

## State Agency

## Skip Canfield

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**From:** Alex Lanza  
**Sent:** Tuesday, January 31, 2012 2:58 PM  
**To:** Skip Canfield  
**Cc:** Cliff Lawson  
**Subject:** RE: Nevada State Clearinghouse Notice E2012-117 - Proposed Wind Energy Project near Searchlight

Good afternoon Skip;

The Nevada Division of Environmental Protection (NDEP) - Bureau of Water Pollution Control (BWPC) - does not have any comments regarding Notice for SAI: **E2012-117 - Proposed Wind Energy Project near Searchlight, Nevada.**

Please note that **Western Area Power Administration**, who manages this **Wind Energy Project**, may be subject to BWPC permitting for some of its discharges from the buildings associated with the energy production – domestic sewage for example.

Thank you for the information and the opportunity to comment.

If you have any questions, please contact me at (775) 687-9468.

Respectfully,

## Alexi Lanza

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Alexi Lanza, P.E.  
Permits Branch - Bureau of Water Pollution Control  
Nevada Division of Environmental Protection  
901 S. Stewart St., Ste 4001  
Carson City NV 89701

Phone: 775.687.9468 - Fax: 775.687.4684  
www.ndep.nv.gov

Please visit BWPC's main website: <http://ndep.nv.gov/bwpc/index.htm>

Please join our electronic mailing lists: <http://ndep.nv.gov/bwpc/email.htm>

**From:** scanfield@lands.nv.gov [mailto:scanfield@lands.nv.gov]  
**Sent:** Monday, January 30, 2012 10:28 AM  
**To:** Alan Coyner; Alan Jenne; Alisanne Maffei; Nevada State Clearinghouse; clytle@lincolnnv.com; csteverson@ndow.org; BradHardenbrook; Doug Driesner; David Catalano; ddavis@unr.edu; dmouat@dri.edu; Edward Foster; ed.rybold@navy.mil; gderks@dps.state.nv.us; James Morefield; Jason Woodruff; Jennifer Newmark; Jennifer Scanland; muntean@unr.edu; jprice@unr.edu; kirk.bausman@us.army.mil; cohnk@nv.doe.gov; Lowell Price; Mark Freese; Mark Harris; Mike Dondero; deborah.macneill@nellis.af.mil; escomm2@citlink.net; Octavious.Hill@nellis.af.mil; Pete Anderson; Pete Konesky; Rebecca Palmer; Rich Harvey; Robert K. Martinez; Sandy Quilici; Sherry Rupert; Skip Canfield; Steven Siegel; tcompton@dot.state.nv.us; Terry Rubald; Richard Ewell; tmuellet@dot.state.nv.us; Tod.openborn@nellis.af.mil; William.C.adwallader@nellis.af.mil; zip.upham@navy.mil; Joe Strolin; Tim Rubald; Alex Lanza; Dave Marlow; Kevin J. Hill; djohnston@dps.state.nv.us; John Walker; Karen Beckley; Russ Land  
**Cc:** Searchlight\_Wind\_Energy\_EIS@blm.gov  
**Subject:** Nevada State Clearinghouse Notice E2012-117



**NEVADA STATE CLEARINGHOUSE**  
Department of Conservation and Natural Resources, Division of State Lands  
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246  
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 01/30/2012

U.S. Bureau of Land Management

**Nevada State Clearinghouse Notice E2012-117**

**Project: Proposed Wind Energy Project near Searchlight**

Follow the link below to find information concerning the above-mentioned project for your review and comment.

E2012-117 - [http://www.blm.gov/nv/st/en/info/newsroom/2012/january/southern\\_nevada\\_blm.html](http://www.blm.gov/nv/st/en/info/newsroom/2012/january/southern_nevada_blm.html)

- Please evaluate this project's effects on your agency's plans and programs and any other issues

that you are aware of that might be pertinent to applicable laws and regulations.

- Please reply directly from this e-mail and attach your comments.
- Please submit your comments no later than Tuesday March 13th, 2012.

