APPENDIX G PUBLIC WORKSHOPS INPUT AND SCOPING COMMENTS RECEIVED BY CATEGORY

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01.KE-1	I actually represent a group called Basin and Range. But some interesting things about this particular project here. I actually live up in Beatty, Nevada. I just want to tell you what's going on there. It's a good place for the surveyors to stay. And they're going in after hours, you know, in the hotels. They're talking to local people and they're talking about a huge amount of archeology they're finding. And I'm not going to give the exact location of that. I don't like to do that. But, I mean, one of the guys said he's going to lay in front of the bulldozer. And I'm not making this up. I live up there. And I'm just wondering how that can be resolved, because nobody thinks that it can be moved anywhere where there's not going to be that conflict. And you all should know that, because they're not going to just resolve this.
01.KE-8	The company NextEra Energy has come up to Beatty, and they want a project just south of that area. And they're sending up a lawyer represented by Holland & Hart, and he's deliberately getting into the local politics and turning people against each other. This is not a welcome project in Beatty. This is a colonialist project.
01.RAM -1	Thank you for hosting the Greenlink West Project Scoping meeting in Beatty. It was well received, info rmat ive and instructional for the community. After consideration , review, and public input regarding the Greenlink West Project, we submit the following comments for the public record, and for consideration and inclusion in the Environmental Impact Statement {EIS).
01.RAM-3	Below are the items we would like included and addressed in the Greenlink West Project EIS, they include community concerns about the Beatty and Scotty's Junction sections of the Greenlink West line alternatives as proposed .
01.RAM-15	We look forward to continuing our dialogue as the project moves forward through the planning and approval stages.
01.WC-1	AngloGold Ashanti North America ("AGA") submits these comments as public input to the proposed Greenlink transmission line. AGA is a global gold mining company with active mine claims in the Beatty Mining district of southern Nye County. AGA is advancing three mineral exploration projects in the Beatty district. The AGA projects are located on public lands and have Plans of Operation ("POO") on file with the BLM. The cumulative mineral exploration investment by AGA in the Beatty district from 2017 to present is ~$46M. The AGA mineral exploration projects, claim boundaries, and POO boundaries are noted in the attached figure.
01.WC-2	AGA is supportive of alternative energy development and the infrastructure needed to realize and effectively distribute the solar potential of southern Nevada.
02.AGA -1	AngloGold Ashanti North America Inc. (AGA) very much appreciates this opportunity to provide scoping comments for the Environmental Impact Statement (EIS) and Resource Management Plan (RMP) amendments that the U.S. Bureau of Land Management (BLM) is going to prepare to evaluate NV Energy's (NVE's) proposed Plan of Development for the Greenlink West Project. NVE's Plan of Development is for a 474-mile system of new 525-kilovolt (kV) and 345-kV overhead electrical transmission lines, distribution lines, substations, microwave radio facilities, amplifier sites, access roads, and construction/material yards. NVE is asking BLM to grant a 600-ft wide temporary right-of-way (ROW) for project construction, a permanent 200-ft wide ROW for the 525kV line, and a 160-ft wide ROW for the 345kV line. The proposed transmission facilities would affect ~13,767 acres of land, including ~10,438 acres of BLM-administered public lands. NVE's Plan of Development is the Proposed Action that BLM will evaluate in the Draft EIS it will prepare for the Greenlink West Project.
02.AGA-21	AGA very much appreciates the opportunity to present these scoping comments on the proposed Greenlink West Project and looks forward to working with BLM throughout the NEPA process. AGA recognizes that Nevada needs additional electricity transmission infrastructure and generally supports NVE's Proposed Action/Plan of Development to respond to this need. The company also understands the extent of its rights with regard to the mining claims it controls and that it has a >$425M million investment-backed expectation that it can continue to explore and develop its mining claims without being adversely affected by third-party uses of the surface of our mining claims. The two efforts, those of NVE and AGA, are not mutually exclusive so long as BLM follows well established legal precedent and considers the proposed Modified Alternative C.
02.LC-3	Lastly, number three, we don't appreciate a lot of large environmental groups going behind the scenes and talking with BLM in closed room, backroom, smoke-filled room meetings without the public and small grassroots groups.
03.AS-4	Thank you for your consideration in protecting the Tule Springs Fossil Beds National Monument and exploring alternative locations for the Greenlink West alignment.
04.BTAB -1	Thank you for hosting the Greenlink West Project Scoping meeting in Beatty. It was well received, informative and instructional for the community.
04.BTAB-3	Below are the items we would like included and addressed in the Greenlink West Project EIS, they include community concerns about the Beatty and Scotty's Junction sections of the Greenlink West line alternatives as proposed .
05.CD-1	The Greenlink West Project is going to hook into the natural gas plants at Apex near the Harry Allen Substation. It is not just for wind and solar energy. Greenlink in part, is a dirty fossil fuel line.
05.JW-2	As I read the proposal, there will be three new 345kV transmission lines from Fort Churchill Substation: Line 1, 36 miles to Comstock Meadows Substation; Line 2, 33 miles to Comstock Meadows Substation and Line 3, 44 miles to Mira Loma Substation.
06.CVW-1	The Greenlink West Project is going to hook into the natural gas plants at Apex near the Harry Allen Substation. It is not just for wind and solar energy. Greenlink in part, is a dirty fossil fuel line.
06.CVW-6	The use and need for this project is growth. When our planet is in ecological collapse caused by habitat loss, growth is the last thing we need.
06.KE-3	You all should have this info by this time to meet the fast tracked schedule. Here is the map. The roads being improved are in orange. The Beatty Wash Road is about one mile from us. GLWP_Map_Boards_210611_Page_2.png (blm.gov) *[https://www.blm.gov/sites/blm.gov/files/docs/2021-06/GLWP_Map_Boards_210611_Page_2-amargosa-substation-to-esmeralda-substation.pdf]*
07.DA-1	I vote no on the Greenlink West Project. As a so. Clark Couty NV resident since 92. I continue to hate to see "my" desert being constantly graded and invaded by such projects. Does the energy come from fossil fuel? How does that help the environment? It's just not [fossils?]
08.DS-1	It was a pleasure meeting you last night and learning more about how BLM processes a ROW application. I am especially interested in finding out whether the adjacent landholder letters we discussed last night have already been mailed to entities with adjacent land uses and holdings.
08.DS-3	Can you please ascertain the status of the adjacent land holder letters? Additionally, we would very much appreciate the opportunity to meet with you and Mr. Helseth next week to learn more about BLM's regulations for processing a ROW application. We are very familiar with the NEPA process but do not have much expertise with the 43 CFR 2800 ROW regulations.
08.JH-7	So all of that stuff needs to be included in the EIS, or else you haven't really done your job on that. And you'll be subject to failure in courts when you're sued over that stuff. So I would suggest, if you want to go fast on this project, go slow, do the job right.

CID	General Comments/Statements
09.AR-3	NV Energy referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons or invitees of NV Energy, or by any other of NV Energy's affiliated entities.
09.AR-7	This letter shall not be construed, in anyway, as an approval of any portion of the Project.
09.EH-1	"The federal Bureau of Land Management is collecting public comment until Wednesday on a big north-south electricity transmission project that Nevada's main utility, NV Energy, says is a key to its plan for a statewide renewable energy network."
9.EH-6	I am not currently aware of any significant advantages to this proposed project. Therefore, I would oppose moving forward with any phase of the Greenlink Project.
10.ELR-1	The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges. We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats likely occupied by Mojave desert tortoise (Gopherus agassizii) (synonymous with Agassiz's desert tortoise), our comments and the attachment pertain to enhancing protection of this species during activities authorized by the Bureau of Land Management (BLM), which we assume will be added to the Decision Record. Please accept, carefully review, and include in the relevant project file the Council's following comments and attachment for the proposed project.
10.ELR-3	Project information in the NOI indicated that "the BLM will be preparing an Environmental Impact Statement (EIS) for the right-of-way application submitted by NV Energy (Proponent) for the Greenlink West Project. The Greenlink West Project includes a proposed 525-kV transmission line that would begin approximately 10 miles north of Yerington in Lyon County, traverse approximately 360 miles through portions of Lyon, Mineral, Esmeralda, Nye, and Clark counties, and terminate at the Harry Allen Substation approximately 10 miles north of North Las Vegas, Clark County. Three proposed 345-kV facilities would begin 10 miles north of Yerington in Lyon County and traverse through portions of Lyon, Storey, and Washoe counties. Two of the 345-kV lines would terminate approximately 12 miles northwest of Silver Springs in Lyon County, and the third would terminate approximately 7 miles southeast of Reno in Washoe County. The proposed 345-kV facilities cross approximately 10,308 acres of BLM-administered land and 3,712 acres of private land. The four expanded substations (Comstock Meadows, Mira Loma, Fort Churchill, and Harry Allen) and the two new substations (Esmeralda and Amargosa) for the Greenlink West Project would include fiber optic cable and microwave antennae towers for control and operation of the transmission system." Purpose and Need - New transmission infrastructures are required to deliver the anticipated increased demand for electricity in northern Nevada. The Greenlink West Project would alleviatesome of the capacity issues on existing transmission lines, and enhance electric grid reliability, by allowing interconnections to occur throughout the State.
11.AM-1	The U.S. Environmental Protection Agency has reviewed the Federal Register Notice published on May 2, 2022, requesting comments on the Bureau of Land Management's decision to prepare an Environmental Impact Statement and Potential Resource Management Plan Amendments for the Greenlink West Project. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The EPA serves as a Cooperating Agency for the Greenlink West Project and has participated in monthly meetings with the BLM and other cooperating agencies since July 2021. The Greenlink West Project, proposed by NV Energy, includes about 474-miles of new 525-kilovolt (kV) and 345-kV overhead electric transmission lines, distribution lines, substations, microwave radio facilities, amplifier sites, access roads, and construction/material yards. The 525-kV facilities would begin approximately 10 miles north of Yerington, Nevada, traverse 360 miles and terminate at the Harry Allen Substation about 10 miles north of Las Vegas. Three proposed 345-kV lines would begin 10 miles north of Yerington – two would terminate 12 miles northwest of Silver Springs and the third would terminate seven miles southeast of Reno. The proposed transmission facilities would include about 13,767 acres of land – of which approximately 10,438 acres are public lands administered by the BLM. The remaining lands in the project area are managed by the Bureau of Indian Affairs, Clark County, Department of Defense, Department of Energy, National Park Service, Nevada Division of State Lands, U.S. Fish and Wildlife Service, U.S. Forest Service, and private landowners. To assist in the scoping process for this project, we have identified several issues for your attention in the preparation of the Draft EIS. Please consider the attached detailed comments. On April 20, 2022, the CEQ issued its Phase 1 Final Rule1 amending three provisions of its NEPA implementing regulations. The changes address the purpose and need of a proposed action, agency NEPA procedures, and the definition of "effects." The CEQ considers the disclosure of all reasonably foreseeable direct, indirect, and cumulative effects to be critical to the informed decision-making process required by NEPA. We recommend that BLM prepare this EIS consistent with the Phase 1 Final Rule, which became effective on May 20, 2022. We have prepared our scoping recommendations accordingly. We appreciate the opportunity to provide scoping comments on the Greenlink West Project and look forward to working closely with the BLM on this project.
11.JM-4	Again, we appreciate the BLM is getting an early start on planning for the Greenlink project and we appreciate the opportunity to provide comment.
12.ES-4	I have visited Fort Churchill. It saddens me to think of it being impacted by this project. I am sometimes employed as a biological monitor to oversee PG&E vegetation clearing.
13.DS-1	I would say that there's three things that haven't been thought much about in the mitigation efforts and certainly need to be talked about, where the rouse may or may not go, or where this thing should occur. One is the mining. It's going to bring lots of jobs to our communities. The second thing is our conservation movement, which this community has received congressional awards for achieving. And for the recreation value of the land, the third item, which is an item that this community and myself have put hundreds of thousands of dollars into, marketing and advertising.
13.DS-5	That affects the conservation. We don't know how that may affect the conservation from the sheer fact that we don't know what power lines will do to existing Amargosa tillage. You can look that up. It's one of the things that we are famous for here in this town, is preventing that from getting on the endangered species list. So that's going to go by that. The other will go right through my ranch. There's things that we just can't do here. They're going to really be a degradation to our future and what we're doing. I am not against having power sources that tie the state together and help things out, but I think we need to consider all of our community efforts and what we have accomplished in the direction that we're trying to take ourselves in and assist these folks in mitigating those things, and hopefully they'll take into consideration to where motion and movement can take place. There's another thing that's occurred too. We just received from the BLM a grant for a recreational trail system in the area that we all contributed 93,000 to and the town contributed 30,000 to.

CID	General Comments/Statements
13.KE-1	We are providing these scoping comments on the Bureau of Land Management's (BLM) Environmental Impact Statement (EIS) for the Greenlink West Project1 which is proposed to be a system of new 525-kilovolt (kV), 345-kV, 230-kV, and 120-kV electric transmission facilities on private, state, and federal lands between northern and southern Nevada. The project will run from Las Vegas to Reno and include 474 miles of new high-voltage powerlines.
13.KE-3	The proposed large high-voltage transmission line would create significant impacts to western Nevada.
13.KE-9	The proposed transmission line is "green" in name only, and any accompanying solar projects tying into the line would simply provide intermittent energy to this major fossil fuel baseload generation.
13.KE-48	We need a better, cleaner, more people-centered clean energy transition that includes planning in the public sphere for conservation of natural and cultural resources. The smarter alternative to destroying high-value Mojave Desert and Sagebrush-steppe biomes and other arid ecosystems in Nevada is obvious: build solar in the cities, on rooftops, over parking lots, in empty lots, on truly degraded lands close to load centers that will minimize transmission costs. Maximize microgrids connecting to local renewable energy generators and storage components that will provide buffers to utility Planned Power Shut-Offs. And will maximize local jobs, unlike remote desert utility-scale renewable energy projects which almost always bring in out-of-state workers in our experience.
13.KE-50 Part 1	Thank you for considering these comments. Western Watersheds Project and Basin and Range Watch thank you for this opportunity to assist the BLM by providing scoping comments for this project. Please keep Western Watersheds Project and Basin and Range watch informed of all further substantive stages in this and related NEPA processes and documents by contacting us at the email addresses below. References: BLM (Bureau of Land Management). 2018. Redline of Revisions to BLM NEPA Handbook (H-1790-1) Section 6.5.2.1 (page numbers 45-48): 6.5.2.1 Connected Actions. Accessed at https://www.blm.gov/sites/blm.gov/files/policies/PIM2018-023_att1.pdf on May 26, 2022. BLM. 2022a. Low Priority Status letter for Beatty Energy Center. BLM. 2022b. Low Priority Status letter for Sawtooth Solar Project. BLM. 2022c. Low Priority Status letter for Bonnie Claire Solar Project. Jamison, M. A. No date. Rate of Return: Regulation. Public Utility Research Center, University of Florida P.O. Box 117142 Gainesville, FL 32611-7142, Accessed on May 24, 2022 at https://bear.warrington.ufl.edu/centers/purc/docs//papers/0528_Jamison_Rate_of_Return.pdf
13.KE-50 Part 2	https://www.transmissionhub.com/articles/2012/10/nevada-puc-staff-recommends-cost-of-mitigation-issues-with-on-line-not-be-passed-on-to-customers.html
13.PG-1	The Nature Conservancy (TNC) is a non-profit conservation organization working nationally and internationally to conserve the lands and waters on which all life depends. TNC has 37 years of conservation experience in Nevada, where our current work focuses on three primary initiatives: resilient lands, resilient waters, and climate action.
14.CH-1	On behalf of both Hodges Transpottation Inc. ("HTI"), its operational divisions (Nevada Automotive Test Center NATC, NF AST and Westrack) and Break-a-Heart, LLC ("BAH"), please accept this public comment in relation to the Notice of Intent and initiation of the public scoping process issued by the BLM in Federal RegisterN ol. 87, No. 84 on May 2, 2022. It is specifically requested that the entirety of this comment be made part of the public record of the public scoping process and the GreenLink West Project ("GL WP") itself.
14.CH-18	HTI's 60-year history of permits, leases, agreements and studies with BLM is of great imp01tance to its mission statement of testing vehicles and equipment prior to successfully releasing a safe product to the end user, whether it be a civilian or a soldier. Also, as members of the scientific community, HTI suppo1ts alternative, green energy development and generation. To that end, HTI and BAH look forward to working in close connection with BLM, Logan Simpson, NV Energy and all other entities involved in the planning, execution, and construction stages of this project. As such, HTI and BAH specifically requestto be included in all stages of the process of selecting an action route for the GL WP to ensure that the selected alternative not only furthers the GLWP, but does so in a manner that will have a minimal impact on HTI and BAH. To that end, HTI and BAH stand ready and available to pa1ticipate in this project and would welcome any discussion that may be had. *Letter includes five maps.*
14.RS-1	Along with several NGO partners, TWS submitted comments on the BLM/USFS Draft Recommended Changes to the West-wide Energy Corridors, including in parts of Nevada. Comments were submitted at the end of January 2021. As Greenlink West is tentatively planned to follow the WWEC route, we are summarizing our recommendations here, in the context of Greenlink West.
15.CL-1	I am a resident of Beatty Nevada . I am establishing that this e mail address is valid to have a way to express my opinions to you .
16.JB-2	The Greenlink West Transmission Project (GWTP) proposes to hook into the natural gas plants at Apex near the Harry Allen Substation. It is not just for wind and solar energy. Greenlink in part, is a dirty fossil fuel line. It is harmful. It must be rejected.
16.JB-11	Please protect our lands against the Greenlink West Transmission Project by rejecting this application.
16.TP-1	I fully support the project.
18.JB-4	This is not stewardship of our public lands, rather it is turning it over for corporate profits, leave the public and future generations with short-term benefits and long-term destruction.
18.JB-5	It seems these things are of no importance to you and the BLM, but I am writing to ask you to reconsider the decisions you and the BLM are making that will impact critical carbon-sequestering desert forever.
19.JB-6	Build so lar projects on landfills, brown fields, mine dumps, parking lots and rooftops. The former Sunrise Mountain Landfill on the east side of Las Vegas Valley would be a great place to start. Then the power could be utilized by the people who live in the valley, and not transported to Reno area industries, owned by out-of-state billionaires (Musk, Bezos, Buffett, and others). Generate the power where it is needed, and no massive transmission lines through sensitive environments will be necessary.
19.JB-11	This project should not be approved by the Bureau of Land Management.
20.JD-1	I am writing in opposition to the Greenlink West Transmission Project. While I strongly support the transition away from fossil fuels to renewable energy sources, this should not be done by further sacrificing the natural environment. Solar should be developed close to where it is used, not hundreds of miles away necessitating long transmission lines. Furthermore solar should be deployed on rooftops, over parking lots, on already degraded land and over the thousands of miles of highways that crisscross the United States.
20.LC-1	Comstock meadows substation is at Tesla Gigafactory.
21.JGL-1	Thank you for hosting the Green Link West Project Scoping meeting in Beatty. After consideration regarding the Greenlink West Project, we, [*names*], submit the following comments for the public record, and for consideration and inclusion in the Environmental Impact Statement (EIS).
23.JH-1	Thank you for the opportunity to provide scoping comments on the Greenlink West Transmission Project.
23.PD-6	Greenlink North is a major problem.

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24.KB-1	I have read the 24. May 2022 Basin & Range Watch ("public input") biological concerns report about GreenLink West, and I support their opposition to the project, their methodical research and observations. I also have read Letters to the Editors of the PVTimes, by Mr. Hoffman, Mr. Dexter, and now, Mr. Thelford.
24.KB-2	I understand the idea of unintended consequences, but, as of today, I don't think there will be much good done for remaining wildlands, through building - any - 1976 FLPMA-business concept solar "large array" installations.
24.KB-3	I am not an engineer or business owner. I used to work as a wildland firefighter for (western continental US) state and federal agencies, and for contractors. I scan online photovoltaics public news written for small consumers about international speculative investors, because I do think modular "right site" (for - actually - Green) solar energy development, (in cities and close to storage and points of use) is essential. I have recently joined with, and sign with, groups in opposition to utility scale solar "large array" installations, being built on biological refugia (Last Stand) desert wildlands.
24.KB-4	Applications for permits for projects with that business model and era of tech and engineering, are now being considered by the DOI and DOE - with those professional agencies aware - that the old "efficiencies" (gifts from 1976 FLPMA) of building on "free", "unlimited" "wasteland" - can no longer compensate for comparative uncompetetiveness of timed-out "large arrays" tech - vs modular microgrid design. It may be, that if the building of "large array" installations starts, it might not ever be able to pay for itself, - and most unacceptably, - it cannot undo irretrievable damage it will be causing to - other - irreplaceable resources.
24.KB-5	If GreenLink West and Gridliance are permitted, gates to wisely protected reserves of open spaces and water will be opened. Entry of just - The Road - itself, will be the open crack, where Big Realty plans on coming in. Planning is an investment, and Banking will also move forwards, also trying to look Green... Proposed connecting of GreenLink West's questionable "Green-label" business protections, to other already established "old rules" operations, (which, also, are not really Green), allows those operations to continue, and to expand, legally.
24.KB-6	I voted for SB 358, and I regret not actually having reading every line of it. I wish it could be taken back, because with it, energy - and - realty developers can self-create and claim, nolonger-pristine, industrial-affected water and space, that our better planners had kept in place for remaining wildlife. Green, used against - itself.
24.KB-9	Through information from individual researchers and voters' own choice, we accepted heavy responsibilities and economic sacrifices required, in order to have the remarkable 1973 ESA. In answer to that, in 1976, Rights - (and far less binding responsibilities) enabling Business to continue to "Take" at lowest cost from the natural environment were established - for Business, - by Business, only - through other kinds of dealings in the DOI. (Last year's FOIA report on what happened in forced translocation of Yellow Pine desert tortoises; and an understanding, of course, that ancient yucca forests - critical to the functioning desert groundwater/lithic soils moisture vapor exchange column - cannot be translocated). OK with FLPMA Business "invisibles". Please reject corporation applications for permitting installation of technologically timed-out, utility scale, solar "large array" infrastructure on Mojave wildlands. No part of the Mojave Desert is "free", "unlimited" "wasteland".
26.KB-2	Comment consists of a copy of a Letter to the Editor titled "Large solar arrays are not as green as we think" authored by Karen Beyers and published in the Pahrump Valley Times on May 18, 2022. A handwritten note was included: "Hello, Mr. Helseth -- Another reader of the PVT, Mr. Kelly, also mentioned we voted for Green, but not the way Big Solar wants to do it."
26.PG-5	So regarding the NEPA process, as intended, Greenlink West is really proving to be a catalyst for new renewable energy developed interest, particularly adjacent to those two substations. We just urge the BLM to closely evaluate the full environmental impacts of the lines, specifically recognizing the cumulative and indirect effects of those projects near the substations. And to also coordinate closely, and it sounds like, since David Pritchard is here, coordinate with the planning team at the BLM on those corridors. So we look forward to continuing to work with the BLM and seeing those smart from the start principles come into play.
27.KB-1	1) NvBHA appreciates being included in BLM's effort to engage "we the public" in the Greenlink West scoping comment public meetings and process. 2) We recognize that Nevada, the "public land state", is positioned to play a key role in our US response to the challenges of climate change. As such, the role of this project seems ostensibly to speed facilitation of the transition to carbon free energy with a hoped for timely positive effect on the climate: both a worthy and necessary goal. However in our view, success can only be achieved if that process is slow enough to be transparent, deliberative and cost effective with the minimum possible negative impacts on the sustainability of our public land resources, none more vulnerable than wildlife. To that end, utilizing existing transmission rights of way and roadways must be a baseline key strategy. 3) We recognize concurrently that NV, our public land state, has a primary role to play re providing a substantial contribution to our nationwide quest to conserve 30 % of our lands to remain free from development and fragmentation by 2030 ("30x30"), retaining the essential biodiversity of our land. We already have substantial acres under Congressional and state protection designations and more in the pipeline being proposed. This quest, with great potential for success, is at direct odds with the equal potential for success of providing the development side of climate crisis "green energy" solutions. Nothing could be more important than devising a strategy that keeps the maximum beneficial outcomes for both critical solutions toward diminishing negative climate impacts. These efforts must proceed co-operatively and transparently together, inclusive of NDOW, with ample deliberative time and public input.
27.KB-14	NV BHA appreciates the opportunity extended by BLM to participate in scoping and presenting our concerns and ideas for your consideration. We will look forward to a draft proposal reflecting solutions to our concerns, as well as the many others you are likely receiving. In gratitude for your public service, *Also included was the following link: Additional related documentation:* *Congressional Sportsmen's Foundation newsletter 5.31.22* *Report: Industrial Solar Disrupts Big-Game Movements (WyoFile)* *https://wyofile.com/report-industrial-solar-disrupts-big-game-movements/?eType=EmailBlastContent&eId=69556927-519e-4446-8ab0-164d45634acf&eType=EmailBlastContent&eId=d83391c6-7999-4e2d-8ba0-a1e7289121fa*

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27.KB-4	These actions need be conducted before Greenlink West draft is presented to the public: a.) Consultation with NDOW in effort to make proposed route, sub-stations and projected energy or minerals projects along the route be the least impactful to wildlife & wildlife habitat resources. b.) An analysis and evaluation of the current Eastern NV transmission line to determine the cost/benefits to date. Inclusive in costs must be loss of potential tourism, 30x30 contributions and impacts to wildlife, wildlife habitats, cultural and historical resources. These must be not just from the line itself, but also from the attendant projects along the line, whether energy or minerals related. Science data from NDOW must be a key part of the analysis. To do so helps avoid unintended negative consequences from both the W & N proposals. It would provide a useful model for both what are best actions and which are negative.
28.KB-2	And cumulative effects just from the lines alone will not be able to be considered. Let alone, all the energy and mining projects that will be happening, already are happening, along what are proposed routes at the moment, save for the one to the east.
28.KB-4	So -- and it's disconcerting that it's a given that the northern branch is going to be along Highway 50. I'm really glad that you are considering alternatives through sensitive areas. I didn't know that was happening, so that is comforting that is still fluid to that extent. So I hope it's still fluid to the extent of considering alternatives to fit the -- or partial alternatives to that as well.
30.KE-1	From your November presentation - you have not posted any of the others. PowerPoint Presentation (blm.gov) *Powerpoint presentation link provided* "Increase northern Nevada transmission import capacity required to meet native electric demand and Federal Energy Regulatory Commission requests for service".
31.MG-1	I don't -- it's hard to imagine how a Nevada project could be designed to have more of an impact on California than this one. The obvious points are that across the border, California has a federal -- well, it's a state natural communities conservation plan, and the federal conservation plan. Which is about a third of the State of California all along your border. Which involved a detailed study and so forth. But, of course, the Death Valley National Park that you border on. And so I see this as something that has a -- having an interstate impact. And you're encouraging this solar development, which we have plenty of and more than enough of next door. But at least we have more concern -- or, you know, detailed concern. It's gone through a review of state and federal agencies. And the California Energy Commission had the lead on it. But, of course, other agencies were involved in that. So I'm not sure what Nevada has in the way of conservation plans. But that's -- I think that's the key issue that we in California will be expressing concern about. Though my family back in the 1800s were settlers in Clover Valley, so I have some Nevada family background here, which has led me to get involved in some other Nevada issues in the past. Anyway, I think that's probably the most important thing I could say.
32.KK-1	I hope you enjoy the challenge of taking in a large amount of information, carefully evaluating it, and coming to a thoughtful decision. That process is what is needed in evaluating the proposed Greenlinks west transmission line project.
32.KK-2	First, I think it is important to become clear that the Greenlinks west project, despite the name, is not green. Green implies sustainability, but in fact, a main purpose of the project would be to deliver energy to industrial complexes like the Tahoe-Reno Industrial Center (TRI). TRI is a 107,000-acre office park located south of Reno made up of about 130 companies, including Tesla's $5B Gigafactory and shipping centers for Amazon, Walmart, and PetSmart. The goal of these companies is profitability, not sustainability. Sustainability would require that the energy used at TRI be produced locally without impacting other areas. And, although there are signs of adding solar energy, most of the current energy of the proposed energy line would come from existing fossil fuel plants.
33.LM-2	We, the people, own the public land. It should not be abused/destroyed by businesses like Tesla, Amazon, Google, blockchain czars, industrial solar/wind, or even cattle barons, for private gain. Blockchain is especially shameful. We should be reducing our energy use, not increasing it as blockchain does. Solar belongs on roofs, not covering wide swaths of land, destroying it and anything on it in the process.
35.MC-13	The Greenlink West Project is not really "green": since the project will hook into the natural gas plants at Apex near the Harry Allen Substation it is not just for wind and solar energy but also for fossil fuels.
36.MG-1	Question: Is the upcoming Reno national security adverse Greenlink project scoping meeting May 21st or per the BLM website, April 21st? Greenlink comment regarding essential BLM reading for Greenlink: Amory B. and L. Hunter Lovins, Brittle Power: Energy Security for National Security (2018 and 2001) based on their Pentagon study . Michael Garabedian Great great grandfather Elko County Assemblymember Isaac Wiseman 1886-1888 of settlers c. 1858 in Clover Valley south of Wells. Grandmother Edna Sullivan Wiseman sent from Carson City to teach school in Clover Valley. My grandparents moved to California from their Clover Valley ranch with my mother in 1917.
37.MG-2	Motorized offroad recreation including desert racing adds in excess of 100 million dollars annually to the Nevada economy.
37.MG-4	The Nevada Offroad Association continues to support and work with all stakeholders, improving relationships during this and similar projects. This is accomplished by facilitating transparent, valuable, and factual communications between Nevada's offroad community, industry, rural communities, and Public Lands managers.
38.MW-1	I would like to say personally that I think it is disgraceful for the BLM to be used as a tool and an enabler for politicians and multimillion dollar corporations to use public lands to reap profits and to further agendas at the expense of locals and wilderness using jobs as a ransom and climate change as intimidation. Carbon pollution is not the only or even biggest threat to ecosystems and human health. Green energy is a scam plain and simple. It relies on fossil fuels at every step and when deployed on an industrial scale on wilderness land and arid lands especially is a complete fraud and will do permanent, irreversible harm to fragile marginal ecosystems. Won't most of this green energy go to Tesla and Google and Blockchain as well as California. It is not the responsibility of Nevada to help California meet its zero carbon emissions scheme. Those companies can build power generation on their properties.
38.NC-2	I know it's preliminary, but is the plan for Greenlink North to generally follow the highway ROW?
39.MG-4	Cool Middlegate station might be able to get on the grid for power and ditch the generator.
44.H-2	I agree with *[Name]* . Destroying pristine desert is not green.
44.PS-1	The Walker Basin Conservancy administers the federally-authorized and funded Walker Basin Restoration Program to restore and maintain Walker Lake while protecting the agricultural, recreational, and environmental interests of the Walker Basin. Through this program, we have donated more than 10,000 acres and over 20 miles of river corridor to the State of Nevada along the East Walker River, creating the Walker River State Recreation Area. Just last summer, the 100,000th visitor past through the gates of the newest State Park. We have also donated more than 3,000 acres to the Mason Valley Wildlife Management Area, managed by the Nevada Department of Wildlife. Altogether, we have invested more than $100 million of public funds to increase flows to Walker Lake through water rights acquisition to enhance recreation and habitat throughout the basin.

CID	General Comments/Statements
44.PS-5	Through the Walker Basin Restoration Program, the people of the United States have invested considerable resources into protecting the ecology and recreation value of Walker Lake and the East Walker River, and the Conservancy asks the BLM to protect these public investments by minimizing impacts to recreation and habitat. (*Comment includes two citations to publications on greater sage-grouse.)*
51.EG-2	There is another transmission line being proposed; what is the capacity of it/how much energy can it take?
51.EG-5	Thank you Greg. You made some news and I'll be sharing it. We will not stop in our efforts of why this is a bad idea for Beatty.
52.SN-1 Part 1	Friends of Nevada Wilderness appreciates the opportunity to provide scoping comments on the Greenlink West Project. Before we get into the specifics of our scoping comments, we want to set the stage with why we are concerned with some of the proposed alignments for this project. Our mission statement is: "Friends of Nevada Wilderness is dedicated to preserving all qualified Nevada public lands as wilderness, protecting all present and potential wilderness from ongoing threats, educating the public about the values of and need for wilderness, and improving the management and restoration of wild lands." As an organization that can trace its origins back 48 years, Friends of Nevada Wilderness has always kept an eye on the future and promoted the ecological health of Nevada's American public lands and support for Tribal nations who rely on healthy public lands to continue their traditional lifestyles. By necessity, as the climate crisis has wreaked havoc across Nevada's wildlife habitats, wild lands, and ecosystems in the last two decades, Friends of Nevada Wilderness has focused on supporting federal management decisions for healthy, sustainable, and enduring public lands. In addition to supporting protections and designations for all qualified wilderness lands, Friends of Nevada Wilderness offers strong support for larger, landscape scale decisions that promote the ecological health and sustainability of public lands and help ensure the continued viability of Tribal nations. Friends of Nevada Wilderness has worked for and supported designations of Wilderness, Lands with Wilderness Characteristics, National Monuments, National Parks and National Conservation Areas throughout Nevada. As part of our educational outreach, Friends of Nevada Wilderness leverages opportunities for outdoor recreation across the American public lands of Nevada. Outdoor recreation provides an effective venue for teaching the public, first-hand, about the values of wild lands and protecting the integrity of ecological systems for the future of wildlife and coming generations of humans.
52.SN-1 Part 2	Friends of Nevada Wilderness also recognizes that the rural communities of Nevada have been, and continue to be, plagued by the economic rollercoaster-ride of resource extraction boom and bust cycles throughout the history of Nevada. Friends of Nevada Wilderness believes that recognition and promotion of public land outdoor recreation can help stabilize, support, and assist rural Nevada communities thrive in a sustainable manner. To meet these objectives, Friends of Nevada Wilderness has supported the formation and mission of the Nevada Division of Outdoor Recreation, worked with the Nevada Division of Tourism (Travel Nevada) to create and promote the Park to Park in the Dark Route, and is currently working with communities, counties, and towns on establishing America public land tourism destinations throughout Nevada. The greatest threat to the wildlife and ecological integrity of Nevada's American public lands comes from the catastrophic consequence of human-induced global warming. Without addressing and immediately reducing the amount of carbon being dumped into the Earth's atmosphere, everything that Friends of Nevada Wilderness cares about and is working for will be threatened. In light of this, Friends is committed to supporting statewide, nationwide, and global transition to a renewable energy, fossil fuel free, and reduced CO2 future. That being said, if this renewable future comes at the cost of excessive, poorly planned, and ecological damaging development of Nevada's American public lands, Friends of Nevada Wilderness members, the residents of Nevada, and all Americans will lose one of the precious and rare resources remaining in the West.
52.SN-6	Nevada's greatest resources are the natural American public lands. Since the last RMPs were completed in the last century, nature-based outdoor recreation has increased dramatically on Nevada's public lands. The West has seen a 30% increase in visitation as a result of Covid alone, and the number is expected to stay high and grow even more. Recognition and promotion of American public land outdoor recreation can help stabilize, support, and help rural Nevada communities thrive in a sustainable manner. Recreational tourism is becoming an important aspect of the regional economy for Nevada, especially in central Nevada. Within the past decade, the state of Nevada and a broad coalition of communities, towns, counties, and organizations have worked with the Nevada Division of Tourism (Travel Nevada) to create and support the new Nevada Division of Outdoor Tourism. Working with the state, this coalition has created the Park to Park in the Dark Route to promote Astro Tourism and Outdoor Tourism destinations within communities and across the public lands of Nevada's backcountry.
52.SN-7	Outdoor Recreational tourism depends on natural landscapes and visual resource integrity. While utility corridors and photovoltaic solar development momentarily contribute to the economy of rural communities during the construction phase, they only contribute to the crippling boom and bust cycles that have plagued these communities for generations when the construction phase is finished and the labor needs vanish. Power transmission lines and industrial solar developments are in direct conflict with outdoor recreational tourism and the potential for economic stability that it can produce.
53.WB-13	A number of 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas. Keep Nevada Wild and Old! Old beautiful Nevada! A rarity and gem, and one of the most beautiful places on the planet. More remote than Alaska. This marvelous planet on which we reside has evolved to take us where we are now, and will evolve. Unless we reduce our consumption of earth's resources and respect that water is a finite resource, we can slap the entire desert from Beatty to Mongolia with solar panels and transmission lines. Whatever Nevada does, will never compensate for China, India, Pakistan, Russia. Keep Nevada Wild and Beautiful.
55.BH-4	Because of the rapidly increasing negative effects of human-induced global warming, or climate change, we need non-fossil fuel power generation as soon as possible. The real possibility of generating non-polluting electricity without destroying our precious deserts for present and future generations must be fully explored.
57.KD-2	Please ensure that the beautiful rural areas around Austin, Ely, Yerington, and Elko remain pristine and untouched.
57.KD-6	Thank you for allowing me the opportunity to voice my concerns. These unsightly power lines are unnecessary and based upon the NV Energy proposal are NOT required to supply power to our state and its residents. I believe the impact overrides the need!!

CID	General Comments/Statements
65.GV-1	Be aware that some highly publicized energy infrastructure projects such as long-distance transmission lines, bladed wind turbines, photovoltaic panels, fuel cells, small modular nuclear reactors, hydrogen, electric vehicle charging stations, geologic storage of nuclear waste, fossil fuels, and 5G are obsolete. Billions are being spent subsidizing nuclear power, wind turbines, and photovoltaic panels. May I suggest spending 1% on developing and deploying some of the 50 or so clean new generators profiled below? The Gallery of Clean Energy Inventions is linked at padrak.com/vesperman. The Gallery of Clean Energy Inventions displays profiles of 27 Larger Generators, 35 Smaller Generators, 29 Advanced Self-Powered Electric Vehicle Innovations, 29 Radioactivity NeutralizatiBe aware that some highly publicized energy infrastructure projects such as long-distance transmission lines, bladed wind turbines, photovoltaic panels, fuel cells, small modular nuclear reactors, hydrogen, electric vehicle charging stations, geologic storage of nuclear waste, fossil fuels, and 5G are obsolete.
65.GV-3 Part 1	The Gallery of Clean Energy Inventions is linked at padrak.com/vesperman.The Gallery of Clean Energy Inventions displays profiles of 27 Larger Generators, 35 Smaller Generators, 29 Advanced Self-Powered Electric Vehicle Innovations, 29 Radioactivity Neutralization Methods, 30 Space Travel Innovations, 23 Technical Solutions to Water Shortages, and a Torsion Field School Network. The new self-charged electric school bus exhibit file has been uploaded into the Transportation Inventions category of padrak.com/vesperman. Its caption reads: Self-Charged Electric School Bus with Continuous Climate Control Even While Parked. Compressed air-driven vortex tubes are switched between 90% cold air and 10% hot air, or 90% hot air and 10% cold air. Power for the air compressor and electric drive motors provided by one of nine electricity generators. This exhibit was displayed in the September 25, 2021 electric vehicle festival in the Las Vegas Springs Preserve. These nine generators were cherry picked from the Gallery of Clean Energy Inventions. To my knowledge all of these self-charged electric school bus inventions are fully validated. To build a prototype would simply need straightforward sweat engineering, sufficient financing to bring these buses to market, and an organized entity with a will to accomplish this task. The Gallery of Clean Energy Inventions includes 13 more generators that appear to be candidates for powering electric school buses.The neutrinovoltaic generator is profiled on page 60 of the Gallery of Clean Energy Inventions. Massive resources are being employed in Germany to commercialize neutrinovoltaic generator.
65.GV-3 Part 2	Each second 60 billion invisible neutrinos of different energy levels pass unimpeded through a square centimeter of the earth's surface. The left diagram is of a single layer, graphene, of interlocking carbon atoms. A microscopically small percentage of neutrinos transfer their kinetic energies to the carbon atoms. Some of the neutrino kinetic energies self-amplifying resonate with the carbon atoms to vibrate. The vertically vibrating carbon atoms in the diagram are shown as ripples in the graphene. The other diagram shows a layer of vibrating graphene sandwiched between two layers of conductive electrodes. The two electrodes capture the energy of the graphene's alternating concave-convex vertical motions to cause an electrical current to flow. A vibrating sheet of graphene 10 microns by 10 microns in area can produce 10 microwatts of power. 20,000 of these sheets can fit on a pinhead. Photovoltaics can only operate as a single layer exposed to direct sunlight. When stacked bottom layers of neutrinovoltaics equally operate as top layers, even when underground. Neutrinovoltaic generators can power appliances, vehicles, and buildings. Global Wireless Power Transmission Via Zenneck Surface Waves", which is profiled on page 35 of the Gallery of Clean Energy Inventions, has already been built in Texas and is in operation. One-megawatt solar radiant energy generators, profiled on page 31 of the Gallery of Clean Energy Inventions, will be commercially available later this year. To aid your analysis of clean energy inventions attached are the Index to the Gallery of Clean Energy Inventions and list of Clean Energy Inventions. Electric vehicles that haul around a half-ton or so batteries and need to stop for recharging are truly old-fashioned. I am fully confident that once EV owners are freed from the hassle and expense of stopping to recharge, there would be no difficulty selling self-charged EVs. The bottom of padrak.com/vesperman links to my 'grand' inventions development business plan headquartered in Nevada. Development of most, if not all, of these futuristic inventions could soak up a billion dollars. But we would end up with a much better world that people would not recognize.
67.KK-1	The Vegas Industrial Park is ±913 acres located in the northern portion of the Apex Industrial Park in Southern Nevada. The Vegas Industrial Park is planned to bring 10.9 million square feet of industrial space to the area, providing hundreds of jobs to North Las Vegas. The viability of the project relies greatly, if not solely, on the proposed third phase of the planned City of North Las Vegas waterline infrastructure.
68.JK-1	As the Bureau of Land Management (BLM) begins preparation of an Environmental Impact Statement (EIS), the Nevada Department of Wildlife (Department) appreciates the opportunity to provide comments during project scoping. Within the proposed project area, effectively spanning the distance between utility infrastructure from Reno to Las Vegas, we understand approximately 474 miles of 525-kilovolt (kV) and 345-kV overhead electric transmission lines, associated distribution lines, substations, communications sites, and access roads overlapping various wildlife species habitats and important natural resource areas have been proposed. The Department has been coordinating closely with BLM and other project partners as a Cooperating Agency, providing feedback and recommendations on the proposed elements of this project.
68.JK-12	The Department greatly appreciates the opportunity to coordinate with BLM on this project, and to provide scoping comments. We look forward to continued collaboration with BLM, NV Energy, and project cooperators with technical assistance and recommendations. Please do not hesitate to let me know if you have any questions or need additional information.
70.RS-1	Please carefully review my following scoping comments and the attachment, and include them in this NEPA project file.
70.RS-4	As President Biden and Interior Secretary Haaland have accurately warned, the climate and extinction crises are real, connected, getting worse, and require bold and innovative solutions. The management attitudes and methods of the past are largely no longer appropriate or sustainable. These crises pose an existential threat to humanity. This means that serious reforms are urgently needed. These reforms include stopping and then reversing the many downward resource trends in the West.
70.RS-20	Please review the related attachment. Thank you very much for your consideration. *[Included attachment: BLM Necessary Reforms Spotts August 2021.pdf]*
73.KR-1	The Southern Nevada Water Authority (SNWA) appreciates the opportunity to provide scoping comments to the Bureau of Land Management (BLM) for NV Energy's proposed Greenlink West Project. The Greenlink West Project is a system of new transmission lines and associated facilities to be constructed on private, state, and federal lands between northern and southern Nevada.
73.KR-4	We are in support of the project and request close coordination between all parties in order to avoid any conflicts.

CID	General Comments/Statements
74.PG-1	The Nature Conservancy (TNC) is a non-profit conservation organization working nationally and internationally to conserve the lands and waters on which all life depends. TNC has 37 years of conservation experience in Nevada, where our current work focuses on three primary initiatives: resilient lands, resilient waters, and climate action. We thank the Bureau of Land Management (BLM) for hosting multiple rounds of pre-Notice of Intent and subsequent scoping meetings about the proposed Greenlink West transmission line project. This engagement with interested parties, such as TNC, and the public is the foundation of a sound National Environmental Policy Act (NEPA) process. Our comments are based on the information obtained during these meetings and from the project website, as well as our independent objective analysis of the project relative to many natural resource considerations within and adjacent to the project area. We hope the BLM considers our comments when developing the draft environmental impact statement (EIS), including the range of alternatives analyzed in the draft EIS.
74.PG-3	Our comments are meant to help inform a comprehensive NEPA process that fully discloses the potential impacts of the project and leads to a BLM decision that avoids permanent impacts on western Nevada's natural and cultural resources, recreation opportunities, and other important conservation values.
74.PG-4	Smart-from-the-Start Alternatives. TNC strongly supports a smart-from-the-start approach to energy and infrastructure planning. This approach involves siting projects, such as Greenlink West, in areas where it will not compromise conservation values.
77.TA-1	The following comments regarding scope of analysis for the Greenlink West Project Environmental Impact Statement (EIS) and Potential Resource Management Plan (RMP) Amendments proposed actions (Action) align with Department of the Interior (DOI) Nevada Bureau of Land Management (BLM) expected impacts identified within the Federal Register Vol. 87 No. 84; May 2, 2022. Under the National Environmental Policy Act of 1970 (NEPA), BLM is tasked with conducting an EIS to identify significant issues from proposed major Federal Actions that significantly affect the quality of the human environment. Therefore, is it imperative that BLM and cooperating agencies provide integrated review and identify gaps in data and informational needs for a meaningful EIS and any consequential RMP amendments.
78.AV-1	I am the owner of the [*property location*] The front portion has a vacant and flat 2,5 acre space suitable for a lay-down yard for the Green Link Project. Municipal sewer, water and power connections are in place. Also, multiple RV and Motor Home lots are adjacent.
79.JP-1	i went to you planning site but it has no discernable way to put in a public comment on this proposal so i am writing this letter to you mr helseth so you can make it obvious to the americanpublic how they can communicate with you. secondly i note the financial advantage for nevada by putting alltheir crap in nationallands and i have a problem with that. they have continually sought to use national lands as a dump. this plan is a 474 mile invasion of national lands with roads, with logging of immense proportions in our national open space where trees and animals are in extinction status and they seeem to be nothing in the eyes of the blm. blm has always been a vicious agency cutting swaths of earths creatures for human near zero alleged necessities. i note 600 ft right of way to destroy all that lives for construction, 200 ft permanent incursion and invasion which is far tooliberal and disgusting attack on nature.none of those proposals are valid at all.none deserve any consideration. i notice that of l3,000 acresthis profiteer wants to destroy l0,000 of it is nationalland. I HAVE A PROBLEM WITH THAT IMMENSE DESTRUCTINO OF NATURE.ABSOLUTE PROBLMS WITH THAT.
79.JP-3	WE ARE SICK OF THE ANTI NATURE ACTIONS OF CLARK COUNTY WHICH ARE VERY VERY APPARENT.THEY CONSTANTLY CALL FORNATIONAL LAND, WHEN THE STATE OF NEVADA AND TOWNS AN D COUNTIES IN NEVADA CAN BE USED. NEVADA HIGHWAYS CAN BE USED FOR TRANSMISSION LINES. I SEE NO REASON AT ALL TO CONSTANTL INVADENATIONALLANDW, WHIC HSHOULD BE THE HOMES OF TREES AND WILDLIFE, TO BE INVADED FOR THIS PROFITEERR.THIS PROPOSAL IS 1900 THINKING.IT ISNT 1900 ANYMORE IT IT 2022 AND WE CANNOT AND SHOULD NOT ALLOW THIS NVASION ANY MORE. THIS PROPOSAL IS ANTIQUATED THINKING. WE DONT WANT THIS INVASION OF NATURAL LAND ANYMORE.WE WANT NATURAL LAND SAVED. THIS PROPOSAL SUCKS. GO BACK TO THE DRAWING AND PLANNING BOARD. WE NEED2022 THINKING.
80.JCR-1	We are writing to you in regards to the Greenlink West Project and are unable to attend the Environmental Impact Study for public comments on Monday, May 16 but would like to express our concerns.
81.CO-1	The National Park Service (NPS) appreciates the opportunity to provide scoping comments on the Bureau of Land Management's (BLM) Notice of Intent to prepare an Environmental Impact Statement (EIS) under the National Environmental Protection Act (NEPA) on the proposed Greenlink West Project. The project consists of electrical transmission facilities and associated infrastructure located in southwestern Nevada. As stewards of public lands, the NPS protects resources through a variety of internal programs and serves as an active conservation partner with federal and non-federal agencies and organizations. The Greenlink West Project may impact the nationally recognized resources and values of Tule Springs Fossil Beds National Monument (NM), Death Valley National Park (NP), the California National Historic Trail (NHT), and the Pony Express National Historic Trail (NHT).
81.CO-2	The Organic Act of 1916 requires the National Park Service "to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of future generations" (54 U.S.C. 100101(a)). Tule Springs Fossil Beds NM was established in 2014 specifically for the preservation, public education, and scientific study of Ice Age fossils, including the Columbian mammoth, sabertooth cat, American lion, dire wolf, and various species of giant ground sloths, ancient camels and ancient horses. The fossil beds at the park are significant to science and contain some of the richest Ice Age faunas in the Southwest. As a recently established park unit, baseline inventories are being completed for multiple park resources; information on current status is limited. • Death Valley NP, the largest national park in the contiguous United States, is widely known for its scenic views, vast open spaces that stretch toward distant horizons, and overwhelming silence. The park receives upwards of two million visitors a year. • The California NHT commemorates the historic path of travel for over 250,000 emigrants to California during the 1840s and 1850s, while the Pony Express NHT commemorates the path taken by riders to deliver messages from east to west between April 1860 and October 1861. Today, both routes offer opportunities to visit surviving sites and trail segments.
81.CO-17	The NPS appreciates the ongoing coordination with BLM and looks forward to additional opportunities of mutually beneficial participation. Addressing impact topics on NPS lands and NPS-administered sites helps us provide the utmost protection of resources and the visitor experience.

CID	General Comments/Statements
82.TH-1	I have attended a few of the Greenlink meetings, all of which occurred online.Several of these online meetings have been canceled.I'm not aware of any in-person meetings, perhaps a few years ago?I do know there have been no town hall meetings Esmeralda County.Not sure about other counties which will be affected by Greenlink. I had some concerns during the June meeting, which were not addressed, even though other in the chat section had similar concerns. I was told someone from NV Energy would be contacting me to discuss. After waiting several weeks, and feeling very ignored, I wrote (somewhat heated) asking why no one had contacted me. Thankfully a meeting was scheduled.I was told that there would be better outreach to the community and the local government.Its not known if this will actually happen, as the final deadline for comment is this week.So there is no reason for them to follow through. The BLM is clearly in favor of this project and it will happen regardless of what any citizens or local government think. This is a "for profit" project to benefit business and share holders, no one else! This entire process has been a "dog and pony" show and only the minimal has been done let people know, and to receive (and actually consider) public input.
82.TH-3	It is for these reasons I do NOT support the Greenlink project. NV Energy needs to "step up to the plate" and show how this will benefit the communities it affects. The BLM needs to stay neutral and not "bend over for big business". They should be holding in-person public town hall meetings to let people know about this project and allow them to make public comment. NV Energy needs to present how they will help the county and its citizens when this project is being built in their back yards. They need to reach out to and actually work with local government at in-person meeting.

CID	Purpose and Need/Proponent's Goals Comments/Statements
02.AGA-2	AGA owns and controls a significant block of unpatented (and patented) mining claims in Nye County, NV in the vicinity of the Town of Beatty as shown on Figure 1 (see also Section II). AGA has identified several promising gold deposits within our claim block and is actively exploring our claims to further delineate and expand these discoveries. BLM has approved Exploration Plans of Operations (EPOs) and numerous Notices that authorize our exploration drilling projects, as well as EPOs and Notices authorizing other companies' mineral exploration projects in this area. We anticipate submitting a Mine Plan of Operations (MPO) to develop an open-pit mining and mineral processing operation at the North Bullfrog Project later this year. Additionally, AGA has multiple mineral projects at varying stages of exploration and investment in the Beatty area. MPOs for one or more of these projects may ultimately be submitted in the future to BLM. With regard to the Greenlink West Project, Alternative C could significantly interfere with future mineral exploration and mine plans, which would negate the hundreds of millions of dollars that AGA has invested to date in these exploration projects.
04.HG-7	What is the reason for this transmission line? It enables the monopolization of energy by NV Energy. Due to federal energy regulatory commission legislation, the utility companies make more money by spending more money on transmission infrastructure. This power line will enable the wholesale destruction of 250 [inaudible], 230 square miles of undisturbed desert ecosystem.
06.JM-1	I am the external affairs director for the Nature Conservancy of Nevada. We just have a few comments. We appreciate the BLM's efforts to engage with interested parties, such as TNC, early in the process. TNC has three focus areas: Resilient lands, resilient waters, and climate change. And we recognize the primary purpose of the Greenlink West project is to facilitate a transition to carbon-free clean energy, which has positive outcomes for the climate. It's important that the rush to decarbonize the energy sector does not come at the expense of Nevada's lands, waters, or smart-from-the-start approach to energy and infrastructure planning.
06.JM-9	We recognize the importance of the Greenlink West project as the backbone of a decarbonized energy sector. Responding to climate change should balance clean energy with the need to protect the state's important biodiversity and arid landscapes. We look forward to continuing to work with the BLM in pursuit of smart-from-the-start principles and an EIS that fully describes thedirect, indirect, and cumulative impacts of the Greenlink West project.
08.JH-6	If it was just a simple power line from Reno/Las Vegas, it would be a DC line. Because it's 460 miles, and DC is a lot more efficient to transmit longhorn distance. And the penalty for reforming that -- transforming that back into AC is easily taken care of when you've got a line more than 400 miles longhorn. So clearly this line is being designed for lots of interconnections and both take-ons and take-offs.
11.AM-2	In the Draft EIS, clearly identify the underlying purpose and need for the proposed project (40 CFR 1502.13). The purpose of the proposed action is typically the specific objective(s) of the activity and is essential for defining the range of alternatives to be considered for the project. When formulating the need, identify and describe the underlying problem, deficiency, or opportunity that the action is meant to address. Discuss the proposed project in the context of the larger energy market that this project would serve and discuss how the project would assist Nevada in meeting renewable energy portfolio standards and goals, address anticipated electric demand, and improve reliability and resilience of the Western electric grid.
13.KE-7	The Purpose and Need Statement is Artificially Narrow The draft Purpose and Need statement as written is impermissibly narrow and caters only the utility needs, and not broader needs such as public lands and resource conservation or more efficient ways to a sustainable energy future. We request the following language be included in the Purpose and Need Statement: The purpose of the BLM's action is to respond to NV Energy's application for use of BLM-administered lands for the amended right-of-way. Specifically, the BLM authorized officer will decide whether to grant, grant with conditions, or deny the application for an amended right-of-way on BLM lands. Pursuant to 43 CFR 2805.10, if the BLM issues a grant, the BLM decision maker may include terms, conditions, and stipulations determined to be in the public interest on BLM lands. This includes modifying the proposed use or changing the route or location of the facilities on BLM public land.
13.KE-8	In addition, the draft Purpose and Need has changed over time as we attended the various pre-scoping and scoping meetings. Originally, the need for more energy to northern Nevada was emphasized. Later this was de-emphasized. BLM should clearly state that because of the planned closing of the Valmy coal plant which currently provides power to Reno-Sparks, NV Energy is seeking an alternative fossil fuel baseload, which it sees in the multiple natural gas generation stations currently existing in Apex, just north of Las Vegas, NV. The main purpose of the line is to send power north from the Silverhawk and other natural gas power plants to the Tesla Gigafactory, Google and Blockchain servers and Amazon and other warehouse facilities.
13.PG-3	We recognize that NV Energy's primary objectives for constructing the Greenlink West transmission line are to facilitate the transmission of electrical power from new and existing renewable energy generation facilities to demand centers throughout Nevada and the West. As noted in NV Energy's July 30, 2021, Greenlink West Transmission Project Plan of Development, the construction, operation, and maintenance of the transmission line and related facilities are required to achieve the State of Nevada's renewable energy portfolio standard per Senate Bill 358, Nevada's greenhouse gas reduction goals per Senate Bill 254, provide access to renewable energy zones per Assembly Bill 387, and facilitate access for solar energy development. TNC appreciates NV Energy's commitment to achieving these important objectives as they are critical for expanding low and no-carbon energy sources that are needed to address climate change.
16.KE-2	I want to point out on these original meetings, because the power was moving north, it's good to hear it's going to move both south and north. But you were saying that it's going to go to all of the tech factories.
17.LC-1	So I don't think this is a done deal. I completely oppose this power line. It's not going to do anything for Beatty. And Kevin and I have been going to these prescoping meetings for a 15 year or two now, and the purpose and need keeps changing. The original purpose and need was to get natural gas generation at Apex, like the hot natural gas generating station up to Reno/Sparks where the Tesla gigafactory is and all of the Silicon Valley high-tech stuff, because they need more energy.
19.JB-2	The purpose and need for this project are a total fallacy. Nevada politicians, who stand to gain monetarily from the project (specifically Senator Chris Brooks, who wisely resigned before Nevada voters wake up to the snow job he has done by writing and promoting the bill requiring 50% RPS by 2030) and other elected and appointed offici als who have bought into the scheme.
22.KE-12	There is no NEPA happing yet - has BLM already written up a purpose and need statement for the Green Link West EIS?
23.PD-4	The Purpose and Need, as defined, pretty clearly states this project is intended to open up lands for renewable energy development, which seems like the definition of a connected action.

CID	Purpose and Need/Proponent's Goals Comments/Statements
26.PG-1	So we appreciate the BLM's efforts to engage with interested parties such as The Nature Conservancy early in the process. TNC's three focus areas are resilient land, resilient waters, and climate change. We recognize that a primary purpose of the Greenlink West project is to facilitate this transition to carbon free clean energy, which the previous speaker noted as well. But also want to make sure that in the rush to de-carbonize the energy sector, that we're not doing so at the expense of Nevada lands, waters, and biodiversity. TNC strongly supports a smart from the start approach to energy and infrastructure planning. This approach involves siting projects, such as Greenlink West and areas where it will not compromise conservation values. For example, placing the line along existing roadways and transmission lines minimizes new impacts, so we're pleased to hear that the BLM is doing that.
27.KB-15	A.Indirect and cumulative effects of projects, proposed and future, along all 3 powerlines must not be split from the NEPA evaluation of a single powerline route. Each individual decision affects the future of our NV public lands landscapes, wildlife and multiple uses, but without considering the whole, no assessment of the magnitude of cost to NV into the future can accurately be made. Nor can impacts to NV 30x30 climate goals by above proposals be separated from the NEPA consideration of either. The current process is a "cart before the horse" proposition.
27.KB-18	The aggregate of NV BHA concerns: disassociation of the NEPA study of the proposed Greenlink West transmission line from the other 2 trans-NV power lines, one proposed and one in existence, additionally disassociated from the current and projected projects along those lines, 2 of which have not even been through the NEPA process to make an informed siting decision, commits a most grave error in setting the future fate of our NV Public Lands. Essential missing elements: the time to acquire the science-based pivotal information required for deliberative, wise decision-making owed to we the owners of those lands, the wildlife whose lives depend upon them and the multiple use opportunities they provide, inclusive of tourism. In turn, a transparent process should provide to the public all information required to make informed comments. This should include: 1.)Date re indirect & cumulative effects from the 3 transmission lines and associated energy & minerals projects inclusive of existing, proposed and projected. Potential loss to 30x30 aspirational goals must be folded into any final decisions. 2.)Data re the amount of energy NV needs well into the future, how much energy the proposed and existing 3 lines will provide, how much energy will be excess and where does it go. 3.)Data re how much maximum energy could be produced at the sources of where it is consumed (distributed) if all potential sites were utilized (i.e. parking lots, rooftops...). The public deserves to know how much of our public lands need be contributed to large scale projects if all other avenues of production are facilitated, incentivized and built with the same sense of urgency and speed as fast-tracked public land energy related proposals. We fully recognize we need both, while submitting that focus should be on maximizing distributed sources first before dedicating public lands whose current resources are finite and non-replaceable. 4.)Crucially needed is a statewide assessment, conducted by a co-operative state and federal agency process to plan for a NV future that maximizes efficient renewable energy production, while minimizing loss of 30x30 goals, multiple uses, public land resources productivity and wildlife viability into the foreseeable future.
27.KB-9	1) NV BHA supports: a.) A process that includes, at minimum, the evaluation of indirect & cumulative effects of the route itself, the location of sub-stations and the projected related projects already and/or likely to be along the proposed route. We question the irresponsibility, if not legality, of NOT doing so. b.) (As per item A. 5.) A process that simultaneously evaluates indirect & cumulative effects of Greenlink West, North and the existing East line. c.) Potential loss to 30x30 goals be analyzed concurrently. d.) (as per item b above & A.5) Such an analysis would best be conducted within a RMP process, inclusive of wildlife/flyway corridors, prioritized least impactful "opportunity zones", along with incentives to use them and disincentives for development outside such zones. 2) The "cart before the horse" process: We are concerned that many renewable energy & mineral exploration or expansion proposals are being submitted at an increasing rate to both BLM & NDOW along the proposed corridors of both W & N Greenlink before the NEPA process has begun and long before any final route decisions will be made. Developers are posing questions that require cost of the time and energy of NDOW & BLM employees. This presents the grave danger of permanent negative impacts to our public lands before any restrictions related to avoid, minimize, mitigate can be applied to the current Greenlink proposals. This is entirely and dangerously backward. (See section A. 4 & 5 above) Again, 30x30 goals cannot be disassociated from development proposals.
30.MM-1	One of my initial concerns remains that you're building this power corridor, this transmission corridor, or Nevada Energy wants to build this transmission corridor to access 4,000 megawatts of renewable energy somewhere in Nevada. But that doesn't exist yet.
31.SS-4	Is the purpose of Green Link to carry electricity from solar and wind projects on public land?
37.K-3	This line is for industrial power plants, they are not green. It's very misleading.
47.RR-3	Greenlink West is in part a dirty fossil fuel line, greenwashed by solar projects along it! According to the Bureau of Land Management (BLM), the main purpose of the line is to send power north to the Tesla, Google, Blockchain, and Amazon facilities from existing fossil fuel plants and future green energy projects in Nevada as well as 50% of the power generated will be sold to California. We would be damaging Nevada in a myriad of ways just to benefit big businesses and the ever power-hungry California.
55.NS-1	At what point will grid stability be discussed?
58.CVW-1	In our rush to electrify our energy source with government subsidized profits, are we not trading coal mining for lithium, copper and nickel mining? In the name of fighting climate change, which is only a symptom of the ecological destruction of the natural world, are we not just fueling the production of more consumer "goods" in order to continue unsustainable luxury lifestyles? These are questions that must be asked to determine the need for this development.
66.KE-2	You have not written a Purpose and Need Statement yet have you? You can't do that until after scoping.
70.CVW-2	As I see it, the purpose and need is growth. We need this transmission line because there is going to be growth. This is not really about greenhouse gas emissions because if it was, we would be in de-growth mode. This will just add on top of it, so that is the need. We are not just building a transmission line from here to here. That's the way I see it.
70.RS-7	Greenlink West Project is going to hook into the natural gas plants at Apex near the Harry Allen Substation. It is not just for wind and solar energy. Greenlink in part, is a dirty fossil fuel line.
73.KR-3	SNWA understands the purpose of the Greenlink West Project is help NV Energy achieve the State of Nevada Renewable Energy Portfolio and facilitate access to designated renewable energy zones and solar energy developments throughout the state.

