

HIDDEN HILLS TRANSMISSION PROJECT

ENVIRONMENTAL IMPACT STATEMENT

SCOPING REPORT

Prepared for

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ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
BSE	Bright Source Energy Inc.
CFR	Code of Federal Regulations
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act
GHG	greenhouse gas
HHSEGS	Hidden Hills Solar Electric Generating Station
kV	kilovolt
MW	megawatts
NEPA	National Environmental Policy Act
ROW	right-of-way
SF6	sulfur hexafluoride
VEA	Valley Electric Association



1.0 INTRODUCTION

1.1 Background

The Bureau of Land Management (BLM) is preparing an environmental impact statement (EIS) to analyze the impact of the proposed Hidden Hills Transmission Project. The applicant, Valley Electric Association (VEA), has requested a new right-of-way (ROW) authorization from the BLM for the construction, operation, maintenance, and termination of transmission infrastructure improvements in Pahrump and Sandy valleys to Jean, Nevada, terminating at Eldorado Substation near McCullough Pass.

On October 11, 2011, the BLM published a Notice of Intent to prepare an EIS on the proposed transmission project in the *Federal Register* (Appendix A). The EIS is being prepared to analyze and disclose to the public the environmental, social, and economic impacts of the proposed transmission project. The EIS will be prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended; Council on Environmental Quality regulations implementing NEPA; Federal Land Policy and Management Act (FLPMA) of 1976; and other associated laws and regulations. In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the Proposed Action. The EIS will analyze at least three alternatives, the Proposed Action in VEA's ROW application, the No-Action Alternative, where the BLM would not approve the ROW as requested, and other alternatives to the Proposed Action, as appropriate. The BLM is the lead agency preparing the EIS, in cooperation with other federal, state, local, and tribal governments and government agencies.

1.2 Purpose

The BLM's purposes in considering the Hidden Hills Transmission Project are as follows:

- To meet public needs for use authorizations, such as ROWs, permits, leases, and easements, while avoiding or minimizing adverse impacts to other resource values and locating the uses in conformance with land use plans. The FLPMA provides the BLM with the authority to grant ROWs on public land. Additionally, the Energy Policy Act of 2005 and the President's energy policy recognize and encourage use of public land for energy-related facilities. Title 43 Code of Federal Regulations (CFR) Part 2801.9 requires a BLM ROW grant for use of public lands for "systems or facilities over, under, on, or through public lands," including transmission lines. The BLM has received a ROW application from VEA and must decide whether to allow the use of BLM-managed public lands for the construction, operation, maintenance, and termination of VEA's proposed 500-kV transmission line, natural gas pipeline, and other ancillary facilities.
- To process ROW application NVN-089969, submitted by VEA, in an expeditious manner consistent with both Executive Order 13212 (Actions to Expedite Energy-Related Projects) and mandates of the Energy Policy Act of 2005 and the American Recovery and Reinvestment Act of 2009.

1.3 Location

The proposed Hidden Hills Transmission Project is located in both Nye and Clark counties in southern Nevada (Figure 1). The project crosses Pahrump and Sandy valleys, crosses over to Jean, Nevada, and would terminate at the Eldorado Substation in Eldorado Valley south of Boulder City, Nevada.



