NEVADA RURAL ELECTRIC
ASSOCIATION

December 11, 2015

Bureau of Land Management
Carson City District
5665 Morgan Mill Rd.
Carson City, NV 89701

Attn: Colleen Sievers, Project Manager.

Dear Ms. Sievers,
NREA is a member-funded cooperative association representing Electric Cooperatives, Power Districts and one Municipal Public Power utility in Nevada. Please see the enclosed map of NREA utility members.

NREA's mission is to provide power to communities with safe, reliable and affordable electricity and empower consumers to improve the quality of their lives through our commitment to community, renewable energy and energy efficiency in not-for-profit and locally controlled business entities.

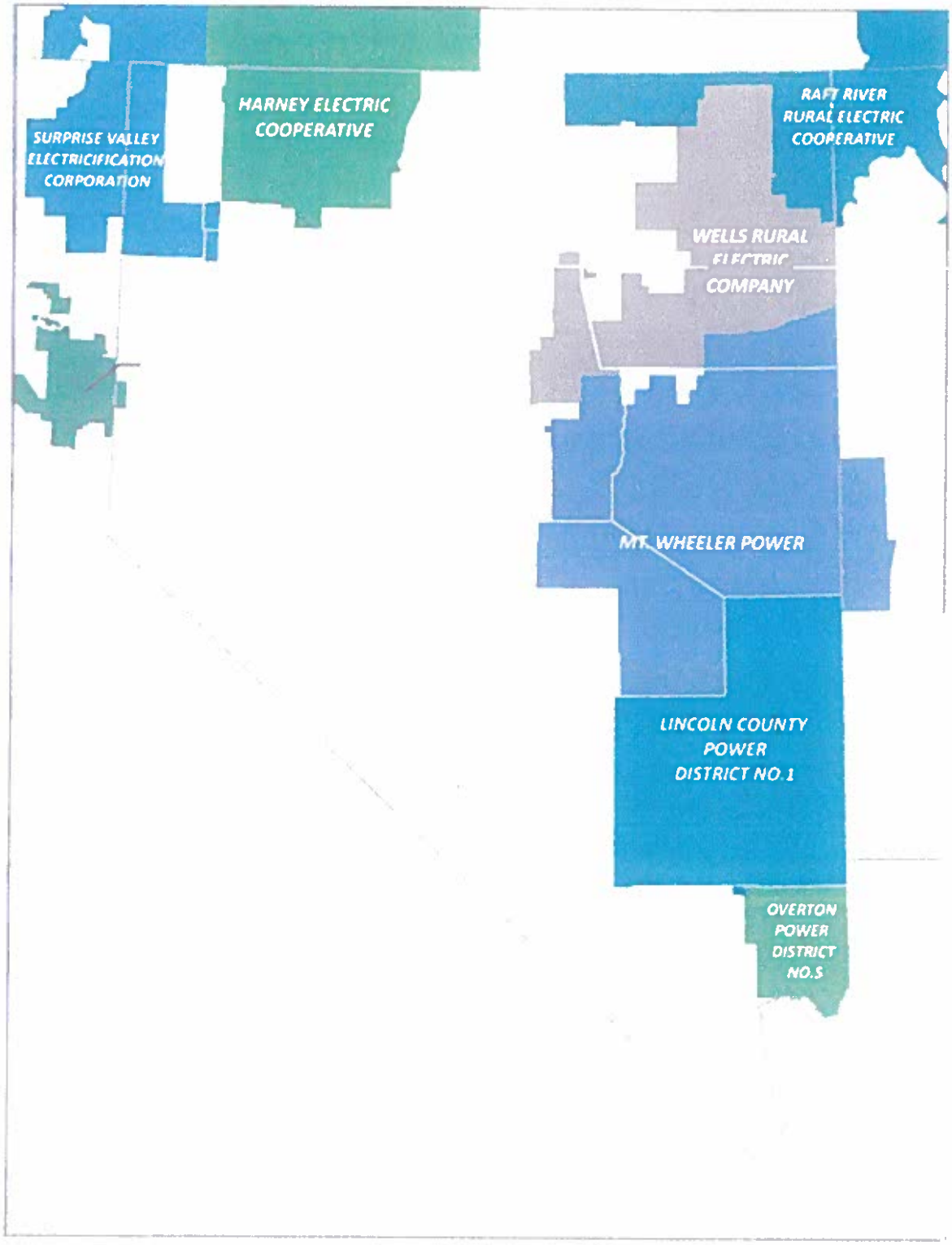
The following comments are a result of input from NREA's utility members representing their utility's owner/members from over half of the Nevada's counties, as well as bordering counties in neighboring states. (Please see the attached service area map of NREA's public power service areas.) The input from all NREA utility members was then considered and incorporated within a review of potential changes to the Proposed Plan as set forth in the *Greater Sage Grouse Bi-State Distinct Population Segment (BSSG) Forest Plan Amendment/Final Environmental Impact Statement* by Power Engineers, an international leader in the design, development and maintenance of power transmission and distribution systems.

We believe the comments contained herein are substantive; based on available science; and, provide sufficient detail for serious consideration within the BLM's decision-making process.