CID	Purpose and Need/Proponent's Goals Comments/Statements
74.PG-2	TNC recognizes the Greenlink West transmission line is an important north-south connection in Nevada that provides reliability and capacity for moving electricity between the Reno and Las Vegas metropolitan areas. Greenlink West is also part of a west-wide build out of transmission infrastructure that facilitates the movement of electricity from new and existing renewable energy generation facilities to demand centers throughout the West. The line would contribute to the State of Nevada's renewable energy portfolio standard per Senate Bill 358, Nevada's greenhouse gas reduction goals per Senate Bill 254, and facilitate access for solar energy development. TNC fully acknowledges the line contributes to a carbon-free energy sector, which has positive outcomes for the climate, people, and nature. It is important, however, that the rush to decarbonize does not come at the expense of Nevada's lands, waters, or biodiversity.

CID	Proposed Action Comments/Statements
01.WC-3	At this time, however, AGA has questions/comments about the Greenlink West Project and potential impacts to the AGA projects. More specifically: The BLM Right of Way ("RoW") filing and the alignments shown in the various presentations appear different. The published BLM RoW (serial number NVN 09986301 – accessed 4/1/22) has a different alignment than the alignment discussed in recent BLM presentations (GLWP_Project_Components_Oct2021.kmz). The difference is noted in the attached figure. Has the RoW changed? *[Figure attached]*
06.KE-2	Also on this map are purple "proposed distribution lines" There is one in Amargosa Valley near Mercury. What is the reason for that one? Is it for a specific solar application?
09.AR-5	If NV Energy is proposing to cross the TLRW with its improvements and utilize the existing access roads to construct, operate, and maintain the proposed improvements, an agreement between LADWP and NV Energy shall be required for said use, which shall include the submittal of Civil Engineering plans for LADWP's review and approval. LADWP currently operates and maintains these existing access roads. The agreement needs to be put in place to cover the operation requirements in the TLRW as well as the cost for the future operations and maintenance of the existing access roads.
14.TD-1	I was at the last scoping meeting -- I guess that's what it was -- in here. I'm delighted that you guy have a blue dot on the map now for us and a name for the place. It's not clear whether it's mile marker 41 or 43 and a half, but we can see where there's little low spots in the mountains where you can jump over. That's fine. We're interested in where that substation will go because -- for our planning. Right? Last one of these meetings there was a Matt somebody from -- from New Energy -- New Era Energy, and he wore a sports jacket. I don't know, I don't see him in here. But we would like to -- he would like to know where that substation -- that switching station is going to go. And, yeah, it's 7 miles from the Valley Electric switching station to where your switching station would be, so it's a big deal, them hooking up. And thanks for explaining that one is not the other. So back in, like, '09 or '08, we had three, supposed to be, shovel-ready solar sites that Obama identified. And you kind of explained about them. The population of Las Vegas was declining, and NV Energy wouldn't sign the power purchase agreement, so that all went by the wayside. But it will come back. I've got more, but I'll write a long e-mail.
19.JL-1	You know, when you see a train coming, you can't stop it. You just want to make sure it doesn't run over your toe. And our concern here is your substation. If it ends up on Valley View, that turn onto 95 is dangerous. It took some doing, but NDOT is finally going to give us a turn lane. We don't care if you're on the east side of the road. We don't care if you're on the north side of the highway. But if you're on that northwest -- or that southwest corner, you're going to block the view, whether it's a chain-linked fence or not. It looks like you can see forever there, but you can't. The cars come up and over that curve, and you've got a very short time where they're visible. And we don't need any obstructions there.
19.JL-4	The comment that I do have is the V-shaped towers that they're putting in, they had a serious problem with those on the other side of the state. They put them in, and then the first major wind they had blew down miles of them and caused a bunch of fires. I assume that you're -- we all know what that does -- that they have figured that out hopefully. And if they will use that new thing that they're going to -- that they have done over there over here if they -- if they use those towers.
26.PG-1	So we appreciate the BLM's efforts to engage with interested parties such as The Nature Conservancy early in the process. TNC's three focus areas are resilient land, resilient waters, and climate change. We recognize that a primary purpose of the Greenlink West project is to facilitate this transition to carbon free clean energy, which the previous speaker noted as well. But also want to make sure that in the rush to de-carbonize the energy sector, that we're not doing so at the expense of Nevada lands, waters, and biodiversity. TNC strongly supports a smart from the start approach to energy and infrastructure planning. This approach involves siting projects, such as Greenlink West and areas where it will not compromise conservation values. For example, placing the line along existing roadways and transmission lines minimizes new impacts, so we're pleased to hear that the BLM is doing that.
28.KB-1	I want to say that I fully understand the need for these projects. But what I am concerned -- most concerned about is the whole triangle, you know, all three lines, that they are not being considered together.
28.KH-1	Have the locations of the new substations (Esmeralda and Amargosa) been finalized?
30.KE-2	At the BLM meetings since last June, Greg Helseth and some NV Energy folks were saying that the power from Greenlink West would only be moved north. We were told by BLM that power can't move both ways for a transmission line like that. But at the recent meeting last week, BLM said that the energy will now move both north and south. Can you explain the confusion here? What is the actual story? Will Greenlink West be moving power both ways or just north? Can we get some clarification for the comments by the comment deadline on the 1st?
34.JM-1	Is the proposed line an AC or a DC transmission line?
36.BCC-1	Do you know what is the width and depth of the pads?
37.K-5	Is power coming from Hoover Dam? If so what happens if it can't produce power anymore?
38.NC-1	Does the new Fort Churchill substation have to go right on top of the old one?
41.MR-1	I am a civil engineer working on a large master planned community development project (Talus Valley) abutting the NVEnergy Mira Loma Substation where the Greenlink Transmission Project comes into the south Reno area. Please see below email and attached overall site plan. NVEnergy requested that I forward to you my comments and questions. Please call or email me if you have any additional information. (*Comment included a Talus Valley Site Plan as an attachment.)*
41.MR-2	Thank you for getting back to me. I have reviewed some of the materials in the links you have provided and we will attend the upcoming BLM meeting on 5/19 in Reno. The project we are working on (Talus Valley) is a master planned community abutting the Mira Loma substation (see attached overall site plan). One thing that caught my eye is Construction/Material Yard 1 on Map 1 of the "Greenlink West Transmission Project Plan of Development". The shape of Yard 1 and its proximity to existing roads make it appear to fall directly on Village 23A of the Talus Valley Project. Please let us know if this is intentional or if Yard 1 is intended to be on BLM land just north of Village 23A. Also, please let us know if you foresee any impacts to the Talus Valley project from the Greenlink Project. Feel free to call or email me. We are happy to have a meeting to discuss how these two projects might interact with each other. (Comment includes map showing location of Talus Valley development)
42.RC-2	What will be the total capacity of Greenlink West?
45.B-1	What is the plan when access roads to pole locations cross private property but the pole and line are not on private property?

CID	Proposed Action Comments/Statements
46.RL-1	At the public meeting last week in Reno, the matter of wildlife baseline reports was discussed. The BLM Project Lead indicated the BLM, through their contractor, was conducting wildlife baseline studies along the entire route of Greenlink West. I would be interested in seeing these baseline wildlife surveys. Please send me all the available information on how the surveys were conducted and what the results of the surveys concluded.
50.KE-2	How tall are the microwave towers?
50.KE-5	Also, there is a microwave site proposed near the Longstreet Casino and I would like to know how close it is.
56.HG-4	Is that going through East Walker River State Park, south of Yerington?
56.UNK-1	How big are the substation yards How big are the staging yards--will they disappear after Heard restrictuions about activity around the "poles" Are there lights on the towers re aviation, mil, & civil What's height Water usage during & after The Great Solar Projects - how do they get on the wire Look up NV Energy
57.KD-1	I had questions as to the size of the powerlines.. will this be a huge powerline system such as the Alturas powerline that went through Reno and the North valleys?? If this is the case then my recommendation would be that they be placed close to the current powerlines on Highway 95 since it's already unsightly.. The public thinks Nevada is a trash pit for nuclear waste why not accommodate this opinion.
59.HS-1	As a follow up to our phone conversation, I am sending this email regarding the Garnet Valley Wastewater System. I saw the recent .kmz information that was posted on the Greenlink West website and was wondering if you have any additional information that you can share about the proposed alignment in the Garnet Valley area. I understand that pole locations are yet to determined for Greenlink West as NVE will select the pole type and locations closer to the end of design, but if there is other information that you think would be helpful for coordination, our team would welcome it.
59.UNK-1	I'm a member of the planning committee for the Town of Amargosa Valley. I'm anxious to see where you plan to put the Substation/Switching station in Amargosa valley. I kind of think you are looking at US 95 mile marker 43.
61.LC-2	Can you describe what is involved in constructing Material Yards and what will they be used for? 25 acres is large for areas next to communities.
62.CM-1	I'm interested in seeing a map showing the proposed location for the new Esmeralda Substation.
67.HW-1	I would be interested in receiving updated information, if any, on the Esmeralda Substation as well.
68.MM-2	Following your highway analogy, is there a contingency plan for adding more lanes?
69.TOB-1	Could you show the location of the Amargosa substation?

CID	Alternatives Comments/Statements
01.KE-7	-- another thing is that you've got ranch alternatives up near Beatty. You can cross out the 7J Ranch. I believe you're going to try to move the corridor away from there for environmental reasons.
01.RAM-14	We believe that you, the Nevada Bureau of Land Management, and our elected officials, both State and Federal, have an obligation to act in the best interests of your constituents. You are often the only protection we have when opposed by powerful groups, organizations, and big money. We do not have the means or access these others do, but we have you, the BLM, and our elected representatives who we ask to act on our behalf and to give voice to our concerns. To that end we ask that you select alternative C as the final Beatty preferred alternative and alternative A as the final Scotty's Junction preferred alternative.
01.RAM-2	Several alternative project alignments through the town of Beatty were presented at the public scoping meeting held here on May 17, 2022. The community voiced its support for alternative C, therefore our preferred alignment is alternative C. Alternative C is preferred for the following reasons: it is on public land managed by the Bureau of Land Management, it does not cross private property, and should not impede outdoor recreation activities post construction . As mentioned by the public, it is their priority and wish that the Beatty portion of the Greenlink West Transmission line be constructed on land that is "as close to the NTTR" as possible so as not to impact private property and public land access and use. As you are aware, Beatty is land locked already by the Nevada Test and Training Range to our southeast and Death Valley National Park to our west. Public land use demand s in our area have escalated since the announcement of the Greenlink West Project and it only makes sense for Beatty, the BLM, and the State, to use our land resources wisely and cooper at ively . Keeping critical infr ast ru ct ure close to one of our National Security sit es seems wise to us. Alternatives A and B would be acceptable but not preferred due to their crossing of private land. Alternatives D and E are unacceptable due to the topography, geology, and history of the area they are located in. These alternatives are also very close to the border of Death Valley National Park. The unique geological and historical characteristics of that area are leveraged by the Town, Chamber of Commerce, and others in their eco-tourism advertising. Outdoor recreation is this community's primary source of income. Visitors from around the Nation and Globe come here to experience our unique wide-open rural spaces. A high voltage power line on large towers is not conducive to that environment or the visitor experience. Alternative F is not accept able due to the impact it will have on private land in Beatty. This alternative will impact a greater number of private landowners than alternatives A and B which impact s one private landowner. We believe greater consideration should be given to benefitting the most people and avoiding the most conflicts. Beatty landowners and residents have expressed concerns about view sheds, pretor vectors and other potential environmental impacts to the lands surrounding this alternative. Issues raised by other groups and organizations as justifications for their object ions to alternatives A, B, and C are equally applicable to alternatives D, E, and F. Speaking to the Scotty's Junction alternatives offered during the public scoping meeting held on May 17, 2022, in general we support alternative A. It has the least amount of private land impact, and w e would ask that all private land in that alternative be avoided if that is the wish of the impacted property owner. Alternative B would be acceptable but not preferred due to the visual impact of private landowners located along its footprint. The original proposed action line alignment is problematic for private landowners. Burying the line in some of those areas would be the only acceptable solution for that alternative.
01.WC-4	2.The 'K' alternative posted in presentations during February and March of 2022 passes over the AGA project area and presents concerns on project access as well as exploration advancement and potential mineral development.
02.AGA-3	All of AGA's unpatented mining claims have been properly recorded with BLM as required by Section 314 of the Federal Land Policy and Management Act of 1976 (FLPMA), 30 U.S.C. §§ 1701 et seq., and are maintained in good standing by paying annual Claims Maintenance Fees. Additionally, BLM's Tonopah Field Office has authorized two Plans of Operations and several Notices for AGA's mineral exploration activities pursuant to BLM's surface management regulations at 43 CFR Subpart 3809. As it relates to the Greenlink West Project, BLM is aware of AGA's claim ownership and its active mineral exploration activities, and as such BLM should have advised NVE that Alternative C to the Proposed Action presented in NVE's Plan of Development cannot be located on AGA's claims. As discussed in these scoping comments, AGA believes BLM is compelled by law to avoid impacting our claims, our mineral exploration activities, and our imminent mine development plans. As discussed in detail below, NVE's proposed alignment for the transmission line is located on AGA's mining claims and bisects our Silicon deposit, where we recently announced a maiden mineral resource of gold1. AGA is concerned that construction and long-term operation of this segment of the transmission line could materially interfere with our ability to develop our mining claims and is thus inconsistent with our property rights under the U.S. Mining Law (30 U.S.C. §§ 21a et seq.) as amended by 30 U.S.C. § 612(b).
02.AGA-4	The Proposed Action appears to more or less follow the West-Wide (Section 368) Energy Corridor established pursuant to the Energy Policy Act 2005. Since this corridor was identified, AGA and several other mining and exploration companies have cumulatively invested hundreds of millions of dollars in exploring for minerals in the Beatty area. AGA's large areal extent of mining claims shown in Figure 1 illustrates the area that is being actively explored for minerals by the company, and there are other mining companies operating in the area as well. One of the objectives during the planning process for the West Wide (Section 368) Energy Corridor was to identify and avoid "pinch points," which include areas being used for mining. The April 2022 version of the Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report Regions 1 – 6 defines "pinch points" as follows: The term "pinch points" refers to corridor segments with a considerably reduced capacity for new project infrastructure compared to the rest of the corridor. Examples include reduced corridor width due to challenging terrain or jurisdictional land ownership patterns; existing conflicting surface use activities such as airfields, quarries, or mining in or immediately adjacent to the corridor path; and existing infrastructure such as transmission and distribution lines, pipelines, roads, railroads, power generation facilities, or pipeline booster or compressor stations in the corridor path, which may impede the future placement of new project infrastructure within the corridor. Given the extent of the public lands currently being used for mineral exploration, and the successful discovery of at least several gold deposits that are likely to be developed into gold mines in the next three to ten years, there is clearly a significant pinch point associated with Alternative C to the Proposed Action transmission line segment east of Beatty. In response to BLM's request for alternative transmission line locations to avoid or minimize land use conflicts, AGA is proposing an alternative alignment for the segment of the transmission line located on our mining claims at the Silicon deposit. Our proposed alignment is a modification of Alternative C, which is the alternative that the Town of Beatty is requesting to minimize impacts to the community. As discussed in Section III, AGA's Modified Alternative C would support the Town of Beatty's objectives, minimize impacts to our future mining operations, and thus resolve a problem with the Proposed Action.

CID	Alternatives Comments/Statements
02.AGA-8	Ideally, the ROW should be located entirely off of mining claims to avoid known and future conflicts with mineral exploration and mining uses of these lands. As explained in Section IV, 30 U.S.C. § 612(b) prohibits United States' permittees such as a ROW grantee like NVE from materially interfering with a claim owner's mining and mineral-related activities. To accomplish this purpose, AGA requests BLM relocate Alternative C to be on lands managed by the Department of Defense (DOD), along the public lands-DOD boundary. This location would be consistent with the Town of Beatty's suggestion that placing the ROW on DOD-managed lands would offer the highest degree of protection for the ROW and minimize adverse impacts to the Town. The proposed Modified Alternative C shown in Figure 2 on the following page represents a compromise position in the event the ROW cannot be relocated to DOD-administered lands. Modified Alternative C would locate the proposed ROW(s) further to the east than contemplated by Alternative C. As depicted in yellow on Figure 2, the route would run along the boundary between public lands and DOD's Nellis/Nevada Test and Training Range (NTTR) site. The red line on Figure 2 represents the Proposed Action, and the blue lines represent Alternatives A, B, C, and F. The proposed Modified Alternative C is comprised of two sub-options, also shown in yellow, for alternative locations where the Modified Alternative C transmission line would intersect the red Proposed Action. AGA's Modified Alternative C would minimize the land use conflict presented by Alternative C while addressing the concerns expressed by the Town of Beatty and perhaps by other mining companies in the area.
02.AGA-11	As described in the preceding sections, AGA's mining claims and the current Silicon Project EPO are existing land uses that establish a land use conflict with the Proposed Action. The Silicon MPO, which AGA plans to submit in the future to develop an open-pit and mineral processing operation, will further characterize the extent of the land use conflict. BLM's Greenlink Project West Draft EIS will need to analyze the direct, indirect, and cumulative impacts associated with AGA's Silicon Project EPO and MPO and the Proposed Action. As discussed in Section IV, AGA believes BLM cannot include the Beatty segment of the Proposed Acton in its Preferred Alternative because the resulting land use conflict is inconsistent with AGA's rights under the Mining Law as amended by 30 U.S.C. § 612(b) and FLPMA Section 302(a). AGA thus suggests that BLM's Draft EIS evaluate the currently proposed Beatty segment of the Proposed Action as an "Alternative Considered but Eliminated from Detailed Analysis" because it is inconsistent with governing law. Additionally, the definition of mitigation in the Council on Environmental Quality's (CEQ's) regulations implementing NEPA requires BLM to avoid, minimize, or mitigate impacts associated with proposed actions. The new NEPA regulations at 40 CFR §1508.1(s) define "mitigation" as follows: Mitigation means measures that avoid, minimize, or compensate for effects caused by a proposed action or alternatives as described in an environmental document or record of decision and that have a nexus to those effects. While NEPA requires consideration of mitigation, it does not mandate the form or adoption of any mitigation. Mitigation includes: (1) Avoiding the impact altogether by not taking a certain action or parts of an action. (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (3) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment. (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. (5) Compensating for the impact by replacing or providing substitute resources or environments. AGA believes selecting the Modified Alternative C would be an effective way to avoid the land use impacts that would result in the Beatty area if BLM were to select the Proposed Action as its Preferred Alternative. Selecting the current alignment for the Beatty segment of the Proposed Alternative would require BLM to mitigate, rectify, and reduce the impact and NVE to compensate AGA for the impact.
02.AGA-16	The BLM will consider the relative scarcity of values and availability of alternative means and sites for recognizing those values. AGA's Comments: • BLM must consider the mineral potential of the Beatty Mining District and cannot select a Preferred Alternative for the Greenlink West Project ROW that would interfere with or diminish the mineral resources, and development of those resources, in this district. • The alternative that best recognizes the unique nature and scarcity of mineral deposits4 would be to avoid co-locating the Greenlink West Project transmission line ROW on mining claims as shown in Modified Alternative C (see Figure 2).
02.AGA-22	AGA also agrees with the Town of Beatty's objectives to find an alternative that minimizes negative impacts to the Town, visual resources, and recreation. As discussed in the Beatty Town Advisory Board's (BTAB's) scoping comments, the Town of Beatty supports Alternative C and locating the Greenlink West transmission line ROW on "land that is "as close to the NTTR " as possible so as not to impact private property and public land access and use". The BTAB's letter recommends "Keeping critical infrastructure close to one of our National Security sites" because it "seems wise to us." The BTAB's letter also notes that conflicts with the existing mining claims in the area must be resolved and requests that BLM and NVE communicate and coordinate with area mining companies. Although Alternative C accomplishes some of the Town of Beatty's objectives, AGA believes that placing the Greenlink West transmission line ROW immediately east of the public land-NTTR boundary on DOD-administered lands, or immediately west of the public land-NTTR boundary as shown in Modified Alternative C (Figure 2) achieves more of the Town's objectives including minimizing impacts to mining claims, visual impacts from the Town, and recreation and tourism.
02.SP-1	This letter comes from the Beatty Chamber of Commerce in Beatty, Nevada. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project. The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers inside the town of Beatty and just outside of Springdale and cross the Highway 95 just north of the Bailey's Hot Springs. Beatty has always been a unique little town that bolsters being in the Oasis Valley and has something that most towns in the Desert do not have and that is green lush beauty entering from the North (the Oasis Valley) and South of Beatty due to the Amargosa River. Alternative K would take away that beauty with 250 ft. transmission lines. There is enough BLM land surrounding Beatty that could be used versus running these lines through our town and next to residences.
02.SP-2	The alternative would potentially harm our property values as it would be visually unattractive and the impact to our local view will also degrade our quality of life. The Oasis Valley and Beatty area is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching.
02.SP-8	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values and create health and wildlife risks.

CID	Alternatives Comments/Statements
02-AGA-6	AGA very much appreciates BLM's request for feasible alternatives "to minimize and/or avoid adverse environmental impacts." As explained in the Federal Register Notice of Intent, "…alternatives should resolve a problem with the Proposed Action. In its request for alternatives to the Proposed Action, BLM is asking the public to identify the impacts associated with the Proposed Action so the Draft EIS can analyze these impacts and is requesting information that would assist BLM develop alternatives and analyze resource issues3. AGA looks forward to working with BLM to evaluate AGA's Modified Alternative C. To assist BLM's analysis, AGA can provide geologic information, shapefiles for the footprint of our claim holdings and the suggested corridor for AGA's Modified Alternative C, and other requested information.
03.AS-2	Other location options on non-designated lands should be explored to minimize damage to Nevada's resources while also keeping rate increases to a minimum, which would not be the case if the alignment remains on the monument.
03.JB-1	Basically I'm wondering why every parking lot and every commercial rooftop in Southern Nevada and Reno does not have solar panels. I've seen what's happened to Eldorado Valley, Ivanpah Valley. They're disaster zones. The dust storms are beyond comprehension.
03.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project (see Figure 1. Map below). The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties.
03.KE-2	The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.
03.KE-3	Building a transmission project so close to private residences could create health problems. Electric fields are created by differences in voltage: the higher the voltage, the stronger will be the resultant field. Magnetic fields are created when electric current flows: the greater the current, the stronger the magnetic field. Recent studies have shown an increase in the risk of childhood leukemia from people living close to the electromagnetic field produced by high-voltage transmission projects. The BLM and NV Energy have said they would not build the Greenlink Project near residential areas in North Las Vegas for this very reason. We request the same consideration for our area and communities.
03.KE-7	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, damage tourism potential, hurt the local economy, and create health and wildlife risks. *[Included list of Beatty Residents] [GLWP Alternative K Map Attached]*
04.BTAB-2	Several alternative project alignments through the town of Beatty were presented at the public scoping meeting held here on May 17, 2022. The community voiced its support for alternative C, therefore our preferred alignment is alternative C. Alternative C is preferred for the following reasons: it is on public land managed by the Bureau of Land Management, it does not cross private property, and should not impede outdoor recreation activities post construction . As mentioned by the public, it is their priority and wish that the Beatty portion of the Greenlink West Transmission line be constructed on land that is "as close to the NTTR" as possible so as not to impact private property and public land access and use. As you are aware, Beatty is land locked already by the Nevada Test and Training Range to our southeast and Death Valley National Park to our west. Public land use demand s in our area have escalated since the announcement of the Greenlink West Project and it only makes sense for Beatty, the BLM, and the State, to use our land resources wisely and cooperatively. Keeping critical infrastucture close to one of our National Security sites seems wise to us. Alternatives A and B would be acceptable but not preferred due to their crossing of private land. Alternatives D and E are unacceptable due to the topography, geology, and history of the area they are located in. These alternatives are also very close to the border of Death Valley National Park. The unique geological and historical characteristics of that area are leveraged by the Town, Chamber of Commerce, and others in their eco-tourism advertising. Outdoor recreation is this community's primary source of income. Visitors from around the Nation and Globe come here to experience our unique wide-open rural spaces. A high voltage power line on large towers is not conducive to that environment or the visitor experience. Alternative F is not accept able due to the impact it will have on private land in Beatty. This alternative will impact a greater number of private landowners than alternatives A and B which impact s one private landowner. We believe greater consideration should be given to benefitting the most people and avoiding the most conflicts. Beatty landowners and residents have expressed concerns about view sheds, pretor vectors and other potential environmental impacts to the lands surrounding this alternative. Issues raised by other groups and organizations as justifications for their object ions to alternatives A, B, and C are equally applicable to alternatives D, E, and F. Speaking to the Scotty's Junction alternatives offered during the public scoping meeting held on May 17, 2022, in general we support alternative A. It has the least amount of private land impact, and w e would ask that all private land in that alternative be avoided if that is the wish of the impacted property owner. Alternative B would be acceptable but not preferred due to the visual impact of private landowners located along its footprint. The original proposed action line alignment is problematic for private landowners. Burying the line in some of those areas would be the only acceptable solution for that alternative.
04.BTAB-14	We believe that you, the Nevada Bureau of Land Management, and our elected officials, both State and Federal, have an obligation to act in the best interests of your constituents. You are often the only protection we have when opposed by powerful groups, organizations, and big money. We do not have the means or access these others do, but we have you, the BLM, and our elected representatives who we ask to act on our behalf and to give voice to our concerns. To that end we, the Beatty Town Advisory Board, ask that you select alternative C as the final Beatty preferred alternative and alternative A as the final Scotty's Junction preferred alternative.
04.HG-8	The last time I looked at Google Earth, only a small portion of the Tesla facility rooftop was covered with solar panels. The industrial park comprises almost 4,000 acres of rooftops, parking lot, and disturbed area. Until they cover their own area with solar panels, don't tear up one acre of pristine desert.
05.CD-3	The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
05.SS-2	So I've been doing some research into the parking lots that we have in the United States. And a very conservative estimate is that the United States has two and a half million acres of parking lots. Today in Las Vegas, I've been parked in four different parking lots, including the parking lot here at Centennial Hills High School. And, you know, as most of you probably know, our parking lots in Southern Nevada are pretty much wastelands. There's practically no shade, and they're really bad to be in. So if we built solar shade canopies over even half the parking lots in the United States, that would be more than enough acres to produce the energy that they're talking about with this and other projects.

CID	Alternatives Comments/Statements
06.JM-2	This approach involves siting projects, such as Greenlink West, in areas where it will not compromise conservation values. For example, placing the line along existing roadwaysand transmission lines minimizes new impacts. We strongly encourage the BLM and NV Energy to pursue an alternative that has all route segments directly paralleling existing linear disturbances.
06.JM-6	With respect to Tule Springs Fossil Beds National Monument, TNC supports an alternative that would avoid constructing additional infrastructure through or in the Tule Springs Fossil Beds National Monument.
06.JM-7	With respect to the Oasis Valley, we recognize this is a challenging area, given the proximity to Death Valley National Park, the Nevada Test and Training Range, and the town of Beatty. TNC has analyzed possible alignments in the area and suggests an alignment that has the least potential for additional habitat fragmentation.
07.CB-1	I too am concerned about I-11. And it would seem to me that you would want to avoid being right next to the highway. Most of what I've read on I-11 is that they want to widen 95, so I think that's a valid question about looking at I-11.
07.KE-1	I see there are no new KMZ files available for the new Alternative K in Oasis Valley for the Greenlink West Project. Greenlink West Project | Bureau of Land Management (blm.gov) *[https://www.blm.gov/greenlink-west-and-greenlink-north]* Since this alternative will impact private landowners, and you are putting the EIS out on April 1st, you need to put that alternative map out there now rather than later. Can you send me the KMZ file for Alternative K? We think it will cross 3 private properties, but the maps you showed are not clear.
08.DS-2	As I mentioned, I am working with Anglogold Ashanti. The Company controls numerous unpatented mining claims in the Beatty area that conflict with the proposed alignment of the Greenlink West transmission line. Constructing a transmission line along this alignment would substantially interfere with the development of AGA's Silicon Gold Project.
08.KE-1	In this document dated January 17th, the Logan Simpson contractor said that the Alternatives around 7-J Ranch have been eliminated, but after this in February, it appeared that you were still considering 3 of those alternatives including in addition to the new Alternative K "Hi, I have attached the working draft of Chapter 2 of the GLWP EIS for your review and comments. After receiving additional input from the Air Force earlier this month, the three Beatty/7J Ranch alternatives around the 7J Ranch are now being eliminated from further consideration; other alternatives for this portion of the transmission route are currently being developed. " Question: Are the 3 alternatives near 7-J Ranch still being considered or not? *[Attached email between Logan Simpson and Cooperating Agencies]*
09.LO-3	203 miles square should be taken from our parking lots and our large industrial buildings. I am asking you to ask NV Energy to do that. It's already out there ready to go. Wouldn't you love to park under shade? That's the only way we're going to get it. A 6-by-6 diamond will never get it in this town. With dust storms increasing, habitat destruction increasing, BLM must work to find already destroyed areas of Nevada to place the solar and let NV Energy do their job on rooftop and parking lot solar. We are waiting.
10.ELR-4	We note that a federal appellate court has previously ruled that in an EIS, a federal agency must evaluate a reasonable range of alternatives to the project including other sites, and must give adequate consideration to the public's needs and objectives in balancing ecological protection with the purpose of the proposed project, along with adequately addressing the proposed project's impacts on the desert's sensitive ecological system [National Parks & Conservation Association v. Bureau of Land Management, Ninth Cir. Dkt Nos. 05-56814 et seq. (11/10/09)]. Therefore, the Council requests that the BLM develop and analyze other viable alternatives, which we believe constitute "other reasonable courses of actions" (40 CFR 1508.25). Other viable alternatives should include at least one environmentally preferred alternative that avoids and substantially reduces impacts to biological resources and thus provides a greater level of ecological protection especially for the threatened Mojave desert tortoise and its habitat, including linkage habitat needed for survival and recovery (see Averill-Murray et al. 2013, 2021). For example, one alternative analyzed in the DEIS would be a route that follows and is located immediately adjacent to existing major highways.
11.AM-3	Alternatives Analysis. The U.S. Environmental Protection Agency recommends that the Bureau of Land Management evaluate all reasonable alternatives that fulfill the project's purpose and need. Reasonable alternatives could include, but are not necessarily limited to, alternative routes for transmission and distribution lines, as well as alternative locations for substations and other types of transmission infrastructure. We support efforts to identify and select alternatives that avoid, minimize, and/or otherwise mitigate environmental impacts. In the alternatives analysis, describe the approach used to identify environmentally sensitive areas and the process used to designate them in terms of sensitivity. Wherever possible, we recommend that BLM utilize existing transportation or transmission corridors in lieu of undisturbed land. We recommend the Draft EIS present the environmental impacts of the proposed action and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public (40 CFR 1502.14 (b)). Describe how each alternative was developed, how it addresses project objectives, and how it would be implemented. Quantify the potential environmental impacts of each alternative to the greatest extent (e.g., acres of habitat impacted; change in water quality) and clearly delineate differences in impacts as well as associated benefits between alternatives analyzed. Further, discuss reasons for eliminating alternatives to the proposed action (40 CFR 1502.14 (a)). <u>Tule Springs Fossil Beds National Monument Alternative</u>. The EPA encourages the BLM to work directly with the National Park Service to identify an alternative alignment that avoids direct impacts to Tule Springs Fossil Beds National Monument (TUSK). We understand that there is an existing transmission corridor – Renewable Energy Transmission Corridor (RETC) – along Moccasin Drive adjacent to TUSK that, if used, would eliminate the need to build structures and disturb ground within TUSK. Discuss the feasibility of utilizing the RETC (corridor sharing) in the Draft EIS, thereby avoiding direct impacts to TUSK. <u>Mason Valley Wildlife Management Area Alternative</u>. We encourage the BLM to continue to work with the Nevada Department of Wildlife to identify an alternative that minimizes impacts to the Mason Valley Wildlife Management Area. In the Draft EIS, fully consider and discuss the options that NDOW has presented, as well as their feasibility.
11.JM-3	We believe there are alternative routes for the Greenlink transmission line through Oasis Valley, alternatives that avoid the destruction of our nature preserve and save the costly delays that occur from the project being sited there. We would like to discuss alternatives with you and with NV Energy. To that end, I look forward to receiving Lee Simkins contact info from you.
12.MD-1	My first comment -- by the way, caretaker, Bailey's Hot Springs. My first comment is on Alternative F or K, or whatever we're calling it this week, terrible idea. I mean,they're all terrible ideas to somebody.
13.DS-4	That's to move it as close as we can to the existing bombing and gunning ranges out there. The alternative you have for K that takes you through Crater Flats puts it right on top of one of the mining resources. You need to relook at that and kick that over as far as we can to that site. That might make a tight spot above the Old Cooper Ranch and the 7J Ranch today and the effect that it's close to that.

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13.KE-40	The National Environmental Policy Act directs the BLM to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources;…" (NEPA Sec102(2)(E)) https://www.transmissionhub.com/articles/2012/10/nevada-puc-staff-recommends-cost-of-mitigation-issues-with-on-line-not-be-passed-on-to-customers.html Please reject Alternative K or now F for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, and potentially create health and wildlife risks.
13.KE-41 Part 1	These Greenlink West smaller alternative adjustments should be analyzed: 1. Smaller voltage line, to fit into the existing corridor. Please review an alternative that builds a 345 kV line instead of a 525 kV. This would reduce the size of the line and limit the amount of environmentally intrusive solar applications being submitted. 2. Split the line into two 230 kV or 345 kV lines in order to bury the line through sensitive areas and rejoin as a 525 kV later. 3. No fossil fuel alternative: Alternative ending at an alternative substation instead of at the Harry Allen Substation ending at natural gas generating facilities. 4. Halfway Alternative ending at an Esmeralda Substation. Reason: to protect viewsheds in the Beatty and Tule Springs areas. 5. Please consider an alternative that only builds a more efficient DC Line. 6. Conservation Plan Amendment Alternative: create ACECs for sage-grouse, archaeology on Sarcobatus Flat, buffer around Tule Springs. 7. Review an alternative that reduces the overall numbers of microwave towers for the project. 8. Review an alternative that only develops the 350 miles of transmission and not the high-tech microwave infrastructure (460 miles). 9. Review an alternative that shortens the Greenlink West line. Take about 70 miles off the line from the south. 10. Review an alternative that reduces the number and length of access roads. 11. Review an alternative that avoids the Tule Springs Fossil Beds National Monument. 12. Review an alternative that will not hook the Greenlink West line up to the Apex Natural Gas Plants. This would be analyzed as a non-fossil-fuel transmission line alternative. 13. Review an alternative that sites a material yard away from Cactus Springs and the wetlands. The scrape will cause dust and be a visual eyesore. 14. Review an alternative that moves the microwave site away from the Longstreet Casino. (The property owners are not aware of the microwave tower). 15. Review an alternative that move the Amargosa Substation about 10 to 15 miles south to help avoid the solar land rush in the viewshed of Beatty. 16. Review an alternative that does not develop an unsightly 25-acre maintenance yard next to Beatty, with high truck traffic impacts. 17. Review an alternative that buries the line within the viewshed of the Nature Conservancy 7J Ranch in Oasis Valley. This would be for about 15 to 20 miles. 18. Review an alternative that avoids the Pronghorn antelope fawning habitat in Sarcobatus Flat. 19. Review an alternative that buries the line 5 miles south and 5 miles north of Scotty's Junction. The line will be very visible from there. 20. Review an alternative that sites a microwave tower closer to Highway 95 and not on remote Gold Mountain. Site is full of archeology and very unspoiled.
13.KE-41 Part 2	21. Review an alternative that does not develop an unsightly 25-acre maintenance yard in the historic community of Goldfield. 22. Review an alternative that buries the line along the entire eastern shore of Walker Lake. If there are too many impacts associated with that, review an alternative that move the line about 5 miles east. 23. Review an alternative that avoids the two Bi-State sage grouse mapped habitat units the line would be built though over the Wassuk Range. 24. Review an alternative that avoids following the Walker River to protect scenery and raptors. 25. Review an alternative that either avoids the Mason Valley Wildlife Management Area or buries the line next to the Mason Valley Wildlife Management Area. 26. Base a No Action Alternative on the potential to build solar plants and power sources closer to the point of use for Tesla, Google and Blockchain. 27. Review alternatives that do not cause growth-inducing impacts associated with opening up wildlands with new high-voltage transmission infrastructure in remote parts of the state. 28. Review an alternative that re-engineers the Valmy coal power plant east of Reno-Sparks into a modern high-efficiency combined cycle natural gas plant with Carbon capture, and with the potential to be a hybrid solar thermal power plant.

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13.KE-42	Base a No Action Alternative on Distributed Generation: Instead of the need for growing northern Nevada to extract natural gas generation from southern Nevada with a long, inefficient, and very costly high-voltage transmission project, a serious alternative should be looked at where renewable energy is generated locally in order to fulfill the need for industrial high-tech facilities in Reno-Sparks to gain truly clean energy, not associated with Apex natural gas power plants at the other end of the state. This would eliminate the NEED for the Greenlink West Project and justify a No Action Alternative. Microgrids, rooftop solar systems, parking lot solar canopies, and distributed solar energy storage should be analyzed, close to the load centers where the energy is most needed. Rooftop solar reduces costs for all ratepayers. This saves everyone money, but also cuts utility profits. That's what this is all about. • In 2018 alone, rooftop solar and energy efficiency prompted the state of California to scale back more than 20 power line projects, saving $2.6 billion. • Maximizing rooftop solar could save American households nearly $500 billion over the next thirty years, while doubling down on our overreliance on long-distance power lines could cost Americans $350 billion.8 • Reducing grid costs cut against utility profits, even if it saves all ratepayers. As the CPUC recently outlined, "IOUs are inherently incentivized to make investments to drive an increase in their rate base and therefore, their profitability."9 Stresses to the grid under management of the California Independent System Operator (CAISO) in recent years shines a light on the value of Distributed Energy Resources (DERs). Rolling blackouts across California caused by an August heatwave caused the California Public Utilities Commission (CPUC) on November 19, 2020, to vote unanimously for rulemaking that would increase capacity on the energy grid by 202110, and discussion included the need for more DERs.11 Large-scale solar projects connected to long high-voltage transmission infrastructure were less productive, in part due to cloud cover. The August heat storm hit across the western states, so interstate grid energy imports failed. Unexpected shifts in residential peak occurred due to stay-at-home orders during the COVID-19 pandemic, as well as heat waves continuing into the evening hours, which hampered CAISO's scheduling of forecast energy supply. It was the perfect storm. Climate Change may only increase such heat storms, and DERs are well-positioned to give value and reliability to the grid. Net Energy Metering solar + storage units could be fairly compensated to discharge their excess capacity and export to the grid in order to reduce load when needed. DERs should enjoy a value boost compared to non-resilient energy systems—long, high-voltage transmission lines, utility-scale solar projects, and most natural gas power plants. The Department of Energy has developed methodologies for valuing the resiliency of DERs and microgrids, and the value of flexibility in dealing with increasing levels of intermittent renewable energy. Microgrids are critical and give ancillary services to the grid.
13.PG-11	All options, including undergrounding and additional route alternatives beyond what has been proposed, should be on the table for this area.
13.PG-12	In the Weepah Hills, Walker Lake, and Yerington areas, we encourage the BLM to explore alternatives that would co-locate the line with existing infrastructure. This would avoid habitat fragmentation in areas that are currently free from any similar features. TNC would be happy to work with the BLM to help identify the least impact alternatives in all these locations.
13.PG-5	We ask that the BLM evaluate a range of alternatives that would avoid, minimize, and mitigate specific environmental impacts; fully disclose the project's direct, indirect, and cumulative impacts in the EIS; and work collaboratively within the agency to integrate this project with broader planning-level initiatives.
13.PG-6	To minimize direct impacts from the line and associated project features, TNC urges the BLM and NV Energy to use a smart from the start approach. A hallmark of this approach is to locate new project features in areas that have already been disturbed or are planned for future disturbance. Where it is not feasible to locate project elements in previously disturbed areas, we urge the BLM and NV Energy to prioritize areas with the relatively lowest conservation values. While most of the proposed alignment parallels Highway 95 or other existing linear features, there are portions that do not.
13.PG-8	We strongly encourage the BLM and NV Energy to analyze alternatives that have all route segments directly paralleling existing linear disturbances.
13.PG-9	Following our initial assessment, five areas along the proposed route are of particular concern: Tule Springs Fossil Beds National Monument, Beatty and Oasis Valley area, Weepah Hills, Walker Lake, and Yerington. We appreciate the BLM's efforts thus far to explore a range of alternatives in the Beatty area. We recognize this area is heavily constrained with the Department of Defense land to the east and National Park Service land to the west.
14.CH-11	HTI/NA TC also operates on privately-owned land that would be directly affected by the proposed action route. HTI/NATC operates on one parcel owned by HTI (015-511-01) along the Carson River and two parcels owned BAH, closer to the Fmt Churchill Substation (014-051-01 and 014-081-01). Due to the stringent security measures imposed upon HTI/NATC in its private, State, and Federal contracts, the proposed action route through these privately-owned parcels is unacceptable and impermissible. Indeed, some DoD contracts require HTI/NATC to maintain access and perform tracking of personnel in and out of its premises. Some contracts are sight sensitive in nature and for these reasons, a typical right-of-way cannot be agreed upon. Roads identified for access to suppmt the installation of the power lines within the HTI/NATC prope1ty are used exclusively for 7 day per week, 24 hours per day test operations. Again, these circumstances apply to all three parcels that HTI and BAH own, as HTI/NA TC testing occurs in each location. In addition to the security and sight sensitivity concerns, in the proposed action route there would be three powerlines crossing parcel O 15-511-01. HTI/NATC conducts a variety of DoD ballistic testing, blast events, and weapons tests in these areas utilizing well established, approved and instrumented ranges. This activity provided life-saving technology to Soldiers and Marines throughout the conflicts in Iraq and Afghanistan. The methodologies developed by HTI/NATC for survivability evaluations are unique and exclusive to the specific areas currently identified for installation of the powerlines. The powerlines must not cross the areas as indicated in the proposed action due to these types of critical and life-saving testing activities. BLM and Logan-Simpson must also consider that the Naval Air Station Fallon does numerous militmy training flights in the exact location above the Carson River where the proposed action route is located. Recreation planes and paramotors are also witnessed in the area of the Carson River where the powerlines would be installed. Although not necessarily their issue, HTI and BAH encourage BLM and Logan-Simpson to investigate the negative affects the powerlines would have on the air access in and around the Carson River.

CID	Alternatives Comments/Statements
14.CH-17 Part 1	HTI and BAH recognize the need for the GL WP as well as alternative energy expansion in Nevada. Based upon the foregoing, HTI/BAH would specifically suggest one of the alternative routes, with preference in the following order: Our first preferred alternative is shown on map 2 and map 3 from the Greenlink West Geotechnical Investigation DOI-BLM0NV-000-2022-0003-CX, dated December 2021 , copies of which are included herein as Figures 1 and 2, respectively. The route outlined in this alternative is a pa1t of an already existing transmission line, as well as being much easier and faster to access than the proposed action route, from HTI/NA TC' s experience on all of the access roads in both areas. This alternate route will also mitigate most of the negative consequences to wildlife, aircraft and ground vehicle recreation, and all of HTI/NATC's operations within the road network for the proposed action, as outlined throughout this comment. Additionally, this alternative route will only cross the Carson River in one location, rather than three. Lastly, when approaching and crossing U.S. Highway 50, this alternative travels through more BLM and industrial areas in the Moundhouse area, where it is more likely the addition of transmission lines will not affect the existing operations. Should the alternative shown in Figures 1 and 2 be untenable, HTI and BAH suggest a combination of proposed alternatives 'Blue P' and 'Blue N' of the Mason Valley WMA Alternatives that were announced in public meetings lead by the BLM (reference Figure 3 and Figure 5, respectively). The only additional detail to add to alternatives 'Blue P' and 'Blue N' would be how to connect them in a way that makes sense for all stakeholders including the Mason Valley Wildlife Management Area and the Walker River Paiute Indian Reservation. There are a few ways to connect 'Blue P' and 'Blue N' alternatives that HTI urges BLM and NV Energy to evaluate. In Figure 5, the 'Added "Pink" Route' option highlights just one option for connecting 'Blue P' and 'Blue N' alternatives. This route option would still avoid the Mason Valley Wildlife Management Area and only minimally cross one private entity and the Walker River Paiute Indian Reservation. Similar to the most-favorited alternative route outlined above, this alternative is much easier and faster to access than the proposed action route. This alternate route will also mitigate much of the negative consequences to wildlife, aircraft and ground vehicle recreation, and all of HTI/NATC's operations within the road network for the proposed action. Lastly, this alternative route will not cross the Carson River, and very minimally cross over Lahontan State Recreation Area.
14.CH-17 Part 2	Another alternative that was not proposed formally at the BLM public meetings, but HTI insists BLM and Logan Simpson analyze as a possible solution is from the Fort Churchill Substation, the route would focus the three 345 kV lines and run alongside Highway 95A nmth until it intersects directly with U.S. Highway 50 and runs the last pait of alternative 'Blue N' until it meets with the proposed action route again. This 'Hwy 95A' Route alternative is shown in Figure 6 below. This seems like a viable route option because it avoids the Mason Valley Wildlife Management Area and the Walker River Paiute Indian Reservation. This route would also run alongside a highway, therefore the access to the transmission lines is very straightforward, and cause minimal new disturbance to wildlife and recreation activities. As there is private land that would be affected by this alternative located alongside Highway 95A once n01th of the Carson River, there may be many possible different routes in order to stay on more BLM-administered land between the Carson River and U.S. Highway 50.
14.CH-3	As explained within this response, the proposed route for the GL WP would adversely impact/prevent HTI/NATC from complying with DoD requirements.
14.CH-4	HTI and BAH each own significant real prope1ty within the proposed action route of the GL WP. HTI also holds BLM issued and renewed Land Use Permit N-66753, which would be adversely affected by the proposed action route. HTI also holds two BLM grazing allotments which allow HTI to sustain a cattle operation on its prope1ty as well. To that end, HTI and BAH would incur significant adverse business, environmental, and individual impacts if the currently proposed action route is approved. Please understand that HTI and BAH are not expressing opposition to the GL WP; rather, this public comment is offered in hopes of the selection of one of the alternative action routes.
15.CL-3	To get through this area , the Greenlink transmission line will be crowded into a narrow strip between the Nellis range / test site and the Death Valley national monument. I don't see it being able to go anywhere else.Maybe it could go around the east side of the test site..plenty of sun over there..and open un loved land...sell that to the greenlink people..as a plus..plenty of sun over there.
15.JL-1	I just have a couple of comments. One is I'm not in favor of the power line going through the 7J. And I don't know what designation you have it at this moment, but the one that goes around it would be the best. And without a whole lot of problem, I could see that going around. And I agree with David, Mr. Spicer, that we have a lot of mining and things going on. If you can get it as close to the test site -- I'm sorry -- Nevada Nuclear -- Nevada National Security Site, it would be better, because that's all going to be off -- you can't get in from one side or the other. Excuse me. And I'm not going to touch this, so the lady doesn't have to come and clean this. I had three things, and I said two. I guess the other one didn't make any difference.
16.JB-3	As you know, the GWTP would be built inside of the Tule Springs Fossil Beds National Monument. It has many destructive elements. GWTP would seriously threaten Ice Age fossils and visual resources. The application's preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground – this would damage fossils in the area. However, NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
17.RR-1	The only acceptable alternative for the location of this proposed transmission line is one that completely avoids all incursions into the Tule Springs Fossil Beds National Monument. Stay out of the Monument!!
18.KO-1	He would like the alternative that pushes the Greenlink right between the Nevada Test and Training Range and the 7J, as far to the NTTR as possible, because that's -- that affects the least amount of people in Beatty.
19.JL-3	So on the -- on the substation, you would want to see it more across the other side of the freeway. I'd prefer it on the other side of the freeway, but that's Harry Reid's property, so I don't know if you'll get it over there.
20.LC-3	This Green 'I' alternative would have gush impacts to people in the Town of Beatty.
20.LC-4	Huge impacts to the ghost town of Rhyolite. The last alternative you referred to, important BLM historical site.
21.JGL-2	Alternative C is preferred because it is on public land managed by the BLM, it does not cross private property, and should not impede outdoor recreation activities after construction. It is our wish that the Beatty portion of the Greenlink West Transmission Line be constructed on land that is as close to the Nevada Test and Training Range as possible so as to not impact private property, mining operations, and public land access and use.
21.JGL-4	The proposed Beatty Material Yard 5 on twenty-five acres of land is on a parcel that includes the Beatty General Improvement District driving range and a portion of the Beatty Cemetery along the Highway U.S.-95 frontage. We are opposed to this due to its proximity to the Beatty High School, which is across the street. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing.

CID	Alternatives Comments/Statements
21.JGL-8	We are not against the construction of the Greenlink West Project, but we ask that you select Beatty Alternative C as the final preferred alternative.
22.EG.-2	I also -- and this is -- person speaking right now. I also think that the original route that was proposed was the best route, the least impactful to the community and to the area, both to the test and training range, the security, like somebody else has already said. And I do think that it's really, really important that if you're going to go over or close to or whatever to somebody's land, whether it's part of this process or it hasn't been, that you should make it a part of that process. That should be the most important thing,is go to the people that you're affecting. So, anyway, I have a lot more I would like to say. But, you know, I'm really proud of the community for coming out and writing their letters, sending their comments in. Good job, Beatty.
22.KE-10	I want to also mention some other things you said, that it can't be buried, but there are some articles and evidence of some areas where 500-kV lines have been buried and we don't see that as an alternative and certainly are not going to ask for 100% burial alternative, that's not plausible but there are certain areas where that could alleviate certain visual impacts, and I don't see you talking about that.
22.KE-2	Is there no alternative outside of NPS land (at TUSK)?
22.KE-3	But you still must consider the No Action Alternative.
22.KE-4	So does TNC not own the space above the ranch? So they have no choice in that?
22.KE-5	How does NPS feel about the line next to the park?
22.KE-6	Have you discussed that alternative with the Timbisha Shoshone?
23.NS-5	And I think that kind of pretty much covers what I have. And the one thing I thought that was nice -- I don't know if this is proper to put in or not -- is I thought that in places where people live, it might be good, even though it's more expensive, to bury the power lines.
23.PD-2	There should be more than one Bullfrog Hills alternative. There are several possible routes in the Bullfrog Hills.
24.DB-1	Before we get too far north, do you have slides on alternatives east of Lamb Blvd., up into the Apex area?
24.DB-2	Earlier, I was referencing the beginning of the line - between Harry Allen and where you started the first slide, near Losee Rd. I was curious if you had slides of alternatives along that stretch.
24.JM-2	We also shared some thoughts on proposed alignment, and I'm here tonight to talk about the proposed alignment around the Tonopah area and some thoughts we have on that. On April 20, 2022, the Bureau of Land Management, U.S. Forest Service, and U.S. Department of Energy released their Section 368 Energy Corridor Review Final Report. The report includes the review of all West-Wide energy corridors, summarizes the regional review reports, and includes updated recommendations after consideration of tribal and stakeholder comments. The report included recommendations for changes to the corridors in Section 18-224, which is the section of transmission that extends between Carson City and Las Vegas. I will read those recommendations now. Quote, consider shifting corridor east at milepost 106, following Highway 95 past Tonopah and Goldfield, and rejoining the corridor at milepost 165 to provide access to the Miller solar energy zone. Alternatively, consider shifting the corridor east at milepost 85 along existing transmission line to Highway 95 and south past Tonopah and Goldfield to provide access to Miller SEZ. During land use planning, consider the proposed Greenlink West transmission line project route and proposed Interstate 11 project route as a preferred pathway for future energy infrastructure. That was their description of their recommendation. The rationale is the next thing that I will read for that recommendation. Quote, the recommended revisions would collocate with existing infrastructure and provide access to the Miller SEZ, facilitating solar energy development. If any proposed infrastructure -- Greenlink West transmission line project group or proposed I-11 project route -- is approved and constructed in the future, the ROW -- the right-of-way -- for the new infrastructure would become a preferred route for energy transport, and the BLM and the United States Forest Service should consider revising thecorridor to align with that ROW, end quote. The Nature Conservancy recommends that the transmission line connect with the Miller SEZ west of Tonopah. The current alignment through the Weepah Hills southwest of Tonopah does not provide this important connection. Additionally, the proposed alignment would result in a new linear disturbance and increased habitat fragmentation. As part of the NEPA process, we ask that BLM consider additional alternative alignments as recommended in this Section 368 Energy Corridor Review Report.
26.PG-2	We strongly encourage the BLM and NV Energy to pursue an alternative that has all route segments directly paralleling existing linear disturbances. In terms of the proposed alignment, we provided comments at some of the previous meetings this week.
27.B-13	No portion of the proposed route should go through the Tule Springs Fossil Beds National Monument
27.KB-10	Proposed route specific concerns: 1) Mason Valley & Terminus at Ft. Churchill: a.) Should entirely avoid the Mason Valley Wildlife Management Area b.) Keep open a terminus location alternative that could facilitate a potential HWY 80 alternative to HWY 50 Greenlink North proposal. c.) Should entirely avoid any proximity to or visual impact to the Walker River State Recreation Area.
27.KB-11	Beatty and Oasis Valley - Any route through this area must not veer from existing rights of way and/or transmission lines. The proximity to the town of Beatty and Death Valley National Park is a recipe for major visual and route impacts to tourism and recreation from which both the town and our state derives great benefits.
27.KB-17	Loss of undisturbed public land cannot be recreated, therefore mitigation is not a solution. As impact solution tools: Avoidance must be primary; when impossible, minimization is second.
27.KB-3	The only strategy we can foresee to avoid permanent major impacts to NV public land and resources, dramatically changing our landscapes into the foreseeable future, must be a process in which a science-based site-specific & statewide evaluation of the indirect & cumulative effects of both the conservation and development components are considered concurrently. A logical way to achieve this could be through the statewide Management Plan Revision (RMP) process. Such a deliberative inclusive process would guide the wisest decisions in prioritizing site-specific locations for both the 30x30 goal and the energy, minerals and transmission goals, laying the essential map for win/win maximum cost/benefit actions. Along with both Greenlink West & North, an analysis of the existing Eastern NV route (see 1.b below) must be folded into such a NEPA study to address the reality that what is being considered is nothing less than the fate of the landscape, wildlife, cultural and historical resources and multiple uses of our entire state for the foreseeable future.
27.KB-6	The proposed alternative should demonstrate a focus has been made to avoid or at very least minimize impacts to above B.2. a,b,c,d concerns. To do so: a.) Would include a key adherence to siting sub-stations far from potential impacts posed by any of the 4 major concerns above. b.) All routes must be along existing corridors. No route should be sited through previously unfragmented public lands. c.) Collectively, these sideboards would indicate acknowledgment of the truth that wildlife habitat cannot be re-created, nor the displacement of wildlife & avian populations that depend upon them, thus mitigation is not a realistic option. Avoidance must be the main objective, with minimization as second.

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27.KB-14	Specific wildlife concerns: baseline surveys are essential across all wildlife/avian concerns: 1) Ravens: the predation advantage to ravens on both sage grouse and tortoise populations as mentioned in B.4.a., results in significantly increased raven populations as well as increasing their spacial distribution, simultaneous with significant decline in sage grouse and tortoise population viability. 2) The proposed route intersects habitats of both the sage grouse and desert tortoise. An alternate route must be evaluated and proposed to avoid these key habitat areas. Minimization by placement of raven perch deterrents is not adequate to prevent the decline of these 2 threatened species. 3) Migratory birds: must be surveyed so any route proposal avoids flyways, concentrated nesting areas and all water sources they depend upon. Disturbance must be relegated to previously disturbed areas. 4) Raptors: Golden eagles, hawks and peregrine falcons must be surveyed. Avoidance related to water sources such as mentioned in B.4.a. must be adhered to, as well as areas of high numbers of prey such as ground squirrels & known nesting areas. 5) Other species of concern such as burrowing owls, bats and both Dark & Kangaroo mice: baseline surveys need be conducted to determine areas of burrows, roosts & nests to be avoided and at what distance. 6) Critical indicator species of Spring snails and the Amargosa toad habitats must be completely avoided by adhering to the limitations on proximity to water sources mentioned in B.4.a. 7) Bighorn sheep lambing areas must be widely avoided. Again a science-based NDOW recommendation is essential.
27.PS-3	And urge the alternative that uses existing transmission lines and avoids the East Walker River corridor all together.
29.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project (see Figure 1. Map below). The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties. The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.
29.KE-5	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, damage tourism potential, hurt the local economy, and create health and wildlife risks.
32.KK-4	Although not allowed as a substantive comment, it still needs to be stated: the best alternative to a long transmission line is to produce the energy locally by placing solar energy panels on roofs and nearby already impacted areas. A quick look on Google maps shows acres of vacant warehouse rooftops around the TRI in south Reno.
34.JM-2	Can you or have you considered putting the transmission line underground through Oasis Valley/Beatty area? It seems like another good option to avoid many environmental and viewshed conflicts.
35.KE-3	Will you consider an alternative that would bury the line in that location (7J Ranch)?
35.KE-4	An alternative to bury the line in Scotty's Junction would also be good.
35.KE-5	You mentioned at Tule Springs that it would not be buried but you also mentioned that you would consider a burying alternative in the Oasis Valley area. It is definitely a long line and I think we just need an alternative that would show several areas for burial, like Walker Lake and Mason Valley, and it could be a good way to mitigate some of the problems. You should consider that of the guyed-lattice structures on a different line collapsed and mega droughts are going to have potential brush fires. I think this is a really good idea, it may slow the process down, but burying the line is something that would make a lot of sense and a lot of impacts could be mitigated. We don't support the line, we think its full of problems, but we need to start talking about more alternatives here.
37.K-1	The 7J Ranch route is the least obtrusive route.
37.K-4	Why can't the Greenlink follow HWY 95 from Las Vegas to Reno?
39.MG-3	The OHV community has had a huge push to move toward electric vehicles. How about we put some charging stations at the base of some of the poles?
40.SS-2	An alternative route for the transmission line that could avoid the LWC units, run adjacent to the existing infrastructure, and would incentivize project development in a lower impact area already identified by the BLM for solar development – the Millers SEZ. The alternative would adjust the transmission line to turn east at MP 106, following Highway 95 and rejoining the route at MP 165. In addition to the environmental benefits of avoiding the LWC units and following the existing environmental disturbance from the highway, this would again provide access to the SEZ.
42.NS-1	I attended the Public Scoping Meeting for the Greenlink West project on May 17, 2022 in Beatty, Nevada. At this meeting, three possible routes for the transmission lines in the Scotty's Junction area were provided: the original proposed route, Alternative A and Alternative B. I prefer Alternative A because it is on the other side of US Highway 95 (the west side) from where I live. Other electrical lines are already located on the west side of the highway.
42.NS-3	The original proposed route for the Scotty's Junction area is between my house and the mountains. The presence of the transmission lines at this location will impact the beautiful view of the mountains not only from my house but US Highway 95 as well. I believe the colors in these mountains rival those of Artist's Palette in Death Valley National Park. The view is one of the reasons that I moved to this location. If the original route is selected, burying the transmission line needs to be considered as it will prevent obstruction of the view. Burying the line, even though more expensive, will probably also mitigate the risk of fire.
42.NS-4	The towers for the transmission lines will need to be set into the ground. In this area, the water table level varies depending on location. This will need to be evaluated.
42.RC-1	Are you able to talk through the Esmeralda substation site alternatives? It would be helpful to see them & understand considerations, as they are spread 40+ miles apart.

