

Private Citizen/Individual's Written Comments

April 17, 2012

BLM, Las Vegas Field Office
Attn: Greg Helseth, Renewable Energy Project Manager
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COMMENTS ON SEARCHLIGHT WIND ENERGY RIGHT-OF-WAY APPLICATION

Dear Mr. Helseth:

As a concerned citizen, a resident of Southern Nevada, and a landowner in the impacted Searchlight area, I am respectfully requesting that the Bureau of Land Management DENY the right-of-way application submitted by the Searchlight Wind Energy Project (NVN-084626).

After reviewing the DEIS for this project, I am convinced that approving the application would violate both commonsense and the BLM's obligation to the citizens of the United States to "sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations." The wind farm project will be nothing short of a death sentence, both economically and biologically, for the Mohave Desert and the town of Searchlight.

The only conclusion the BLM should reach for this project is that of an outright denial of the ROW application!

Summary

1. This document states there are no "Environmental Justice Issues". The turbine noise, ruining the pristine view shed, the amount of water to be used for this project to construct the bases of the turbines is not responsible environmental stewardship. This impacts local tourism, retired residents, and future development to the community.
2. This document states that the project is beneficial. No one wants an industrial wind farm in their backyard. This is not "beneficial" to Searchlight, a small, rural community that supports outdoor recreation. Even the wind rates are questionable.
3. Nearly all of the statistics used in the DEIS are outdated and/or obsolete. Current (2010) census data, as well as recent socioeconomic trends in population and real estate prices are readily available and should be used. The outdated data does not provide an accurate picture of the local population and economy, which has been more drastically-affected by the recession than other areas of the United States.
4. Several parcels on Oregon Trail Road were left out of the evaluation process. These properties are the closest to the turbines and will, therefore, suffer the most from the effects. A fair and accurate report can NOT be created without including these parcels!

Comment noted.

Comment noted.

Section 4.12-Socioeconomics has been updated to use 2010 Census.

All private property information was obtained from the BLM and confirmed with the Clark County Assessor's office. All properties on Oregon Trail Road were included in the EIS. Additionally, it was brought to the BLM's attention that the VTN map presented at public scoping meetings did not include this information.

5. The applicant has a long history of leaving citizens and local governments "holding the bag" for road repairs, taxes, and other costs that were originally touted as "benefits" to the community. Although the BLM's main focus is the government-owned land, as a taxpayer-supported agency it also has an obligation to protect its employer – the citizens of the United States!
6. The applicant does not have a purchase agreement, or even a letter-of-intent, from any utility to buy the power it proposes to generate. This is a classic case of "if you build it, they might come" mentality! The applicant proposes to spend billions of dollars, including taxpayer funds for the BLM's role in this project, to generate electricity no one plans to buy. The original proposal included sending the power to California (NOT to Nevada, so no benefits to us there, either). However, California recently announced it will no longer need to purchase renewable energy from outside the state and will, in fact, be SELLING power it generates!
7. Searchlight depends on a VOLUNTEER fire department, ill-equipped to handle large industrial turbine caused fires, which can quickly spread over thousands of acres of rough terrain. The nearest BLM Fire Station is at Hole in the Wall, in California. Clark County has small fire stations in Laughlin and Boulder City. None of these facilities is less than 45 minutes to one hour away under ideal traffic conditions. Under the often dry, windy conditions present, the entire town and nearby residences could be wiped out before adequate fire-fighting capacity arrived.

I respectfully request that the BLM deny the right-of-way application submitted by the Searchlight Wind Energy Project (NVN-084626). This project is bad for the environment, bad for the citizens, and

Respectfully,



Ellen Ross
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Comment noted.

Comment noted.

As described in 4.14-Health and Human Safety Impacts; To reduce fire risk, the Applicant would construct a 20-foot-wide firebreak on the exterior of the perimeter fencing surrounding the O&M building and the proposed substations, in addition to a 20-foot wide firebreak surrounding individual WTG locations (APM-7). Shrubs and other large vegetation would be removed from the firebreak. Grading or discing would maintain the firebreak.

The electrical equipment enclosures that would house the transformers would be either metal or concrete structures. Any fire that could potentially occur would be contained within the structures, which would be designed to meet National Electrical Manufacturers Association standards for electrical enclosures (APM-14). The EIS contained a detailed description of the potential effects in 4.14-Health and Human Safety Impacts.

Additionally, mitigation measure included as an inherent element of the project, APM-7, is for development and implementation of an Emergency Response Plan that would include fire suppression and control.

SECTION 1

Page 1-6, Para. 1.3.1, line 35: The Searchlight wind farm is not representative of *environmentally responsible renewable energy*. There is nothing environmentally responsible about siting a wind farm in pristine desert adjacent to a national recreation area (LMNRA), and in close proximity to six wilderness areas.

Comment noted.

Page 1-9, Table 1-1: Of the 20 “Potentially Affected Resources”, sixteen resources (80%) will be negatively impacted by the destruction of the pristine desert. This is not good environmental stewardship!

Comment noted.

Page 1-10, Special Management Areas: The proximity of a large heavy industrial project adjacent to ACEC’s, SMA’s, wilderness areas, and the LMNRA is not an example of the BLM’s mandate to provide environmental stewardship, nor is it good for eco-tourism.

Comment noted.

SECTION 2

Page 2-15: The substation and laydown area should be set back further from Cottonwood Cove Road. People do not vacation at Cottonwood Cove to see industrial development. This is not good environmental stewardship.

Comment noted.

Page 2-18, line 23: What is the follow-up plan for re-landscaping after construction is completed? This is an area where people live and recreate. When disturbed areas along nearby U.S. 95 were re-vegetated” after construction activity, fully ninety percent (90%) of the transplanted plants died. This is not good environmental stewardship.

Refer to MM-BIO-1 – Interim Reclamation and MM-BIO – Cactus and Yucca Salvage Plan for a description of mitigation measures.

Page 2-21, Line 12: Have any geotechnical investigations been done thus far? The granitic bedrock in the Searchlight area may be too difficult to excavate or blast, and adequate foundations would be too costly to construct. Not a good idea...

No ground-disturbing geotechnical investigations have been completed to date. Refer to in Section 2.3.1- General Features of the Proposed Project for a description of geotechnical activities that would be completed as part of the proposed project.

Page 2-28, Construction Workforce: Where will the 250-300 construction and privately-owned vehicles used by the workmen be parked while they are on-site?

All project related activities, including parking, would be limited to the ROW. This would be a requirement in the ROD and/or ROW grant. Generally parking would be limited to the laydown and staging areas.

Page 2-28, Para 2.3.3: The construction of wind turbines with flashing lights would destroy the clear night sky and the rural environment. According to the DEIS, each WTG would have two lights, which flash day and night. That would be a total of 174 flashing lights in the previously dark sky. This is not environmental stewardship.

Comment noted.

Page 2-29, line 34/35/36: To where will the construction waste and refuse be hauled? The Searchlight drop station is already inadequate for existing use, and could not accommodate waste from a commercial operation.

If Searchlight cannot accept the volume of waste generated by the facility, the waste would be hauled off-site to a licensed waste management facility. Please refer to APM-8 and Section 4.15.14- Human Health and Safety for a discussion of mitigation measures. A Waste Management Plan would be a stipulation of the ROW grant.

Page 2-30, Para. 2.3.7: The “Re-grading and re-vegetation” plan is not comprehensive. Desert plants require watering for a year after transplant. If the project is decommissioned, who will be responsible for the care of the vegetation for that year? Newly-planted desert plants die without care and water. This is not good environmental stewardship.

Comment noted.

