

Private Citizen/Individual's Written Comments

April 17, 2012

BLM, Las Vegas Field Office
Attn: Greg Helseth, Renewable Energy Project Manager
4701 N. Torrey Pines Drive
Las Vegas, NV 89130
ghelseth@blm.gov
BLM_NV_SNDO_SearchlightWindEnergyEIS@blm.gov

Dear Mr. Helseth:

I would like to submit these comments for the Draft Environmental Impact Statement (DEIS) for the Searchlight Wind Energy Project (NVN-084626) and request that the BLM deny the right-of-way application submitted by the Searchlight Wind Energy Project (NVN-084626).

I am opposed to the project for the following reasons:

1. Nearly all of the statistics used in the DEIS are outdated and/or obsolete.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 The outdated data does not provide an accurate picture of the local population and economy, which has been more drastically-affected by the recession than other areas of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.
2. The Purpose and Need Statement should incorporate a "need" to protect wildlife, visual resources, cultural resources, property values and public health.
3. The DEIS failed to consider a full range of alternatives. The National Environmental Policy Act requires the Bureau of Land Management to examine alternatives outside of the jurisdiction of the lead agency.
4. The BLM needs to consider a distributed generation alternative, a private lands alternative and an alternative that sites the project away from sensitive wildlife resources and private property.
5. The BLM needs to include an alternative that designates No Action and declares the site inappropriate for wind energy.
6. The DEIS states that the Las Vegas Resource Management Plan will not need to be amended to approve this project because the site was examined by the Wind Energy Programmatic Environmental Impact Statement in 2006, but the Wind PEIS contains very little specific information on the Searchlight Wind Project site. The Las Vegas Resource Management Plan is a very big land use plan and will need to be amended to examine the impacts of the project.
7. In some cases, the project would be located within a quarter mile of private property. Several privately-owned parcels, those closest to proposed WTG sites, were not included in the noise data review. The DEIS does a poor job of evaluating public health impacts such as Wind Turbine Syndrome and effects from dust stirred up during construction.

Data has been updated to 2010 Census.

The EIS's purpose and need statement complies with NEPA, applicable regulations, and BLM policies and procedures, including BLM Instructional Memorandum 2011-059. The purpose and need statement appropriately integrates Congress's goal that the Secretary of the Interior should seek to approve renewable energy projects on the public lands; direction from Secretarial Order 3285A1 (March 11, 2009, amended February 22, 2010), which establishes the development of environmentally responsible renewable energy as a priority for the Department of the Interior; and the BLM's responsibility under FLPMA to manage the public lands for multiple use, taking into account the long-term needs of future generations for renewable and non-renewable resources.

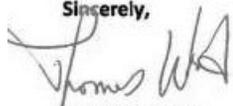
The BLM developed a purpose and need statement and considered a range of reasonable alternatives consistent with NEPA, applicable regulations, and BLM policies and procedures, including BLM Instructional Memorandum 2011-059. The two action alternatives satisfy the purpose and need because they fulfill BLM's obligation to consider the ROW applications under FLPMA and NEPA and because they are consistent with other applicable federal mandates and renewable energy policies and goals.

Section 1.5-Land Use Plan Conformance Determination and Section 4.8-Land Use Impacts discloses that the project is consistent with the BLM RMP. This EIS is evaluates the site-specific impacts to resources as directed by the PEIS.