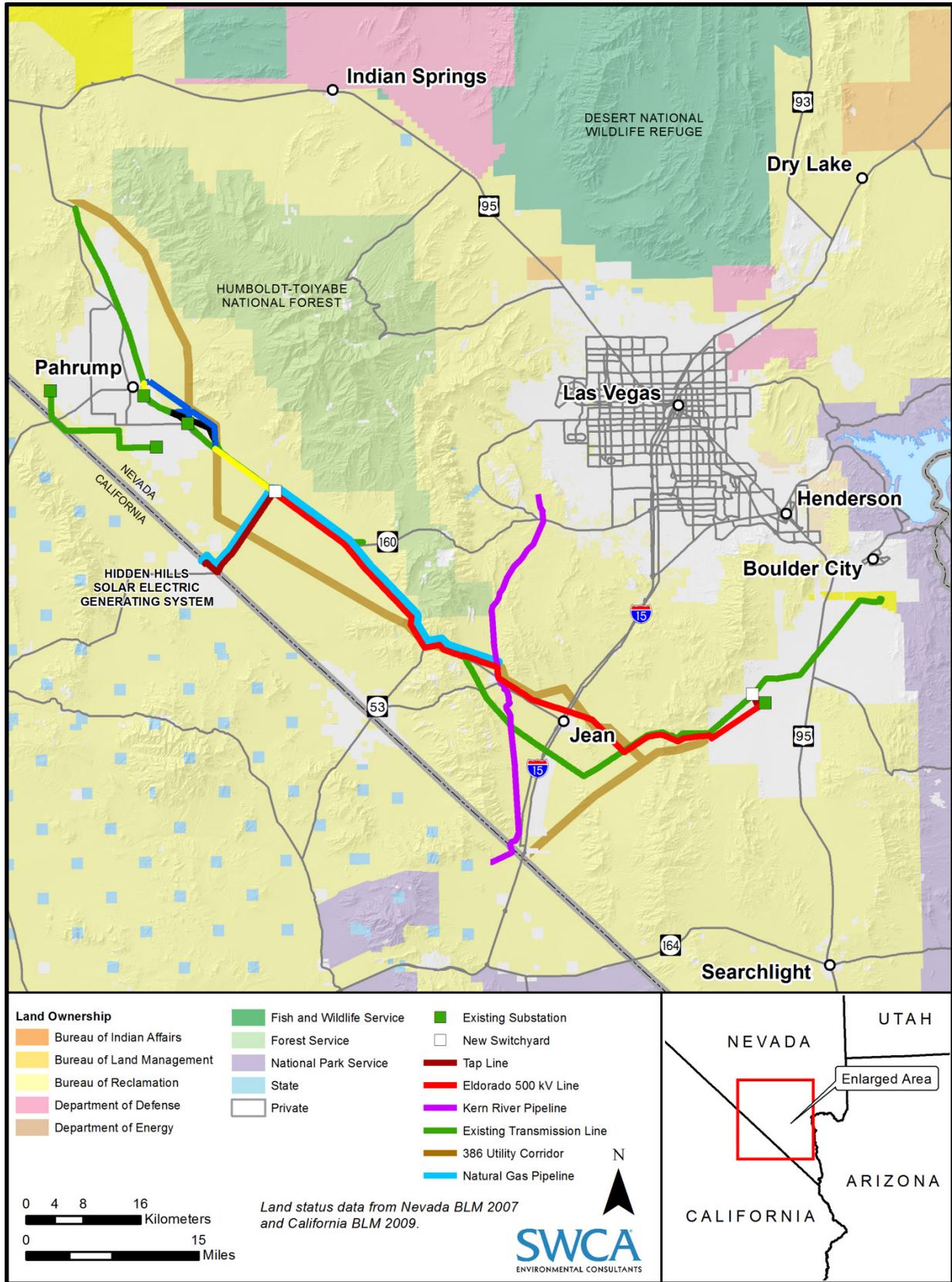


Figure 1. Project location map.



1.4 Description

The proposed Hidden Hills Transmission Project would support the delivery of 500 megawatts (MW) into the VEA transmission system for the development of the Hidden Hills Solar Electric Generating Station (HHSEGS), a solar electric generating facility to be developed by Bright Source Energy Inc. (BSE). The HHSEGS will be considered in the EIS as a connected action to the proposed Hidden Hills Transmission Project. If the VEA ROW is approved, the connected HHSEGS solar project would be constructed in approximately 24 months, with a target completion by Fourth Quarter 2014 or First Quarter 2015. The commercial on-line date is set for the First or Second Quarter 2015. The HHSEGS would consist of two 250-MW solar thermal electric generating plants, with shared common facilities, and would be located on 3,275 acres of privately owned lands in Inyo County, California, approximately 18 miles south of Pahrump, Nevada. Pahrump is located about 40 to 45 miles west of Las Vegas, Nevada. Although the HHSEGS project would be located on privately owned land in California, the transmission and natural gas lines, once they leave the HHSEGS site, would be located on public land managed by the BLM Southern Nevada District Office. In addition to the support of the HHSEGS, the construction of the VEA proposed project will support the development of additional renewable resource generation facilities within the State of Nevada.

The proposed VEA transmission improvements would consist of the following new or expanded facilities on BLM land:

- A new 10-acre BSE Tap 230-/500-kilovolt (kV) Substation (Tap Substation) located immediately northeast of the existing VEA 138- and 230-kV transmission line alignments adjacent to State Route 160.
- Approximately 9.7 miles of new 230-kV single circuit transmission line from the HHSEGS project site to the new BSE Tap Substation.
- Ancillary facilities required as a result of the BSE 230-kV Tap Line include a 2-acre Switch northwest of Eldorado Substation, and approximately 1 mile of 230-kV transmission line would be constructed from the new 230-kV Tap Switch to the Eldorado Substation.
- Approximately 53.7 miles of new 500-kV single-circuit transmission line from the BSE Tap Substation to the existing Eldorado Substation.
- A 230-kV transmission line from the 10-acre BSE Tap 230-/500-kV Substation to Pahrump to provide the necessary backfeed into the Pahrump Community for system integrity.
- Improvement of existing VEA facilities to accommodate the necessary interconnections at Pahrump Substation, Vista Substation, Gamebird Substation, Charleston Substation, and Eldorado Substation.
- Installation of a buried 9.3-mile-long 12-inch-diameter natural gas pipeline, which would extend from the HHSEGS site until it intersects the existing VEA 230-kV transmission line. From this location, a 36-inch-diameter line would turn southeast and continue for 26 miles, at which point it would connect with the existing Kern River Gas Transmission pipeline.
- Construction and operation of new and improved existing access roads along each of the proposed transmission alignments.
- Temporary work areas associated with construction activities, materials storage, and staging.

1.5 Document Organization

This document contains summary descriptions of the following:



- scoping meetings, including public notices and advertising for the meetings;
- opportunities for public comment during the scoping period;
- the scoping content analysis process, including how individual letters and comments were coded and recorded; and
- comments received during the scoping period (October 11, 2011 – December 12, 2011), organized by resource.

2.0 SCOPING PROCESS

The purpose of scoping is to provide an opportunity for members of the public to learn about the Proposed Action and to share any concerns or comments they may have. Input from the public scoping process is used to help the BLM identify issues and concerns to be considered in the EIS, as well as to identify potential alternatives. In addition, the scoping process helps identify any issues that are not considered relevant and can therefore be eliminated from detailed analysis in the EIS. The list of stakeholders and other interested parties is also updated and generally expanded during the scoping process.

The scoping process used for this EIS was initiated by publication of a Notice of Intent in the *Federal Register* on October 11, 2011. The 60-day period for submitting scoping comments was from October 11, 2011, through December 12, 2011. Although the official scoping period ended on December 12, 2011, the BLM will continue to accept comments throughout the EIS process.

2.1 Objectives

Scoping is the first step and an integral part of the EIS process. It is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the Proposed Action (40 CFR 1501.7). The objectives of the scoping process are to:

- increase public awareness and understanding of public lands stewardship through meaningful and productive constituent and local stakeholder involvement in the development of the EIS;
- engage federal, state, local, and tribal governments and the public in the early identification of concerns, potential impacts, and possible alternative actions;
- determine the scope and the significant issues to be analyzed in depth in the EIS;
- identify potentially significant issues related to the Proposed Action;
- identify and eliminate issues that are not significant or that have been covered by prior environmental review;
- identify the scope of issues to be addressed and integrate analyses required by other environmental laws (e.g., Endangered Species Act, National Historic Preservation Act); and
- identify technical studies needed to adequately address the potential impacts of the proposed project.

2.2 Advertising of Public Meetings

Pursuant to NEPA requirements, the scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates (Table 1). In each format, the advertisements provided logistics, explained the purpose of the public meetings, gave the schedule for the public comment



(scoping) period, outlined additional ways to comment, and provided methods for obtaining additional information (Appendix B).