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44.PS-2	The path of the Walker River Alternative for the Greenlink West Project would pass directly through priority habitat for the Bi-State Sage Grouse south of Mt. Grant. The proposal to list the Bi-State sage grouse under the Endangered Species Act was recently reinstated by the U.S. Fish and Wildlife Service, making conservation of this species especially important. Transmission lines adversely impact sage grouse populations by increasing predation rates on eggs and chicks from avian predators, like ravens. The negative impacts on sage grouse populations can extend 2.5 – 12.5 km from the transmission line1,2. Because the Walker River Alternative would pass within 1-8 km of several active Bi-State sage grouse breeding locations and have significant negative impacts on recreation in the East Walker River corridor, the Walker Basin Conservancy does not support this alternative.
45.RF-1	1) NV Energy already has a 400 ft corridor for lines; 2) current lines can be boosted to provide more energy; 3) new/additional lines could be installed on current poles; 4) build additional lines outside the Tule Springs Fossil Beds NM
46.TH-1	I just wanted to say the existing location of the Esmeralda County substation line (11 miles out of Goldfield) is acceptable. We DO NOT support running the lines along HWY 95 anywhere near (visibly) or through historic Goldfield.
47.AW-1	Regarding TUSK, I know you are recommending Alternative E, but if you are looking at some of the others, do you have a contingency plan for how you're going to deal with the situation if you run upon any fossil in that area? Our biggest concern is protecting any fossils that might be disrupted within the Monument.
47.RR-1	These are my comments on the proposed Greenlink West Project. I believe there are alternatives that are less environmentally and paleontologically damaging. I DO NOT support the construction of this line just to supply big businesses and California with dirty fossil fuel-generated power when there are other viable alternatives. NV Energy was given a "400 foot renewable energy corridor" in the 2014 legislation that created the Tule Springs Fossil Beds National Monument. They now say it is not big enough. The current lines running across Moccasin can be boosted to provide more power. NV Energy and BLM are not even considering this alternative.
47.RR-4	The line will be built inside the border of the Tule Springs Fossil Beds National Monument and will impact Ice Age fossils and visual resources.
47.RR-8	The line will be built next to the Mason Valley National Wildlife Refuge.
48.RS-1	How many alternatives is BLM looking at around the WWEC 18-224/MP 106-165 section (Esmeralda Valley)?
48.RS-2	The Wilderness Society would appreciate alternatives that avoid Lands with Wilderness Characteristics and citizen proposed LWC.
50.KE-1	What are the reasons for the new alternative in the Oasis Valley/Beatty area? Are you aware that is going to have pretty big viewshed issues along the whole 95 corridor? It will be highly visible to the residents of the area and have a much more severe visual impact and on plans to make this valley a scenic tourism corridor.
50.KE-3	The new alternative in Oasis Valley north of Beatty crosses private land. Has NV Energy contacted landowners?
50.KE-4	The new Beatty/7J Alternative will be much more visible to two Nature Conservancy properties.
51.SB-6	If NV Energy is unable or unwilling to attend to a revised EIS that requires analysis of the impacts associated with underground carbon capture and sequestration along the 474-mile project then the No Project Alternative must be adopted. *Note: this comment included an attachment entitled "Notes on Models of Carbon Dynamics for the California Deserts."*
52.PG-1	Thank you for considering this new alternative that avoids crossing 7J. Is the BLM looking at an alternative that would more closely parallel Highway 95 in the Tonopah area (versus crossing the Weepah Hills)?
52.SN-2	Our concerns are in the Esmeralda County portion of the Greenlink West proposal and the associated solar development that would be directly linked to the line. The proposal cuts through a very high value recreation area (refer to the following map). Highway 6, soon to be the Starriest Route in America is the center of the area with numerous areas we have identified as being Lands with Wilderness Characteristics. These stunning volcanic areas have immense potential for outdoor recreation development. That potential would be irrevocably lost with the current proposed alignment of Greenlink West and the associated substations and solar development. Our main request is that the section of the Greenlink corridor and associated solar development be moved to the northeast along the route that was identified in the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (Refer to map in Appendix 1) which states: Rationale: The recommended revisions would collocate with existing infrastructure and provide access to the Millers SEZ, facilitating solar energy development. If any proposed infrastructure (Greenlink West Transmission Line Project route or proposed Interstate 11 Project route) is approved and constructed in the future, the ROW for the new infrastructure would become a preferred route for energy transport, and the BLM and USFS should consider revising the corridor to align with that ROW.
52.SN-4	These impacts can be easily mitigated by moving the Greenlink corridor to the northeast. In early 2013, Friends of Nevada Wilderness also formally submitted an outline to the BLM Battle Mountain District Office for a high value, natural recreation area of local and regional importance on the public lands centered on what is now the proposed Esmeralda Substation and "Esmeralda SEZ." This area has some of the most stunning, natural scenic areas in Nevada and several potential biological and paleontological ACECs in the Fish Lake Valley area. Additionally, this region is along an important recreational route connecting National Parks, State Parks, National Conservation Areas, and National Monuments. This area has the potential to fulfill a critical link and need for recreation in west-central Nevada. At the heart of this important recreation area are the unique and stunning formations of the Monte Cristo South LWC, known as Monte Cristo's Castle. The BLM has been aware of unique geology, fragility of the formations, and high natural recreational values of the Monte Cristo South area potential since the early 1960s when they first considered formal protections for the area (Robb-Bradick, Tonopah, NV). In 2005, legislation was introduced into the Nevada State Legislature to create Monte Cristo's Castle State Park. The Nevada State Legislature responded in June 2007 by providing for the establishment of the Monte Cristo's Castle State Park, which would be on 5,800 acres of land administered by the BLM. To transfer the land to the State of Nevada for establishment of the State Park, the BLM would conduct an environmental assessment and other work required as part of the Recreation and Public Purpose Lease process. The proposed park included a campground, hiking areas, and interpretive trails with displays about the unique geologic formations in the area. This area can fulfill a critical need for a developed campground to serve as a center of exploration for this outstanding natural region. Unfortunately, with the financial collapse of 2007/2008, the state resources available for the creation of this new State Park vanished. Presently the Monte Cristo South area is considered a premier destination for astrotourism.

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52.SN-8	FNW REQUEST: Move the section of the Greenlink corridor (18-224) and associated solar development to the northeast along the route that was identified in the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (Refer to map in Appendix 1) which states: Rationale: The recommended revisions would collocate with existing infrastructure and provide access to the Millers SEZ, facilitating solar energy development. If any proposed infrastructure (Greenlink West Transmission Line Project route or proposed Interstate 11 Project route) is approved and constructed in the future, the ROW for the new infrastructure would become a preferred route for energy transport, and the BLM and USFS should consider revising the corridor to align with that ROW.
52.SN-9	Friends of Nevada Wilderness proposes the following as the PREFERRED ALTERNATIVE: Under the current proposal, a large percentage of the 18-224 Greenlink transmission corridor, especially from milepost 87 to milepost 166, crosses previously undisturbed public lands with medium to high potential conflicts. We propose rerouting this section north of milepost 166 along US 95, through the Millers SEZ, and then follow the existing 120-kV transmission corridor from Millers to milepost 87, crossing disturbed public lands with low potential conflicts, following existing transmission right of ways and highway infrastructure. This proposed reroute would only increase the length of the Greenlink Transmission corridor by 5 miles. This proposal: ● Follows the transmission recommendations found within the 2010 Millers SEZ Draft Solar PEIS, pg 11.7-4. ● Is in compliance with the court-ordered 2012 Settlement Agreement for Section 368 Corridors to reach the "diminution of the proliferation of dispersed rights-of-way (ROWs) crossing the landscape." ● Follows the recommendation made in the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (see Figures 3-1 & 3-2 Recommended Revisions, Deletions, and Additions to Section 368 Energy Corridors). Rerouting the corridor to follow the existing utility corridor north of Millers SEZ, up the Poleline Road to Fallon, and on to Fernley to tie in with the Northern Nevada Utility grid and the potential Checkerboard SEZ along the Interstate 80 multimodal corridor would align the Greenlink Transmission corridor with the "B1" Segment and connect to the northernmost "B2" Segment via the "e" Optional Segment for the Northern half of the Proposed Interstate-11 Corridor (see NDOT Proposed Range of Corridor Alternativeshttps://www.dot.nv.gov/home/showpublisheddocument/14018/636570426552700000). FNW REQUEST: Analyze the Friends of Nevada Wilderness preferred alternative.
52.SN-10	On May 19, 2022, at the Reno public meeting, Greg Helseth, Branch Chief Renewable Energy, BLM Nevada State Office, repeatedly stated that the Greenlink West corridor would use existing transmission corridors with existing transmission lines. This statement is misleading because the 2016 Department of Energy, Section 368, Corridor 18-244 (aka Greenlink West) Study, Table 3-7, states that the corridor length is 244.18 miles (estimated) and the length of the transmission lines within the corridor is 96.3 miles. Based on these numbers, only 39% of the corridor is developed. This means that 61%, or 109 miles of the proposed route, does not contain existing transmission lines or surface infrastructure (roads, borrow pits, or substations). The section of the proposed corridor that we are concerned with (from Milepost 87 to Milepost 166) is essentially natural with virtually neither infrastructure nor developments. Over 100 miles of the proposed Greenlink Transmission Line utilizes an undeveloped ROW through intact natural public lands, which indicates that the BLM has not yet considered other viable corridors that can work to consolidate utilities and multimodal uses to reduce the unnecessary proliferation of dispersed rights-of-way. Statements like this without all the facts appear to intentionally reduce the perception of ecological and visual impacts that would occur from a project the size of Greenlink West. Further, when asked if the proposed Greenlink Transmission Corridor has been considered as part of a multimodal corridor, including looking at the proposed alignments of Interstate-11 along the majority of the corridor, Greg Helseth replied that Interstate 11 was a fantasy and would not be considered in the Greenlink Transmission EIS. While this project may or may not happen, these huge corridors need to be co-located and coordinated to reduce impacts. There is a court ordered Settlement Agreement for Section 368 Corridors to strive to reach the "diminution of the proliferation of dispersed rights-of-way (ROWs) crossing the landscape" [Wilderness Soc'y, et al. v. U.S. Dept of Interior, No. 3:09-cv-03048 JW Joint Motion to Dismiss Case Pursuant to Fed. R. Civ. P. 41(a)(2)] and recommendations of the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (see Table on page 30 for the 18-224 Nevada row, under the Recommended Revisions, Deletions, and Additions, & Rationale columns for recommendations on aligning 18-224 with the proposed I-11 corridor). Combining the Section 368 Greenlink Transmission Corridor with the proposed Interstate-11 Project would satisfy the court-ordered settlement and be in compliance with the most recent Section 368 Energy Corridor Review recommendations (which the BLM is party to). FNW REQUEST: Reduce/eliminate proliferation of rights-of-way, and use corridors with existing disturbance wherever feasible.
53.WB-1	Reject the application for the Greenlink West Transmission Project: NO Greenlink from Tonopah to Lathrop Wells, along the eastern boundary of Death Valley National Park. As a 25-year resident and business owner in Inyo County, California, I am writing to express my opposition to the Greenlink West Project, specifically to its location between Tonopah and Lathrop Wells, and its impacts along the Amargosa River watershed south of Hwy 374; west of US 95 and east of Death Valley National Park's eastern boundary. The principal surface water body in the region is the Amargosa River, an intermittent desert river with headwaters issuing from springs northeast of Beatty, Nevada, and extending approximately 180 miles to the river's terminus at the playa in Death Valley.
54.KL-1	More of a comment of concern, I have a fear around this transmission line bringing us away from distributed and brownfield energy options. We get about 7% energy loss from these transmission lines, and we should consider getting the energy in the places that the energy is being used. Creating more transmission lines can a way that does not allow us to use the land that is already destroyed to create ethe energy we need.
55.BH-1	Since the proposed Greenlink West Project will have many adverse environmental impacts on cultural and environmental resources which almost certainly can't be mitigated, it is extremely important to have a robust project alternative analysis within the NO PROJECT ALTERNATIVE.

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55.BH-2	I would like the BLM to pay particular attention to the following NEPA Regulations 40 CFR Parts 1500-1508 (May 20, 2022), emphasis added: § 1502.14 Alternatives including the proposed action. The alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment (§ 1502.15) and the environmental consequences (§ 1502.16). In this section, agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits. (c) Include the no action alternative. In the "No Project Alternative," a detailed analysis of the environmentally and culturally less harmful alternative of rooftop solar should be required in the Environmental Impact Statement (EIS) for the proposed Greenlink West Project. It is definitely a reasonable alternative which needs to be evaluated. A reasonable No Project alternative should not be narrowly construed to mean that there will be no increased electrical capacity if the Greenlink West transmission line isn't built.
55.BH-3	A greatly expanded distributed generation solar program with battery storage can be placed on houses, schools, parking lots, industrial sites, shopping centers, etc. This means pursuing Community Solar, expanding net metering/feed-in tariff programs, and factoring in potential increased subsidies for distributed energy development. The reasonable alternative of rooftop solar must be analyzed so the public and agencies can fully assess the impacts of the proposed project. There are many proposed industrial scale solar projects which are planning to connect to the Greenlink transmission line in order to meet the renewable energy goals for the State of Nevada. If it can be shown that future electricity demands in Nevada can be accommodated via distributed electrical generation, then the huge expense and environmental and cultural impacts of the project can be avoided. Attached is a PowerPoint presentation by Bill Powers, P.E., of Powers Engineering, which illustrates how rooftop solar can feasibly take the place of industrial scale solar projects. Similar analyses can be used in the EIS for this proposed project.
57.KD-1	I had questions as to the size of the powerlines.. will this be a huge powerline system such as the Alturas powerline that went through Reno and the North valleys?? If this is the case then my recommendation would be that they be placed close to the current powerlines on Highway 95 since it's already unsightly.. The public thinks Nevada is a trash pit for nuclear waste why not accommodate this opinion.
60.JM-1	Can BLM consider an undergrounding alternative for Oasis Valley to avoid the conflicts?
60.JM-2	Can BLM consider an alternative around the Tonopah area that will keep the Greenlink line close to Hwy 95? The current proposed route would fragment a lot of habitat unnecessarily. Keeping the alignment with Hwy 95 would be a lower impact alternative and it would go by the existing substation at Miller, and there's a SEZ there too.
60.JM-4	Thank you for hosting this workshop and answering questions. I wanted to put in another pitch for considering the option to underground the line, and maybe it won't work for the Beatty area, but I do think it could be something to consider even if it is more expensive to alleviate some of the resource conflicts because Beatty is such a pinching area. Also, it often feels like economics are the bottom line for where everything falls but there are other values, and I don't understand how the BLM considers those other values. If the BLM could also consider the future pans for I-11, it would be anther option for co-alignment and minimized impacts for both projects.
61.LC-1	The Beatty Alternatives map should also identify other ranches in this area such as Torrance Ranch and Parker Ranch, and not just identify 7J Ranch, as if that is the only property of interest to avoid.
61.LC-3	Thus, our request is twofold. (1) install Project Greenlink pole line on the western edge of the "middle" corridor; and (2) install poles which can be used for future distribution feeders (as many as possible). *[Figure attached]*
61.LC-4	Some proposed line routes are over steep and rough mountain terrain, such as the Wassuk Range and others. As I understand it that is very expensive to construct. So undergrounding alternatives should be similarly analyzed regardless of cost if this transmission project is so necessary.
64.KF-8	I am puzzled why there has been talk on this call of not analyzing some alternatives when the project hasn't started scoping for NEPA yet. It seems premature.
65.GV-2	Billions are being spent subsidizing nuclear power, wind turbines, and photovoltaic panels. May I suggest spending 1% on developing and deploying some of the 50 or so clean new generators profiled below?
66.KE-6	At one point you said stimulus money fully funded Greenlink, but now it is too expensive for NV energy to go underground to help communities? You said it at the Greenlink north meeting.
66.KE-7	I live in the Beatty town and 5 miles north of Beatty. Can NV Energy tell us how many private properties Alternative K will cross and what the residents of the area will get out of it that will be positive? How does that help us? Nobody seems to know about it.
67.KK-2	The waterline infrastructure is proposed to extend through the Utility and Transportation Corridors where Project Greenlink is being proposed. Specifically, the "middle" portion of the corridor created by N-52787. The extension of the waterline infrastructure must be located on the eastern side of the corridor due to the mountainous topography of the western portion of the corridor. It is far more expensive and time consuming to bury a waterline through mountains than it is to place powerlines on mountains. The overall configuration of the corridor is as follows: Corridor Width: 2,000 feet City of North Las Vegas 3rd phase waterline: 60 feet NV Energy Greenlink West Transmission line: 200 feet (the 525 kV line as identified in the Greenlink West Transmission Project Plan of Development dated 02/15/2022) Overall Dimension: The corridor is large enough to accommodate both projects.
67.KK-3	Water and power has long been a constraint for the area and has impeded development and will continue to if the waterline infrastructure is not completed. Vegas Industrial Park intends to make a huge capital investment in bringing water and 140 MW substation to the Northern section of the Apex area thereby generating thousands of jobs and customers to the utility companies, including NV Energy. The investment in VIP is contingent upon developer being able to construct this waterline in the eastern portion of the utility corridor. Our request is to install the Project Greenlink pole line on the western edge of the "middle" corridor *[Attached figure]* . If the western edge is not deemed sufficient, we request an alternate route be selected for the project, either NH-B, or NH-C as identified in the Greenlink West Transmission Project Plan of Development dated 02/15/2022.

CID	Alternatives Comments/Statements
68.JK-9	The Department has concerns regarding the alignment crossing through the Mason Valley Wildlife Management Area (MVWMA) near the Fort Churchill Substation. Two alternatives to this alignment appear to be viable, particularly one along the U.S. 50 corridor, and the Department strongly recommends further exploring those options to prevent unnecessary impacts to the MVWMA, as well as to the Bi-State DPS of sage-grouse that the alignment crosses through to the west of the MVWMA. As there are other alternatives available, the Department cannot support the alignment of the transmission line in its current configuration.
69.TOB-4	Are there any substation alternatives closer to Beatty?
69.TOB-5	What is a native electrical concern? The 7J Ranch alternative used to be preferred, but now it is not, but that area is empty and hidden from view from Beatty. It would be a great place for solar as well, so why is it not preferred? Did you say you are now collecting data for the routes?
70.RS-3	When new power lines are absolutely necessary, they should be placed along or closely parallel to existing roads, pipelines, and other rights of way. Work should be limited to previously disturbed lands as much as possible.
71.A-1	At the l meeting, you presented at least 6 options for the Tule Springs/TUSK area. Have these been narrowed down at all?
72.EG-1	There are also human impacts. Several families live along that alternative K. Will BLM seek out those landowners for their input in addition to NV Energy or do the families have to initiate that conversation.
73.GF-1	We are one of the landowners that would be impacted by the new Beatty Alternative K, and we would definitely like to clarify that Oasis Valley is part of the Beatty Community and it would be bisected by the alternative. My understanding of the CFR is that a right-of-way is limited to the authorized use, so it is illegal to cross or use the right-of-way once it is established. Southern Nevada issued citations for it. There is a lot of questions that I know Laura brought up regarding the other ranches besides the one that is conservation land that no one is living on or trying to make a living off of it. Oasis Valley is in the zip code, we pay for Beatty school, our kids go to Beatty schools. There are SRPs and mining claims that would be affected in addition to the other private ranches.
74.PG-10	Alternative Analysis 3: alignments east of the Bare Mountains that would reconnect with Highway 95 approximately 16 miles north of Beatty (Alternatives 1–3 and NV Energy's proposed route) ▪ Findings: This series of proposed alternatives would increase landscape fragmentation by a mean of 5% (range 4.7% to 5.2%) or an average of 93 additional patches compared with baseline conditions. These alternatives would decrease median patch size by 4.2% (range 3.7% to 5.3%), which is the second highest decline of all the proposed alternatives. This suggests that large patches of habitat would be fragmented in this proposed alignment.
74.PG-11	Overall fragmentation analyses show all proposed alternative alignments would fragment the landscape in the Oasis Valley by between 4.7% and 7.5%. The fragmentation would reduce habitat patch sizes by between 3.7% and 6.2%, or a reduction in mean patch size of 14 acres, depending on the alternative. The alternative alignments to the east of the Bare Mountains would fragment larger patches relative to alignments through or around the Bullfrog Hills. This means the area west of the Bare Mountain area is relatively intact with few roads or other disturbances and has higher wildlife value. We encourage the BLM to evaluate additional alternatives through the Bull Frog Hills in the Draft EIS because the data suggests there is less likelihood for impacts from habitat fragmentation in that area compared with other alignments in the vicinity.
74.PG-13	Weepah Hills (Tonopah) Area. The proposed alignment would result in the new line crossing the Weepah Hills southwest of Tonopah. There is currently no other linear infrastructure in this area. Rather than crossing the Weepah Hills and fragmenting currently undisturbed habitat, we urge the BLM to advance an alignment consistent with the BLM's Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report, released in April 2022. Figure 3.5-20c of the report (see Figure 2) [Attached figure 2] illustrates the recommended Section 368 energy corridor revision to follow Highway 95. According to the BLM's final report the recommended corridor revision "would collocate with existing infrastructure and provide access to the Millers SEZ facilitating solar energy development." Not only would an alignment following the revised 368 Energy corridor avoid new impacts in the Weepah Hills, but it would also provide a more direct connection to the Miller's solar energy zone. We ask that the BLM include in the EIS an alternative reflecting the recommended corridor revision.
74.PG-14	Mason Valley (Yerington) Area. We hope the northern terminus of the main 525kV line entering the Fort Churchill substation will avoid the Mason Valley Wildlife Management Area (WMA). It appears the proposed alignment will parallel the existing transmission lines along the eastern boundary of the WMA and the railroad corridor along the northern boundary of the WMA. Collocating the line with these linear features is a great example of smart-from-the-start project design. TNC also sees an opportunity for the Greenlink West line to support future clean energy development on former mine lands. One such opportunity is the Anaconda Mine near Yerington. This site is currently being remediated and could be an excellent example of siting new renewable energy on a previously disturbed site, especially given the proximity of the site to the Fort Churchill Substation. Additional opportunities exist at the Carson River Mercury Superfund site which is close to the ancillary transmission lines that are planned for servicing the Tahoe Reno Industrial Complex.
74.PG-17	We also encourage the BLM and NV Energy to coordinate with the Nevada Department of Transportation and Federal Highway Administration to better understand and disclose the potential alignment of the Interstate 11 transportation route relative to Greenlink West. In addition to disclosing and analyzing the Interstate 11 project as a reasonably foreseeable future action in the cumulative effects section of the EIS, there is an opportunity for co-locating these major linear disturbances. This would avoid unnecessary duplicative linear disturbances and would be consistent with Section 503 of the Federal Land Policy and Management Act of 1976, which directs federal agencies to designate right-of-way corridors to "minimize adverse environmental impacts and the proliferation of separate rights-of-way…" Because the Greenlink West EIS and Record of Decision would include a resource management plan (RMP) amendment to relocate the existing utility corridor, the corridor alignment and width should be able to accommodate Interstate 11.
74.PG-5	For example, placing the line along existing roadways and transmission lines minimizes new impacts. We strongly encourage the BLM and NV Energy to advance a preferred alternative that has all route segments directly paralleling existing linear disturbances. We offer the following input regarding three specific portions of the proposed line where analyzing additional alternatives may avoid unnecessary impacts on wildlife habitat and other conservation values.
74.PG-7	To understand the potential impacts of the proposed line on wildlife habitat in the Beatty area, TNC staff conducted a fragmentation analysis of three alternative alignments (see Figure 1 [Attached Figure 1] for a depiction of our analysis). The fragmentation analysis examines how linear features such as roads and transmission lines dissect the landscape to create patches of land isolated by disturbance. Landscape fragmentation reduces the size of habitat patches for wildlife and facilitates the establishment of invasive species and increases mortality of wildlife species, particularly slow-moving terrestrial species like the desert tortoise and Amargosa toad. Our findings for several possible alignment alternatives are below (alternative numbers listed correspond with Figure 2).

CID	Alternatives Comments/Statements
74.PG-8	Line alternatives that would follow Highway 95, cross west of Beatty through the Bull Frog Hills, then reconnect with Highway 95 north of Beatty ▪ Findings: Two possible routes in this area would have similar fragmentation at 6.9% (Alternative 6) and 7.5% (Alternative 5) – or 128 and 140 new patches, respectively, which would be created by fragmenting or spitting larger patches into smaller patches. These alternatives would have the highest fragmentation index of all proposed alternatives and reduce mean patch size by 3.7% (Alternative 6) and 4% (Alternative 5). While these proposed alignments would have the highest fragmentation, the median patch size would be smaller than the other alternative alignments suggesting smaller patches would be fragmented.
74.PG-9	Alternative Analysis 2: an alignment east of the Bare Mountains crossing Highway 95 approximately 1 mile north of Beatty (Alternative 4/BLM proposed Alternative F) ▪ Findings: This proposed alternative would increase landscape fragmentation by 6.9% compared with baseline conditions. This alternative would also decrease the median patch size by 6.2%, which is the largest decrease in patch size of any proposed alternative and suggests large patches of intact habitat would be fragmented with this alignment.
76.UNK-1	The path through the national monument is unacceptable. We can no longer allow renewable energy to decimate our landscape via lithium and other metals mining and 500 foot tall transmission lines.
79.JP-2	FIRST OF ALL, LETS REDESIGN THIS ELECTRICAL TRANSMISSION LINE THROUGH NEVADA STATE PARKS AND NEVADA PRIVATE LAND.THIS WILL BE A FINANCIALBOON FOR THOSE WHO OWN PRIVATE LAND AND WILL ALLOS OUR NATIONALLAND TO BE UNTOUCHED ASIT SHOULDBE. WENEED A REDESIGN OF THIS TRANSMISSION LINE GOING THROUGH NEVADA STATE LAND, COUNTY LAND,PRIVATE LAND, TOWN LAND,ALL OF WHICH ARE PERFECTLY GOOD FOR TRANSMISSION LINES AND ALREADY SHOW DEVELOPMENT SO WE WILL NOT BE INVADING NATURE.
80.JCR-3	We hope that the concerns that are voiced will be seriously looked at and alternatives will be found for the Greenlink West Project.

CID	Mitigation Comments/Statements
09.AR-6 Part 1	1. NV Energy shall acknowledge the LADWP Transmission Line Rights-of-Way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC), an organization of the Federal Energy Regulatory Commission (FERC). Safety and rotection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights-of-way serve as platforms for access, construction, maintenance, facility expansion, and emergency operations. Therefore, the proposed use may, from time to time, be subject to temporary disruption caused bysuch operations. 2. NV Energy shall be responsible for the maintenance of the Project area and shall keep the area in a neat and clean condition within LADWP's TLRW. It is our understanding NV Energy shall assume responsibility for the maintenance of the project improvements, and for all the risks and liabilities associated with the proposed improvements. LADWP shall not be liable for any damage to the proposed project during LADWP's operation and maintenance activities. 3. A permanent, unobstructed 20-foot wide roadway (patrol road), accessible at all times by LADWP maintenance personnel shall be provided and maintained. A wider roadway width may be required on curved segments. The roadway must remain open and unobstructed, excluded from any watering and kept as dry as possible at all times. 4. No excavations are allowed within 50 feet around the base of tower footings. 5. No improvements or construction activities of any kind whatsoever will be allowed within the TLRW without the prior written approval of the LADWP. 6. Conductor Clearances will be subject to the review and approval of the Transmission Engineering Group. The LADWP will need a copy of the conductor survey from NV Energy illustrating the cross sections showing our existing conductors and proposed developments. See attached LADWP Conductor Survey Instructions. The Transmission Engineering Group will use the data to calculate and confirm that conductor clearances meet the National Electrical Safety Code (NESC). 7. No equipment taller than 14-feet shall be used under the TLRW. It is NV Energy's responsibility to comply with all applicable standards and safety regulations while working near or under high voltage overhead transmission lines. 8. No grading or structures shall be constructed within the TLRW without prior written approval of the LADWP. 9. NV Energy to provide the location and elevations (heights) of all above and below ground structures, including the cross sections of existing and proposed Project within and adjacent to the TLRW. All ground elevations are to remain unchanged from existing conditions after construction associated with the NV Energy proposed project is completed. Cut & fill slopes inside the TLRW steeper than 2 horizontal to 1 vertical require retaining structures or geotechnical report approval. Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than thirty-five (35) feet or as noted in the State of California, Public Utilities Commission (CPUC), General Order 95, or the NESC whichever is more restrictive, within the TLRW is unacceptable.
09.AR-6 Part 2	10. Ground cover for all below ground utilities shall not be less than four (4) feet. 11. California Code of Regulations, Title 8, Section 2700 defines "qualified electrical workers" as "a qualified person who by reason of a minimum of two years of training and experience with high-voltage circuits and equipment and who has demonstrated by performance familiarity with the work to be performed and the hazards involved." This definition of "qualified electrical workers" shall be equivalent to OSHA's definition when applicable outside of California. At all times during installation, replacement, and/or maintenance of any improvement authorized within the TLRW, NV Energy shall have at least one qualified electrical worker on site to observe said work and ensure all OSHA required safety protocols are followed. 12. When grading activity affects the transmission line access roads, NV Energy shall replace the affected access roads using LADWP's Access Road Design Criteria. See attached. 13. No grading is allowed below the top of tower footings within the TLRW, located in the immediate vicinity of the towers. 14. All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with the National Electric Code, Article 250. 15. The right of way contains high-voltage electrical conductors; therefore, NV Energy shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders, California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction or the National Electrical Safety Code, whichever is more restrictive. 16. An area at least 100 feet around the base of each tower must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high pressure water spray. 17. Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc. 18. Condition Nos. 1-9, 11A, 12-22C, 23A-23B, 25, 27-29, and 31A-32 of the Standard Conditions for Construction shall apply. 19. If any excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. NV Energy shall be responsible for coordinating relocation of utilities, if any, within the project boundaries. Before commencing any excavations, Underground Service Alert (a.k.a. DigAlert) shall be notified.
10-ELR-5	Placement of Transmission Lines – In California, the BLM has designated utility corridors in which to consolidate the location of new with existing transmission lines and pipelines, but we are unsure if similar designations exist in Nevada. It is also the practice in California to locate new transmission lines on the same side of the road as existing lines to consolidate direct and indirect impacts. Please be sure that the DEIS (1) documents the location of the proposed project relative to designated utility corridors, if any, and (2) for each stretch of the right-of-way (ROW) describes existing utility lines and the new line as to whether one or both are on the same side of the highway, which appears to be US Highway 95. We request that the proposed utility line be placed on the same side of the highway as existing utility lines.
10.ELR-8	Tortoise Protective Measures – Once protocol surveys for the tortoise are completed and all tortoise sign has been mapped, it is important that these results be shared with the contractor and particularly field-based construction personnel. In those areas that are apparently occupied by denser tortoise concentrations, BLM should increase protective measures during construction and operations and maintenance, like reduced speed limits (15 miles per hour is recommended), designated routes of travel blocked from public access and no vehicle travel by the public would be allowed, and perhaps structurally-different facilities. An example of the last type of protective measure would be in those portions of the ROW in tortoise habitats, we recommend that transmission poles or towers be designed to limit new raven nesting opportunities.
10.ELR-12	The DEIS should include appropriate mitigation for all direct, indirect, and cumulative effects to the tortoise and its habitats, including temporal impacts; the mitigation should use the best available science with a commitment to implement the mitigation commensurate with or prior to impacts to the tortoise and its habitats both within the ROW and in affected adjacent areas. Mitigation should include a fully-developed desert tortoise translocation plan; predator (e.g. raven, coyote, etc.) management plan; invasive weed management plan; tortoise habitat fire prevention management plan; compensation plan for the degradation and loss of tortoise habitat that includes protection of the acquired, improved, and restored habitat in perpetuity for the tortoise from future development and human use; a plan to protect tortoise translocation area(s) from future development and human use in perpetuity; and habitat restoration plan when the lease is terminated and the proposed project is decommissioned.

CID	Mitigation Comments/Statements
10.ELR-13	The invasive species management plan covers more than noxious plant species. BLM is mandated by Executive Order 13112, Invasive Species, section 2(a)(2) and 2(a)(3) to "detect and respond rapidly to and control populations of such [invasive] species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded;" and "that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions." BLM policy (BLM 2008a) that states "multiple use and sustained Desert Tortoise Council/Comments/Greenlink West Project.6-1-2022 6 yield principles are best served by healthy and productive land, of which vegetation is a key component. By focusing programs on maintaining and restoring native plant communities on public land, BLM can be more successful at fulfilling a vital part of the agency and DOI mission."
10.ELR-14	Mitigation Implementation, Success Criteria, and Monitoring – These mitigation plans should include an implementation schedule that is tied to key actions of the construction, operation, maintenance, and restoration phases of the project so that mitigation occurs concurrently with or in advance of the impacts. The plans should specify success criteria, include a monitoring plan to collect data to determine whether success criteria have been met, and identify actions that would be required if the mitigation measures do not meet the success criteria. Monitoring is crucial to determining the effectiveness of mitigation measures. Consequently, we request that BLM demonstrate throughout the EIS how it is complying with its monitoring requirements (see Chapter 11 Monitoring in BLM's NEPA Handbook – BLM 2008b) especially for indirect impacts to the tortoise and tortoise habitat.
11.AM-22	The EPA recommends that the BLM identify in the Draft EIS the mitigation measures (including control measures and design features) it would apply if adverse impacts to resources on affected lands are predicted. These measures could include equipment type or design requirements, emission standards or limitations, best management practices, add-on control technologies, setback distances from aquatic and biological resources, and limitations on the density and/or pace of development around features (e.g., substations) associated with the Greenlink West Project.
13.KE-27	Ravens represent a significant threat to tortoises, and may increase due to construction related activities, increased artificial perches and nesting platforms, water sources, and trash. How will this be mitigated? Will there a Raven Management Plan that is written during public review?
13.KE-32	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft. Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management (VRM) Class designations to allow for industrial development in scenic areas of public lands. Due to these impacts, a few land use plans would need amendments. Since July, 2021, the BLM has been talking about a Nevada State-wide Resource Management Plan revision. These revisions would help the public become involved more in these processes. Maps need to be made showing VRM class areas. VRM 2 areas are present in portions of the proposed route, and BLM tells us in meetings these will need to be downgraded. For example, the Tonopah BLM district was not able to locate all of the VRM Class maps in the area when they were asked. Equally, the line will cut through some VRM Class III lands. The project manager at the public meeting stated that even some of the Class III lands the line would cross would require amendments. This is the VRM Class II Objective: To retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. This is the VRM Class III Objective: To partially retain the existing character of the landscape. Allowed Level of Change: 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. We request that certain VRM Classes be reviewed and upgrade to VRM Class II under our ACEC/Conservation Alternative. If BLM approves the project, the Land Use Plan amendments would need to retain the lower VRM Class to accommodate the solar project. This is another example of why the project should be put on hold until a final decision can be made on the Nevada State-wide RMP Revision. For the Tule Springs Fossil Beds National Monument, it would be impossible to mitigate any visual impacts that would be inflicted on the monument by this transmission project. Mitigation options that would be considered would be: 1. Shorten the height of the poles. The poles would be up to 180 feet tall. If they were shortened, the view from longer distances may be mitigated, but the line would be closer to the ground and the visual disturbance would be unacceptable for visitors within the monument. 2. Bury the line. 3. Paint the line a blending color so it is not as visible: This would still create a huge visual contrast, cast unsightly shadows and possibly reflect in moonlight. Plus, camouflaging the color may cause more raptor collisions.
49.RS-2	There are some mitigation measures, such as promptly removing road kills, litter, and garbage, trying to raven-proof structures, and using drones to oil eggs in raven nests. While these measures - if properly and consistently implemented - may reduce tortoise mortality, they won't stop some from occurring. Relocating tortoises in harm's way may save some but not all of the tortoises that may otherwise be killed. Where some tortoise mortality or habitat loss occurs, there should be full compensation to advance tangible tortoise conservation in other locations. For example, when a huge new natural gas pipeline was constructed through key sage grouse habitat, some mitigation compensation funds were used to do voluntary buyouts of BLM livestock grazing permits in sage grouse areas. This same mitigation could help tortoises, as BLM unfortunately still allows harmful commercial livestock grazing in some tortoise habitats. Mitigation funds could also be used to plant native vegetation in areas where one or more cheatgrass fires occurred in tortoise habitats. Some of these types of projects have already been successful, often when pre-emergent herbicides are used to knock down germinating cheatgrass and then native seeds and/or plants are put in. Of course, livestock grazing should not occur in these treatment areas because it would decrease the native forage and increase ground disturbance and cheatgrass proliferation.
52.SN-11	While Friends of Nevada Wilderness recognizes that we are only in the scoping stage of this project, mitigation will be necessary to address reduced recreation, habitat fragmentation, increased invasive and non-native species, and impacts to economies. We are requesting a minimum of a 1-1 replacement ratio, which may be higher dependent on the values of the impacted public lands. FNW REQUEST: Friends of Nevada Wilderness is requesting a seat at the table to develop mitigation strategies to resolve significant impacts to all natural and cultural resources.
68.JK-8	The Department recommends mitigation measures only as a last resort, after avoidance and minimization has been implemented, and mitigation should be addressed through conservation actions or dedicated mitigation funding.

CID	Information Requests
09.AR-2	The TLRW contains transmission lines and ancillary appurtenances (Facilities) which are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities (Public). The Safety and protection of these critical Facilities are paramount in consideration of the Project. LADWP has determined that additional information is needed from NV Energy before any developments are authorized within the TLRW.
09.AR-4	The information LADWP received, to date, is inadequate for properly reviewing the proposed improvements within sections of LADWP's TLRW. LADWP therefore reserve the right to comment until more detailed information is provided regarding the proposed project. LADWP asks NV Energy to: a. Provide plans illustrating the TLRW boundaries within the proposed project. b. Include towers and clearances from the proposed transmission line. c. Provide grading plan and utility plans, including any other plans illustrating the impacts to LADWP's TLRW. d. If access roads are proposed, provide plans illustrating impacts to LADWP's access roads. The submitted plans should include APNs, state plane coordinates, or use the Public Land Survey System to locate the developments impacting LADWP's TLRW.
11.JM-1	We appreciate the opportunity to comment at this early stage of the project. Can you provide contact information for the representative from NV Energy, Lee Simkins, who was the workshops and also for the person at Logan Simpson, the contractor BLM hired? We would like to also share our concerns about the proposed Greenlink route with them.
12.PG-1	Thanks again for looking at the new alternative K near Beatty. Would you or Logan Simpson be able to send me the shapefiles or Google earth files for the various route alternatives BLM is considering?
16.KE-1	And I'm here as a resident of Northern Oasis Valley. And the first comment is kind of relating to the question I asked. That alternative, all you have is a real vague map.You changed the letters two times. You did get a letter signed by a lot of landowners asking for their concerns. And the one I'm talking about is over near Bailey Hot Springs, near Springdale. And it would really be beneficial for the company, at least, to try to explain a little more what you're thinking. I see it all on a very narrow strip of BLM land. But there are people that are going to be right next to that, and they'll be impacted. So how about a meeting with us? And this meeting is not enough information for that particular thing.
18.HD-1	Is it possible to obtain the shapefile of the proposed alignment?
19.DC-1	Is it possible to get a list of participants and email addresses?
22.JH-1	Request full-size hard copy of Greenlink West Project Overviwe (~40 x 40")
29.CL-1	Will you be posting your alternatives on the website as KMZs? The current file, as I'm looking at it, only has the proposed action.
30.KE-2	At the BLM meetings since last June, Greg Helseth and some NV Energy folks were saying that the power from Greenlink West would only be moved north. We were told by BLM that power can't move both ways for a transmission line like that. But at the recent meeting last week, BLM said that the energy will now move both north and south. Can you explain the confusion here? What is the actual story? Will Greenlink West be moving power both ways or just north? Can we get some clarification for the comments by the comment deadline on the 1st?
32.F-1	Will your PowerPoint slides be posted on the project website?
41.MR-1	I am a civil engineer working on a large master planned community development project (Talus Valley) abutting the NVEnergy Mira Loma Substation where the Greenlink Transmission Project comes into the south Reno area. Please see below email and attached overall site plan. NVEnergy requested that I forward to you my comments and questions. Please call or email me if you have any additional information. (*Comment included a Talus Valley Site Plan as an attachment.)*
41.MR-2	Thank you for getting back to me. I have reviewed some of the materials in the links you have provided and we will attend the upcoming BLM meeting on 5/19 in Reno. The project we are working on (Talus Valley) is a master planned community abutting the Mira Loma substation (see attached overall site plan). One thing that caught my eye is Construction/Material Yard 1 on Map 1 of the "Greenlink West Transmission Project Plan of Development". The shape of Yard 1 and its proximity to existing roads make it appear to fall directly on Village 23A of the Talus Valley Project. Please let us know if this is intentional or if Yard 1 is intended to be on BLM land just north of Village 23A. Also, please let us know if you foresee any impacts to the Talus Valley project from the Greenlink Project. Feel free to call or email me. We are happy to have a meeting to discuss how these two projects might interact with each other. (Comment includes map showing location of Talus Valley development)
46.RL-1	At the public meeting last week in Reno, the matter of wildlife baseline reports was discussed. The BLM Project Lead indicated the BLM, through their contractor, was conducting wildlife baseline studies along the entire route of Greenlink West. I would be interested in seeing these baseline wildlife surveys. Please send me all the available information on how the surveys were conducted and what the results of the surveys concluded.
56.UNK-1	How big are the substation yards How big are the staging yards--will they disappear after Heard restrictuions about activity around the "poles" Are there lights on the towers re aviation, mil, & civil What's height Water usage during & after The Great Solar Projects - how do they get on the wire Look up NV Energy?
57.KD-1	I had questions as to the size of the powerlines.. will this be a huge powerline system such as the Alturas powerline that went through Reno and the North valleys?? If this is the case then my recommendation would be that they be placed close to the current powerlines on Highway 95 since it's already unsightly.. The public thinks Nevada is a trash pit for nuclear waste why not accommodate this opinion.
59.HS-1	As a follow up to our phone conversation, I am sending this email regarding the Garnet Valley Wastewater System. I saw the recent .kmz information that was posted on the Greenlink West website and was wondering if you have any additional information that you can share about the proposed alignment in the Garnet Valley area. I understand that pole locations are yet to determined for Greenlink West as NVE will select the pole type and locations closer to the end of design, but if there is other information that you think would be helpful for coordination, our team would welcome it.
63.BL-1	Will this slide deck be available? Could you please identify what the Longstreet Tower is, if applicable to this project?
65.IL-1	Are shapefiles of the right of way available to the public?

CID	Information Provided
02.AGA- Part 1	The mineral potential of the Beatty District is described by several sources: 1. The Nevada Division of Minerals ("NDOM") identifies three mining districts in the area. These are the "Bare Mountains" "Bullfrog" and "Transvaal" districts. The approximate locations of these districts are noted at: https://gisweb.unr.edu/MiningDistricts/ The NDOM GIS weblinks also post available historical documentation on the mineral occurrences, mining details, and other geological details. These reports are publicly available to supplement the mineral potential review if needed. 2. Mineral assessments are available from exploration companies in the form of 43-101 reports (e.g., Augusta Gold: Mineral Resource Estimate Bullfrog Gold Project March 2022), S-K-1300 filings with the Securities and Exchange Commission (e.g., Technical Report Summary Silicon Project - An Initial Assessment, March 2022), and other technical reports (e.g., Corvus Gold Nevada: Preliminary Economic Assessment - Mother Lode Project, November 2020). These reports provide details on the local and district potential. These reports are publicly available to supplement the mineral potential review if needed. 3. Various assessments and compilations have been conducted by the BLM (Battle Mountain District Office RMP update 2012, and Tonopah RMP 1994&1997) and the Department of Energy (Environmental assessment for the Proposed Withdrawal of Public Lands Within and Surrounding the Caliente Rail Corridor, Nevada, 2005) to compile the mineral potential in advance of or supporting federal actions in the area. These reports are publicly available to supplement the mineral potential review if needed. BLM has authorized AGA's and other companies' mineral exploration and development activities in the Beatty area under multiple EPOs (e.g., AngloGold Ashanti (Silicon); Coeur (Crown); Corvus (Mother Lode and North Bullfrog)), and multiple Notices in the Beatty area, as well as MPOs (e.g., Coeur (Sterling); AGA/Corvus (North Bullfrog, in preparation); Waterton (Reward)). These plans are available from the BLM e-planning website. The NDOM GIS weblinks also posts available Notices, Exploration Plans, Mining Plans, and Project Fact Sheets (NDEP-BMRR). These are available at: https://data-ndom.opendata.arcgis.com/pages/mcpoonoi. Specific to AGA's activities in the Beatty district: Number of unpatented mining claims: 4,399 Acreage covered by unpatented mining claims: ~90,883 AGA investment in Beatty District to date: >$425M (to include the Corvus Gold Inc. acquisition) Mineral Resource: 3.37M ounces of gold and 14.12M ounces of silver (Silicon deposit only)
02.AGA-5 Part 2	BLM Approved Plans of Operation and Exploration Notices: 1. North Bullfrog Exploration Project – Plan of Operations NVN-83002 2. Silicon Exploration Project – Plan of Operation NVN-097820 3. Mother Lode Exploration Project – Plan of Operations NVN-096238 4. Rhyolite Project – Notice N-99442 5. Transvaal Project – Notice N-99767 6. Lynnda Strip Exploration Project – Notice N-099658 7. North Bullfrog Baseline Characterization – Notice N-092210 8. Willy's – Notice N-096894 9. Sawtooth – Notice N-096991 10. East Bullfrog – Notice N-093906 Nevada Division of Environmental Protection (NDEP) Approved Permits: 1. North Bullfrog Exploration Project – • Bureau of Mining Regulation and Reclamation (BMRR) - Reclamation Permit (Public) 0290 • BMRR - Reclamation Permit (Private) 0280 • Bureau of Air Pollution Control (BAPC) – Surface Area Disturbance (SAD) Permit AP1041-4009 • Plan to submit WPCP, BAPC, and other applications for mining 2. Silicon Exploration Project – • BMRR - Reclamation Permit (Public) 0404 • BAPC - SAD Permit AP1041-3994 • Plan to submit WPCP, BAPC, and other applications for mining 3. Mother Lode Exploration Project – • BMRR - Reclamation Permit (Public) 0392 • BAPC - SAD Permit AP1041-4307
10.ELR-2	The Council was informed by a third party, not the BLM, of the opportunity to provide scoping comments in response to the BLM's publication of its Notice of Intent (NOI) to prepare a draft environmental impact statement on the Greenlink West project. In our November 7, 2021 comment letter to the BLM on the proposed project, we reminded BLM of our request "to be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above." In addition, a copy of this letter with this request was sent to the Nevada State Director of BLM. As stated in our November 2021 letter, "As the Council has made similar requests to the BLM in Nevada at the field and district office levels, including sending certified letters to managers that have been ignored, we are copying the Nevada State Director with the hope that he will direct BLM in southern Nevada to inform the Council of public comment opportunities for this and future proposed projects in the range of the Mojave desert tortoise. We remind BLM that our email address is eac@deserttortoise.org." Because our request has been ignored at the field, district, and state office levels of BLM, we are sending a copy of this letter to the Director of BLM. The following comments and attachment are in response to the NOI. They should be added to the comments provided to the BLM in a letter dated November 7, 2021.

CID	Information Provided
10.ELR-20	Assuming that tortoises occur along/near the alignment and that a formal Section 7 consultation results in issuance of a biological opinion, please be aware of the following requirements. Section 7(a)(1) of the Federal Endangered Species Act (FESA) states that all federal agencies "…shall… utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to Section 4 of this Act." In Section 3 of the FESA, "conserve," "conserving," and "conservation" mean "to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary. Such methods and procedures include, but are not limited to, all activities associated with scientific resources management such as research, census, law enforcement, habitat acquisition…" The Council believes that tortoise trend data (Allison and McLuckie 2018) demonstrate that BLM's management of the Mojave desert tortoise and its habitat has not been effective in meeting BLM's Section 7(a)(1) mandate of carrying out programs for its conservation. To meet its Section 7(a)(1) responsibilities, the BLM needs to adopt and implement management actions similar to those of the National Park Service (NPS). The NPS' land management practices are closer to managing areas of land as reserves, which is what the 1994 Recovery Plan (USFWS 1994b) described as part of the recovery strategy for the Mojave desert tortoise. While BLM designated Desert Wildlife Management Areas (DWMAs) as one part of the recovery strategy, it has not thoroughly implemented other parts of the recovery strategy. According to the Recovery Plan, DWMAs were to be managed as reserves; that is, they were areas of land to keep, save, preserve, or protect. BLM did not identify and implement needed recovery actions within each DWMA to manage the DWMAs as protected areas for the Mojave desert tortoise.
10.ELR-21	We appreciate this opportunity to provide input and trust that our comments will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the Desert Tortoise Council wants to be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises. We would like to receive notification from the BLM when an action that is proposed in the range of the tortoise and may be authorized, funded, or carried out by BLM. In addition, we request that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we ask that you respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this project.
13.KE-2	Western Watersheds Project is a non-profit organization with more than 12,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy. Basin and Range Watch is a 501(c)(3) non-profit working to conserve the deserts of Nevada and California and to educate the public about the diversity of life, culture, and history of the ecosystems and wild lands of the desert.
13.KE-31	The primary legislation pertaining to fossils from NPS and other federal lands is the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11) which was enacted on March 30, 2009 within the Omnibus Public Land Management Act of 2009. PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to manage and protect paleontological resources on Federal land using scientific principles and expertise. The Secretary shall develop appropriate plans for inventory, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies. These plans shall emphasize interagency coordination and collaborative efforts where possible with non-Federal partners, the scientific community, and the general public. National Park Service Mission Statement: "The National Park Service is dedicated to conserving unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world." Constructing a large industrial-scale transmission line through any part of Tule Springs Fossil Beds National Monument would be inconsistent with the mission on the National Park Service. Potential impacts on paleontological resources resulting from construction of the proposed Project primarily would involve terrain modification and road building. Paleontological resources may be significantly impacted, including an undetermined number of fossil remains and unrecorded fossil sites; associated specimen data and corresponding geologic and geographic site data. Direct impacts could result from vegetation clearing, grading, widening of road cuts, and any other earth-moving activity that disturb or bury previously undisturbed fossiliferous sediments, making those sediments and their paleontological resources unavailable for future scientific investigation. The Pleistocene fossil beds here are a very significant resource and some of the richest Ice Age faunas in the Southwest. There is no way to mitigate the destruction of these rare fossils, and save the associated information associated with them: placement, sediments, microfossils, and other geological and taphonomic data that need to be preserved intact for their high value. Punching deep holes to lay foundations for giant transmission towers would results in destruction of significant and irreplaceable paleontological resources.
14.CH-2	HTI and BAH are responding to this request for public comment for the GL WP as our organizations directly have significant hist01y and access to pertinent details with three of the eight planning criteria called out in the Bureau of Land Management (BLM) Federal Register Notice of Intent. The first criteria related to HTI and BAH is Criteria 3: "The BLM will consider the present and potential uses of public lands and where existing RMP decisions are valid, those decisions will remain unchanged." The details of the HTI/NATC's ongoing use of public lands are substantial and are fmther detailed within this response. Criteria 8: "Any RMP amendments will recognize valid existing rights" applies as HTI holds existing BLM Land Use and Grazing Permits. Additionally, with respect to Criteria 6: "The BLM will seek coordination and consistency with other government programs including Tribal plans and policies". HTI/NATC is a Department of Defense (DoD) contractor, a pait of the Defense Industrial Base as defined by the Depaitment of Homeland Security, and provides essential products and services required to meet national security commitments to the Federal Government and the U.S. Military.
14.CH-8	Indeed HTI/NATC have a long and extensive relationship with the BLM. HTI/NA TC has been testing vehicles on existing roads that traverse private, State, Bureau of Reclamation, Nevada State Parks, Walker River Indian Reservation, and BLM-administered public land since 1957. In 1984, the BLM issued HTI/NATC Land Use Permit numbers N-47168 and N-3649 authorizing HTI/NATC to test and operate vehicles and equipment on public land for commercial purposes. Those permits expired in May 2002. Land Use Permit N-66753, along with Environmental Assessment NV-030-01-021 and the Road Use Plan, were generated to suppott a nationwide commercial and DoD demand for vehicle testing services such as those that HTI/NATC provides. DoD vehicle testing revolves around what is deemed a "duty cycle", in which each specific vehicle needs to be tested against a pa1ticular breakdown of terrain roughness. The terrain roughness is determined by the location to which vehicles will be deployed, and the end users of the vehicles. HTI/NA TC' s service is to replicate the exact terrain roughness, which tests vehicles in real world situations. Therefore, the condition of the roadways on HTI/NATC privately-owned land, as well as on the public lands, needs to stay in its current, unchanged, specific terrain roughness.

CID	Information Provided
14.CH-9	In the past 40 plus years, HTI/NATC has expended millions of dollars to continuously measure and maintain these reference test conditions. Precise profiles of sections of these terrains are utilized by various DoD organizations including the US Marine Corps, the Office of Naval Research, the US Army, etc. in current and future manned and unmanned vehicle development. These profiles are integrated into physical test events and into the vi1tual computer simulations which are used to develop the designs and then to suppo1t the fabrication and entire life cycle of the vehicle. Often HTI/NATC is required to initiate vehicle tests or perform additional measurements and analysis on a moment's notice in order to address operational issues which require immediate corrective action. This ongoing work includes continuous product improvement evaluations throughout the life of the vehicle. There often is not time or funding to conduct evaluations which would directly compare the old vehicle to the new vehicle. Therefore, in order to save substantial taxpayer funds and because of the HTI/NATC continuous eff01t to properly maintain these road conditions to a consistent calibrated criteria, the new vehicle system is tested and directly compared to the results of vehicle tests which were conducted many years previously. The loss of this capability will substantially increase the cost and time required to complete these essential test activities potentially preventing needed capabilities from reaching operational personnel.
14.CH-12	In addition to the business and logistical issues set fo1th above, HTI and BAH fmther offer public comment on the potential environmental impacts of the current proposed action route.--HTI went through the National Environmental Policy Act (NEPA) Environmental Assessment (EA No. NV-030-01-021) procedure for approval of Land Use Permit N-66753. That educational experience related to the area between the proposed GL WP Foti Churchill Substation and U.S. Highway 50 East are valuable to highlight.
27.KB-16	Far more key information with NDOW input, particularly in detailed mapping, needs be provided to enable informed public comment.
41.MR-1	I am a civil engineer working on a large master planned community development project (Talus Valley) abutting the NVEnergy Mira Loma Substation where the Greenlink Transmission Project comes into the south Reno area. Please see below email and attached overall site plan. NVEnergy requested that I forward to you my comments and questions. Please call or email me if you have any additional information. (*Comment included a Talus Valley Site Plan as an attachment.)*
50.RS-1	Comment consists of a copy of an article entitled "Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation"
51.SB-1	The Greenlink West Project (Project) is an approximately 474-mile system of new 525 kV and 345-kV overhead electric transmission lines and includes transmission and distribution lines, substations, microwave radio facilities, amplifier sites, access roads, and construction/material yards. As stated in the application to the BLM, NV Energy has applied for a 600-foot-wide temporary ROW for construction and a 200 foot-wide permanent ROW for operations and maintenance of the 525-kV line and a 160-footwide permanent ROW for the 345kV lines. The facilities would include approximately 13,787 acres of land of which approximately 10,438 acres are public lands administered by the BLM. As stated, the purpose for the Project is to alleviate some of the capacity issues on existing transmission lines, and enhance electric grid reliability, by allowing interconnections to occur throughout the State. The Project will run from Las Vegas to Reno through Clark, Nye, Esmeralda, Mineral, Lyon, Storey and Washoe Counties. The end-point of Greenlink West would be Apex, Nevada, and three natural gas generating facilities bringing the natural gas baseload needed to power the tech companies and warehouses in Sparks and Reno. The Federal Register indicated that the transmission line would not benefit rural Nevada. Clearly Greenlink West is actually a “Gaslink” Project, yet, there are already 230 square miles of solar applications that have been tallied and investigated by Basin and Range Watch (https://www.basinandrangewatch.org/) to take advantage of the new transmission corridor. As a point of reference 230 square miles equals 147,200 acres or 11 times the acreage estimated for the transmission corridor. The majority of the proposed Project’s 474-mile transmission corridor crosses remote and undisturbed portions of the Mojave and Great Basin Desert biomes (see Google Earth for Las Vegas to Reno terrain). Given the unique and undisturbed nature of lands within the proposed corridor, multiple adverse environmental effects are anticipated.
51.SB-2	The Notice of Intent (NOI) includes a list of significant components that require analysis. However, the NOI does not specifically require an analysis of how the project may contribute to climate change, an increase in greenhouse gas emissions, or affect carbon sequestration. For instance, there are no greenhouse gas emission estimates coinciding with the immediate construction and long-termmaintenance components of this project. Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org. MBCA is a 501©3 non-profit, community based, all volunteer organization Another example attends to desert land restoration alternatives versus land disturbance caused by solar PV production. Importantly, the current EIS guidelines are also lacking an analysis for the CO2 that has been captured and sequestered underground by natural phenomena and by native plant species for hundreds to thousands of years. (See attached article by Dr. Michael Allen)
51.SB-3	Lee Watson, an ecologist for the U.S. Energy Department’s Argonne National Laboratory, provides a warning: “We hear a lot that the impacts that unfold after construction are greater than originally anticipated.” He states that he and other biologists involved in assessing the potential environmental impact of energy projects do not always have enough data on what the long term ecological consequences of development might be.” (Gibbons.S., “Activists fear a new threat to biodiversityrenewable energy”. National Geographic, May 27, 2022.) BLM Director Tracy Stone-Manning states: “The BLM is deeply committed to conserving wildlife, ecosystems and imperiled species across the 245 million acres of public lands that we manage. By collaborating with diverse Tribal, state, federal, and local partners, we can achieve this important goal while also tackling climate change and delivering clean energy to American homes through responsibly-sited renewable energy projects.” (Gibbons.S., “Activists fear a new threat to biodiversityrenewable energy”. National Geographic, May 27, 2022.)
51.SB-4	There are several ways in which deserts store carbon. To start, desert plants store carbon in their biomass just as other plants do; through photosynthesis, plants take in CO2 from the air and convert that into tissue. Many desert plants also have important relationships with underground fungi: roots bond with these fungi in a mutually beneficial relationship. As part of this relationship, the plants transfer carbon to the mycorrhizae, which also store carbon. The majority of stored and sequestered carbon, however, is in soils. Plant or animal excretion and decomposition releases some carbon, which reacts with calcium in the desert soil to create calcium carbonate crystals. Since some desert plants’ roots grow to over a hundred feet, these crystals, called caliches, can be deep underground. Caliches build into larger chunks over time and create carbon sinks. Additionally, when the root fungi die, they leave behind their waxy coating, which aggregates and helps keep carbon in the soil. For their storage and sequestration potential, arid-semiarid soils are considered the third largest global pool of carbon. 2. The Importance of Desert Carbon Sinks: The most conclusive evidence of California desert carbon storage potential comes from a 10-year study in the Mojave Desert at the Nevada Desert Free-Air CO2 Enrichment Facility (NDFF). This study compared plots of desert with current CO2 levels to plots with projected 2050 CO2 levels. To do this, they piped extra CO2 over the plots. At the completion of the study, the researchers compared the carbon between the plots with current CO2 levels and those with projected CO2 levels. They found that the plots that received extra carbon were able to store significantly more carbon than those that received current carbon levels. This indicates that as atmospheric CO2 levels rise, deserts will have increased capacity to sequester in response to projected elevated atmospheric CO2. Deserts store 9.7% of California carbon and based on the NDFF experiment, and this amount may increase with climate change. A report by the National Parks Service shows that Death Valley and Joshua Tree National Parks and the Mojave National Preserve were within the top 10 park units with the highest annual net ecosystem carbon balance. https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=Greater+ecosystem+carbon+in+the+Mojave+Desert+after+10+years+exposure+to+elevated+CO2&btnG=

CID	Information Provided
51.SB-6	If NV Energy is unable or unwilling to attend to a revised EIS that requires analysis of the impacts associated with underground carbon capture and sequestration along the 474-mile project then the No Project Alternative must be adopted. *Note: this comment included an attachment entitled "Notes on Models of Carbon Dynamics for the California Deserts."*
53.HS-2	As promised, I've attached a project map for the Garnet Valley Wastewater System for your reference. We are planning to construct in the BLM utility corridor as well. We are still in an earlier stage of design and don't have the sewer alignments "set" yet, so any additional detailed information you can provide about Greenlink West would be appreciated. We want to be sure to plan around Greenlink West's proposed facilities. The construction period for the GVWWS Phase II ("Out of Valley" area on the attached map) is anticipated between Fall 2024 - December 2027. I would be glad to talk with you further about the wastewater project and any coordination questions or concerns you may have as we move forward with our respective projects. Thank you,(*Note: commenter attached a Garnet Valley Wastewater System planning map.)*
61.LC-2	Additionally, the corridor is also home to future distribution level power lines that must coexist with the other uses in the corridor--the Apex landowners hereby request also that NV Energy install poles that have the capability to hold not just the transmission level power of Project Greenlink, but also future distribution level power feeders to serve Apex. By including this betterment, NV Energy will be planning for the future growth of Apex--allowing future feeders to utilize existing poles and existing BLM ROWs instead of having to install new facilities. This accomplishes the good of the public as well, as Federal Lands will see less disturbance of the corridor by eliminating the need for new installation of poles or additional ROW area. If NV Energy needs developers in the area to pay the difference for the betterment to the poles, please contact us so that the money can be arranged.
73.KR-2	Portions of the project in southern Nevada will occur in the vicinity of two projects SNWA is planning to construct during the same timeframe: the Garnet Valley Water System Project and Garnet Valley Wastewater Project. The Garnet Valley Water System Project is being constructed to improve the existing regional water system and meet future demands in the Apex Industrial Park area. The Garnet Valley Wastewater Project will return treated wastewater from the Apex Industrial Park area to Lake Mead to extend the availability of water resources in the region through return-flow credits. Early and regular coordination between the BLM, NV Energy, and SNWA is essential for the success of all projects. The two Garnet Valley projects include a water pipeline, a wastewater pipeline, and associated facilities that would serve the Apex Industrial Park area in Clark County, Nevada. Based on the information and maps provided to SNWA by the BLM and available on the BLM's Greenlink West webpage, the proposed Greenlink West alignment would cross the proposed Garnet Valley Water System alignment once and the Garnet Valley Wastewater alignment twice. The Garnet Valley Water System crossing would occur on BLM land within the Lincoln County Conservation, Recreation, and Development Act of 2004 (LCCRDA) corridor along the section line between T19S, R62E, Section 12 and T19S, R63E, Section 07. An existing road that NV Energy identified as requiring improvements as part of the Greenlink Project also occurs in this area. The crossings of the Garnet Valley Wastewater Project would also occur on BLM land, near the intersection of Interstate 15 and State Route 93. One crossing would be located within the BLM Apex utility corridor in T18S, R63E, Section 14 and the other crossing approximately ¼ mile east within in the LCCRDA corridor in T18S, R63E, Section 13.