8. The project would further damage the already depressed property values of local residents and landowners.
9. The project would be located in very close proximity to Lake Mead National Recreation Area and the Colorado River which has a unique and important avian fauna. It is a fly-way for migratory birds. The numbers from the Altamont Pass wind farms in California prove that wind energy injures and kills avian fauna. The nearest turbines would be just 8 miles from the Colorado River.
10. Lake Mead is an essential area for wintering bald eagles, and golden eagle nests have been found within 5 miles of the project. Golden eagles are being killed by wind turbines all over North America.
11. Surveys for the project have stated that the desert tortoise population numbers are about 13 adults per square mile which is significant. The project will fragment the habitat with large wind turbine footprints and about 30 new miles of roads, many of which will be 36 feet wide. Mitigation proposals are not sufficient to prevent impacts to the species.
12. The project would block linkage and movement corridors for desert bighorn sheep.
13. Most of the biological resource mitigation for the project is deferred and there is little information on how the applicant will mitigate impacts to bats, burrowing owls, Gila monsters, rare plants, etc.
14. The DEIS has not evaluated all of the cultural resources located on the site.
15. The project will have negative impacts on the visual resources in the area. It will be visible from Lake Mead National Recreation Area, the Mojave National Preserves and wilderness areas adjacent to the site. The project will also have red flashing aviation lights activated for the entire night. The project will be a visual disturbance to the local residents of the area which could impact the tourism economy.

I would like to request that BLM adopt a No Action Alternative for this project and to designate the area inappropriate for wind energy.

Sincerely,



Thomas Wood
6009 Chariot Lane
Las Vegas, NV 89110-2707

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.

The updated Socio analysis presented in Section 4.12-Socioeconomic Impacts indicates there would be no effect on property values.

Comment noted. Impacts to golden eagles are discussed in Section 4.4.5.11-Migratory Birds - Direct and Indirect Effects by Alternative and Appendix B-4: Bird and Bat Conservation Strategy, which has been added to the EIS.

The USFWS determines appropriate mitigation measures in the Biological Opinion, which is included as Appendix B-2: USFWS Biological Opinion.

Impacts to desert bighorn sheep are discussed in Section 4.4.5.14-Game - Direct and Indirect Effects by Alternative. Also refer to Appendix B-3: Terrestrial Wildlife Plan, which has been added to the EIS. The project would only occupy a small portion of the available migratory corridor between these mountain ranges leaving some connectivity between the ranges; therefore, the project effects are anticipated to be minimal.

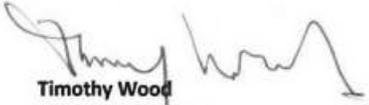
A Bird and Bat Conservation Strategy (BBCS) was developed for the project, which follows the guidelines of the recently published USFWS Land-Based Wind Guidelines (Appendix B-4: Bird and Bat Conservation Strategy).

Burring owl mitigation is discussed under MM-BIO-6. Mitigation for Gila monsters is discussed under MM-BIO-4 and in Appendix B-3: Terrestrial Wildlife Plan. No rare plants were found in the survey area; therefore, no mitigation is required.

An intensive cultural resources inventory of the Area of Potential Effect (APE) (i.e. activity areas surrounded by a large buffer) was performed. No disturbance activities would occur outside of the 200-foot buffer area. Cultural resources outside of the APE would not be impacted. Any modifications or changes to the APE would trigger additional cultural resource inventories. All sites identified during the Class III inventory have been evaluated for eligibility to the National Register of Historic Places.

Comment noted.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Wood". The signature is fluid and cursive, with a prominent loop at the end.

Timothy Wood
6009 Chariot Lane
Las Vegas, NV 89110-2707



SEARCHLIGHT WIND ENERGY PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Public Meeting Comment Form

Bureau of Land Management, Las Vegas Field Office, NV

The Bureau of Land Management (BLM) is holding public meetings to encourage public comments on the Draft Environmental Impact Statement for the proposed Searchlight Wind Energy Project. Comments received during the Draft Environmental Impact Statement (EIS) comment period will be addressed in the Final EIS. Written comments on the Draft EIS must be received via email or postmarked no later than April 18, 2012. For further information, please contact Gregory Helseth at (702) 515-5173 or send an email to: blm_nv_snd_searchlightwindenergyEIS@blm.gov.

Please provide your current mailing address and/or any additional names and addresses you think should be included on our mailing.

Meeting Location: Douglas City
 Your Name: Thornton Michael Name: _____
 Address: 330 E Warm Springs Rd Address: _____
 City/State/Zip: LV, NV 89119 City/State/Zip: _____

Please check all that apply:

- Add my name to the mailing list for this project
- Do not include my name on the mailing list
- Withhold my name/address to the extent allowed by law (only for persons not representing an organization)*

* All comments received by the BLM become a part of the public record associated with this proposed project. Accordingly, your comments (including name and address) will be available for review by any person that wishes to review the record. At your request, we will withhold your name and address to the extent allowed by the Freedom of Information Act or any other law.

