitors at the summit.")	Section 4.8.2.2 of the Preliminary EA states "The scenic panoramic views of the surrounding rugged mountain ranges would dominate the view of visitors at the summit." This conclusion has not changed.
24	31	VR	60	7	Evaluation of a viewpoint from Wheeler Peak did not address the sweeping vistas from the peak and, in fact, arbitrarily and subjectively attempted to diminish this perspective.	The BLM does not try to diminish the view from Wheeler Peak. Section 3.8.1 of the Preliminary EA states : "This KOP represents the views of visitors to the park, primarily those visitors climbing Wheeler Peak. The viewshed of GBNP is a vast area of largely undeveloped lands, almost 200,000 square miles of the Great Basin. Lands surrounding the GBNP are valleys and mountain ranges, including the Mount Moriah Wilderness to the north and the High Schells Wilderness to the west. The rugged horizon lines of those surrounding mountain ranges extend for miles to the north and south. The expansive valley floors are covered in tan, green, and gray grass and shrub lands, interspersed with darker green juniper trees. They are also crisscrossed with lighter toned dirt and paved roads and transmission lines. Visitors to the summit have clear panoramic views of the entire area."

Table H.4. Comment Response Table

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10	31	VR	60	8	BLM's inventory process of identifying the visual resources of an area and assigning them inventory classes (as outlined in BLM Handbook H-8410-1, Visual Resource Inventory), requires that the BLM evaluate potential surface-disturbing activities and assign appropriate management objectives. In reviewing the Spring Valley Wind Visual Resource Assessment document, it must be noted that "national park" was mentioned only twice in the document and only addressed as a locator of Wheeler Peak, on of five sites that were evaluated as KOPs or "critical viewpoints".	The BLM conducts inventories and makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III/IV through the BLM RMP/ROD in 2008. The Visual Resource Assessment is an evaluation of the impacts to visual resources and the consistency with Visual Resource Management Class. Great Basin National Park is discussed in detail throughout the EA in sections such as visual, noise, and land use; including a visual simulation from Wheeler Peak as a representative view from one of the few readily accessible locations in the Park that has a direct view of the project area.
12	31	VR	60	8	The Environmental Assessment's Class III classification of the Spring Valley Wind project could potentially lead to the development of a project that is not consistent with the park's mandate to preserve its "scenic values". Because Class I/Class II objectives were not established in the document, it can be assumed that the Visual Resource Assessment is incomplete and flawed.	The VRM Class was not assigned as part of this project or the Visual Resource Assessment. The BLM makes Visual Resource Management Class designations through the land use planning process. This area of Spring Valley was designated as VRM Class III through the BLM RMP/ROD in 2008.
4	34	VR	16	6	Visual impacts made the wind energy should be considered, especially when the Indian tribes come in to the area to hunt and gather plants or hold ceremonies.	The impacts to visual resources are described in Sections 4.8.2, 4.8.3, and 4.8.4 of the Preliminary EA.
9	14	WR	17	6	The EA states that up to 30.7 acre feet of water would be used in total for the entire project. Because the basin in question is over-appropriated for water use, we would like to see a final EIS break down the water use in a table. The water use should be broken down into categories of dust control, long term maintenance, concrete mixing and personal use of construction workers. The EA fails on all accounts to adequately describe what is proposed.	Section 2.1.1.2.12 of the Preliminary EA provides the requested breakdown in the text: "In normal conditions, a total of about 20,000 gallons of water per turbine would be needed for batching concrete; however, Pattern Energy may need to increase the moisture content by as much as 10%. Based on the maximum of 75 turbines, a total of 1,650,000 gallons of water would be needed for turbines. Of the remaining 8,350,000 gallons, 60%--70% would be used for dust suppression, and the balance (~5,280 gallons a week) would be necessary for potable uses throughout both the construction period and during operations."
3	26	WR	53	6	Turbines will be placed in soils that are very likely to be subject to subsidence. This raises serious unanswered questions about the stability of turbines. Plus excavation for turbines, hydrological disruption from the 28 miles of roads and other construction activity is likely to alter underground features and potentially ground water.	As stated in Section 2.1.1.2.1 of the Preliminary EA: "Prior to construction, additional geotechnical investigations would be completed at each turbine location, and throughout the project area as needed, to identify any site specific construction issues and prepare final foundation design and necessary BMPs." These final foundation designs would account for differential settlement of the soils.
4	26	WR	56	6	Irrigation in the valley is already leading to aquifer declines. There is no analysis provided for the current rate of decline, subsidence, or other instability or uncertainty related to water. As aquifers decline, their ability to support stabilizing native vegetation on the soil surface is also reduced. In greed for water, SNWA has even revealed there are foreseeable plans to purposefully kill vegetation in the valley areas so that the plants are not transpiring water. Plus in the context of the insect food critical for native bats, as water resources decline so too may essential insect prey of rare bats - inflicting even more stress on the rare and declining bat populations.	The greatest amount of water use associated with the proposed Spring Valley Wind Facility would be through a temporary lease with existing water rights holder, would occur during the construction phase, and would total 0.44% of the total annual groundwater discharge in Spring Valley. There would be no long-term change to groundwater resources in Spring Valley from the proposed action or alternative action.
8	26	WR	56	7	Plus, it is highly foreseeable that as part of the foreseeable wind developments that ground water may be withdrawn not only for ground water mining for the Southern Nevada Water Authority, but also for water storage devices for the days when wind may not be sufficient to produce power. We understand there is at least one of these wind hydro lift projects proposed for the Ely area. Where is that? How foreseeable are such projects here? What will be the cumulative effects, along with the SNWA aquifer de-watering, on the underground aquifer? And how will subsidence and sinking affect the long-term stability of any turbines put in place here?	The proposed Spring Valley Wind Facility does not include a "hydro lift" component and there are not any current applications for that type of project in Spring Valley. Additionally, as stated in Section 2.1.1.2.1 of the Preliminary EA: "Prior to construction, additional geotechnical investigations would be completed at each turbine location, and throughout the project area as needed, to identify any site specific construction issues and prepare final foundation design and necessary BMPs."
8	27	WR	53	9	The Draft EA states that changes to surface water quality would result from increased erosion associated with ground-disturbing activities, increased traffic from construction activities, and operation of heavy machinery. These changes in water quality will adversely affect areas of cultural and spiritual significance of water resources to our people, it must be stated in the EA that those water quality changes will adversely impact the integrity of the multitude of sites, including Swamp Cedars, that are both eligible under NRHP and important for the CTGR and other tribes.	Sections 4.6 and 4.7 of the Final EA have been revised to include more detailed information specific to the project location and the site-specific consultation, studies, and inventories completed regarding cultural resources and Native American religious concerns.
19	28	WR	17	9	Table 5.0-1, Draft EA at 135, identifies SNWA's water rights in Spring Valley. This discussion should be updated pertinent to June 17, 2010 Nevada Supreme Court opinion. SNWA holds groundwater applications for 91,224 any in Spring Valley. SNWA also holds existing surface and groundwater agricultural rights in Spring Valley. The entirety of SNWA's GWD Project is also not represented. Only the Spring Valley Lateral pipeline is described; other components of the GWD Project within Spring Valley and future groundwater production facilities are not described and quantified.	Table 5.0-1 and the information presented in the cumulative impacts analysis has been revised to reflect the GWD project in Spring Valley and the most current information.

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dispositionid	dispositiondescription
6	AA (Already Addressed)
7	NS (non substantive)
8	OOS (out of scope)
9	S-C (change in FEIS required)
10	S-NC (no change required)