Sincerely,

Clay R. Fitch
Executive Director
(775)752-3328

Nevada Rural Electric - Service Areas



NEVADA RURAL ELECTRIC ASSOCIATION
1894 E. William Street. - Suite 4222
Carson City, Nevada 89701-3202

December 11, 2015

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BLM Resource Management Plan Amendment Comments

Greater Sage-Grouse Bi-State Distinct Population Segment Comments

PROJECT NUMBER:
137056

PROJECT CONTACT:
Ben Bainbridge
EMAIL:
ben.bainbridge@powereng.com
PHONE:
208-788-0391

POWER ENGINEERS

Greater Sage-Grouse Bi-State Distinct Population Segment Comments

PREPARED FOR: NEVADA RURAL ELECTRIC ASSOCIATION

PREPARED BY: BEN BAINBRIDGE
208-788-0391
BEN.BAINBRIDGE@POWERENG.COM

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1.0 INTRODUCTION

The Nevada Rural Electric Association (NREA) would like to thank the Bureau of Land Management (BLM) for the opportunity to comment on the amendments to the *Greater Sage-Grouse Bi-State Distinct Population Segment (BSSG) Forest Plan Amendment/Final Environmental Impact Statement* (FEIS). On November 13, 2015 the BLM requested public comment on the changes and clarifications to the FEIS. Those changes and clarifications included (1) setting disturbance caps within BSSG habitat (C-Wild-S-04); (2) adjusting buffers for tall structures near active or pending leks (L-LUSU-S-04), (3) adding a restriction for new high-voltage transmission lines (C-Min-S-09), and (4) additional management direction for habitat connectivity.

The clarifications and changes are specified in the FEIS *Table 2-5. Standards and guidelines for alternatives B and C, compared to alternative A (no action).*

The NREA and its members are not opposed to additional mitigation requirements and restrictions put in place to protect the greater sage-grouse. However, we do insist that these mitigation requirements and restrictions be based on the current best available scientific data and be applied where they will do the most good for the species. The NREA and its members do not support the whole-sale application of mitigation requirements and restrictions across all habitat for the BSSG.

One issue that is very important to NREA members is the ability to quickly and efficiently access their infrastructure. NREA members strongly oppose the permanent or seasonal closure of any road currently used to access its infrastructure. Seasonal or permanent road closures may limit NREA member utilities' ability to quickly and efficiently access their distribution and transmission infrastructure as an essential service for maintenance and emergency repairs. As an essential service, the utility should be granted emergency access to all roads, open or closed, at any time for the continued benefit of the general public in order to inspect, repair, modify, replace or protect equipment and/or structures.

At a minimum, NREA utility members requests that a clause be placed into all alternatives that would allow closed roads to be accessed in an emergency situation, such as a transmission or distribution line failure, or a wildfire threatening a power line.

2.0 DISTURBANCE CAP

The proposed management of the disturbance cap within the BSSG is described as follows:

- C-Wild S-04: Total anthropogenic disturbances shall affect no more than 3% of the total bi-state DPS habitat on Federal lands within the Bodie Mountain/Grant, Desert Creek/Fales, and White Mountains population management unit boundaries.

- C-Wild-S-05 Total anthropogenic disturbances shall affect no more than 1.5% of the total bi-state DPS habitat on Federal lands within the Pine Nut Mountains Population Management Unit boundaries.

NREA does not support the application of a 3% or 1.5% disturbance cap because the effective boundary of the analysis is not defined. Disturbances which occur directly adjacent to non-habitat or previously disturbed ground do not have the same biological impact as disturbance in otherwise pristine habitat. By placing such low disturbance caps, the BLM is actually encouraging activities in areas which have not been previously disturbed. An area which may have 10%, 15%, or 25% already disturbed and thereby less suitable to sage-grouse is off limits to additional disturbance. Whereas a

pristine area with no pre-existing disturbance is not off limits, so long as the proposed activity does not permanently disturb more than 3% or 1.5% of the area. Transmission and distribution power lines are commonly co-located to reduce impacts to various environmental resources, including cultural, visual, and biological. By imposing a low disturbance cap, the BLM is discouraging such co-location.

For these reasons, the NREA does not support the application of a 3% or 1.5% disturbance cap.

3.0 TALL STRUCTURE BUFFERS

The proposed management for tall structures within the BSSG is described as follows:

- C-LUSU-S-04: Do not install tall structures that could serve as predator perches within 4 miles of an active or pending lek.

The NREA does not support such a large lek buffer which would not allow any tall structures within four miles of an active or pending lek, with no consideration of other existing disturbances (i.e. adjacent power lines) or topography.

NREA members have worked successfully with BLM management and biologists to specifically identify which structures on distribution lines may threaten active leks. NREA members employed a sight-specific line-of-sight analysis using detailed topographic data, lek location, proposed structure location, and proposed structure height to determine which structures would provide a clean line-of-sight to the lek for predators perched on the structure. Structures which did provide a clean line-of-sight were fitted with anti-perching devices to limit predation. Those structures which did not have a direct line-of-site and would not provide a predatory advantage were not altered.

This is one example where NREA members and the BLM used of available resources and a site-specific analysis to work together to provide better protection for greater sage-grouse in areas where it did the most good for the species. Because the proposed management would not allow for such collaborative efforts between utilities and the BLM, the NREA does not support the whole-sale application of the four mile buffer described in the FEIS.

4.0 RESTRICTING HIGH VOLTAGE TRANSMISSION LINES

The proposed management for high voltage transmission lines within the BSSG is as follows:

- C-Min-S-09: Do not authorize new high-power (120 kV) transmission line corridors, transmission line ROWs, transmission line construction, or transmission line facility construction in habitat outside existing corridors.

While many power lines are co-located to limit the potential environmental impacts, high voltage transmission power lines are often purposefully located apart from one another to reduce redundancy within an electrical system and protect against outages caused by isolated events (such as wildfire or ice storms). As stated on page 63 of the FEIS, all existing utility corridors are currently occupied by electrical transmission lines. By limiting the ability to construct new transmission lines to existing occupied corridors, utilities would not be able to achieve the separation desired to protect against outages.

5.0 CONNECTIVITY AREAS

The proposed management for connectivity areas within the BSSG applies primarily to mineral use and vegetation treatment. As NREA members are not directly involved mineral use or vegetation treatments, the NREA does not have comments on the proposed management for connectivity areas.