

Private Citizen/Individual's Written Comments

From: Shaun Gonzales [mailto:shaun.gonzales@gmail.com]
Sent: Sunday, April 08, 2012 7:44 PM
To: BLM_NV_SNDO_SearchlightWindEnergyEIS
Subject: Comments on Searchlight Wind Energy Project

Please accept the attached comments on the Searchlight Wind Energy Project draft EIS.

Thank you for your time and consideration,
-shaun gonzales

BLM Las Vegas Field Office
Attn: Gregory Helseth
4701 North Torrey Pines Drive
Las Vegas, NV 89130-2301

Dear Mr. Gregory Helseth

Please accept the following comments in response to the draft environmental impact statement (EIS) for the Searchlight Wind Energy project. I strongly urge BLM to select the No Action alternative until Duke Energy (the project proponent) can reduce or alter the layout of the project to reduce impacts on wildlife and visual resources, particularly in the southern portion of the project.

Project Alternatives

BLM should conduct due diligence to determine whether a smaller or reconfigured project

BLM considered a reasonable range of alternatives consistent with NEPA and BLM policies and procedures. The two action alternatives satisfy the purpose and need in that they fulfill BLM's obligation to consider the ROW application, meet federal renewable energy mandates, and respond to impacts identified in the NEPA analysis. The Applicant has provided BLM with an economic determination that any project generating less than 200 MWs/and or less than 87 turbines is uneconomic due primarily to transmission line costs.

footprint is feasible for the project, since the current preferred alternative – 87 wind turbines—will have significant impacts on the desert tortoise population in the El Dorado-Piute Valley area. The EIS should also lay out in more detail the anticipated impacts on the desert tortoise population, designated relocation sites, and mitigation requirements.

The draft EIS asserts that the 87 wind turbine layout is the smallest project possible while maintaining economic feasibility, but other wind energy projects approved or under evaluation by BLM in similar terrain and using nearly identical wind turbines are significantly smaller. The statement in the EIS that transmission line upgrades are included in the project costs is also ambiguous, since most transmission line costs are passed along to the ratepayer, and not project proponents. Furthermore, a project proponents desired electricity generation capacity—200 megawatts in this case—should not limit consideration of alternatives, and previously approved renewable energy projects have been scaled down to mitigate impacts.

As a comparison indicating likely inaccuracies in the economic feasibility assessment, the proposed Granite Wind energy facility near Apple Valley, California would be built on similar, if not more difficult terrain than the Searchlight project, using similar turbines and construction techniques, and involving a new transmission line. Yet the Granite Wind project is no more than 28 turbines, nearly a third the size of the Searchlight project.

Noise

The Draft EIS should also evaluate the impacts of noise during operation of the wind facility on wildlife. Specifically, wind turbines can emit noise levels at 50dBA just 300 feet from the blades, and 40dBA up to 2,000 feet away. According to Fish and Wildlife Service research compilation, grassland and woodland species showed decline at noise levels as low as 35 dBA.^[1] The draft EIS should evaluate the direct and indirect effects of such a decline in bird populations in the project area during operation of the project, if it is approved.

Land Disturbance

For the sake of special status plant and wildlife mitigation, the BLM should consider “temporary” disturbances as equivalent to permanent, since special status species almost certainly will not be able to return to the “temporarily” disturbed land for the life of the project. Disturbances of desert habitat are known to take decades for full native vegetation to return. Habitat mitigation requirements should be increased accordingly.

Wildlife

Draft EIS does not sufficiently evaluate effects of the project on the desert tortoise, including relocation of tortoises displaced from burrows. The draft EIS asserts that there will be no residual impacts on tortoises, which is inaccurate, since increased road traffic by project operators and recreation users is likely to expose the tortoise to increased risk.

A more detailed discussion on noise impacts to wildlife has been included in Section 4.4.4-Wildlife. Direct and indirect effects to avian species are included in Section 4.4-Biological Resources Impacts.

Comment noted.