CID	General Questions/Statements
01.WC-5	The geotechnical drilling program is described at [https://eplanning.blm.gov/public_projects/2017141/200508108/20052849/250059032/GreenLink_NVN100849_GeotechWork.pdf]. We believe this program may have been conducted by drilling on active AGA claims. AGA was not informed of this activity and has questions about the coordination of activities and the disturbance created by the drilling.
31.SS-2	How much more power are industries like Google, Amazon and Tesla planning to use in ten years and 20 years and how does BLM plan to accommodate these future needs with public land?
31.SS-5	Is BLM interested in the 200 human rights violations filed against solar and wind facilities? There was a segment on NPR and an article on Grist.
41.J-1	The State's climate action plan calls for phasing out natural gas by 2040, so that theoretically means that those large power plants at Apex are not going to be in existence beyond 2040, does it make sense to be building this major transmission line to carry their power?
67.HW-2	At what point does NVE anticipate that they will accept interconnection requests at newly proposed substation locations?
70.CVW-1	Does anyone know what the rate increase will be for NV customers?
12.ES-6	What about the President's 30 x30 plan? Aren't we now thinking about minimizing impacts and conserving remaining wild lands? This is not a green project. It is a death link to viewshed, wildlife, and cultural resources.
19.JB-10	Since this transmission line originates at natural-gas fired generating plants near Apex, wouldn't it make more sense for NV Energy to build natural gas-fired plants near Reno-Sparks and much shorter transmission lines to the end users, and prevent the destruction of so much of remote Nevada.

CID	Solar/Renewable Energy Projects Comments/Statements
01.KE-10	It's going to result in connected actions that will result in huge solar projects. There's other power lines up there too.
01.RAM-6	Also, Greenlink West has generated great interest from the Solar Energy Industry resulting in utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for right of ways on tens of thousands of acres of public land in the Beatty area. The BLM should conduct a study on the long-term impacts this would have to the local economy. This could determine what factors are present which could be detrimental or productive to communities surrounded by solar farms and how these factors contribute to the overall economic health of these communities.
02.LC-2	Number two, this transmission line is based in natural gas. Greenlink is a euphemism. It's just going to power all -- it's not going to help climate change at all. It's going to power all of these big Silicon Valley high-tech Reno/Sparks factories. And then it will open up the heart of beautiful outback Nevada -- full of longhorn, wildflowers, desert tortoise, Joshua trees -- to solar energy development. And it's -- it's crushing me. I mean, I'm probably going to move out of Nevada.
02.SP-9	The Beatty Chamber of Commerce would like to go on record as opposing the SB Solar and Beatty Energy Center Solar Projects for this area and would like to request that they be put on “Low Priority Status”.
02.SP-10	Beatty has long been known as “The Scenic Gateway to Death Valley,” located 7 miles from the eastern entrance to the park. Thousands of visitors to the National Park stay in Beatty each year, they eat here, they sleep here, and they shop here.
02.SP-12	Beatty gives habitat to thousands of year-round resident birds & seasonal nestiing birds, regularly supporting 21 species that have been identified by NV Partners in Flight as conservation priorities. The heat produced by Solar Farms has been documented to kill birds.
02.SP-13	The areas proposed will skew the beautiful entrance to the spectacular Titus Canyon, a 27-mile one-way track that travels through the Grapevine Mountains. Thousands of people each year come to travel Titus Canyon and stay in Beatty. The Goldwell Open Air Museum and Rhyolite, the most photographed Ghost Town in the U.S., will be all but obliterated behind solar panels.
02.SP-14	Solar Farms use water, of which there is precious little in the desert.
02.SP-15	They [solar farms] create heat, killing plant and wildlife.
02.SP-16	The Beatty airport is a Designated Emergency Management airport and just received funds from the American Rescue Plan to keep jobs and small businesses open by doing improvements to the Beatty Airport. The proposed area of these solar projects are adjacent to the airport and will have a huge impact as it has been well documented that the updraft created by the heat off solar panels interferes with takeoff and landings of small aircraft and has caused crashes. This is a major concern.
02.SP-17	These projects will swallow up over 62,000 acres of land around the town of Beatty. Cutting off hundreds of miles of off-road and 4-wheel trails.
02.SP-20	The Chamber began a Radio Ad campaign in 2020 encouraging outdoor enthusiast to Enjoy the outdoors via biking, hiking, and off roading around Beatty, Big Dune and Rhyolite Ghost Town. The theme was “Open Spaces Bring Peace of Mind”. The radio advertising campaign range was from US HWY 395 in California to Salt Lake City. As you know, we are the Gateway to Death Valley and embrace the beauty that we see on our view shed entering the National Park, Titus Canyon, Rhyolite Ghost Town, the Oasis Valley and the surrounding areas around Beatty. The Chamber of Commerce also received thousands of dollars in Care Grants via Travel Nevada ie. “The Nevada Commission on Tourism” for Billboard Ads encouraging people to enjoy our scenic outdoors. We carried the theme “Open Spaces Bring Peace of Mind” onto our web site as well at beatty.nevada. org , encouraging off roading, biking the Spicer Trails, riding the Big Dune, exploring the Historic Rhyolite Ghost Town and Goldwell Open Air Museum. All of our efforts to encourage people to come to Beatty will be lost if the solar farms consume thousands of acres around us as there will be no where to off road, ride bikes or hike the scenic outdoors and this will be a negative impact on our tourism industry as our town survives on tourism dollars. In essence the town will dry up. Just FYI… Over a million people toured Rhyolite in 2020 and 2021, this will change as the terrain and beauty are scarred.
02.SP-22	In 2007 the room revenue was $1.4 million. The Chamber of Commerce has strived each year to apply for advertising grants through the Nevada Commission on Tourism to promote the town of Beatty. I am proud to announce that in 2020 Beatty collected approximately $3.5 million dollars in room and RV rental revenue for the year and $4.2 million in 2019, which does not even account for the food, fuel and gift purchases which we estimate was another $ 5 Million per year for a total of $9.2 million tourism revenue to the town of Beatty. This is a huge increase from 2007 when the total room/rv space income yearly was $1.4 million with a total tourism estimated revenue of $4.4 million. As you can tell it increased yearly and 12 years later we were reaping the rewards with an increase of $4.8 million in revenue to our town per year. We contribute this increase to our advertising efforts of the town through magazine ads, brochure distribution throughout California and Nevada, radio ads, billboard ads and our web site. The Cares Grant allowed us to put billboards within a 100 mile radius which wasn’t available in years past. This was a one time opportunity and we took advantage of it. Loss of outdoor recreation will be a NEGATIVE IMPACT to our businesses and the entities that operate off of room tax such as BGID (Parks and Rec), the Beatty Museum and the Chamber of Commerce. Please don’t change the beauty of our town. Putting Solar Farms within 25 miles of Beatty would effectively kill the economy of Beatty. Besides ruining the view shed, they will put our restaurants and lodgings out of business.
02.SP-23	If the SB Solar Project and the Beatty Energy Center projects are to be located in Nevada, we implore you to consider another location, remote, at least 25 miles from a town and require that the energy produced benefits our state.
03.JB-2	And the whole state of Nevada will be a dust bowl if that power line goes through and the 230 square miles of solar projects that are planned along that line are built.
03.JB-4	They also -- just in the last week, I read that Governor Newsom decided, well, gee, maybe we shouldn't shut down the nuclear plant, because they know wind and solar can't power the state. Likewise, they're retooling a bunch of their natural gas plants. Why? So the lights will stay on. And where will the battery power come from? We'll have to bulldoze the rest of the state that isn't used for solar for living. And I've lived in Nevada since 1962. It's nice to have some places that aren't industrially developed. And again, I've been a Nevada Power customer since then, and the rates are going up anyway. We cannot possibly afford to shove that off on all of the rate payers.
04.BTAB-6	Also, Greenlink West has generated great interest from the Solar Energy Industry resulting in utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for right of ways on tens of thousands of acres of public land in the Beatty area. The BLM should conduct a study on the long-term impacts this would have to the local economy. This could determine what factors are present which could be detrimental or productive to communities surrounded by solar farms and how these factors contribute to the overall economic health of these communities.
04.CL-1	I would like to draw your attention to the Beatty Nevada area and Boulevard associates applications for solar sites in our area . I have not heard one pro solar site person in this small town. This area is limited one the east by the Nellis range and the Atomic test site. On the west side by Death Valley National Monument. An approximately seventeen mile wide strip . This is a scenic and historic area . There are huge visual impacts in the areas proposed. The entire north of Amargosa valley is seen from the mountains and hills near Beatty and historic Rhyolite . Please have the solar sites located out of sight and in remote , little used areas. We would rather not have the green link power line pass through our narrow corridor.....the solar sites are unacceptable .

CID	Solar/Renewable Energy Projects Comments/Statements
08.JH-1	I've been informed that this EIS will only look at this transmission line corridor itself and not look at any of the connective actions of some 200 -- over 200 square miles of potential solar farms. It's my understanding that NEPA requires that you look at connected actions, aswell as the principal action. And I think in this -- in this case, any court would ask, what would a reasonable person say when looking at 200 and some square miles of proposed solar farms that would hook into this? Is that a connected action? And clearly it is. And if you don't pay attention to that, you'll be subject to lawsuits. And that will tie you up in time and cost money. So I would strongly suggest that you expand your EIS to actually look at the impact of all of the solar farms for which the BLM has received applications. I think that's critical to do that.
09.EH-4	The project would stimulate further "renewable energy" projects that will require the production of components that would increase the demand for rare earth elements. Such demand would mean increased mining and further environmental damages.
12.ES-1	I am extremely opposed to the "Greenlink" transmission line project. I frequently bird and hike and sightsee in Nevada. The project would have devastating impacts to pronghorn, birds, cultural resources, and many view sheds and species I dearly love.
12.ES-7	Cumulative impacts from both the transmission line and the (non-rooftop) industrial solar plants this will spawn must be analyzed in its entirety.
13.DS-10	I think that this Greenlink -- again, the solar, that's not what this is about. But those things are going to affect us drastically.And I think if it happens out here, I think that we should go to these groups and ask for compensation. I'll speak about the elephant in the room. That's something that we can weigh, what we might lose if we lose our access to our public lands, or at least the viewscapes and the freedom that people feel when they're coming here. And we can take that compensation and make it a partnership if it has to happen.
13.KE-4	This badly-planned transmission line would also open up Amargosa Valley and other remote Nevada basins to widespread and uncontrolled solar development, on deserts that are a hotspot for Mojave desert tortoise, burrowing owls and desert kit foxes.
13.KE-5	During BLM meetings we raised the concerns about the many proposed utility-scale solar applications needing to be reviewed as connected actions to the Greenlink proposal.
13.KE-14 Part 1	Please review the associated solar applications for Greenlink West as "Connected Actions". Under the Code of Federal Regulations, connected actions are actions that are directly a result of a specific proposed action. (1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification. 40 CFR § 1508.25 - Scope. | CFR | US Law | LII / Legal Information Institute (cornell.edu) According to BLM: Analysis of Connected Actions under the National Environmental Policy Act | Bureau of Land Management (blm.gov) (see BLM 2018). The following paragraphs revise BLM NEPA Handbook (H-1790-1) Section 6.5.2.1 (page numbers 45-48): Connected actions are those proposed Federal actions that are “closely related” and “should be discussed” in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable. Because there are nearly 230 square miles of public lands solar energy applications associated with the Greenlink West Transmission Project, they are connected actions to the upcoming draft EIS. The Greenlink West Project would need to build three major substations designed to connect several thousand acres of large-scale solar on to the grid. With a few exceptions, all the SF-299 applications for solar energy in the area say they must hook into the Amargosa, Esmeralda or Ft. Churchill Substations - all being built for the Greenlink West Transmission Project.
13.KE-14 Part 2	These solar applications would not be pouring into the BLM offices if a large high-voltage new transmission project was not being actively proposed and reviewed. Otherwise, the remote basins have no transmission infrastructure capable of carrying any utility-scale solar generation to load centers. Each of these large-scale solar project applications will need an EIS and would not proceed unless Greenlink West is built. None of the Solar projects have made NEPA, but they are all submitted as SF-299 applications for the BLM. Nothing has been approved or really looked at in detail yet. According to the developers, they are all feasible because they meet the Variance requirements and could plug into the new transmission line. Since the line would have associated substations built with it, the projects are feasible to hook into it. We do not think they are feasible over the resource damage they would cause. Are the public lands solar projects not feasible but for the transmission project? Or are those projects already approved and will go in regardless of the transmission project? If it’s the former it’s a connected action. But the Purpose & Need statement itself doesn’t determine whether projects are connected to the proposed action. BLM’s NEPA handbook identifies the relevant factors, and there’s nothing in that excerpt about Purpose & Need statements. The EIS should fully review all connected and cumulative impacts that would result from a Record of Decision issued to approve Greenlink West.
13.PG-13	Construction of the Greenlink West transmission line and designation of a new right-of-way corridor will be a catalyst for new renewable energy development, particularly large utility-scale solar projects, and future linear disturbances. TNC is aware of numerous solar energy project applications being submitted for areas directly adjacent to the proposed Greenlink West substations. This response from the solar industry is consistent with the objectives identified in NV Energy’s Plan of Development. Similarly, the final Greenlink West alignment and associated utility corridor is likely to influence the alignment of future energy and infrastructure projects, such as the planned Interstate 11 transportation route.
15.CL-2	I am against the Amargosa valley being used as a solar farm. The whole valley is visible from the mountains near Beatty Nevada...This use of the Amargosa desert for Soalr generation would deleteriously impact the area..There are plenty of areas for solar which would not be disturbing to the residents.
16.JB-10	The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will harm wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and panoramas. Many 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas. That is destructive to the land, and all plans and animals who depend on it to live.

CID	Solar/Renewable Energy Projects Comments/Statements
16.KE-3	Finally, the solar project applications associated with this project are big, and we know that the project won't be built out to the full extent of the application. But if they're half the size of those applications, they're going to be 3- to 4,000 acres apiece. Many of them are south of Beatty. Some of themare near Amargosa Valley. And we had a little bit of debate last night whether or not the review for the power line that talks about that would be called connected action. I looked it up today, and I think the draft EIS should at least talk about the impact. Because all of the applications mention Greenlink and they mention the substation, and they essentially couldn't happen without it. There's just a couple of other applications that have other power lines. And so this EIS really does open up Pandora's box of all of these projects that could really damage the economy of the town if they're built in the distance and the close proximity that some of these applicants want them. And because they don't have any other options, it's legal to do that. I've seen the BLM do that. There was a private land storage hydro project, and they actually reviewed the impact of the power lines. But they also talked about how much water it would use, and that was other agencies' jurisdictions. But I think because there is so much land being speculated for -- from these solar applications, that the impact would be irreversible and very negative to the community, because they just don't give back to the community. They should be thoroughly reviewed in this environmental impact statement.
17.LC-2	So we're just along the line. And they call it green, because then they'll hook up all of these giant utility solar projects. So it's not benefiting us.
18.JB-3	The line is only one small part of a much bigger plan despite your insistence that you are not planning, only responding. It will enable the construction of many utility-scale solar projects on the high-value public lands of western Nevada, rather than on parking lots, rooftops, and already damaged lands. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources.
19.JB-4	The transmission line will destroy so much of Nevada's wide open and unindustrialized public lands. By opening huge tracts of undisturbed desert lands to industrialization, as the true purpose of this proposed project really is, the health of all Nevadans will be impacted. Drive through Ivanpah Valley on a windy day to witness the unrelenting dust storms resulting from so much desert being bladed and/or disturbed to install solar PV panels. If not convinced, go to Boulder City and see the massive solar developments there, as well as the massive dust storms in Eldorado Valley. The dust is anything but harmless. People throughout Clark County are now having their health impacted by all of the particulate in the air on a windy day. The Eldorado Valley dust storms also carry the spores of Valley Fever (coccidioidomycosis, a fungal lung infection), plus naturally occurring asbestos which causes mesothelioma cancer. Still not convinced: Drive northeast of Las Vegas to the Apex Area, where thousands of acres of land are disturbed for even more solar projects. Check back with the Moapa Piute Tribe in a few years. The health issues from all the dust will no doubt be just as deadly, or even more deadly, than the former methods of generation in the area. Fast forward a few more years, when the massive battery banks necessary to store the solar power for when it is needed on the grid, start catching on fire. The smoke from battery fires is even more deadly than the dust. Plus, much of the power generated by the PV panels will be needed to cool the massive battery banks, which over-heat even in much cooler areas of the California coastline. If even one-half of the planned 230 square miles of solar projects proposed on public lands between Las Vegas and Reno are built, the entire region will be subject to massive dust storms and the resu lting health issues.
19.JB-5	Tourism has been and will continue to be the economic driver for the state of Nevada. If all the wide-open spaces of the state are bulldozed for solar, and the viewshed is permanently damaged by solar panels and transmission lines, tourism to much of the state will be impacted negatively.
19.JB-8	The additional destruction of the natural environment, including incalculable harm to rare flora and fauna, including Joshua trees, desert tortoise, sage grouse, desert bighorn and pronghorn antelope cannot be mitigated in any manner. Studies show that solar projects in Wyoming are already negatively impacting migration routes for the pronghorn antelope.
20.LC-6	Rough Hat Nye Solar Project developer Candela from Spain mentioned at a Nye County public meeting that they were looking to link to Greenlink to get PPA from Silicon Valley corporations as possibility.
20.LC-7	The developer of Rough Hat Nye Solar Project proposed linking to Greenlink West in a county public meeting. So these are good questions.
20.LC-8	Solar developers we have talked to are looking to link Pahrump Valley proposed solar projects into Greenlink West. Will Pahrump loop GridLiance line hook into Greenlink?
20.LC-9	Thank you Greg, that confirms that Rough Hat Nye Solar Project generation will go to California.
23.JH-2	This project is a very large and expensive project with many large scale impacts. In order to understand the magnitude of the impacts it is imperative that all the connected actions be included in the analysis of the environmental impacts. The gross area of connected actions (the solar farms and associated transmission lines) exceeds the area of disturbance of the Greenlink Line itself by at least an order of magnitude so it has to be included in the EIS.
23.PD-5	Meanwhile, we have a solar PEIS that was supposed to concentrate development within Solar Energy Zones, which does not appear to be factoring in to the Greenlink project. So, it seems pretty clear that since this is going to be a plan amendment-level decision that it should be the compete plan amendment and that it should analyze where the solar energy is going to go. I would direct you toward the DRECP in California where landscape-level decisions were made about where to site projects, at least partially based on transmission, and its reduced conflict over those projects. Right now, there's this proliferation of these proposed solar applications up and down the Greenlink line and they are going to be dealt with piecemeal, on a one-by-one basis and that is just not a way to ensure the best resources are being developed. So, is there going to be some sort of connected action analysis beyond just the cumulative impacts? Is this going to be part of the decision-making on Greenlink?

CID	Solar/Renewable Energy Projects Comments/Statements
25.KB-1	Utility scale solar energy developers' corporations' presentations and documentation signing stages for permitting of their laddered Gemini and Yellow Pine projects, have moved forwards successfully on schedule. We voters' (for saving the remaining Last Stand Mojave Desert), were misdirected into assisting, (HB 447?)(Nevada SB 358?) in this string of machinations. Green, used against - itself. - While that was happening - required documentation (professionally presented insights and USGS-, USFWS-level research) raising valid questions, warnings about, and reasonably opposing, the same permitting went missing after being correctly submitted as "public input": Bigger Busyness, farther out, GreenLink West, had to grow, unhindered by problem information, especially facts. Can't help what that looks like. If there was a movie being made about speculative investor-driven wrong siting of solar energy development (especially since 2014-20s) onto Nevada's remaining biological Last Stand wildlands, this Nevada-style serial filing problem might be amusing, Solzhenitsyn-like, in the story. As is, we who oppose utility scale extractive industry infrastructure on Last Stand wildlands - on principle - would like to send all our serious, not silly, questions and public input to another, higher, more informed authority, for their review, before anyone's permits are OK'd by the BLM. It's possible that, even with FLPMA helpers, the permits are already not going to be issued. Or won't be issued until the proposed tech & engineering are finally discarded, and modular microgrid "distributed" solar is taking over. What is the benefit to the corporations continuing to apply for permits? Is just symbolically holding the land ROWs 2 years at a time, going to be profitable enough for them? Will Big Realty be trying to get Roads, then Water? Space? They know the ways. What will the desert be like for them when the 1872 Mining Laws go? If preservation of the Mojave, has been already agreed upon, was never threatened, then - please say so, publicly. There are already many very good reasons not to allow utility scale infrastructure into wilderness environments, and they are good enough. Please be free to say so. Not Here, to extractive industry Busyness (save them time). Save us time and keep safe, what is irretrievable and irreplaceable. On Last Stand biological refugia, remove enticing Uncertainties: replace Busyness, with No Threat of Busyness. Somebody has to be the parent, in this.
25.TR-2	The (earlier) speaker thinks you're talking about the Rough Hat solar project in Pahrump. Rough Hat is solar generation. Greenlink is transmission.
26.PG-4	And we also want to note that The Nature Conservancy sees an opportunity for tapping into some potential for development of former mine lands, such as the Anaconda Mine near Yerington. We see this, since the site is being remediated, we see it as an excellent example of siting new renewable energy on a previously disturbed site. And that project could tap into the line.
29.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project (see Figure 1. Map below). The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties. The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.
29.RL-2	So I agree with everybody else, that we understand the need for sustainable energy and to de-carbonize this country. The Sierra Club believes that community solar and creating solar energy in the areas where needing it and using it would be a much better use of our time and money. So let's put the solar energy facilities on rooftops and have everybody have solar energy on their houses. That way, you don't have to have a grid. You have the electricity where it's needed, it's being used where it's being created. It makes a much greater sense. We don't have to worry about transmitting electricity to other states. Particularly if they have the same system in place. So we think there's a much smarter way to develop this de-carbonization process than making a lot of companies who want to create solar energy facilities along these corridors and disturb undisturbed wildlife habitat and make them money and make them rich. We don't believe that's a valuable use of our time, effort, and money. So we'd much rather see the solar energy development in places that are already disturbed and where it's being used.
29.RL-2	So I agree with everybody else, that we understand the need for sustainable energy and to de-carbonize this country. The Sierra Club believes that community solar and creating solar energy in the areas where needing it and using it would be a much better use of our time and money. So let's put the solar energy facilities on rooftops and have everybody have solar energy on their houses. That way, you don't have to have a grid. You have the electricity where it's needed, it's being used where it's being created. It makes a much greater sense. We don't have to worry about transmitting electricity to other states. Particularly if they have the same system in place. So we think there's a much smarter way to develop this de-carbonization process than making a lot of companies who want to create solar energy facilities along these corridors and disturb undisturbed wildlife habitat and make them money and make them rich. We don't believe that's a valuable use of our time, effort, and money. So we'd much rather see the solar energy development in places that are already disturbed and where it's being used.
30.JB-1	Since this electricity is headed north to industry, have you required all those industries you have identified who will benefit to cover every inch of their parking lots, shipping areas, and rooftops with solar? That could generate quite a bit of electricity.
30.MM-3	One is the potential impact on air quality in these -- we had a dust storm here a few weeks ago and it caused tremendous dust clouds over developed areas of Nevada but natural surfaces were preserved. The dust issue has health issues. There are issues like Valley Fever, which has been found in Nevada. There's naturally occurring asbestos, asbestos formed minerals in soils across much of Nevada. And so these things all need to be tied in. But to isolate the corridor itself without considering whole projects, I think, is problematic. And sells Nevada short in terms of its public lands.
31.MG-2	I'm quite concerned about the -- in general, about a very specific issue, and that are the biological soil crusts that re found. And these -- they do many functions. Hold the soil in place, transfer nitrogen to thesoil and plants. But they sequester carbon. And there needs to be very careful and detailed analysis about what's there right now. And not in terms of deciding here to locate the whole project itself, but we have to know in detail what the -- biological 6 soil crusts out there. I took a BLM -- I wasn't a BLM member, but I took a biological soil crust in Nevada, or in Las Vegas about eight or nine years ago, which was put on by Bureau of Land Management. And they had Roger Rosentreter were there, who is a retired BLM for Idaho. And his cause is -- that there -- a number of BLM people there, has to do with the fact that you can manage the range to be consistent but not disturbing biological soil crust. But you can't -- but we didn't go into it then, but there's serious problems with -- as we can see from the developments already. Solar, disturbing the biological soil crusts. So that needs immediate attention, I think things that go into designing the route in the first place. Thank you for my getting here.
31.SS-1	They are all connected [*regarding solar projects and GLWP].*

CID	Solar/Renewable Energy Projects Comments/Statements
32.KK-3	Second, the proposed Greenlinks west project would have huge impacts from its 469 miles of new transmission lines and substations. The list of impacts would include: Tule Springs Fossil Beds National Monument impacts on ice age fossils, wildlife and Native American cultural sites Mojave and Great Basin habitat for desert tortoise, Bi-state Sage grouse [ravens use raised structures to perch and prey on tortoise and grouse], pronghorn antelope, desert bighorn and Joshua trees visual impacts on places I and many others like to visit because of their scenic beauty -- DNWR, Mount Charleston and the Spring Mountains, and Walker Lake. The BLM would need to downgrade the Visual Resource Management Class of large parts of the Great Basin and Mojave Deserts. any new industrial scale solar plants on public land would have significant negative effects on water, air quality and scenic value.
33.BC-1	Will you be having a similar meeting as this but addressing the solar power projects in Nye County?
33.BC-2	Please keep me in the contact loop regarding Solar panels in and near Pahrump/Nye Co.
35.MC-11	The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources.
38.1.MW-2	I need not go on about the toxic elements for solar panels and batteries that will need to be mined, nor the fact that what carbon is saved from the power generation of these arrays will be offset by the destruction of desert vegetation and loss of atmospheric uptake in the absence of said flora, nor the effect on wildlife and the likely permanent dustbowl that will be unleashed in the process.
38.1.MW-3	I have no doubt BLM and these parasite companies know all too well the truth in all this. Please let our wilderness stay wilderness Lastly I must say shame on you all for for Yellow Pine. I am disgusted everytime I drive by and see what you have all done. May that be the last to ever be developed. If the powers that shouldn't be insist on dragging everyone into a green hell then build that crap on roofs and empty lots and make the power companies buy the excess back. You have Apex industrial sacrifice zone already, NO MORE. No more boulders or primms or searchlights. No moreMoapas or Nellis or silverstates. No more eagle shadow mountain or crescent dunes. No more yellow pines or sunshine valleys. No Gemini, no copper rays, no rough hats. No busted butte, chill sun, Gold dust, sawtooth. NO GREENLINKS.
39.MG-2	If we are building a transmission line from Washoe County to Clark County, and at the beginning you said the power would not necessarily be generated in Nevada (yet it is conspicuously located on top of where a lot of the solar fields are). Is this going to eventually be sucking in some of the energy created from those sources? I cant imagine Reno is sending electricity to Las Vegas, and vice-versa. My concern is that it was not going to be used to send renewable energy, but that appears to not be the case.
40.MM-1	The proposed project envisioned as "green" development with multiple environmental benefits. Unfortunately, the proposal fails to address significant issues tarnish the "green". While capturing energy from the sun is reduces demand on carbon-based fuels, that green component is more than offset by the accompanying environmental damage that will occur with the proposed project and the connected actions of widespread solar development in undeveloped regions of Nevada.The connected facilities will generate energy far in excess of Nevada's needs, with the excess power intended for sale on the energy grid at market prices. Greenlink is a subsidized connection between corporate power generating facilities and distant cities that will consume most of the power generated in Nevada's open spaces. Few of the profits generated by these solar developments will remain in Nevada while Nevada's rate payers will foot the bill for overbuilt power grid. As it is, existing solar power facilities in the region have been unable operate at profit.
43.AT-1	Are there any studies done to identify renewable development hotspots. If yes, were the new substations sites planned based on these studies?
44.H-1	Why not generate the electricity closer to the demand near Reno? All those huge buildings in the USA Parkway complex should be covered in solar panels. In the most recent Google Earth image they are not. There are about 4,000 acres of rooftops, parking lots, and disturbed ground just in that area.
44.H-3	Will this transmission line still be necessary if the proposed solar farms along the route are not built?
47.RR-10	The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, paleontological and archeological resources, Indigenous and tribal values, groundwater, and visual resources.
48.RO-1	I chose Beatty as my home in 1963 and I would not like ot see power poles or mass solar panels in site or having electric effecting the body. We have a piece of Death Valley. We don't live in Death Valley, but we are in Death Valley country. Beatty is in a beautiful area. To protect Death Valley, to safeguard it's area: picking up a rock is a crime.
49.HA-1	If there are no more questions: can you explain why the transmission line is not planned in coordination with sites of new (solar, geothermal, wind) energy development?
50.KE-6	Can you all write a letter about this low priority status [of solar facilities]?
51.EG-3	The Greenlink is driving all the interest to site solar farms near Beatty which has a lot or resource conflicts which gets to the original problem, no one applied in the SEZ because they want to be closer to the lines because it's cheaper. I know this is Greenlink but there should be something so everyone isn't applying to the same area.
51.EG-4	I want to be clear, did you just say the projects around Beatty have been given a low-priority status? *[Attendee]* added, including Sarcobatus Flat north of Beatty?
51.EG-6	There is a list of [solar] projects on the BLM website, but it is hard to find, can it be put somewhere easier to find?
52.SN-5	The area offers unparalleled and unencumbered opportunities to experience, explore, and photograph the astronomical wonders from the North Star to the southern horizon in one of the darkest places in America. The proposed Greenlink Transmission line and Esmeralda Substation is proposed to be built on and through this area and the associated solar developments will take a sizable bite out of these unique and fragile lands and surround the remaining natural lands with massive industrial photovoltaic plants. The dark skies this area is known for will be significantly impacted. The recreational, astrotourism, and natural visual resources of this entire area will be forever degraded and will preclude quality recreational development and enjoyment.

CID	Solar/Renewable Energy Projects Comments/Statements
52.SN-10	Finally, we could not find any studies on or opportunities for public comment on the "Esmeralda SEZ." Three of the project descriptions for the "Esmeralda SEZ" default to the October 2012 Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States, which state that the project sites are located within a variance area for solar power generation under the document. Although 43 CFR Parts 2800 and 2880 allows for variance areas on a case-by-case basis, each case requires planning to designate particular SEZ sites. For the "Esmeralda SEZ," the BLM/Greenlink is obliged to analyze the impacts of the proposal and describe why the Greenlink Transmission corridor is bypassing and not utilizing the Millers SEZ and instead is developing the new Esmeralda SEZ. When asked whether or not the EIS for the Greenlink Power Transmission line should include the proposed new SEZs along the transmission route, Greg Helseth replied that it should not be considered at this time, because the transmission corridor and the proposed SEZs are not linked actions. He said that the Greenlink West Transmission line has planned substations in locations of two substantial proposed SEZs (Esmeralda SEZ-total 61,463 acres of public lands; Sarcobatus SEZ-total 10,000 acres of public lands). These SEZs would not be developed without the transmission line and the placement of the substations at the proposed SEZ locations. Clearly, the Greenlink Transmission Line will enable these SEZs to be developed and the SEZs should be considered connected actions to the transmission line. Every applicant for these SEZs lists the Greenlink West Transmission system and planned Substations as necessary for completion of their projects within their Project Descriptions (Sawtooth Energy Center; Esmeralda Solar Project; Smoky Valley Solar; Gold Dust Solar; NVLOC Solar Energy; and Rhyolite Ridge Solar 1 & 2). The Greenlink Transmission Line and substations, and the proposed solar developments are connected actions, and their combined cumulative impacts must be evaluated within the same EIS. This is especially critical since the BLM's land management planning documents are decades out of date. FNW REQUEST: Analyze the cumulative impacts, past, present, and future, of the Greenlink project and all other solar energy projects in the state of Nevada.
53.WB-2	Proposed solar developments of the Greenlink Projects will completely cover the Northern Amargosa Valley Groundwater Basin, from the river's headwaters northwest of Beatty, Nevada, to the California-Nevada state line. Solar development along the US95-corridor, from Reno to Las Vegas, will not reduce carbon emissions significantly enough to counteract the global warming. The arguments used to promote the GWTP are the same arguments used to more than sixty years ago to develop hydroelectric projects along the Colorado River. We can wrap the planet in solar panels and transmission lines, but unless we reduce our consumption, this will make little difference. Further south, Greenlink proposes to connect to the natural gas plants at Apex near the Harry Allen Substation, not just for wind and solar energy…Greenlink in part, is a dirty fossil fuel line.
53.WB-12	Greenlink will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources.
54.KL-2	How will we find the priorities list when you release it? *[Attendee]* added is there a list of all the applications with their size and location, dates for comments and status somewhere?
54.SS-1	The Greenlink West environmental review is not taking into account any environmental impacts of the 5000 MW of energy it would "unlock" (BLM.gov). This is a problem because the review should include projects that are closely associated with it. As it is, this environmental review is happening in somewhat of a void. It is only taking into account the path of the transmission line itself.
54.SS-2	As someone who is bearing witness to the total destruction at the Yellow Pine Solar site in the south Pahrump Valley, and to the transmission tie-in Nextera and Kiewet constructed to connect the Yellow Pine electricity to the existing transmission line along 160, I can attest to the fact that these kinds of photovoltaic solar projects are a form of ecocide. The mowing technique promoted by the BLM is a total sham; the soils and vegetation are being completely destroyed, and we are losing the carbon sequestration of this natural ecosystem. The GreenLink West transmission line would open the floodgates for this kind of sickening disregard for natural ecosystems all over the Great Basin. Ironically, losing the carbon storage of our arid lands could potentially off-set the carbon dioxide saved by not burning fossil fuels. At the same time, producing the silicone from which the solar panels are made requires burning wood or coal as well, so they were never a carbon-free source of energy to begin with. The transmission line itself is also a form of ecocide. I watched what they did at the Yellow Pine tie-in: they grated the entire path, removing all yucca, creosote, and desert pavement. Transmission lines are also fire hazards and they lose six percent of the electricity they carry. This is why I started the campaign to Move Solar To The City (change.org/MoveSolarToTheCity), which would entail using the 2.5 million acres of exposed strip-mall parking lots for solar-shade canopies. This would allow us to preserve carbonsequestering natural ecosystems, and eliminate the need for transmission lines that lose 6 percent of electricity and create fire hazards.Thank you for destroying our public lands. I know it is not your fault and you just have to do whatever the DOI says, and they have to do whatever the industry lobbyists pay them to do.
56.HG-1	Isn't it premature to build the transmission line before the solar farms it is intended to connect have passed environmental review?
56.HG-2	None of these large solar plants on undisturbed desert ecosystems make sense. Put the panels on and around the Tesla factory and bit coin miners closer to the demand. They don't have their rooftops and parking lots covered yet.
56.HG-3	Is there a list of all the applications with their size and location, dates for comments and status somewhere?
57.PD-1	There is a lot of interest in this line because it is going to carry this renewable energy, but because there is no planning going on for these projects, they are threatening species with extinction. This is happening because the BLM is taking a hands-off approach and letting the market decide where to build solar projects and it is leading to increased conflicts and permitting times. There is no systematic analysis as to where these projects are appropriate. We provide input, BLM doesn't listen. Then we have to provide input in court.
62.CB-1	I support the urgent need to transition away from fossil fuels and toward clean, renewable, and sustainable energy sources like solar and wind. The climate crisis is real and getting worse. But the extinction crisis is also real and getting worse. We must plan better to help solve both.of these connected crises. For solar, we should not sacrifice pristine landscapes rich in wildlife when abundant distributed solar is possible on existing and future roofs.
64.KF-1	One of the stated purposes of this transmission line is to provide more access to solar resources, and a number of solar projects have applied to BLM for rights of way near the proposed transmission line. These solar projects are dependent on the transmission line and appear to be connected actions under NEPA. Will those solar projects be analyzed in the same NEPA document with the transmission line?
64.KF-2	Solar developers like to site their projects near substations, so the BLM land near substations can be expected to get solar applications, essentially steering it into certain locations. Will BLM/NV Energy take the possibility of future solar development near substations into consideration as they site and analyze the substations?
64.KF-4	My question was skipped. What I was trying to get at was that as substations are sited and analyzed, is the BLM or NV Energy taking into account the fact that we may have those energy projects coming in order to avoid steering development into areas of higher sensitivity.

CID	Solar/Renewable Energy Projects Comments/Statements
68.JK-9	In addition, renewable energy projects, specifically for solar energy, are being proposed at an accelerated rate within the proposed Greenlink West Transmission project corridor. The Department has been approached by several energy developers wishing to discuss potential impacts to wildlife that may result from energy projects along the corridors, and it is apparent these types of projects are being explored as a direct result of the Greenlink West Transmission project. With increased solar energy development, there have already been concerns of capacity issues regarding the existing and proposed Greenlink West transmission lines, and the ability to support the current and proposed solar facilities, with additional lines potentially necessary to address capacity.
68.MM-1	Are the substations required for solar fields to connect to Greenlink? In other words, do the substations guide where solar plants can be constructed?
68.MM-3	Returning to my question about substation locations, is it realistic to separate the potential consequence of connecting developments resulting from selection of the Greenlink alignment and the selection of substation sites?
69.TOB-2	Does the BLM have to accept all of the [renewable energy] projects that are submitted?
69.TOB-3	How many 800-megawatt solar energy plants can the Greenlink line capacity support?
70.RS-2	While I strongly support the development of clean, renewable energy sources, I do not believe that we must destroy relatively pristine public lands and resources to do so. Distributed solar on rooftops should be maximized before any projects in remote areas are considered.
70.RS-19	The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources.
72.TD-4	Sierra Club is also concerned these corridors will contribute to extensive habitat disturbance that is not being considered in the particular environmental analysis. We understand the Bureau of Land Management has numerous applications for solar developments along this corridor that will contribute to thousands of acres of disturbance on presently intact wildlife habitat.
74.PG-16	In accordance with 40 CFR 1508.8, we respectfully request the BLM evaluate the indirect impacts of the project in promoting new solar energy development; these connected actions would also have potential environment effects that should be disclosed in this EIS. Consistent with recent Council on Environmental Quality guidance for evaluating cumulative impacts, we ask the BLM to conduct a thorough evaluation of any pending right-of-way applications associated with new energy generation along the Greenlink West line should be disclosed. These are reasonably foreseeable future actions connected with the Greenlink West project, which require complete indirect and cumulative effects analyses in the EIS. Such analysis is critical for fully disclosing the environmental consequences of this project.
75.UNK-1	I strongly support the development of clean, renewable energy sources like solar and wind to speed the transition away from polluting fossil fuels.
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).
81.CO-17	The NPS serves as a NEPA Cooperating Agency for the Greenlink West Project and looks forward to effective collaboration and cooperation with the BLM. Issue: The Federal Register Notice initiating the scoping process for this project was published on April 29, 2022. Recent changes to federal NEPA regulations took effect May 20, 2022. The "Phase One" final rule reinstated three key provisions to (1) Purpose and Need, (2) Agency NEPA Procedures, and (3) Definition of "Effects" or "Impacts". Recommendation: The NPS recommends that the BLM clarify how Phase I final rule may be incorporated into the NEPA process for the Greenlink West project. The NPS supports a redefinition of the Purpose and Need according to the revised regulations, to consider the BLM's purpose and need and range of reasonable alternatives, particularly around Tule Springs Fossil Beds NM. A robust and comprehensive analysis and discussion on the Cumulative Effects of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, particularly around Death Valley NP, should also be included in the EIS. Overall, due to the level of development interest (i.e., solar, transmission, gold and lithium mining) in the Amargosa Valley, the NPS recommends the BLM collaborate with other agencies and partners on landscape level analysis and planning of the Nevada desert to identify areas most appropriate for development and to minimize impacts to sensitive resources.

CID	Airspace Comments/Statements
51.EG-1	South of Beatty will have the same airspace issues with the Air Force and the Beatty Airport. Also, it seems disingenuous that NV Energy is part of the team too and that it is a done-deal, and we are just going through the motions because Reno needs more energy.

CID	Social-Economic/Environmental Justice Comments/Statements
01.KE-2	The other thing is we have got an alternative that goes over -- right over Bailey's Hot Springs. And it's not only near where people live, but it's the Shoshone consider that a culture resource. You guys are not talking to people. And if you are, you're not telling us you're talking to those people.
01-KE-4	This project is going to impact a lot of communities.
01.KE-11	It's going to impact the local economy, and I don't see anything being offered.
01.KE-12	For those properties that it's going to go near, you haven't even talked to the landowners. You tried to reach out to one, and they didn't even respond.
01.RAM-4	We have been told that construction of this project in our area will take approximately 3 years to complete. Maintaining the access and connectivity of our recreational routes and the safety of users must be considered and addressed. The Town of Beatty, Beatty Chamber of Commerce , Storm-OV, the Nevada Commission on Tourism, Nevada BLM, and Nevada State Parks have invested significantly in Beatty's eco -tourism economy over the past ten years. It is critical that we retain the ability to attract recreators to our community and that their experience is not denigrated during the construction of this project.
01.RAM-6	Also, Greenlink West has generated great interest from the Solar Energy Industry resulting in utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for right of ways on tens of thousands of acres of public land in the Beatty area. The BLM should conduct a study on the long-term impacts this would have to the local economy. This could determine what factors are present which could be detrimental or productive to communities surrounded by solar farms and how these factors contribute to the overall economic health of these communities.
01.RAM-8	It appears that the Greenlink West line would be visible from over 50% of the recreational trails in Beatty. What studies have been done to examine the possible impacts to the economy of the area? What types of remediation can be made a condition of project approval by the BLM? For example, transmission tower type, eco-friendly transmission line type and color, and underground lines for approximately five miles north and south of where it will pass near active private property. Underground lines would mitigate the visual impact and the loss of property value for those private property owners.
01.RAM-9	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to concerns about the impact to the Wash and the archaeological sites and petroglyph panels along it. If existing roads are to be improved and widened, we would like to be involved in their creation and decommission.
01.RAM-11	Wildfire potential is big in Beatty. There were two large fires in 2021 east and west and another one along the proposed Greenlink West route in 2006. That is why burying the line when it is in proximity to occupied private property should be consider ed. These residents are typically in very rural settings and our local Volunteer Fire Department is miles away making response times longer. Also, what types of construction and long-term fire mitigation will be required of the applicant? Should a response from the Town, County or other agency be necessary, how will the applicant assist with the potential cost to the agency(s)?
02.AGA-13	The BLM will use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences. AGA supports this approach. The BLM must consider impacts to mineral resources that would result from the Proposed Action and the potential loss of the socioeconomic benefits deriving from the development of the Silicon deposit and other mineral resources in the Beatty area including but not limited to long-term employment, increased state and local tax revenues, and opportunities for economic diversification.
02.LC-1	So my comment is three things. This is going to be, what, a $2 billion transmission, I'm guessing, looking at the cost of other transmission lines. It's going to be rate-based, so all of our NV Energy customer bills will be raised to build this transmission line. Our rates are going to go up.
02.SP-11	The economic base of this town is tourism. Besides staying in Beatty for Death Valley, people come here for the outdoor adventures. Visitors to Beatty are extreme outdoor enthusiasts. Our national advertising for Beatty highlights the opportunities for outdoor adventures in our area. Beatty offers hundreds of miles for hiking, mountain biking, dirt bikes, off-roaders, geocachers and bird watchers.
02.SP-2	The alternative would potentially harm our property values as it would be visually unattractive and the impact to our local view will also degrade our quality of life. The Oasis Valley and Beatty area is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching.
02.SP-3	Building a transmission project so close to private residences could create health problems. Electric fields are created by differences in voltage: the higher the voltage, the stronger will be the resultant field. Magnetic fields are created when electric current flows: the greater the current, the stronger the magnetic field. Recent studies have shown an increase in the risk of childhood leukemia from people living close to the electromagnetic field produced by high-voltage transmission projects. The BLM and NV Energy have said they would not build the Greenlink Project near residential areas in North Las Vegas for this very reason. We request the same consideration for our area and communities.
02.SP-18	In fall of 2020 the Nevada Commission on Tourism made advertosing grants available to assist communities like ours take steps to work toward economic recovery. These were 100% reimbursed grants through the Cares Grants Program. The message was “Come Visit Our Great Outdoors, we’re safe and open”. I mention this because it’s critical to understand the significant economic impact outdoor recreation has on the State of Nevada. This was a statewide campaign designed to bolster all of our economies by advertising activities in the great outdoors.
03.JB-4	They also -- just in the last week, I read that Governor Newsom decided, well, gee, maybe we shouldn't shut down the nuclear plant, because they know wind and solar can't power the state. Likewise, they're retooling a bunch of their natural gas plants. Why? So the lights will stay on. And where will the battery power come from? We'll have to bulldoze the rest of the state that isn't used for solar for living. And I've lived in Nevada since 1962. It's nice to have some places that aren't industrially developed. And again, I've been a Nevada Power customer since then, and the rates are going up anyway. We cannot possibly afford to shove that off on all of the rate payers.
04.BTAB-4	We have been told that construction of this project in our area will take approximately 3 years to complete. Maintaining the access and connectivity of our recreational routes and the safety of users must be considered and addressed. The Town of Beatty, Beatty Chamber of Commerce, Storm-OV, the Nevada Commission on Tourism, Nevada BLM, and Nevada State Parks have invested significantly in Beatty's eco-tourism economy over the past ten years. It is critical that we retain the ability to attract recreators to our community and that their experience is not denigrated during the construction of this project.
04.BTAB-6	Also, Greenlink West has generated great interest from the Solar Energy Industry resulting in utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for right of ways on tens of thousands of acres of public land in the Beatty area. The BLM should conduct a study on the long-term impacts this would have to the local economy. This could determine what factors are present which could be detrimental or productive to communities surrounded by solar farms and how these factors contribute to the overall economic health of these communities.
04.BTAB-8	It appears that the Greenlink West line would be visible from over 50% of the recreational trails in Beatty. What studies have been done to examine the possible impacts to the economy of the area? What types of remediation can be made a condition of project approval by the BLM? For example, transmission tower type, eco-friendly transmission line type and color, and underground lines for approximately five miles north and south of where it will pass near active private property. Underground lines would mitigate the visual impact and the loss of property value for those private property owners.
04.BTAB-9	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to concerns about the impact to the Wash and the archaeological sites and petroglyph panels along it. If existing roads are to be improved and widened, we would like to be involved in their creation and decommission.
09.EH-3	Projected costs of $2B - which would likely be exceeded as the project was implemented...and those costs would negatively impact a population already burdened by excessive inflation (at a 40-year record high).

CID	Social-Economic/Environmental Justice Comments/Statements
11.AM-18	In the Draft EIS, discuss whether the microwave radio facilities or transmission lines would emit electromagnetic fields and if this could cause impacts to flora or fauna or affect the movements and navigation of species that are sensitive to electric or magnetic fields.
11.AM-21	In the Draft EIS, assess impacts to local communities consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994). Discuss in the Draft EIS the potential for disproportionate adverse impacts to minority and low-income populations and the approaches used to foster public participation by these populations. We recommend using the EPA's Environmental Justice Screening and Mapping Tool, EJSCREEN13 to help identify potential communities with environmental justice concerns that may be impacted by the project. Assessment of transmission project impacts on minority and low-income populations should reflect coordination with those affected populations. For more information on effective public participation in the NEPA process, please also consult the following resources: • Promising Practices for EJ Methodologies in NEPA Reviews; • The Citizen's Guide to the National Environmental Policy Act; and • Community Guide to Environmental Justice and NEPA Methods.
11.BD-1	A concern that I have is how much money are the local counties and cities and towns going to get out of this project? As you indicated, the power line is going to be about 200-foot wide and the substation a certain size. But a concern is how much will Beatty get out of it? How much will Amargosa get out of it? How much will Las Vegas get out of it? How much will the towns up north, and how will that money flow? Will it be a one-shot deal? An annual deal? Just how is the money going to flow into these communities for the issue of mitigation and some of the problems that some of the local people may have to suffer or put up with, I should say?
13.DS-3	The thing that we need to do that has not been addressed here is to move them as far as we can towards -- if it must go -- if it's a must, going to happen, it needs to have the least effect it can on the community and the other uses of public lands that we have that are going to bring us our future in our town here.
13.DS-9	But if it must happen, I think you can weigh and measure out how much power you can produce with that line. You can weigh and measure out what your investment will produce for you, the same way we can weigh out what the recreational value of the land and ecotourism, our trail system, our recreation, our mining benefits for this community.
13.DS-11	Those are things that one needs to look out: How you affect the community, how do you mitigate, how do you compensate for the losses we're going to have if these things do take place? Because we're going to lose some of the value of our land, there's no question, the experience that people come here for. We make big investments in this community, all of us together, and I think those are things that one needs to consider and, in fact, make it mandatory.
13.KE-33	Humming transmission lines create a consistent noise impact. This will impact hikers and other visitors. Noise from construction and helicopters will be a nightmare for visitors and local people. This needs to be analyzed.
13.KE-34	Building a transmission project so close to private residences could create health problems. Electric fields are created by differences in voltage: the higher the voltage, the stronger will be the resultant field. Magnetic fields are created when electric current flows: the greater the current, the stronger the magnetic field. The BLM and NV Energy said they would not build the Greenlink Project near residential areas in North Las Vegas for this very reason. We request the same consideration for other communities. All potential health and safety concerns should be detailed in analysis.
13.KE-35	The transmission line would cross Highway 95 and springs, meadows, native alkaline grasslands, and potentially riparian woodlands. If there is an accident such as a windstorm causing treefall or tower collapse, that would create a potential wildfire danger in drought-ridden fuels. This could be a significant wildfire risk for the residents living in areas along the proposed route. This needs a thorough and detailed analysis due to the many human communities along the proposed transmission route. Burying lines should be explored as an alternatives in order to keep people safe from transmission ignitions to fuel, such as PG&E is exploring.
13.KE-40	The National Environmental Policy Act directs the BLM to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources;…" (NEPA Sec102(2)(E)) 7 https://www.transmissionhub.com/articles/2012/10/nevada-puc-staff-recommends-cost-of-mitigation-issues-with-on-line-not-be-passed-on-to-customers.html Please reject Alternative K or now F for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, and potentially create health and wildlife risks.
13.KE-43	Nevada's beautiful and wild public lands draw recreational seekers and tourism as people view natural vistas, wildlife, climb mountains, and enjoy dark night skies. This economic driver of the state should not be despoiled and cluttered by huge transmission towers and lines, and associated large-scale solar and wind projects. Before such massive transmission and energy sprawl projects are built, the public should be fully engaged. Tourists value the remote deserts of Nevada, the historic open unbuilt landscapes and wildlife. These high values of the Nevada Outback should not be summarily thrown away in a poorly-planned energy build-out that is designed to only benefit utilities, and not the average Nevadan.
13.KE-44 Part 1	Utilities have lobbied against every major proposal to help marginalized communities adopt solar and battery storage: affordable housing solar incentives, community solar, microgrids, on-bill financing and more. Further developing energy projects on intact desert lands fails to implement the President Executive Order "On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." This order would allow for "advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." Local desert communities and rural areas should not bear the burden of renewable energy build-out. There are smarter alternatives based on science and environmental justice. Privileged urban load center communities (cities) should contribute to the solution of climate change by shifting renewable energy generation to the Built Environment with Distributed Energy Resources (DERs), including rooftop solar, solar carports over the abundant desert parking loss, energy efficiency, and energy conservation. Utility-scale solar projects in remote desert areas do not benefit underserved communities, and may actually cost them higher electric bills because of the passed-on costs of new and upgraded transmission infrastructure. DER policies can easily favor shared community benefits, such as with solar gardens that serve apartment complexes, and local community empowerment with rooftop solar and parking lot solar engineering jobs and training to increase build-out in urban core areas. But these urban DER pushes need legislative support that avoids favoritism of corporate solar developers seeking cheap public lands leases, and utilities seeking higher profits from building more and more pricey transmission lines. De facto privatization of public lands occurs when utilities build giant high-voltage transmission lines and solar companies obtain associated and connected 30-year leases of thousands of acres of desert in a right-of-way, and erect 8-foot-tall chain-link fences topped with barbed wire, and often guards hired to patrol the energy plant. Accessibility of public lands has been an issue not well addressed, and this concern would be avoided with Distributed Generation alternatives instead of public lands development for renewable energy. The cost-shift of ratebasing transmission-building is of great concern to us, especially as ratepayers who can ill-afford higher monthly electric bills during inflation and supply shortages will shoulder the cost of construction of the Greenlink West Transmission Project.

CID	Social-Economic/Environmental Justice Comments/Statements
13.KE-44	Public Utility Commissions (PUCs) serve as a replacement for the competitive market. In exchange for granting the exclusive right to sell electricity in a given service territory, PUCs determine how much the utility is allowed to invest and in what, how much it can charge, and what its profit margin can be. This is called the "regulatory compact." The rate base is the book value, after depreciation, of the generation, distribution, and transmission infrastructure owned and operated by the utility for the provision of electric service. Utilities earn a regulated Rate of Return (ROR) on rate base based on their capital structure, debt interest rates, and authorized return on equity (ROE). This ROR is the main source of profit for regulated utilities. Other things being equal, a larger rate base results in a higher net profit for the utilities. The allowed rate of return (return on assets) drives a utility's profitability. Expenses are simply passed through, including fuel in cases where regulated utilities own power plants. Critics have brought up that so-called "rate of return regulation" does not properly motivate utilities to operate efficiently. By having a set rate of return, utilities essentially are incentivized to make unnecessary investments (such as new transmission lines) in order to increase their rate base and therefore, their profits – called the Averch-Johnson effect. They also have limited incentive to keep expenses in check if those costs are simply passed through to customers. Specifically, Jamison (no date at 3) states that: The emphasis on cost recovery in rate of return regulation is the source of the concern that companies may not operate efficiently. For example, if the regulator allows a rate of return that is higher than what the company actually needs to ensure that shareholders continue to provide capital for investment, the company could increase its returns to shareholders by making unnecessary investments (if the regulator does not catch the company doing so). This is called the Averch-Johnson effect. We estimate the approximate cost of the Greenlink West Transmission Project to be in the range of $2 Billion and possibly more based on the associated microwave towers and other communications devices. This cost will be rate based and NV Energy will pass on the cost to ratepayer's bills. This cost passed onto marginalized communities in Nevada should be analyzed. Investments by regulated utilities must be useful to current ratepayers for the provision of utility service. Investments must also be prudently incurred to justify asking ratepayers to pay for them and their associated rates of return.
13.KE-44 Part 2	NV Energy and their supporters claim that ratepayers' increased bills to pay the billions of dollars to construct the Greenlink transmission projects will somehow be made up for in temporary construction jobs. Yet to us, this is comparing apples to oranges. A few temporary construction jobs to build the high-voltage lines, often in our experience by highly-trained out-of-state workers, does not balance the skyrocketing cost in 5 years to Nevada residents who must shoulder this un-needed transmission cost on their electricity bill—and these are often low- and middle-income workers who will not see any benefit from this short-term construction deal. The Greenlink West transmission project alone could easily cost $2 Billion (and most likely more), based on earlier estimates of long 500 kV lines at a Renewable Energy Transmission Initiative 2.0 meeting in 2016.15 Nevada's electricity rate design is regressive, meaning the poorest people are paying more of their overall income to just keep the lights on. Utilities profit by building more and more expensive power lines, such as this Greenlink proposal. For example, California's investor-owned utilities charged ratepayers nearly $20 billion in transmission line projects between 2010 and 2019 and collected more than $20 billion in profits over a similar time period.16 The visual impacts would be located near the residential areas of the Tule Springs Fossil Beds National Monument, Oasis Valley, Sarcobatus Flat, and areas to the north, and this of course can impact their quality of live as well as their property values. Property values go up near national monuments. Values will decline near large transmission lines. A complete socioeconomic analysis should be undertaken to allow Nevadans to see how the project would impact their quality of life and costs, compared to any small benefit.
14.CH-7	In addition to the adverse effects to the U.S. Military and commercial vehicle vendors and end users if the proposed action is approved; the socio-economic impacts to the areas surrounding HTI/NATC would be significant due to the loss of work. Depending upon workload, HTI/NATC employs from 115 to 150 personnel full time personnel. Pati time personnel are added as necessary to supp01i contractual requirements. The socio-economic study area includes the following counties in Nevada: Lyon, Carson City, Washoe and Churchill. Socio-economic impacts would affect Lyon County the most, because approximately 60% ofHTI/NATC's employees reside there and it is the location of most of HTI/NATC's expenditures for taxes and local goods and services. In May 2022, it is estimated that HTI/NA TC employees and their families represent a total population of approximately 215 persons in 113 households. In 2020, the per capita personal income in Lyon, Carson City, and Churchill counties were $29,865, $32,819, and $28,659, respectively (United States Census). HTI/NATC is one of the largest employers in Lyon County, with a total 2022 estimated annual payroll of $8,300,000. 11 years is the average length of employment for full time personnel. The $70,000 estimated average annual wage paid to HTI/NATC employees is considerably greater than the 2020 county-wide median income of $58,814, $58,305 and $56,335 for Lyon, Carson City and Churchill counties, respectively. In addition to providing employees higher than median wages, during 2021, HTI/NA TC expended over $1.5 million for local equipment purchases. HTI/NATC programs bring companies and personnel from around the world to N01ihern Nevada to be present while testing is petformed. More than 1,800 visitors are expected at the HTI/NATC facility this year with a typical stay of three to four days. Some visitors are on site for several months in supp01i of longer duration programs. Expenditures for meals, lodging, car rentals and recreation by these business travelers provide an additional source of income to area businesses and government entities that is not included in the econometric model. These are just a few examples of the socio-economic impacts that HTI/NATC has on the community that would suffer severely, if the proposed action was granted.
14.CH-10	The roadway network attendant to Land Use Permit N-66753 is in the area of U.S. Highway 50 south to Artestia Lake and Mason Valley, west generally to the Lyon County/Carson City boundary, and east to the Sand Springs Range in Churchill County. The proposed action for the powerline route along with access roads to and from the powerlines sta1ting at the Fmt Churchill Substation and up to U.S. Highway 50 East in Dayton/ Silver Springs/ Stagecoach, will directly affect the HTI/NATC Land Use Permit roadway network. All roads indicated as "Existing Road Requiring Improvement" proposed in this area will negatively affect HTI/NATC's operations and our ability to continuously suppo1t the DoD and all of the industrial base involved in that effott. Such maintenance activities will destroy the reference profiles and would require millions of dollars and years of effott to reestablish. In the past, HTI has borne the cost and manpower for roadway maintenance after OHV events, public use, or extreme weather; but as a small, family-owned business, the operation cannot encumber the costs of returning the proposed action roadways back to their original condition if the current proposed action route is approved.
16.JB-1	Please reject the application for the Greenlink West Transmission Project. I write to you as a resident and protector of the southwest desert. I strongly encourage all government officials, all residents, all visitors and all who do business in the southwest avidly protect all southwest lands now and forever. Including all southwest animals and plants for all to thrive. Because of this deep commitment, I respectfully encourage you to reject the application for the Greenlink West Transmission Project. It threatens to harm wilderness, plants, animals, landscapes, views, historic and archeological sites, and even local businesses.
19.JB-1	This project will have a number of very negative impacts, not only to the Nevada environment, but also to the NV Energy ratepayers who will be burdened by much higher power rates.
19.JB-3	This transmission line will burden the people who can least afford it; i.e ., low-income people and indigenous people throughout the state who will have to choose between buying food or paying their much higher power bills.