Table 1. Meeting Notification Methods and Dates

Publicity Item	Venue and Date
Notice of Intent (see Appendix A)	<i>Federal Register</i> —October 11, 2011
Legal advertisement (see Appendix B)	<i>Las Vegas Review Journal</i> —October 21, 2011 <i>Pahrump Valley Times</i> —October 21, 2011 <i>Boulder City Review</i> —October 20, 2011
Postcard mailing (see Appendix B)	BLM stakeholder list—October 24, 2011
News release (see Appendix B)	<i>BLM Southern Nevada District Office</i> —October 11, 2011
BLM website (see Appendix B)	< http://www.blm.gov/nv/st/en/fo/lvfo/blm_information/newsroom/2011/october/blm_to_hold_public.html >—October 27, 2011

2.3 Public Scoping Meetings

The BLM hosted three public meetings in November 2011, as shown in Table 2. At the meetings, the project leaders provided brief summaries about the NEPA process and the proposed project and took verbal comments and questions from meeting attendees. The open house format was designed to allow attendees to view informational displays, ask specialists about the proposed Hidden Hills Transmission Project and the EIS process, and submit written or verbal comments on-site. Members of the public were provided with comment forms, fact sheets, and visual displays to learn about the proposed project details. Participants were also encouraged to join the mailing list. Copies of the meeting posters are provided in Appendix C. The visual displays provided information about the following:

- NEPA process,
- General project location,
- Project site details, and
- VEA profile information.

Table 2. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Location in Nevada	Meeting Date in 2011	Time of Meeting	Number of People Who Signed In
Pahrump	November 8	6:00 p.m. – 8:00 p.m.	35
Jean	November 9	6:00 p.m. – 8:00 p.m.	14
Boulder City	November 10	6:00 p.m. – 8:00 p.m.	10

2.4 Opportunities for Public Comment

Members of the public were afforded several methods for providing comments during the scoping period:

- Comments could be recorded on comment forms at the scoping meetings. Comment forms (see Appendix C) were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Comments could be submitted verbally and recorded by a court reporter at the scoping meetings. Comments that occurred during the meeting question and answer period were also recorded in transcript.



- Emailed comments could be sent to a dedicated email address: ValleyElec_HiddenHillsEIS@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to Bureau of Land Management, Las Vegas Field Office, 4701 N. Torrey Pines Drive, Las Vegas, NV 89130.

All comments were given equal consideration, regardless of method of transmittal.

2.5 Collaborative Planning

The term ‘collaboration’ may be used to describe a wide range of external and internal working relationships. The collaborative process essentially allows the community to communicate to the BLM how public lands should be managed from the public’s perspective. The final goal of the process should be that communities and agencies work together toward a common understanding on the future management of the public lands.

Agency coordination is an important step in a successful collaborative process for several reasons. First, early involvement with other federal, tribal, state, and local governments establishes a solid working relationship with each agency. Next, it also builds trust and credibility among agencies that can then be transferred to the public. Finally, it helps to ensure that the BLM develops land use decisions that are supported by other interested agencies.

Active involvement by the public early in the process helps to ensure consideration of alternatives that address the diversity of public interests, build trust between the BLM and the public, and create public understanding and acceptance of the eventual decision.

Agency Coordination

Early and frequent coordination with affected agencies is emphasized in the Council on Environmental Quality regulations. The BLM is also required by law and regulation to consult with specific agencies and entities because of jurisdictional responsibilities.

Although no specific agency scoping meetings have been held, the BLM has contacted key federal, state, county, and local agencies, as well as American Indian tribes, to initiate coordination throughout the EIS process. Table 3 lists the agencies that BLM has contacted as of the date of this report.

Table 3. Agencies Contacted to Initiate Coordination

Federal	Federal Aviation Administration, San Francisco Airport District Office
	Federal Aviation Administration, Western Pacific Airport Division
	National Park Service (NPS), Death Valley National Park
	NPS, Lake Mead National Recreation Area
	NPS, Mojave National Preserve
	U.S. Army Corps of Engineers
	U.S. Bureau of Reclamation, Lower Colorado Regional Office
	U.S. Department of Defense (Nellis Air Force Base)
	U.S. Department of Defense, Regional Environmental Coordination Office



Table 3. Agencies Contacted to Initiate Coordination (Continued)

	U.S. Department of Energy, Loan Guarantee Program
	U.S. Department of Energy, National Nuclear Security Administration
	U.S. Department of Transportation
	U.S. Environmental Protection Agency – Region 9
	U.S. Fish and Wildlife Service
	U.S. Geological Survey
State	Nevada Department of Minerals
	Nevada Department of Transportation
	Nevada Department of Wildlife
Local	City of Boulder City
	City of Henderson
	City of Las Vegas
	City of North Las Vegas
	City of Mesquite
	Clark County
	Clark County Department of Aviation
	Clark County Regional Flood Control District
	Nye County
	Nye County Commissioners
	Nye County Nuclear Waste Repository
	Southern Nevada Water Authority

Tribal Consultation

The BLM is currently consulting with Tribes on a government-to-government level. This consultation will be formally initiated via letters in January 2012 and will be ongoing throughout the development of the EIS. The BLM is consulting with the following eleven Tribes on a regular basis for this project and is including updated information on this EIS in ongoing consultation meetings. The Tribes consulted on this EIS include the Las Vegas Paiute, Moapa Band of Paiutes, Pahrump Paiute, Colorado River Indian Tribe, Chemehuevi, Timbisha Shoshone, Fort Mojave Indian Tribe, Fort Independence Band of Paiute, Bishop Paiute, Big Pine Band of Owens Valley, and Lone Pine Paiute-Shoshone Reservation. A summary of this tribal consultation process will be included in the NEPA documentation.