Impacts to desert tortoise resulting from increases maintenance and OHV traffic is discussed in Section 4.4.5.2-Desert Tortoise – Direct and Indirect Impacts by Alternatives.

Despite the plans to limit vehicle speed on the new roads, many drivers are unlikely to heed the speed limits on back country roads and given the lack of law enforcement. This will pose a dramatically higher threat to the tortoise in the area.

Comment noted.

Cumulative impact analysis should consider other projects in the Mojave Desert ecosystem that would impact special status plant and wildlife species. Although the cumulative impact analysis considers projects in the immediate vicinity, the multitude of land-intensive energy applications throughout BLM lands in California, Arizona and Nevada will challenge the survival of many species that the Department of Interior is responsible for recovering. The cumulative impacts analysis takes a look at three wind energy applications, but ignores solar projects to the west in the Ivanpah Valley, and several other solar and wind projects in the region.

Section 4.17.5-Potential Cumulative Impacts was revised to include the Searchlight Solar Project and remove project that are no longer viable. Other projects that commenter has mention were outside of the area of cumulative effect as defined by resource in Chapter 3.

The Draft EIS should also consider whether the southern portion of the project will become a population "sink" for tortoises in the El-Dorado-Piute Valley ACEC, if tortoises to the south continually fill habitat with high mortality from road traffic, increased predation, etc.

Comment noted.

Project Benefits

In the analysis of short term and long-term productivity of the environment, the Draft EIS makes the assertion that the project would provide the benefit of reducing our dependence on fossil fuels. However, wind energy projects require natural gas peaker plants due to the intermittency of wind energy generation, and lack of productivity during peak demand. The construction of the turbines also requires carbon-emission intensive processes to manufacture steel, cement, and copper. Unless the EIS intends to thoroughly analyst the emissions created by the project and required energy peaker facilities, the statement should be removed from the EIS.

Comment noted.

Visual Resources

The Draft EIS is misleading in the way that it characterizes visual impacts, which are not mentioned in the cumulative impacts analysis. The installation of 87 turbines and towers over 420 feet high, with a large rotor sweep will change the character of the surrounding mountains and valleys.

Please refer to Section 4.9-Visual Resources Impacts for discussion of the contrast rating analysis, updated visual simulations, and conformance to the Class II VRM objectives. The contrast ratings and visual simulations were reviewed and approved by BLM visual resources specialists in accordance with VRM BLM Manual Handbook H-8431-1.

The definition of Visual Resources Class III is listed as follows:

Class III Objective. The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

Comment noted.

The Draft EIS is inaccurate in its conclusion that the proposed project would be in conformance with Class III objectives, since the height and rotor sweep of the 87 turbines would dramatically alter the viewshed, and their presence would dominate the view as a stark contrast to the natural environment, compared to the lower profile of existing structures, or even a smaller number of turbines. The impact would particularly be high for viewers along I-95 in the southern end of the project (turbines 53-87 in the 87 WTG layout), where the density of the turbines in view would override the natural characteristics of the landscape.

The southern portion of the wind project is also inconsistent with visual resource management principles considering the number of people that view this area travelling along I-95, with nearly complete view of turbines 53-87. The turbines would also be in view for miles along the interstate, and are not consistent with the line, form or color of the existing landscape. As an example of the dominating presence these turbines will impose, consider that there will be about as many man-made structures taller than 420 feet in view of travelers along I-95 near Searchlight as there are in the city of Las Vegas. This is more than “moderate” changes to the landscape scenery, and an additional argument for evaluating another alternative (reduced number of turbines or different layout).

Thank you for considering these comments.

Sincerely,
Shaun Gonzales

[1] The Effects of Noise on Wildlife, USFWS, online, www.fws.gov/windenergy/docs/Noise.pdf

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_snddo_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: _____
Your Name: Jamara Vahlbranken Name: _____
Address: P.O. Box 97237 Address: _____
City/State/Zip: Las Vegas, NV 89143 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:

Comments noted.