Comment:

Being recently settled in Las Vegas.
These turbines ~~are~~ will impact on environment
eg: flora, fauna, ruin amenity values.
I previously was a citizen in a country where
green technologies are required by law. on this basis.
current proposal is short sighted, ill considered & poorly
located. Any jobs created will be short term.
I suggest both parties get onboard an aircraft bound
for New Zealand & discover the "correct" way to
install environmentally friendly energy sources.

Comment noted.

April 18, 2012

To: BLM, Las Vegas Field Office
Attn: Greg Helseth, Renewable Energy Project Manager
4701 N. Torrey Pines Drive
Las Vegas, NV 89130
ghelseth@blm.gov
BLM_NV_SNDO_SearchlightWindEnergyEIS@blm.gov

From: Zachary Stanko, E.I.T., Humboldt State University
656 16th St
Arcata, CA 95521
zps2@humboldt.edu

Subject: Comments on Searchlight Wind Energy Project Draft EIS

Summary

The main points addressed in this memo cover four topics: NEPA procedures, water resources, aesthetics, and economics. The focus of this critique is on the wind turbine generators (WTGs) that are proposed to be constructed (i.e., not the switching station). Overall, some deficiencies in impact mitigation, value estimates, and graphic representation are identified. There are also some organization and clarity issues that could confuse the reader. My Intent in disclosing these deficiencies is to see the project is described fairly and accurately.

Introduction

I am writing this memo as a research engineer at the Schatz Energy Research Center in Arcata, CA, and with a general interest in wind power projects. I am in favor of this project and wish to address some points that may have been overlooked and could lead to misunderstandings. My area of professional expertise is hydrology and water resources and my position as a citizen is one of a frequent visitor to national parks and recreation areas. The Searchlight Wind Energy Project (the Project), as I understand it, is an application by Searchlight Wind Energy to construct, operate, maintain, and eventually decommission a 200+ MW wind turbine generator (WTG) facility adjacent to the town of Searchlight, NV.

Procedural Comments

The purpose and need for the BLM is to respond to the right-of-way applications by Searchlight Wind Energy. If granting or not granting permits is the sole reason for the BLM conducting this analysis, then either no action (deny the permit) or action (granting the permit) with or without modifications would be the result. However, there is no clear method or criteria for choosing

A table summarizing impacts has been added to the Executive Summary.

April 18, 2012

between the proposed action (96 WTGs) and the BLM preferred alternative (87 WTGs). Some method for the reader to determine the tradeoffs associated with a difference of 20 MW between alternatives. If the difference is only a disturbance of 20 temporary acres and 8 permanent acres, then it seems that the extra power over a proposed 30-year lifespan would be preferred. While I recognize there are additional, substantial differences to the two alternatives, such as particulate emissions, the performance of each alternative with respect to all criteria investigated should be synthesized in a reader friendly table. A modified significant impact summary, including significance after mitigation and a life-cycle cost/benefit assessment, for each action alternative is requested.

The most noticeable public process deficiency is the absence of stakeholder identification. Interested groups or individuals include but are not limited to: residents of Searchlight, Native American tribes, developers, ranchers, tourists, boaters, miners, National Park Service, and local agencies. Many of these affected parties are mentioned in specific sections, but a compiled list (most appropriately in the Public Scoping Process section beginning on page 1-8) of everyone with interests would be useful.

Water Resources

The description of the three affected watersheds is included, but little information is presented on how to assess the potential impacts. The available data is limited and properly characterizing existing conditions requires further studies. However, merely presuming existing groundwater quality and flow directions is insufficient for a project of this magnitude. The mitigations for the construction phase include maintaining acceptable water quality conditions, but no actions to monitor potential effects are presented. The potential erosion and runoff effects on groundwater quality is significant and there is no measure of current salinity or suspended solids to compare. While the mitigation measures are appropriate, additional water quality parameters, such as turbidity, should be measured as a gauge for impact intensity.