3.0 SCOPING CONTENT ANALYSIS

There are four phases to the process used to analyze comments received during public scoping for the EIS: 1) developing an issue coding structure, 2) importing into and organizing all submittal content in a comment database, 3) carefully reading each submittal and assigning codes to relevant comments, and 4) preparing a narrative report of the results of the analysis. It is important to note that the comment

analysis process is not and should not be considered a vote. Every effort was made to qualify the intensity of the public's expressions, and all comments were treated evenly and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors. Emphasis was on the content of a comment, rather than on who wrote it or the number of submitters who agreed with it.

3.1 Development of the Coding Structure

Initially, a coding structure was developed to help sort comments into logical categories and subcategories by issue, specifically resources and planning processes applicable to the project area. The issue coding structure was derived from an analysis of the range of issues covered in similar relevant planning documents and evolved as submittals were read and relevant comments identified. The use of these codes allows for quick access to comments on specific topics. Table 4 shows the issue categories that were determined to be most inclusive of the substantive comments received during public scoping.

Table 4. Resource Issue Identification

Resource Issue	Resource Category
Air Quality	AIRQ
Biological Resources	BIOL
Cultural Resources	CULT
Hazardous Materials	HAZA
Lands	LAND
Miscellaneous	MISC
NEPA	NEPA
Reclamation	RECL
Recreation	RECR
Socioeconomics	SOCI
Soils and Geology	SOIL
Soundscape	SOUN
Transportation	TRAN
Visual Resources	VISU
Water Resources	WATE

3.2 Database Analysis

The second phase of the analysis process involved creating submittal records in a comments database for every submittal received. The commenter information and comment text were entered into the database manually. Each submittal was recorded in the database, where it was assigned a unique number and was then labeled with a commenter type code that indicated the entity from which it was received (i.e., 'I' for individual; 'G' for government agency; 'O' for organization; 'B' for business; or 'T' for tribe). Submittals that included only a person's name and any address information were coded as having been received from an individual. If an affiliation with a business, government (federal, state, or local), tribe, or organization was included in the commenter information of a submittal, the submittal record was assigned to the corresponding commenter type category. The submittal mode of delivery is also identified (e.g., public meeting comment form).

3.3 Identification and Coding of Comments

Once submittal records were coded for commenter and submittal types, each submittal was read carefully to identify preliminary issues that will be addressed during the preparation of the EIS. Each individual statement identified as a relevant comment was assigned a resource category (see Table 4). Each comment was then further described using a specific descriptive resource code (numeric), as illustrated in Table 5. Each submittal may include multiple coded comments. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general resource issue. It also allows for cross-referencing and comparison.

Table 5. Resource Code Identification

Resource Category	Resource Code	Description
AIRQ	01	General
	02	Dust
	03	Cumulative Impacts Analysis
	04	Greenhouse Gases / Climate Change
	05	Mitigation
BIOL	01	General
	02	Special Status Species
	03	Wildlife Habitat
	04	Avian Species
	05	Weeds / Invasive Species
	06	Cumulative Impacts Analysis
	07	Vegetation
	08	Mitigation
CULT	01	General
	02	Historic Trail
	03	Tribal Resources
	04	Cumulative Impacts Analysis
	05	Tribal Consultation
HAZA	01	Gas Pipeline
	02	General
	03	Mitigation
LAND	01	General
	02	Rights-of-Way
	03	Wildfire
MISC	01	General Support for Proposal
	02	General Non-support for Proposal
NEPA	01	General
	02	Connected Action
	03	Process
	04	Purpose and Need
	05	Alternative
	06	Proposed Action
	07	Proposed Action Funding
	08	Cumulative Impacts Analysis

Table 5. Resource Code Identification (Continued)

Resource Category	Resource Code	Description
RECL	01	General
RECR	01	General
	02	Off-Highway Vehicle Use
	03	Trails
SOCI	01	General
	02	Employment
	03	Economic Growth
	04	Power Rates
	05	Environmental Justice
SOIL	01	Soil Erosion
SOUN	01	General
TRAN	01	General
VISU	01	General
	02	Cumulative Impacts Analysis
	04	Visual Simulations
WATE	01	General
	02	Groundwater
	03	Water Use / Quantity
	04	Cumulative Impacts Analysis
	05	Water Rights
	06	Water Quality
	07	Regulatory Framework
	08	Mitigation

3.4 Preparation of Scoping Report

The final phase included identifying statements of public concern and preparing this narrative report. The statements of concern are a compilation of comments received from the public and various agencies during public scoping. The intent of this compilation is to provide representative statements that capture, with minimal repetition, all major concerns expressed during the public comment period. The statements are not necessarily verbatim iterations of comments received but in many cases include similar or exact phrasing.

4.0 SUMMARY OF PUBLIC SCOPING COMMENTS

4.1 Submittals Received

In total, 19 submittals were collected during public scoping, none of which were identified as duplicate submittals. Table 6 illustrates the types of submittals received and their corresponding comment totals and percentages.



Table 6. Distribution of Comments by Submittal Type

Submittal Type	Submittal Total	Comment Total	Percent of Total (Comments)
Email	8	133	62%
Comment Form	4	13	6%
Verbal Comment Transcripts	3	37	18%
<i>Pahrump Scoping Meeting</i>		11	
<i>Jean Scoping Meeting</i>		22	
<i>Boulder City Scoping Meeting</i>		4	
Letter	4	30	14%
Total	19	213	100%

Table 7 lists the number of submittals and comments by submitter type (individual, government, organization, tribal). It also lists the agencies, organizations, and tribes that submitted comments. Submittals were received from three states, including Nevada, California, and Utah. These included submittals from Clark and Nye counties in Nevada; Inyo County, California; and Salt Lake County, Utah.

Table 7. Agencies and Organizations that Submitted Scoping Comments

Submitter Type	Name	Submittal Count	Comment Count
Individual	See Appendix D (includes 3 scoping meeting transcripts)	8	58
Government	National Park Service U.S. Environmental Protection Agency State of Nevada, Department of Wildlife Clark County, Nevada County of Inyo, California	5	76
Organization	Amargosa Conservancy Basin and Range Watch Center for Biological Diversity HawkWatch International Goodsprings Historical Society	5	72
Tribal	Pahrump Paiute Tribe	1	7
Total		19	213

4.3 Comments Identified

In total, 213 comments were identified in the submittals received during public scoping (see Appendix D). Table 8 shows the distribution of individual comments received by resource category and resource code.



