

Private Citizen/Individual's Written Comments

-----Original Message-----

From: Al Burt [<mailto:dcamiadca@yahoo.com>]
Sent: Monday, January 23, 2012 10:48 AM
To: BLM_NV_SNDO_SearchlightWindEnergyEIS
Subject: Windmill Farms

Please consider the following list of public complaints about existing windmill farms - listed in order of number of complaints - before destroying the rural atmosphere of the Searchlight area. Don't forget the negative effect windmill farms will have on lake Mojave.

PUBLIC OBJECTIONS TO WINDMILL FARMS: Cited from some 100 published news articles dated from July 2008 to January 2010 and arranged in order of frequency by William Burt dcamiadca@yahoo.com

Scenery Destruction: Windmill farms perched on mountain ridges, visible from up to 47 miles, "Obscure, Distort, and Detract From the Dignity of the Scenery" (quoting Frederick Law Olmsted) for an area of some 7074 square miles.

Health Hazard: Helicopter like thump-swish noise heard for miles around in a quiet rural setting causes migraine headaches, sleep deprivation, heart disease, and depression. Shadow flicker causes vertigo, panic attacks, and other wind turbine syndrome (WTS) effects.

Bird Hazard: Collisions with turbines kills birds and bats.

Property Value Decline: Caused by anticipated loss of quality of life.

Safety Hazard: Turbine fragments and Ice can fly off windmills in a strong wind.

Spiritual Grounds Violated: Would you want a 450 ft. high windmill attached to your church steeple?

Quality of Life Destroyed: Windmill farms have the same bad effect on a local area as any industrial encroachment.

Radar Interference: Air traffic control, air defense, and weather radars disrupted by windmill reflections.

Unreliable Energy Source: Backup energy source (coal, nat gas, or nuc) needed for windless times.

While anecdotal suggestions of health effects from wind turbine sound can be found online, No evidence exists regarding direct negative health effects associated with wind turbine sound in any peer reviewed, scientific papers or studies.

Impacts to birds and bats are disclosed in Section 4.4.5.11-Migratory Birds - Direct and Indirect Effects by Alternative and 4.4.5.8-Bats - Direct and Indirect Effects by Alternative, respectively. Impacts to Birds and Bats will be minimized by MM-BIO-5 Bird and Bat Conservation Strategy. Additionally, refer to Appendix B-4: Bird and Bat Conservation Strategy (formerly known as the Avian and Bat Protection Plan [ABPP], which has been added to the EIS.

The manufacturer has established recommended setback for safety that was an important contributing element into the design of the project layout. While ice formation on turbine blades is unlikely in this portion of southern Nevada, the safety setbacks provide protection against potential ice throw.

The document includes MM SAFE-5: Aeronautical Considerations. This mitigation measure requires the Applicant obtain FAA approval before construction is to begin.

Comment noted.

Tourism Adversely Affected: Would you visit Philadelphia to see its bus station?

Financial: Locals suffer increased cost of electricity and taxes in some cases.

Mercenary Priorities: Manufacturer's and installer's profits are often emphasized over environmental considerations.

Roads: Construction of required new roads and wear and tear of existing roads disrupts local traffic and causes pollution.

Phone Line Interference: Electromagnetic field emissions from new high power lines can cause static.

Wasted Power: Lack of adequate grid capacity can prevent the exporting of any surplus power.

Farm Land Disruption: Windmill farms and new transmission wires can fracture otherwise contiguous farm land.

National Grid System Upset: Existing grid not designed for sporadic windmill farm power inputs.

Motorist Distraction: Initial exposure to huge windmill farm sightings threatens driving concentration.

Lack of Local Citizen Input: Projects often started without adequate local hearings or comment periods.

Better Options: A single two reactor nuclear power plant, emitting harmless steam into the atmosphere, provides the same power as a 388 mile long windmill farm. Reducing energy waste by 3% per year by pricing in higher energy taxes would eliminate the need for increased energy supply for at least ten years.

Irreversibility: Tower removal and tree replacement not likely even if a better source of power is found later.

Air Flow Disruption: Rotating blades slow natural air flow and induce turbulence affecting downstream winds.

Construction Runoff: Tree removal along with 100 foot wide road construction pollutes local streams.