CID	Social-Economic/Environmental Justice Comments/Statements
19.JB-4	The transmission line will destroy so much of Nevada's wide open and unindustrialized public lands. By opening huge tracts of undisturbed desert lands to industrialization, as the true purpose of this proposed project really is, the health of all Nevadans will be impacted. Drive through Ivanpah Valley on a windy day to witness the unrelenting dust storms resulting from so much desert being bladed and/or disturbed to install solar PV panels. If not convinced, go to Boulder City and see the massive solar developments there, as well as the massive dust storms in Eldorado Valley. The dust is anything but harmless. People throughout Clark County are now having their health impacted by all of the particulate in the air on a windy day. The Eldorado Valley dust storms also carry the spores of Valley Fever (coccidioidomycosis, a fungal lung infection), plus naturally occurring asbestos which causes mesothelioma cancer. Still not convinced: Drive northeast of Las Vegas to the Apex Area, where thousands of acres of land are disturbed for even more solar projects. Check back with the Moapa Piute Tribe in a few years. The health issues from all the dust will no doubt be just as deadly, or even more deadly, than the former methods of generation in the area. Fast forward a few more years, when the massive battery banks necessary to store the solar power for when it is needed on the grid, start catching on fire. The smoke from battery fires is even more deadly than the dust. Plus, much of the power generated by the PV panels will be needed to cool the massive battery banks, which over-heat even in much cooler areas of the California coastline. If even one-half of the planned 230 square miles of solar projects proposed on public lands between Las Vegas and Reno are built, the entire region will be subject to massive dust storms and the resulting health issues.
19.JB-5	Tourism has been and will continue to be the economic driver for the state of Nevada. If all the wide-open spaces of the state are bulldozed for solar, and the viewshed is permanently damaged by solar panels and transmission lines, tourism to much of the state will be impacted negatively.
19.JB-7	While this project is billed as being necessary to prevent power outages, just the opposite is true. The many fires caused by power lines in California will now become commonplace in rural Nevada. The people who live in the rural area of Nevada will gain no positive outcomes from the proposed transmission line, but could well suffer catastrophic losses from fires caused by power lines. These negative effects will be compounded by health issues resulting from chronic dust storms.
19.JB-9	Lastly, building high voltage transmission lines in remote areas may increase the possibility of sabotage to the power lines by terrorist groups, foreign and domestic.
19.JL-2	The other question I had was, is this program going to qualify for LEED renewable energy abatement? Because like the lady said, none of this is actually going to give us any benefits. What that state deal does is it lowers their taxes that they pay to the environment, to the communities that they're in. And if these guys build power lines all the way to Reno and then we don't even get the tax money for it, that's not really fair to us. So it would be nice to know if they're going to apply for that so that they skip out on -- on our fair share of taxes. Right? Can't remember what my other one was.
20.CG-1	You know what I do and that I've spentten years restoring it, a historic property, and trying to do a homestead farm and educational farming, also build a dude ranch out of it, maybe make something for my family and other young families in this town. These maps are incredibly concerning to me. I worked as a surveyor before my current job. And the fact that this line wanders and -- still, on this, we've got a line that completely circumnavigates our town. Yet all of the proposals are this is going to go along my back fence line, which it -- I'm even being denied that I exist. I have a dot -- a dot gov e-mail address. I'm not a hard person to find to get information about these. I get all of my information from the public. I don't get anything internally about this project. And when I ask questions about it, I get told not to ask questions. So I don't trust this. I'm working and want to work towards supporting agriculture in this community. This is one of the most growable places, both Oasis Valley and Amargosa Valley. It's a place where people can make a living off a small farm; people canmake a living off a big farm. Ecotourism is huge here. That's what my education is in.
21.JGL-3	Greenlink West has generated great interest from the solar energy industry resulting in large utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for withdrawal of tens of thousands of acres of public land in the Amargosa, and Beatty areas. The BLM should conduct a study on the long-term impacts this would have to the local economy and the local flora and fauna.
21.JGL-4	The proposed Beatty Material Yard 5 on twenty-five acres of land is on a parcel that includes the Beatty General Improvement District driving range and a portion of the Beatty Cemetery along the Highway U.S.-95 frontage. We are opposed to this due to its proximity to the Beatty High School, which is across the street. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing.
21.JGL-7	Natural resources are critical to us and to Beatty residents' quality of life and economy. Greenlink West will cross land and wetland habitat that is home and range for a wide variety of flora, fauna, including a large number of species of aquatic birds. Hundreds of species of birds migrate through the Oasis Valley which has become named an important Bird Area by the Audubon Society. Bird watching has become an economic resource for Beatty. Visitors come to our town from all over the Nation and the world specifically to bird watch.
22.EG-1	I think that one of the things that is really, really important to me is that people and families come first and that those are the things that you consider, that that should have more weight than other considerations.
25.TR-1	Where it's crossing private land are you going to negotiate a price with the landowners or use condemnation. What about RS2477 rights of way?
27.KB-5	These actions need be taken to impart key information on maps of the draft proposal: a.) Visually indicate each route segment, sub-station, distribution lines, communications sites, access roads, projected energy or minerals projects along the line, that would fragment previously undisturbed parcels of public land. b.) Utilize data/maps from NDOW to indicate by overlay which areas are key wildlife habitat, which are of mid-range importance. Also current migration corridors, not only of mammals, but of migratory bird flyways. c.) Ditto for areas of highest cultural and historical importance. d.) All springs and riparian areas must be clearly specified on the maps.
27.KB-11	Beatty and Oasis Valley: Any route through this area must not veer from existing rights of way and/or transmission lines. The proximity to the town of Beatty and
27.KL-1	How is this going to benefit us in Pahrump?
27.KL-5	You're aware we don't want this here in Pahrump, correct?
29.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project . The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties. The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.

CID	Social-Economic/Environmental Justice Comments/Statements
29.KE-2	Building a transmission project so close to private residences could create health problems. Electric fields are created by differences in voltage: the higher the voltage, the stronger will be the resultant field. Magnetic fields are created when electric current flows: the greater the current, the stronger the magnetic field. Recent studies have shown an increase in the risk of childhood leukemia from people living close to the electromagnetic field produced by high-voltage transmission projects. The BLM and NV Energy have said they would not build the Greenlink Project near residential areas in North Las Vegas for this very reason. We request the same consideration for our area and communities.
29.KE-5	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, damage tourism potential, hurt the local economy, and create health and wildlife risks.
30.MM-3	One is the potential impact on air quality in these -- we had a dust storm here a few weeks ago and it caused tremendous dust clouds over developed areas of Nevada but natural surfaces were preserved. The dust issue has health issues. There are issues like Valley Fever, which has been found in Nevada. There's naturally occurring asbestos, asbestos formed minerals in soils across much of Nevada. And so these things all need to be tied in. But to isolate the corridor itself without considering whole projects, I think, is problematic. And sells Nevada short in terms of its public lands.
40.MM-2	The connected facilities will generate energy far in excess of Nevada's needs, with the excess power intended for sale on the energy grid at market prices. Greenlink is a subsidized connection between corporate power generating facilities and distant cities that will consume most of the power generated in Nevada's open spaces. Few of the profits generated by these solar developments will remain in Nevada while Nevada's rate payers will foot the bill for overbuilt power grid. As it is, existing solar power facilities in the region have been unable operate at profit.
40.MM-3	An important but uncounted part of the financial equation is the cost of environmental degradation that will accompany the project and it's connected actions. Large areas of pristine desert will be disturbed for power line right-of-way and the connected developments. Much of that terrain is 10s to l00's of thousands of years old. The landscape will be permanently and irreversibly altered and delicate desert ecosystems will be irreparably damaged.
40.MM-5	Ancillary impacts include the impacts to the natural environment and the communities along the proposed development. For communities landlocked by the BLM the developments have potential social and economic impacts. Communities with no room to expand will see rising real estate costs and increased demand on services.
42.NS-2	Generally speaking, unless a property owner wants it, the Greenlink West project transmission lines should avoid traversing private property and be far enough away from residences so as not to cause health risks.
82.TH-2	There has been absolutely no mention of the benefits for the local government or its citizens. We are the poorest county in the state. We have almost no resources. Our geographic location is what little resources we do have, and the BLM and NV Energy have offered nothing to the county.What about the roads that will be used when this project is being built and then maintained? What about the construction workers stay? We have a gold mind project with 300 construction workers for 2 years, we have a major lithium plant with 300 construction employees, a long with multiple smaller lithium and gold project all starting at the same time.

CID	Wildfire/Fire Management Comments/Statements
01.KE-5	It's going to impact a lot of - it could cause wildfires.
02.SP-4	The transmission line would cross Highway 95 and even springs, meadows, native alkaline grasslands, and potentially Sally riparian woodlands.
03.JB-3	And yet look what's happened in California. Not only do they have massive wildfires caused by power lines,
03.KE-4	If there is an accident, that would create a potential wildfire danger that could be a risk for the residents living in the area.
04-BTAB-11	Wildfire potential is big in Beatty. There were two large fires in 2021 east and west and another one along the proposed Greenlink West route in 2006. That is why burying the line when it is in proximity to occupied private property should be consider ed. These residents are typically in very rural settings and our local Volunteer Fire Department is miles away making response times longer. Also, what types of construction and long-term fire mitigation will be required of the applicant? Should a response from the Town, County or other agency be necessary, how will the applicant assist with the potential cost to the agency(s)?
10.ELR-17	We request that the DEIS address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the Project that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires, and how the proposed action would increase the occurrence of off-highway vehicle use on the access roads and unauthorized roads. We strongly urge the Proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires and other impacts associated with authorized and unauthorized vehicle use in the desert off of highways. The plan should integrate vegetation management with fire management and fire response.
12.ES-1	I am extremely opposed to the "Greenlink" transmission line project. I frequently bird and hike and sightsee in Nevada. The project would have devastating impacts to pronghorn, birds, cultural resources, and many view sheds and species I dearly love.
14.CH-16	Finally, the cattle grazing on the proposed action route is a key patt in wildfire hazard mitigation. The proposed action route has all three power lines crossing through the Clifton Flat allotment, and one power line goes through the Churchill Butte allotment. Although the cattle may be minimally affected by the loss of feed due to the powerline base structure footprint; the construction period will negatively affect the cattle operation, as the majority of the two allotments may not be able to be used for 1-3 years. This pause in grazing rotation on these areas will inherently increase wildfire threats, as well as, cause the cattle herd to stay on BAH's and HTI's privately-owned land for consecutive months and years, leading to overgrazing practices.
19.JB-7	While this project is billed as being necessary to prevent power outages, just the opposite is true. The many fires caused by power lines in California will now become commonplace in rural Nevada. The people who live in the rural area of Nevada will gain no positive outcomes from the proposed transmission line, but could well suffer catastrophic losses from fires caused by power lines. These negative effects will be compounded by health issues resulting from chronic dust storms.
23.NS-1	Well, for scoping conference, I just have several concerns, you know, with the way everything is put together.The first one is fire, because we've had a huge number of fires lately. And, you know, I would like mitigation for that.
28.KB-2	And I would like to see the one to the east have a -- if it has not already been done, monitoring data so that we know how cost effect is shaping up, when you're also factoring into cost effect any impacts to wildlife.
29.KE-3	The transmission line would cross Highway 95 and even springs, meadows, native alkaline grasslands, and potentially riparian woodlands. If there is an accident, that would create a potential wildfire danger that could be a risk for the residents living in the area.
42.NS-3	The original proposed route for the Scotty's Junction area is between my house and the mountains. The presence of the transmission lines at this location will impact the beautiful view of the mountains not only from my house but US Highway 95 as well. I believe the colors in these mountains rival those of Artist's Palette in Death Valley National Park. The view is one of the reasons that I moved to this location. If the original route is selected, burying the transmission line needs to be considered as it will prevent obstruction of the view. Burying the line, even though more expensive, will probably also mitigate the risk of fire.
42.NS-7	I am concerned about the potential for fire during the construction and operating phase of the transmission line. Everything is dry now due to drought conditions. The Plan of Development indicated that protocols would be followed to eliminate fire risks (such as no smoking except in designated areas, staying out of areas where noxious weeds are growing, having fire extinguishers available). If the transmission line is going over a large patch of existing noxious weeds, removing these weeds to prevent future fire hazards should be evaluated. Once the transmission line is in place, the line needs to be inspected regularly for invasive weeds; these weeds tend to grow after the ground has been disturbed.
49.RS-3	If power lines are constructed through tortoise habitats, there should not be ground clearing and native vegetation removal under these lines. Ground clearing brings in cheatgrass and other invasives that greatly increase the risk for spreading devastating fires. If heavy cheatgrass is not present, most native Mojave desert vegetation is sparse and spaced in a way that a downed power line is much less likely to start a serious fire. If native vegetation under power lines is removed, this may also create a de facto barrier that tortoises may not cross and therefore this could isolate tortoise populations and perhaps lead to harmful inbreeding depression. Please carefully review the attached documents. Some relate to studies of how roads harm tortoises, but these are relevant because they explain how linear disturbances cause significant direct, indirect, and cumulative adverse impacts on tortoises. Indeed, linear projects may harm tortoises over a great setback distance of perhaps a mile or more. I hereby wish to incorporate these attachments by reference as part of my official scoping comments. BLM has an affirmative duty under the Endangered Species Act to work for the conservation and recovery of all listed species including the Mojave desert tortoise. Thus far, BLM has not fulfilled that duty because it continues to approve many harmful projects in tortoise habitats. This has greatly contributed to the rapid decline of most tortoise populations, including some that are likely already below the level for future viability. California BLM at least prepared a comprehensive plan for renewable energy projects in the Mojave desert that included tortoise conservation decisions. Nevada BLM, to their shame, has not done so. I urge BLM to do everything possible to increase protection for tortoises and their habitats. I may augment my scoping comments by the deadline. Thank you very much for your consideration. (Comment includes five attachments: DTC #Abella and Berry 2016; DTC #Road Impacts Bibliography; DTC 2016 Berry et al Annotated Biblio _1991-2015 Desert Tortoises; DTC 2019_Berry and Murphy_CRM_5_109_agassizii; DTC Allison and McLuckie.2018.Popln trends in MDT.)
54.KL-3	What is the fire hazards possible with these lines. Downed PG&E lines have started many fires in recent years.
62.CB-3	Ground disturbance helps cheatgrass expand and the resulting fires are highly destructive.
70.RS-5	Native species are decreasing while cheatgrass and destructive fires are increasing. BLM's FLPMA mandate to maintain the "sustained yield" of renewable resources has never been more important.
75.UNK-3	Invasive plants may be spread and add to serious fire risks.

CID	Noise Comments/Statements
11-AM.-15	Anthropogenic noise can have a significant negative impact on greater sage grouse. We encourage the BLM to work closely with the Nevada Department of Wildlife and incorporate the findings, measurement methodologies, and thresholds presented in recent published literature including the most recent version NDOW Noise Protocols (Ambrose et al. 2021). In addition, we recommend utilizing established, scientifically robust protocols developed by NDOW or research institutions focusing specifically on noise and greater sage grouse when available. In Nevada, consider NDOW's "Acoustic Impacts and Greater Sage-grouse: A Review of Current Science, Sound Measurement Protocols, and Management Recommendations" (NDOW 2020; NDOW 2018).
13.KE-33	Humming transmission lines create a consistent noise impact. This will impact hikers and other visitors. Noise from construction and helicopters will be a nightmare for visitors and local people. This needs to be analyzed.
81.CO-8	Natural sounds are important for wildlife, wilderness, visitors, and cultural-historic events. Animals depend on hearing natural sounds for a range of activities including communication, finding food and avoiding predators. Visitors come to parks to experience the natural quiet and the sounds of nature. Sounds associated with our cultural heritage teach us about the past, connecting us to a time and place in history. Issue: The NPS is concerned that the project, with its preferred alignment through Tule Springs Fossil Beds NM, has the potential to impact the natural soundscape for native peoples, hikers and other visitors coming to the park. Noise from the proposed transmission line would be continuous and add to other existing transmission lines in the renewable energy corridor adjacent to the park. The NPS is mandated to protect visitor experience and to minimize outside noise impacts, consistent with NPS Management Policies 2006. Recommendation: The NPS recommends that predicted acoustic conditions underneath the transmission line at Tule Springs Fossil Beds NM be evaluated against the natural ambient sound level, defined as the sound level which would exist in an environment without contributions from human sources. The NPS Natural Sounds and Night Skies Division recently completed a baseline acoustic survey at the park and is available to share resources and experiences from other projects.

CID	Visual Comments/Statements
01.KE-9	It's going to take a lot of the viewscape away.
01.RAM-8	It appears that the Greenlink West line would be visible from over 50% of the recreational trails in Beatty. What studies have been done to examine the possible impacts to the economy of the area? What types of remediation can be made a condition of project approval by the BLM? For example, transmission tower type, eco-friendly transmission line type and color, and underground lines for approximately five miles north and south of where it will pass near active private property. Underground lines would mitigate the visual impact and the loss of property value for those private property owners.
02.SP-2	The alternative would potentially harm our property values as it would be visually unattractive and the impact to our local view will also degrade our quality of life. The Oasis Valley and Beatty area is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching.
04.BTAB-8	It appears that the Greenlink West line would be visible from over 50% of the recreational trails in Beatty. What studies have been done to examine the possible impacts to the economy of the area? What types of remediation can be made a condition of project approval by the BLM? For example, transmission tower type, eco-friendly transmission line type and color, and underground lines for approximately five miles north and south of where it will pass near active private property. Underground lines would mitigate the visual impact and the loss of property value for those private property owners.
04.HG-2	And the line is proposed to run along the east side of Walker Lake. This is perhaps the most egregious destruction of viewscape. Who can resist stopping at Walker Lake to look at the untold view of the water and desert? This is such an important area for birds too.
05.CD-2	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources.
05.CD-4	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will impact avian wildlife and visual resources.
06.CVW-2	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
06.CVW-4	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
06.CVW-5	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will imnpact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat. Surveyors are finding an unexpectedly large amount of archeology sites along many parts of the line which would be impacted by construction. The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area. The line would tear though important Bi-State sage grouse habitat in the Wassuk Range. This California/Nevada population numbers are just over 3,300 - below the 5,000 threshold biologists say is needed to maintain the population. Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak. The line would impact the view-scape from the historic Ft. Churchill State Park The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources.. The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources. A number of 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas.
12.ES-1	I am extremely opposed to the "Greenlink" transmission line project. I frequently bird and hike and sightsee in Nevada. The project would have devastating impacts to pronghorn, birds, cultural resources, and many view sheds and species I dearly love.
12.ES-2	I frequently birdwatch at Walker Lake. It is a wild and beautiful place. The loss of that viewshed to a massive transmission line would be unmitigatable.
13.DS-2	The reason people come here to recreate in this valley is because of the viewscape, not just for the daylight, but the nighttime also. These power lines are going to make a huge interference on that. We have to watch very carefully where they go.
13.DS-6	The reason that people come here is because of, again, the viewscapes, the opportunities. 160-foot tall power lines aren't a part of that.
13.KE-11	Solar exclusion zones should be evaluated for the viewshed of the Tule Springs Fossil Beds National Monument, the Desert National Wildlife Refuge, the region north of Cactus Springs, Southern Amargosa Valley, areas next to Death Valley National Park, Sarcobatus Flat, Esmeralda Substation for connectivity, the Ft Churchill area, and Mason Valley. Just about all these areas have certain criteria that qualify to be established as a Solar Exclusion Zone. Most have regions that contain Lands with Wilderness characteristics. Sarcobatus Flat and the Esmeralda area have big game migratory corridors for pronghorn. Both the Sarcobatus area and the Esmeralda region have traditional cultural properties and Native American sacred sites. The 32 specific exclusion categories are listed and described in the Solar PEIS Record of Decision (ROD), Table A-2. All future utility-scale solar energy development must be in conformance (43 CFR 1601.0-5(b)) with the exclusions adopted through the Solar PEIS ROD and the associated land use plan amendments. Three large-scale solar applications were recently designated as “Low Priority Projects” by the BLM Battle Mountain District under 43 CFR § 2804. (c) Low-priority applications may not be feasible to authorize. These applications may include lands that meet the following criteria: (1) Lands near or adjacent to lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which may be adversely affected by development; 43 CFR § 2804.35 - How will the BLM prioritize my solar or wind energy application? | CFR | US Law | LII / Legal Information Institute (cornell.edu). (See BLM 2022a, b, and c.)

CID	Visual Comments/Statements
13.KE-24	The line could run on the east shore of Walker Lake creating visual impacts and endangering avian fauna. Walker Lake has been identified as an Important Bird Area by the Audubon Society. Walker Lake lies at the terminus of the Walker River in Western Nevada. The Walker River is one of three major rivers that drain the east side of the Sierra-Nevada Mountains, and it supports riparian, wetland, riverine, and at its terminus, a desert lake ecosystem. Walker Lake itself is a remnant of ancient Lake Lahontan which covered much of central and northern Nevada during the last Ice Age. Walker Lake provides habitat to Western Snowy Plover, Common Loon, Western, Clarks, and Eared Grebes, Double-crested Cormorant, White-faced Ibis, Tundra Swan, Snow Goose, Gadwall, Redhead, Ruddy Duck, Northern Shoveler, and American White Pelican. Walker Lake is a bald eagle wintering area.
13.KE-32	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft. Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management (VRM) Class designations to allow for industrial development in scenic areas of public lands. Due to these impacts, a few land use plans would need amendments. Since July, 2021, the BLM has been talking about a Nevada State-wide Resource Management Plan revision. These revisions would help the public become involved more in these processes. Maps need to be made showing VRM class areas. VRM 2 areas are present in portions of the proposed route, and BLM tells us in meetings these will need to be downgraded. For example, the Tonopah BLM district was not able to locate all of the VRM Class maps in the area when they were asked. Equally, the line will cut through some VRM Class III lands. The project manager at the public meeting stated that even some of the Class III lands the line would cross would require amendments. This is the VRM Class II Objective: To retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. This is the VRM Class III Objective: To partially retain the existing character of the landscape. Allowed Level of Change: 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. We request that certain VRM Classes be reviewed and upgrade to VRM Class II under our ACEC/Conservation Alternative. If BLM approves the project, the Land Use Plan amendments would need to retain the lower VRM Class to accommodate the solar project. This is another example of why the project should be put on hold until a final decision can be made on the Nevada State-wide RMP Revision. For the Tule Springs Fossil Beds National Monument, it would be impossible to mitigate any visual impacts that would be inflicted on the monument by this transmission project. Mitigation options that would be considered would be: 1. Shorten the height of the poles. The poles would be up to 180 feet tall. If they were shortened, the view from longer distances may be mitigated, but the line would be closer to the ground and the visual disturbance would be unacceptable for visitors within the monument. 2. Bury the line. 3. Paint the line a blending color so it is not as visible: This would still create a huge visual contrast, cast unsightly shadows and possibly reflect in moonlight. Plus, camouflaging the color may cause more raptor collisions.
13.PG-7	In these areas, the line would create a new linear disturbance resulting in potential for new impacts, such as habitat fragmentation, elevated perches for predator species, invasive and noxious weed propagation, a modified visual landscape, and an altered recreation setting.
16.JB-1	Please reject the application for the Greenlink West Transmission Project. I write to you as a resident and protector of the southwest desert. I strongly encourage all government officials, all residents, all visitors and all who do business in the southwest avidly protect all southwest lands now and forever. Including all southwest animals and plants for all to thrive. Because of this deep commitment, I respectfully encourage you to reject the application for the Greenlink West Transmission Project. It threatens to harm wilderness, plants, animals, landscapes, views, historic and archeological sites, and even local businesses.
16.JB-3	As you know, the GWTP would be built inside of the Tule Springs Fossil Beds National Monument. It has many destructive elements. GWTP would seriously threaten Ice Age fossils and visual resources. The application's preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground – this would damage fossils in the area. However, NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
16.JB-5	GWTP's transmission line would harm vistas in several Nevada BLM districts. Irreversible damages to vistas would occur in the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. These negative visual impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands. Public land should not be destroyed this way.
16.JB-7	GWTP threatens the east shore of Walker Lake, harming panoramas and landscapes, and endangering birds and other animals. Notably, bald eagles that spend the winters there.
16.JB-9	This project threatens to place large microwave towers along the length of the line, disturbing views, wilderness, and birdlife. One tower would rise near Gold Mountain, a Wilderness Study Area. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak. A tower would rise next to the Long Street Casino in Amargosa Valley, but the owners were not consulted. The line would impact views from the historic Ft. Churchill State Park. The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering birds, animals, and vistas.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
19.JB-5	Tourism has been and will continue to be the economic driver for the state of Nevada. If all the wide-open spaces of the state are bulldozed for solar, and the viewshed is permanently damaged by solar panels and transmission lines, tourism to much of the state will be impacted negatively.
20.JD-2	The proposed Greenlink West project has already spawned over 200 square miles of new utility-scale solar projects, much on largely undisturbed land. If even half of them are developed, they will seriously and adversely impact wildlife, water supplies, archeological sites and view scapes
20.LC-2	How will Visual Resource impacts to TUSK be mitigated?
23.NS-2	Viewsheds, I think that's important. Because right now one of the routes goes behind my house. And, you know, it's been open and pristine for years, and I would just as soon keep it that way and have the transmission lines on the other side of the highway where there's already a bunch of transmission lines.

CID	Visual Comments/Statements
24.KB-8	The Amargosa River has had too many intrusions and manipulations, already, for the convenience of surrounding mining and irrigation projects. Walker Lake is usually overdrawn, trying to keep its shoreline from falling, and doesn't need towers and transmission lines proliferating along the edge to emphasize a downgraded "Visual Resource Management Classification". The view changes, and possibilities for bird flyways through transmission lines would rate negative. Together, decades of Amargosa and Walker water, wildlife and plantlife recovery projects' databases might lose continuity, (slow to build and read) - because of permanent interruption by tower, lines and substation construction and maintenance work.
27.KB-10	Mason Valley & Terminus at Ft. Churchill: a.) Should entirely avoid the Mason Valley Wildlife Management Area b.) Keep open a terminus location alternative that could facilitate a potential HWY 80 alternative to HWY 50 Greenlink North proposal. c.) Should entirely avoid any proximity to or visual impact to the Walker River State Recreation Area.
27.KB-11	Beatty and Oasis Valley: Any route through this area must not veer from existing rights of way and/or transmission lines. The proximity to the town of Beatty and Death Valley National Park is a recipe for major visual and route impacts to tourism and recreation from which both the town and our state derives great benefits.
29.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project (see Figure 1. Map below). The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties. The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.
29.KE-5	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, damage tourism potential, hurt the local economy, and create health and wildlife risks.
31.SS-3	Can you be more specific about mitigation for Visual Resource Impacts to TUSK?
32.KK-3	Second, the proposed Greenlinks west project would have huge impacts from its 469 miles of new transmission lines and substations. The list of impacts would include: Tule Springs Fossil Beds National Monument impacts on ice age fossils, wildlife and Native American cultural sites Mojave and Great Basin habitat for desert tortoise, Bi-state Sage grouse [ravens use raised structures to perch and prey on tortoise and grouse], pronghorn antelope, desert bighorn and Joshua trees visual impacts on places I and many others like to visit because of their scenic beauty -- DNWR, Mount Charleston and the Spring Mountains, and Walker Lake. The BLM would need to downgrade the Visual Resource Management Class of large parts of the Great Basin and Mojave Deserts. any new industrial scale solar plants on public land would have significant negative effects on water, air quality and scenic value.
35.MC-1	I am writing to ask that BLM please reject the application for the Greenlink West Transmission Project (DOI-BLM-NV-0000-2022-0004-EIS) for the following reasons: The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
35.MC-3	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range,Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
35.MC-4	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV, which will imnpact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
35.MC-6	The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area.
35.MC-8	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range
35.MC-9	The line would impact the view-scape from the historic Ft. Churchill State Park.
35.MC-10	The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River, endangering avian fauna and visual resources..
35.MC-14	Because of these many impacts to biological, cultural, paleontological, archaeological, water, and visual resources the Greenlink West Transmission Project should be rejected.
37.K-2	You will destroy the whole viewshed.
42.NS-3	The original proposed route for the Scotty's Junction area is between my house and the mountains. The presence of the transmission lines at this location will impact the beautiful view of the mountains not only from my house but US Highway 95 as well. I believe the colors in these mountains rival those of Artist's Palette in Death Valley National Park. The view is one of the reasons that I moved to this location. If the original route is selected, burying the transmission line needs to be considered as it will prevent obstruction of the view. Burying the line, even though more expensive, will probably also mitigate the risk of fire.
44.PS-3	Both the "Walker Lake" and "Walker River" proposed routes pose significant visual impacts to public lands with significant recreation use and value. Through the EIS and permitting process, the Conservancy encourages the use of existing transmission corridors and the minimization of visual and recreation impacts.
47.RR-7	The line will run on the east shore of Walker Lake creating visual impacts and endangering avian fauna.
48.RO-1	I chose Beatty as my home in 1963 and I would not like ot see power poles or mass solar panels in site or having electric effecting the body. We have a piece of Death Valley. We don't live in Death Valley, but we are in Death Valley country. Beatty is in a beautiful area. To protect Death Valley, to safeguard it's area: picking up a rock is a crime.

CID	Visual Comments/Statements
52.SN-4	These impacts can be easily mitigated by moving the Greenlink corridor to the northeast. In early 2013, Friends of Nevada Wilderness also formally submitted an outline to the BLM Battle Mountain District Office for a high value, natural recreation area of local and regional importance on the public lands centered on what is now the proposed Esmeralda Substation and "Esmeralda SEZ." This area has some of the most stunning, natural scenic areas in Nevada and several potential biological and paleontological ACECs in the Fish Lake Valley area. Additionally, this region is along an important recreational route connecting National Parks, State Parks, National Conservation Areas, and National Monuments. This area has the potential to fulfill a critical link and need for recreation in west-central Nevada. At the heart of this important recreation area are the unique and stunning formations of the Monte Cristo South LWC, known as Monte Cristo's Castle. The BLM has been aware of unique geology, fragility of the formations, and high natural recreational values of the Monte Cristo South area potential since the early 1960s when they first considered formal protections for the area (Robb-Bradick, Tonopah, NV). In 2005, legislation was introduced into the Nevada State Legislature to create Monte Cristo's Castle State Park. The Nevada State Legislature responded in June 2007 by providing for the establishment of the Monte Cristo's Castle State Park, which would be on 5,800 acres of land administered by the BLM. To transfer the land to the State of Nevada for establishment of the State Park, the BLM would conduct an environmental assessment and other work required as part of the Recreation and Public Purpose Lease process. The proposed park included a campground, hiking areas, and interpretive trails with displays about the unique geologic formations in the area. This area can fulfill a critical need for a developed campground to serve as a center of exploration for this outstanding natural region. Unfortunately, with the financial collapse of 2007/2008, the state resources available for the creation of this new State Park vanished. Presently the Monte Cristo South area is considered a premier destination for astrotourism.
52.SN-10	On May 19, 2022, at the Reno public meeting, Greg Helseth, Branch Chief Renewable Energy, BLM Nevada State Office, repeatedly stated that the Greenlink West corridor would use existing transmission corridors with existing transmission lines. This statement is misleading because the 2016 Department of Energy, Section 368, Corridor 18-244 (aka Greenlink West) Study, Table 3-7, states that the corridor length is 244.18 miles (estimated) and the length of the transmission lines within the corridor is 96.3 miles. Based on these numbers, only 39% of the corridor is developed. This means that 61%, or 109 miles of the proposed route, does not contain existing transmission lines or surface infrastructure (roads, borrow pits, or substations). The section of the proposed corridor that we are concerned with (from Milepost 87 to Milepost 166) is essentially natural with virtually neither infrastructure nor developments. Over 100 miles of the proposed Greenlink Transmission Line utilizes an undeveloped ROW through intact natural public lands, which indicates that the BLM has not yet considered other viable corridors that can work to consolidate utilities and multimodal uses to reduce the unnecessary proliferation of dispersed rights-of-way. Statements like this without all the facts appear to intentionally reduce the perception of ecological and visual impacts that would occur from a project the size of Greenlink West. Further, when asked if the proposed Greenlink Transmission Corridor has been considered as part of a multimodal corridor, including looking at the proposed alignments of Interstate-11 along the majority of the corridor, Greg Helseth replied that Interstate 11 was a fantasy and would not be considered in the Greenlink Transmission EIS. While this project may or may not happen, these huge corridors need to be co-located and coordinated to reduce impacts. There is a court ordered Settlement Agreement for Section 368 Corridors to strive to reach the "diminution of the proliferation of dispersed rights-of-way (ROWs) crossing the landscape" [Wilderness Soc'y, et al. v. U.S. Dept of Interior, No. 3:09-cv-03048 JW Joint Motion to Dismiss Case Pursuant to Fed. R. Civ. P. 41(a)(2)] and recommendations of the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (see Table on page 30 for the 18-224 Nevada row, under the Recommended Revisions, Deletions, and Additions, & Rationale columns for recommendations on aligning 18-224 with the proposed I-11 corridor). Combining the Section 368 Greenlink Transmission Corridor with the proposed Interstate-11 Project would satisfy the court-ordered settlement and be in compliance with the most recent Section 368 Energy Corridor Review recommendations (which the BLM is party to). FNW REQUEST: Reduce/eliminate proliferation of rights-of-way, and use corridors with existing disturbance wherever feasible.
53.WB-3	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
53.WB-5	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
53.WB-6	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will impact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
53.WB-7	The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area.
53.WB-9	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak.
53.WB-10	The line would impact the viewshed from Fort Churchill State Park. The vast landscapes, unimpeded by transmission lines and development that have set Central Nevada apart from the west, will be forever impacted by this project.
53.WB-11	Additionally, the Greenlink transmission line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources. This is one of the most beautiful and visually unimpacted areas in all of Nevada.
66.HG-1	The Visual Resource Classes should be re-evaluated for at least four areas along the path of the proposed GreenLink West Transmission line. Other areas have apparently not been studied yet, based on the BLM's Visual Resource Management (VRM) areas within the State of Nevada dataset, as accessed May 28, 2022.
66.HG-2	Crater Flat, currently rated a class 4, should be considered as a separate Scenic Quality Rating Unit. Instead, it is lumped in with over a million acres. This area should be rated as a Scenic Quality class A, based on landform, color, adjacent scenery and scarcity (Scenic Quality Inventory and Evaluation Chart, Manual H-8410-1).
66.HG-5	Areas east and northeast of Beatty directly adjacent to the Timber Mountain Caldera National Natural Landmark are also unfathomably categorized as a class 4 scenic resource.

CID	Visual Comments/Statements
66.HG-9	Other areas in the path of the GeenLink West Transmission line where Visual Resource Classes should be re-evaluated include: • East Walker River, currently unrated with the exception of a small area of Class 2. This is home to the Walker River State Recreation Area • Adrian Valley, currently unrated. An uninhabited valley with railroad tracks through beautiful stands of cottonwood • Carson River west of Fort Churchill, mostly unrated where the transmission lines cross the river valley. A popular back-country recreational route travels along the Carson River between Fort Churchill and Virginia City Thank you for your consideration or re-consideration of these visual resources.
66.KE-4	Also, the line will be a clear visual eyesore along the east shore of Walker Lake. What is the visual class of this area and how will those impacts be avoided? Or is that a sacrifice area visually?
70.RS-8	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area.
70.RS-11	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
70.RS-14	The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area.
70.RS-16	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak.
70.RS-17	The line would impact the view-scape from the historic Ft. Churchill State Park
70.RS-18	The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources.
81.CO-12	The NPS Organic Act establishes the agency's responsibility to conserve the scenery for the enjoyment of this and future generations. Scenic views are valued for their beauty, connect people with culture and history, and are an important resource identified by NPS visitors. In 2020, 6.1 million visitors spent an estimated $279 million in local regions while visiting parks in Nevada. See Visitor Spending Effects - Economic Contributions of National Park Visitor Spending - Social Science, U.S. National Park Service (nps.gov). Issue: The NPS is concerned that the viewshed at popular visitor areas could be adversely impacted by the presence of the transmission line and associated infrastructure. • The preferred alignment of the Greenlink West Project (Link 155) runs through one of the main visitor use areas for Tule Springs Fossil Beds NM. The area, near the intersection of Durango and Moccasin Roads, is considered a main entrance to the park and features an interpretive kiosk, trailhead, and parking area for visitors. The view beyond the kiosk and parking area is considered the most scenic entrances to the park. The project would introduce up to 180-foot-high towers at the site with little or no way to mitigate visual impacts. • Viewshed analyses completed by NPS also indicate the transmission line and associated infrastructure range in distance from 1.5 -10 miles from the boundary of Death Valley NP and would be visible from several Key Observation Points inside the park. Recommendation: The NPS appreciates the early coordination already extended by the BLM and requests ongoing coordination to minimize visual impacts at Tule Springs Fossil Beds NM. The NPS recommends the visual resource impact assessment describe the visibility and potential impacts of the project to all potentially impacted NPS sites in terms of proximity and contrast, and the change in landscape character as viewed from the units. The project proponent should utilize the best available technology for reducing day- and night-time visual impacts of project infrastructure.
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).

CID	Historical/Cultural Resources Comments/Statements
07.CB-2	The other thing -- I'm an archeologist, and the -- there's a large national registered site in the Mercury Valley that -- I know that the left power line, when it was moved around it, and so I have a concern about it going -- it going right along the highway.
12.ES-1	I am extremely opposed to the "Greenlink" transmission line project. I frequently bird and hike and sightsee in Nevada. The project would have devastating impacts to pronghorn, birds, cultural resources, and many view sheds and species I dearly love.
16.JB-1	Please reject the application for the Greenlink West Transmission Project. I write to you as a resident and protector of the southwest desert. I strongly encourage all government officials, all residents, all visitors and all who do business in the southwest avidly protect all southwest lands now and forever. Including all southwest animals and plants for all to thrive. Because of this deep commitment, I respectfully encourage you to reject the application for the Greenlink West Transmission Project. It threatens to harm wilderness, plants, animals, landscapes, views, historic and archeological sites, and even local businesses.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
24.KB-7	The Tule Springs Fossil Beds provide "refugia" (Last Stand) habitat for wildlife, and keep wetlands and groundwater systems functioning. They contain archeological and paleontological sites, protected for decades, by Tribal authorities and individual researchers, waiting for future less-destructive, more effective technology, with which to access and read the fossil record, and study past seasons in a rechargeable environment. Not a place to send in heavy equipment, to build (increasingly unnecessary) utility scale industrial infrastructure.
81.CO-6	The lands within Tule Springs Fossil Beds NM have been used by humans since at least the Paleoindian period, about 12,000 years ago at the end of the last ice age. The area is of cultural and religious importance to the Southern Paiute people, who consider the land as a place for peace for connecting with the past. It is part of the Salt Song Trail, songs that describe the sacred landscapes of the Paiute people that lived in the region, BLM Upper Las Vegas Wash Conservation Transfer Area Final Environmental Impact Statement (2012). Issue: Salt Songs are visually and physically connected landscapes which derive significance from both symbolic and phenomenological experience of traversing through them. The Greenlink West Project would introduce physiological changes to the cultural landscape and potentially alter the identity of the community. Recommendation: The NPS recommends the BLM work closely with tribal partners to determine the impacts to the cultural landscape in the Las Vegas Wash area. As stated in the Final EIS and Record of Decision for the Upper Las Vegas Wash Conservation Transfer Area, the Las Vegas Wash should be considered a Traditional Cultural Property (TCP) for the Las Vegas Paiute, Chemehuevi, and Moapa Paiute Tribes. As a newly established NPS unit, Tule Springs Fossil Beds NM is still gathering data to determine what cultural and archaeological resources are present on site. A historic resource study scheduled to occur later this year will provide baseline evaluation of cultural resource management practices and knowledge of existing archeological resources that can help inform future planning processes and core archeological data products, such as the ethnographic overview and assessment.

CID	Air Quality Comments/Statements
11.AM-10	In the Draft EIS, provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the project, including cumulative and indirect impacts. Such an evaluation is helpful in demonstrating compliance with state and federal air quality regulations and disclosing the potential impacts from temporary or cumulative degradation of air quality. In the Draft EIS, estimate emissions of criteria pollutants and greenhouse gases – including sulfur hexafluoride – from the proposed project and discuss the timeframe for release of these emissions over the period of the project. Specify emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. Use source-specific information to identify appropriate minimization and mitigation measures and areas in need of the greatest attention. Sulfur hexafluoride Sulfur hexafluoride (SF6) is commonly used in electric transmission systems in circuit breakers, substations, and other switching gear and is the most potent greenhouse gas known. Because of its long- life span and high global warming potential, even a relatively small amount of SF6 can impact the climate. Disclose if SF6 would be used in any components of the Greenlink West Project and, if so, utilize a lifecycle approach to ensure that SF6 emissions are minimized. Portions of the proposed Greenlink West project may traverse areas7 that contain Coccidioides immitis, a fungus causing Valley Fever in humans. Ground disturbing activities associated with the proposed project may result in dispersal of Coccidioides spores. Include, in the Draft EIS, a discussion of this potential health and safety impact, as well as measures that can prevent or reduce the risk of exposure to workers and residents.
13.KE-37	We are also particularly concerned about the compromised air quality that will most likely result from the construction of this project. The land rush of large solar projects all over the southwestern US has resulted in expedited approval of many of these projects. In most of the cases, the developers have not adequately mitigated the fugitive dust that has resulted in the removal of large acreages of vegetated desert lands. We are concerned that industrial construction in the region will compromise the air quality to the point where not only visual resources, but public health will be impacted. The cumulative dust and particulate emissions should be analyzed for the combined transmission project and associated utility-scale renewable energy projects. We are also concerned that the applicant will have no choice but to use more water in an already over-drafted aquifer to control the large disturbance they intend to create with new roads, construction on 474 miles of new construction, roads, and a 600-foot-wide construction right-of-way along the main high-voltage line. Where will dust suppression water come from along the line?
30.MM-3	One is the potential impact on air quality in these -- we had a dust storm here a few weeks ago and it caused tremendous dust clouds over developed areas of Nevada but natural surfaces were preserved. The dust issue has health issues. There are issues like Valley Fever, which has been found in Nevada. There's naturally occurring asbestos, asbestos formed minerals in soils across much of Nevada. And so these things all need to be tied in. But to isolate the corridor itself without considering whole projects, I think, is problematic. And sells Nevada short in terms of its public lands.
40.MM-7	In recent decades, geologic studies of dust have made significant advances in understanding the desert soils and their ability to store carbon and dust. I see little indication that that state of the science is considered in expansive plans to develop the desert. The ancient soils that mantJe the desert landscape store l00O's of years of dust that is released when the soils are disturbed. Soil forming processes in Nevada's desert lock carbon dioxide in mineral deposits that form in the soil. Wide-scale disruption of desert soils break down the carbon fixing processes and release stored carbon. If Greenlink and the connected developments are intended to be "green" the full carbon budget needs to be addressed quantitatively. Dust released by areally extensive developments is major risk for regional air quality. Green link and the connected developments risk destroying one of the few remaining areas with good air quality. Dust emissions are also a health hazard. Desert soils have been shown to contain harmful elements like arsenic that can distributed by the wind once they are released by disturbance. Similarly the dust may contain harmful minerals like naturally occurring asbestos, which is found in many of the areas for proposed development, and harmful organism like the soil fungi that cause valley fever. Windblown dust from poorly sited developments in desert soils have become notorious hazards resulting numerous highway fatalities in Texas, Arizona, and California.
81.CO-9	Air quality is an important component of the overall NPS visitor experience. At Death Valley NP, the mostly treeless landscape along with the great range of elevations lead to an abundance of striking and accessible views. The view at the entrance to Tule Springs Fossil Beds NM showcases the scenic badland features of the Las Vegas Formation that are not easily viewed elsewhere. Issue: Construction of the Greenlink West Project has reasonable potential to generate fugitive dust from ground disturbing activities. Surface soils around the two desert parks are highly erodible, particularly at Tule Springs Fossil Beds NM. The park is located in the Upper Las Vegas Wash and, as such, is in a constant state of erosion (for example, erosion at the bases of existing transmission lines are evident at the Eglington Preserve). Palliative measures need to be sufficient to keep fugitive dust from entering parks during frequent high wind events characteristic of the desert. Mitigation measures in the dust control plan must be sufficient to control fugitive dust. Recommendation: The NPS recommends that every effort be made to avoid or minimize impacts to highly erodible desert soils while retaining as many existing native plants to help stabilize soils. The NPS also recommends that the project include a defined plan for air quality monitoring at Tule Springs Fossil Beds NM throughout construction, including a responsible party and funding source for monitoring, and include an adaptive management plan to manage for fugitive dust.

CID	Water Resources Comments/Statements
09.EH-5	Justification for the project says that "Nevada has an existing transmission system that is approaching carrying capacity due to increased growth during the last decade" -- but such a project would further increase growth in a state that has limited water resources. Increased growth would further strain existing conditions as water levels in the two major reservoirs on the Colorado River (Lake Mead and Lake Powell) are reaching critical lows.
11.AM-5	Vegetation clearing within the project area has the potential to alter drainage and runoff patterns, which may in turn impact surface water and groundwater resources, whether directly or indirectly. In assessing the potential impacts of each alternative on groundwater systems in the project area, we recommend that the Draft EIS examine the potential for changes in the volume, storage, flow, and quality of groundwater using available characterization of groundwater resources and groundwater use. If any adverse impacts to groundwater resources are identified, we recommend considering alternatives, mitigation measures or operational controls that would avoid, reduce, or minimize impacts on groundwater. In assessing the potential impacts of each alternative on surface water in the project area, we recommend that the Draft EIS consider hydrological models to determine water quality impacts to project area surface waters, including consideration of contaminants impacting waterways listed as impaired under Clean Water Act Section 303(d).
11.AM-7	Discharge of dredged or fill material into waters of the U.S., including wetlands, is regulated under Clean Water Act Section 404. This permit program is administered jointly by the U.S. Army Corps of Engineers and the EPA. We recommend that BLM consult with USACE to make a final determination as to the applicability of CWA Section 404 permit requirements to wetlands, if any, that would be impacted by any new construction in the Project area. The EPA encourages this coordination as early as possible in the planning process. In Nevada, the Division of Environmental Protection, Bureau of Water Quality Planning is responsible for issuing or denying 401 Water Quality Certification for Nationwide Permits. Provide sufficient, timely information to support decisions in compliance with the EPA's CWA Section 404(b)(1) Guidelines in the Draft EIS, thereby supporting the timely permitting and construction of the proposed transmission line by the projected in-service date.
13.KE-21	The transmission line might be built over the Species Spring area. Species Spring is an important water resource for one of the most popular desert bighorn sheep hunting areas in Nevada. A new 525kiloVolt transmission line would require new, wide roads and all helicopter activity would scare away the bighorn sheep.
13.KE-36	The applicant should develop a detailed erosion and sedimentation control plan, and a flood risk control plan now for public review. Widespread alluvial flooding events and sheetwash deposition occurs. Analysis of how towers and new roads will be impacted by floods and erosion should be included.
14.CH-14	The Carson River has changed path several times over the years and therefore current and historic oxbow conditions exist. Upstream evaluations have shown that these oxbows can contain substantial residual mercury deposits. Consideration of the potential disturbance of these mercury deposits on public and private land during construction is essential. In addition, HTI urges BLM to review any disturbance the powerline base structures would have on river flow, bank erosion and the possibility of secondmy affects to water distribution into diversion dams, irrigation ditches in areas where the proposed action lines cross the Carson River and downstream to Lahontan Valley Reservoir. Historically, the frequency of severe flooding of the Carson River in the area proposed near Susan's Bluff has increased dramatically in the last 20 years. This flooding is due in pmt to the significant urban growth which has occurred upstream, with many houses replacing open fields. The flow rate of the Carson River has also increased during these floods causing significant damage which has the potential to adversely impact any structures placed in the area of Susan's Bluff where the river becomes more channelized. Small changes to the flow of the Carson River upstream have shown the potential for substantial damage downstream, and therefore should be considered.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
20.JD-2	The proposed Greenlink West project has already spawned over 200 square miles of new utility-scale solar projects, much on largely undisturbed land. If even half of them are developed, they will seriously and adversely impact wildlife, water supplies, archeological sites and view scapes.
23.NS-4	And then, of course, during construction, I was concerned that vibrations from the construction might interfere with my wells and stuff, because my wells are old.
24.KB-7	The Tule Springs Fossil Beds provide "refugia" (Last Stand) habitat for wildlife, and keep wetlands and groundwater systems functioning. They contain archeological and paleontological sites, protected for decades, by Tribal authorities and individual researchers, waiting for future less-destructive, more effective technology, with which to access and read the fossil record, and study past seasons in a rechargeable environment. Not a place to send in heavy equipment, to build (increasingly unnecessary) utility scale industrial infrastructure.
24.KB-8	The Amargosa River has had too many intrusions and manipulations, already, for the convenience of surrounding mining and irrigation projects. Walker Lake is usually overdrawn, trying to keep its shoreline from falling, and doesn't need towers and transmission lines proliferating along the edge to emphasize a downgraded "Visual Resource Management Classification". The view changes, and possibilities for bird flyways through transmission lines would rate negative. Together, decades of Amargosa and Walker water, wildlife and plantlife recovery projects' databases might lose continuity, (slow to build and read) - because of permanent interruption by tower, lines and substation construction and maintenance work.
35.MC-14	Because of these many impacts to biological, cultural, paleontological, archaeological, water, and visual resources the Greenlink West Transmission Project should be rejected.
40.MM-6	Water is already a critical resource in the region. The EIS should consider the impact on regional water supplies.
42.NS-4	The towers for the transmission lines will need to be set into the ground. In this area, the water table level varies depending on location. This will need to be evaluated.
42.NS-5	If the original proposed route is chosen, I am concerned that building the transmission line will cause the ground to vibrate and affect structures on my property such as wells.
55.NS-2	Will the building of transmission lines affect people's wells? The water table varies in different areas. I was thinking about well casings if the ground shakes due to building the lines.*[Attendee]* added that the water table isn't deep in Beatty. *[Attendee]* added that it's at the surface in some places.
61.LC-1	The Apex Industrial Park depends upon the Congressionally created Utility and Transportation Corridors where Project Greenlink is being proposed. Specifically the "middle" portion of the corridor created by N-52787 is needed to extend the Oversized City of North Las Vegas waterline infrastructure to serve the northern portion of Apex. This extension must be located on the eastern side of the corridor because of topographic constraints--the western side of the corridor is mountainous. A power line can be placed on mountains--it happens all the time. A waterline is buried and is much more difficult to install where it is mountainous.
77.TA-17	BLM continues to identify drought as a major impact to the wellbeing of our western public lands and public water sources.

CID	Water Resources Comments/Statements
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).

CID	Wildlife Comments/Statements
01.RAM-13	Wildlife, Natural Areas, and Watersheds- Natural resources are critical to Beatty residents' quality of life and our economy. Greenlink West will cross land and wetland habitat that is home to a wide variety of flora, fauna, and aquatic species. One of the biggest impacts will be avian. Birds commonly collide with transmission lines and are often electrocuted. Hundreds of species of birds migrate though the Oasis Valley which has been named an important Bird Area by the Audubon Society. Bird watching is also an economic resource for Beatty. Visitors come to Beatty from all over the Nation and Globe specifically to bird watch.
02.SP-6	Oasis Valley is one of the rare routes that guarantees water for migrating birds between the Mojave Desert and the Great Basin. The only alternative is Pahranagat Valley to the east. The Amargosa River winds through Oasis Valley and is classified as ephemeral; however, there are short stretches of permanent water. Elsewhere in the valley, numerous springs, wetlands and farm ponds support an important flyway and a riparian corridor centered with the town of Beatty. These riparian corridors are surrounded by typical upland transitional vegetation of the Mojave and Great Basin desert scrub ecotones. Most of the valley floor is privately owned and the town of Beatty is currently working on restoration of the riparian and spring systems within the Valley. The transmission line would create a collision hazard for birds, which is a concern because the Oasis Valley and the Amargosa River in the town of Beatty have been known as a Bird Watchers Paradise by the National Audubon Society. Over 300 birds from 21 Species have been spotted in the Oasis Valley and Beatty area since 2002. A very tall transmission line would most likely kill a great number of birds in our region and those migrating.
02.SP-7	The transmission line would have to be built over the Specie Spring area. Specie Spring is one of the most popular desert bighorn sheep hunting areas in Nevada. A new 525kV transmission line would require new, wide roads and all helicopter activity would scare away the bighorn sheep.
03.KE-6	The transmission line would also create a collision hazard for birds. Highway 95 traffic already does that, but a very tall transmission line would most likely kill a greater number of birds in our region.
04.BTAB-13	Wildlife, Natural Areas, and Watersheds- Natural resources are critical to Beatty residents' quality of life and our economy. Greenlink West will cross land and wetland habitat that is home to a wide variety of flora, fauna, and aquatic species. One of the biggest impacts will be avian. Birds commonly collide with transmission lines and are often electrocuted. Hundreds of species of birds migrate though the Oasis Valley which has been named an important Bird Area by the Audubon Society. Bird watching is also an economic resource for Beatty. Visitors come to Beatty from all over the Nation and Globe specifically to bird watch.
04.HG-2	And the line is proposed to run along the east side of Walker Lake. This is perhaps the most egregious destruction of viewscape. Who can resist stopping at Walker Lake to look at the untold view of the water and desert? This is such an important area for birds too.
04.HG-4	The transmission line would then run up the eastern side of the farming communities in Mason Valley and north of Mason Valley Wildlife Management area, another important area for birds.
05.SS-3	Now, in honor of the nonhuman world that doesn't have a voice, I'm going to spend the remaining minute that I have in silence.
06.CVW-3	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees
06.CVW-5	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will imnpact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat. Surveyors are finding an unexpectedly large amount of archeology sites along many parts of the line which would be impacted by construction. The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area. The line would tear though important Bi-State sage grouse habitat in the Wassuk Range. This California/Nevada population numbers are just over 3,300 - below the 5,000 threshold biologists say is needed to maintain the population. Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak. The line would impact the view-scape from the historic Ft. Churchill State Park The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources.. The line will enable the construction of many utility-scale solar projects on the high-value public lands western Nevada. These projects will impact wildlife, rare plants, local communities, archeological resources, Indigenous and tribal values, groundwater, and visual resources. A number of 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas.
06.JM-3	We have three concerns -- overarching concerns. First is habitat fragmentation. The preferred alternative should not increase habitat fragmentation. This could be avoided by collocating the line along Highway 95 and existing power lines and minimizing the project's disturbance footprint.
06.JM-4	Secondly, the disruption of migratory bird flyways. The line crosses or is adjacent to several locations that are critical to the survival of migratory birds. This project should avoid impacting critical migration corridors and be designed to avoid predation and other sources of avian mortality.
06.JM-5	And then, finally, displacement. The preferred alternative should avoid displacing wildlife from important habitat areas. It should also avoid displacing recreation uses. We have a couple of specific comments for proposed alignment.
09.EH-2	Environmental damage to sensitive habitats and Native American tribal lands and cultural areas.
09.LO-1	I'm not going to say anything that you haven't already heard. And I'm certainly not a scientist or an expert. I'm a tree planter. I'm from Nevada, and I'm a Mojave desert lover. I'm not sure which group I'm most worried about: Losee, Tule Springs Fossil Bed, Beatty, Scotty's Junction, Walker River, Carson River. And it's not just the line. It's everything that's associated with it. They divided [inaudible], and that's not all. That's just one. Where will the antelope migrate? Where -- where will the Joshua migrate? If we can even, in one lifetime, thinkof Joshua trees migrating and creosote migrating. It's already migrating north three deserts. Where will it go?
10.ELR-16	The DEIS should analyze whether this new transmission line would result in an increase of common ravens and other predators of the desert tortoise in the affected regions. For example, common ravens are known predators of the tortoise, and use transmission and distribution lines as structures for nesting and hunting (Lovich and Bainbridge 1999). During construction, operations and maintenance, and if appropriate, decommissioning of the proposed action, BLM should require science-based monitoring of tortoise predation and managing it to pre-project levels. The monitoring and management plan should implement actions that would eliminate human subsidies associated with transmission lines such as food, water, and sites for nesting, roosting, and perching and address its effectiveness at a local, regional, and range wide level for the tortoise. It is very important that in tortoise habitats, the Proponent use towers for transmission and distribution lines with a design that prevent raven nesting. For example, the tubular design or monopole with insulators on horizontal or downward sloping cross arms is preferable, as this design reduces the availability of nesting and roosting substrates for common ravens that lattice towers provide. Lattice towers should not be used. Please ensure that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a projectspecific management plan for common ravens. This template includes sections on construction, operation, maintenance, and decommissioning (including restoration) with monitoring and adaptive management during each project phase (USFWS 2010).

CID	Wildlife Comments/Statements
11.AM-12	In the Draft EIS, identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. Identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and include mitigation for impacts to these species. Indicate what measures would be taken to protect important wildlife habitat areas from potential adverse effects of proposed activities. We recommend that emphasis be placed on the protection and recovery of species due to their status or potential status under the federal or state endangered species legislation. Discuss whether desert tortoise, greater sage-grouse – including the bi-state population of greater sage-grouse, bighorn sheep, pronghorn antelope, or mule deer occur in the project area and, if so, analyze potential impacts from the proposed project to these species. Transmission line rights-of-way are anthropogenic disturbances which alter the spatial structure of habitat elements, creating linear patches or line corridors, which in turn impact ecological integrity by modifying ecological processes at various scales. Transmission line ROWs can result in habitat fragmentation and increased habitat edge effects, affecting individual species with different intensity. The EPA recommends the BLM coordinate with the U.S. Fish and Wildlife Service to determine whether consultation under Section 7 of the Endangered Species Act would be required and with the USFWS and Nevada Department of Wildlife to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in all species protection and mitigation efforts. Disclose in the Draft EIS the status of such coordination efforts, as well as any potential impacts of construction and operations activities on habitat and species, and any measures that would be implemented to protect important wildlife habitat areas from potential adverse effects of proposed activities. Analysis of impacts and mitigation on covered species should include: • Baseline conditions of habitats and populations of the covered species. • A clear description of how avoidance, mitigation and conservation measures would protect and encourage the recovery of the covered species and their habitats in the project area. • Monitoring, reporting and adaptive management efforts to ensure species and habitat conservation effectiveness. • Identification of nearby migration corridors and potential for habitat fragmentation.
11.AM-13	We recommend that fencing proposed for infrastructure in this project meet appropriate hydrologic, wildlife protection and movement, and security performance standards. Ensure that the design of any above ground power lines, riser poles, transformers, and conductors comply with the latest guidance from the Avian Power Line Interaction Committee.
11.AM-16	Nevada's Executive Order 2021-18 – Creating the Nevada Habitat Conservation Framework On August 23, 2021, Nevada Governor Steve Sisolak signed Executive Order 2021-18 which instructs the Nevada Departments of Wildlife, Transportation and Natural Resources to develop a plan called the Nevada Habitat Conservation Framework (Framework). Through coordination with land management agencies and other interested parties, the State will use the Framework to evaluate threats, prioritize landscapes, and develop strategies to restore and conserve at risk wildlife habitats, including migration corridors. A key component of the Framework will be the development of the statewide Nevada Wildlife Connectivity Plan that seeks to identify and conserve migratory corridors for ungulates and other key species. The EPA encourages the BLM to work closely with NDOW, NDOT, and NDCNR to ensure that the proposed project does not impact sensitive species, critical habitat, migration corridors, and scenic landscapes within the state of Nevada, in accordance with Executive Order 2021-18.
11.AM-18	In the Draft EIS, discuss whether the microwave radio facilities or transmission lines would emit electromagnetic fields and if this could cause impacts to flora or fauna or affect the movements and navigation of species that are sensitive to electric or magnetic fields.
12.ES-1	I am extremely opposed to the "Greenlink" transmission line project. I frequently bird and hike and sightsee in Nevada. The project would have devastating impacts to pronghorn, birds, cultural resources, and many view sheds and species I dearly love.
12.ES-3	I also Birdwatch in Beattie, Nevada. The riparian Cottonwood Groves are all-inspiring. I was there just three days ago. Placing a major transmission corridor close to all those beautiful cottonwoods would likely result in bird mortality from striking guy wires.
13.KE-17	In its May 17, 2022, Beatty, NV scoping meeting, BLM explained that during the Greenlink West environmental review process, many land use plans may need to be opened and amended, including the 2016 Nevada and California Greater Sage-Grouse Bi-State Distinct Population Segment Land Use Plan Amendment (LUPA) for the Carson City District and the Tonopah Field Office located in Nevada. Now that the Bi-State sage-grouse is once again a candidate for listing under the Endangered Species Act due to recent litigation2, this taxon needs a more thorough review and higher level of protection. Simply attempting to amend this plan—which guides multiple agencies and stakeholders towards stabilizing and recovering the bird—in order to construct high-voltage lines over its mountain habitats--is simply unacceptable. Weakening the management of this declining taxon to allow a giant transmission line through its range is counter to the goals of recovery. New transmission creates a risk for catastrophic wildfires in sage grouse habitat. Increased drought and climate change greatly increase this risk.
13.KE-18	Lakes, wetlands, rare plant communities, Joshua tree habitats, Mojave desert tortoise, sage-grouse, and many other high-value natural resources will be significantly impacted by this transmission line proposal and connected utility-scale energy-sprawl projects.
13.KE-19	Constructing the line will require new roads and extensive cleared areas. This will impact species like burrowing owls, desert tortoise, kit fox, American badger, Western Joshua tree, Las Vegas bear poppy, Las Vegas buckwheat and other rare plants. The EIS should map and detail all sensitive, rare, and threatened and endangered species along the proposed route.
13.KE-20	The Greenlink West as mapped appears to slice directly through a pronghorn antelope fawning ground that we have found recently in southeastern Sarcobatus Flat, on the east side of US 95. *Photo caption: Pronghorn antelope mother and newborn fawn during a wildflower bloom just east of US 95 in Sarcobatus Flat. Several pronghorn were giving birth here. The mapped route of the Greenlink line would disturb this sensitive area. Photo: Kevin Emmerich.*
13.KE-21	The transmission line might be built over the Species Spring area. Species Spring is an important water resource for one of the most popular desert bighorn sheep hunting areas in Nevada. A new 525kiloVolt transmission line would require new, wide roads and all helicopter activity would scare away the bighorn sheep.
13.KE-22	The line will cross over wetlands along the Amargosa River near Beatty, NV, and could impact waterbirds, the Amargosa toad, Oasis Valley speckled dace, two species of rare and endemic spring snails, neotropical migratory bird migration corridors, and breeding bird faunas. These resources should be described in detail and impacts described.
13.KE-23	Avian collision and electrocution should be analyzed. The transmission line would create a collision hazard for birds. A very tall transmission line (to 180 feet towers) would most likely kill a greater number of birds in our region.