To be frank, I am very upset that you would even consider such a massive DESTRUCTIVE project like this!! The infrastructure alone would destroy the many ancient Indian sights and flora and fauna that your organization, by your Mission Statement, is meant to protect and preserve! The turbines themselves would kill our precious eagles and hawks being struck by those 130 ft. blades. Bats trying to avoid those blades getting the "Bends" as the vortex sucks the life out of them! For the community being "helped" by the project, finds an industrial wasteland of noise, blade "strobing", plummeting real estate followed by tourism to cottonwood eliminated from Nevada history, all for "GREEN" energy to get tax credits! I would like to see a supplemental EIS!
Jamara Vahlbranken

to explain how to mitigate the negative impact of this proposal!

Blank lined area for writing.

**Please deposit your comment form into one of the boxes provided at the meeting or
Fold, tape top of form, and mail your comments to the address below:**



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

Meeting Location: SEARCHLIGHT TOWNSHIP
 Your Name: LESLIE COON Name: _____
 Address: 475 ORLANDO ST. Address: P.O. Box 1237
 City/State/Zip: SEARCHLIGHT, NV 89016 City/State/Zip: _____

Please check all that apply:

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Comment:

Searchlight residents are not opposed to renewable energy, but there should be a solar farm instead of a windmill farm. The windmills will be obsolete in a few years and will be abandoned by the installers. They are an eye sore! Our property values will be ruined! Our beautiful desert will be destroyed! I prefer the cottontails, owls, hawks, eagles and coyotes over a view of windmills. The windmills should not be this close to Searchlight. Too close to our homes, school and recreation areas. Biggest issue is the location, location, location!!! And there will be no benefits for Searchlight. We do not want the windmills near our town.

Comments noted.

Unfortunately, you bureaucrats don't care about the citizens voice or our desert. All you care about is lining your ~~own~~ pockets with money! That is really sad for you and the citizens. Our government wonders why the citizens are so unhappy with them. Several reasons have all ready been given. Politicians have become crooks after they get elected, then care about money and not their constituents. I think citizens are really, really, really tired of the cycle. Please revoke the permits you have issued for the Searchlight Windmill Farm. We do not want them in Searchlight.

Please deposit your comment form into one of the boxes provided at the meeting or
Fold, tape top of form, and mail your comments to the address below:

Bureau of Land Management
Las Vegas Field Office
ATTN: Gregory Helseth
Renewable Energy Project Manager
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-2301

RECEIVED BLM
SOUTHERN NEVADA
DISTRICT OFFICE
2012 APR 13 AM 10:45



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

Meeting Location: Searchlight Nevada N.V.
 Your Name: Bruce Debbie Name: _____
 Address: P.O. BOX 582 Address: _____
 City/State/Zip: Cal - Nev - Ariz City/State/Zip: _____

Please check all that apply:

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Comment:

1 - Water is precious to any community. In the three communities affected by this project, water is limited by these aquifers, to the extent that they have been depleted over the years to a concern by its residents. In my opinion if a hundred thousand tons of concrete is to be mixed, how much water will be required times 80 plus wind generators. It must be understood that the water in the ground is all we have.

2 - The pedestals that mount these generators need a level foundation for the cement pour. These areas of consideration need to be blasted by explosives cause this is a hard rock mining area and considerable damage to home will occur. It is probable that the blasting will fracture the aquifers and water will escape to god knows where.

Refer to Section 4.3.2-Direct and Indirect Effects by Alternative, which reads, "The concrete batch plant is expected to use approximately 1.5 acre-feet of water to make approximately 40,000 cubic yards of concrete for construction of WTG foundations, substations, and the O&M building. This is based on the estimated use of approximately 4,000 gallons of water per day over a period of about 5 months." This averages approximately 6 gallons per minute over a 12-hour work day.