William Burt

Section 4.12-Socioeconomic Impacts, has been updated with a discussion regarding recreation and tourism.

Refer to Fiscal Impacts in Section 4.12-Socioeconomic Impacts.

Comment noted.

Refer to MM-TRAN-1, which states that a Traffic Management Plan would be prepared to address effects on local traffic.

Section 4.7-Transportation Impacts discloses that streets could receive wear from equipment and deliveries. Refer to MM TRAN-2: Repair Damaged Streets for a description of the mitigation for damaged streets.

No farmlands exist in the proposed project area.

Comments noted.

Refer to EIS Appendix A: Public Involvement for discussion of scoping, public materials, and the DEIS public comment period, and response to public comments for the proposed project.

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

The proposed WTG locations were determined based on a number of factors, including vegetation density and type. As stated in Section 3.3.2.1-Watershed Boundaries and Water Quality, "Applicant would need to see that construction and use of access roads for the Proposed Project do not negatively affect water quantity and quality. These measures could be achieved by implementing a Clark County-approved stormwater protection plan during construction, O&M, and decommissioning of the Proposed Project." The SWPPP, which must identify BMPs and monitoring procedures that are suitable to site-specific conditions, is subject to review and approval by Clark County DAQ.



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_sndo_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: Jack & Carol Nowell Name: _____
 Address: P.O. Box 151 Address: _____
 City/State/Zip: Searchlight NV 89041 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:

My wife & I have live in Searchlight for About 35 years
 as most people here are retired & elderly - No one I ~~know~~
~~know~~ here want these dam wind mls here except
 Harry Reid only because he will make more money -
 He has never done anything for ~~any~~ Any one unless
 there money in it for Harry Reid - They will do
 nothing to help Nevada or Searchlight except cost
 more of this country dose not have to make Eye Sore
 & make noise to drive you nuts - Keep the dam things
 out of Nevada unless you can put them all on
 Harry Reid property

Jack Nowell

Comment noted.

From: Diane Kendall [mailto:diakendall@gmail.com]
Sent: Saturday, February 25, 2012 12:12 PM
To: BLM_NV_SNDO_SearchlightWindEnergyEIS
Subject: Searchlight Wind Energy

Good Afternoon:

I would like to make sure that you receive list from the county commissioners of people who are in favor of the wind energy project.

There was a county commissioners meeting in August, 2010. If you are unable to obtain this list please let me know and I will go directly to Commission Steve Sisolak's office and obtain this list for you.

I believe that this a terrific project, which will enhance our community. I believe that this can be used as a educational devise for students, local property owners and tourists.

The county recently built a walking trail behind the community center with a gazebo facing Spirit Mountain. There are numerous signs around the walking trail educating the public about the area. Since we will be able to see a few of the wind generators from this

location, we could add additional educational signs about the project. Not only can this project educate the public but it will also bring much needed jobs to the American people.

I understand that it is hard for people to accept change, but it is time for change and new technology for power. This project could actually place Searchlight, Nevada on the map as being a forerunner of green energy.

Sincerely,

Diane Kendall
Cell: 702-279-9928
Home: 702-297-1750

Comments noted.

SEARCHLIGHT WIND ENERGY PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

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Bureau of Land Management, Las Vegas Field Office, NV

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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 Comm. Center
Your Name: Gary Kameas Name: _____
Address: 510 State H. Hwy 164 Address: _____
City/State/Zip: Searchlight, NV 89446 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:

- (1) I support the Searchlight Wind Project
- (2) I own two pieces of property in Searchlight, one is on Cottonwood Cove Rd.
- (3) I was present at the BLM EIS meeting + listened to complaints about the aesthetics of this project to which they objected. I do not agree with these complaints on grounds that change occurs as a natural outcome of modernity and the need for renewable energy such as wind + solar
- (4) I also support this project because I trust the developer + BLM will respect the environment + ensure a safe project.
- (5) Furthermore, it seems certain that economic benefits will accrue to Searchlight as a whole + far exceed any detrimental effects that could take place as a result of the project.

Comments noted.