Since water contamination is unacceptable, there should be thorough mitigation procedures for ensuring that water quality remains unaffected. As presented, actions that ensure the mitigations are successful, in any phase of the project, cannot be found. Equipment monitoring to prevent or identify any leaks or spills is included, but water quality monitoring is also necessary. During storm events, some measure of sediment load should occur for at least one surface water body in

Please refer to the expanded Chapter 5-Consultation and Coordination, for a list of stakeholders, public scoping processes, and coordination with other agencies.

It is assumed that the commenter intended to write "surface water" instead of "groundwater" as being sensitive to erosion and runoff effects. The issues of potential erosion will be addressed in the SWPP, which would be a regulatory requirement for project development.

Refer to the recommended lists of BMPs for monitoring and secondary containment, runoff and erosion control. The Applicant must prepare a SPCC plan for review and approval by NDEP prior to storing regulated substances on site. In the event of a release of hazardous materials or wastes, the incident would fall under the NDEP Bureau of Corrective Actions, which oversees the cleanup of regulated substances that impact air, soil, water and ecological resources. Regarding the commenter's recommendation of performing modeled simulations to estimate impacts, NDEP requires that field assessments be performed, which include sampling and laboratory analyses to quantify impacts of regulated substances released to the environment. Modeling would be a possible future tool for evaluation, but is not considered appropriate nor useful for the initial assessment.

April 18, 2012

each of the three watersheds. This will be an indicator for any unsuccessful erosion control measures. In addition, if a hazardous leak were present and unnoticed, there is no mitigation to ensure the contaminant would ever be identified and removed. Some modeling should be completed to estimate the time it would take for a contaminant to percolate into groundwater. If a leak was found, depths of soil penetration should be modeled to estimate remediation needs. Existing wells outside of the project area should then be monitored for any trace evidence of the hazardous materials used.

The Project's estimates and impacts of groundwater usage are insufficient. The DEIR states on page 4-15 that estimates are based on "similar renewable energy projects in the western U.S.," but no specific projects are mentioned or cited. There is also no criteria for identifying this impact's significance nor is there any mitigation if Searchlight's water supply decreases beyond an acceptable amount. Water rights for the region are indicated on page 3-15, but the report does not describe any potential conflict between water needed for construction and water available after the local water needs are satisfied. Attempting to quantify the percent of available water resources that will be utilized for the Project would be a significant improvement to the currently identified water use impacts. A direct assessment of the Project's water availability impacts on the Searchlight Water System (SWS) could provide context on the volume estimates of water use. Residents of Searchlight and other water rights stakeholders deserve to know that their claims will not be affected when water demand is increased during construction.

The potential effect on surface water quality and runoff behavior will also be significant but mitigation procedures are not well defined. For example, Applicant Proposed Measure 4 (APM 4) is referred to frequently, but only states that a Stormwater Pollution Prevention Plan (SWPPP) will be developed. This proposed measure gives no detail on any specific components of this plan. Construction impacts to surface water are declared to be mitigated by APM 4, but the components of this plan are not presented so mitigation is not ensured. Mitigation Measure (MM) WATER-7 discusses some visual assessments of stormwater impacts, but the relationship between this and APM 4 is unclear. If the meaning is such that the measures listed in MM WATER-7 will become part of APM 4 then this should be explicitly stated. Additionally, the actions proposed in MM WATER-7 are not sufficient to identify contaminants or harmful levels of sediment in surface water. A suggested approach is to measure water quality parameters

The projected water use the construction and operations and maintenance of this project are considered reasonable estimates and are based on past project within the southern portion of the State. Nevada water laws are designed to protect existing, appropriated water rights. 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. In the event that existing water resources are found to be insufficient for the construction and/or operation of the proposed project, then an alternative water source will be pursued. 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 would procure water from local willing sellers.