[Clearinghouse project archive](#)

Questions? Skip Canfield, Program Manager, (775) 684-2723 or [clearinghouse@state.nv.us](mailto:clearinghouse@state.nv.us)

\_\_\_\_ No comment on this project \_\_\_\_ Proposal supported as written

AGENCY COMMENTS:

Signature:

Date:

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Requested By:  
Searchlight\_Wind\_Energy\_EIS

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Distribution:  
- Division of Emergency Management  
Alan Coyner - Commission on Minerals  
Alan Jenne - Department of Wildlife, Elko  
Alex Lanza -  
Alisanne Maffei - Department of Administration  
Clearinghouse - zzClearinghouse  
Cory Lytle - Lincoln County  
Craig Stevenson - Department of Wildlife, Las Vegas  
D. Bradford Hardenbrook - Department of Wildlife, Las Vegas  
D. Driesner - Commission on Minerals  
Dave Marlow -  
David Catalano - Department of Wildlife, Fallon  
David David - UNR Bureau of Mines  
David Mouat - Desert Research Institute  
Denesa Johnston - Fire Marshal

Ed Foster - Department of Agriculture  
 Ed Rybold - NAS Fallon  
 Gary Derks - Division of Emergency Management  
 James D. Morefield - Natural Heritage Program  
 Jason Woodruff - Public Utilities Commission  
 Jennifer Newmark -  
 Jennifer Scanland - Division of State Parks  
 John Muntean - UNR Bureau of Mines  
 John Walker - Nevada Division of Environmental Protection  
 Jon Price - UNR Bureau of Mines  
 Joseph C. Strolin - Agency for Nuclear Projects  
 Karen Beckley - State Health Division  
 Kevin Hill -  
 Kirk Bausman - Hawthorne Army Depot  
 Linda Cohn - National Nuclear Security Administration  
 Lowell Price - Commission on Minerals  
 Mark Freese - Department of Wildlife  
 Mark Harris, PE - Public Utilities Commission  
 Mike Dondero - Division of Forestry  
 Ms. Deborah MacNeill - Nellis Air Force Base  
 Nancy Boland - Esmeralda County  
 Octavious Q. Hill - Nellis Air Force Base  
 Pete Anderson - Division of Forestry  
 Pete Konesky - State Energy Office  
 Rebecca Palmer - State Historic Preservation Office  
 Rich Harvey - Division of Forestry  
 Robert Martinez - Division of Water Resources  
 Russ Land - Nevada Division of Environmental Protection  
 Sandy Quilici - Department of Conservation & Natural Resources  
 Sherry Rupert - Indian Commission  
 Skip Canfield, AICP - Division of State Lands  
 Steve Siegel - Department of Wildlife, Director's Office  
 Terri Compton - Department of Transportation  
 Terry Rubald - Nevada Department of Taxation, Local Government, Centrally Assessed Property  
 Tim Rubald - Conservation Districts  
 Timothy Mueller - Department of Transportation  
 Tod Oppenborn - Nellis Air Force Base  
 William Cadwallader - Nellis Air Force Base  
 Zip Upham - NAS Fallon

## Skip Canfield

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**From:** Rebecca Palmer  
**Sent:** Tuesday, March 06, 2012 1:50 PM  
**To:** Skip Canfield  
**Subject:** RE: Nevada State Clearinghouse Notice E2012-117

The SHPO supports this document as written and does not recommend any changes. Thanks.

Comment noted.