Page 2-30, Para. 2.3.8: The area of the proposed turbines is home to several dozen Bald Eagles, Golden Eagles, and Turkey Vultures. Vultures are particularly vulnerable to “death by turbine” because of their flight patterns. California wind farms are killing Golden Eagles by the hundreds. Knowing this, why

Refer to Appendix B-4: Bird and Bat Conservation Strategy for a risk assessment for birds utilizing the USFWS Land-Based Wind Guidelines.

would the applicant attempt to build a wind farm in an identified vulture and eagle habitat? Again, this violates the BLM's mission of good environmental stewardship!

Page 2-37, APM-2, Excavation/Grading. Yucca, cholla, and Joshua trees will be removed and placed in a nursery for transplanting, or as stated, "Organic matter will be mulched."?? Some of these plants are hundreds of years old. How can the BLM issue a ROW condoning this amount of destruction of pristine desert? This is not good environmental stewardship.

Page 2-39, APM-11, Aeronautical considerations. What consideration is given to plans to build homes and businesses around the airport? The necessary infrastructure has been installed. If and when the economy turns around, this project would be viable. However, if the wind turbines are built, the airport project will never be built.

Page 2-43, MM BIO-3: The DEIS states "Desert tortoise fencing would be installed around Western's proposed switching station." Will the roads and WTG pads also have tortoise fencing? The high number of tortoises counted in the area would indicate that ALL areas of construction should be fenced. Why would the BLM approve such a project in an area of KNOWN high tortoise population? This directly violates the BLM's responsibility to provide good environmental stewardship.

Page 2-44, MM BIO-5. Sixteen varieties of bats are found in the area. How will their roosts in mine shafts and natural caves be monitored during blasting and construction to ensure that no disturbance is taking place? How will the disturbances affect the populations that currently roost in those shafts and caves?
This is not good environmental stewardship.

Page 2-46, MM TRAN-1, Traffic Management Plan. The DEIS states "To further reduce effects to the US-95/ Cottonwood Cove Road intersection, the Plan will identify an alternate access route to the Proposed Project site during peak construction if possible." I suggest the "planners" look at a map of the town of Searchlight. The only "alternate routes" would be through residential areas with roads even narrower than the 24-foot wide Cottonwood Cove Road. These narrow side streets also have 90-degree turns that would not accommodate construction traffic. I do not believe there is any alternate route in Searchlight.

Page 2-48, Para. 4.12 – Socioeconomics. Very difficult to believe that applicant can make a statement that is so totally false. Property values will plummet even further than they already have; residents will move away; tourism will dwindle; local businesses dependent on tourism will fail; and the small town of Searchlight will never be able to expand beyond its present size. No one will develop anything other than more wind turbines, or possibly a hazardous waste dump, close to wind turbines that stand 430 feet tall, create 24-hour per day noise, despoil the viewshed, and have flashing lights day and night. This is total devastation for the town of Searchlight, "... the gateway to popular Lake Mohave in the Lake Mead NRA."

As a realtor, I work in and around the Las Vegas and Searchlight areas. Land prices are down 90%; residential property prices are down 70%. Wind turbines will kill real estate sales along with the birds. Your evaluation is totally off-base and lacks environmental stewardship.

In addition, the project map prepared by VTN dated 11-10-2009 neglects to show a number of private holdings located at the northwest part of the project. There are approximately six different landowners there, and at least six occupied residences. Why are these not shown on the project drawings?

Comment noted.

BLM had considered effects to aviation in Section 2.2-Action Alternatives Considered But Not Analyzed in Detail which contains a discussion how public and FAA representatives concerns regarding the potential impacts on public safety and airport operations from the WTGs sited nearest to the Searchlight Airport resulted in BLM eliminating alternatives that would potentially adversely affect airport operations.

Future airport development would be subject to Federal Aviation Authority regulations including Compatible Land Use, per 14 FAR Part 150 which provides that the general rule on residential use of land on or near airport property is that it is incompatible with airport operations because of the impact of aircraft noise and, in some cases, for reasons of safety, depending on the location of the property.

Fencing around the WTG pads and roads are not currently proposed. Tortoise fencing along roads would fragment tortoise habitat. Ultimately mitigation measures for the desert tortoise are determined by the USFWS and issued in the Biological Opinion, which is included in Appendix B-2: USFWS Biological Opinion.

A Bird and Bat Conservation Strategy (BBCS) (formerly referred to as an Avian and Bat Protection Plan [ABPP]) was developed for the project, which follows the guidelines of the recently published USFWS Land-Based Wind Guidelines (Appendix B-4: Bird and Bat Conservation Strategy).

Text regarding an alternate access route has been removed from the EIS.

Section 4.12-Socioeconomic Impacts has been updated to include Impacts on Property Values. A literature review on property value impacts has been added in Appendix F: Literature Review of Socioeconomic Effects of Wind Project and Transmission Lines.

Page 2-49, Fire prevention: The small volunteer fire department in Searchlight is not equipped to fight the types of fires created by failed wind turbines. As an owner of property on the Oregon Trail, I am opposed to heavy commercial vehicles using this access road.

SECTION 3

Page 3-5, Para. 3.1.2.8, Line 13: "The soils in the Searchlight area are susceptible to erosion by wind and water." Wind erosion will be a problem for the life of the project, and beyond, not just during construction. High dust is already an issue in Eldorado Valley, where drivers lose visibility on a windy day. Once the amount of destruction of desert vegetation and the natural crust of the soil surface necessary for the proposed project has taken place, the area will likely be a dust bowl.

Applicant should also consider the potential for respiratory illnesses occurring in local residents, resulting from the dust. Many of the local residents are elderly and susceptible to respiratory diseases; some even moved to Searchlight to escape air pollution in other parts of the country. There also exists a real possibility for outbreaks of Valley Fever. As recently as 2009 a person in Boulder City contracted Valley Fever simply by being near a construction site on a windy, dusty day.

There are reports of recent cases of Valley Fever in areas of Southern California deserts that are being stripped of vegetation for the installation of wind and solar projects.

Page 3-35, Para. 3.5.2.1 Previous Archeological Investigations, lines 36-37: Will the remaining five sites be evaluated prior to any construction taking place? Elders from the Mohave and Chemehuevi Tribes have stated that they have not had the opportunity to walk the proposed project site to identify cultural resources. Both are in agreement that there are ancient trails transecting the site. Have these trails been identified? The project is in the viewshed of Spirit Mountain, which is a sacred site. Further investigation and mapping of trails and prehistoric sites in the area should be performed. More outreach to the Colorado River Indian Tribes needs to be done, to insure that sacred, historical and unmapped archeological sites are not damaged or destroyed.

Tribal representatives are not in favor of a wind farm within the view shed of Spirit Mountain.

Page 3-44, Para. 3.8.2 Existing Environment: The DEIS states there, among other uses, "... limited livestock grazing..." There is NO livestock in this area! All cattle, burros and wild horses were removed many years ago.

Page 3-44, Para. 3.8.2.1 Land Ownership: What compensation will be given to the private owners of the small parcels totaling approximately 644 acres? These people bought their land with the understanding they would be able to have the quiet enjoyment of their property in a remote, unspoiled area. Others bought with the intention of building homes in the future, or perhaps to speculate on the land. The land in proximity to the turbines will now be seriously devalued. If applicant argues that value will not be affected by the presence of the turbines, then applicant should be willing to buy out these landowners at the owner's purchase price or negotiated price, whichever is greater. Destroying the view shed and environment with wind turbines will decrease the already depressed land value by yet ANOTHER 50%! This is not only environmentally irresponsible, it is economically disastrous!

Page 3-45, Para. 3.8.2.2 Governing Land Management Plans: The DEIS states the project is located in an area under the jurisdiction of the 1998 Las Vegas RMP and ROD (BLM 1998), as amended by the 2005 Wind Energy Development document. The 1998 RMP is currently under revision; the DEIS for the revised RMP is supposed to be available this Fall. Is this statement still true? Which RMP will govern?