The SWPPP cannot be prepared until the WTG project design is available. The project Applicant will prepare a site specific SWPPP once the actual project footprint (number and locations of WTGs, roads, laydown yard, structures, etc.) is established. The SWPPP, which will describe a monitoring plan with thresholds and BMPs, must be approved by Clark County DAQ prior to issuance of a construction permit.

April 18, 2012

(TSS, pH, etc.) in surface runoff before, during and after the project construction. An analysis of at least one sample, before and after construction, for any petroleum or hazardous waste contamination would reassure the public that there is a commitment to environmental preservation.

While it might be insignificant, the additional load on the region's wastewater treatment system should be evaluated. There is currently no mitigation presented that addresses the impact significance of an overloaded treatment system. Technical analysis should be completed to determine the maximum additional load the current system can safely and effectively treat. The results of this analysis should then be used to further compare the two action alternatives. The persons responsible for wastewater management in Searchlight would better prepare for an load increase if they had an estimate of the additional influent.

Use of a surface water simulation model would provide a better estimate of the cumulative effects of altering 230 acres of land versus 152. Some USGS models that might be appropriate for the Project region include: FESWMS, PRMS, and SWSTAT. FESWMS is a two-dimensional flow model used for simulating change to hydraulic conditions over broad horizontal plains. PRMS has the ability to model hydrologic processes from precipitation on a large watershed scale and can account for evaporation, transpiration, runoff, infiltration, and interflow. SWSTAT uses time-series data to generate hydrograph tables and curves, which can assist in watershed management. One or more of these models could be used to predict different flow scenarios over altered terrain and help assess erosion potential. For summaries of and links to these and other models, see: http://water.usgs.gov/software/lists/surface_water/. Quantifying current and predicted flows leaving each of the three watersheds could be used to determine sediment transport capacities. These capacities would then provide guidance on sedimentation control measures to prevent excess erosion and deposition.

In general, the water resource impacts are addressed generically and not technically. There are issues with several other APMs being too vague and failing to directly identify actions that will be taken. Also the presentation of impacts fails to meet the specifications of intensity and context of significance listed in the Environmental Consequences section of the DEIS. A clearer approach would be to directly present the context and intensity within each affected resource section. Lastly, there are instances of water volume estimates that lack an acknowledgement of

The proposed project has no plans to connect to the CCWRD treatment facility. Per Section 4.3.2.2-Proposed Action – 96 WTG Layout Alternative, a commercial contractor will bring in Temporary portable restrooms during construction. Following construction, the O&M building will be equipped with a septic system for treatment of sanitary wastewater that must meet the requirements of, and be permitted by the Southern Nevada Health District.

Comment noted. Hydrologic modeling may be utilized, as necessary, in the selection of BMPs for the SWPPP.

APMs, such as SPCCP, SWPPP, Dust Control Plan, all have very specific components, which would be addressed prior to approval by the appropriate regulatory agency.

April 18, 2012

uncertainty in their value. An engineer might be interested to know if 4000 gallons of water used per day is plus or minus 10 gallons or 500 gallons. These uncertainties could add up over the length of the construction period (also a broad estimate) to an impact more severe than initially identified. A suggestion might be to include a safety factor in all water volume measurements to buffer any unexpected additional usage that could come from extended construction times or other unforeseen project changes.

Aesthetics

Foremost, the map depicting the key observation points (Figure 3.9-1) is not easily readable. The extent of the 50 mile radius is important to visualize, but several of the Key Observation Points (KOPs) nearest to the Project site could be identified on a map that has a smaller scale. In addition, the Visual Resource Management (VRM) classes for the project site are supposed to be visible in this figure, but they do not appear anywhere in the legend or on the map. It is possible that the wrong figure was referenced in which case this can be easily corrected.

One issue that could be improved is the images used to represent visual impacts. Within some of these existing and simulated picture comparisons (e.g., 4.9-1, 4.9-5, and 4.9-6) the exact location of the Project within the viewshed is undefined. A simple circle or arrow identifying where the Project lies within these views would enhance the reader's understanding of impact assessments. In many of these cases, the existing and simulation look exactly the same. If the simulated components of the images (i.e., the WTGs) were lost in the creation of the document then the DEIS should be republished with the corrected view. If there is no error in the image representation, then many of these comparison photos are unnecessary and the impact can be deemed insignificant.