Rebecca Lynn Palmer  
Deputy Historic Preservation Officer  
901 South Stewart Street, Suite 5004  
Carson City NV 89701  
Phone (775) 684-3443  
Fax (775) 684-3442

Please note, my email is [rlpalmer@shpo.nv.gov](mailto:rlpalmer@shpo.nv.gov)

---

**From:** scanfield@lands.nv.gov [mailto:scanfield@lands.nv.gov]  
**Sent:** Monday, January 30, 2012 10:28 AM  
**To:** Alan Coyner; Alan Jenne; Alisanne Maffei; Nevada State Clearinghouse; clytle@lincoln.nv.com; cstevenson@ndow.org; Brad Hardenbrook; Doug Driesner; David Catalano; ddavis@unr.edu; dmouat@dri.edu; Edward Foster; ed.rybold@navy.mil; gderks@dps.state.nv.us; James Morefield; Jason Woodruff; Jennifer Newmark; Jennifer Scanland; munteanj@unr.edu; jprice@unr.edu; kirk.bausman@us.army.mil; cohn1@nv.doe.gov; Lowell Price; Mark Freese; Mark Harris; Mike Dondero; deborah.macneill@nellis.af.mil; escomm2@citlink.net; Octavius.Hill@nellis.af.mil; Pete Anderson; Pete Konesky; Rebecca Palmer; Rich Harvey; Robert K. Martinez; Sandy Quilici; Sherry Rupert; Skip Canfield; Steven Siegel; tcompton@dot.state.nv.us; Terry Rubald; Richard Ewell; trmueller@dot.state.nv.us; Tod.oppenborn@nellis.af.mil; William.C.adwallader@nellis.af.mil; zip.upham@navy.mil; Joe Strolin; Tim Rubald; Alex Lanza; Dave Marlow; Kevin J. Hill; djohnston@dps.state.nv.us; John Walker; Karen Beckley; Russ Land  
**Cc:** Searchlight\_Wind\_Energy\_EIS@blm.gov  
**Subject:** Nevada State Clearinghouse Notice E2012-117



### NEVADA STATE CLEARINGHOUSE

Department of Conservation and Natural Resources, Division of State Lands  
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246  
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 01/30/2012

U.S. Bureau of Land Management

**Nevada State Clearinghouse Notice E2012-117**

**Project: Proposed Wind Energy Project near Searchlight**

Follow the link below to find information concerning the above-mentioned project for your review and comment.

E2012-117 - [http://www.blm.gov/nv/st/en/info/newsroom/2012/january/southern\\_nevada\\_blm.html](http://www.blm.gov/nv/st/en/info/newsroom/2012/january/southern_nevada_blm.html)

- Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.
- Please reply directly from this e-mail and attach your comments.
- Please submit your comments no later than Tuesday March 13th, 2012.

[Clearinghouse project archive](#)

Questions? Skip Canfield, Program Manager, (775) 684-2723 or [clearinghouse@state.nv.us](mailto:clearinghouse@state.nv.us)

\_\_\_ No comment on this project \_\_\_ Proposal supported as written

AGENCY COMMENTS:

Signature:

Date:

---

Requested By:  
Searchlight\_Wind\_Energy\_EIS

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Distribution:  
 - Division of Emergency Management  
 Alan Coyner - Commission on Minerals  
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David David - UNR Bureau of Mines  
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 Terry Rubald - Nevada Department of Taxation, Local Government, Centrally Assessed Property  
 Tim Rubald - Conservation Districts  
 Timothy Mueller - Department of Transportation  
 Tod Oppenborn - Nellis Air Force Base  
 William Cadwallader - Nellis Air Force Base  
 Zip Upham - NAS Fallon



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**From:** Skip Canfield [mailto:scanfield@lands.nv.gov]  
**Sent:** Wednesday, March 14, 2012 9:13 AM  
**To:** Patton, Hillerie C; BLM\_NV\_SNDO\_SearchlightWindEnergyEIS  
**Cc:** scanfield@lands.nv.gov  
**Subject:** State Agency Comments - E2012-117 - Draft EIS for the Searchlight Wind Energy, LLC proposal

The Nevada State Clearinghouse provides the attached comments and the comments below regarding the Draft EIS for the Searchlight Wind Energy, LLC proposal.