SEARCHLIGHT WIND ENERGY PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Public Meeting Comment Form
Bureau of Land Management, Las Vegas Field Office, NV

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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: CARL & JANE OVERY Name: _____
 Address: P.O. Box 296 Address: _____
 City/State/Zip: SEARCHLIGHT, NV 89046 City/State/Zip: _____

Please check all that apply:

- Add my name to the mailing list for this project *my name is on the mailing list*
- 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:

3-17-2012

Comments:

My main concern, reference the wind-energy project for Searchlight, is reference the BLM Cultural Resource Report. As a historian, I would feel much better if you could assure, not only the citizens of Searchlight but the entire state, that every and all existing examinations for all possible prehistoric and historic archaeological sites have been completed and recorded. If additional, unknown or unrecorded cultural sites are located in the APE additional study should be conducted.

Your report shows that 35 previously recorded cultural resources have been identified within a 2-mile radius surrounding the SWEP area, 7 sites, (five historic and two pre-historic) which are within or near APE.

Because it is impossible to have every step of the APE examined for cultural areas, it is my hope the BLM has put into place plans to investigate and complete additional smaller archeological block surveys at each and every tower site location and on and around any and all access points where land will be disturbed for the planned project as it was for the recently completed meteorological tower placement and the Lake Mead NRA fee station development.

I see by the report five sites, located within the proposed road routes have been determined to NRHP eligible, and as a citizen I am happy these sites have been located and reported, but still feel more sites are still out there. *Sincerely: Jane B. Overy*

Section 3.5-Cultural Resources of the EIS was modified to describe survey procedures in greater detail. An archaeological records search of a two-mile radius of the Searchlight Wind Energy Project was conducted prior to the archaeological inventory. All previously recorded sites were relocated and an intensive pedestrian survey of the area slated for ground disturbance was undertaken with an additional 200-foot buffer. It is standard procedure that if unanticipated cultural resources are encountered additional work would be conducted to mitigate impacts. Four of the 65 sites recorded in the project area have been determined eligible for listing on the National Register of Historic Places and mitigation measures have been determined to lessen the direct or indirect effects from the Project.