Comment noted.

During construction Searchlight Wind Energy, LLC would be required to use an approved dust control measures to lesson blowing soil. After construction is complete disturbed areas would be revegetated.

The project emissions will not exceed the NAAQS and Clark County DAQ air quality standards described in Section 4.6- Air Quality Impacts.

According to the Center for Disease Control in 2010 there were over 16,000 reported cases of Valley Fever (i.e. coccidioidomycosis), the majority of which were located in Arizona and California (Accessed July 3 2012 at:

<http://www.cdc.gov/fungal/coccidioidomycosis/statistics.html>).

According to the University of Arizona's Valley Fever's Center for Excellence, two-thirds of all infections in the United States occur in Arizona, mostly in the urban areas surrounding Phoenix and Tucson. (Accessed on line July 3, 2012 at:

<http://www.vfce.arizona.edu/GeneralInfo/default.aspx>).

This research suggests that although Valley Fever may occur in Nevada, it is not as likely compared to other parts of the southwest. This statement is supported by the information available from Southern Nevada Health District which documents less than 10 cases per year of Valley Fever have been reported in Clark County, Nevada to date (2009-2012) (accessed online July 4, 2012 at:

<https://www.southernnevadahealthdistrict.org/stats-reports/disease-stats-jan12.php>).

Searchlight Wind Energy LLC has modified their project to eliminate one access road and moved one wind turbine to avoid impacting National Register of Historic Places (NRHP)-eligible features on three sites. Only one prehistoric site has been determined NRHP-eligible and it would be impacted by this project. As a mitigation measure to reduce any unnecessary impacts to eligible as well as ineligible cultural resources within the Area of Potential Effect, an archaeological monitor, will be present during road construction and improvements to aid in avoiding NRHP-contributing features as well as other recorded prehistoric sites and mining features in historic sites in the Project area.

Reference to livestock grazing has been removed from the EIS.

The Las Vegas RMP, approved October 5 1998 is the governing document for this project, along with any other approved planning or programmatic document covering this field office or project type. The revised (Las Vegas) RMP Record of Decision is not anticipated until the summer of 2014.

Page 3-48, Duke Energy Rights of Way: Acreage listed differs from that stated elsewhere in the DEIS. This table states 24,382.56 acres; elsewhere the project is described as 18,949 acres. Which is correct?

Page 3-48, Southwest Gas Corp. Rights of Way: Has applicant gotten permission from Southwest Gas to build a road on/adjacent to the high pressure gas pipelines? As stated earlier, building roads and transporting heavy construction equipment over a shallow-buried high-pressure gas pipeline will present a major safety hazard, as will excavation for underground collection lines.

Page 3-58, VRM map: The views of Spirit Mountain and Lake Mohave are unique. Likewise, expansive views of Joshua tree woodlands and forests of Teddy Bear Cholla are equally beautiful in our area. Local residents and tourists find the Mohave a special place. I am insulted by the lack of concern for this desert community.

Page 3-60, Para. 3.9.4.2 Landscape Characteristics: A quote from this paragraph is as follows: "The landscape is panoramic, and expansive vistas of distant mountains are common." This sums up the beauty of the desert. However, a panorama intruded upon by 430 foot tall wind turbines is virtually destroyed for all who live in and travel through the region. This is not environmental stewardship.

Page 3-60, Para. 3.9.4.5 Lake Mead Recreation Area. Park visitation at Cottonwood Cove is stated at over 300,000 annually. All 300,000 visitors arrive at Cottonwood Cove via Cottonwood Cove Road. An 8 to 12 month construction period would financially destroy the concessionaire at Cottonwood Cove, and much of the tourism that comes through Searchlight. Applicant should perform an economic analysis to quantify the revenue lost by the concessionaire, the National Park Service, and all Searchlight businesses that are dependent on tourism. The lost business would also result in a loss of sales tax revenue for the county and state.

Page 3-60, Para. 3.9.4.7 Dark Skies: Finding a location near any major city with dark skies is very difficult. At present, the area around Searchlight has skies dark enough to permit star gazing. Boaters on Lake Mohave are also able to enjoy the beauty of starlit skies without the intrusion of heavy industry. If the project is built the lighting on the turbines will destroy the dark skies in the area. This is not good environmental stewardship.

Page 3-80 Noise

While the data presented appears to be impressive, other countries have been studying noise emitted by WTG's for longer than the U.S. Wind farm studies have determined that the types of noise and vibration created by wind turbines are unique. These have been shown to have serious negative effects on the health of nearby residents, and cannot be measured with traditional methods of measurement. This is not good environmental stewardship.

Applicant needs to research and incorporate data from studies done within the past two years that apply specifically to industrial scale wind turbines. The mere fact that applicant requested and was granted a variance to increase the allowable noise level for the project area by sixteen percent (16%) indicates that applicant knows that wind turbines create noise that will affect the local environment.

Articles and studies are available where residents living near wind farms alternately describe the effect as "living next to a jet engine that revs up but never takes off"; or "sounds of thumping like tennis shoes in a clothes dryer". Residents also complain of throbbing heads and chests from the sounds and vibrations that are inaudible but felt throughout their body (infrasound).

The correct acreage for the proposed project area is 18,949 acres of BLM-managed land. The proposed project components would only be on BLM-managed lands. The total from Table 3.8-2. ROWs within or adjacent to the Proposed Project Area is from a database that has not been corrected to reflect the actual ROW.

Southwest Gas Corporation holds a ROW grant from BLM for an existing gas line within the project area. BLM ROW grants are non-exclusive. BLM Reserves the right to grant other actions within a ROW area. Searchlight Wind Energy LLC would be required to coordinate its construction and operational activities with existing adjacent ROW holders to facilitate their continued safe operations.

Comments noted.

Section 4.12-Socioeconomic Impacts has been updated to include potential effects on recreation and tourism.

Section 4.9-Visual Resources Impacts states that while some lighting will be necessary to comply with FAA regulations, it will be minimal and would not contribute to sky glow or glare.

Comment noted. The modeling study conducted for this project is the accepted standard for NEPA analysis. Refer to Section 4.10.2-Direct and Indirect Effects by Alternative for the explanation of conservative assumptions that were used in the noise modeling analysis.

The applicant's representative at the Searchlight public information meetings, Robert Charlebois, characterized noise from wind turbines as "sounds like raindrops falling on leaves" or "sounds like your refrigerator running." These comments are false and meant to deceive those people whose communities will be forever altered by Duke Energy's plans. Their quiet enjoyment of their rural lifestyle can never be destroyed.

The "Region of Influence" studied was within two miles of private property. Some of the residences are only one-quarter mile from the turbines. These residences will, no doubt, not be fit for human habitation due to noise if this project is built. The turbines should be no less than three miles from any residence. **My property is located approximately 800 ft from turbine #1.**

Additionally, studies have shown that under certain atmospheric conditions, noise from WTG's can be heard for 15 kilometers (approximately nine miles). This range would include Lake Mead National Recreation Area at Cottonwood Cove; the Sprit Mountain Wilderness Area; and all of the communities of Searchlight and Cal-Nev-Ari. This is not good environmental stewardship.

Page 3-84, Para 3.10.2.3 Surrounding Land Uses and Potential Noise-Sensitive Receivers. The first paragraph lists locations of nearby residents, but does not mention the homes off Oregon Trail Road. Why? These are the people who live the closest and will be most impacted by the project. These are also the same properties that do not show up on the 2009 map indicating private property parcels as outlined and shaded areas.

Several of these parcels were also omitted from Table 4.10-4. Predicted Operation Noise – 87 WTG Layout Alternative. The table estimates expected noise levels at other nearby private property parcels.