Skip Canfield  
**Nevada State Clearinghouse**  
**State Land Use Planning Agency**

*Nevada Division of State Lands*  
*Department of Conservation and Natural Resources*  
*901 South Stewart Street, Suite 5003*  
*Carson City, NV 89701*  
*775-684-2723*  
<http://clearinghouse.nv.gov>  
[www.lands.nv.gov](http://www.lands.nv.gov)

The Nevada Division of State Lands and the State Land Use Planning Agency offer the following comments:

Multiple use activities on Nevada's public lands are supported and encouraged. There are continuing concerns about the cumulative visual impacts to public lands users' experiences

from certain activities (temporary and permanent). Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few.

Cumulative visual impacts to public lands users' experiences should be considered.

The following language is suggested that should be provided up front to applicants who propose development on public lands that includes lighting:

**Utilize appropriate lighting:**

- Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices.
- Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas.
- A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan.
- Any required FAA lighting is exempt from this condition, but should be consolidated and minimized wherever possible.

In addition, the following mitigation measures should be employed.

**Utilize building materials, colors and site placement that are compatible with the natural environment:**

- Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided.
- For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities.
- Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications.

Skip Canfield  
State Land Use Planning Agency

MM-VIS-5 in Section 4.9.4-Mitigation Measures has been updated to incorporate these suggestions, as appropriate.



BRIAN SANDOVAL  
Governor

STATE OF NEVADA  
DEPARTMENT OF TRANSPORTATION  
1263 S. Stewart Street  
Carson City, Nevada 89712

April 10, 2012

SUSAN MARTINOVICH, P.E., Director

In Reply Refer to:

MS. STEPHANIE LOCKE, ASST. PROJECT MGR.  
NEWFIELDS  
ENVIRONMENTAL PLANNING & COMPLIANCE  
8250 W. CHARLESTON BLVD., SUITE 100  
LAS VEGAS, NV 89117

SEARCHLIGHT WIND ENERGY  
DRAFT ENVIRONMENTAL  
IMPACT STATEMENT ON USB  
FLASH DRIVE

Dear Ms. Locke:

Thank you for the opportunity to review the Searchlight Wind Energy Draft Environmental Impact Statement. Currently, the project does not appear to directly involve the use of any NDOT right-of-way along US 95 and as such we see no impacts to the Nevada Department of Transportation (NDOT).

If the project will require the use of any NDOT right-of-way for either temporary construction activities or new or modified permanent easements for items such as transmission lines or utility lines, an encroachment permit will be required. Contact the NDOT District 1 office in Las Vegas (702-385-6500) to apply for this permit. No use of NDOT right-of-way is authorized until an encroachment permit has been processed and approved.

Additionally, as needed, appropriate Oversize/Overweight Permits should also be obtained.

Please inform NDOT if there are any changes to the project which would further involve our Department.

Sincerely,

Steve M. Cooke, P.E., Chief  
Environmental Services Division

SMC/DRN/tkb

Information on Nevada Department of Transportation  
Overdimensional Vehicle Permit was added to Table 1.6-2.  
Potential Federal, State, and Local Permits for the Proposed Project.



BRIAN SANDOVAL  
Governor

STATE OF NEVADA  
**DEPARTMENT OF WILDLIFE**

1100 Valley Road  
Reno, Nevada 89512  
(775) 688-1500 • Fax (775) 688-1596

KENNETH E. MAYER  
Director

RICHARD L. HASKINS, II  
Deputy Director

PATRICK O. CATES  
Deputy Director

**SOUTHERN REGION OFFICE**  
4747 Vegas Drive  
Las Vegas, Nevada 89108  
(702) 486-5127 • Fax (702) 486-5133

April 18, 2012

NDOW-SR#: 12-119  
SAI#: E2012-117

Mr. Greg Helseth, RECO Manager  
BLM – Southern Nevada District Office  
4701 North Torrey Pines Drive  
Las Vegas, Nevada 89130

Re: Draft EIS for the Searchlight Wind Energy Project (NVN-084626 and NVN-086777 DES 11-52),  
Bureau of Land Management, Las Vegas Field Office, January 2012

Dear Mr. Helseth:

The Nevada Department of Wildlife (Department) has appreciated the positive and productive planning experience by participating as a cooperating agency since initial announcement of the project many years ago. Overall the Draft EIS reflects incorporation of most of the Department's project recommendations and considerations. Based on the analyses in the Draft EIS, the Department would be supportive of the BLM's Preferred Action for a project design of 87 wind turbine generators as described in section 2.1.2.3 *BLM Preferred Alternative – 87 WTG Layout Alternative* beginning at the bottom of page 2-4. However, we believe there is room for additional refinements to the present document. For example, in performing review of the Draft EIS, the Department found that early inclusion of the various terrestrial wildlife reports as appendices instead of having to make additional requests, per BLM instruction, would have gone far in providing a more time efficient review. Other observations and comments to the Draft EIS include but are not limited to the following.

Page 3-25, Reptiles

The chuckwalla (*Sauromalus ater*), should be added to the list. Use of more specific nomenclature for the shovel-nosed snake would be appreciated, i.e. Mojave shovel-nosed snake (*Chionactis occipitalis occipitalis*).

Page 3-25, Special-Status Wildlife Species

In addition to Nevada Revised Statutes, please note the Nevada Administrative Codes (NAC) identifying state protected, sensitive, threatened and endangered species, i.e. NAC's 503.030 - 503.080.

Page 3-27, Gila Monster

The Gila monster also regularly frequents desert wash habitats.

Page 3-28, Bats and Table 3.4-3

The western pipistrelle is now referred to as the canyon bat (*Parastrellus hesperus*).

Chuckwalla was added to the list. Species name for shovel snake corrected.

Section 3.4.4-Special-Status Wildlife Species updated as suggested.

Section 3.4.4-Special-Status Wildlife Species updated as suggested.

Table 3.4-3 has been corrected.



## Page 3-28, Table 3.4-3

*Macrotus californicus* (California leaf-nosed bat) is a State Sensitive Species  
*Myotis ciliolabrum* (Western small-footed myotis) is a BLM Sensitive Species  
*Myotis yumanensis* (Yuma myotis) is a BLM Sensitive Species

## Page 3-30, Table 3.4-4 Non-Raptor Birds

All of the birds in the table are State Protected (consistent with the Migratory Bird Treaty Act, as amended; 16U.S.C. §§ 703 et seq., and listed in 50 C.F.R. § 10.13- See NAC 503.050) some of which are further classified as sensitive as is noted by superscript (b). Exceptions are for the: Gambel's quail - classified as a Game Bird (NAC 503.045) and noted by superscript (d). European starling is classified as Unprotected as per NAC 503.055. And the Sage thrasher, Brewer's sparrow, and Bendire's thrasher are BLM Sensitive Species (superscript (a)).

## Wildlife Water Developments

No specific descriptive references to wildlife water developments in the project area or discussion of the potential effects of the project to them were readily found in the Draft EIS. There are three units of the Searchlight Series (Searchlight # 3, #4, and #5) of small water developments located within the project area. The three units are in good working order and used by wildlife, especially Gambel's quail. Contextual analyses addressing the conservation and recreational values (hunting and wildlife viewing) of the water developments are requested. For example, will access be modified to the benefit or detriment of the wildlife and wildlife enthusiasts consequential to construction and operation of the wind generation facility? Would there be land use restrictions imposed affecting traditional/historical use of the area and what public affairs efforts would be advisable? Lastly, the Department has responsibility for monitoring and maintaining these wildlife water developments. Should construction and operations impact the water developments directly (and the wildlife dependent on them), what measures would be adopted as mitigation? Should the water developments and the proposed project be deemed mutually exclusive, then the Department would request compensation. For example, in the event a decision to relocate or remove the water developments is tendered, then compensation to reimburse the Department for all aspects in implementing those actions is expected to be the responsibility of the project proponent, inclusive of any administrative clearances (NEPA, Cultural) required by BLM.