2012 MAR 21 AM 10:48

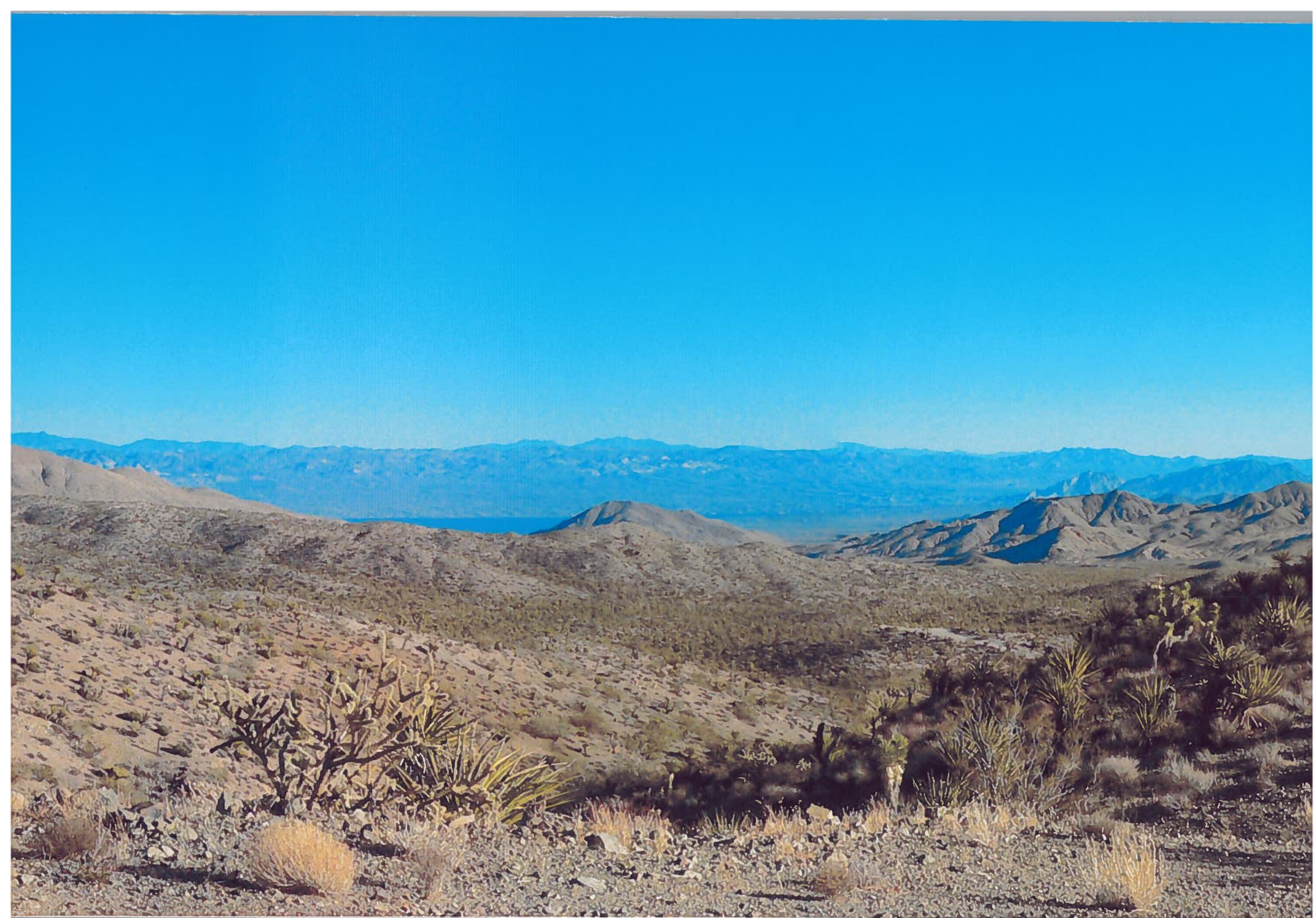
Place
Stamp
Here

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

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:

REFER TO PICTURES OF BEFORE AND AFTER
WIND GR4. ARE UP.
THEY WOULD BE A BLIGHT ON THE DESERT

Paul Cox







RECEIVED
Bureau of Land Management
07:30
APR 03 2012
LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

March 23, 2012

Bureau of Land Management
Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-22301

Re: Duke Energy's Industrial Wind Project at Searchlight (Draft Environmental Impact Statement)

We feel that the proposed project would forever destroy the sensitive pristine and fragile desert landscape of the Mohave Desert/Searchlight/Eldorado Canyon area. This power generation project would cause extreme damage to the eco system and endangered species. It would also have a devastating devaluation effect on private property. We also feel this project would be at the expense of tourism and quality of life for the historic and thriving town and desert community of Searchlight, and would reduce the community and the route to Cottonwood Cove to nothing more than an unsightly Industrial Complex, (converting public lands to a private heavy industrial zone.) We feel that the BLM, (the stewards of our public lands, who are entrusted to preserve and protect) in good conscience, should not support or promote or agree to this project.

If this is such a good idea – let the investors and developers purchase the land and build the project with their dollars – not government grants/subsidies/guarantees/ taxpayer dollars and incentives. Please understand, we are not opposed to the development of power alternatives, but there certainly must be less sensitive and visible options available.

We are also enclosing a page from the March 2012 Sunset Magazine that spotlights the Mohave Desert as "1 of the most endangered lands in the west, due to large scale power projects that are displacing the rare desert wildlife. *Nature.org*"

For the above reasons, we believe the responsible decision on this project should be "No Project".

Thank you *very much* for considering our concerns.

Pat Ehli
Kim Ehli
HC 62, Box 353
Nelson, NV 89046

Impacts to biological resources and mitigation measures are discussed throughout Chapter 4.4-Biological Resources Impacts. APM-10 Site Rehabilitation and Facility Decommissioning Plan would provide for measure to reclaim the area after decommissioning.

To: BLM – Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-22301

Ironic Observation:

The Las Vegas Field Office of the BLM has recently been involved in RESOURCE MANAGEMENT PLAN REVISIONS (RMP's) and ENVIORNMENTAL IMPACT STATEMENTS (EIS) reviewing and reassessing existing (with possible closures) access roads, trails, allowable recreational uses / restrictions and activities in the BLM managed area of Eldorado Canyon/Searchlight/Mohave Desert. This review and the many dollars spent, including public input meetings (that seemed no more than a process) was to better protect (from the public) the sensitive and fragile areas of the desert.