The paragraph also states that no residences are closer than 1000 feet from turbines. Many communities are placing setback for wind turbines from residences at two kilometers (1.2 miles). Just because Clark County does not have this restriction does not mean it should not apply to the residents of the community of Searchlight. Applicant should be required to redesign the project to meet the 2 kilometer setback from ALL private property.

Page 3-86, Para 3.10.2.4 Ambient Sound in the Project Area Vicinity, Line 12: The DEIS uses data from the 2000 Census. A census was conducted in 2010. Twelve year old data, given the changes in the country's economy and population in the past five years, is irrelevant. The DEIS should use current data in its review, or the conclusions drawn will not be accurate.

Page 3-88, Para 3.11.22, Existing Environment, lines 28 – 35. This paragraph presents a very accurate description of the existing use of the area, and the reason people choose to live and recreate here. The BLM is seriously misguided to even consider allowing heavy industrial development in the area described as: "... attract[ing] recreation visitors seeking a primitive recreation experience of natural beauty, solitude, and freedom from the regulations of structured urban environments."

The only Alternate that BLM should consider for this area is that of "No Action"; meaning no project.

Page 3-92, Para. 3.12.2 Existing Social Conditions: As of January, 2012, applicant did not have a power purchase agreement (PPA) with any buyer. The state of California is providing its own renewable energy. Arizona is on track to meet its RPS. If applicant does secure a power purchase agreement with a utility in another state, I fail to see how that will benefit the residents of Southern Nevada. Any tax

No peer reviewed scientific studies indicate wind turbine sound being audible at a distance of 15 kilometers over land. See noise modeling presented in Section 4.10.2-Direct and Indirect Effect by Alternative for discussion on the conservative projected noise levels in the area. These models are considered conservative because the model assumes that all receptors are downwind of the noise sources simultaneously, which a physical impossibility but one that results in a conservative calculation of maximum expected sound levels.

No peer reviewed scientific studies that indicate wind turbine sound being audible at a distance of 15 kilometers over land.

Section 3.10.2.3-Surrounding Land Uses and Potential Noise-Sensitive Receivers, has been updated to include residents on Oregon Trail Road.

The noise modeling analysis included residential properties that were nearest to any wind turbine locations. Parcel 2432400010, which was included in the analysis, is closer to a wind turbine than parcel 2432400011. Similarly, Parcel 2432400021, which was included in the analysis, is closer to a wind turbine than parcel 2432400012.

Comment noted.

The census data has been updated to the 2010 data, which resulted in a change in this section from 576 to 555. The change did not change the results of the analysis.

Comment noted.

Comment noted.

benefits to the county and state would be offset by loss of wildlife habitat, loss of recreation opportunities, and the loss of rural lifestyle, no matter where the expensive wind power is sold.

Page 3-94, Para. 3.12.2.1 Community Setting: This is an accurate description of the area. Particularly important is the recognition of Searchlight as “. . . the gateway to popular Lake Mohave in the Lake Mead NRA.” This further enforces the obvious conclusion that this area is not an acceptable site for an industrial scale wind farm. BLM should not grant a ROW for this project.

Comment noted.

Page 3-94, Para. 3.12.2.2 Demographics and Social Trends, and Table 3.12-1 Population Statistics. Once more, why is 2010 Census data not incorporated? If the projections for 2013 are based on data from 1990 through 2008, they are way off the mark. Population peaked in Clark County in approximately 2007-2008, and has since declined. DEIS should be revised to reflect actual Census data for 2010, and projections recalculated through 2015.

Data updated to 2010 Census and 2016 projections.

Page 3-97, Tables 3-12-2 and 3-12-3: The data used in these tables is 12 years old. They should be redrawn, using 2010 Census statistics.

Page 3-98, Para. 3.12.2.3 Area Housing Characteristics: Use of data for housing prices from 2008 is totally erroneous. Data on real estate pricing is readily available from many sources. Data from Applied Analysis indicates that the 2010 median Existing Home Price in Clark County, Nevada, was \$123,200, which represents an accurate devaluation of 60%-70%. The median home price in Searchlight is now \$60,000.

Page 3-100, Para 3.12.4 Economic Existing Conditions: Let’s talk about eco-tourism. Why is no mention made of the tourists (non-gaming) who recreate at Lake Mohave? Boaters, fishermen, kayakers, campers, hikers and other eco-tourists come to enjoy the quiet of the Joshua tree woodlands. These tourists eat in the restaurants, buy gas, and buy food at the convenience stores. This source of economic input will largely be lost forever if the turbine project is built. Searchlight is more than just a wide spot in the road between Nevada, Arizona, and California!

Recreation and Tourism Impact discussion added to document in Section 4.12-Socioeconomic Impacts.

Page 3-101, Para. 3.14.4.2 Area Income Levels: Again, data should be specific to Searchlight, and be at least as current as the 2010 Census. A quick drive around the region will verify that actual Searchlight income is more like that of Bullhead City, Arizona. Many residents are totally dependent on Social Security for their income. The report does note that the SIA has more people with incomes below \$50,000 than the two-county region. I’m sure the 2012 income base will be even lower than 2008, due to the decline of the economy in the entire nation, and particularly in Southern Nevada.

Data updated to 2010 Census.

Page 3-102, Income History Graph: This graph only extends to 2000. The report states that “Overall during this period (1970 to 2000) the relative level of prosperity in the region was improving.” That may have been true then, but between 2007 and 2012 the economic bubble burst, and the economics of the region today is far different. Many local economists feel the bottom still has not been reached. Nevada has the highest unemployment in the nation. Until tourism rebounds this will not change.

SIC code data series only extends to 2000. Comment noted.

If this project were built, it would create a few short-term jobs for out-of-town specialists, but in the long term would destroy the tourism in Searchlight. Therefore, the ROW should not be granted.

Page 3-106, Table 3.13-1, Estimated 2008 Families with Incomes Below National Poverty Level: Table should be redone using, at a minimum, 2010 Census data.

Data updated to 2010 Census.

Page 3-107, Para. 3.14.2.1 Potential Hazardous Materials and/or Waste: As noted in earlier comments, the potential for construction damaging the high pressure gas pipelines in the area is probably the most serious issue. Applicant needs to address, in detail, how the project would be redesigned to avoid the Southwest Gas Company easements and underground high pressure pipelines. Not only would damage to a gas pipeline do great damage to the area of Searchlight, but it would also cut off a much of the supply of natural gas to the Las Vegas Metropolitan Area.

Page 3-109, Para. 3.14.2.2 Fire Hazards: Placing 430 foot tall turbines in an area of frequent electrical storms should not be permitted. There should be serious concerns about turbine-caused wild fires. One only needs to visit the Altamont area of northern California to see the frequency of fires within a wind farm. The cause may be equipment failure, or the attraction of lighting to tall structures. Summertime storms in the area of Searchlight are accompanied by a great deal of lightning strikes.

Page 3-110, Paragraph 3.14.2.4 Transmission Lines and Pipelines: The paragraph makes no mention of the Southwest Gas Company's high pressure gas pipeline(s) that cross the full length of the project area. What safety provisions will be put in place to protect the workers and the residents?

SECTION 4.0 Environmental Consequences

Page 4-14, Para 4.3.1 Indicators: The DEIS states "The Proposed Action would affect water resources if it: Decreases groundwater supply . . ." There would be heavy water usage for construction and dust mitigation, but continued water use as the many miles of road will require ongoing maintenance and dust control. Water must be used to control dust on the areas stripped of vegetation for fire breaks? Once the natural vegetation is stripped, the area will become a prime area for infestation of non-native plants and noxious weeds.