From: Cheryl Cross [mailto:searchlightnuggetcasino@yahoo.com]
Sent: Wednesday, April 18, 2012 6:58 PM
To: BLM_NV_SND0_SearchlightWindEnergyEIS
Subject: Wind Energy project

Our beautiful views will be gone for ever. Our beautiful quiet nights will now be very loud.
Also, if we are forced with these windmills, shouldn't we benefit with some power? The community isn't getting anything and giving up so much in return.
Also, in the future our landscape will never be the same and these huge things will always be there as skeletons when new technology replaces them.

Reggie Doing
P.O.Box 1433
Searchlight, Nv. 89046

From: Cheryl Cross [mailto:searchlightnuggetcasino@yahoo.com]
Sent: Wednesday, April 18, 2012 7:05 PM
To: BLM_NV_SND0_SearchlightWindEnergyEIS
Subject: Draft Environmental Impact Statement

I've lived in Searchlight over 40 years. The desert landscape - the mountains mean the world to me.
These windmills are going to greatly impact Searchlight, the people who live here and the tourists coming through our area.
Please don't let this project be approved.

Riley G. Doing

Refer to Section 4.9-Visual Impacts for a discussion of visual impacts.
Refer to Section 4.10-Noise Impacts for a discussion of noise impacts.
Refer to Section 4.12-Socioeconomic Impacts for a discussion on the benefits of the proposed project. As a stipulation of the ROW Grant, the BLM will require a financial bond as described in Appendix C: BLM Wind Energy Development Program Policies and BMPs, page A-4) and a Facility Rehabilitation and Decommissioning Plan as described under APM-10.

Comments noted.



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Bureau of Land Management, Las Vegas Field Office, NV

RECEIVED BLM
SOUTHERN NEVADA
FIELD OFFICE
APR 13 2012

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

Meeting Location: _____
Your Name: _____ Name: ROBERT C FURTEK
Address: _____ Address: 2621 BELLO DR
City/State/Zip: _____ City/State/Zip: N LAS VEGAS, NV 89030

Please check all that apply:

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Comment:

Wildlife Impact:
 ① The area is frequented by birds of prey such as Golden Eagle, Harris's Hawk, Coopers Hawk, Red-Tailed Hawk, and Turkey Vultures. Many species migrate thru this area as well as nest there. The Bald & Golden Eagle Protection Act would apply. At Altamont Pass 50-75 Golden Eagles per year are killed. With 25 years of operation, some 2,300 will be killed from the current propeller style.
 ② 21 of 23 bat species found in NV have been documented in the southern NV area.
 ③ Area is a migration route for desert bighorn sheep.
 ④ Many species of lizards, desert rodents & desert tortoise (NV's state reptile) occupy the area.

Conflict of Interest:
 The wind industry routinely uses false or incomplete EIRs to white-wash the detrimental impacts of propeller wind turbines.

Page 1

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). The decision as to whether an eagle take permit is being requested is between the USFWS and Searchlight Wind Energy, LLC.

Acoustic monitoring of the area was conducted for two years and species documented in the project area are discussed in Section 3.4.4.2-Existing Environment under Bats.

Bighorn sheep use of the project area is discussed in Section 3.4-Biological Resources.

This comment is consistent with the information presented in Section 3.4.3.2-Existing Environment.

Comment noted.



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 Address: _____ Address: 2621 BELLO DR
 City/State/Zip: _____ City/State/Zip: N LAS VEGAS, NV 89030

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Comment:

They kill nesting & migrating birds from Canada and Alaska. Many biologists with FWS, USDA, NDOW are qualified to do surveys but are silenced by policies dictated by the industry according to Jim Wiegand, Biologist, UC Berkeley.

Other Concerns:

- ① Gas line Road is going to be buried only 18-24 inches deep creating a rupture & explosion as occurred at San Bruno, CA a PG&E gas line.
- ② Current prop wind turbines are archaic, In the works are wind turbine designs that will not kill birds. Vertical Shaft Wind Turbines built by Environmental Technologies, LLC are only 11 feet tall and run silent. Before proceeding with this wind farm, more investigation into best technology needs to be done.

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.

Comment noted.