CID	Wildlife Comments/Statements
13.KE-24	The line could run on the east shore of Walker Lake creating visual impacts and endangering avian fauna. Walker Lake has been identified as an Important Bird Area by the Audubon Society. Walker Lake lies at the terminus of the Walker River in Western Nevada. The Walker River is one of three major rivers that drain the east side of the Sierra-Nevada Mountains, and it supports riparian, wetland, riverine, and at its terminus, a desert lake ecosystem. Walker Lake itself is a remnant of ancient Lake Lahontan which covered much of central and northern Nevada during the last Ice Age. Walker Lake provides habitat to Western Snowy Plover, Common Loon, Western, Clarks, and Eared Grebes, Double-crested Cormorant, White-faced Ibis, Tundra Swan, Snow Goose, Gadwall, Redhead, Ruddy Duck, Northern Shoveler, and American White Pelican. Walker Lake is a bald eagle wintering area.
13.KE-25	The line could be built next to the Mason Valley National Wildlife Refuge and could also cause avian collision mortality for waterbirds.
13.KE-26	The Mojave Population of the Agassiz's desert tortoise was listed as Threatened by the US Fish and Wildlife Service (USFWS) in 1990 followed by the designation of critical habitat in 1994. In 2000, the USFWS began systematically surveying tortoise populations in critical habitat and recovery unit areas to determine population trends. Based on their findings (USFWS 2015), which are briefly summarized in the chart, we convinced that the Mojave Population of the Agassiz's desert tortoise should be federally listed as Endangered rather than Threatened. *[comment includes table]* The table includes the area of each Recovery Unit and Tortoise Conservation Area (TCA), percent of total habitat, density (number of breeding adults/km2 and standard errors = SE), and the percent change in population density between 2004 and 2014. Populations below the viable level of 3.9 breeding individuals/km2 (10 breeding individuals per mi2) (assumes a 1:1 sex ratio) and showing a decline from 2004 to 2014 are in red. The results of USFWS surveys show that 10 of 17 populations of the Mojave desert tortoise declined from 2004 to 2014, and 11 of 17 populations of the Mojave desert tortoise are no longer viable. The transmission project is not sited within Critical Habitat or a TCA, but this shows how much of a decline has occurred in those protected areas, and how tortoise habitat in other parts of the range of the species is equally important with densities that match Critical Habitat currently. A full analysis of impacts to tortoise should be included in the EIS, as this project has the potential to open up tens of thousands of acres of tortoise habitat to renewable energy development—a massive and significant impact.
13.KE-45	We are told that the Reno-Sparks industrial areas are growing, needing more energy. But what needs to be carefully analyzed is whether supplying more power could cause urbanization impacts to spill over into greater sage-grouse habitat just to the north of Reno and Sparks, in GHMA-designated public lands. Specifically new right-of-way for cell towers, more transmission infrastructure, roads, and even small projects that cause habitat degradation by a thousand cuts.
13.PG-10	The unique Amargosa River ecosystem in the Oasis Valley has high ecological value. We are concerned about the potential for this project to fragment the intact habitat behind the Bare Mountains and compromise the efforts of TNC and others to preserve and restore the area's ecological integrity and endemic species habitat.
13.PG-7	In these areas, the line would create a new linear disturbance resulting in potential for new impacts, such as habitat fragmentation, elevated perches for predator species, invasive and noxious weed propagation, a modified visual landscape, and an altered recreation setting.
14.CH-13	HTI/NATC and BAH have maintained large sections of their private property in as natural a habitat condition as possible. HTI/NA TC and BAH prohibit hunting on their prope1ties with exception of depredation tags as required for herd management, as this approach suppotis the growth of indigenous species in the area. Ce1tain areas on that private prope1ty and the surrounding locations have been identified as a natural cottonwood forest with the attendant range of wildlife species in these micro-climate areas. Within the proposed action, the powerlines would directly cross the Carson River in these locations, completely disrupting this natural habitat which has taken many years to protect.
14.CH-15	A portion of the proposed action route also passes through sensitive habitat for Greater Sage Grouse identified by the Nevada Division of Wildlife (NDOW) within Bull Canyon and Mineral Canyon. The BLM is urged to consider enforcing mitigation techniques for NV Energy such as those included in HTI's Land Use Permit (i.e. no vehicle presence during Greater Sage Grouse strutting and early brood rearing from March 1 to June 15, based on the reproductive cycle ofNevada sage grouse populations and on BLM management guidelines; and the strict regulation of no new surface disturbance - as the proposed action includes new road construction in this area for one of the access roads).
16.JB-1	Please reject the application for the Greenlink West Transmission Project. I write to you as a resident and protector of the southwest desert. I strongly encourage all government officials, all residents, all visitors and all who do business in the southwest avidly protect all southwest lands now and forever. Including all southwest animals and plants for all to thrive. Because of this deep commitment, I respectfully encourage you to reject the application for the Greenlink West Transmission Project. It threatens to harm wilderness, plants, animals, landscapes, views, historic and archeological sites, and even local businesses.
16.JB-4	The GWTP would threaten needed habitat and ecosystems for animals and Joshua Trees. The GWTP is proposed to be built through sensitive areas in the Mojave and Great Basin Deserts that is home for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees. This is wrong. It should be stopped.
16.JB-6	GWTP's line will damage wetlands along the Amargosa River near Beatty, NV. This will harm birds, plants and other animals needing those wetlands. The line would disturb a pronghorn fawning ground in Sarcobatus Flat, harming those deer, which cannot be replaced.
16.JB-7	GWTP threatens the east shore of Walker Lake, harming panoramas and landscapes, and endangering birds and other animals. Notably, bald eagles that spend the winters there.
16.JB-8	GWTP threatens to make extinct the Bi-State sage grouse, by disturbing important Bi-State sage grouse habitat in the Wassuk Range. The California/Nevada population numbers of this bird are just over 3,300. This is under the 5,000 threshold biologists say is needed to maintain the population.
16.JB-9	This project threatens to place large microwave towers along the length of the line, disturbing views, wilderness, and birdlife. One tower would rise near Gold Mountain, a Wilderness Study Area. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak. A tower would rise next to the Long Street Casino in Amargosa Valley, but the owners were not consulted. The line would impact views from the historic Ft. Churchill State Park. The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering birds, animals, and vistas.
19.JB-8	The additional destruction of the natural environment, including incalculable harm to rare flora and fauna, including Joshua trees, desert tortoise, sage grouse, desert bighorn and pronghorn antelope cannot be mitigated in any manner. Studies show that solar projects in Wyoming are already negatively impacting migration routes for the pronghorn antelope.
20.JD-2	The proposed Greenlink West project has already spawned over 200 square miles of new utility-scale solar projects, much on largely undisturbed land. If even half of them are developed, they will seriously and adversely impact wildlife, water supplies, archeological sites and view scapes

CID	Wildlife Comments/Statements
21.jGL-3	Greenlink West has generated great interest from the solar energy industry resulting in large utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for withdrawal of tens of thousands of acres of public land in the Amargosa, and Beatty areas. The BLM should conduct a study on the long-term impacts this would have to the local economy and the local flora and fauna.
21.JGL-7	Natural resources are critical to us and to Beatty residents' quality of life and economy. Greenlink West will cross land and wetland habitat that is home and range for a wide variety of flora, fauna, including a large number of species of aquatic birds. Hundreds of species of birds migrate through the Oasis Valley which has become named an important Bird Area by the Audubon Society. Bird watching has become an economic resource for Beatty. Visitors come to our town from all over the Nation and the world specifically to bird watch.
23.JH-4	Power lines are death traps for migrating birds that fly at night since the lines are invisible to them. This EIS needs to consider the impacts to migrating birds caused by the line and all its connecting lines. The lines following an east-west trajectory are especially dangerous to birds moving in a north-south direction.
23.NS-3	You know, I'm concerned about the ecosystem, because it is fragile. And I do have vultures that come by and drop in every once in a while to roost and the occasional badger and songbirds and the like. I would like to, you know, have whatever they do, make sure that, you know, those -- the wildlife, you know, has a place as well.
24.JM-1	We appreciate the BLM's efforts to engage with interested parties, such as TNC, early in process. On Monday in Las Vegas, we shared overarching concerns we have regarding habitat fragmentation, migratory bird flyways, and avoiding displacing wildlife and recreation areas with the transmission lines.
24.KB-7	The Tule Springs Fossil Beds provide "refugia" (Last Stand) habitat for wildlife, and keep wetlands and groundwater systems functioning. They contain archeological and paleontological sites, protected for decades, by Tribal authorities and individual researchers, waiting for future less-destructive, more effective technology, with which to access and read the fossil record, and study past seasons in a rechargeable environment. Not a place to send in heavy equipment, to build (increasingly unnecessary) utility scale industrial infrastructure.
24.KB-8	The Amargosa River has had too many intrusions and manipulations, already, for the convenience of surrounding mining and irrigation projects. Walker Lake is usually overdrawn, trying to keep its shoreline from falling, and doesn't need towers and transmission lines proliferating along the edge to emphasize a downgraded "Visual Resource Management Classification". The view changes, and possibilities for bird flyways through transmission lines would rate negative. Together, decades of Amargosa and Walker water, wildlife and plantlife recovery projects' databases might lose continuity, (slow to build and read) - because of permanent interruption by tower, lines and substation construction and maintenance work.
27.KB-12	Surrounding areas, especially Oasis Valley is key habitat & home to our endangered desert tortoise and countless other desert species, large and small. Drought and climate change is already driving desert species into this area from the increasingly dry areas further south.
27.KB-14	Specific wildlife concerns: baseline surveys are essential across all wildlife/avian concerns 1) Ravens: the predation advantage to ravens on both sage grouse and tortoise populations as mentioned in B.4.a., results in significantly increased raven populations as well as increasing their spacial distribution, simultaneous with significant decline in sage grouse and tortoise population viability. 2) The proposed route intersects habitats of both the sage grouse and desert tortoise. An alternate route must be evaluated and proposed to avoid these key habitat areas. Minimization by placement of raven perch deterrents is not adequate to prevent the decline of these 2 threatened species. 3) Migratory birds: must be surveyed so any route proposal avoids flyways, concentrated nesting areas and all water sources they depend upon. Disturbance must be relegated to previously disturbed areas. 4) Raptors: Golden eagles, hawks and peregrine falcons must be surveyed. Avoidance related to water sources such as mentioned in B.4.a. must be adhered to, as well as areas of high numbers of prey such as ground squirrels & known nesting areas. 5) Other species of concern such as burrowing owls, bats and both Dark & Kangaroo mice: baseline surveys need be conducted to determine areas of burrows, roosts & nests to be avoided and at what distance. 6) Critical indicator species of Spring snails and the Amargosa toad habitats must be completely avoided by adhering to the limitations on proximity to water sources mentioned in B.4.a. 7) Bighorn sheep lambing areas must be widely avoided. Again a science-based NDOW recommendation is essential.
27.KB-15	Indirect and cumulative effects of projects, proposed and future, along all 3 powerlines must not be split from the NEPA evaluation of a single powerline route. Each individual decision affects the future of our NV public lands landscapes, wildlife and multiple uses, but without considering the whole, no assessment of the magnitude of cost to NV into the future can accurately be made. Nor can impacts to NV 30x30 climate goals by above proposals be separated from the NEPA consideration of either. The current process is a "cart before the horse" proposition.
27.KB-4	These actions need be conducted before Greenlink West draft is presented to the public: a.) Consultation with NDOW in effort to make proposed route, sub-stations and projected energy or minerals projects along the route be the least impactful to wildlife & wildlife habitat resources. b.) An analysis and evaluation of the current Eastern NV transmission line to determine the cost/benefits to date. Inclusive in costs must be loss of potential tourism, 30x30 contributions and impacts to wildlife, wildlife habitats, cultural and historical resources. These must be not just from the line itself, but also from the attendant projects along the line, whether energy or minerals related. Science data from NDOW must be a key part of the analysis. To do so helps avoid unintended negative consequences from both the W & N proposals. It would provide a useful model for both what are best actions and which are negative.
27.KB-5	These actions need be taken to impart key information on maps of the draft proposal: a.) Visually indicate each route segment, sub-station, distribution lines, communications sites, access roads, projected energy or minerals projects along the line, that would fragment previously undisturbed parcels of public land. b.) Utilize data/maps from NDOW to indicate by overlay which areas are key wildlife habitat, which are of mid-range importance. Also current migration corridors, not only of mammals, but of migratory bird flyways. c.) Ditto for areas of highest cultural and historical importance. d.) All springs and riparian areas must be clearly specified on the maps.

CID	Wildlife Comments/Statements
27.KB-6	The proposed alternative should demonstrate a focus has been made to avoid or at very least minimize impacts to above B.2. a,b,c,d concerns. To do so: a.) Would include a key adherence to siting sub-stations far from potential impacts posed by any of the 4 major concerns above. b.) All routes must be along existing corridors. No route should be sited through previously unfragmented public lands. c.) Collectively, these sideboards would indicate acknowledgment of the truth that wildlife habitat cannot be re-created, nor the displacement of wildlife & avian populations that depend upon them, thus mitigation is not a realistic option. Avoidance must be the main objective, with minimization as second.
27.KB-7	Re: transmission lines in general: a.) Facilitate significant raven predation on threatened species: sage grouse and the desert tortoise, rendering precarious the viability of site specific populations. For this reason, all transmission lines must be a science-determined avoidance distance from springs, riparian & other moist areas. Since all species of animals and birds depend for health and population viability upon these precious areas, such avoidance alone would be beneficial to all wildlife. b.) Raptors are drawn to powerlines as perches and subject to death by electrocution. Raptor friendly design must be made standard.
27.KL-2	And how is it going to affect the wildlife?
27.KL-3	What about the wild horses, are you going to gather them up and send them to slaughter or are you going to leave them alone? Aren't they going to need to get them out of there more and more because you want to put this up there? Are you going to do a study on it and how it is going to impact the wildlife?
27.KL-4	Are you going to do a study on it and how it is going to impact the wildlife? Where can I find that?
27.PS-2	Specifically, I call attention to the bi-state sage grouse habitat that was identified in the East Walker Corridor, as well as Nevada bighorn habitat throughout that corridor. Excuse me, desert bighorn habitat.
28.KB-3	And I'm hoping that you'll be fully transparent about your coordination with NDOW and when has that happened from the very get-go with overlays of key habitat. Because, of course, my and my organization's interests are wildlife and wildlife habitat. And that habitat, once it's lost it can't be mitigated. We don't recreate that. So what we see is this big thing coming at us that is going to -- I want to say significantly, I was going to be way over, you know, go to massive. But different. Our public lands and our wildlife habitat will be changed significantly once all three of these projects are in place.
29.KE-4	The transmission line would also create a collision hazard for birds. Highway 95 traffic already does that, but a very tall transmission line would most likely kill a greater number of birds in our region.
29.KE-5	Please reject Alternative K for the Greenlink West Transmission Project in the Beatty/Oasis Valley area. The alternative would not benefit the community or any of the landowners in the area. It would degrade the view, lower property values, damage tourism potential, hurt the local economy, and create health and wildlife risks.
29.RL-1	And my big concern about this is that we're creating additional impacts to wildlife habitat. And it sounds like you've only done wildlife surveys for two wildlife species, when we have 760 species of wildlife in the State of Nevada. And there's very -- from what I can see from what you said so far, there's very little discussion about all the other wildlife resources that have a potential to be impacted.
32.KK-3	Second, the proposed Greenlinks west project would have huge impacts from its 469 miles of new transmission lines and substations. The list of impacts would include: Tule Springs Fossil Beds National Monument impacts on ice age fossils, wildlife and Native American cultural sites Mojave and Great Basin habitat for desert tortoise, Bi-state Sage grouse [ravens use raised structures to perch and prey on tortoise and grouse], pronghorn antelope, desert bighorn and Joshua trees visual impacts on places I and many others like to visit because of their scenic beauty -- DNWR, Mount Charleston and the Spring Mountains, and Walker Lake. The BLM would need to downgrade the Visual Resource Management Class of large parts of the Great Basin and Mojave Deserts. any new industrial scale solar plants on public land would have significant negative effects on water, air quality and scenic value.
33.LM-1	Please reject the Greenlink West Project. Not only will it use not-green fossil fuels, but it will destroy and/or damage precious, irreplaceable habitat, wildlife, native flora, fossils, and archeological/cultural sites.
33.LM-3	Please do the right thing and reject the so-called Greenlink West Project. It would benefit the increasingly-rich few, not the people who own the land, us. And it would do it in a way that would destroy precious land and habitat, land that would be gone forever.
35.MC-10	The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River, endangering avian fauna and visual resources..
35.MC-12	A number of 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas, negatively affecting plant and animal habitat.
35.MC-14	Because of these many impacts to biological, cultural, paleontological, archaeological, water, and visual resources the Greenlink West Transmission Project should be rejected.
35.MC-2	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
35.MC-4	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV, which will imnpact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
35.MC-7	The line would tear though important Bi-State sage grouse habitat in the Wassuk Range. This California/Nevada population numbers are just over 3,300 - below the 5,000 threshold biologists say is needed to maintain the population.
35.MC-8	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range
42.NS-8	I enjoy watching the birds, lizards and other wildlife that travels through this area. Measures need to be taken to ensure that the wildlife stays safe and does not leave the area. I am particularly concerned about the ravens and vultures because they like to land on top of poles / high places.
44.PS-2	The path of the Walker River Alternative for the Greenlink West Project would pass directly through priority habitat for the Bi-State Sage Grouse south of Mt. Grant. The proposal to list the Bi-State sage grouse under the Endangered Species Act was recently reinstated by the U.S. Fish and Wildlife Service, making conservation of this species especially important. Transmission lines adversely impact sage grouse populations by increasing predation rates on eggs and chicks from avian predators, like ravens. The negative impacts on sage grouse populations can extend 2.5 – 12.5 km from the transmission line1,2. Because the Walker River Alternative would pass within 1-8 km of several active Bi-State sage grouse breeding locations and have significant negative impacts on recreation in the East Walker River corridor, the Walker Basin Conservancy does not support this alternative.
47.RR-5	The line will be built through sensitive ecosystems in the Mojave Desert through habitat for desert tortoise, bighorn sheep, and Joshua trees.

CID	Wildlife Comments/Statements
47.RR-6	The line will cross over wetlands along the Amargosa River near Beatty, NV. The line will disrupt breeding habitat for pronghorn and will affect other species living on or near the river.
47.RR-7	The line will run on the east shore of Walker Lake creating visual impacts and endangering avian fauna.
50.KE-7	The line will go through two Bi-State Sage Grouse mapped habitats (near the Wassuk Range and Walker Lake). How would this be mitigated?
52.SN-10	On May 19, 2022, at the Reno public meeting, Greg Helseth, Branch Chief Renewable Energy, BLM Nevada State Office, repeatedly stated that the Greenlink West corridor would use existing transmission corridors with existing transmission lines. This statement is misleading because the 2016 Department of Energy, Section 368, Corridor 18-244 (aka Greenlink West) Study, Table 3-7, states that the corridor length is 244.18 miles (estimated) and the length of the transmission lines within the corridor is 96.3 miles. Based on these numbers, only 39% of the corridor is developed. This means that 61%, or 109 miles of the proposed route, does not contain existing transmission lines or surface infrastructure (roads, borrow pits, or substations). The section of the proposed corridor that we are concerned with (from Milepost 87 to Milepost 166) is essentially natural with virtually neither infrastructure nor developments. Over 100 miles of the proposed Greenlink Transmission Line utilizes an undeveloped ROW through intact natural public lands, which indicates that the BLM has not yet considered other viable corridors that can work to consolidate utilities and multimodal uses to reduce the unnecessary proliferation of dispersed rights-of-way. Statements like this without all the facts appear to intentionally reduce the perception of ecological and visual impacts that would occur from a project the size of Greenlink West. Further, when asked if the proposed Greenlink Transmission Corridor has been considered as part of a multimodal corridor, including looking at the proposed alignments of Interstate-11 along the majority of the corridor, Greg Helseth replied that Interstate 11 was a fantasy and would not be considered in the Greenlink Transmission EIS. While this project may or may not happen, these huge corridors need to be co-located and coordinated to reduce impacts. There is a court ordered Settlement Agreement for Section 368 Corridors to strive to reach the "diminution of the proliferation of dispersed rights-of-way (ROWs) crossing the landscape" [Wilderness Soc'y, et al. v. U.S. Dept of Interior, No. 3:09-cv-03048 JW Joint Motion to Dismiss Case Pursuant to Fed. R. Civ. P. 41(a)(2)] and recommendations of the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (see Table on page 30 for the 18-224 Nevada row, under the Recommended Revisions, Deletions, and Additions, & Rationale columns for recommendations on aligning 18-224 with the proposed I-11 corridor). Combining the Section 368 Greenlink Transmission Corridor with the proposed Interstate-11 Project would satisfy the court-ordered settlement and be in compliance with the most recent Section 368 Energy Corridor Review recommendations (which the BLM is party to). FNW REQUEST: Reduce/eliminate proliferation of rights-of-way, and use corridors with existing disturbance wherever feasible.
53.WB-11	Additionally, the Greenlink transmission line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources. This is one of the most beautiful and visually unimpacted areas in all of Nevada.
53.WB-4	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
53.WB-6	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will impact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
53.WB-7	The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area.
53.WB-8	The line would tear though important Bi-State sage grouse habitat in the Wassuk Range. This California/Nevada population numbers are just over 3,300 - below the 5,000 threshold biologists say is needed to maintain the population.
57.KD-3	Additionally approximately 10 years ago, the Vegas to Reno race required a detour from BLM due to the toads somewhere around Beatty. I want to ensure that you remember this and do not mess with the endangered toads habitat!! SAVE the Toads!!
62.CB-2	Tortoises, sage grouse, and other species are rapidly declining. We must protect and restore their habitats and not further degrade and fragment them.
62.CB-4	Power lines help ravens and ravens prey on young tortoises and sage grouse. Please do everything possible to avoid, reduce, and mitigate all potential adverse environmental impacts.
64.KF-7	Will the transmission line corridor avoid Bi-State Sage Grouse habitat, or will it go through it?
66.KE-3	Walker Lake is a wintering area for bald eagles. Is there concern that the line on the east shore of Walker Lake will result in kills for wintering bald eagles?
66.KE-5	There is an area near Sarcobatus Flat that is a pronghorn breeding area which looks like the powerline will be going right through. How will that be mitigated? Also, regarding Alternative K near Beatty, no landowners have been contacted, how many properties will it cross? Also, what is the logic of putting a powerline over an area of more meadows than the 7J Ranch. That creates an irresponsible fire hazard, is environmentally destructive, and causes safety risks to private landowners. I haven't heard until now that the military airspace is an issue. Why would you consider an alternative that would endanger the lives of private landowners?
68.JK-2	The proposed route will intersect both Mojave desert tortoise (desert tortoise) and Bi-State Distinct Population Segment (DPS) of sage-grouse habitats. The desert tortoise is currently federally listed as "threatened" under the Endangered Species Act (ESA), and the Bi-State DPS of sage-grouse was recently reinstated as an ESA proposed threatened species under recent federal court ruling. Both species are especially vulnerable to common raven depredation. Distribution and transmission line infrastructure provide increased perching and nesting subsidies for ravens, resulting in increased raven abundance, distribution, and the potential for adversely impacting species of heightened conservation management. Ravens are successful predators on sage-grouse nests and young desert tortoises leading to reduced survivorship, which cumulatively can have population-level impacts. The Department continues to recommend implementation of avoidance and minimization measures to address these impacts, including raven perch and nest deterrents and effective raven management for this project.
68.JK-3	Other species and habitat resources also have potential to be impacted, including (but not limited to): aquatic species including endemic fish and spring snails; species listed as Species of Greatest Conservation Need in the State of Nevada Wildlife Action Plan and as Sensitive Species by BLM Nevada such as dark and pale kangaroo mice, Amargosa toad, Gila monster; and bighorn sheep and associated habitats. The location and uninhibited access to natural springs and artificial waters by wildlife dependent on these resources is a concern.

CID	Wildlife Comments/Statements
68.JK-4	All birds protected under the Migratory Bird Treaty Act are also State Protected species (NAC 503.050). Recommended impact minimization measures for migratory birds include: • Ground disturbing activities Avoid bird breeding and nesting season which roughly occurs between March 1 and July 31. If this seasonal avoidance is not practicable, a qualified biologist must survey the project site prior to any ground disturbing activities to determine if nesting by migrants is underway. In the event an active nest (containing eggs or young) is discovered or frequently attended by adult birds, a buffer area around the nest appropriate for the involved species must be identified and avoided until young birds fledge. This measure would be consistent with preventive actions advocated by the U.S. Fish & Wildlife Service concerning migratory species protected under the Migratory Bird Treaty Act. • Electrocution Avoidance Standard, raptor-friendly designs as outlined in Suggested Practice for Raptor Protection on Power Lines (Avian Power Line Interaction Committee [APLIC] 2006, 1996; APLIC and U.S. Fish and Wildlife Service [USFWS] 2005) would be incorporated in the design of new electrical distribution lines to prevent electrocution of raptor species attempting to perch on the power poles and lines. • Springs, seeps, desert oasis, playas, marshes, wet meadow, aspen, cottonwood galleries, and other moist habitats Complete avoidance and appropriate buffers to reduce impacts to migratory birds and all wildlife. • Burrowing owls Recommend surveying the entire project area. Avoid burrows and ground squirrel colonies. • Brewer's sparrow, Le Conte's Thrasher, Loggerhead shrike, Pinyon jay, Sage thrasher, and other songbirds Recommend standard migratory bird point count surveys or transect surveys during breeding season. Minimize habitat loss by concentrating disturbance in previously disturbed areas, habitat restoration for habitat loss, design buildings with nonreflective surfaces (brown/tan/khaki paint) to reduce collision potential, no uncapped posts, building vents, etc that provide nest sites for cavity nesting birds such as European Starlings. • Ferruginous hawks Recommend standard raptor surveys as suspected ferruginous hawks are nesting in Joshua trees in northern edge of the Mojave Desert. The Department is aware of one nesting attempt in Joshua trees (2020). • Golden eagles, peregrine falcon, and other raptors Recommend standard eagle and raptor surveys be completed. Minimize electrocution hazards, avoid areas around water sources that concentrate raptors and other wildlife, reroute power line and other infrastructure away from concentrated prey populations such as ground squirrel colonies and known migration corridors. Winter raptor survey data may help identify potential high use areas.
68.JK-5	Bats and Abandoned Mine Lands (AML) We note there are AML features within the proposed project area. Abandoned mines provide potential roosting sites for 19 of Nevada's 23 bat species. We mention this for informational purposes relative to wildlife-compatible AML closures and public safety in developing the Greenlink West transmission line. Minimize AML closures and minimize improving roads that access AMLs. Avoid siting towers on or near cliff habitat suitable for bat roosting sites. Minimize exterior lighting. Avoid and maintain buffers around water sources and desert oasis.
68.JK-6	Dark Kangaroo Mouse (DKM) and Pale Kangaroo Mouse (PKM). Potential for PKM to occur in suitable habitats throughout the project area. Pale kangaroo mouse distribution occurs within the Greenlink West transmission line area from the Montezuma Microwave Site to the Wassuk Range and picks up again in Mason Valley. Known occupied habitats include: • Substation Alternative E1 is 2.5 miles east of know occupied PKM habitat and 1.5 miles northwest from another PKM site. All of which appear to be continuous habitats including the substation. Can the substation be moved to disturbed ground in Sodaville (approximately 5 miles north) or Mina (8 miles north)? • Substation Alternative E2 location is in largely undisturbed ground historically occupied by PKM. Can the substation and associated roads be moved 4 miles west to the disturbed ground at Material Yard 7 at Coaldale? • Substation Alternative E3 is approximately 4 miles south of historic PKM habitat at Alkali Lake. The substation is in higher elevations in more gravelly soils suggesting occupied PKM habitat is unlikely. However, the substation is in undisturbed ground, and we suggest moving it to previously disturbed ground. • Where transmission line crosses Highway 95 at the north end of Walker Lake, occupied PKM habitat is approximately 1.7 miles away on the Walker River Indian Reservation. This appears to be continuous habitat. • Spotted Range Microwave Site – about 3 miles to the northwest is a historic DKM record. Recommended PKM/DKM General Strategy Phase 1 Strategy - Project wide desktop GIS delineation of potential habitat and potentially degraded habitats using aerial photos, various available computer modeling efforts, known occurrences, soils/Ecologic Site Description mapping, etc. Phase 2 Strategy – Field verification of suitable habitat in concentrated use areas including alternate sites (substations, material yards, concentrated new road construction, etc.). Small mammal trapping should be conducted in field verified habitats. Please further coordinate with the Department concerning small mammal trapping. Phase 3 Strategy - Non-concentrated activities (individual power poles, maybe low-grade existing access roads, etc.) use results of Phase 1 assessment and assume presence for avoidance, minimization and/or mitigation purposes
70.RS-10	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
70.RS-12	The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
70.RS-14	The line would run on the east shore of Walker Lake creating visual impacts and endangering avian fauna - Walker Lake is a wintering bald eagle area.
70.RS-15	The line would tear though important Bi-State sage grouse habitat in the Wassuk Range. This California/Nevada population numbers are just over 3,300 - below the 5,000 threshold biologists say is needed to maintain the population.
70.RS-16	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak.
70.RS-18	The line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources..
70.RS-9	NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).

CID	Wildlife Comments/Statements
72.TD-1	The Sierra Club submits the following comments regarding the upcoming Environmental Impact Statement (EIS) for the proposed GreenLink West transmission line. Sierra Club is a tireless advocate for rapid decarbonization of the electric grid, and has a long history of clean energy advocacy in Nevada. We support the development of transmission infrastructure necessary to integrate renewable energy projects into the grid. However, we believe that both clean energy generation and transmission project siting should be carefully considered to avoid serious impacts on wildlife. The proposed GreenLink West transmission line will have a significant impact on the landscape and ecology in Nevada. The Bureau of Land Management should give preference to the lowest impact route.
74.PG-10	Alternative Analysis 3: alignments east of the Bare Mountains that would reconnect with Highway 95 approximately 16 miles north of Beatty (Alternatives 1–3 and NV Energy's proposed route) ▪ Findings: This series of proposed alternatives would increase landscape fragmentation by a mean of 5% (range 4.7% to 5.2%) or an average of 93 additional patches compared with baseline conditions. These alternatives would decrease median patch size by 4.2% (range 3.7% to 5.3%), which is the second highest decline of all the proposed alternatives. This suggests that large patches of habitat would be fragmented in this proposed alignment.
74.PG-11	Overall fragmentation analyses show all proposed alternative alignments would fragment the landscape in the Oasis Valley by between 4.7% and 7.5%. The fragmentation would reduce habitat patch sizes by between 3.7% and 6.2%, or a reduction in mean patch size of 14 acres, depending on the alternative. The alternative alignments to the east of the Bare Mountains would fragment larger patches relative to alignments through or around the Bullfrog Hills. This means the area west of the Bare Mountain area is relatively intact with few roads or other disturbances and has higher wildlife value. We encourage the BLM to evaluate additional alternatives through the Bull Frog Hills in the Draft EIS because the data suggests there is less likelihood for impacts from habitat fragmentation in that area compared with other alignments in the vicinity.
74.PG-12	Based on our knowledge of the area, priority habitats that should remain intact include wetlands associated with the Amargosa River and desert tortoise habitat. Proposed alternative alignments that cross the Amargosa River may negatively impact wetlands and wildlife associated with the river (e.g., Amargosa toad) and may also impact known desert tortoise habitat in the Oasis Valley. Alignments at higher elevations (>4,200 feet) will likely avoid most desert tortoise habitat and would reduce disturbance in wetlands and impacts on wildlife reliant on the wetlands.
74.PG-5	For example, placing the line along existing roadways and transmission lines minimizes new impacts. We strongly encourage the BLM and NV Energy to advance a preferred alternative that has all route segments directly paralleling existing linear disturbances. We offer the following input regarding three specific portions of the proposed line where analyzing additional alternatives may avoid unnecessary impacts on wildlife habitat and other conservation values.
74.PG-6	We appreciate the BLM's efforts thus far to explore a range of alternatives in the Beatty area. We recognize this area is heavily constrained with the Department of Defense land to the east and National Park Service land to the west. The Oasis Valley, north of Beatty, is the headwaters for the Amargosa River system. Avoiding further disturbance in the Amargosa River ecosystem is critical for protecting endemic species of wildlife and the wetlands that serve as stopping points for migrating wildlife. We are concerned about the potential for this project to fragment intact habitat behind the Bare Mountains and compromise the efforts of TNC and others to preserve and restore the area's ecological integrity and endemic species habitat.
74.PG-7	To understand the potential impacts of the proposed line on wildlife habitat in the Beatty area, TNC staff conducted a fragmentation analysis of three alternative alignments (see Figure 1 [Attached Figure 1] for a depiction of our analysis). The fragmentation analysis examines how linear features such as roads and transmission lines dissect the landscape to create patches of land isolated by disturbance. Landscape fragmentation reduces the size of habitat patches for wildlife and facilitates the establishment of invasive species and increases mortality of wildlife species, particularly slow-moving terrestrial species like the desert tortoise and Amargosa toad. Our findings for several possible alignment alternatives are below (alternative numbers listed correspond with Figure 2).
74.PG-9	Alternative Analysis 2: an alignment east of the Bare Mountains crossing Highway 95 approximately 1 mile north of Beatty (Alternative 4/BLM proposed Alternative F) ▪ Findings: This proposed alternative would increase landscape fragmentation by 6.9% compared with baseline conditions. This alternative would also decrease the median patch size by 6.2%, which is the largest decrease in patch size of any proposed alternative and suggests large patches of intact habitat would be fragmented with this alignment.
75.UNK-2	I believe that this development can and should be done through careful planning that includes the application of conservation biology and landscape ecology data and principles. Linear projects may have greater adverse impacts than more concentrated ones. Habitats may be fragmented and necessary wildlife movements blocked or hindered. Invasive plants may be spread and add to serious fire risks. Lands with protective legal designations should be respected.
77.TA-3	This Action traverses multiple wild horse and burro designated Herd Management Areas (HMAs), critical wildlife migration corridors, Greater Sage Grouse critical habitat, as well as critical habitat for a number of endangered and threatened species, including but not limited to; desert tortoise, bald/golden eagles, pygmy rabbits, and burrowing owls. This three-year plus Action will unquestionably have significant impact on these species and NEPA mandates their inclusion in the EIS evaluation.
77.TA-6	Specifically projects directly affecting resources and habitat for wild horses and burros, Greater Sage Grouse (GrSG), golden/bald eagles, elk, mule deer, pygmy rabbits, burrowing owls, and migratory birds, many of special and/or protected status. It is crucial for BLM to identify compounding impacts in this EIS. Please include appropriate science-based analysis.
77.TA-7	A Designation Complex of HMAs are located adjacent and within the propose Action areas. Yet BLM entirely omits mention of wild horses and burros within this EIS scoping plan. For proper evaluation of affects to wild horses and burros, BLM is legally obligated to have Herd Area Management Plans (HMAPs) in place as defined under 43CFR§§4710.3&4, as outlined in BLM's Wild Horses and Burros Management Handbook (Section 2.5.2), and as incorporated into BLM's Report to Congress: An Analysis of Achieving a Sustainable Wild Horse and Burro Program (BLM 2020 Plan). Predominantly, without existing or current HMAPs for each HMA or complex of HMAs there is no viable way to infer impact nor mitigate damages to wild horse populations from BLM proposed Action and subsequent EIS nor RMP amendments. An HMAP EA begins with scoping and defining management goals for a specific herd. Without the opportunity to participate in a scoping process, there is no opportunity for public participation in authentic management decision making. Furthermore, EIS considerations regarding wild horses and burros must conform to policy outlined in 43CFR§4700.0-6(a-d). At minimum, in light of the lack of HMAPs, the draft EIS must include all census data, seasonal use data, foaling season information, genetic data, and all data pertaining to wild horse use in, around, and through the project area and throughout the neighboring HMAs so that impact and appropriate mitigation measures can be analyzed and thoroughly addressed prior to finalization of the EIS. Please include appropriate science-based analysis.

CID	Wildlife Comments/Statements
77.TA-8	Helicopters and motorized vehicles used for employees and transport of equipment/goods will increase impacts and collisions with desert tortoise, wildlife, sage grouse, and wild horses and burros. Use of helicopters and motorized vehicles will additionally harass wild horses and burros protected from harassment as defined under Title 16 USC Chapter 30, §1331. Please include appropriate analysis.
77.TA-9	Greater Sage Grouse (GrSG) critical and identified priority habitat are within Action areas for solar zones and proposed and existing transmission project ROW (existing and proposed) and require judicious attention. The BLM acknowledges that their current plans (2015 & 2019 Sage-Grouse Plan Amendments) for the GrSG and sagebrush habitat are inconsistent with "new science and the rapid changes affecting" public land management. With forthcoming BLM 2021 Amendments to current GrSG plans (2015 & 2019 Sage-Grouse Plan Amendments) and the understanding that BLM is inconsistent with "new science and the rapid changes affecting" public land management, the proposed Action in this EIS demarcates potential "significant impact" to GrSG and critical lek habitat. The potential for GrSG listing as an endangered species exists and effects of the Action require analyses in any EIS utilizing up-to-date legitimate research. With impending BLM 2021 GrSG Management amendments, protections are required to safeguard GrSG, leks, and sagebrush habitat as if GrSG are classified as endangered species. Furthermore, transmission lines and pads will create a significant increase in GrSG predation by providing additional predator/raptor habitat and must be considered a direct impact to GrSG and lek safety and security. The State of Nevada's Conservation Credit System and ACEPMs may be deemed invalid under pending BLM GrSG Management Plans and will directly influence EIS proposed Action.
77.TA-11	Bald and Golden Eagles are protected as endangered species under the Endangered Species Act of 1973 (ESA), 16 U.S.C 1531-1544, 16 U.S.C. 668-668d and 50CFR§§17 and 22. The purpose of the ESA is, "to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved."
77.TA-12	Cumulative effects, defined under 50CFR§22.6, means "the incremental environmental impact or effect of the proposed action, together with impacts of past, present and reasonably foreseeable future actions." In order for U.S. Fish and Wildlife Service (USFWS) and BLM to appropriately analyze cumulative impacts to eagle populations from this proposed Action, cumulative analysis requires inclusion in the EIS. Please include appropriate science-based analysis.
77.TA-13	Data reported by the University of Minnesota Raptor Center (April 21, 2022; Minneapolis Star Tribune) confirms 16 owls, 13 bald eagles, and 7 red-tailed hawks have died of the bird flu as of that date. University of Minnesota Raptor Center states that Bird Flu is uncontrollably spreading throughout the United States. Montana also reports substantial raptor deaths from Bird Flu, a rampant disease. EIS data must include potential and current impacts of Bird Flu on bald/golden eagles, western burrowing owls, and all other raptors within Nevada and around the Action project. Please include appropriate science-based analysis.
77.TA-18	Climate change and impacts to surface/ground water, wetlands, and washes and all other water loss impacts to neighboring populations and wildlife, especially during times of significant drought, demand evaluation of impacts from proposed Action to all wildlife/reptiles/raptors/pygmy rabbits, rangeland health, sagebrush habitat, and wild horses and burros reflected in the forthcoming EIS. Please include appropriate science-based analysis.
81.CO.-14	Landscape-level concerns transcend agency boundaries. Public lands surrounding the Greenlink West Project provide critical habitat connections to a number of wildlife associated with the NPS including the desert tortoise and bighorn sheep. Issue: The NPS is concerned with the loss of habitat or connectivity resulting from the construction of towers, new roads and cleared areas. These changes to the landscape could negatively impact important and sensitive species, such as Gila monster, desert tortoise, Le Conte's thrasher, Western burrowing owl, desert kit fox, and bighorn sheep, by destroying or fragmenting habitat. Introduced invasive weeds also have the potential to spread and outcompete with native species and alter the ecosystem. Recommendation: The NPS recommends analyzing impacts to connectivity for wildlife at Death Valley NP and Tule Springs Fossil Beds NM – in particular, species that move among the south and north units of the NM. Climate change effects on habitat and movement should also be analyzed in the EIS.
81.CO-15	Death Valley NP offers a wide diversity of habitats resulting in a high biodiversity of bird species. 350 species of birds have been documented at the park including 14 species of raptors that are resident year-round. Sensitive birds such as Le Conte's thrasher and Western burrowing owls also occur at Tule Springs Fossil Beds NM. Issue: Construction activities resulting from the Greenlink West Project can pose direct (i.e., mortality) and indirect (i.e., nest abandonment) impacts to resident birds. In addition, transmission lines pose electrocution and collision risks to birds. The transmission line would introduce new collision risk to raptors and other birds that are found at Death Valley NP as well as Tule Springs Fossil Beds NM. Recommendation: The Migratory Bird Treaty Act of 1918 protects the take of protected migratory bird species without prior authorization by the U.S. Fish and Wildlife Service (USFWS). The NPS recommends limiting ground-disturbing activities during the migratory bird breeding season, which generally occurs March 1 to July 31 in Nevada (USFWS). The NPS recommends that historic breeding seasons be used as a starting point for ground-disturbing activity limitations, but that surveys are conducted to detect birds breeding outside the historic season due to climate change. The NPS also supports recommendations from the Avian Power Line Interaction Committee to reduce mortality of birds around transmission lines and associated infrastructure.

CID	Wildlife Comments/Statements
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).

CID	Federally Listed Species Comments/Statements
06.CVW-3	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees
06.JM-8	Oasis Valley is known to be at the northern range of the desert tortoise habitat. As temperatures warm in the southwest, this area will increasingly be an important refuge for the tortoise and it is crucial to their survival. Hence, in siting new linear disturbances, it is important to colocate linear disturbances to avoid fragmentation of their future habitat.
09.LO-4	This area is crucial to tortoise survival. This is it. This is where they're at. This is what's left. And our survival when we allow the blading of so many acres of Mojave habitat.
10.ELR-4	Proposed Action and Alternatives Considered – We note that a federal appellate court has previously ruled that in an EIS, a federal agency must evaluate a reasonable range of alternatives to the project including other sites, and must give adequate consideration to the public's needs and objectives in balancing ecological protection with the purpose of the proposed project, along with adequately addressing the proposed project's impacts on the desert's sensitive ecological system [National Parks & Conservation Association v. Bureau of Land Management, Ninth Cir. Dkt Nos. 05-56814 et seq. (11/10/09)]. Therefore, the Council requests that the BLM develop and analyze other viable alternatives, which we believe constitute "other reasonable courses of actions" (40 CFR 1508.25). Other viable alternatives should include at least one environmentally preferred alternative that avoids and substantially reduces impacts to biological resources and thus provides a greater level of ecological protection especially for the threatened Mojave desert tortoise and its habitat, including linkage habitat needed for survival and recovery (see Averill-Murray et al. 2013, 2021). For example, one alternative analyzed in the DEIS would be a route that follows and is located immediately adjacent to existing major highways.
10.ELR-7	It is our assumption that BLM will consult with the United States Fish and Wildlife Service (USFWS) to determine portions of the ROW that are in tortoise habitat and therefore warrant protocol desert tortoise pre-project and, if constructed 10.ELR-7in tortoise habitat, clearance surveys (USFWS 2019). Given that the central and northern parts of the ROW are outside tortoise habitats, it is important to determine those areas that would and would not be surveyed, which should be verified by knowledgeable biologists from the USFWS, likely the Southern Nevada Fish and Wildlife Office in Las Vegas.
10.ELR-8	Once protocol surveys for the tortoise are completed and all tortoise sign has been mapped, it is important that these results be shared with the contractor and particularly field-based construction personnel. In those areas that are apparently occupied by denser tortoise concentrations, BLM should increase protective measures during construction and operations and maintenance, like reduced speed limits (15 miles per hour is recommended), designated routes of travel blocked from public access and no vehicle travel by the public would be allowed, and perhaps structurally-different facilities. An example of the last type of protective measure would be in those portions of the ROW in tortoise habitats, we recommend that transmission poles or towers be designed to limit new raven nesting opportunities.
10.ELR-9	In the NOI, the BLM says the demand for electricity is expected to increase substantially in northern Nevada and the proposed project would help deliver this increased demand from southern Nevada. This wording in the NOI indicates that the proposed project will have growth-inducing impacts. These impacts should be described and analyzed in the DEIS. In addition, it suggests that the overall energy plan is to develop addition solar energy Desert Tortoise Council/Comments/Greenlink West Project.6-1-2022 5 facilities in southern Nevada to provide energy to both southern and northern Nevada. As such, the DEIS should describe and analyze tortoise habitats that may be lost to future residential, commercial, renewable energy, and other human development resulting from this project that will take solar energy generated from southern Nevada to northern Nevada.
10.ELR-10	Please include in your impacts analyses those foreseeable projects that would not occur but for this project. Too often analyses limit direct and indirect impacts to the physical disturbances at the bases of transmission poles or as the result of new access roads, for example, and report acreages for those obvious project-related losses. For this project, we ask that the DEIS divulge the full extent of impacts and report acreages of all tortoise habitats, including linkage habitats, that will be temporarily and permanently degraded/lost as the direct result of this project, including renewable energy development that is contingent upon completion of the transmission line. The EIS should include the time needed for degraded/lost habitats to return to pre-project conditions with respect to functions and values. Frequently temporal loss is not included in the analysis of impacts and therefore not considered in the development of appropriate mitigation to offset those impacts.
10.ELR-11	The future use of access roads by the public should be analyzed in the EIS. In other parts of the Mojave Desert, the construction of utility access roads has resulted in public use of these now deemed OHV roads and establishment of new unauthorized OHV roads diverting from access roads into previously undisturbed tortoise habitat. The myriad of impacts of human access using vehicles to the tortoise and tortoise habitat are well-documented in the scientific literature and summarized in Tracy et al. (2004) as part of the "threats network" to the tortoise. BLM should ensure that all impacts from creation and use of access roads by the Proponent and other are analyzed as part of the but for analysis, and that appropriate mitigation is implemented to prevent public use of access roads and establishment of new roads.
10.ELR-12	The DEIS should include appropriate mitigation for all direct, indirect, and cumulative effects to the tortoise and its habitats, including temporal impacts; the mitigation should use the best available science with a commitment to implement the mitigation commensurate with or prior to impacts to the tortoise and its habitats both within the ROW and in affected adjacent areas. Mitigation should include a fully-developed desert tortoise translocation plan; predator (e.g. raven, coyote, etc.) management plan; invasive weed management plan; tortoise habitat fire prevention management plan; compensation plan for the degradation and loss of tortoise habitat that includes protection of the acquired, improved, and restored habitat in perpetuity for the tortoise from future development and human use; a plan to protect tortoise translocation area(s) from future development and human use in perpetuity; and habitat restoration plan when the lease is terminated and the proposed project is decommissioned.
10.ELR-14	Mitigation Implementation, Success Criteria, and Monitoring – These mitigation plans should include an implementation schedule that is tied to key actions of the construction, operation, maintenance, and restoration phases of the project so that mitigation occurs concurrently with or in advance of the impacts. The plans should specify success criteria, include a monitoring plan to collect data to determine whether success criteria have been met, and identify actions that would be required if the mitigation measures do not meet the success criteria. Monitoring is crucial to determining the effectiveness of mitigation measures. Consequently, we request that BLM demonstrate throughout the EIS how it is complying with its monitoring requirements (see Chapter 11 Monitoring in BLM's NEPA Handbook – BLM 2008b) especially for indirect impacts to the tortoise and tortoise habitat.
10.ELR-15	Analysis of Status and Trend of Mojave Desert Tortoise – The DEIS should include a thorough analysis and discussion of the status and trend of the tortoise in the action area, which extends beyond the ROW, tortoise conservation area(s), recovery unit(s), and range wide. Tied to this analysis should be a discussion of all likely sources of mortality for the tortoise and degradation and loss of habitat both within the ROW and on lands that will be developed as a result of this project. Please see the Attachment, Appendix A. Status of the Mojave Desert Tortoise (Gopherus agassizii), for a summary of the status including data from USFWS and Allison and McLuckie 2018.

CID	Federally Listed Species Comments/Statements
10-ELR.16	The DEIS should analyze whether this new transmission line would result in an increase of common ravens and other predators of the desert tortoise in the affected regions. For example, common ravens are known predators of the tortoise, and use transmission and distribution lines as structures for nesting and hunting (Lovich and Bainbridge 1999). During construction, operations and maintenance, and if appropriate, decommissioning of the proposed action, BLM should require science-based monitoring of tortoise predation and managing it to pre-project levels. The monitoring and management plan should implement actions that would eliminate human subsidies associated with transmission lines such as food, water, and sites for nesting, roosting, and perching and address its effectiveness at a local, regional, and range wide level for the tortoise. It is very important that in tortoise habitats, the Proponent use towers for transmission and distribution lines with a design that prevent raven nesting. For example, the tubular design or monopole with insulators on horizontal or downward sloping cross arms is preferable, as this design reduces the availability of nesting and roosting substrates for common ravens that lattice towers provide. Lattice towers should not be used. Please ensure that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a projectspecific management plan for common ravens. This template includes sections on construction, operation, maintenance, and decommissioning (including restoration) with monitoring and adaptive management during each project phase (USFWS 2010).
10.ELR-17	We request that the DEIS address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the Project that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires, and how the proposed action would increase the occurrence of off-highway vehicle use on the access roads and unauthorized roads. We strongly urge the Proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires and other impacts associated with authorized and unauthorized vehicle use in the desert off of highways. The plan should integrate vegetation management with fire management and fire response.
10.ELR-18	In the cumulative effects analysis of the DEIS, please ensure that the Council on Environmental Quality's (CEQ) "Considering Cumulative Effects under the National Environmental Policy Act" (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, "Determining the cumulative environmental consequences of an action requires delineating the cause-and-effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects." The analysis "must describe the response of the resource to this environmental change." Cumulative impact analysis should "address the sustainability of resources, ecosystems, and human communities." For example, the DEIS should include data on the estimated number of acres of tortoise habitats and the numbers of tortoises that may be lost to growth-inducing impacts along the entire length of the alignment.
10.ELR-19 Part 1	These eight principles listed below: 1. Cumulative effects are caused by the aggregate of past, present, and reasonable future actions. The effects of a proposed action on a given resource, ecosystem, and human community, include the present and future effects added to the effects that have taken place in the past. Such cumulative effects must also be added to the effects (past, present, and future) caused by all other actions that affect the same resource. 2. Cumulative effects are the total effect, including both direct and indirect effects, on a given resource, ecosystem, and human community of all actions taken, no matter who (federal, non-federal, or private) has taken the actions. Individual effects from disparate activities may add up or interact to cause additional effects not apparent when looking at the individual effect at one time. The additional effects contributed by actions unrelated to the proposed action must be included in the analysis of cumulative effects. Desert Tortoise Council/Comments/Greenlink West Project.6-1-2022 8 3. Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected.Environmental effects are often evaluated from the perspective of the proposed action. Analyzing cumulative effects requires focusing on the resources, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects. 4. It is not practical to analyze the cumulative effects of an action on the universe; the list of environmental effects must focus on those that are truly meaningful. For cumulative effects analysis to help the decision maker and inform interested parties, it must be limited through scoping to effects that can be evaluated meaningfully. The boundaries for evaluating cumulative effects should be expanded to the point at which the resource is no longer affected significantly or the effects are no longer of interest to the affected parties.
10.ELR-19 Part 2	5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries. Resources are typically demarcated according to agency responsibilities, county lines, grazing allotments, or other administrative boundaries. Because natural and sociocultural resources are not usually so aligned, each political entity actually manages only a piece of the affected resource or ecosystem. Cumulative effects analysis on natural systems must use natural ecological boundaries and analysis of human communities must use actual sociocultural boundaries to ensure including all effects. 6. Cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects. Repeated actions may cause effects to build up through simple addition (more and more of the same type of effect), and the same or different actions may produce effects that interact to produce cumulative effects greater than the sum of the effects. 7. Cumulative effects may last for many years beyond the life of the action that caused the effects. Some actions cause damage lasting far longer than the life of the action itself (e.g., acid mine damage, radioactive waste contamination, species extinctions). Cumulative effects analysis needs to apply the best science and forecasting techniques to assess potential catastrophic consequences in the future. 8. Each affected resource, ecosystem, and human community must be analyzed in terms of its capacity to accommodate additional effects, based on its own time and space parameters. Analysts tend to think in terms of how the resource, ecosystem, and human community will be modified given the action's development needs. The most effective cumulative effects analysis focuses on what is needed to ensure long-term productivity or sustainability of the resource. We request that this analysis focus especially on numbers 3, 6, 7, and 8 for the Mojave desert tortoise.

CID	Federally Listed Species Comments/Statements
10.ELR-20	Assuming that tortoises occur along/near the alignment and that a formal Section 7 consultation results in issuance of a biological opinion, please be aware of the following requirements. Section 7(a)(1) of the Federal Endangered Species Act (FESA) states that all federal agencies "…shall… utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to Section 4 of this Act." In Section 3 of the FESA, "conserve," "conserving," and "conservation" mean "to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary. Such methods and procedures include, but are not limited to, all activities associated with scientific resources management such as research, census, law enforcement, habitat acquisition…" The Council believes that tortoise trend data (Allison and McLuckie 2018) demonstrate that BLM's management of the Mojave desert tortoise and its habitat has not been effective in meeting BLM's Section 7(a)(1) mandate of carrying out programs for its conservation. To meet its Section 7(a)(1) responsibilities, the BLM needs to adopt and implement management actions similar to those of the National Park Service (NPS). The NPS' land management practices are closer to managing areas of land as reserves, which is what the 1994 Recovery Plan (USFWS 1994b) described as part of the recovery strategy for the Mojave desert tortoise. While BLM designated Desert Wildlife Management Areas (DWMAs) as one part of the recovery strategy, it has not thoroughly implemented other parts of the recovery strategy. According to the Recovery Plan, DWMAs were to be managed as reserves; that is, they were areas of land to keep, save, preserve, or protect. BLM did not identify and implement needed recovery actions within each DWMA to manage the DWMAs as protected areas for the Mojave desert tortoise.
10.ELR-21	We appreciate this opportunity to provide input and trust that our comments will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the Desert Tortoise Council wants to be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises. We would like to receive notification from the BLM when an action that is proposed in the range of the tortoise and may be authorized, funded, or carried out by BLM. In addition, we request that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we ask that you respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this project.
13.KE-18	Lakes, wetlands, rare plant communities, Joshua tree habitats, Mojave desert tortoise, sage-grouse, and many other high-value natural resources will be significantly impacted by this transmission line proposal and connected utility-scale energy-sprawl projects.
13.KE-19	Constructing the line will require new roads and extensive cleared areas. This will impact species like burrowing owls, desert tortoise, kit fox, American badger, Western Joshua tree, Las Vegas bear poppy, Las Vegas buckwheat and other rare plants. The EIS should map and detail all sensitive, rare, and threatened and endangered species along the proposed route.
16.JB-4	The GWTP would threaten needed habitat and ecosystems for animals and Joshua Trees. The GWTP is proposed to be built through sensitive areas in the Mojave and Great Basin Deserts that is home for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees. This is wrong. It should be stopped.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
19.JB-8	The additional destruction of the natural environment, including incalculable harm to rare flora and fauna, including Joshua trees, desert tortoise, sage grouse, desert bighorn and pronghorn antelope cannot be mitigated in any manner. Studies show that solar projects in Wyoming are already negatively impacting migration routes for the pronghorn antelope.
27.KB-7	Transmission lines in general: a) Facilitate significant raven predation on threatened species: sage grouse and the desert tortoise, rendering precarious the viability of site specific populations. For this reason, all transmission lines must be a science-determined avoidance distance from springs, riparian & other moist areas. Since all species of animals and birds depend for health and population viability upon these precious areas, such avoidance alone would be beneficial to all wildlife. b.) Raptors are drawn to powerlines as perches and subject to death by electrocution. Raptor friendly design must be made standard.
27.KB-12	Surrounding areas, especially Oasis Valley is key habitat & home to our endangered desert tortoise and countless other desert species, large and small. Drought and climate change is already driving desert species into this area from the increasingly dry areas further south.
27.KB-14	Specific wildlife concerns: baseline surveys are essential across all wildlife/avian concerns 1) Ravens: the predation advantage to ravens on both sage grouse and tortoise populations as mentioned in B.4.a., results in significantly increased raven populations as well as increasing their spacial distribution, simultaneous with significant decline in sage grouse and tortoise population viability. 2) The proposed route intersects habitats of both the sage grouse and desert tortoise. An alternate route must be evaluated and proposed to avoid these key habitat areas. Minimization by placement of raven perch deterrents is not adequate to prevent the decline of these 2 threatened species. 3) Migratory birds: must be surveyed so any route proposal avoids flyways, concentrated nesting areas and all water sources they depend upon. Disturbance must be relegated to previously disturbed areas. 4) Raptors: Golden eagles, hawks and peregrine falcons must be surveyed. Avoidance related to water sources such as mentioned in B.4.a. must be adhered to, as well as areas of high numbers of prey such as ground squirrels & known nesting areas. 5) Other species of concern such as burrowing owls, bats and both Dark & Kangaroo mice: baseline surveys need be conducted to determine areas of burrows, roosts & nests to be avoided and at what distance. 6) Critical indicator species of Spring snails and the Amargosa toad habitats must be completely avoided by adhering to the limitations on proximity to water sources mentioned in B.4.a. 7) Bighorn sheep lambing areas must be widely avoided. Again a science-based NDOW recommendation is essential.
32.KK-3	The proposed Greenlinks west project would have huge impacts from its 469 miles of new transmission lines and substations. The list of impacts would include: Tule Springs Fossil Beds National Monument impacts on ice age fossils, wildlife and Native American cultural sites Mojave and Great Basin habitat for desert tortoise, Bi-state Sage grouse [ravens use raised structures to perch and prey on tortoise and grouse], pronghorn antelope, desert bighorn and Joshua trees visual impacts on places I and many others like to visit because of their scenic beauty -- DNWR, Mount Charleston and the Spring Mountains, and Walker Lake. The BLM would need to downgrade the Visual Resource Management Class of large parts of the Great Basin and Mojave Deserts. any new industrial scale solar plants on public land would have significant negative effects on water, air quality and scenic value.
35.MC-2	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.

CID	Federally Listed Species Comments/Statements
44.PS-4	In connecting new transmission lines to the expanded Fort Churchill substation, multiple alternatives pass through the Mason Valley Wildlife Management Area. Again, the Conservancy encourages the use of existing transmission corridors and direct consultation with the Nevada Department of Wildlife to select the route with minimal impact on sensitive species. Specifically, 2016 surveys found yellow-billed cuckoos at the Management Area, and we suggest evaluating measures to reduce predation from new transmission lines.
47.RR-5	The line will be built through sensitive ecosystems in the Mojave Desert through habitat for desert tortoise, bighorn sheep, and Joshua trees.
49.RS-1	I am very concerned that this massive proposed Greenlink project is likely to destroy, degrade, and fragment threatened Mojave desert tortoise habitats. Linear projects like this one are known to be especially harmful to tortoise habitats. Aside from the direct adverse impacts from construction and maintenance activities, there would be significant indirect and cumulative adverse impacts on tortoises. For example, power poles and lines, along with substations and other structures, provide artificial roost sites for ravens. Increased construction related road traffic also increases road kills, and construction crews may leave behind litter or garbage. All of these things "subsidize" ravens and increase their populations. In turn, ravens then increase predation on tortoise hatchlings and juveniles. Raven predation can significantly reduce tortoise populations over time, perhaps leading to extirpations if the younger age classes are gone.
49.RS-2	There are some mitigation measures, such as promptly removing road kills, litter, and garbage, trying to raven-proof structures, and using drones to oil eggs in raven nests. While these measures - if properly and consistently implemented - may reduce tortoise mortality, they won't stop some from occurring. Relocating tortoises in harm's way may save some but not all of the tortoises that may otherwise be killed. Where some tortoise mortality or habitat loss occurs, there should be full compensation to advance tangible tortoise conservation in other locations. For example, when a huge new natural gas pipeline was constructed through key sage grouse habitat, some mitigation compensation funds were used to do voluntary buyouts of BLM livestock grazing permits in sage grouse areas. This same mitigation could help tortoises, as BLM unfortunately still allows harmful commercial livestock grazing in some tortoise habitats. Mitigation funds could also be used to plant native vegetation in areas where one or more cheatgrass fires occurred in tortoise habitats. Some of these types of projects have already been successful, often when pre-emergent herbicides are used to knock down germinating cheatgrass and then native seeds and/or plants are put in. Of course, livestock grazing should not occur in these treatment areas because it would decrease the native forage and increase ground disturbance and cheatgrass proliferation.
49.RS-3	If power lines are constructed through tortoise habitats, there should not be ground clearing and native vegetation removal under these lines. Ground clearing brings in cheatgrass and other invasives that greatly increase the risk for spreading devastating fires. If heavy cheatgrass is not present, most native Mojave desert vegetation is sparse and spaced in a way that a downed power line is much less likely to start a serious fire. If native vegetation under power lines is removed, this may also create a de facto barrier that tortoises may not cross and therefore this could isolate tortoise populations and perhaps lead to harmful inbreeding depression. Please carefully review the attached documents. Some relate to studies of how roads harm tortoises, but these are relevant because they explain how linear disturbances cause significant direct, indirect, and cumulative adverse impacts on tortoises. Indeed, linear projects may harm tortoises over a great setback distance of perhaps a mile or more. I hereby wish to incorporate these attachments by reference as part of my official scoping comments. BLM has an affirmative duty under the Endangered Species Act to work for the conservation and recovery of all listed species including the Mojave desert tortoise. Thus far, BLM has not fulfilled that duty because it continues to approve many harmful projects in tortoise habitats. This has greatly contributed to the rapid decline of most tortoise populations, including some that are likely already below the level for future viability. California BLM at least prepared a comprehensive plan for renewable energy projects in the Mojave desert that included tortoise conservation decisions. Nevada BLM, to their shame, has not done so. I urge BLM to do everything possible to increase protection for tortoises and their habitats. I may augment my scoping comments by the deadline. Thank you very much for your consideration. (Comment includes five attachments: DTC #Abella and Berry 2016; DTC #Road Impacts Bibliography; DTC 2016 Berry et al Annotated Biblio _1991-2015 Desert Tortoises; DTC 2019_Berry and Murphy_CRM_5_109_agassizii; DTC Allison and McLuckie.2018.Popln trends in MDT.)
53.WB-4	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
62.CB-2	Tortoises, sage grouse, and other species are rapidly declining. We must protect and restore their habitats and not further degrade and fragment them.
62.CB-4	Power lines help ravens and ravens prey on young tortoises and sage grouse. Please do everything possible to avoid, reduce, and mitigate all potential adverse environmental impacts.
68.JK-2	The proposed route will intersect both Mojave desert tortoise (desert tortoise) and Bi-State Distinct Population Segment (DPS) of sage-grouse habitats. The desert tortoise is currently federally listed as “threatened” under the Endangered Species Act (ESA), and the Bi-State DPS of sage-grouse was recently reinstated as an ESA proposed threatened species under recent federal court ruling. Both species are especially vulnerable to common raven depredation. Distribution and transmission line infrastructure provide increased perching and nesting subsidies for ravens, resulting in increased raven abundance, distribution, and the potential for adversely impacting species of heightened conservation management. Ravens are successful predators on sage-grouse nests and young desert tortoises leading to reduced survivorship, which cumulatively can have population-level impacts. The Department continues to recommend implementation of avoidance and minimization measures to address these impacts, including raven perch and nest deterrents and effective raven management for this project.
70.RS-10	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
74.PG-12	Based on our knowledge of the area, priority habitats that should remain intact include wetlands associated with the Amargosa River and desert tortoise habitat. Proposed alternative alignments that cross the Amargosa River may negatively impact wetlands and wildlife associated with the river (e.g., Amargosa toad) and may also impact known desert tortoise habitat in the Oasis Valley. Alignments at higher elevations (>4,200 feet) will likely avoid most desert tortoise habitat and would reduce disturbance in wetlands and impacts on wildlife reliant on the wetlands.
77.TA-3	This Action traverses multiple wild horse and burro designated Herd Management Areas (HMAs), critical wildlife migration corridors, Greater Sage Grouse critical habitat, as well as critical habitat for a number of endangered and threatened species, including but not limited to; desert tortoise, bald/golden eagles, pygmy rabbits, and burrowing owls. This three-year plus Action will unquestionably have significant impact on these species and NEPA mandates their inclusion in the EIS evaluation.
77.TA-8	Helicopters and motorized vehicles used for employees and transport of equipment/goods will increase impacts and collisions with desert tortoise, wildlife, sage grouse, and wild horses and burros. Use of helicopters and motorized vehicles will additionally harass wild horses and burros protected from harassment as defined under Title 16 USC Chapter 30, §1331. Please include appropriate analysis.
77.TA-14	Under 50CFR§17, USFWS is required to inventory and delineate any endangered or threatened plants and biome within this EIS proposed action.