Table 8. Distribution of Public Scoping Comments by Resource Category

Code	Description	Comments
AIRQ Air Quality		
01	General	3
02	Dust	2
03	Cumulative Impacts Analysis	1
04	Greenhouse Gases / Climate Change	7
05	Mitigation	5
<i>Subtotal</i>		<i>18</i>
BIOL Biological Resources		
01	General	1
02	Special Status Species	20
03	Wildlife Habitat	10
04	Avian Species	2
05	Weeds / Invasive Species	4
06	Cumulative Impacts Analysis	6
07	Vegetation	3
08	Mitigation	11
<i>Subtotal</i>		<i>57</i>
CULT Cultural Resources		
01	General	5
02	Historic Trail	6
03	Tribal Resources	2
04	Cumulative Impacts Analysis	1
05	Tribal Consultation	1
<i>Subtotal</i>		<i>15</i>
HAZA Hazardous Materials		
01	Gas Pipeline	1
02	General	1
03	Mitigation	1
<i>Subtotal</i>		<i>3</i>
LAND Lands		
01	General	4
02	Rights-of-Way	1
03	Wildfire	1
<i>Subtotal</i>		<i>6</i>
MISC Miscellaneous		
01	General Support for Proposal	4
02	General Non-support for Proposal	5
<i>Subtotal</i>		<i>9</i>



Table 8. Distribution of Public Scoping Comments by Resource Category
(Continued)

Code	Description	Comments
NEPA	NEPA	
01	General	2
02	Connected Action	8
03	Process	3
04	Purpose and Need	7
05	Alternative	11
06	Proposed Action	1
07	Proposed Action Funding	2
08	Cumulative Impacts Analysis	8
<i>Subtotal</i>		42
RECL	Reclamation	
01	General	2
<i>Subtotal</i>		2
RECR	Recreation	
02	Off-Highway Vehicle Use	1
03	Trails	2
<i>Subtotal</i>		3
SOCI	Socioeconomics	
01	General	4
02	Employment	3
03	Economic Growth	3
04	Power Rates	2
05	Environmental Justice	1
<i>Subtotal</i>		13
SOIL	Soils and Geology	
01	Soil Erosion	1
<i>Subtotal</i>		1
SOUN	Soundscape	
01	General	1
<i>Subtotal</i>		1
TRAN	Transportation	
01	General	1
<i>Subtotal</i>		1
VISU	Visual Resources	
01	General	8
02	Cumulative Impacts Analysis	1
03	Visual Simulations	2
<i>Subtotal</i>		11

Table 8. Distribution of Public Scoping Comments by Resource Category (Continued)

Code	Description	Comments
WATE	Water Resources	
01	General	3
02	Groundwater	8
03	Water Use / Quantity	6
04	Cumulative Impacts Analysis	3
05	Water Rights	1
06	Water Quality	1
07	Regulatory Framework	3
08	Mitigation	6
	<i>Subtotal</i>	<i>31</i>
Total		213

4.4 Theme Summary

Individual comments were assigned to one of 15 resource categories (see Table 5) on the basis of the overall theme of the comment. Below is a summary of these themes. Not all comments coded were considered substantive. The primary issues are discussed below.

Air Quality

Comments coded AIRQ-01 (GENERAL) addressed concerns about the emissions from the construction and operation activities associated with the proposed project. This includes requests that the EIS provide detailed discussion of ambient air conditions, National Ambient Air Quality Standards, and criteria pollutant nonattainment areas in all areas considered for solar development. It was also requested that the EIS estimate emissions of criteria pollutants over the lifespan of the projects and specify all emission sources by pollutant. This information should be used to identify appropriate mitigation measures to reduce emissions.

Comments coded AIRQ-02 (DUST) addressed concerns about potential dust generated from construction of the various proposed project activities and the potential human health implications. This included concerns about removal of stabilized soils and biological soil crusts, which may act as abrasive catalysts and erode remaining crusts.

Comments coded AIRQ-03 (CUMULATIVE IMPACTS ANALYSIS) requested that the EIS analyze the cumulative impacts on air quality that may result from the removal of stabilized soils and biological soil crust.

Comments coded AIRQ-04 (GREENHOUSE GASES / CLIMATE CHANGE) addressed concerns about the amount of greenhouse gases (GHGs) generated during construction and the lifespan of the proposed project, including commuter fuel, sulfur hexafluoride (SF6) GHG, and natural gas use associated with the proposed pipeline. Other associated concerns include reduced carbon sequestration associated removal of plants, caliche layers, and biological soil crusts and how projected impacts could be exacerbated by climate change. It was requested that the EIS quantify and disclose the anticipated climate change benefits of solar energy by quantifying GHG emissions from different types of generative facilities, including solar, geothermal, natural gas, coal-burning, and nuclear, and comparing these values.

Comments coded AIRQ-05 (MITIGATION) included a request that the EIS provide a construction emissions mitigation plan that is adopted in the Record of Decision. This plan would adopt all legal requirements and include control measures for fugitive dust, mobile and stationary sources, and administrative controls (see letter number 11 in Appendix D for more details).

Biological Resources

Comments coded BIOL-01 (GENERAL) included concerns about protection of sensitive avian and terrestrial fauna and rare plants.

Comments coded BIOL-02 (SPECIAL STATUS SPECIES) included concerns about impacts to various special status species in the proposed project area. Specific concerns about the area's threatened desert tortoise (*Gopherus agassizii*) population included general impacts to habitat, habitat fragmentation, translocation mortality rates, genetic diversity and maintaining gene flow, and landscape-level analysis. Areas of concern include the Eastern Mojave and Northeastern Mojave Recovery Units.