Page 4-14, Paragraph 4.3.2.1. No Action Alternative: The BLM should arrive at the conclusion that to preserve the existing ecology of the area, as well as preserve the rights of the people who live in the area to have access to an adequate supply of potable water is the only possible action. This is the ONLY response that will allow the BLM to uphold its mandate from the citizens of the United States to "sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations."

Page 4-15, Groundwater Usage: The DEIS states that this usage would not impact groundwater recharge, but there is no indication that studies have been done on this specific area to confirm this assertion. Applicant should be required to have such a study performed to ensure that the water requirements for construction, O&M, and decommissioning will not deplete the Searchlight and Cal-Nev-Ari water supplies. Failing to independently confirm that the aquifer will renew/refill at a rate equal to, or above, the rate at which the project will use is very poor groundwater management. This certainly violates the BLM's mandate to protect the land!

Page 4-51, Section 4.7 Transportation Impacts, Para. 4.7.1, Indicators

The project would absolutely increase traffic, degrade the roads, prevent adequate emergency access, and cause loss of access to private land parcels. In addition, since each turbine has a safety set-back of 886 feet, access to recreation access points would be affected.

With 300,000 visitors annually to Cottonwood Cove, on a road that is narrow and steep, putting construction traffic into the mix is a recipe for disaster.

Southwest Gas Corporation holds a ROW grant from BLM for an existing gas line within the project area. The grant is non-exclusive; therefore, the BLM reserves the right to authorize other actions within a ROW area for compatible uses. The Applicant will be required to coordinate with Southwest Gas should there be any pipeline crossings, e.g., roads, underground electrical collection systems, etc. The result of the coordination would be a legally binding agreement that such crossings would meet Southwest Gas-provided standards for engineering and applicable material requirements to ensure the safe and continued operation of the gas line.

APM-7 provides for development and implementation of an Emergency Response Plan that would include fire suppression and control.

The firebreaks will need to be stabilized, either with water or some other approved method. Once stabilized, the firebreaks should no longer require watering, as no vehicle traffic is expected that would break the crust. Section 4.3.2.2-Proposed Action – 96 WTG Layout Alternative and Section 4.3.2.3-87 WTG Layout Alternative have been updated to include water usage estimates for construction of the wind facility.

The EIS specifies that alternative sources for construction water will need to be pursued in the event that SWS lacks the necessary capacity. The Applicant will coordinate with the Las Vegas Valley Water District to support the water needs for the project. If sufficient resources are not available, the Applicant will procure water from local willing sellers. Groundwater recharge in the project area is derived primarily from interbasin flow and precipitation percolating into permeable geological surfaces. An estimated 160 acres will be finished with impermeable materials; concrete and/or buildings. The estimated reduction of permeable surfaces across the 18,949 acres development would be less than 1%.

The setback is in conformance with BLM Instructional Memorandum 2009-043, which states that no turbine on public land will be positioned closer than 1.5 times the total height of the wind turbine (approximately 640 feet) to the right-of-way boundary. No turbines are located within the setback from any building or primary road, other than the spur road to each turbine used for construction and maintenance, or two-track and casual-use roads.

During the construction period those people who use Oregon Trail Road would encounter great difficulty just coming and going from their properties.

Page 4-52, Lines 13 and 14, state "When construction is completed, access for motorized travel might increase due to the construction of 29 miles of new roads."

With each turbine having an 886 foot safety set-back due to potential for blade throw, just where will the public be allowed to drive? The roads are closer than 886 feet to each turbine.

Page 4-52, Lines 15 and 16: "Given the number of vehicle trips during the construction period, along with the movement of heavy construction equipment, it is reasonable to anticipate that the Proposed Action might damage public roads through increased use." The word "might" should be changed to "will". There is no doubt that the volume of heavy construction equipment will cause severe damage to existing roadways.

Page 4-52, Lines 21 and 22: "Construction of the Proposed Action would have a beneficial effect on road conditions because it would result in restoration of a county road to its preconstruction conditions for both the base and the surface."

The "preconstruction condition" is not optimum. Saying that taking the road back to preconstruction condition is like saying it would be beneficial to have your ten-year old car totaled, then getting it back after 8 to 12 months in the body shop, complete with the same dings it had before it was wrecked and repaired!

Page 4-52, Line 36: "Overweight and oversized loads could cause short-term disruptions to local traffic." Oversized loads on Cottonwood Cove Road will shut down all other traffic. The road is 24 feet wide, and is the only route to Cottonwood Cove on Lake Mohave.

Page 4-53, Lines 10, 11 and 12: "Future roadway improvements in and around Searchlight could reduce potential traffic delays, improve traffic flow, and increase access for motorized travel." What roads and what improvements is the applicant committing to make?

Page 4-56, Land Ownership: "the 5.5% of the project area that includes privately owned parcels would not be affected by the construction, O&M, or decommissioning of the Proposed Project, as it has been sited to specifically avoid privately owned parcels." This is blatantly untrue – EVERYONE who owns land in this area will be negatively affected. Studies have proven that values of private property land within sight of wind turbines are immediately devalued by at least 50 percent. For the DEIS to state that these parcels would not be affected is an insulting and uneducated conclusion.

Is the applicant or the BLM so certain that the property values will not be negatively impacted that they are willing purchase all private property, both residential and open land, within three miles of the project area? I thought not.

Page 4-79, Para. 4.10 Noise:

The DEIS spends untold pages discussing the methodology, etc. The fact is that most people who will be affected could tolerate the construction noise for the 8 to 12 month period. This is assuming the construction will not occur 24 hours per day for 365 days. What is totally unacceptable is having to live with the noise from wind turbines for fifty years. The turbine sound is un-ending and is in fact 24 hours per day, 365 days per year. Residents living near wind farms have reported heart disease, tinnitus,

Refer to MM-TRAN-1-Traffic Management Plan for a discussion of traffic plan elements that would be included to address effects on local traffic. The Traffic Management Plan would be a stipulation of the ROW Grant.

Each turbine has a setback recommended by the manufacturer, which ranges from 866 to 1,050 feet as it is a function of rotor diameter. No turbines are located within the setback from any building or road, other than the spur road to each turbine used for construction and maintenance. The setback is in conformance with BLM Instructional Memorandum 2009-043, which states that no turbine on public land will be positioned closer than 1.5 times the total height of the wind turbine (approximately 640 feet) to the right-of-way boundary.

Text in Section 4.7-Transportation Impacts, modified to the following:

Given the number of vehicle trips of heavy construction equipment during the construction period, it is reasonable to anticipate that the Proposed Action will damage public roads. Only minor vehicle use is anticipated during O&M and decommissioning. The Proposed Project site is in a relatively undeveloped area, and it is anticipated that construction traffic would result in short-term effects on access or road conditions.

Construction of the Proposed Action would have a temporary adverse effect on road conditions because any damage would be followed by restoration of a county road to its preconstruction conditions for both the base and surface.

Refer to Section 4.12-Socioeconomic Impacts, which has been updated indicates there would be no effect on property values. For further information see the newly added Appendix F: Literature Review of Socioeconomic Effects of Wind Project and Transmission Lines.

See Section 4.10.2-Direct and Indirect Effects by Alternative for discussion on noise impacts. MM-NOI-1 states that construction activities would only occur during daytime hours.

vertigo, panic attacks, migraines, and sleep deprivation. To sentence Searchlight residents to that for fifty years is incomprehensible.

Page 4-81, Line 21: The 1,400 feet setback from a wind turbine from private property is entirely inadequate in the desert. Clark County and BLM should develop standards for desert wind projects, which would require a minimum setback of three miles from private property.

Page 4-92, Line 18: DEIS states "Blasting might be necessary in order to construct access roads and set turbines." Change "might" to "will". Blasting will be necessary in much of the project area due to the hardness of the granitic bedrock.