Now, Ironically:

This same agency is actively pursuing and considering approval of an Industrial Wind Energy Project that would cover the same sensitive and fragile desert with hundreds of acres of concrete – not to mention huge, 400 foot noise making turbines and miles of excavated road systems for its construction and maintenance, damaging the desert in untold irreparable ways.

Go figure...

Pat Ehli
Kim Ehli
HC 62, Box 353
Neslon, NV 89046

The BLM manages its lands for a variety of uses. These may include: protecting wildlife and plants, enabling recreational opportunities, allowing mining, and alternative energy development. The needs of some users may be in conflict with those of others.

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.

Sunset Magazine March 2012
See Below

BEST EDUCATION PROGRAM

WHAT DIDN'T HAPPEN

HERE Kids whose only exposure to nature is a glimpse of a tree in a video game.

WHY IT'S A WINNER

The **Wildlands Conservancy** uses its Southern California nature preserves to introduce the outdoors to the Justin Bieber generation—25,000 kids annually, many of whom come from families at or below poverty level.

Its size and emphasis on bringing nature to kids who otherwise wouldn't experience it make the **Wildlands Conservancy** one of the most ambitious environmental-ed programs anywhere. And the kids' reviews would do Yelp proud: "I learned many new things. First, we all went to pick one pretty rock that shines in the sun and we got to see animals. Thank you for everything."

TAKE A LOOK You don't have to be a kid to enjoy Wildlands' preserves. One good one? Wind Wolves Preserve, in Kern County, 95,000 acres where the San Joaquin Valley meets the Transverse Ranges. Sat-Sun; free; wildlandsconservancy.org

Frames help visitors focus on the beauty at Wind Wolves Preserve, near Bakersfield, CA.



BEST LAKE

WHAT DIDN'T HAPPEN

HERE A shoreline jammed with houses, restaurants, and pubs. And motorboats.

WHY IT'S A WINNER

Independence Lake, a half-hour north of Tahoe in the High Sierra, was formerly owned by NV Energy and once used to produce hydropower. It has nothing on its shores except Jeffrey pines, red firs, and some picnic tables. The Nature Conservancy and the Truckee Donner Land Trust fought off a private buyer to purchase 2,325 lakeside acres for \$15 million.

TAKE A LOOK Off State 89, 50 minutes north of Truckee; follow signs to Independence Lake. nature.org

3 most endangered lands in the West

Save them now or they are gone forever

MOJAVE DESERT, CA Two goods collide: Will large-scale solar power projects displace the rare desert wildlife? nature.org

NORTH SHORE, OAHU, HI

At the end of 2011, 27 percent of the North Shore—much of it agricultural lands perched above the Pacific—was up for sale. Will these be developed or stay green? tpl.org/sunset

TELLURIDE AND CRESTED BUTTE, CO

Second-home growth and rural sprawl threaten to spoil these mountain towns' rugged backdrop. tpl.org/sunset

April --, 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](mailto: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). I am opposed to the project for the following reasons:

1. The Purpose and Need Statement should incorporate a "need" to protect wildlife, visual resources, cultural resources, property values and public health.
2. 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.
3. 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.
4. The BLM needs to include an alternative that designates No Action and declares the site inappropriate for wind energy.
5. 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.
6. In some cases, the project would be located within a quarter mile of private property. The DEIS does a poor job of evaluating public health impacts such as Wind Turbine Syndrome and effects from dust stirred up during construction.
7. The project would damage the property values of local residents.
8. 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.
9. 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.
10. 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 no sufficient to prevent impacts to the species.
11. The project would block linkage and movement corridors for desert bighorn sheep.

1) 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.

2) 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.

3) The BLM does not need to analyze in detail an alternative for distributed generation because such an alternative would not respond to the purpose and need to consider an application for the authorized use of public lands for a specific renewable energy technology.

4) Wind Energy facilities must be located where wind resources are available and cannot be limited to "brownfield" sites. 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.

5) BLM evaluated a No Action alternative throughout the document.

6) 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.

7) 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.

12. 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.
13. The DEIS has not evaluated all of the cultural resources located on the site.
14. 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.

In Conclusion

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,

Heidi Spencer
5850 Tuscan Hill Court
Las Vegas, NV 89141

8) Comment noted.