CID	Federally Listed Species Comments/Statements
81.CO-14	Landscape-level concerns transcend agency boundaries. Public lands surrounding the Greenlink West Project provide critical habitat connections to a number of wildlife associated with the NPS including the desert tortoise and bighorn sheep. Issue: The NPS is concerned with the loss of habitat or connectivity resulting from the construction of towers, new roads and cleared areas. These changes to the landscape could negatively impact important and sensitive species, such as Gila monster, desert tortoise, Le Conte's thrasher, Western burrowing owl, desert kit fox, and bighorn sheep, by destroying or fragmenting habitat. Introduced invasive weeds also have the potential to spread and outcompete with native species and alter the ecosystem. Recommendation: The NPS recommends analyzing impacts to connectivity for wildlife at Death Valley NP and Tule Springs Fossil Beds NM – in particular, species that move among the south and north units of the NM. Climate change effects on habitat and movement should also be analyzed in the EIS.

CID	Recreation Comments/Statements
01.RAM-5	We are aware that the BLM may propose Recreation Management Plan (RMP) Amendments during this process. We anticipate our multi use recreational routes and points of interest will be impacted b by the Greenlink West Project on all of the proposed alternatives. We request that you analyze them for potential conflicts to identify and propose continuity solutions, including the possibility of special land use designations such as a Special Recreation Area. To assist you in your analysis we are including the following information about our routes and the points of interest in the forms of, a paper map, KMZ file, and a listing of points of interest with their GPS locations. Please contact us with any questions you may have about this information.
01.RAM-10	There may be an opportunity to leverage them for outdoor recreation opportunities at the completion of construction for activities such as organized high speed racing events, organized outback t ours, and independent exploration. They may also provide a community connectivity option for outback explorers.
02.SP-2	The alternative would potentially harm our property values as it would be visually unattractive and the impact to our local view will also degrade our quality of life. The Oasis Valley and Beatty area is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching.
02.SP-19	The Town started its digital marketing campaign which included a new Facebook page focused on outdoor recreation, the Town website was modified to put outdoor recreation front and center on its homepage and other digital marketing tools were used to get the word out about Beatty. This campaign is ongoing today.
04.BTAB-5	We are aware that the BLM may propose Recreation Management Plan (RMP) Amendments during this process. We anticipate our multi use recreational routes and points of interest will be impacted b by the Greenlink West Project on all of the proposed alternatives. We request that you analyze them for potential conflicts to identify and propose continuity solutions, including the possibility of special land use designations such as a Special Recreation Area. To assist you in your analysis we are including the following information about our routes and the points of interest in the forms of, a paper map, KMZ file, and a listing of points of interest with their GPS locations. Please contact us with any questions you may have about this information.
04.BTAB-10	There may be an opportunity to leverage them for outdoor recreation opportunities at the completion of construction for activities such as organized high speed racing events, organized outback t ours, and independent exploration. They may also provide a community connectivity option for outback explorers.
04.HG-3	And then the path of destruction crosses the Wassuk Range towards the East Walker River. The A Alternative or -- or it was alsocalled Orange M in one of the things I looked at -- runs right along the East Walker River next to a newly created state recreation area. No. Just no.
04.HG-6	Lines are proposed crossing and paralleling the Carson River through the backcountry where it's far from the highway. This is a popular recreational route between Dayton and Fort Churchill along the river and along the dirt roads.
10.ELR-17	We request that the DEIS address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the Project that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires, and how the proposed action would increase the occurrence of off-highway vehicle use on the access roads and unauthorized roads. We strongly urge the Proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires and other impacts associated with authorized and unauthorized vehicle use in the desert off of highways. The plan should integrate vegetation management with fire management and fire response.
10.MG-1	Below is the link for the Greenlink West route, and the race routes. I have been in touch with the significant race groups - Legacy, BITD, VORRA, and SNORE. The only OHV concern that needs to be addressed, is the potential for the laydown yard at Coledale. This is the area that is used by Both Legacy and BITD during their races in and near Tonopah, including the Vegas to Reno and Gold Rush events. (see attached photo) NVORA encourages BLM to protect the Public Land use and access needs of Nevadans who participate in these events when assigning or otherwise working with Nevada Energy on the Greenlink West project. If this is the only location for the proposed laydown yard, NVORA strongly suggests to simply change the shape of the yard, and level an area that will accommodate the aforementioned OHV historical use events. This newly created level area NVORA is suggesting would also most likely become the default recreational staging area, which is often seen at Coledale site now. NVORA is willing and able to be an active project facilitator for this new staging area in an effort to meet the needs of all stakeholders: land managers, Nevadans, neighboring communities, NVORA's engaged network of active partners, and all visitors to the State of Nevada. Here is an encompassing link of the Greenlink West project and the historical race routes. https://caltopo.com/m/JJJ9N [Attached Image of Coaldale Material Yard and Race Route]
13.DS-7	So, again, we need to sever that and move it as far -- if it has to happen, let's get as far away as we can do it. It's important to think these things through, because there's three alternative land uses that are going on besides the power line here, and there's a conflict existing between the BLM right now with itself, if it permits these things and interferes with the recreational line, because they funded this and these are just proposals. Ours is real.
13.KE-33	Humming transmission lines create a consistent noise impact. This will impact hikers and other visitors. Noise from construction and helicopters will be a nightmare for visitors and local people. This needs to be analyzed.
13.KE-43	Nevada's beautiful and wild public lands draw recreational seekers and tourism as people view natural vistas, wildlife, climb mountains, and enjoy dark night skies. This economic driver of the state should not be despoiled and cluttered by huge transmission towers and lines, and associated large-scale solar and wind projects. Before such massive transmission and energy sprawl projects are built, the public should be fully engaged. Tourists value the remote deserts of Nevada, the historic open unbuilt landscapes and wildlife. These high values of the Nevada Outback should not be summarily thrown away in a poorly-planned energy build-out that is designed to only benefit utilities, and not the average Nevadan.
13.PG-7	In these areas, the line would create a new linear disturbance resulting in potential for new impacts, such as habitat fragmentation, elevated perches for predator species, invasive and noxious weed propagation, a modified visual landscape, and an altered recreation setting.
17.LC-3	It breaks my heart because it rips through the Nevada outback with, you know, all of this amazing wildlands and nature and recreation. I mean, our -- I agree with all of the other comments. We have mountain biking trails here, horseback riding trails, hiking, OHV trails, and that's our economy. And this is just going to open up the Nevada outback to large-scale solar development. And I'm completely against that.

CID	Recreation Comments/Statements
20.CG-2	And putting right-of-ways in that are limited use, where people can stand to lose year of their freedom for violating --committing a Class A misdemeanor by obstructing a right-of-way is not going to be conducive to the recreational opportunities in this town. The same with Amargosa and this county, especially. And the county seems like it's getting no consultation. This county is big on trails and trying to connect trails throughout Western Nevada for multiple use, be it equestrian, hikers, ATVs, long riders, 4 by 4s. We have some incredible recreational events that happen here that are permitted by BLM, both locally, like Storm-OV's events. We have the Rebel Rally, which was an incredible women's motorsports event that came through last year, and they fell in love with the area. They actually got a permit to run through a national park on their event. Almost unheard of for motorsports.
27.KB-11	Beatty and Oasis Valley: Any route through this area must not veer from existing rights of way and/or transmission lines. The proximity to the town of Beatty and Death Valley National Park is a recipe for major visual and route impacts to tourism and recreation from which both the town and our state derives great benefits.
29.KE-1	This letter comes from the residents of Beatty, Nevada who live in the northern Oasis Valley area of Nye County. It is a request for the Bureau of Land Management (BLM) to reject the new Alternative K for the Greenlink West Transmission Project (see Figure 1. Map below). The new alternative would place large 180-foot transmission towers and high-voltage lines in very close proximity to the residents that live in the area. This alternative would place the transmission towers and line just outside of Springdale and cross the Highway 95 just north of the Bailly Hot Springs. It would be visible from about 20 different properties. The alternative would potentially harm our property values as it would be visually unattractive. The impact to our local view will also degrade our quality of life. The Oasis Valley is a scenic region and has several recreational opportunities including off-roading, Jeep trails, hiking, mountain biking, horseback riding, and bird watching. The opportunities are a benefit to the local economy and they would be degraded by this transmission project.
39.MG-1	Coaldale materials yard 7, Esmeralda Alt Substation E3, Amargosa Valley Substation ALT 1 &2 are all straddling or extremely close to well used historic OHV routes, and in some cases would conflict with historical and current Off Road Race routes. How do we take a proactive action to assist all parties and protect access while making this project successful?
44.PS-2	The path of the Walker River Alternative for the Greenlink West Project would pass directly through priority habitat for the Bi-State Sage Grouse south of Mt. Grant. The proposal to list the Bi-State sage grouse under the Endangered Species Act was recently reinstated by the U.S. Fish and Wildlife Service, making conservation of this species especially important. Transmission lines adversely impact sage grouse populations by increasing predation rates on eggs and chicks from avian predators, like ravens. The negative impacts on sage grouse populations can extend 2.5 – 12.5 km from the transmission line1,2. Because the Walker River Alternative would pass within 1-8 km of several active Bi-State sage grouse breeding locations and have significant negative impacts on recreation in the East Walker River corridor, the Walker Basin Conservancy does not support this alternative.
44.PS-3	Both the “Walker Lake” and “Walker River” proposed routes pose significant visual impacts to public lands with significant recreation use and value. Through the EIS and permitting process, the Conservancy encourages the use of existing transmission corridors and the minimization of visual and recreation impacts.
52.SN-2	Our concerns are in the Esmeralda County portion of the Greenlink West proposal and the associated solar development that would be directly linked to the line. The proposal cuts through a very high value recreation area (refer to the following map). Highway 6, soon to be the Starriest Route in America is the center of the area with numerous areas we have identified as being Lands with Wilderness Characteristics. These stunning volcanic areas have immense potential for outdoor recreation development. That potential would be irrevocably lost with the current proposed alignment of Greenlink West and the associated substations and solar development. Our main request is that the section of the Greenlink corridor and associated solar development be moved to the northeast along the route that was identified in the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (Refer to map in Appendix 1) which states: Rationale: The recommended revisions would collocate with existing infrastructure and provide access to the Millers SEZ, facilitating solar energy development. If any proposed infrastructure (Greenlink West Transmission Line Project route or proposed Interstate 11 Project route) is approved and constructed in the future, the ROW for the new infrastructure would become a preferred route for energy transport, and the BLM and USFS should consider revising the corridor to align with that ROW.
52.SN-3	MINIMIZE IMPACTS TO LANDS WITH WILDERNESS CHARACTERISTICS AND HIGH VALUE RECREATION The BLM’s current lands with wilderness characteristics inventory is out of date, incomplete, and not in compliance with the 2012 BLM Manual 6310 protocols. Between 2012 and 2018 Friends of Nevada Wilderness formally submitted 96 Lands with Wilderness Characteristics (LWCs) inventories to the various Nevada BLM District Offices. This data was resubmitted electronically to the Nevada State Office in early 2022 and is available there for review. Twenty-seven of those LWCs inventoried lie within 20 miles of the proposed Greenlink Transmission Corridor and associated solar developments, and could be directly and/or indirectly impacted by cumulative impacts from the proposal. Effective land use planning for the Greenlink West Transmission Corridor and the connected solar developments rely on current, comprehensive information of all the BLM Resources in Nevada and how they are being used. Unfortunately, the Resource Management Plans for much of the length of this corridor are hopelessly out-of-date. The last Tonopah Field Office RMP was completed in 1997. Recreation planning in this office has been virtually nonexistent over the last two decades. As a result of these old outdated resource management plans, decisions are now being contemplated without adequate land use planning that will have irreversible impacts to a region with tremendous recreation potential.

CID	Recreation Comments/Statements
52.SN-4	These impacts can be easily mitigated by moving the Greenlink corridor to the northeast. In early 2013, Friends of Nevada Wilderness also formally submitted an outline to the BLM Battle Mountain District Office for a high value, natural recreation area of local and regional importance on the public lands centered on what is now the proposed Esmeralda Substation and "Esmeralda SEZ." This area has some of the most stunning, natural scenic areas in Nevada and several potential biological and paleontological ACECs in the Fish Lake Valley area. Additionally, this region is along an important recreational route connecting National Parks, State Parks, National Conservation Areas, and National Monuments. This area has the potential to fulfill a critical link and need for recreation in west-central Nevada. At the heart of this important recreation area are the unique and stunning formations of the Monte Cristo South LWC, known as Monte Cristo's Castle. The BLM has been aware of unique geology, fragility of the formations, and high natural recreational values of the Monte Cristo South area potential since the early 1960s when they first considered formal protections for the area (Robb-Bradick, Tonopah, NV). In 2005, legislation was introduced into the Nevada State Legislature to create Monte Cristo's Castle State Park. The Nevada State Legislature responded in June 2007 by providing for the establishment of the Monte Cristo's Castle State Park, which would be on 5,800 acres of land administered by the BLM. To transfer the land to the State of Nevada for establishment of the State Park, the BLM would conduct an environmental assessment and other work required as part of the Recreation and Public Purpose Lease process. The proposed park included a campground, hiking areas, and interpretive trails with displays about the unique geologic formations in the area. This area can fulfill a critical need for a developed campground to serve as a center of exploration for this outstanding natural region. Unfortunately, with the financial collapse of 2007/2008, the state resources available for the creation of this new State Park vanished. Presently the Monte Cristo South area is considered a premier destination for astrotourism.
52.SN-5	The area offers unparalleled and unencumbered opportunities to experience, explore, and photograph the astronomical wonders from the North Star to the southern horizon in one of the darkest places in America. The proposed Greenlink Transmission line and Esmeralda Substation is proposed to be built on and through this area and the associated solar developments will take a sizable bite out of these unique and fragile lands and surround the remaining natural lands with massive industrial photovoltaic plants. The dark skies this area is known for will be significantly impacted. The recreational, astrotourism, and natural visual resources of this entire area will be forever degraded and will preclude quality recreational development and enjoyment.
57.KD-5	Additionally, Berlin ichthyosaurus park appears to be running very close to where you want to put these lines also, you should really get their input on the impact.
66.KE-1	How much recreational activity would increase on new and approved roads associated with the transmission project?
72.EG-3	All the recreation issues and that exposure has been known to cause leukemia.
77.TA-19	Spill Prevention Control and Countermeasure Plans (SPCCPs) shall be developed for this Action as defined by NV Energy. Indications were given that these plans are directed only toward riparian areas, yet inclusion of all helicopter landing sites and transmission substations must also be included (aviation fuel, substation chemicals, etc.). Additionally, scheduled routine monitoring of defined areas of concern require delineation within a SPCCP. Please include the SPCCPs within the EIS and include appropriate science-based analysis of said plans.
81.CO-10	The NPS strives to provide visitors with quality experiences. Death Valley NP nears two million visitors a year. Tule Springs Fossil Beds NM is located next to a large metropolitan area with more than two million residents and more than 42-43 million visitors per year. Issue: The NPS is concerned the Greenlink West Project will run through one of the main visitor experience areas at Tule Springs Fossil Beds NM. The area, along Durango and Moccasin Roads, is considered a main entrance to the park and includes an interpretive kiosk, trailhead and parking area for visitors. The view beyond the kiosk and parking area is considered the most scenic entrances to the park, displaying a view of the badland features of the Las Vegas Formation that is not easily viewed elsewhere. Recommendation: The NPS recommends the BLM and project proponent work with the park to re-route the alternatives through the park or microsite towers to avoid, minimize, or mitigate impacts to this area.
81.CO-11	Off-Highway Vehicle (OHV) use is a major recreational activity in the West, especially in Nevada. The exponential increase of OHV use in the last decade has increased the conflict between recreation and the protection of resources. Illegal OHV use, particularly dirt-bike riding, is noted as common in the Upper Las Vegas Wash area (BLM Upper Las Vegas Wash Conservation Transfer Area Final Environmental Impact Statement, 2012). Issue: The construction of transmission lines and associated infrastructure would increase human activity within Tule Springs Fossil Beds NM. Vegetation removal in the transmission corridor for construction vehicles has the potential to attract illegal OHV use into the park creating unauthorized user-created roads, damage sensitive paleontological resources, destroy wildlife habitat, as well as introducing new invasive plant infestations to the area. The park has inadequate visitor support infrastructure and infrequent ranger patrols to monitor OHV activity. Recommendation: The NPS recommends the BLM and project proponent work with NPS to re-route the alternatives through the park to avoid, minimize, or mitigate OHV use or trespass and invasive plant infestations in the area. The NPS also recommends the BLM use the best available science to analyze likely increases in OHV damage and cultural and paleontological resource threats with increased construction activity in the area. Any roads or vehicle tracks created for construction should be restored to the maximum extent possible to reduce soil compaction and eliminate the appearance of a road or track. If sections of road or track on adjacent BLM managed lands cannot be restored for reasons of project maintenance, NPS recommends the BLM use appropriate means to close the project road for public use (e.g., berms, gates, signs) so as not to create new access points adjacent to the park that may lead to illegal OHV activities and resource damage in the park.

CID	Access and Road Construction Comments/Statements
01.RAM-4	We have been told that construction of this project in our area will take approximately 3 years to complete. Maintaining the access and connectivity of our recreational routes and the safety of users must be considered and addressed. The Town of Beatty, Beatty Chamber of Commerce , Storm-OV, the Nevada Commission on Tourism , Nevada BLM, and Nevada State Parks have invested significantly in Beatty's eco -tourism economy over the past ten years. It is critical that we retain the ability to attract recreators to our community and that their experience is not denigrated during the construction of this project .
01.RAM-7	The proposed Beatty Material Yard 5 on twenty-fi e acres of land is on a parcel that includes the Beatty General Improvement District Driving Range and the Beatty Cemetery along with HWY 95 frontage. We want to be a part of the final location decision and the content and construction of the material yard. We are opposed to that location because of the safety of the kids at the Beatty High School which is adjacent to the lay down yard proposed. Large trucks will be coming into the laydown yard and it is not a good location for the yard. Other locations south of Beatty on BLM property would be better suited.
01.RAM-9	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to concerns about the impact to the Wash and the archaeological sites and petroglyph panels along it. If existing roads are to be improved and widened, we would like to be involved in their creation and decommission.
01.RAM-13	Natural resources are critical to Beatty residents' quality of life and our economy. Greenlink West will cross land and wetland habitat that is home to a wide variety of flora, fauna, and aquatic species. One of the biggest impacts will be avian. Birds commonly collide with transmission lines and are often electrocuted. Hundreds of species of birds migrate though the Oasis Valley which has been named an important Bird Area by the Audubon Society. Bird watching is also an economic resource for Beatty. Visitors come to Beatty from all over the Nation and Globe specifically to bird watch.
03.AS-3	Additional poles on the monument along Moccasin Road will negatively impact the desert landscape when alternative alignments should be considered, including along existing roadways where cultural and historical resources would not be impacted.
04.BTAB-7	The proposed Beatty Material Yard 5 on twenty-five acres of land is on a parcel that includes the Beatty General Improvement District Driving Range and the Beatty Cemetery along with HWY 95 frontage. We want to be a part of the final location decision and the content and construction of the material yard. We are opposed to that location because of the safety of the kids at the Beatty High School which is adjacent to the lay down yard proposed. Large trucks will be coming into the laydown yard and it is not a good location for the yard. Other locations south of Beatty on BLM property would be better suited.
04.BTAB-9	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to concerns about the impact to the Wash and the archaeological sites and petroglyph panels along it. If existing roads are to be improved and widened, we would like to be involved in their creation and decommission.
04.BTAB-13	Natural resources are critical to Beatty residents' quality of life and our economy. Greenlink West will cross land and wetland habitat that is home to a wide variety of flora, fauna, and aquatic species. One of the biggest impacts will be avian. Birds commonly collide with transmission lines and are often electrocuted. Hundreds of species of birds migrate though the Oasis Valley which has been named an important Bird Area by the Audubon Society. Bird watching is also an economic resource for Beatty. Visitors come to Beatty from all over the Nation and Globe specifically to bird watch.
06.KE-1	North of Beatty and in many other areas, there are roads that are going to be widened to construct the Green Link project. How much will the roads be widened and where do they intend to secure the water for dust mitigation in the Beatty area?
10.ELR-11	The future use of access roads by the public should be analyzed in the EIS. In other parts of the Mojave Desert, the construction of utility access roads has resulted in public use of these now deemed OHV roads and establishment of new unauthorized OHV roads diverting from access roads into previously undisturbed tortoise habitat. The myriad of impacts of human access using vehicles to the tortoise and tortoise habitat are well-documented in the scientific literature and summarized in Tracy et al. (2004) as part of the “threats network” to the tortoise. BLM should ensure that all impacts from creation and use of access roads by the Proponent and other are analyzed as part of the but for analysis, and that appropriate mitigation is implemented to prevent public use of access roads and establishment of new roads.
10.ELR-17	We request that the DEIS address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the Project that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires, and how the proposed action would increase the occurrence of off-highway vehicle use on the access roads and unauthorized roads. We strongly urge the Proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires and other impacts associated with authorized and unauthorized vehicle use in the desert off of highways. The plan should integrate vegetation management with fire management and fire response.
11.AM-18	In the Draft EIS, discuss whether the microwave radio facilities or transmission lines would emit electromagnetic fields and if this could cause impacts to flora or fauna or affect the movements and navigation of species that are sensitive to electric or magnetic fields.
12.ES-5	The footprint of transmission towers is much larger than the footers of the towers. There are roads underneath the towers, vegetation removal around them, and many other cumulative impacts. Cheatgrass and non-native Weedy vegetation will flourish. All of this must be addressed in the environmental document reviewing this project.
13.KE-16	In the application to the BLM, the Project Proponent NV Energy has applied for a 600-foot-wide temporary Right-of-Way (ROW) for construction and a 200-foot-wide permanent ROW for operations and maintenance. These long-lasting and permanent impacts should be thoroughly analyzed, as these linear disturbances could open up new unplanned and unanalyzed routes for off-highway vehicles. At the Beatty, NV May 17 BLM public meeting, it was stated that OHV race groups have approached BLM to use these linear ROWs and the construction and laydown areas for the transmission project as their own staging areas for races. This needs analysis. This would also be a connected action to the proposed action. Please evaluate dust, safety and other environmental impacts associated with a new high-speed race route on the Greenlink West corridor. Would high-speed racers collide with transmission towers?
13.KE-19	Constructing the line will require new roads and extensive cleared areas. This will impact species like burrowing owls, desert tortoise, kit fox, American badger, Western Joshua tree, Las Vegas bear poppy, Las Vegas buckwheat and other rare plants. The EIS should map and detail all sensitive, rare, and threatened and endangered species along the proposed route.

CID	Access and Road Construction Comments/Statements
13.KE-39	NV Energy's One Line experienced design flaws when their V-shaped towers supported by guy-wires experienced collapse due to vibration: apparently more than 30 blew over in a windstorm in Lincoln County. The Public Utilities Commission of Nevada recommended in 2012 that the cost of mitigating wind vibration power pole collapse with new designs not be passed onto ratepayers. (See article below in the Appendix).
14.CH-5	As to the impact to the business activities of HTI and BAH, each organization pe1forms significantly sensitive activities which entail strict security protocols and require precise and uninterrupted test activities. HTI/NATC under the auspices of Permit N-66753 utilizes BLM administered public lands for vehicle and equipment testing. HTI/NA TC conducts year-round development and certification tests for commercial and militaiy vehicles and equipment including without limitation, motorcycles and passenger cars, over the road commercial and vocational trucks, and a broad range of wheeled and tracked militaiy equipment for the Depaitment of Defense (DoD). HTI/NATC and BAH utilize their owned calibrated facilities to continuously evaluate these same systems.HTI/NATC tests vehicles on approximately 235 miles of existing roadways on public land. The road condition and maintenance of these ELM-administered roads is a large part of the approved Land Use Permit terms. HTI/NATC has the sole responsibility to conduct road maintenance on a routine basis on p01iions of the road network. Roadway maintenance includes the repair of road washouts and other damage caused by weather related events, repair of roadway damage resulting from off-highway vehicle (OHV) racing, repair of roadway ruts created from use during wet weather, repair of general roadway wear from use by the public, local ranchers, and HTI/NATC test vehicles. HTI/NATC completes the road maintenance not only for the sake of controlled and repeatable vehicle testing activities, but so the public can enjoy these roadways for recreation purposes, as well.
14.CH-6	Each of these road networks have been continuously measured since the early 1980s and they form the reference conditions by which a broad range of US Marine Corps and US Army equipment is evaluated and accepted. This terrain is referenced in DoD contracts which constitute billions of dollars of equipment acquired to supp01i deployed forces around the world. Utilizing these calibrated test environments, these DoD systems are accurately evaluated by HTI/NATC to determine the ability to operate in conditions found in Eastern Europe, South America, South East Asia, Africa, South West Asia, and other areas where US Defense Forces are deployed. Due to this unique ability, the activities ofHTI/NATC and BAH have been identified as essential by the Depaiiment of Homeland Security, as being considered part of the Defense Industrial Base (DIB) in the Critical Infrastructure Sector. The Essential Critical Infrastructure Workforce for the DIB includes workers who support the essential products and services required to meet national security commitments to the Federal Government and the U.S. Military. These activities required by DoD contracts involve continuous access to these terrains, and therefore coincide to a special responsibility to maintain a normal work schedule. The test and engineering services that HTI/NATC provides are considered unique and have been identified as the only location within the continental United States where the work can be accomplished. Accordingly, HTI/NATC has received numerous multi-year sole source contracts from the Depatiment of Defense and other Government agencies.
20.CG-3	I don't know legally if an SRP, you know, such as Mr. Spicer or myself in the future, once I am allowed to apply for them, can even cross a right-of-way that's being used by a private entity. These aren't public entity right-of-ways. They're not roads. They're not -- they're things that are going to have orange signs on them. Orange signs mean no trespassing if you can see them, just like the pipeline that exists on the north side of the highway. You know, deputies and officers are asked to enforce those regulations, and they're going to be faced with members of their community as this goes forward.
21.JGL-5	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to its impact to the Wash, the archaeological sites and petroglyph panels along it. If existing or new roads are to be improved and widened, they will cause irreputable damage to the desert floor, and would take a hundred years or more for nature to repair itself.
37.MG-3	The Greenlink West's largest areas of concern to the offroad community is the potential impact at the Coaldale laydown yard, (Yard 5) as that straddles the historic route / support area "pit-stop" used in numerous competitive events. In this instance simply including an area of adequate size adjacent to the new yard would be sufficient to accommodate that historical use.
42.NS-6	For the original proposed transmission line, one of the proposed access points for construction is the road leading up to my house and the roads behind my back fence. I am concerned that the construction activities will block access to my house.

CID	Vegetation/Weeds/Wetlands/Riparian Areas Comments/Statements
02.LC-2	This transmission line is based in natural gas. Greenlink is a euphemism. It's just going to power all -- it's not going to help climate change at all. It's going to power all of these big Silicon Valley high-tech Reno/Sparks factories. And then it will open up the heart of beautiful outback Nevada -- full of longhorn, wildflowers, desert tortoise, Joshua trees -- to solar energy development. And it's -- it's crushing me. I mean, I'm probably going to move out of Nevada.
02.SP-5	If there is an accident, that would create a potential wildfire danger that could be a risk for the residents living in the area.
03.KE-5	The transmission line would cross Highway 95 and even springs, meadows, native alkaline grasslands, and potentially riparian woodlands. If there is an accident, that would create a potential wildfire danger that could be a risk for the residents living in the area.
04.HG-5	North of Mason Valley it follows the railroad track into Adrian Valley, a tributary to Carson River with beautiful standing cottonwood, far from the noise and lights of Highway 95, a special place, indeed.
05.CD-4	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will imnpact avian wildlife and visual resources.
05.SS-1	I'm representing a group called Mojave Green. And right now we are building a camp outside the Yellow Pine Solar facility in the south Pahrump Valley. And what you see here pictured in this photograph is the 3,000-acre site of Yellow Pine Solar before it was bulldozed. So this site -- and you can see all of the greenery. People think of the desert as being empty, but they're anything but empty. On this site alone, [inaudible] is bulldozing 92,000 Mojave yuccas that are hundreds, if not thousands of years old. They are bulldozing close to a million or more -- probably more -- creosotes, which are actually the oldest living things on earth. The creosote root systems can be as old as 11,000 years. And what I have seen in this valley is truly a form of ecocide. I believe it's a form of terror, and I believe it's absolutely unnecessary.
09.LO-1	I'm not going to say anything that you haven't already heard. And I'm certainly not a scientist or an expert. I'm a tree planter. I'm from Nevada, and I'm a Mojave desert lover. I'm not sure which group I'm most worried about: Losee, Tule Springs Fossil Bed, Beatty, Scotty's Junction, Walker River, Carson River. And it's not just the line. It's everything that's associated with it. They divided [inaudible], and that's not all. That's just one. Where will the antelope migrate? Where -- where will the Joshua migrate? If we can even, in one lifetime, thinkof Joshua trees migrating and creosote migrating. It's already migrating north three deserts. Where will it go?
10.ELR-13	The invasive species management plan covers more than noxious plant species. BLM is mandated by Executive Order 13112, Invasive Species, section 2(a)(2) and 2(a)(3) to "detect and respond rapidly to and control populations of such [invasive] species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded;" and "that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions." BLM policy (BLM 2008a) that states "multiple use and sustained Desert Tortoise Council/Comments/Greenlink West Project.6-1-2022 6 yield principles are best served by healthy and productive land, of which vegetation is a key component. By focusing programs on maintaining and restoring native plant communities on public land, BLM can be more successful at fulfilling a vital part of the agency and DOI mission."
11.AM-6	Wetlands and riparian areas increase landscape and species diversity, support many species of western wildlife, and are critical to the protection of water quality and designated beneficial water uses. In order to illustrate project impacts to wetlands in the area, if identified, we recommend that the Draft EIS specifically include the following analyses or descriptions: • Describe impacts under individual or nationwide Clean Water Act Section 404 permits authorizing the discharge of fill or dredge materials to waters of the U.S. (See below.) • Include maps identifying wetlands and regional water features. • Identify the direct, secondary, and cumulative impacts to wetlands in the geographic scope, including impacts from changes in hydrology even if these wetlands are spatially removed from the project footprint. Include the aggregate impacts to wetlands from future development scenarios based on population and growth estimates. • For wetlands potentially impacted by project alternatives, include wetland delineations and functional analysis. • Identify Best Management Practices and other measures to be taken to ensure contractors do not allow removed trees and vegetation to fall into drainages or riparian zones. • Identify design elements that avoid aquatic resources impacts where possible and mitigation measures that minimize unavoidable impacts.
11.AM-8	Construction of the Greenlink West Project infrastructure could cause significant surface disturbance. Even temporary disturbances have the potential to create long-term environmental impacts, including soil erosion, invasive plant species growth and habitat loss. The EPA encourages BLM and NV Energy to work cooperatively to ensure that the amount of surface disturbance is minimized to the extent practicable. We recommend that the Draft EIS discuss soil characteristics, including slope gradient, hydrologic soil group and erosion hazard within each alternative alignment analyzed in the EIS.
11.AM-17	In the Draft EIS, include measures that are consistent with Executive Order 13112 on Invasive Species. We suggest including any existing BLM direction for noxious weed management, a description of current conditions, and best management practices, which would be utilized to prevent, detect, and control invasives in the project area. Discuss measures that would be implemented to reduce the likelihood of introduction and spread of invasive species within the proposed project area. We encourage the BLM to promote integrated weed management with prioritization of management techniques that focus on non-chemical treatments first, and mitigation to avoid herbicide transport to surface or ground waters. Early recognition and control of new infestations is critical to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries.
12.ES-5	The footprint of transmission towers is much larger than the footers of the towers. There are roads underneath the towers, vegetation removal around them, and many other cumulative impacts. Cheatgrass and non-native Weedy vegetation will flourish.. All of this must be addressed in the environmental document reviewing this project.
13.KE-18	Biological Resources Lakes, wetlands, rare plant communities, Joshua tree habitats, Mojave desert tortoise, sage-grouse, and many other high-value natural resources will be significantly impacted by this transmission line proposal and connected utility-scale energy-sprawl projects.
13.KE-22	The line will cross over wetlands along the Amargosa River near Beatty, NV, and could impact waterbirds, the Amargosa toad, Oasis Valley speckled dace, two species of rare and endemic spring snails, neotropical migratory bird migration corridors, and breeding bird faunas. These resources should be described in detail and impacts described.
13.KE-28	Construction will bring in a rush of invasive weeds which will compete with native plants. NV Energy may use herbicides to control weeds and herbicides will kill native species. This should be analyzed. We observed many invasive, non-native plant species along the project proposed routes, including red brome (Bromus madritensis var. rubens), cheatgrass (Bromus tectorum), Mediterranean grass (Schismus barbatus), African mustard (Malcomia africana), Indian hedgemustard (Sisymbrium orientale), saltlover (Halogeton glomeratus), Russian thistle (Salsola tragus), and redstem stork's bill (Erodium cicutarium). We found red brome and Schismus to be present in our field trips, and all these species could increase with soil disturbance during construction activities. We are concerned that herbicides will be used to control these exotic invasive plant outbreaks under the solar field, which could do significant damage to native grasses, forbs, and other native plants present. This should be analyzed.
13.PG-7	In these areas, the line would create a new linear disturbance resulting in potential for new impacts, such as habitat fragmentation, elevated perches for predator species, invasive and noxious weed propagation, a modified visual landscape, and an altered recreation setting.

CID	Vegetation/Weeds/Wetlands/Riparian Areas Comments/Statements
16.JB-1	Please reject the application for the Greenlink West Transmission Project. I write to you as a resident and protector of the southwest desert. I strongly encourage all government officials, all residents, all visitors and all who do business in the southwest avidly protect all southwest lands now and forever. Including all southwest animals and plants for all to thrive. Because of this deep commitment, I respectfully encourage you to reject the application for the Greenlink West Transmission Project. It threatens to harm wilderness, plants, animals, landscapes, views, historic and archeological sites, and even local businesses.
16.JB-4	The GWTP would threaten needed habitat and ecosystems for animals and Joshua Trees. The GWTP is proposed to be built through sensitive areas in the Mojave and Great Basin Deserts that is home for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees. This is wrong. It should be stopped.
16.JB-6	GWTP's line will damage wetlands along the Amargosa River near Beatty, NV. This will harm birds, plants and other animals needing those wetlands. The line would disturb a pronghorn fawning ground in Sarcobatus Flat, harming those deer, which cannot be replaced.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
19.JB-8	The additional destruction of the natural environment, including incalculable harm to rare flora and fauna, including Joshua trees, desert tortoise, sage grouse, desert bighorn and pronghorn antelope cannot be mitigated in any manner. Studies show that solar projects in Wyoming are already negatively impacting migration routes for the pronghorn antelope.
21.jGL-3	Greenlink West has generated great interest from the solar energy industry resulting in large utility scale facility applications to the Nevada Public Utilities Commission and requests to the BLM for withdrawal of tens of thousands of acres of public land in the Amargosa, and Beatty areas. The BLM should conduct a study on the long-term impacts this would have to the local economy and the local flora and fauna.
24.KB-8	The Amargosa River has had too many intrusions and manipulations, already, for the convenience of surrounding mining and irrigation projects. Walker Lake is usually overdrawn, trying to keep its shoreline from falling, and doesn't need towers and transmission lines proliferating along the edge to emphasize a downgraded "Visual Resource Management Classification". The view changes, and possibilities for bird flyways through transmission lines would rate negative. Together, decades of Amargosa and Walker water, wildlife and plantlife recovery projects' databases might lose continuity, (slow to build and read) - because of permanent interruption by tower, lines and substation construction and maintenance work.
27.KB-5	2) These actions need be taken to impart key information on maps of the draft proposal: a.) Visually indicate each route segment, sub-station, distribution lines, communications sites, access roads, projected energy or minerals projects along the line, that would fragment previously undisturbed parcels of public land. b.) Utilize data/maps from NDOW to indicate by overlay which areas are key wildlife habitat, which are of mid-range importance. Also current migration corridors, not only of mammals, but of migratory bird flyways. c.) Ditto for areas of highest cultural and historical importance. d.) All springs and riparian areas must be clearly specified on the maps.
33.LM-3	Please do the right thing and reject the so-called Greenlink West Project. It would benefit the increasingly-rich few, not the people who own the land, us. And it would do it in a way that would destroy precious land and habitat, land that would be gone forever.
35.MC-2	[I am writing to ask that BLM please reject the application for the Greenlink West Transmission Project (DOI-BLM-NV-0000-2022-0004-EIS) for the following reasons:] 2. The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
35.MC-4	[I am writing to ask that BLM please reject the application for the Greenlink West Transmission Project (DOI-BLM-NV-0000-2022-0004-EIS) for the following reasons:]4. The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV, which will imnpact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
35.MC-12	[I am writing to ask that BLM please reject the application for the Greenlink West Transmission Project (DOI-BLM-NV-0000-2022-0004-EIS) for the following reasons:]12. A number of 25-acre maintenance yards are expected to be cleared near Cactus Springs, Beatty, Goldfield and other areas, negatively affecting plant and animal habitat.
42.NS-7	I am concerned about the potential for fire during the construction and operating phase of the transmission line. Everything is dry now due to drought conditions. The Plan of Development indicated that protocols would be followed to eliminate fire risks (such as no smoking except in designated areas, staying out of areas where noxious weeds are growing, having fire extinguishers available). If the transmission line is going over a large patch of existing noxious weeds, removing these weeds to prevent future fire hazards should be evaluated. Once the transmission line is in place, the line needs to be inspected regularly for invasive weeds; these weeds tend to grow after the ground has been disturbed.
47.RR-5	The line will be built through sensitive ecosystems in the Mojave Desert through habitat for desert tortoise, bighorn sheep, and Joshua trees.
47.RR-6	The line will cross over wetlands along the Amargosa River near Beatty, NV. The line will disrupt breeding habitat for pronghorn and will affect other species living on or near the river.
53.WB-6	The line is proposed to cross over wetlands along the Amargosa River near Beatty, NV. This will impact avian wildlife and visual resources. The line would be built across a pronghorn fawning ground in Sarcobatus Flat.
60.JM-3	Will the EIS describe management actions for avoiding, reducing and mitigating the spread of invasive grasses around the towers and maintenance roads?
70.RS-10	The line is proposed to be built through sensitive ecosystems in the Mojave and Great Basin Deserts on habitat for desert tortoise, Bi-State sage grouse, pronghorn antelope, bighorn sheep, and Joshua trees.
74.PG-6	Oasis Valley (Beatty) Area - We appreciate the BLM's efforts thus far to explore a range of alternatives in the Beatty area. We recognize this area is heavily constrained with the Department of Defense land to the east and National Park Service land to the west. The Oasis Valley, north of Beatty, is the headwaters for the Amargosa River system. Avoiding further disturbance in the Amargosa River ecosystem is critical for protecting endemic species of wildlife and the wetlands that serve as stopping points for migrating wildlife. We are concerned about the potential for this project to fragment intact habitat behind the Bare Mountains and compromise the efforts of TNC and others to preserve and restore the area's ecological integrity and endemic species habitat.
74.PG-12	Based on our knowledge of the area, priority habitats that should remain intact include wetlands associated with the Amargosa River and desert tortoise habitat. Proposed alternative alignments that cross the Amargosa River may negatively impact wetlands and wildlife associated with the river (e.g., Amargosa toad) and may also impact known desert tortoise habitat in the Oasis Valley. Alignments at higher elevations (>4,200 feet) will likely avoid most desert tortoise habitat and would reduce disturbance in wetlands and impacts on wildlife reliant on the wetlands.
77.TA-15	Native flora and biome are of extreme importance to in Nevada's unique biome regions and requires documentation. Therefore, Action reclamation activities require restoration of native plant species, and any Action reclamation requires planning that identifies and understands imperative threats to native plants and biome from climate change and proposed actions. Please include appropriate science-based analysis.
77.TA-18	Climate change and impacts to surface/ground water, wetlands, and washes and all other water loss impacts to neighboring populations and wildlife, especially during times of significant drought, demand evaluation of impacts from proposed Action to all wildlife/reptiles/raptors/pygmy rabbits, rangeland health, sagebrush habitat, and wild horses and burros reflected in the forthcoming EIS. Please include appropriate science-based analysis.

CID	Vegetation/Weeds/Wetlands/Riparian Areas Comments/Statements
81.CO-7	Tule Springs Fossil Beds NM is host to a number of endemic plant species, including three special status plant species: Las Vegas buckwheat (Eriogonum corymbosum var. nilesii), Las Vegas bearpoppy (Arctomecon californica) and Merriam's bearpoppy (Arctomecon merriami). In addition, all native cacti and yucca, such as Joshua tree, are protected by the State of Nevada. Issue: The Greenlink West Project may impact these special status species. Indirect impacts may include, but are not limited to, habitat loss and fragmentation, trampling of native plants, soil compaction of sensitive desert soils, and the introduction of noxious weed seed through construction equipment, that would result in the decline of sensitive plant populations. Previous analyses indicate a moderate potential of the Las Vegas bearpoppy and Merriam's bearpoppy occurring within the proposed transmission corridor. Downed transmission lines can also cause fires that would decimate these populations. Recommendation: The NPS recommends a detailed inventory and survey of all sensitive plant species within and in the vicinity of the proposed ROW within Tule Springs Fossil Beds NM, and an analysis of the impacts of the Greenlink West Project on species populations in the park. We also recommend that the project proponent complete an inventory and survey of nonnative and invasive plants that have a high probability of establishment once soils are disturbed within and in the vicinity of the ROW on park lands. Frequent and diligent site control and monitoring would be required to limit disturbance areas to a minimum. The park can provide guidance on the survey methodology.

CID	National Historic Trails Comments/Statements
05.JW-1	One of OCTA's Goals is to preserve and protect the overland emigrant trails. This project will have both direct and indirect effects to the California National Historic Trail, Carson Route, Desert and River branches and the Walker River-Sonora National Historic Trail. I'd like to offer some comments regarding this project as it works through the permitting process.
05.JW-3	Looking at our past emigrant trails mapping efforts, all three transmission lines will cross the Walker River-Sonora National Historic Trail in what appears to be Section 2, T15N R24E. The Mira Loma Line may cross in Section 11 or 12, T15N R24E. Line 1 [Fort Churchill-Comstock Meadows]crosses the California National Historic Trail, Carson Route (River Branch) in Section 31, T17N R24E; and (Desert Branch) along the west Range line, Section 3, T18N R24E. At this location there are pristine Class 1 trail ruts.
05.JW-4	Line 2 [Fort Churchill-Comstock Meadows] will cross the River Branch in Section 4, T16N R23E run parallel to the River Branch before turning north crossing the Desert Branch in Section 23, T17N R22E. The [Fort Churchill-Mira Loma] line crosses the River Branch in the vicinity of Section 5, T16N R23E and Section 32 T17 N R23E; continues parallel to the River Branch until turning north crossing the Desert Branch in Section 23, T17N R22E.
05.JW-5	As this project progress OCTA will do field inspections to verify our mapping data and provide comments on direct and indirect effects. Again, Thanks for the opportunity to comment.
25.JW-2	And our interest is telling the story and saving the trails of the western migration in the mid-1800s. This line crosses two national historic trails. The Carson route and the Walker Sonora route. The Carson route follows -- part of it, the desert portion of it, follows around Highway 50. And the river portion of it kind of parallels the Carson River. The line crosses some very pristine segments of that trail. And we are certainly concerned about mitigating and trying to keep those particular trail segments available for generations to come. I've provided you folks coordinates where we think those lines are. We've georeferenced the lines based upon Google Earth information that you have provided to us. It also crosses the Walker Sonora. The Walker Sonora line takes -- goes south from the Fort Churchill area, and it crosses -- all three lines cross on the Walker Sonora. And so we are, again, concerned with this type of information. We'll be providing additional information to you as we go on. We thank you for -- I'm going to talk to Tim, I guess, in greater detail about some of this. We have -- we're not necessarily opposed, we understand the energy needs. We understand we're moving toward -- more towards -- we're getting away from fossil fuels and so forth. This is not the only one. If you look at the State of Nevada, it looks like a capital H with all of the projects. The north line going in the eastern part of Nevada, this one on the west, and then you -- we got another whole mess going across -- following Highway 50, with the Pony Express and the Central Overland Trail.
26.JW-2	Is the Google Earth map that was provided accurate, if you zoom in and look at the coordinates is that specifically where the recommendations for where the line will be? My concern is that it is clearly impacting the Carson Route of the California National Historic Trail, Pony Express Trail, Central Overland Trail, and there is some real concern there. It parallels the Carson River route as well. If the Google Earth coordinates are accurate, it gives us a better chance to go in and identify on the ground where the line is going to be.

CID	Special Management Areas Comments/Statements
04.HG-4	The transmission line would then run up the eastern side of the farming communities in Mason Valley and north of Mason Valley Wildlife Management area, another important area for birds.
06.JM-6	With respect to Tule Springs Fossil Beds National Monument, TNC supports an alternative that would avoid constructing additional infrastructure through or in the Tule Springs Fossil Beds National Monument.
11.AM-3	The U.S. Environmental Protection Agency recommends that the Bureau of Land Management evaluate all reasonable alternatives that fulfill the project's purpose and need. Reasonable alternatives could include, but are not necessarily limited to, alternative routes for transmission and distribution lines, as well as alternative locations for substations and other types of transmission infrastructure. We support efforts to identify and select alternatives that avoid, minimize, and/or otherwise mitigate environmental impacts. In the alternatives analysis, describe the approach used to identify environmentally sensitive areas and the process used to designate them in terms of sensitivity. Wherever possible, we recommend that BLM utilize existing transportation or transmission corridors in lieu of undisturbed land. We recommend the Draft EIS present the environmental impacts of the proposed action and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public (40 CFR 1502.14 (b)). Describe how each alternative was developed, how it addresses project objectives, and how it would be implemented. Quantify the potential environmental impacts of each alternative to the greatest extent (e.g., acres of habitat impacted; change in water quality) and clearly delineate differences in impacts as well as associated benefits between alternatives analyzed. Further, discuss reasons for eliminating alternatives to the proposed action (40 CFR 1502.14 (a)). <u>Tule Springs Fossil Beds National Monument Alternative</u> The EPA encourages the BLM to work directly with the National Park Service to identify an alternative alignment that avoids direct impacts to Tule Springs Fossil Beds National Monument (TUSK). We understand that there is an existing transmission corridor – Renewable Energy Transmission Corridor (RETC) – along Moccasin Drive adjacent to TUSK that, if used, would eliminate the need to build structures and disturb ground within TUSK. Discuss the feasibility of utilizing the RETC (corridor sharing) in the Draft EIS, thereby avoiding direct impacts to TUSK. <u>Mason Valley Wildlife Management Area Alternative</u> We encourage the BLM to continue to work with the Nevada Department of Wildlife to identify an alternative that minimizes impacts to the Mason Valley Wildlife Management Area. In the Draft EIS, fully consider and discuss the options that NDOW has presented, as well as their feasibility.
13.KE-11	Solar exclusion zones should be evaluated for the viewshed of the Tule Springs Fossil Beds National Monument, the Desert National Wildlife Refuge, the region north of Cactus Springs, Southern Amargosa Valley, areas next to Death Valley National Park, Sarcobatus Flat, Esmeralda Substation for connectivity, the Ft Churchill area, and Mason Valley. Just about all these areas have certain criteria that qualify to be established as a Solar Exclusion Zone. Most have regions that contain Lands with Wilderness characteristics. Sarcobatus Flat and the Esmeralda area have big game migratory corridors for pronghorn. Both the Sarcobatus area and the Esmeralda region have traditional cultural properties and Native American sacred sites. The 32 specific exclusion categories are listed and described in the Solar PEIS Record of Decision (ROD), Table A-2. All future utility-scale solar energy development must be in conformance (43 CFR 1601.0-5(b)) with the exclusions adopted through the Solar PEIS ROD and the associated land use plan amendments. Three large-scale solar applications were recently designated as "Low Priority Projects" by the BLM Battle Mountain District under 43 CFR § 2804. (c) Low-priority applications may not be feasible to authorize. These applications may include lands that meet the following criteria: (1) Lands near or adjacent to lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which may be adversely affected by development; 43 CFR § 2804.35 - How will the BLM prioritize my solar or wind energy application? | CFR | US Law | LII / Legal Information Institute (cornell.edu) (See BLM 2022a, b, and c.).
13.KE-30	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11). *The primary legislation pertaining to fossils from NPS and other federal lands is the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11) which was enacted on March 30, 2009 within the Omnibus Public Land Management Act of 2009. PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to manage and protect paleontological resources on Federal land using scientific principles and expertise. The Secretary shall develop appropriate plans for inventory, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies. These plans shall emphasize interagency coordination and collaborative efforts where possible with non-Federal partners, the scientific community, and the general public.* National Park Service Mission Statement: "*The National Park Service is dedicated to conserving unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."* [http://nps.gov/aboutus/index.htm] Constructing a large industrial-scale transmission line through any part of Tule Springs Fossil Beds National Monument would be inconsistent with the mission on the National Park Service. Potential impacts on paleontological resources resulting from construction of the proposed Project primarily would involve terrain modification and road building. Paleontological resources may be significantly impacted, including an undetermined number of fossil remains and unrecorded fossil sites; associated specimen data and corresponding geologic and geographic site data. Direct impacts could result from vegetation clearing, grading, widening of road cuts, and any other earth-moving activity that disturb or bury previously undisturbed fossiliferous sediments, making those sediments and their paleontological resources unavailable for future scientific investigation. The Pleistocene fossil beds here are a very significant resource and some of the richest Ice Age faunas in the Southwest. There is no way to mitigate the destruction of these rare fossils, and save the associated information associated with them: placement, sediments, microfossils, and other geological and taphonomic data that need to be preserved intact for their high value. Punching deep holes to lay foundations for giant transmission towers would results in destruction of significant and irreplaceable paleontological resources.
13.KE-38	A microwave tower is proposed on maps to be near to a Wilderness Study Area in the remote Gold Point Mountains. This needs to be analyzed as new roads built into the roadless area could ruin any future Wilderness designation.

CID	Special Management Areas Comments/Statements
16.JB-5	GWTP's transmission line would harm vistas in several Nevada BLM districts. Irreversible damages to vistas would occur in the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. These negative visual impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands. Public land should not be destroyed this way.
24.KB-7	The Tule Springs Fossil Beds provide "refugia" (Last Stand) habitat for wildlife, and keep wetlands and groundwater systems functioning. They contain archeological and paleontological sites, protected for decades, by Tribal authorities and individual researchers, waiting for future less-destructive, more effective technology, with which to access and read the fossil record, and study past seasons in a rechargeable environment. Not a place to send in heavy equipment, to build (increasingly unnecessary) utility scale industrial infrastructure.
26.PG-3	So in addition to those concerns that were noted related to habitat fragmentation and wildlife displacement and some of the considerations that we've shared for Tule Springs and the Tonopah areas, we want to mention that in the Mason Valley area, where the northern terminus of the line is, that the proposed project doesn't impact the Mason Valley Wildlife Management area that's there.
27.KB-8	There is a significant indirect impact to the historic heritage and world-wide notoriety of Nevada as the Last of the Wild West, not a small element of our tourist attraction. Our state character is ever more vulnerable to the domestication rendered by highly visible new technology power lines and attendant developments on the land. Such change of character is not reversible. This is not a small cost. The solitude, remote and wild character of any of our designated Wilderness and/or wilderness quality lands will be diminished if such lines and/or attendant development can be seen from any locale within them. Granted there already is a Wilderness area near each of our major population areas of Las Vegas and Reno/Sparks, but loss of certain qualities was to be expected. People going further afield currently expect and enjoy full Wilderness qualities. Altering that experience is a loss that cannot be reversible. This is not a small cost.
27.KB-10	Proposed route specific concerns: 1) Mason Valley & Terminus at Ft. Churchill: a.) Should entirely avoid the Mason Valley Wildlife Management Area b.) Keep open a terminus location alternative that could facilitate a potential HWY 80 alternative to HWY 50 Greenlink North proposal. c.) Should entirely avoid any proximity to or visual impact to the Walker River State Recreation Area.
27.KB-13	No portion of the proposed route should go through the Tule Springs Fossil Beds National Monument
27.PS-1	Our mission at the Walker Basin Conservancy is to protect and maintain Walker Lake while maintaining the agricultural, environmental, and recreational interests of the basin. We are responsible for implementing the Walker Basin Restoration Program, a federally authorized program through the Bureau of Reclamation and National Fish and Wildlife Foundation. Through that program, we have transferred more than 14,000 acres to the State of Nevada. Including more than 2500 acres at the Mason Valley Wildlife Management Area, and more than 10,000 acres along the East Walker Corridor. Cumulatively, those will open a total of 29 miles of the Walker River Corridor to public access when all of those parks are complete. Again, I appreciate the chance to enter public comments and to craft renewable energy policy in a way that balances environmental and recreation needs with our need to de-carbonize our economy. So, as we move forward through this process, I urge the BLM to recognize the federal investment that has gone into the Mason Valley Wildlife Management Area, as well as the East Walker Corridor. And echo the comments of The Nature Conservancy in terms of prioritizing existing transmission corridors and infrastructure.
32.KK-3	The proposed Greenlinks west project would have huge impacts from its 469 miles of new transmission lines and substations. The list of impacts would include: Tule Springs Fossil Beds National Monument impacts on ice age fossils, wildlife and Native American cultural sites Mojave and Great Basin habitat for desert tortoise, Bi-state Sage grouse [ravens use raised structures to perch and prey on tortoise and grouse], pronghorn antelope, desert bighorn and Joshua trees visual impacts on places I and many others like to visit because of their scenic beauty -- DNWR, Mount Charleston and the Spring Mountains, and Walker Lake. The BLM would need to downgrade the Visual Resource Management Class of large parts of the Great Basin and Mojave Deserts. any new industrial scale solar plants on public land would have significant negative effects on water, air quality and scenic value.
35.MC-1	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11).
35.MC-3	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range,Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
45.RF-1	1) NV Energy already has a 400 ft corridor for lines; 2) current lines can be boosted to provide more energy; 3) new/additional lines could be installed on current poles; 4) build additional lines outside the Tule Springs Fossil Beds NM
47.RR-1	These are my comments on the proposed Greenlink West Project. I believe there are alternatives that are less environmentally and paleontologically damaging. I DO NOT support the construction of this line just to supply big businesses and California with dirty fossil fuel-generated power when there are other viable alternatives. NV Energy was given a "400 foot renewable energy corridor" in the 2014 legislation that created the Tule Springs Fossil Beds National Monument. They now say it is not big enough. The current lines running across Moccasin can be boosted to provide more power. NV Energy and BLM are not even considering this alternative.
47.RR-2	There is a 3-5 year NEPA process for the National Park Service to consider a permit request for NV Energy to put lines on the Monument. The damage to paleontological resources in the Monument is not just the pole itself but the base of the pole which is placed more than 20 feet deep and spreads out horizontally almost 50 feet underneath the surface. The damage to fossil sites would be irreparable.
47.RR-4	The line will be built inside the border of the Tule Springs Fossil Beds National Monument and will impact Ice Age fossils and visual resources.

CID	Special Management Areas Comments/Statements
49.RS-2	There are some mitigation measures, such as promptly removing road kills, litter, and garbage, trying to raven-proof structures, and using drones to oil eggs in raven nests. While these measures - if properly and consistently implemented - may reduce tortoise mortality, they won't stop some from occurring. Relocating tortoises in harm's way may save some but not all of the tortoises that may otherwise be killed. Where some tortoise mortality or habitat loss occurs, there should be full compensation to advance tangible tortoise conservation in other locations. For example, when a huge new natural gas pipeline was constructed through key sage grouse habitat, some mitigation compensation funds were used to do voluntary buyouts of BLM livestock grazing permits in sage grouse areas. This same mitigation could help tortoises, as BLM unfortunately still allows harmful commercial livestock grazing in some tortoise habitats. Mitigation funds could also be used to plant native vegetation in areas where one or more cheatgrass fires occurred in tortoise habitats. Some of these types of projects have already been successful, often when pre-emergent herbicides are used to knock down germinating cheatgrass and then native seeds and/or plants are put in. Of course, livestock grazing should not occur in these treatment areas because it would decrease the native forage and increase ground disturbance and cheatgrass proliferation.
52.SN-3	The BLM's current lands with wilderness characteristics inventory is out of date, incomplete, and not in compliance with the 2012 BLM Manual 6310 protocols. Between 2012 and 2018 Friends of Nevada Wilderness formally submitted 96 Lands with Wilderness Characteristics (LWCs) inventories to the various Nevada BLM District Offices. This data was resubmitted electronically to the Nevada State Office in early 2022 and is available there for review. Twenty-seven of those LWCs inventoried lie within 20 miles of the proposed Greenlink Transmission Corridor and associated solar developments, and could be directly and/or indirectly impacted by cumulative impacts from the proposal. Effective land use planning for the Greenlink West Transmission Corridor and the connected solar developments rely on current, comprehensive information of all the BLM Resources in Nevada and how they are being used. Unfortunately, the Resource Management Plans for much of the length of this corridor are hopelessly out-of-date. The last Tonopah Field Office RMP was completed in 1997. Recreation planning in this office has been virtually nonexistent over the last two decades. As a result of these old outdated resource management plans, decisions are now being contemplated without adequate land use planning that will have irreversible impacts to a region with tremendous recreation potential.
53.WB-11	Additionally, the Greenlink transmission line would be built next to the Mason Valley National Wildlife Refuge and along the Walker River endangering avian fauna and visual resources. This is one of the most beautiful and visually unimpacted areas in all of Nevada.
53.WB-3	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11).
53.WB-5	The transmission line would create visual impacts in several Nevada BLM districts. Irreversible visual impacts could be inflicted upon the North Las Vegas Valley, the Desert National Wildlife Refuge, Spring Mountains Recreation Area, the Specter Range, Amargosa Valley, Oasis Valley, Sarcobatus Flat, Lida Valley, Big Smokey Valley, Gold Mountain, the Mina area, Walker Lake, Wassuk Range, Ft, Churchill, and Mason Valley. The impacts are expected to be big enough for BLM to downgrade Visual Resource Management Class designations to allow for industrial development in scenic areas of public lands.
53.WB-9	Large microwave towers are proposed to be built along the length of the line. These towers will create both visual and avian impacts. One could be built near Gold Mountain which is a Wilderness Study Area. One would be placed next to the Long Street Casino in Amargosa Valley. The owners were not consulted. Others would be placed on Montezuma Peak, the Spotted Range and Pilot Peak.
75.UNK-4	Lands with protective legal designations should be respected. Thanks for your consideration.
76.UNK-1	The path through the national monument is unacceptable. We can no longer allow renewable energy to decimate our landscape via lithium and other metals mining and 500 foot tall transmission lines.
81.CO-3	The enabling legislation for Tule Springs Fossil Beds NM states under Section 4, Renewable Energy Transmission Facilities: *On receipt of a complete application from a qualified electric utility, the Secretary, in accordance with applicable laws (including the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and title V of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1761 et seq.)), shall issue to the qualified electric utility a 400-foot-wide right-of-way for the construction and maintenance of high-voltage transmission facilities depicted on the map entitled ''North Las Vegas Valley Overview'' and dated November 5, 2013, as ''Renewable Energy Transmission Corridor'' if the high-voltage transmission facilities do not conflict with other previously authorized rights-of- way within the corridor. (Pub. L. 113-291, 128 Stat. 3791 (2014))* Issue: NPS must receive and review right-of-way (ROW) permit applications for infrastructure proposed within the boundaries of an NPS unit, or the NPS' responsibility to determine whether to issue a ROW permit within a park unit in accord with applicable laws and regulations. The NPS also determines the terms and conditions of a ROW permit to meet NPS statutory, regulatory, and policy requirements. Recommendation: The NPS recommends and offers to work with BLM to ensure the NEPA analysis is sufficient for the requirements of both agencies.
81.CO-4	Utilities that pass over, under, or through NPS-managed land must be authorized under an NPS issued ROW permit (54 USC 100902, 36 CFR Part 14). NPS ROW permits allow utilities to operate and maintain infrastructure over, on, or under NPS lands; they set the terms and conditions for such operation and maintenance. NPS Director's Order 53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the used of NPS lands." The NPS has recommended to the project proponent and its contractors, and to the BLM and its contractors, that a third-party engineering consultant evaluate the project proposal to identify any micrositing or route alternatives that would minimize impacts to NPS lands and resources. Issue: The NPS understands there are several routing alternatives through Tule Springs Fossil Beds NM, as stated in previous Cooperating Agency meetings and in the most recent Plan of Development (POD). The POD does not include an NPS ROW permit in the project proponent's requirements for any routing alternatives. The project proponent is required to to submit a ROW application to the NPS. The NPS is aware of resource surveys the project proponent is actively conducting to include in a NPS ROW application package. Recommendation: The NPS has previously provided information to the project proponent and BLM staff on the NPS ROW permitting process. The NPS recommends the BLM and project proponent meet with NPS personnel from Tule Springs Fossil Beds NM and the regional office for Interior Regions 8, 9, 10 and 12 to further clarify the NPS ROW application and permitting process. The discussion will include all supporting documents required in an SF-299 ROW permit application; NPS ROW permitting standards including cost recovery, annual rent calculations, permit terms (generally for 10 years' duration); and activities allowed under a ROW permit. As the federal agency with administrative authority over public lands in Tule Springs Fossil Beds NM, the POD must identify the NPS as a potential permitting agency. In addition to resource surveys, the NEPA environmental analysis will need to include site-specific analyses if the proposed routes across Tule Springs Fossil Beds NM are retained as alternatives.