Other specific species of concern included in the comments are the sage grouse (*Centrocercus urophasianus*), golden eagle (*Aquila chrysaetos*), western burrowing owl (*Athene cunicularia*), phainopepla (*Phainopepla nitens*), banded Gila monster (*Heloderma suspectum*), desert pocket mouse (*Chaetodipus penicillatus*), desert kangaroo rat (*Dipodomys deserti*), pale Townsend's big-eared bat (*Plecotus townsendii pallescens*), forked buckwheat (*Eriogonum bifurcatum*), rosy two-tone beardtongue (*Penstemon bicolor* var. *roseus*), yellow two-tone beardtongue (*Penstemon bicolor* ssp. *bicolor*), white-margined beardtongue (*Penstemon albomarginatus*), Las Vegas Valley buckwheat (*Eriogonum corymbosum* var. *nilesii*), Las Vegas bearpoppy (*Arctomecon californica*).

Requests for design mitigation included adoption of single solid pole structure for transmission line towers to avoid raven predation on the desert tortoise and sage grouse populations (see letter 8 in Appendix D for more details) and development and implementation of a raven/raptor management plan. Other requests include that

- BLM consult widely with the U.S. Fish and Wildlife Service, Nevada Department of Wildlife, and California Department of Fish and Game;
- the EIS include impact analysis and mitigation strategies for areas associated with the Clark County Multiple Species Habitat Conservation Plan and the Boulder City Conservation Easement;
- the EIS include potential impacts on species in the Amargosa River system; and
- the EIS include information on the Nevada Department of Wildlife's Gila monster encounter protocol.

Comments coded BIOL-03 (WILDLIFE HABITAT) included concerns about general habitat impacts from construction, operation, and maintenance of the proposed project. Specific concerns included noise impacts, fencing design and impacts, vegetation clearing for facility construction and roads, and habitat fragmentation. A request for analysis of State of Nevada protected wildlife (Nevada Administrative Code 503) and those of wildlife conservation priority was made. General species listed in the comments included raptors, migratory birds, Gila monster, burrowing owl, and desert bighorn sheep (*Ovis canadensis nelsoni*).

Comments coded BIOL-04 (AVIAN SPECIES) included concerns about impacts to a variety of avian and bat species from construction and operation of the proposed project. Specific concerns included disturbance to raptors during construction (taking nests) and operation of transmission lines, with potential electrocution and collision risks. A comment requested development of an avian and bat

protection plan. Specific species included in the comments were mountain plover (*Charadrius montanus*), northern goshawk (*Accipiter gentilis*), northern harrier (*Circus cyaneus*), long-eared owl (*Asio otus*), short-eared owl (*Asio flammeus*), black swift (*Cypseloides niger*), Lucy's warbler (*Vermivora luciae*), yellow warbler (*Dendroica petechia*), ferruginous hawk (*Buteo regalis*), peregrine falcon (*Falco peregrinus*), whip-poor-will (*Caprimulgus vociferus*), Costa's hummingbird (*Calypte costae*), Calliope hummingbird (*Stellula calliope*), Lewis's woodpecker (*Melanerpes lewis*), Williamson's sapsucker (*Sphyrapicus thyroideus*), willow flycatcher (*Empidonax traillii*), sage thrasher (*Oreoscoptes montanus*), cactus wren (*Campylorhynchus brunneicapillus*), merlin (*Falco columbarius*), American kestrel (*Falco sparverius*), prairie falcon (*Falco mexicanus*), Swainson's hawk (*Buteo swainsoni*), rough-legged hawk (*Buteo lagopus*), osprey (*Pandion haliaetus*), bald eagle (*Haliaeetus leucocephalus*), sharp-shinned hawk (*Accipiter striatus*), and Cooper's hawk (*Accipiter cooperii*).

Comments coded BIOL-05 (WEEDS/INVASIVE SPECIES) included concerns about the potential proliferation of invasive weeds that may result from construction, operation, and maintenance of the proposed project and proposed mitigation measures. Specific concerns included potential impacts to the area's ecology, wildfire risks, herbicide use, and associated environmental impacts. Specific requests included limiting herbicide use and employing other methods to control invasive weeds; developing an invasive weed management plan in the EIS that discloses the quantities and types of pesticides and herbicides proposed for control; and including a discussion of how the EIS meets the requirements on Executive Order 13112.

Comments coded BIOL-06 (CUMULATIVE IMPACTS ANALYSIS) included concerns about potential cumulative impacts to wildlife and wildlife habitat, including habitat fragmentation from the proposed project and additional area projects. This includes other utility-scale renewable energy projects in the area.

Comments coded BIOL-07 (VEGETATION) included concerns about the area's vegetation and rare plants and the potential for direct impacts from development of the proposed project. Comments requested that impacts and mitigation measures be included in the EIS. Specific plants listed in the comments included Aven Nelson phacelia (*Phacelia anelsonii*), rosy twotone beardtongue, yellow twotone beardtongue, white-margined beardtongue, Death Valley ephedra (*Ephedra funerea*), New York Mountains catseye (*Cryptantha tumulosa*), Spring Mountains milk-vetch (*Astragalus remotus*), Nye milk-vetch (*Astragalus nyensis*), Mojave milk-vetch (*Astragalus mohavensis* var. *mohavensis*), and white bearpoppy (*Arctomecon merriamii*). A request was made for BLM to survey the area for listed, sensitive, and S1/S2 plant species that could occur with the project area.

Comments coded BIOL-08 (MITIGATION) expressed concerns about potential project mitigations in the EIS and how those mitigations would be administered and applied to the project, if approved. Specific issues included concerns about using adaptive management or deferred mitigation to expedite area projects and the problems encountered during implementation. Comments recommended that detailed compensatory mitigation proposals be included in the EIS. Use of bird perching deterrents and non-lattice design for transmission structures was recommended. Other recommendations included implementing seasonal construction closures during biologically sensitive periods for wildlife, planning for accommodation of conflicting land use activities such as hunting, and developing protocols for trenching activities to protect wildlife resources. Additional suggested mitigation plans included a bird and bat conservation strategy, raven monitoring, management, and control plan, burrowing owl mitigation, monitoring and translocation plan, desert tortoise relocation / translocation plan, desert tortoise compensatory mitigation plan, and special status plant impact avoidance and mitigation plan.