9) 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.

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

11) 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.

12) 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).

Burrowing 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.

13) 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.

14) Impacts are disclosed in Section 4.0-Visual Resources Impacts.

Sincerely,

Gary Carlson

Name
Address

8326 GRESHAM DR.
LAS VEGAS, NV. 89123

Respectfully Submitted,

Donna J Charped

Donna Charped, Executive Director
Desert Protection Society (Formerly Citizens for the Chuckwalla Valley)

Jared Fuller
Provo, UT

Sincerely,

Jared Fuller

Name
Address

2751 Falcon Dr.
Henderson, NV 89052

From: Cheryl Cross [mailto:searchlightnuggetcasino@yahoo.com]
Sent: Wednesday, April 18, 2012 8:33 PM
To: BLM_NV_SND0_SearchlightWindEnergyEIS
Subject: Fw: Searchlight Wind Energy Project from Ms Verlie Doing

----- Forwarded Message -----

From: Cheryl Cross <searchlightnuggetcasino@yahoo.com>
To: "blm_nv_searchlightwindenergyEIS@blm.gov" <blm_nv_searchlightwindenergyEIS@blm.gov>
Sent: Wednesday, April 18, 2012 8:32 PM
Subject: Searchlight Wind Energy Project from Ms Verlie Doing

Gregory Helseth:

My husband and I came to Searchlight June 30,1967. This has been a great place to live. We have an active relationship with Clark County, our own Town Board to work with a great Senior Center, 24 units of Senior housing, and an active functioning Non-Denominational Church. The estimated 1000 residents who live here enjoy great recreation - we are 13 miles from Cottonwood Cove on Lake Mohave - good fishing, boating, and water sports. Our children attend 5 grades at Harry Reid Elementary school, then they are bussed into Boulder City for middle and high school. This is a good place to live for all of us. We enjoy an altitude of 3500 ft. which means cooler temperature, winter and summer. The air is clean most of the time - winds produce some dust but not too bad for most people. There is no doubt that our property values will go down drastically when these are in place. We have enjoyed peace and tranquility for a long time. PLEASE SIMPLY SAY NO!! I am also sending a list of comments we have come up with and consider worth your attention - they come from our study of the Draft of the DEIS.

Mrs. Verlie G. Doing
100 N. Highway 95
Searchlight, Nv. 89046

* Add my name to the mailing list for this project

Comments noted.

Sincerely,

Name *Pauley Steinh*
Address *2755 Saigon Dr.
Henderson, Nv.
89052*

Sincerely,

Name *Charmagne Poyo*
Address *250 E. Shelbourne Ave.
Las Vegas, Nv. 89123*

Sincerely,

Name *PAUL MOUTURE*
Address *220 G. SHELBOURNE AVE
LAS VEGAS NV 89123*

Sincerely,

Susan Vermillion - Muggge
Name
Address SUSAN VERMILLION - MUGGE
8766 LISA LANE
LAS VEGAS, NV. 89113

I own acreage in this area. The proposed wind farm is only 1000 feet from my property. If this wind farm with their noisy turbines is allowed to be built, you will have very effectively ruined my property for any future sale or for me to build on this property. No one will buy this land or build on it when these wind turbines are less than a 1000 feet away. If this goes through you will have made my property worthless.

Sincerely,

Stephen Muggge
Name
Address STEPHEN MUGGE
8766 LISA LANE
LAS VEGAS, NV. 89113

Sincerely,

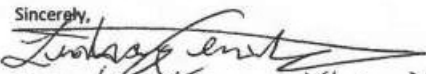
Ashley Pappas
Name
Address 70 Hermosa Palms Las Vegas, NV 89123