One missing component that could enhance the Visual Resources Impacts section is a case study of a similar project. There are large wind projects that have been developed in similar terrain and some documentation of successful aesthetic mitigations should be available. Where similar sized WTGs were installed, some photographs of the structures from distances that correlate to the KOPs would provide a better perspective than some of the simulated images presented in the DEIS. Public feedback on the impacts to aesthetic quality after the implementation of similar projects would also be beneficial.

As requested, KOPs closer to the project area have been depicted on smaller scale maps. VRM Classes for the project area are visible on Figure 3.9-2. Visual Resource Management Classes near the Proposed Project Area. Text has been revised to reflect such. The incorrect figure was referenced. Text has been corrected to refer the reader to Figure 3.9-2. Visual Resource Management Classes near the Proposed Project Area.

KOP maps depicting the locations of the KOPs have been updated to illustrate the exact location of the Project. Also Visual simulations were evaluated at the recommended size and hazy conditions were taken into account; therefore, the contrast ratings were correctly evaluated. BLM visual resources specialists reviewed these evaluations. As full size visual simulations (approximately 20x60 inches) cannot be included in the EIS due to size constraints, the visual simulations in the EIS have been updated and scaled to appropriately and accurately compensate for the use of the wide-angled panoramic view.

Comment noted.

April 18, 2012

The attempted methods for assessing aesthetic effects are mindful of sensitive views but do not provide an adequate method for comparing alternatives. An improvement to this method could be the assignment of arbitrary numerical values to the aesthetic levels of strong, moderate, weak, and none. While these qualitative descriptors are an adequate representation of visual contrast effects, numbers could be used and summed to obtain an overall change in contrast for each alternative. Another potential metric could be the percentage of a given KOP view that is obstructed by either the construction phase or completed WTGs. This would aid in the evaluation of the two proposed action alternatives. With the current evaluation technique, assessment of diminished aesthetic impacts resulting from nine fewer WTGs and two miles less of road construction is not possible.

Assessing the viewshed value at each KOP is difficult for the reader because the distinguishing aesthetic characteristics are not thoroughly explained. There could be better descriptions of form, line, color, texture and landscape contrast. The introduction of class II and III VRM areas is a useful way to assess different KOPs, but there is no description of which KOP belongs to each class. The addition of this information as a column to Table 3.9-1 would be sufficient. As a result, the reader is left with a paragraph description of each KOP to determine how protected the aesthetic value is. KOP 6 seems like the most sensitive, yet it lacks. Though it is not a major issue, it might be useful to point out an unfinished sentence at the top of page 3-67. The text is published as follows: "The only visible manmade feature in the view is ." Considering that the views from this KOP are of high scenic value it should be noted which structure is in view and describe its appearance.

Socioeconomics

The socioeconomic section should also be improved with a few additions and clarifications. First, there should be some justification for choosing a 3% discount rate and a 20% salvage value. Choosing these values is discretionary, therefore a sensitivity analysis of project costs to discount rate and salvage value should be included. The additional jobs that the Project would create is a good metric for comparing social costs between alternatives. However, it is not useful to see number of jobs reported with decimals (e.g., 47.9 jobs, page 4-102) and the values should be rounded down to the nearest whole number. It is also not mentioned how the estimate for jobs is generated or how much uncertainty is involved. Disclosure of the method(s) used to

The BLM asserts that the visual impacts would be similar for each alternative.

Text in Section 3.9.4.8 Selection of KOPs, on page 3-67 has been corrected.

The VRM is the area in which visual alteration would take place, rather than the area in which the KOP photographs were taken.

Refer to Section 4.12-Socioeconomic Impacts for discussion of assumptions and methods. Salvage value based on estimate by project engineers.

April 18, 2012

Comment noted.

generate all the socioeconomic data is needed to properly verify the results. Lastly, The economic costs and benefits, as well as job creation, for each action alternative should be added to the comparison of alternatives in tabular format to present key differences in socioeconomic factors.