Cultural Resources

Comments coded CULT-01 (GENERAL) expressed concerns about general impacts and mitigation to cultural resources from the proposed project. These included questions about how cultural sites would be avoided, destroyed, or archived. Specific issues included the Pahrump Paiute Tribal Ancestral Homeland Territory in the proposed project area, discussion of Executive Order 13007, and protection of Indian sacred sites in the EIS.

Comments coded CULT-02 (HISTORIC TRAILS) included concerns about how the proposed project would impact the Old Spanish National Historic Trail. Questions about potential impacts to the Pony Express Trail and the California National Historic Trails were also included in the comments.

Comments coded CULT-03 (TRIBAL RESOURCES) expressed concerns about impacts to Paiute artifacts and Paiute burial sites.

Comments coded CULT-04 (CUMULATIVE IMPACTS ANALYSIS) included concerns about cumulative impacts to cultural sites from the proposed project and other energy projects in the area.

Comments coded CULT-05 (TRIBAL CONSULTATION) requested that the EIS describe the process and outcome of tribal consultation and how issues raised were addressed in selection of the proposed alternative.

Hazardous Materials

Comments coded HAZA-01 (GAS PIPELINE) expressed concerns about the gas pipeline included in the proposed project and potential public safety issues. Issues included potential public safety hazards associated with unmanned stations and questions about facility operation and maintenance.

Comments coded HAZA-02 (GENERAL) included a request that the EIS address potential direct, indirect and cumulative impacts of hazardous waste from construction and operation of the proposed transmission and other facilities. As requested, the document should identify projected hazardous waste types, volumes, expected storage disposal, and management plans.

Comments coded HAZA-03 (MITIGATION) included a request that the EIS include mitigation measures to reduce hazardous waste generation and recommended including the use of fewer toxic materials.

Lands

Comments coded LAND-01 (GENERAL) included concerns about how the proposed project would support or conflict with federal, state, tribal, or local land use plans, policies, and controls in the project area. Concerns about how the proposed project would impact the area land use, availability of private lands, and associated infrastructure were also included.

Comments coded LAND-02 (RIGHTS-OF-WAY) questioned the size of required ROWs and the adequacy of the landscape terrain to accommodate the proposed transmission lines. Specifically, the issue was raised whether the area of McCullough Pass would provide enough space for the transmission line ROW.

Comments coded LAND-03 (WILDFIRE) expressed concerns about the potential for wildfires caused by malfunction of the proposed transmission lines. Specific questions included who would be the responsible party in the event of a wildfire from the proposed project and concerns about the financial burden placed on local fire departments.



Miscellaneous

Comments coded MISC-01 were in opposition to the proposed project.

Comments coded MISC-02 were in support of the proposed project.

NEPA

Comments coded NEPA-01 (GENERAL) included general NEPA suggestions and concerns.

Comments coded NEPA-02 (CONNECTED ACTION) included concerns about the Hidden Hills solar facility and how it would be evaluated in the EIS process. It was suggested that the EIS process needs to analyze and disclose the impacts to the environment from the solar facility. A request was made that all relevant data be shared between the two projects for synthesis of environmental impacts.

Comments coded NEPA-03 (PROCESS) included concerns about NEPA processes. These included concerns regarding late notification about the scoping meetings, a request for official consultation from the Goodsprings Historical Society, and the stated lack of necessity for amending the Las Vegas Resource Management Plan (RMP). It was suggested that the EIS include discussion of how the RMP can accommodate the number of potential future energy projects made possible by the proposed project.

Comments coded NEPA-04 (PURPOSE AND NEED) contained questions and concerns regarding the purpose of and need for the proposed project. There were questions about the necessity of the proposed project in the event that the solar plant were not built, whether the transmission lines could be located in California, and where the power would be distributed. It was suggested that the purpose and need statement reflect the need to protect sensitive avian and terrestrial fauna, rare plants, and cultural sites.

Comments coded NEPA-05 (ALTERNATIVE) included comments suggesting alternatives to the Proposed Action and recommendations for developing alternatives to the Proposed Action. Specific alternatives suggested locating the transmission line facilities in existing transmission corridors or ROW, creating multiple circuit structure alignments in anticipation of future utility projects, locating the transmission lines in California, including an alternative that does not include the Hidden Hills tap line, locating the gas pipeline in California, and an alternative that designates the Hidden Hills transmission ROW as an “Energy Development Free Zone.” Recommendations for alternative development included locating the transmission lines away from sensitive areas and considering options such as downsizing the proposed project within the project area and/or relocating sections of the project to other areas, including private land, to reduce environmental impacts.

Comments coded NEPA-06 (PROPOSED ACTION) suggested that any Proposed Action ROW corridor should follow existing approved or agreed-upon routes.

Comments coded NEPA-07 (PROPOSED ACTION FUNDING) questioned how the proposed projects are funded and whether any federal subsidies are being given to the project developers.

Comments coded NEPA-08 (CUMULATIVE IMPACTS ANALYSIS) included concerns about how potential impacts from the proposed project would add cumulatively to impacts from past, present, and future projects in the area. Specific concerns included “industrialization of the desert” and how the proposed project would facilitate future energy development projects and general development of the area. Concerns about the size and capacity of the proposed facilities, including the gas pipeline and transmission lines, and the potential for multiple future energy development projects stemming from the proposed project were expressed. Specific areas mentioned regarding cumulative impact analysis for growth included Charleston View and Amargosa Valley. It was suggested that trend data be used to

establish a baseline for resources to evaluate historic impacts and future impacts (see letter 11 in Appendix D for more details).

Reclamation

Comments coded RECL-01 (GENERAL) expressed concerns about the difficulty and long time frame required to conduct reclamation in the desert landscape. A comment requested that the EIS include a requirement for a decommissioning and site restoration plan.

Recreation

Comments coded RECR-02 (OFF-HIGHWAY VEHICLE USE) included concerns about encroachment into off-highway vehicle (OHV) use areas and about the cumulative impacts of shrinking OHV areas and OHV events in the region.

