

**EXHIBIT 24****Searchlight Wind Energy Project****National Park Service Concerned**

March 14, 2009

We applaud the National Park Service for sending this letter of concern to the Bureau of Land Management which is processing a massive lease of public land next to Lake Mead National Recreation Area in southern Nevada to Duke Energy for the proposed construction of a large industrial wind farm in the Mojave Desert (see more [>>here](#)). The letter follows.



^Teddybear chollas and Lake Mojave along the Colorado River, in Lake Mead National Recreation Area.

From: National Park Service, Lake Mead National Recreation Area

February 17, 2009

To: Mark Chandler, Realty Specialist  
Bureau of Land Management  
Las Vegas Field Office  
4701 N. Torrey Pines Dr.  
Las Vegas, NV 89130

RE: Searchlight Wind Energy Project

Dear Mr. Chandler:

We have reviewed the proposal for the referenced wind energy project and attended the January 29th public information meeting. We offer the following comments:

The proposal calls for the development of a fairly remote portion of the Mojave Desert located between the community of Searchlight and Lake Mead National Recreation Area. We understand there are a number of avian and bat inventories underway to better understand the impact the proposed facility may have on wildlife. In addition, there are acoustical modeling and visual impact projects planned as part of the environmental impact analysis. The visual analysis should include the view from the Cottonwood Cove Access Road as well as from Lake Mead National Recreation Area (Lake Mead NRA). Although not mentioned at the meeting, we assume cultural resource surveys will also be completed. All of these data are critical

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to understanding the impact of the proposal on the local area and on Lake Mead NRA.

The lands between Searchlight and Cottonwood Cove within Lake Mead NRA have been identified as critical habitat for the threatened desert tortoise. The protection of the desert tortoise is an important consideration in the evaluation of this proposal. How will the management objectives for critical habitat be achieved under this proposal?

The project will require the disturbance of approximately 600 acres of the Mojave Desert of Southern Nevada. Permanent disturbance is estimated to be 125 acres. This will be a significant restoration effort. The National Park Service is very interested in the restoration strategy for these lands. The strategy to prevent the invasion of alien plants and noxious weeds is critical to the management of this project. These concerns extend beyond the construction period and need to be evaluated for the life the project.

At the public scoping meeting, there were questions raised about public access to the lands included in the lease. Our understanding is that the request is for over 24,000 acres to be authorized by this project. This is a huge area and it is our recommendation that only the lands required for the proposal be authorized at this time. Within the lands leased, we understand the public will have access to all but the fenced electrical substations and the interconnect building. The continued use of these lands for public access should be fully addressed as part of this analysis.

The facilities to be developed in this area are significant. The concrete bases for the 161 towers contain approximately 360 cubic yards of concrete. Each of the towers is proposed to be transported on multiple large truck/trailer rigs. The existing Cottonwood Cove Access Road is paved but the pavement is thin and cannot support the proposed level of construction traffic. The edges of the pavement are deteriorating at the current level of use which is primarily recreation traffic. Improvements to the first six miles of road west of Searchlight should be considered if this proposal is approved.

In 2002, the Southern Nevada Public Lands and Resource Protection of Natural Resources Act transferred 10 acres to the National Park Service for administrative use. A park entrance station is proposed to be constructed at this site. In 2008, the Bureau of Land Management (BLM) issued a right-of-way to the National Park Service to allow for road work to extend outside of the original 10 acre site. Attached please find illustrations of the proposed location of the entrance station and a plan view of the entrance station facility.

The location for the entrance station was selected to allow the National Park Service to contact all visitors accessing Lake Mohave along the Cottonwood Cove Access Road. The site selected was approximately 1.5 miles west of the park boundary as a major gravel access road (along Western Area Power Administration's 230 kV power line). This gravel road provides access to Six-Mile Cove, Nine Mile Cove, Mid Basin Cove, Tamarisk Cove and Nellis Cove. On a busy summer weekend there are thousands of visitors using this road to access the Lake Mohave shoreline. The entrance station will begin construction in March 2009 and should be operational by September 2009.

The National Park Service has discussed the extension of the boundary of Lake Mead NRA to eliminate the gap between the entrance station and the park boundary. This would address any confusion the public may have with the entrance station being located 1.5 miles west of the park boundary. The boundary change would incorporate lands within Sections 23, 24, 25 26, 35 and 36 within T28S; R64E. We have attached a map of the proposed boundary adjustment for your reference. The citing of the interconnect facility or any attendant facilities in section 26 could bring significant impacts to the Cottonwood Cove entrance into Lake Mead NRA during peak traffic periods.

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On a larger scale, there are concerns over how much of the public domain adjacent to Lake Mead NRA is available for alternative energy development. Are there other locations where such proposals may be considered? We understand there are over 75 alternative energy proposals under some level of consideration by the BLM in Southern Nevada. What is the management document guiding BLM in the land use decisions relative to dedicating lands for alternative energy projects? How will BLM evaluate the cumulative impact of the many proposals now being submitted for Nevada's public lands? We would like to meet with both BLM and the project proponents to better understand the extent of the ongoing research and analysis.

Should you have questions concerning these comments or require additional information, please contact Mike Boyles, Environmental Compliance Specialists, at (702) 293-8978.

Sincerely,

William K. Dickinson  
Superintendent



^The view of Spirit Mountain from Cottonwood Cove Road in Lake Mead National Recreation Area, with Desert tortoise habitat in the creosote and teddybear cholla habitat in the foreground.

[HOME](#).....[Searchlight Wind Project](#).....[Wind: A Closer Look](#).....[Public Scoping Meeting](#)