Page 4-84, Table 4.10-2 Operation Noise Model Parameters. The source of the Wind Table data is from Duke Energy. It would be far more believable if the data was from an independent source. As stated earlier in these comments, this claim is not credible.

Page 4-85, Table 4.10-3 Predicted Operation Noise. Why does this table omit Parcel 24324000011? This parcel has people living on it full time. They will be far more impacted than the undeveloped properties that are listed. Was this parcel left off intentionally? Also, Parcel 24324000012 was omitted. It, too, lies very close to the nearest turbines, but at present is undeveloped. This table should be redone, and sound data for these two parcels included, as well as other nearby parcels which were not omitted.

Page 4-91, Para. 4.10.4 Residual Effects. What are the "applicable APMs and MMS"? Would this include turning off turbines at night, or if this is not successful in giving the landowners relief, buying out the property of the people who are affected?

Page 4-92, Para. 4-11 Recreation Impacts

Page 4-92, Para. 4-11.1 Indicators: All four items listed will occur if the project is built. Conflict already exists between the master plan for Searchlight Trails, and the planned WTG's. Also, noise levels will be in conflict with NPS levels for noise at night. Access to existing recreation will be altered by the presence of wind turbines along Cottonwood Cove Road, and ORV riding areas will be impacted by the presence of turbines in previously accessible areas. The levels of use at Cottonwood Cove will change. Many people will no longer find it desirable to travel to a site with the higher noise levels that will result from the turbines.

Page 4-93, Compliance with Management Goals: The DEIS states that there would be no change to the status of the ERMA or existing ROS classification. The eighty-seven 430-foot tall wind turbines will have a hugely negative effect on recreational opportunities. What would it take to constitute a change?

Page 4-93, Lines 11, 12, 13: Could this paragraph be translated into plain English? When 12 months of construction, 37 miles of new road, and 87 430 foot turbines in a natural area is considered fine for recreation areas on public lands, there needs to be some interpretation done.. The same question again. Given the 886 foot set-back zone for safety reason, how will the public access the roads? The altered environment and noise from turbines will eliminate the area for hunting. The change in the viewshed and noise level will not be acceptable for hikers looking for a natural experience.

Page 4-94, Lines 11 – 13: The Old Spanish National Historical Trail. "Construction activities would have minimal but permanent impacts on the trail." The BLM must come up with another plan that doesn't deface the environment and negatively impact the historical heritage in Nevada. Our history is NOT expendable!

The setback is in conformance with BLM Instructional Memorandum 2009-043, which states that no turbine on public land will be positioned closer than 1.5 times the total height of the wind turbine (approximately 640 feet) to the right-of-way boundary.

It is not certain that blasting will be necessary because on the ground geotechnical studies have not yet been conducted.

The data in Table 4.10-2. Operation Noise Model Parameters were provided by a wind turbine vendor, and represent the sound power level of the turbine as measured according to IEC 61400-11:2002. This standard was specifically developed to quantify noise output from wind turbines.

The noise modeling analysis included residential properties that were nearest to any wind turbine locations. Parcel 24324000010, which was included in the analysis, is closer to a wind turbine than parcel 24324000011. Similarly, Parcel 24324000021, which was included in the analysis, is closer to a wind turbine than parcel 24324000012.

See noise modeling in Section 4.10-Noise Impacts, for discussion on the conservative projected noise levels in the area. It is not anticipated that noise would exceed Clark County Noise Standards at residences; therefore, no mitigation is required.

BLM right-of-ways are managed for multiple uses. Section 4.10-Noise Impacts, indicates that sound levels for the NPS would be under 35 decibels which is in conformance with the NPS requested level. No wind turbines are directly adjacent to Cottonwood Cove Road. WTGs would be visible from the road. Access roads would be improved, providing access for OHV riding. Cottonwood Cove is 7.5 miles from the nearest WTGs and the noise level would not change from current levels.

The Recreation Opportunity Spectrum (ROS) classification gives the BLM direction in how to manage for recreation use. Each ROS Class is defined in terms of "activity opportunities," "recreation setting conditions," and "experience opportunities." The Searchlight area is classified as "roaded natural". Although there would be a change in the recreation setting experience, there would be no change to the activity opportunities and a change to only a portion of the experience opportunities. If the change would have also increased recreation use to cause the need for additional recreation facilities development, it may have caused the classification to change.

Each turbine has a setback recommended by the manufacturer and could range from 866 to 1,050 feet as it is a function of rotor diameter. No turbines are located within the setback from any building or primary road, other than the spur road to each turbine used for construction and maintenance. This is a standard design safety precaution to protect established structures and major thoroughfares. This does not prevent the use of the road. OHV users and other recreationalists can drive on the maintenance roads or existing two-track roads in the area.

Text has been included in the FEIS to indicate that existing access roads and/or highways cross the Congressional route of the Mojave Road Variant of the Old Spanish Trail. In November of 2012 the BLM consulted with the NPS National Trails Intermountain Region office representative and they concurred with the BLM that there would be no conflict between this route and the project either directly or visually due to this Congressional route already having been adversely impacted from historic and modern improvements along the corridor in the Searchlight Wind Energy Project vicinity. No mitigation is recommended for this project

Page 4-94, Lines 31 through 40. It is an understatement to say the project “could” have long-term impacts on the recreation setting and experience. The Searchlight wind farm WILL change the impacted area from pristine desert to a heavy industrial zone. The document states the project would “degrade the quality of the recreation setting.” This area is an important area for Bighorn Sheep, and the document states the project could have a negative effect on big game and upland game and wildlife habitat. Given the admitted degradation of the natural area, and negative effect on every aspect of the area, the BLM cannot consider any alternative other than the “No action” alternative and still uphold its obligation to provide environmental stewardship to our public lands.

Page 4-95, Lines 4 through 8. It is stated that the project “. . . would not substantially impact the area’s potential for recreation opportunities . . .” This statement is not believable. Even though the so-called “footprint” is minimal, the fact that the turbines and infrastructure are dispersed over thirty square miles belies that statement.

Page 4-95, Para. 4.11.4, Residual Effects: How can a 30-square mile project be deemed having “moderate residual impacts on the recreation setting and experience resulting from the long-term presence of WTG’s transmission lines, and access roads.” How can the presence of 430 foot tall turbines, generating loud noises, and destroying the viewshed, be considered “moderate”?

Page 4-96, Para. 4.12 Socioeconomic Impacts

Page 4-96, Para. 4.12.1 Indicators: The temporary increase in construction workers is guaranteed to result in increased crime and auto accidents. Clark County and Searchlight infrastructure, including police, firemen and paramedics, are not prepared to handle these issues in a remote area. Define “Result in a tax burden to local residents not offset by the Proposed Action’s generation of new public revenue.” Searchlight is not incorporated, and taxes are set by the state and county

The people of Searchlight will suffer. Searchlight’s economy for years has been dependent on tourism. This project will effectively destroy tourism at Cottonwood Cove for one to two years. Since Searchlight does not have adequate resources to feed and house the construction workers during that period, it is incorrect to assume that revenue will replace the tourism dollars. The increased spending resulting from the project will occur in Las Vegas, Laughlin, Bullhead City, and even more distant sources of supply. Land Lease payments made to BLM go to the U.S. Treasury; sales tax goes to the state; property taxes go to the county and state. Searchlight will be left worse off economically and “social benefit-wise” than before the project.

The one group that will directly benefit from the project is the shareholders of Duke Energy. CEO James Rogers has been quoted as saying, when asked why Duke invested in wind projects, that wind projects guarantee Duke Energy from 17 to 22 percent return on equity. This is particularly obscene, when one considers the damage to the people of Searchlight and the desert environment surrounding the town.

Also, the location of the project surrounding the town on three sides will prevent future growth for Searchlight. The project is a “lose-lose” for the Searchlight and its residents.