Comments coded RECR-01 (TRAILS) expressed concerns about impacts to the area's recreational trails. Specifically, the transmission corridor runs along the planned Yellow Pine Rails to Trails project.

Socioeconomics

Comments coded SOCI-01 (GENERAL) contained concerns about the potential costs and benefits to the region's economy and social infrastructure.

Comments coded SOCI-02 (EMPLOYMENT) included comments discussing the beneficial economic impact of the proposed project through the creation of jobs in the region.

Comments coded SOCI-03 (ECONOMIC GROWTH) included comments discussing the beneficial economic impact of the proposed project for economic growth. A request was made that the EIS include a discussions on where the materials for the solar plant and transmissions lines would be manufactured, and if this is occurring overseas, how it impacts the quantity of jobs created in this area.

Comments coded SOCI-01 (POWER RATES) included concerns about what the proposed project would do to the area's power rates.

Comments coded SOCI-01 (ENVIRONMENTAL JUSTICE) included a request for the EIS to evaluate the environmental justice populations with the geographic scope of the projects.

Soils and Geology

Comments coded SOIL-01 (SOIL EROSION) expressed concerns about removal of stabilized soils and biological soil crust and soil erosion.

Soundscapes

Comments coded SOUN-01 (GENERAL) included concerns about how the proposed project construction noise would impact wildlife and residential areas.

Transportation

Comments coded TRAN-01 (GENERAL) expressed concerns about transportation impacts and safety on roads in the project area. Specific concerns about the heavily trafficked Goodsprings Road were included.

Visual Resources

Comments coded VISU-01 (GENERAL) included concerns about impacts to visual resources from the proposed project. Specific concerns included visual impacts from road corridors, including Tecopa Road. A comment requested that the EIS evaluate the entire project corridor using Visual Resource Management Class I standards because of the size of the project.

Comments coded VISU-02 (CUMULATIVE IMPACTS ANALYSIS) expressed concerns about the cumulative impact of multiple energy projects and transmission lines on the visual landscape.

Comments coded VISU-03 (VISUAL SIMULATIONS) included a request that the EIS include key observation point (KOP) visual simulations that depict all of the visual impact scenarios of the proposed project. Requested KOP visual simulations included residential areas near Sandy Valley and Calvada Springs; Stump Spring Area of Critical Environmental Concern; from six locations in the Toiyabe National Forest; from the south end of Red Rock National Conservation Area; from both the North McCullough and the South McCullough Wilderness Areas; and if red aviation lights will be used on any part of this transmission line, a dark skies KOP simulation.

Water Resources

Comments coded WATER-01 (GENERAL) included concerns about general adverse impacts to water resources from the proposed project. These included impacts to aquatic features and a request for fencing design standards that protect water resources.

Comments coded WATER-01 (GROUNDWATER) expressed concerns about long-term impacts, water supply, monitoring, and mitigation of sustained groundwater pumping. Concerns were expressed regarding potential impacts to the Amargosa River because of the potential groundwater connection to the Pahrump Valley. Comments requested that the EIS include a detailed model of groundwater connections between the Pahrump Basin and Amargosa River–Death Valley System and a discussion of availability of groundwater within the basin and annual recharge rates.

Comments coded WATER-01 (WATER USE / QUANTITY) requested that the EIS include a detailed discussion of the amount of water needed for the proposed project and where the water would be obtained from. Specific issues from the comments included questions about how much water would be used for dust control and construction activities, a discussion of available technologies to minimize water use or recycle water, a description of all water conservation measures, identification of other feasible sources of water, and a description of water availability relative to climate change.

Comments coded WATER-01 (CUMULATIVE IMPACTS ANALYSIS) included concerns about cumulative impacts to the areas water resources from the proposed project and additional energy projects that could result from the proposed project. Comments requested a cumulative analysis for water use for all potential energy projects that could use the proposed transmission lines. A cumulative analysis of the groundwater supply within the hydrographic basin relative to other energy projects in the area was requested. In addition, a request was made to analyze the potential cumulative impacts to the Amargosa Wild and Scenic River.

Comments coded WATER-01 (WATER RIGHTS) requested that the EIS include a description of the water rights permitting process and the status of water rights within the basin and an analysis of potential over-allocation.

Comments coded WATER-01 (WATER QUALITY) requested that the EIS discuss the potential effects of project discharges on surface water quality.

Comments coded WATER-01 (REGULATIONS) included comments discussing relevant water resource regulations and their application in the EIS process. It was requested that the EIS document the project's consistency with stormwater permitting requirements, consultation with the U.S. Army Corps of Engineers to determine the presence of jurisdictional waters, and identification of any impaired waterways.

Comments coded WATER-01 (MITIGATION) recommended that the EIS include specific mitigation strategies to reduce impacts to water resources. This included mitigation to avoid degrading impaired waterways, mitigation for all aquatic features, and specific mitigation for desert washes, potential compensation lands, and water withdrawals.

5.0 FUTURE STEPS IN THE EIS PROCESS

The BLM will use the comments collected during scoping to define issues and to develop a range of alternatives to address those issues, which will then be analyzed in the EIS. The impacts that could result from implementing the alternatives will be analyzed and documented in a Draft EIS.

The Draft EIS will be made available for public review and is currently scheduled for publication in June 2012. The availability of the Draft EIS will be announced in the *Federal Register* and advertised in the local and regional media. Public comments will be accepted for 45 days, during which public meetings or hearings will be held to receive comments on the adequacy of the Draft EIS. The BLM will review and consider all comments received on the Draft EIS. The document will be modified as appropriate based on public comments; all substantive comments and responses will be incorporated into the Final EIS.

At this time, the Final EIS is scheduled to be released in December 2012. The availability of the Final EIS will be announced in the *Federal Register* and advertised in local and regional media. A Record of Decision selecting the alternative to be implemented will be made by the U.S. Department of the Interior no sooner than 30 days after the date on which the Notice of Availability of the Final EIS is published in the *Federal Register*.