The Department looks to the success of the proposed project inclusive of implementing appropriate and reasonable considerations for wildlife and wildlife-related activities. To that end, additional, timely discussion among the Department, BLM, and project proponent is requested prior development of the Final EIS and Record of Decision for clarifying and/or resolving these and related outstanding items. Please do not hesitate contacting me at your earliest convenience.

Sincerely,



D. Bradford Hardenbrook  
 Supervisory Biologist  
 Southern Region, Nevada Department of Wildlife  
 4747 Vegas Drive, Las Vegas, Nevada 89108  
 702.486.5127 x3600; 702.486.5133 FAX  
[bhardenbrk@ndow.org](mailto:bhardenbrk@ndow.org)

cc: NDOW, Files  
 Nevada State Clearinghouse

Table 3.4-3 has been corrected.

Table 3.4-4 has been corrected.

Refer to Section 3.4.4.2-Existing Environment under Upland Game, which has been amended to state that NDOW maintains such water sources. It is not anticipated that the proposed project would affect these sources.

Access to the project area is discussed in Section 4.7.2.2-Proposed Action – 96 WTG Layout Alternative. Impacts to wildlife as a result of increased traffic are discussed throughout Section 4.4-Biological Resources Impacts.

No effects to wildlife water developments are anticipated. However, Section 4.4.5.15-Mitigation Measures was updated to include a mitigation measure (MM-BIO-8) should the proposed project have an effect on a water development.

## Local Agency



LAS VEGAS VALLEY  
WATER DISTRICT

1001 South Valley View Boulevard  
Las Vegas, NV 89153  
(702) 870-2011 • [lvvwd.com](http://lvvwd.com)

RECEIVED PLM  
SOUTHERN NEVADA  
DISTRICT OFFICE

2017 MAR 21 AM 10:49

March 19, 2012

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

Dear Mr. Helseth:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR  
THE SEARCHLIGHT WIND ENERGY PROJECT (NVN-084626)

The Las Vegas Valley Water District (LVVWD) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Searchlight Wind Energy Project (NVN-084626). LVVWD is responsible for providing water service in metropolitan Las Vegas and areas of unincorporated Clark County. LVVWD owns, operates, and maintains the Searchlight Water System, which is governed by the LVVWD Board of Directors. The board has sole responsibility for establishing rates, rules, and regulations for the sale, distribution, and use of water within Searchlight.

Comments noted.

The Searchlight Wind Energy Project DEIS states that approximately 30 acre-feet of water would be required during the 8- to 12-month construction phase of the project for activities including road maintenance, dust suppression, worker use, and concrete batch plant operations. The potential water sources identified include the existing Searchlight Water System or another existing water right (private source) in the Searchlight area. The DEIS also states that approximately 0.15 acre-feet per year from the Searchlight Water System would be required during the operation and maintenance phase of the project. This water would be used as drinking water and for restroom facilities to support the full-time staff.

The existing Searchlight Water System consists of a groundwater production well, S-2, and an emergency backup well, S-1, with limited resource and pumping capacity. Additionally, the place of use for water from these wells, as identified by the Nevada State Engineer, is limited to the town of Searchlight. Although LVVWD is in process of improving the existing Searchlight Water System, we cannot guarantee the availability of water to support this project. Therefore, we encourage communication regarding this project and are willing to assist the proponent in addressing their water supply issues.

Should you have any questions, please feel free to contact Mao Fang at 702-258-7106 or [mao.fang@lvvwd.com](mailto:mao.fang@lvvwd.com).

Sincerely,

Laura B. Jacobsen  
Planning Manager, LVVWD Engineering

LBJ:DB:df

c: Mao Fang, Senior Civil Engineer, LVVWD





CLARK COUNTY • DEPARTMENT OF AIR QUALITY  
4701 W. Russell Road 2nd floor • Las Vegas, NV 89118-2231  
(702) 455-5942 • Fax (702) 383-9994  
Lewis Wallenmeyer Director • Tina Gingras Assistant Director

April 17, 2012

Gregory Helseth  
Renewable Energy Project Manager  
Bureau of Land Management  
Las Vegas Field Office  
4701 N. Torrey Pines Drive  
Las Vegas, Nevada 89130

E-mail: ghelseth@blm.gov

**Re: Draft Environmental Impact Statement for the Searchlight Wind Energy Project**

Dear Mr. Helseth:

The Clark County Department of Air Quality has reviewed the draft environmental impact statement (DEIS) for the Searchlight Wind Energy, LLC (SWE) construction project and determined there will be short- and long-term impacts on air quality from emissions associated with project construction, operation, maintenance, and decommissioning.