Page 4-98, lines 13 to 25: The statement “The land would retain its rural desert qualities, and the habitats supporting ecosystems and species would not be altered from project-related encroachments.” is true, under the “No Action” alternative. In addition, the residents of Searchlight and the surrounding area could continue to enjoy their rural lifestyle; tourists could continue to find enjoyment in the natural environment surrounding Lake Mohave, Native Americans could continue to visit sacred Spirit Mountain

Recreationists will still be able to participate in their traditional activities; however, the type of experience will change.

Section 4.11.4-Residual Effects has been updated to state that residual impacts would be substantial instead of moderate.

Refer to Section 4.12-Socioeconomic Impacts under Fiscal Impacts.

Tax revenue stream to Clark County judged sufficient to cover increase in incident responses due to project construction and operation. Section 4.12-Socioeconomic Impacts has been updated to include Impacts on Property Values.

The analysis compares socio-economic conditions with and without the project.

without the beauty of the nearby desert having been destroyed; Searchlight residents could continue to enjoy the beautiful views of Spirit Mountain and Lake Mohave, and enjoy stargazing under the dark, quiet night skies. Eagles, bats, tortoises, desert bighorn and other wildlife could continue to survive in their natural habitat.

Only the No Action alternative would have very positive socioeconomic impacts in the immediate areas of Searchlight, Cal-Nev-Ari and Cottonwood Cove. There would also be no need to count dead eagles and other dead birds, dead bats, and dead tortoises under the No Action alternatives. Tourism would flourish.

Page 4-112, Line 32: The report notes that Cottonwood Cove Road passes by some of the newer homes in Searchlight. Please note: Very few of these homes were ever sold. The developer went bankrupt, and the empty homes are now bank-owned. I am the listing agent for the Cottonwood Lakes Homes, and I can assure you that these properties are already priced at approximately one-third of the original asking prices. The possibility of the homes being in the proximity of a wind farm has contributed to the low asking prices. Realtors are obligated to inform potential buyers of the plan for an industrial wind farm nearby.

Page 4-112, Line 34-35: The statement that “no negative impacts on property values from construction and O&M of the 87 WTG Layout Alternative could be documented.” This statement is incorrect.

Page 4-119, Fire and Electrocutation Hazards: The DEIS mentions overhead transmission power lines, but does not mention the underground hazard presented by the existing high pressure gas pipeline.

Page 4-120, Lines 4-14: This paragraph describes the propensity for WTG’s to cause fires. As discussed earlier, the local volunteer fire department may not be able to respond with enough fire-fighting capability to handle wind turbine caused fires, and other fire-fighting agencies are at least 40 miles distant. This would create a very hazardous situation for the residents of Searchlight.

Page 4-120, Lines 23 – 26: The creation of the fire breaks mentioned would result in clearance of a large amount of desert flora. This would contribute to very dusty conditions throughout the entire project area. How would applicant prevent dust from blowing following clearing of all vegetation? Will this require even more water than originally stated?

Page 4-125, Para. 4.15.9 Visual Resources: If the life of the project is 50-70 years, the visual resources are essentially gone for a lifetime. To say that there is not anticipated to be any irretrievable commitments of recreational resources is misleading. The resource is lost for at least two generations.

Section 4.12-Socioeconomic Impacts has been updated to include Impacts on Property Values. For additional discussion, refer to the newly added Appendix F: Literature Review of Socioeconomic Effects of Wind Project and Transmission Lines.

Southwest Gas Corporation holds a ROW grant from BLM for an existing gas line within the project area. The grant is non-exclusive; therefore, the BLM reserves the right to authorize other actions within a ROW area for compatible uses. The Applicant will be required to coordinate with Southwest Gas should there be any pipeline crossings, e.g., roads, underground electrical collection systems, etc. The result of the coordination would be a legally binding agreement that such crossings would meet Southwest Gas-provided standards for engineering and applicable material requirements to ensure the safe and continued operation of the gas line.

Refer to Section 4.14-Health and Human Safety Impacts for a description of the 20-foot-wide firebreak on the exterior of the perimeter fencing surrounding the O&M building and the proposed substations, and WTG locations (APM-7). APM-7 provides for development and implementation of an Emergency Response Plan that would include fire suppression and control. The firebreak acreage was included in the Air Quality analysis and a Dust Control Permit is required from the DAQ prior to start of construction projects in Clark County. The permit will contain measures to reduce fugitive dust.

Comment noted.

April 17, 2012

BLM, Las Vegas Field Office
Attn: Greg Helseth, Renewable Energy Project Manager
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BLM_NV_SND0_SearchlightWindEnergyEIS@blm.gov

COMMENTS ON SEARCHLIGHT WIND ENERGY RIGHT-OF-WAY APPLICATION

Dear Mr. Helseth:

As a concerned citizen and resident of Southern Nevada, I am respectfully requesting that the Bureau of Land Management DENY the right-of-way application submitted by the Searchlight Wind Energy Project (NVN-084626).

After reviewing the DEIS for this project, I am convinced that approving the application would violate both commonsense and the BLM's obligation to the citizens of the United States to "sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations." The wind farm project will be nothing short of a death sentence, both economically and biologically, for the Mohave Desert and the town of Searchlight.

Based on the information in the DEIS, the only conclusion the BLM should reach for this project is an outright denial of the ROW application!

1. **Data Used:** Nearly all of the statistics used in the DEIS are outdated and/or obsolete. Current (2010) census data, as well as recent socioeconomic trends in population and real estate prices, are readily available and should be used. The outdated data does not provide an accurate picture of the local population and economy, which has been more drastically-affected by the recession than other areas of the United States. This can, and in my opinion HAS, led the BLM to draw erroneous conclusions in the DEIS. The use of faulty data to reach a conclusion that could negatively impact an entire community, as well as numerous wilderness areas, is unacceptable.
2. **Missing Data:** Several parcels of privately-owned land which will be directly impacted by the proximity of the WTGs were not included in the DEIS evaluation. These properties, off Oregon Trail Road, are the closest to the proposed WTG sites. At least one property line is INSIDE the required 886-foot "blade throw safety setback"! Failure to include these parcels in consideration is both deceptive and inexcusable!
3. **Oversight:** Several items in the DEIS require the applicant to commission and provide reports or supervision for environmentally-sensitive mandates and agreements, such as cultural resources and desert tortoise protection. There is no mention of any oversight to ensure compliance by the applicant. This oversight should NOT be provided by the applicant, so who WILL provide it and from where will the funds and manpower be obtained?
4. **Water:** "Water for the Proposed Project would be obtained from the existing 15 SWS, which is supplied by two supply wells, or another existing water right in the Searchlight area." What studies have been done to confirm the recharge rate for the local water table? Southern Nevada is in the middle of a drought, and 2012 is predicted to be the worst year yet. Where is the water coming from? Will the residents and business owners in Searchlight suffer because the construction needs outweigh the water available?

Comment noted.

4.12-Socioeconomic Impacts have been updated using 2010 Census data.

All private property information was obtained from the BLM and confirmed with the Clark County Assessor's office. All properties on Oregon Trail Road were included in the EIS. No turbines are located within the setback from any building or road, other than the spur road to each turbine used for construction and maintenance.

A third party compliance contractor will be a stipulation of the ROW grant. Third party compliance contractors are funded by the applicant but must be approved by the BLM.