Comments noted. 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

Sincerely, 

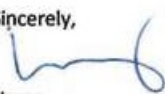
Name
Address

Matthew Morins
3800 Spencer St.
LV NV 89001

Sincerely, 

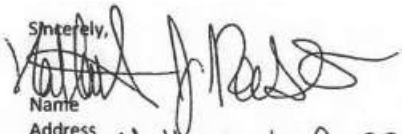
Name Lindsay Klimitz
Address

1688 Mountain Song Ct
Henderson, NV ~~89074~~ 89074

Sincerely, 

Name
Address

Paul Arrigo
1584 Silvestri
LV NV 89123

Sincerely, 

Name Nathaniel Ross
Address

1688 Mountain Song Ct.
Henderson, NV 89074

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, 

Name ARTHUR J MCFARLAND
Address 3093 C PINEHURST DRIVE LAS VEGAS NV 89109

Sincerely,


Name Raven Esty
Address 7660 Hampton Willows Lane
Las Vegas NV 89113

Sincerely,



Name
Address
5 SARDANA
HENDERSON, NV 89041

Sincerely,



Name ELIOT ALPER
Address 2535 EXECUTIVE TERMINAL DR., STE 300
HENDERSON, NV 89052

Thomas Casey
PO Box 1303
Searchlight, NV 89046



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: SEARCHLIGHT COMMUNITY CENTER
 Your Name: JERRY CUROW Name: _____
 Address: 505 E COTTONWOOD COVERD Address: _____
 City/State/Zip: SEARCHLIGHT NV 890460947 City/State/Zip: _____
E-MAIL JCUROW1@YAHOO.COM

Please check all that apply:

- Add my name to the ^{E-mail} 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:

I'M WRITING YOU TO URGE YOU TO ISSUE A LAND USE PERMIT TO SEARCHLIGHT WIND ENERGY PROJECT. I FEEL CLEAN ENERGY IS THE FUTURE OF OUR COUNTRY. I LIVE HERE IN SEARCHLIGHT, AND MOST OF THE OPPOSITION FOR THIS PROJECT IS UNFOUNDED. IT'S EITHER BECAUSE OF SELFISH REASONS OR REASONS THAT ARE PERCEIVED. AS FAR AS I'M CONCERNED ALL NEW BUILDING BUILT SHOULD BE SOLARIZED OR WIND POWERED FOR THEIR ENERGY USE IF ALL PROJECTS FOR CLEAN ENERGY TAKE AS LONG FOR APPROVAL AS THIS ONE, THE UNITED STATES WILL BE DEPENDANT ON FOREIGN COUNTRIES FOR CLEAN ENERGY FOR EVER AS MUCH WIND AS THERE IN HERE AND ALONG THE RIVER THERE SHOULD BE WIND GENERATORS FOR VEGAS TO LAUGH LIN PLEASE MOVE FORWARD ON THIS ISSUE NOW

SINCERELY
Jerry Curow

Comments noted.

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

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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: Jamara VanFranken Name: _____
Address: P.O. Box 97237 Address: _____
City/State/Zip: Las Vegas, NV 89193 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)*

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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 "Bumps" 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 VanFranken



SEARCHLIGHT WIND ENERGY PROJECT
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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:

- Add my name to the mailing list for this project
- Do not include my name on the mailing list
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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 RLM
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:

- Add my name to the mailing list for this project
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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.



SEARCHLIGHT WIND ENERGY PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Public Meeting Comment Form

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:

- 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)*

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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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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:

- Add my name to the mailing list for this project
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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.

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

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
214 E. Shelbourne Avenue
Las Vegas, NV 89123

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 show 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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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!

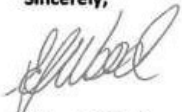
14. **Areas of Critical Environmental Concern (ACEC):** The DEIS specifically states that there are ACECs "adjacent to and surround[ing] the project area". Because the designated project area does not include these lands, no evaluation was made of any direct impacts. However, the DEIS further states 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.

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.

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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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.

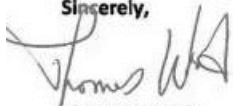
The BLM developed a purpose and need statement and considered a range of reasonable alternatives consistent with NEPA, applicable regulations, and BLM policies and procedures, including BLM Instruction Memorandum 2011-059. The two action alternatives satisfy the purpose and need because they fulfill 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.

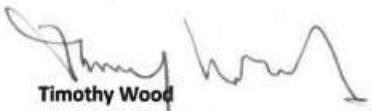
A Bird and Bat Conservation Strategy (BBCS) was developed for the project, which follows the guidelines of the recently published USFWS Land-Based Wind Guidelines (Appendix B-4: Bird and Bat Conservation Strategy).

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 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.

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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.

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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.

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(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.

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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.

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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.

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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