SWE has applied to the Bureau of Land Management (BLM) for a right-of-way (ROW) grant on public lands to develop a 200-megawatt wind energy facility. The application encompasses approximately 18,800 acres of BLM-administered public lands near Searchlight, 60 miles southeast of Las Vegas. The project spans Hydrographic Areas 167, 214, and 231, all of which EPA has designated as nonattainment areas for ozone. The DEIS analyzes three alternatives: an 87-turbine layout, a 96-turbine alternative, and a no-action alternative. The BLM prefers the 87-turbine option, which has a smaller footprint than the 96-turbine one. Air Quality also supports this option.

The proposed wind turbines would be up to 262 feet high from ground to hub, with blades extending up to another 153 feet; total turbine height could reach as high as 415 feet. In addition to the turbines, the project would include construction of new access roads, two electrical substations, an overhead transmission line, an electrical interconnection facility/switchyard, an operations and maintenance building, and laydown areas.

Air emissions associated with the proposed project would be primarily short-term (8–12 months). In the construction stage, these would chiefly consist of fugitive dust from disturbed land and engine exhaust from construction equipment. Less significant contributions would be generated by worker commutes and delivery of materials and equipment to the construction site. Operation/ maintenance emissions would be produced by the building's heating and cooling system and by the vehicles for an estimated 15 workers commuting daily to the site. However, there would be no air quality impacts from power generation because electricity generated by wind involves no combustion of fossil fuels.

**BOARD OF COUNTY COMMISSIONERS**  
Susan Brager, Chair Steve Sisolak, Vice-Chairman  
Larry Brown Tom Collins Chris Giunchigliani  
Mary Beth Scow Lawrence Weekly  
Don Burnette, County Manager

Gregory Helseth  
April 17, 2012  
Page 2 of 2

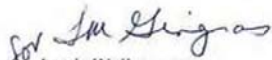
The proposed project has a 30-year life expectancy. Air Quality anticipates that its decommissioning phase would produce a similar amount of emissions, and have a similar impact on air quality, as its construction phase.

As part of its DEIS review, Air Quality offers the following comments:

- All applicants must comply with the appropriate Air Quality Regulations (AQRs). Section 94 applies to all construction activities that disturb or have the potential to disturb soils, and that emit or have the potential to emit particulate matter into the atmosphere, on both public and private lands. In addition, it contains requirements to obtain a dust control permit, develop a dust mitigation plan, and use Best Available Control Measures. These measures are described in the "Construction Activities Dust Control Handbook," available at [http://www.clarkcountynv.gov/Depts/daqem/Documents/DustControl/DustForms/DUST\\_CONTROL\\_HANDBOOK.pdf](http://www.clarkcountynv.gov/Depts/daqem/Documents/DustControl/DustForms/DUST_CONTROL_HANDBOOK.pdf).
- The applicant must apply for an air quality permit for any emission units or stationary sources (e.g., concrete plants, rock crushers, boilers, emergency generators) on the project capable of emitting regulated pollutants, in accordance with Section 12 of the AQRs (including all subtitles).

Thank you for the opportunity to review and comment on this DEIS. If you have any further questions, please contact Robert Tekniepe at (702) 455-4063.

Sincerely,

  
Lewis Wallenmeyer  
Director

Refer to Section 4.6- Air Quality Impacts and Table 1.6-2. Potential Federal, State, and Local Permits for the Proposed Project.

Table 2.6-1. APMs (common to action alternatives) under APM-3 Air Quality/Dust Control has been revised to include this requirement.