Conclusion

The effort put forth in identifying all environmental impacts associated with the Project is appreciated yet minor additions to the analysis would improve the effectiveness of mitigation efforts. Overall, the report is compliant with NEPA procedures and appears to be written with the intent of NEPA in mind. The most beneficial additions to the analysis would include some form of surface water modeling and a detailed effort to sample water quality parameters before and after construction. The aesthetic section would benefit from clarity in KOP descriptions and a quantification of visual attributes that would show what is sacrificed for the extra 20 MW of power. Enhanced economic comparisons between the two action alternatives are also recommended.

Thank you for considering my comments,

Zachary Stanko

Greg Helseth, Renewable Energy Project Manager
BLM, Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130

Bard College at Simon's Rock
84 Alford Road
Great Barrington, MA 01230

Dear Mr. Helseth,

We would like to submit these comments for the Draft Environmental Impact Statement (DEIS) for the Searchlight Wind Energy Project (NVN-084626). We are concerned about the project for the following reasons:

1. Construction, operation, and maintenance of the wind turbine generators (WTGs) could have significant impacts on local wildlife which we feel the plan addresses inadequately. For example, the impact statement makes no mention of the indigenous sage grouse, which is known to be sensitive to the electromagnetic fields of overhead and un-insulated underground power lines, and as a result will not cross any areas where these power lines exist. This could be a problem because they could be restricted from moving to breeding grounds. In addition, given the ecological importance of bat species, we feel that Searchlight Wind Energy should provide more information about proposed bat mortality mitigation measures to the public.
2. WTG construction is predicted to have distressingly large consequences on local vegetation. We would like to see additional efforts made to mitigate these effects, and protect against loss of habitat for local wildlife. We feel that the loss of such a large amount of desert tortoise habitat, in particular, is unacceptable and that current measures are not sufficient to prevent significant impacts to the local population of this vulnerable species.
3. We believe that the DEIS failed to consider a full range of alternatives. The National Environmental Policy Act requires the Bureau of Land Management to examine alternatives outside of the jurisdiction of the lead agency. When a map of potential wind energy locations created by The Department of Energy's wind program and the National Renewable Energy Laboratory (NREL) was consulted, Searchlight, NV was revealed to have only "fair" potential to be developed for wind energy. In contrast, similar maps assessing potential for solar development clearly show that Searchlight is located in a solar energy hotspot. For this reason, we believe that with regards to renewable energy development at the Searchlight site, solar energy should be explored as a viable alternative to the building of wind turbines. A solar tower installation would take up less

The proposed project is outside of sage grouse habitat.

A Bird and Bat Conservation Strategy (BBCS) 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).

Comment noted.

The BLM considered a reasonable range of alternatives consistent with NEPA and BLM policies and procedures. Searchlight Wind Energy, LLC has conducted site specific testing (using Meteorological Data collected for 5 years) and determined that sufficient wind exists to support the project. Data collected from MET towers at the application site is proprietary information and is not available. The BLM will not typically analyze a non-Federal land alternative for a right-of-way application on public lands because such an alternative does not respond to the BLM's purpose and need to consider an application for the authorized use of public lands for renewable energy development. The BLM will not typically analyze an alternative for a different technology when a right-of-way application is submitted for a specific technology (e.g., evaluate a photovoltaic alternative for a concentrated solar power application) because such an alternative does not respond to the BLM's

space, present fewer hazards to local fauna, and have a greater capacity for energy generation.

In conclusion, we would like to request that BLM adopt a No Action Alternative for this project and that it designate the area as being inappropriate for the development of wind energy. However, we also would like encourage the federal and state authorities, as well as private companies, to invest in alternative opportunities for renewable energy generation around the Searchlight site, with particular emphasis placed on solar power as a safe and efficient substitute.

Regards,

Juliana Biro

Sarah Trachtenberg

Luke Stroehlein

purpose and need to consider an application for the authorized use of public lands for a specific renewable energy technology