The Nevada Division of Water Resources monitors water use. Water law in Nevada is based on protecting prior appropriations. Piute Valley is a designated basin. Therefore, no additional water rights can be issued. If the SWS system cannot meet the water demand for this project, then alternative sources will be sought. The Applicant will coordinate with the Las Vegas Valley Water District to support the water needs for the project. If sufficient resources are not available, the Applicant will procure water from local willing sellers

5. **On-Site Construction:** Why are the turbine towers being constructed on-site? In New Zealand, turbine towers are constructed off-site and then lifted into place via helicopter. This minimizes the environmental impact, since only a standard-width access road is required. Why is there no mention in the DEIS of other construction methods (such as the helios) that could enormously reduce the damage to our desert? Is this a case of "but we've ALWAYS done it this way" over an environmentally-sound alternative?
6. **Relocation of Plants and Cacti:** Despite what the *Searchlight Botanical Survey Report* (AEC 2010), which was prepared for Duke Energy, claims, Joshua Trees DO grow in the impacted area. These endangered plants are NOT suitable for transplanting, as they are very delicate. Given that 90% of the desert plants along US-95 died after being "re-vegetated", the very idea that anyone could temporarily move and/or store delicate Joshua Trees (or any other desert plants), and then replant them is ludicrous.
7. **Use of US-95 for Transporting Turbine Parts and Equipment:** US-95 between Las Vegas and Laughlin, NV is, at best, a nightmare to drive. There are already thousands of vehicles per day using this road, including hundreds of 18-wheelers and RVs. Adding the number of oversized construction vehicles required to deliver turbine sections and other necessary equipment to the project site will overload the highway and create even more traffic nightmares than already exist.
8. **Effect on Cottonwood Cove Drive:** Cottonwood Cove Drive is a single-lane-each-way road, primarily used by residents and visitors to the Colorado River. The amount of construction traffic, and the size of the vehicles needed, will overload the existing road. It will create traffic obstructions that will prevent easy access to both the residential areas and the river. Widening the road by 50% (to 36 feet) will destroy both the desert habitat and the very nature of the entryway to the Colorado River.
9. **Socioeconomics:** The DEIS claims the project will provide "short-term, beneficial residual effects on population and housing..." There will be no beneficial effects, short-term or otherwise, for the town of Searchlight. Any workers hired for the project will either be "locals" who already have housing in Las Vegas, or will be brought in from out-of-town and therefore be housed in Las Vegas, as Searchlight has limited visitor lodging available. This does nothing at all for the economy of the town that will be most affected by the construction. The same applies to the "long-term beneficial residual effects" of the wind farm. There are NO beneficial effects for Searchlight!
10. **Local Opinion:** Although the BLM's obligation to the taxpayers does not require it to make decisions based on popularity with local residents, when nearly everyone who will be **directly affected** by a given decision is OPPOSED, it would be unreasonable of the BLM to ignore their opinions. In this case, the vast majority of Searchlight residents and landowners are opposed to the wind farm project, which will surround their town on three sides, devastate their already-depressed property values, and potentially destroy their livelihoods and dreams of retirement.
11. **Cultural Resources:** The applicant is charged with preparing, on the BLM's behalf, an "inventory of cultural resources within the APE...to determine which are historic properties..." and to determine the project's potential effects on these resources. There is no mention of independent oversight to ensure an honest and accurate report is generated by the applicant.
12. **Clean Water Act:** The applicant is charged with preparing a report identifying wetlands. Again, there is no mention of independent confirmation of the report's results. This is akin to allowing the fox to guard the henhouse!

Construction using helicopters would still require road construction or improvements for construction of foundation excavation and other construction activities. Helicopter use for heavy construction raises safety concerns, and noise impacts.

The commenter is correct that Joshua trees and other desert fauna is difficult to transplant. A detailed cactus and yucca salvage plan is being developed for the project and elements of that plan are discussed in MM-BIO-2-Cacti and Yucca Salvage Plan. If the project is approved, the salvage plan will be included as a stipulation in the ROW grant.

Comment noted.

A Traffic Management Plan would be prepared to address effects on local traffic. Refer to MM-TRAN-1 for a discussion of elements that would be included in that plan. The Traffic Management Plan would be a stipulation of the ROW Grant. It is not proposed that Cottonwood Cove Road would be widened to 36 feet (see Figure 2-2-87 WTG Layout Alternative).

Comment noted.

Comment noted.

The inventory was conducted by professional archaeologists and architectural historians employed by an independent contractor (URS Corp.). The contractor is required to provide unbiased recommendations for cultural resources in the project area. BLM archeologists, familiar with the project area, reviewed the cultural resources report and provide constructive comments to the contractor. The federal government, not the independent contractor, makes the final determinations on the eligibility of sites in consultation with the State Historic Preservation Office.

The wetlands report (Jurisdictional Determination) and permitting is subject to regulatory review of the US Army Corps of Engineers.

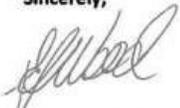
13. **Lack of Need:** The applicant does not have a purchase agreement, a letter-of-intent, or even a "gentlemen's agreement" from any utility to buy the power it proposes to generate. This is a classic case of "if you build it, they might come" mentality! The applicant proposes to spend billions of dollars, including taxpayer funds for the BLM's role in this project, to generate electricity no one plans to buy. The original proposal included sending the power to California (NOT to Nevada, so no benefits to us there, either). However, California recently announced it will no longer need to purchase renewable energy from outside the state and will, in fact, be SELLING power it generates!
14. **Areas of Critical Environmental Concern (ACEC):** The DEIS specifically states that there are ACECs "adjacent to and surround[ing] the project area". Because the designated project area does not include these lands, no evaluation was made of any direct impacts. However, the DEIS further states that during the construction phase, "Some [wildlife] species that are particularly mobile might be able to avoid injury or mortality by leaving the area." The report also states: "... noise and activity associated with construction could cause animals to avoid the area, thus altering their normal behavior patterns." Given that the ACECs are ADJACENT to the impacted area, where do you think those "mobile" species will be going? The DEIS claims APMs 1-4 and APM-9 will "mitigate" any problems for the ACECs, but none of those APMs cover the possible addition of wildlife populations to areas of CRITICAL ENVIRONMENTAL CONCERN!!

"Residual effects on wildlife diversity, populations, and habitat resulting from implementation of the Proposed Action or alternatives would be long-term. Effects include the permanent loss of 152-160 acres of wildlife habitat, resulting in the loss of shelter, breeding and foraging opportunities in the project area, and barriers and hazardous to wildlife behavior patterns with construction of new roads and transmission line towers." Again... loss of habitat = relocation of plants and animals, which WILL have a DIRECT impact on the ACECs! It is the obligation of the BLM to "sustain the health, diversity, and productivity of America's public lands..." To uphold this mandate, a complete study of the potential impact of these "mobile" species on the ACEC is required.

Six wilderness areas near the proposed project site have also been deemed by the BLM to be worth preserving, in addition to the ACECs. Why would this agency consider destroying the area immediately adjacent to Searchlight? The turbines will be visible from several of the six wilderness areas, as well as the Mojave Desert Preserve in California. How can these still be considered wilderness areas if they are in proximity to heavy industrial development?

It is my heartfelt wish that the BLM deny this ROW application. The devastation this project will cause to the residents of Searchlight, combined with the long-term destruction of a large section of the Mohave Desert, is simply unacceptable. This is the MOHAVE DESERT, not the Gobi. It is not a barren wasteland avoided by all living things. It is a vibrant, living eco-system. Allowing this to be ruined for next 70 years directly violates the BLM's mandate to protect our public lands both now and for the future.

Sincerely,



Eileen F Wood
6009 Chariot Lane
Las Vegas, NV 89110

Comment noted.

Possible impacts to wildlife are limited to the project area because that is the area in which impacts would occur. An ACEC is deemed an avoidance area except within a half-mile of a federal-aid highway. The proposed project would not have any habitat removal or operational impacts within the ACEC except for the proposed switching station and transmission line, which in which this exception would be applicable. Development of the proposed project (i.e. land outside the ACEC) is in conformance with BLM land use policy as discussed in Section 4.8-Land Use Impacts.

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