CID	Resource Management Plan/Land Use Comments/Statements
01.KE-6	Why not use these plan amendments to return something to the environment? They just told me it's not a green energy line and then hook up to national (inaudible). It's not going to be a clean line. So I'm going to run out of time -- no, I think I have a little bit more time here. So, yes, you can amend the plan, you can amend the resource plan, and you can.
01.RAM-12	Mining claim conflicts - There are several active mining claims in Beatty and conflicts must be addressed and resolved. Communication and cooperation between the mining companies, the applicant and BLM must take place as part of the process. Beatty must be included in the discussion about any proposed changes to the Greenlink West t ransmission line location as these changes may affect access to the routes and our economy.
01-KE-3	The other thing that you're doing is you're amending a lot of plans. The sage-grouse plan, you amended a plan in 2014, the Southern Nevada Resource Plan for desert tortoise and activity. And with that amendment, you created an area of critical and environmental concern. And you could do that for bi-state sage grouse.
02.AGA-10	FLPMA Section 102(a) mandates that public lands be managed for a variety of multiple uses. FLPMA Section 102(a)(12) establishes mining as a multiple use and directs the public lands be managed as a source of food, fiber, and minerals. The multiple use management directive in FLPMA Section 302(a) states: The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." The 1997 Tonopah RMP designates the lands where AGA's Beatty area mining claims are located as multiple use lands open to location under the U.S. Mining Law. AGA's mining claims constitute a first-in-time "specific use" authorized by the Mining Law that establishes the primary use of these lands. As described above, 30 U.S.C. § 612(b) prohibits other uses of the surface of mining claims by the United States or its permittees and licensees from materially interfering with AGA's rights to use and occupy its mining claims for mining, mineral processing, and ancillary uses reasonably incident to mining. Because the Beatty segment of the Proposed Action is inconsistent with both the Mining Law and FLPMA, BLM cannot include it in its Preferred Action in the Draft EIS. As discussed in Section V, AGA recommends discussing the Beatty segment of the ROW as an Alternative Considered but Eliminated from Detailed Analysis. From a long-range planning perspective, locating the Beatty segment of the ROW off of mining claims would be in the project proponent's best interests. As suggested in Sections II and III, there is significant potential for AGA's and the other claim owners' ongoing mineral exploration in the Beatty district to expand existing mineral deposits and to discover new deposits. Consequently, it is "early days" for the Beatty Mining District, which could become an important gold mining area where mining operations could be developed for the next several decades. Placing the transmission line off of mining claims in the Beatty area would be the best way to eliminate the potential for future conflicts to develop between mining and an existing transmission line. As is evident from IBLA's decision in Nevada Pacific, in the event a future land use conflict develops on lands where a transmission line is located on mining claims, BLM would be compelled to retroactively void that segment of the ROW grant. This would require NVE to pay to relocate that portion of its transmission facilities.
02.AGA-11	As described in the preceding sections, AGA's mining claims and the current Silicon Project EPO are existing land uses that establish a land use conflict with the Proposed Action. The Silicon MPO, which AGA plans to submit in the future to develop an open-pit and mineral processing operation, will further characterize the extent of the land use conflict. BLM's Greenlink Project West Draft EIS will need to analyze the direct, indirect, and cumulative impacts associated with AGA's Silicon Project EPO and MPO and the Proposed Action. As discussed in Section IV, AGA believes BLM cannot include the Beatty segment of the Proposed Acton in its Preferred Alternative because the resulting land use conflict is inconsistent with AGA's rights under the Mining Law as amended by 30 U.S.C. § 612(b) and FLPMA Section 302(a). AGA thus suggests that BLM's Draft EIS evaluate the currently proposed Beatty segment of the Proposed Action as an "Alternative Considered but Eliminated from Detailed Analysis" because it is inconsistent with governing law. Additionally, the definition of mitigation in the Council on Environmental Quality's (CEQ's) regulations implementing NEPA requires BLM to avoid, minimize, or mitigate impacts associated with proposed actions. The new NEPA regulations at 40 CFR §1508.1(s) define "mitigation" as follows: Mitigation means measures that avoid, minimize, or compensate for effects caused by a proposed action or alternatives as described in an environmental document or record of decision and that have a nexus to th ose effects. While NEPA requires consideration of mitigation, it does not mandate the form or adoption of any mitigation. Mitigation includes: (1) Avoiding the impact altogether by not taking a certain action or parts of an action. (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (3) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment. (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. (5) Compensating for the impact by replacing or providing substitute resources or environments. AGA believes selecting the Modified Alternative C would be an effective way to avoid the land use impacts that would result in the Beatty area if BLM were to select the Proposed Action as its Preferred Alternative. Selecting the current alignment for the Beatty segment of the Proposed Alternative would require BLM to mitigate, rectify, and reduce the impact and NVE to compensate AGA for the impact.
02.AGA-13	Criterion 1: The BLM will use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences. AGA's Comments: • AGA supports this approach. • The BLM must consider impacts to mineral resources that would result from the Proposed Action and the potential loss of the socioeconomic benefits deriving from the development of the Silicon deposit and other mineral resources in the Beatty area including but not limited to long-term employment, increased state and local tax revenues, and opportunities for economic diversification.
02.AGA-14	Criterion 2: The BLM will use the best available data regarding natural resources AGA's Comments: • AGA supports this approach. • AGA is pleased that the Nevada Division of Minerals (NDOM) is a cooperating agency. • BLM should obtain information from NDOM on the number of mining claims and geologic potential in the Beatty Mining District. At a minimum, this inquiry should include information for Bare Mountain, Bullfrog Hills, and Silicon-Transvaal
02.AGA-15	Criterion 3: The BLM will consider the present and potential uses of public lands and where existing RMP decisions are valid, those decisions will remain unchanged. AGA's Comments: • Mining is designated as one of the multiple land uses authorized for the Beatty area in the 1997 Tonopah District RMP. • No changes are warranted in the Tonopah RMP that would put any lands in the Beatty area off-limits to mineral exploration and mining.

CID	Resource Management Plan/Land Use Comments/Statements
02.AGA-16	Criterion 4: The BLM will consider the relative scarcity of values and availability of alternative means and sites for recognizing those values. AGA's Comments: • BLM must consider the mineral potential of the Beatty Mining District and cannot select a Preferred Alternative for the Greenlink West Project ROW that would interfere with or diminish the mineral resources, and development of those resources, in this district. • The alternative that best recognizes the unique nature and scarcity of mineral deposits4 would be to avoid co-locating the Greenlink West Project transmission line ROW on mining claims as shown in Modified Alternative C (see Figure 2).
02.AGA-17	Criterion 5: Any plan amendments will be completed in compliance with FLPMA, NEPA, and all other relevant Federal laws, executive orders, and BLM polices. AGA's Comments: • AGA supports the land management processes and analyses. • BLM needs to specifically consider claim owners' rights to use their mining claims pursuant to the U.S. Mining Law as described above in Section IV. • Compliance with Section 302(s) of FLPMA compels BLM to recognize AGA's mining claims at the Silicon deposit and elsewhere throughout the Beatty district as pre-existing land uses that conflict with the Proposed Action as discussed in Section IV. 4 According to the National Research Council/National Academy of Science 1999 report entitled "Hardrock Mining on Federal Lands," 1,000 mineral targets must be identified and evaluated to discover a single deposit that can become a mine (see page 24). • Compliance with the NEPA directive to avoid and minimize impacts compels BLM to select a different alignment for the Beatty area segment of the Greenlink West Project ROW as discussed in Section V. • By submitting these scoping comments, AGA is providing input to establish and preserve its standing as an impacted stakeholder.
02.AGA-19	Criterion 7: Existing valid planning decisions for RMPs in effect will not change unless specifically amended, and any new plan decisions will not conflict with existing planning decisions. AGA's Comments • As discussed above, the planning decision in the 1997 Tonopah RMP that designates lands in the Beatty district for multiple use and open to location under the U.S. Mining Law must remain intact. • For many years, BLM has accepted AGA's and predecessors-in-interests' annual payments of Claim Maintenance Fees for the mining claims in the Beatty district. By accepting these yearly fees, BLM has acknowledged that these are active claims in good standing. BLM's Proposed Action must not conflict with these previous planning decisions or compromise the status of these mining claims. • BLM has authorized AGA's EPOs and Notices for mineral exploration of its mining claims in the Beatty area consistent with BLM's surface management regulations for hard rock mining at 40 CFR Part 3809. BLM's Proposed Action must not conflict with these previous planning decisions or compromise the previously authorized mineral exploration activities.
02.AGA-20	Criterion 8: Any RMP amendments will recognize valid existing rights. AGA's Comments • AGA supports this approach. • As discussed in the preceding sections, BLM's Proposed Action must recognize and preserve AGA's valid existing rights to use its mining claims for mineral exploration, mining, processing, or uses reasonably incident thereto.
02.AGA-9-pt1	IV. AGA's Mining Law Rights and FLPMA Multiple Use Mandates A. Rights Under the U.S. Mining Law BLM's Federal Register Notice of Intent presents a Summary of Expected Impacts at p. 25660 that does not include impacts to mineral resources. This is either a serious omission reflecting BLM's lack of awareness of the extensive mineral activities in the Beatty area transmission line segment of the Proposed Action, or alternatively, it is an acknowledgement that as a matter of law the Proposed Action cannot materially affect mineral activities authorized under the U.S Mining Law. Either way, the Draft EIS must take a hard look at impacts to mineral resources and analyze alternatives to avoid such impacts. If avoidance is not feasible, the Project Proponent, NVE, must compensate AGA and other claim owners for any unavoidable future impacts to their mining claims. In 1955, Congress amended the U.S. Mining Law when it enacted the Multiple Use Mining Act of 1955 (Multiple Use Act). Section 4b of the Multiple Use Act (30 U.S.C. § 612) reserves to the United States the right to manage the surface and surface resources of federal lands subject to mining claims so long as the United States and its permittees' and licensees' use of the surface of a mining claim does not adversely affect the claim owner's rights to use the claim for mining purposes as established in Section 4b of 30 U.S.C. § 612(b): Rights under any mining claim hereafter located under the mining laws of the United States shall be subject…to the right of the United States to manage and dispose of the vegetative surface resources thereof and to manage other surface resources thereof (except mineral deposits subject to location under the mining laws of the United States). Any such mining claim shall also be subject…to the right of the United States, its permittees, and licensees, to use so much of the surface thereof as may be necessary for such purposes or for access to adjacent land: Provided, however, That any use of the surface of any such mining claim by the United States, its permittees or licensees, shall be such as not to endanger or materially interfere with prospecting, mining or processing operations or uses reasonably incident thereto. (Emphasis in the original.) Under the plain language of Section 612(b), BLM must not authorize the Beatty District segment of the Proposed Action because it would interfere with AGA's ability to develop its mining claims. As noted in Section III, AGA's current mine plan for the Silicon deposit places the mineral processing facilities on our unpatented mining claims in Crater Flat. The Proposed Action alignment will materially conflict with this use of our claims in Crater Flat. There are two IBLA decisions that demonstrate BLM cannot authorize a permittee or licensee to use the surface of unpatented mining claims in ways that would interfere with the claim owner's rights to use the claims for mining development. The first IBLA decision, 164 IBLA 384 (2005), voided a 1993 BLM ROW grant to Western Area Power Administration (WAPA) for the segment of a 500 kV transmission line that was located on Nevada Pacific Mining Company's (Nevada Pacific's) unpatented mining claims. Roughly one year after BLM granted the ROW to WAPA, Nevada Pacific submitted a Plan of Operations to BLM for a proposed gold mining operation. Nevada Pacific challenged BLM's ROW asserting construction and operation of the transmission line would interfere with development of the mine.

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02.AGA-9-pt2	In its ROW challenge, Nevada Pacific stated that a large transmission line on mining claims in an active (or soon to be active) mining area would create obvious practical and safety concerns that would adversely affect both Nevada Pacific and WAPA: "[T]ransmission lines conflict and interfere with mining operations. Mining operations involve personnel, equipment, explosives, storage, and earth moving activities. Placing power transmission towers and lines on, over, or near mining operations raises questions and concerns of tower stability, health and safety of mining personnel, and the effect of the electromagnetic field emanating from the power lines on both personnel and mining equipment." In this case, the IBLA voided the segment of the transmission line ROW located on Nevada Pacific's claims and instructed BLM to work with Nevada Pacific to not allow the ROW to "endanger or materially interfere with prospecting, mining or processing operations or uses reasonably incident thereto." The IBLA's explicit language in Nevada Pacific to void the ROW because it would endanger or materially interfere with "… processing operations or uses reasonably incident thereto" is directly relevant to AGA's Silicon claims where AGA is proposing to use its claims in Crater Flat for the Silicon Project processing facilities. The second IBLA decision, Robert E. Shoemaker, (110 IBLA 39, 96 I.D. 315 (1989), deals with the scope of 30 U.S.C. § 612(b). Citing from the legislative history of the 1955 Multiple Use Act, IBLA clarifies that locators of mining claims have the dominant right to use the surface of their mining claims for mining purposes and non-mining uses are subordinate and cannot interfere with the claim owner's rights under the Mining Law: "This language [in 30 U.S.C. § 612(b)]…does not have the effect of modifying longstanding essential rights springing from location of a mining claim. Dominant and primary use of the locations hereafter made, as in the past, would be vested first in the locator; the United States would be authorized to manage and dispose of surface resources, or to use the surface for access to adjacent lands, so long as and to the extent that these activities do not endanger or materially interfere with mining, or related operations or activities on the mining claim." Applying both IBLA decisions to the land use conflict that would be created if BLM grants the Beatty segment of the Proposed Action transmission line alignment, it is clear that BLM must avoid this conflict and not grant a ROW for this segment of the Proposed Action. Unlike the Nevada Pacific situation where BLM had to void a portion of the ROW it had granted to WAPA, all parties in the Greenlink West Project are fortunate that a similar conflict can be completely avoided. BLM's current Greenlink West Project planning exercise and the National Environmental Policy Act (NEPA) document that BLM is going to prepare for Greenlink West Project can avoid creating a similar land use conflict by choosing an alternative alignment for the Beatty segment of the Proposed Action. AGA believes the Modified Alternative C alignment discussed in Section III would accomplish the important objective of avoiding conflicting uses of mining claims as required by 30 U.S.C. § 612(b).
04.BTAB-12	Mining claim conflicts - There are several active mining claims in Beatty and conflicts must be addressed and resolved. Communication and cooperation between the mining companies, the applicant and BLM must take place as part of the process. Beatty must be included in the discussion about any proposed changes to the Greenlink West t ransmission line location as these changes may affect access to the routes and our economy.
09.EH-4	The project would stimulate further "renewable energy" projects that will require the production of components that would increase the demand for rare earth elements. Such demand would mean increased mining and further environmental damages.
10-ELR-6	3. Land Designations – Please indicate various land designations along each stretch of the ROW. Given our mission statement and expressed concerns, we are particularly concerned that the BLM in the DEIS documents where the proposed alignment enters desert tortoise critical habitats (USFWS 1994) and any designated Areas of Critical Environmental Concern (ACEC) managed by the BLM. As given in point 4 below, please identify protective measures that may be unique to these and any other designated conservation areas. Similarly, please be sure that as the ROW enters different BLM management areas that pertinent management plans are referenced and that specific protective measures and other policies specific to those regions are implemented for those portions of the ROW, especially with respect to the Mojave desert tortoise and other BLM special status species.
11.AM-14	We understand that the BLM will begin to review updates to the land management plans adopted in 2015 that were designed to support sagebrush ecosystems and greater sage grouse that rely on this habitat.9 The EPA recommends that an update on the status of 2015 plans be included in further NEPA documents including any changes, additional mitigations, or restrictions to sage-grouse related stipulations, if any, associated with the project area.
13.KE-10	The BLM will also decide whether to amend any of the existing Resource Management Plans (RMPs) across Nevada. We are requesting that the BLM examine Conservation Plan Amendments if this Draft EIS opens up plans. We are requesting this because there are roughly 230 square miles of SF-299 solar energy applications associated with the Greenlink West transmission proposal. The projects are only feasible because the Greenlink West project provides access to load centers from these remote basins in western Nevada--large-scale solar applications could not be built otherwise. Because of this, we are nominating a Bi-Stage Sage Grouse Area of Critical Environmental Concern, a Sarcobatus Flat Cultural Area of Critical Environmental Concern or Cultural Landscape, and a Special Management Recreation Area south of Beatty, Nevada. We are also requesting Solar Exclusion Zones to protect viewscapes, recreational access and economic tourism economies.
13.KE-12	The BLM clearly has an agenda to develop public lands for renewable energy and has manipulated the Greenlink West NEPA review to accommodate the applicant NV Energy. Renewable energy is only one part of the Multiple Use mission of the BLM. Because of the solar applications (actions) associated with the Greenlink West Project, the BLM could and should use Plan Amendments to provide environmental and community protections from sprawling large-scale energy development.
13.KE-13	There is a precedent for nominating an Area of Critical Environmental Concern (ACEC) during an RMP amendment process. During the Silver State South Solar Project environmental review, the Southern Nevada Field Office of BLM needed to downgrade the Visual Resources Class in order to approve a ROW for the massive energy project, and it opened and amended the RMP. Basin and Range Watch during this process nominated an ACEC around the solar project, and this as accepted in modified form by the BLM. The Ivanpah Valley ACEC was designated at 31,859 acres, protecting Mojave desert tortoise habitat and populations of rare white-margined beard-tongue. This is documented in the Silver State Solar South Final Supplemental EIS/PRMP Amendment, Appendix B, p. 14). The BLM interdisciplinary team determined that a portion of the lands within the Ivanpah Valley ACEC nomination met the criteria for both relevance and importance, specifically for the Agassiz's desert tortoise and for white-margined penstemon (FSEIS/PRMPA, Appendix B, p. 15). As mentioned in the response to comments to the Draft SEIS/PRMP Amendment, an ACEC alternative that included the entire ROW of the solar project was rejected, but a large area outside and surrounding the solar project was designated as a new ACEC: "[T]o include consideration of the ACEC nomination in the Draft Supplemental EIS/PRMPA required the exclusion of the ACEC from the Project footprint. The resulting ACEC does include a lower quantity of alluvial fan area, as noted. The recommendation to include an alternative that includes the ACEC but not the proposed Project would not be responsive to the ROW application. Such an effort would need to be pursued as a separate action unrelated to the proposed Project" (FSEIS/PRMPA, p. D-169). The BLM-preferred alternative proposed designation of a 31,859-acre ACEC in order to provide for a desert tortoise connectivity corridor (FSEIS/PRMA, p. 2-3). A portion of the important white-margined penstemon habitat overlapped with the acreage for a desert tortoise corridor within this proposed ACEC. The Congressional disposal area for the Southern Nevada Supplemental Airport contains 4,181 acres of the white-margined penstemon habitat around Roach Dry Lakebed. Populations within the disposal boundary were therefore not analyzed further for ACEC designation within this planning effort. The remaining penstemon habitat was located in a population around Jean Dry Lakebed and in Hidden Valley. The Ivanpah Valley ACEC nomination area does not include this entire population. BLM analyzed this population as a whole unit within the Jean Lake ACEC nomination (FSEIS/PRMPA, Appendix B, p. 15). It should be noted that the Ivanpah ACEC nomination and designation occurred outside of the Las Vegas RMP revision (which has been delayed). (See https://www.basinandrangewatch.org/Ivanpah-ACEC.html for the nomination to BLM of the Ivanpah ACEC.)

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13.KE-17	Bi-State Sage Grouse Plan Amendment In its May 17, 2022, Beatty, NV scoping meeting, BLM explained that during the Greenlink West environmental review process, many land use plans may need to be opened and amended, including the 2016 Nevada and California Greater Sage-Grouse Bi-State Distinct Population Segment Land Use Plan Amendment (LUPA) for the Carson City District and the Tonopah Field Office located in Nevada. Now that the Bi-State sage-grouse is once again a candidate for listing under the Endangered Species Act due to recent litigation2, this taxon needs a more thorough review and higher level of protection. Simply attempting to amend this plan—which guides multiple agencies and stakeholders towards stabilizing and recovering the bird—in order to construct high-voltage lines over its mountain habitats--is simply unacceptable. Weakening the management of this declining taxon to allow a giant transmission line through its range is counter to the goals of recovery. New transmission creates a risk for catastrophic wildfires in sage grouse habitat. Increased drought and climate change greatly increase this risk.
13.KE-49	This project should be delayed until the Nevada statewide RMP revision process is started.
13.PG-5	We ask that the BLM evaluate a range of alternatives that would avoid, minimize, and mitigate specific environmental impacts; fully disclose the project's direct, indirect, and cumulative impacts in the EIS; and work collaboratively within the agency to integrate this project with broader planning-level initiatives.
13.PG-16	The BLM has a timely opportunity to integrate project-specific analysis as part of the Greenlink West EIS with a state-wide resource management planning effort. Identifying areas at the planning level where renewable energy development and associated transmission infrastructure can have the fewest environmental impacts would directly inform the Greenlink West EIS. At present, it appears the reverse is happening where individual projects, including the Greenlink West project, are driving the BLM's planning process.
13.PG-17	A true smart from the start approach would involve the BLM Greenlink West EIS team working closely with the BLM Nevada-wide Resource Management Plan team to programmatically evaluate and designate corridors and the locations for future renewable energy development before issuing a decision on the Greenlink West EIS. Prioritizing resource management planning gives the BLM the foundation needed to make informed project-level decisions.
14.C-10	The roadway network attendant to Land Use Permit N-66753 is in the area of U.S. Highway 50 south to Artestia Lake and Mason Valley, west generally to the Lyon County/Carson City boundary, and east to the Sand Springs Range in Churchill County. The proposed action for the powerline route along with access roads to and from the powerlines sta1ting at the Fmt Churchill Substation and up to U.S. Highway 50 East in Dayton/ Silver Springs/ Stagecoach, will directly affect the HTI/NATC Land Use Permit roadway network. All roads indicated as "Existing Road Requiring Improvement" proposed in this area will negatively affect HTI/NATC's operations and our ability to continuously suppo1t the DoD and all of the industrial base involved in that effott. Such maintenance activities will destroy the reference profiles and would require millions of dollars and years of effott to reestablish. In the past, HTI has borne the cost and manpower for roadway maintenance after OHV events, public use, or extreme weather; but as a small, family-owned business, the operation cannot encumber the costs of returning the proposed action roadways back to their original condition if the current proposed action route is approved.
14.CH-2	HTI and BAH are responding to this request for public comment for the GL WP as our organizations directly have significant hist01y and access to pertinent details with three of the eight planning criteria called out in the Bureau of Land Management (BLM) Federal Register Notice of Intent. The first criteria related to HTI and BAH is Criteria 3: "The BLM will consider the present and potential uses of public lands and where existing RMP decisions are valid, those decisions will remain unchanged." The details of the HTI/NATC's ongoing use of public lands are substantial and are fmther detailed within this response. Criteria 8: "Any RMP amendments will recognize valid existing rights" applies as HTI holds existing BLM Land Use and Grazing Permits. Additionally, with respect to Criteria 6: "The BLM will seek coordination and consistency with other government programs including Tribal plans and policies". HTI/NATC is a Department of Defense (DoD) contractor, a pait of the Defense Industrial Base as defined by the Depaitment of Homeland Security, and provides essential products and services required to meet national security commitments to the Federal Government and the U.S. Military.
14.CH-4	HTI and BAH each own significant real prope1ty within the proposed action route of the GL WP. HTI also holds BLM issued and renewed Land Use Permit N-66753, which would be adversely affected by the proposed action route. HTI also holds two BLM grazing allotments which allow HTI to sustain a cattle operation on its prope1ty as well. To that end, HTI and BAH would incur significant adverse business, environmental, and individual impacts if the currently proposed action route is approved. Please understand that HTI and BAH are not expressing opposition to the GL WP; rather, this public comment is offered in hopes of the selection of one of the alternative action routes.
14.CH-5	As to the impact to the business activities of HTI and BAH, each organization pe1forms significantly sensitive activities which entail strict security protocols and require precise and uninterrupted test activities. HTI/NATC under the auspices of Permit N-66753 utilizes BLM administered public lands for vehicle and equipment testing. HTI/NA TC conducts year-round development and certification tests for commercial and militaiy vehicles and equipment including without limitation, motorcycles and passenger cars, over the road commercial and vocational trucks, and a broad range of wheeled and tracked militaiy equipment for the Depaitment of Defense (DoD). HTI/NATC and BAH utilize their owned calibrated facilities to continuously evaluate these same systems.HTI/NATC tests vehicles on approximately 235 miles of existing roadways on public land. The road condition and maintenance of these ELM-administered roads is a large part of the approved Land Use Permit terms. HTI/NATC has the sole responsibility to conduct road maintenance on a routine basis on p01iions of the road network. Roadway maintenance includes the repair of road washouts and other damage caused by weather related events, repair of roadway damage resulting from off-highway vehicle (OHV) racing, repair of roadway ruts created from use during wet weather, repair of general roadway wear from use by the public, local ranchers, and HTI/NATC test vehicles. HTI/NATC completes the road maintenance not only for the sake of controlled and repeatable vehicle testing activities, but so the public can enjoy these roadways for recreation purposes, as well.
14.CH-8	Indeed HTI/NATC have a long and extensive relationship with the BLM. HTI/NA TC has been testing vehicles on existing roads that traverse private, State, Bureau of Reclamation, Nevada State Parks, Walker River Indian Reservation, and BLM-administered public land since 1957. In 1984, the BLM issued HTI/NATC Land Use Permit numbers N-47168 and N-3649 authorizing HTI/NATC to test and operate vehicles and equipment on public land for commercial purposes. Those permits expired in May 2002. Land Use Permit N-66753, along with Environmental Assessment NV-030-01-021 and the Road Use Plan, were generated to suppott a nationwide commercial and DoD demand for vehicle testing services such as those that HTI/NATC provides. DoD vehicle testing revolves around what is deemed a "duty cycle", in which each specific vehicle needs to be tested against a pa1ticular breakdown of terrain roughness. The terrain roughness is determined by the location to which vehicles will be deployed, and the end users of the vehicles. HTI/NA TC' s service is to replicate the exact terrain roughness, which tests vehicles in real world situations. Therefore, the condition of the roadways on HTI/NATC privately-owned land, as well as on the public lands, needs to stay in its current, unchanged, specific terrain roughness.
14.CH-13	HTI/NATC and BAH have maintained large sections of their private property in as natural a habitat condition as possible. HTI/NA TC and BAH prohibit hunting on their prope1ties with exception of depredation tags as required for herd management, as this approach suppotis the growth of indigenous species in the area. Ce1tain areas on that private prope1ty and the surrounding locations have been identified as a natural cottonwood forest with the attendant range of wildlife species in these micro-climate areas. Within the proposed action, the powerlines would directly cross the Carson River in these locations, completely disrupting this natural habitat which has taken many years to protect.

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14.CH-16	Finally, the cattle grazing on the proposed action route is a key patt in wildfire hazard mitigation. The proposed action route has all three power lines crossing through the Clifton Flat allotment, and one power line goes through the Churchill Butte allotment. Although the cattle may be minimally affected by the loss of feed due to the powerline base structure footprint; the construction period will negatively affect the cattle operation, as the majority of the two allotments may not be able to be used for 1-3 years. This pause in grazing rotation on these areas will inherently increase wildfire threats, as well as, cause the cattle herd to stay on BAH's and HTI's privately-owned land for consecutive months and years, leading to overgrazing practices.
14.RS-2	Maps of TWS Recommended Changes: *[Includes Map]* WWEC 18-224 / MP 106-165: Current location description: Monte Cristo Mountain Range in the northwest to Mount Jackson Ridge in the southeast. Mostly in Esmerelda County, with a small section in Nye County. Concerns: Corridor intersects several high-quality LWC units east of Silver Peak in the Montezuma Range, as well as in Weepah Hills. Alternatives to Consider: The Agencies should adjust the corridor to turn east at MP 106 and follow Hwy 95 on past Tonopah and Goldfield, rejoining the existing alignment at MP 165. Alternatively, the Agencies should adjust the corridor to turn east at MP 85.5 to follow the existing transmission line through the Monte Cristo Valley and on to the southeast into the Big Smoky Valley and then following Hwy 95 to the east and south past Tonopah and Goldfield.
14.RS-3	ALT ROUTE: *[Includes Map]* Both of these adjustments would also have the benefit of providing true access to the Millers SEZ to facilitate solar development there, as well as the opportunity to collocate solar development in lower-impact lands between the existing Crescent Dunes solar project and the Millers SEZ, which the current alignment does not.
14.RS-4	WWEC 18-224 / MP 163-225: Current location description: Mount Jackson Ridge in the northwest to Amargosa Desert in the southeast. Mostly in Nye County, with a small section in Esmerelda County. Concerns: Corridor overlaps with LWCs Citizen-Identified LWC units from MP 165 to MP 225. In the Report, the Agencies propose shifting the corridor 1 to 5 miles west from MP 163 to MP 225. While the Corridor Summaries document states that this revision might help avoid Desert Tortoise connectivity habitat, this new route would cut through two BLM-identified LWCs (BLM Unique ID# NV-050-352A: Stonewall Pass, and BLM Unique ID# NV-050-03R-15: Tokop) and would run for 20 miles across two Citizen-Identified LWC units in the Sarcobatus Flat. TNC: The Oasis Valley has high conservation value with many endemic species, surface water, and high-quality bird habitat. It is preferable to avoid siting transmission in Oasis Valley, however there is a corridor extending north from Beatty to the Tolicha Peak Facility on the Nevada Test and Training Range. Siting transmission adjacent to existing transmission in the Oasis Valley is acceptable. Other possible routes that might minimize conflict include following the route of Interstate 11, which is proposed to be constructed west of the Bullfrog Hills. Alternatives to Consider: We suggested following existing transmissions, south around the town of Beatty or following alignment along Hwy 95 and following a proposed revision to Beatty and beyond. The Agencies should not make this shift into largely undeveloped habitat. Instead, the Agencies should keep the original route until MP 193 and then turn south, following existing disturbances, including the existing transmission line, previously installed for the Air Force Tolicha Peak Facility, and then down around the town of Beatty on the west side. Alternatively, the Agencies should keep the existing alignment along Hwy 95 from MP 163 to about MP 190 (narrowed where needed to avoid LWC), and then turn due south, connecting up with the revision proposed in the Report just north of the Bullfrog Hills and following it from there on to the southeast to Beatty and beyond.
21.DG-1	Regarding land management, do you anticipate that the BLM will withdraw land, and if so will such land withdrawal be closed to any other land uses?
21.JG.-1	I'm with AngloGold Ashanti here in Beatty. We do conduct exploration activities, load claims on east and west of U.S. 95 here in Beatty. And we are -- while we're not opposed to the project, we certainly have interests in many of the sections in township and ranges in the upper regions of Crater Flat Basin. We will be providing comments and alternative and suggestions, as many of the people here have, on alternative alignments in order to maintain those mineral interests there and any future development. We have associated with them, and we are conducting mineral exploration and other baseline investigations in those areas now, and we expect to do that into the future. So those are the comments, and we will be providing comments within the time frame. We've -- in recent meetings with the BLM and state, just to associate and socialize our activities down here, it's upwards of $47 million in the Southern Nye County area. And that includes all of our activities, you know, the wide range, and much of that is being spent here in Beatty.Yeah, as part of our activities here, we originally started on the east side of the highway. In -- in review of the company Corvus Gold assets, we have since acquired those on the west side of U.S. 95 and are looking at a development over, you know, a much larger area. And so we have, actually, interest in both, you know, the alignment on both sides of the highway. Anyway, but it's a significant investment in the area, so we will follow these proceedings.
21.JGL-6	There are several active mining claims in the Beatty area and conflicts must be addressed and resolved. Communication and cooperation between the mining companies, the applicant and BLM must take place as part of the process.
22.KE-11	Finally, on your plan amendment, I just want to point out something the BLM did in 2014, an applicant wanted to establish two solar projects (Stateline and Silver State South) and in order to do that they had to change some of the visual classes, and they did amend that Southern Nevada resource plan and with it they created an Area of Critical Environmental Concern (ACEC), so I think it is inaccurate to say that you cannot create Solar Energy Zones or Solar Exclusion Zones with this plan amendment and you can make a Purpose and Need that would accommodate some people's desires to keep those solar projects out of certain areas. So I don't think you are being accurate there.
22.KE-8	If you amend several RMP plans for the Green Link EIS, you can also create new solar zones and exclusion zones.
27.KB-3	The only strategy we can foresee to avoid permanent major impacts to NV public land and resources, dramatically changing our landscapes into the foreseeable future, must be a process in which a science-based site-specific & statewide evaluation of the indirect & cumulative effects of both the conservation and development components are considered concurrently. A logical way to achieve this could be through the statewide Management Plan Revision (RMP) process. Such a deliberative inclusive process would guide the wisest decisions in prioritizing site-specific locations for both the 30x30 goal and the energy, minerals and transmission goals, laying the essential map for win/win maximum cost/benefit actions. Along with both Greenlink West & North, an analysis of the existing Eastern NV route (see 27.KB-9 1.b below) must be folded into such a NEPA study to address the reality that what is being considered is nothing less than the fate of the landscape, wildlife, cultural and historical resources and multiple uses of our entire state for the foreseeable future.

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27.KB-9	D. NEPA process design: 1) NV BHA supports: a.) A process that includes, at minimum, the evaluation of indirect & cumulative effects of the route itself, the location of sub-stations and the projected related projects already and/or likely to be along the proposed route. We question the irresponsibility, if not legality, of NOT doing so. b.) (As per item A. 5.) A process that simultaneously evaluates indirect & cumulative effects of Greenlink West, North and the existing East line. c.) Potential loss to 30x30 goals be analyzed concurrently. d.) (as per item b above & A.5) Such an analysis would best be conducted within a RMP process, inclusive of wildlife/flyway corridors, prioritized least impactful “opportunity zones”, along with incentives to use them and disincentives for development outside such zones. 2) The "cart before the horse” process: We are concerned that many renewable energy & mineral exploration or expansion proposals are being submitted at an increasing rate to both BLM & NDOW along the proposed corridors of both W & N Greenlink before the NEPA process has begun and long before any final route decisions will be made. Developers are posing questions that require cost of the time and energy of NDOW & BLM employees. This presents the grave danger of permanent negative impacts to our public lands before any restrictions related to avoid, minimize, mitigate can be applied to the current Greenlink proposals. This is entirely and dangerously backward. (See section A. 4 & 5 above) Again, 30x30 goals cannot be disassociated from development proposals.
30.JB-2	So the BLM is willing to donate our public lands without any guarantee of real need and the best alternatives to ripping up the desert? Shouldn't that be built in to your considerations before eliminating our public lands?
30.JB-3	You mean you aren't going to touch the desert floor with this corridor?
34.JM-3	Have you considered how Greenlink will co-locate other future linear ROWs like I-11?
40.SS-1	Defenders of Wildlife is excited about the opportunities the Greenlink project offers to expand renewable development and help Nevada meet its renewable energy goals, they have concerns about the section of the line that follows the West-Wide Energy Corridor (WWEC) 18-224 (Near Esmeralda Substation). This section of the proposed transmission line intersects several high-quality Lands with Wilderness Characteristics (LWC) units and also fails to connect to the nearby Millers Solar Energy Zone (SEZ).
40.SS-3	Rather than abandon SEZs or DLAs, is there an opportunity to improve incentives to promote development there?
47.RR-9	And the line will require private property seizure in areas close to Reno by eminent domain.
50.RS-1	Comment consists of a copy of an article entitled "Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation"
52.PG-2	Could you expand on the need for an RMP amendment as part of this proposal?
52.SN-9	Friends of Nevada Wilderness proposes the following as the PREFERRED ALTERNATIVE: Under the current proposal, a large percentage of the 18-224 Greenlink transmission corridor, especially from milepost 87 to milepost 166, crosses previously undisturbed public lands with medium to high potential conflicts. We propose rerouting this section north of milepost 166 along US 95, through the Millers SEZ, and then follow the existing 120-kV transmission corridor from Millers to milepost 87, crossing disturbed public lands with low potential conflicts, following existing transmission right of ways and highway infrastructure. This proposed reroute would only increase the length of the Greenlink Transmission corridor by 5 miles. This proposal: - Follows the transmission recommendations found within the 2010 Millers SEZ Draft Solar PEIS, pg 11.7-4. - Is in compliance with the court-ordered 2012 Settlement Agreement for Section 368 Corridors to reach the “diminution of the proliferation of dispersed rights-of-way (ROWs) crossing the landscape.” - Follows the recommendation made in the April 2022 Energy Policy Act of 2005; Section 368 Energy Corridor Review; FINAL REPORT: REGIONS 1-6 (see Figures 3-1 & 3-2 Recommended Revisions, Deletions, and Additions to Section 368 Energy Corridors). Rerouting the corridor to follow the existing utility corridor north of Millers SEZ, up the Poleline Road to Fallon, and on to Fernley to tie in with the Northern Nevada Utility grid and the potential Checkerboard SEZ along the Interstate 80 multimodal corridor would align the Greenlink Transmission corridor with the “B1” Segment and connect to the northernmost “B2” Segment via the “e” Optional Segment for the Northern half of the Proposed Interstate-11 Corridor (see NDOT Proposed Range of Corridor Alternativeshttps://www.dot.nv.gov/home/showpublisheddocument/14018/636570426552700000). FNW REQUEST: Analyze the Friends of Nevada Wilderness preferred alternative.
53.RL-1	Do you have a map showing the existing energy corridors?
72.TD-6	We encourage the BLM to consider Greenlink West, Greenlink North and associated solar projects in the statewide Resource Management Plan (RMP) that has been proposed by the Nevada State Director of the BLM. It would appear to be more efficient to complete the statewide RMP analysis first and include the relevant projects and any other potential power line expansions in that single analysis.
74.PG-18	Integration with BLM Resource Management Planning The BLM Carson City, Battle Mountain, and Las Vegas RMPs do not provide the BLM, cooperating agencies, or the public with the up-to-date planning framework needed to fully understand the implications of this project relative to other BLM-managed resources. The BLM Nevada State Office is proposing a Nevada-wide RMP modernization project that would bring new science, current data, and updated plan-level direction for managing BLM-administered public lands. Current planning documents would comprehensively inform utility corridor alignments that would result in the least impact on natural and cultural resource values, potential new designated leasing areas for new clean energy projects, and areas where new energy and infrastructure pose the greatest risk to resource values and other resource use opportunities.
74.PG-20	We appreciate the BLM’s consideration of these comments, and we hope they contribute to a draft EIS that evaluates smart-from-the-start alternatives, fully discloses the indirect and cumulative impacts of the project, and is supported by updated RMPs.
77.TA-10	Additionally, cumulative impacts to GrSG and habitat require analysis in this EIS and potential RMP amendments. Please include appropriate science-based analysis.
81.CO-3	Renewable Energy Transmission Corridor The enabling legislation for Tule Springs Fossil Beds NM states under Section 4, Renewable Energy Transmission Facilities: *On receipt of a complete application from a qualified electric utility, the Secretary, in accordance with applicable laws (including the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and title V of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1761 et seq.)), shall issue to the qualified electric utility a 400-foot-wide right-of-way for the construction and maintenance of high-voltage transmission facilities depicted on the map entitled ‘‘North Las Vegas Valley Overview’’ and dated November 5, 2013, as ‘‘Renewable Energy Transmission Corridor’’ if the high-voltage transmission facilities do not conflict with other previously authorized rights-of- way within the corridor. (Pub. L. 113-291, 128 Stat. 3791 (2014))* Issue: NPS must receive and review right-of-way (ROW) permit applications for infrastructure proposed within the boundaries of an NPS unit, or the NPS’ responsibility to determine whether to issue a ROW permit within a park unit in accord with applicable laws and regulations. The NPS also determines the terms and conditions of a ROW permit to meet NPS statutory, regulatory, and policy requirements. Recommendation: The NPS recommends and offers to work with BLM to ensure the NEPA analysis is sufficient for the requirements of both agencies.

CID	Resource Management Plan/Land Use Comments/Statements
81.CO-4	Utilities that pass over, under, or through NPS-managed land must be authorized under an NPS issued ROW permit (54 USC 100902, 36 CFR Part 14). NPS ROW permits allow utilities to operate and maintain infrastructure over, on, or under NPS lands; they set the terms and conditions for such operation and maintenance. NPS Director's Order 53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the used of NPS lands." The NPS has recommended to the project proponent and its contractors, and to the BLM and its contractors, that a third-party engineering consultant evaluate the project proposal to identify any micrositing or route alternatives that would minimize impacts to NPS lands and resources. Issue: The NPS understands there are several routing alternatives through Tule Springs Fossil Beds NM, as stated in previous Cooperating Agency meetings and in the most recent Plan of Development (POD). The POD does not include an NPS ROW permit in the project proponent's requirements for any routing alternatives. The project proponent is required to to submit a ROW application to the NPS. The NPS is aware of resource surveys the project proponent is actively conducting to include in a NPS ROW application package. Recommendation: The NPS has previously provided information to the project proponent and BLM staff on the NPS ROW permitting process. The NPS recommends the BLM and project proponent meet with NPS personnel from Tule Springs Fossil Beds NM and the regional office for Interior Regions 8, 9, 10 and 12 to further clarify the NPS ROW application and permitting process. The discussion will include all supporting documents required in an SF-299 ROW permit application; NPS ROW permitting standards including cost recovery, annual rent calculations, permit terms (generally for 10 years' duration); and activities allowed under a ROW permit. As the federal agency with administrative authority over public lands in Tule Springs Fossil Beds NM, the POD must identify the NPS as a potential permitting agency. In addition to resource surveys, the NEPA environmental analysis will need to include site-specific analyses if the proposed routes across Tule Springs Fossil Beds NM are retained as alternatives.
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).
81.CO-17	The NPS serves as a NEPA Cooperating Agency for the Greenlink West Project and looks forward to effective collaboration and cooperation with the BLM. Issue: The Federal Register Notice initiating the scoping process for this project was published on April 29, 2022. Recent changes to federal NEPA regulations took effect May 20, 2022. The "Phase One" final rule reinstated three key provisions to (1) Purpose and Need, (2) Agency NEPA Procedures, and (3) Definition of "Effects" or "Impacts". Recommendation: The NPS recommends that the BLM clarify how Phase I final rule may be incorporated into the NEPA process for the Greenlink West project. The NPS supports a redefinition of the Purpose and Need according to the revised regulations, to consider the BLM's purpose and need and range of reasonable alternatives, particularly around Tule Springs Fossil Beds NM. A robust and comprehensive analysis and discussion on the Cumulative Effects of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, particularly around Death Valley NP, should also be included in the EIS. Overall, due to the level of development interest (i.e., solar, transmission, gold and lithium mining) in the Amargosa Valley, the NPS recommends the BLM collaborate with other agencies and partners on landscape level analysis and planning of the Nevada desert to identify areas most appropriate for development and to minimize impacts to sensitive resources.

CID	Greenhouse Gases and Climate Change Comments/Statements
08.JH-2	I would also like to suggest that you coordinate with the state's climate action plan, which basically calls for phasing out natural gas in this state by 2024, shows -- what I see here, hooking into national gas plants at Apex. If they're going away in less than 20 years, that doesn't make a lot of sense to hook up and not -- you're not going to be done with this until 2026 at least. It's not very many years to basically make use of that. So I think that everything that could possibly impact that and impact this project needs to be included in the EIS.
08.JH-4	It also needs to address the state's climate action plan and how this plays into that.
10.ELR-17	Impacts to Be Analyzed – We request that the DEIS address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the Project that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires, and how the proposed action would increase the occurrence of off-highway vehicle use on the access roads and unauthorized roads. We strongly urge the Proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires and other impacts associated with authorized and unauthorized vehicle use in the desert off of highways. The plan should integrate vegetation management with fire management and fire response.
11.AM-19	Executive Order 13990 on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (January 20, 2021) asserts that the Administration should bolster resilience to climate change. In the Draft EIS, discuss how the effects of climate change could impact the project and project area and how the project would be designed to address potential climate change-related impacts. For example, describe how the Greenlink West Project would be affected by foreseeable changes from predictable trends – a scenario of continued decreasing precipitation, changing frequency of intense storms and related flood events, increased occurrence of wildfires, and persistent drought.
11.AM-9	The EPA recommends that the Draft EIS include a discussion of reasonably foreseeable effects that changes in the precipitation patterns, hydrology in the region, vegetation distribution in the watershed, and temperature may have on the proposed project and the project area. Identify design considerations needed to accommodate future anticipated effects (e.g., changing precipitation patterns, increased intensity of storms) such as upsizing or adapting stormwater management systems. Evaluate what portions of the project area may be included in the 100-year floodplain so that early consideration may be given to improving the resiliency of the project. Consider the anticipated extent and depth of overland flows at points where critical transmission infrastructure would be located using a 500-year flood event model, as compared to a 100-year event.
12.MD-2	But I guess my main point is everybody here should educate themselves on United Nations Agenda 21, 2030, sustainable development goals, World Economic Forum, and how that plays into your future. Because it's all about the green agenda, green energy, all of that good stuff. We all love the environment. Green energy sounds like a good idea, but what does it really mean? So I'm not here to tell you about it. I'm here to just give you some ideas of things to look into. And it's your future, so educate yourself or don't. It's up to you.
13.KE-47	The line will hook into natural gas power plants at Apex just north of Las Vegas and eventually transport power north to large tech servers and factories in the Reno-Sparks area. These natural gas power plants generate approximately 2,000 megawatts, and an analysis of CO2 impacts should be undertaken. In addition, life cycle analyses should be completed describing the steel manufacture for the power poles, transportation emissions, SF6 gas emissions, helicopter and diesel construction emissions, and the total carbon footprint of constructing such a massive powerline in remote wildlands, over mountain ranges, and through populous cities.
18.JB-1	I'm writing to request that you and the BLM reject the application for the Greenlink West transmission line. There are numerous problems with the proposal and the project overall, including destruction of a vital carbon-sequestering and biodiverse ecosystem, the already struggling watersheds, sensitive ecosystems that provide unique habitat for tortoises and many other animals and plants, national monuments and ancient cultural resources, and the vast views that make the desert so special for tourists and travelers.
18.JB-2	In the guise of a green contribution to help stop climate change, you are proposing the opposite: scraping away the desert crust that helps the earth sequester carbon. It may not be as much as redwood trees, but the science increasingly points out the important work the desert crust does. Why not tell the corporate developers to come back after they've covered a few hundred square miles of parking lots with solar panels or use some of the vast amounts of already-disturbed land that has been identified for years? Why allow them to tear up carbon-sequestering desert before doing what makes much more sense first?
23.JH-3	Nevada Power is touting the Greenlink project as the key to reducing the carbon footprint of electric power production in Nevada. Hence, it is only fair that we know the carbon fooprint of the Greenlink line and all its connected actions. This information is essential if there is to be an informed decision on the need for the project and how it should be configured.
50.RS-1	Comment consists of a copy of an article entitled "Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation"
51.SB-2	The Notice of Intent (NOI) includes a list of significant components that require analysis. However, the NOI does not specifically require an analysis of how the project may contribute to climate change, an increase in greenhouse gas emissions, or affect carbon sequestration. For instance, there are no greenhouse gas emission estimates coinciding with the immediate construction and long-termmaintenance components of this project. Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org. MBCA is a 501©3 non-profit, community based, all volunteer organization Another example attends to desert land restoration alternatives versus land disturbance caused by solar PV production. Importantly, the current EIS guidelines are also lacking an analysis for the CO2 that has been captured and sequestered underground by natural phenomena and by native plant species for hundreds to thousands of years. (See attached article by Dr. Michael Allen)

CID	Greenhouse Gases and Climate Change Comments/Statements
51.SB-4	1. The Significance of Carbon Capture in Deserts - There are several ways in which deserts store carbon. To start, desert plants store carbon in their biomass just as other plants do; through photosynthesis, plants take in CO2 from the air and convert that into tissue. Many desert plants also have important relationships with underground fungi: roots bond with these fungi in a mutually beneficial relationship. As part of this relationship, the plants transfer carbon to the mycorrhizae, which also store carbon. The majority of stored and sequestered carbon, however, is in soils. Plant or animal excretion and decomposition releases some carbon, which reacts with calcium in the desert soil to create calcium carbonate crystals. Since some desert plants' roots grow to over a hundred feet, these crystals, called caliches, can be deep underground. Caliches build into larger chunks over time and create carbon sinks. Additionally, when the root fungi die, they leave behind their waxy coating, which aggregates and helps keep carbon in the soil. For their storage and sequestration potential, arid-semiarid soils are considered the third largest global pool of carbon. 2. The Importance of Desert Carbon Sinks - The most conclusive evidence of California desert carbon storage potential comes from a 10-year study in the Mojave Desert at the Nevada Desert Free-Air CO2 Enrichment Facility (NDFF). This study compared plots of desert with current CO2 levels to plots with projected 2050 CO2 levels. To do this, they piped extra CO2 over the plots. At the completion of the study, the researchers compared the carbon between the plots with current CO2 levels and those with projected CO2 levels. They found that the plots that received extra carbon were able to store significantly more carbon than those that received current carbon levels. This indicates that as atmospheric CO2 levels rise, deserts will have increased capacity to sequester in response to projected elevated atmospheric CO2. Deserts store 9.7% of California carbon and based on the NDFF experiment, and this amount may increase with climate change. A report by the National Parks Service shows that Death Valley and Joshua Tree National Parks and the Mojave National Preserve were within the top 10 park units with the highest annual net ecosystem carbon balance. https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=Greater+ecosystem+carbon+in+the+Mojave+Desert+after+10+years+exposure+to+elevated+CO2&btnG=
51.SB-5	We request the EIS be amended to address carbon sequestration impacts on undisturbed lands along the 474 mile transmission line. We recommend that these lands be analyzed for: 1. The amount of CO2 that will no longer be captured and sequestered, and 2. The amount of stored carbon that will be released through anthropogenic disturbance and exposure over (1) the short term construction phase of this proposed project as well as (2) the long term operational lifetime of this project.
61.LC-3	Will the Greenhouse gas emissions impacts be analyzed of supplying energy from the fossil fuel generating stations at Apex/Harry Allen Switching Station to supply electricity to large industrial facilities in the Reno-Sparks area?
77.TA-16	The DOI has promised to update rangeland management to include impacts from climate change.
77.TA-18	Climate change and impacts to surface/ground water, wetlands, and washes and all other water loss impacts to neighboring populations and wildlife, especially during times of significant drought, demand evaluation of impacts from proposed Action to all wildlife/reptiles/raptors/pygmy rabbits, rangeland health, sagebrush habitat, and wild horses and burros reflected in the forthcoming EIS. Please include appropriate science-based analysis.

CID	Light Pollution and Night Sky Comments/Statements
11.AM-11	In the Draft EIS, consider the value of night skies, particularly in rural areas of Nevada, which offer some of the darkest skies and best opportunities for stargazing. The EPA recommends that BLM promote natural dark skies and minimize artificial lighting to preserve these night skies. Good lighting conditions are important for wildlife habitat, protecting cultural resources, enhancing wilderness character, stargazing, wayfinding, and avoiding human wildlife conflicts. Use sustainable outdoor lighting principles to the greatest extent possible: Light only if you need it; Light only when you need it; Light only where you need it; Use appropriate color spectra; Use the minimum of light necessary.
21.JGL-4	The proposed Beatty Material Yard 5 on twenty-five acres of land is on a parcel that includes the Beatty General Improvement District driving range and a portion of the Beatty Cemetery along the Highway U.S.-95 frontage. We are opposed to this due to its proximity to the Beatty High School, which is across the street. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing. As avid astronomers, we request, any location in or near Beatty be night sky friendly with security lights that minimize blue light emissions, and are fully shielded and downward facing.
52.SN-5	The area offers unparalleled and unencumbered opportunities to experience, explore, and photograph the astronomical wonders from the North Star to the southern horizon in one of the darkest places in America. The proposed Greenlink Transmission line and Esmeralda Substation is proposed to be built on and through this area and the associated solar developments will take a sizable bite out of these unique and fragile lands and surround the remaining natural lands with massive industrial photovoltaic plants. The dark skies this area is known for will be significantly impacted. The recreational, astrotourism, and natural visual resources of this entire area will be forever degraded and will preclude quality recreational development and enjoyment.
81.CO-13	Night skies are a critical component of natural, cultural, and historic resources across the NPS. Dark night skies enhance the qualities of solitude and undeveloped wilderness character that animals depend on for survival, park visitors seek for connections, and many cultural-historical parks require for preservation. Issue: The NPS is concerned about impacts to the visitor experience from artificial lighting related to the Greenlink West Project. Death Valley NP showcases some of the darkest night skies in the United States and is certified as a Gold Tier International Dark Sky Park. Stargazing and astronomy programs are some of the most popular ranger-led activities and attracts planetary scientists and visitors from around the country and world. Although light pollution from Las Vegas inhibits most of the night sky surrounding Tule Springs Fossil Bed NM, portions of the night sky can be still viewed in the park, even from the edge of the urban interface. The park recently launched a Night Sky Astronomy program to share stargazing experiences with neighboring urban communities. Recommendation: The NPS recommends analysis and comparison of the night sky impacts between the alternatives. Furthermore, the NPS requests that lighting plans for alternatives include consideration for the International Dark Sky Park status of Death Valley NP and address dark night sky values. The NPS also requests that lighting plans for project infrastructure near NPS units address wildlife and ecosystem values based on current scientific literature and best practices. The NPS Natural Sounds and Night Skies Division is available to share resources and experiences from other projects.

CID	Geology, Soils, and Paleontology Comments/Statements
03.AS-1	The proposed alignment will negatively impact the Tule Springs Fossil Beds National Monument and the paleontological resources. •Ice Age Fossils and site damage would be irreparable due to the placement of the power pole supports and base. •Other options should be explored to preserve the historical significance of the Tule Springs Fossil Beds National Monument, including use of existing poles if capacity available.
03.JB-2	And the whole state of Nevada will be a dust bowl if that power line goes through and the 230 square miles of solar projects that are planned along that line are built.
04.HG-1	There are so many special places in the path of this proposed transmission line, and I would just like to mention a couple of them that are the most special to me and I don't think have been getting a lot of attention. A short side trip off of Highway 95, south of Beatty, brings you to a beautiful valley still mostly unmarked by human presence, Crater Flats. In my opinion, this valley should be preserved as a geologic landmark. It is geologically unique. I think we should protect geologic resources in general, not just paleontological resources. On the west side of Crater Flats, there are mountains, hundreds of millions of years' worth of strata building up to the sky, multi-colored strata. On the east side, the dramatically [inaudible] of Yucca Mountain is exposing the history of violent pyroclastic flows and ash falls. And in the middle, there's a series of basalt [inaudible] of various stages and various states of erosion. And at the south end is Busted Butte, which has a beautiful prominent normal fault exposed in it. And this transmission line is proposed to cut right through that special valley.
05.CD-2	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources.
05.CD-3	The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
09.LO-2	It's so hot and so dry, and it's going to create so much more dust. You know, we get the dust warnings now. That's new. And it's bladed. It's all bladed, just like development. It should be counted as development.
11.AM-8	Construction of the Greenlink West Project infrastructure could cause significant surface disturbance. Even temporary disturbances have the potential to create long-term environmental impacts, including soil erosion, invasive plant species growth and habitat loss. The EPA encourages BLM and NV Energy to work cooperatively to ensure that the amount of surface disturbance is minimized to the extent practicable. We recommend that the Draft EIS discuss soil characteristics, including slope gradient, hydrologic soil group and erosion hazard within each alternative alignment analyzed in the EIS.
13.KE-30	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11). The primary legislation pertaining to fossils from NPS and other federal lands is the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11) which was enacted on March 30, 2009 within the Omnibus Public Land Management Act of 2009. PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to manage and protect paleontological resources on Federal land using scientific principles and expertise. The Secretary shall develop appropriate plans for inventory, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies. These plans shall emphasize interagency coordination and collaborative efforts where possible with non-Federal partners, the scientific community, and the general public. National Park Service Mission Statement: "The National Park Service is dedicated to conserving unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."4 Constructing a large industrial-scale transmission line through any part of Tule Springs Fossil Beds National Monument would be inconsistent with the mission on the National Park Service. Potential impacts on paleontological resources resulting from construction of the proposed Project primarily would involve terrain modification and road building. Paleontological resources may be significantly impacted, including an undetermined number of fossil remains and unrecorded fossil sites; associated specimen data and corresponding geologic and geographic site data. Direct impacts could result from vegetation clearing, grading, widening of road cuts, and any other earth-moving activity that disturb or bury previously undisturbed fossiliferous sediments, making those sediments and their paleontological resources unavailable for future scientific investigation. The Pleistocene fossil beds here are a very significant resource and some of the richest Ice Age faunas in the Southwest. There is no way to mitigate the destruction of these rare fossils, and save the associated information associated with them: placement, sediments, microfossils, and other geological and taphonomic data that need to be preserved intact for their high value. Punching deep holes to lay foundations for giant transmission towers would results in destruction of significant and irreplaceable paleontological resources.
19.JB-4	The transmission line will destroy so much of Nevada's wide open and unindustrialized public lands. By opening huge tracts of undisturbed desert lands to industrialization, as the true purpose of this proposed project really is, the health of all Nevadans will be impacted. Drive through lvanpah Valley on a windy day to witness the unrelenting dust storms resulting from so much desert being bladed and/or disturbed to install solar PV panels. If not convinced, go to Boulder City and see the massive solar developments there, as well as the massive dust storms in Eldorado Valley. The dust is anything but harmless. People throughout Clark County are now having their health impacted by all of the particulate in the air on a windy day. The Eldorado Valley dust storms also carry the spores of Valley Fever (coccidioidomycosis, a fungal lung infection), plus naturally occurring asbestos which causes mesothelioma cancer. Still not convinced: Drive northeast of Las Vegas to the Apex Area, where thousands of acres of land are disturbed for even more solar projects. Check back with the Moapa Piute Tribe in a few years. The health issues from all the dust will no doubt be just as deadly, or even more deadly, than the former methods of generation in the area. Fast forward a few more years, when the massive battery banks necessary to store the solar power for when it is needed on the grid, start catching on fire. The smoke from battery fires is even more deadly than the dust. Plus, much of the power generated by the PV panels will be needed to cool the massive battery banks, which over-heat even in much cooler areas of the California coastline. If even one-half of the planned 230 square miles of solar projects proposed on public lands between Las Vegas and Reno are built, the entire region will be subject to massive dust storms and the resu lting health issues.
21.JGL-5	It appears that the Beatty Wash could be made into a main access road for construction. The BLM and community moved annual high-speed races out of the Beatty Wash due to its impact to the Wash, the archaeological sites and petroglyph panels along it. If existing or new roads are to be improved and widened, they will cause irreputable damage to the desert floor, and would take a hundred years or more for nature to repair itself.
22.KE-1	Will the line construction destroy fossils?

CID	Geology, Soils, and Paleontology Comments/Statements
24.KB-7	The Tule Springs Fossil Beds provide "refugia" (Last Stand) habitat for wildlife, and keep wetlands and groundwater systems functioning. They contain archeological and paleontological sites, protected for decades, by Tribal authorities and individual researchers, waiting for future less-destructive, more effective technology, with which to access and read the fossil record, and study past seasons in a rechargeable environment. Not a place to send in heavy equipment, to build (increasingly unnecessary) utility scale industrial infrastructure.
31.MG-2	I'm quite concerned about the -- in general, about a very specific issue, and that are the biological soil crusts that re found. And these -- they do many functions. Hold the soil in place, transfer nitrogen to thesoil and plants. But they sequester carbon. And there needs to be very careful and detailed analysis about what's there right now. And not in terms of deciding here to locate the whole project itself, but we have to know in detail what the -- biological 6 soil crusts out there. I took a BLM -- I wasn't a BLM member, but I took a biological soil crust in Nevada, or in Las Vegas about eight or nine years ago, which was put on by Bureau of Land Management. And they had Roger Rosentreter were there, who is a retired BLM for Idaho. And his cause is -- that there -- a number of BLM people there, has to do with the fact that you can manage the range to be consistent but not disturbing biological soil crust. But you can't -- but we didn't go into it then, but there's serious problems with -- as we can see from the developments already. Solar, disturbing the biological soil crusts. So that needs immediate attention, I think things that go into designing the route in the first place. Thank you for my getting here. Glad to have this opportunity.
33.LM-1	Please reject the Greenlink West Project. Not only will it use not-green fossil fuels, but it will destroy and/or damage precious, irreplaceable habitat, wildlife, native flora, fossils, and archeological/cultural sites.
35.KE-1	Does the BLM know how driving those poles in the ground can avoid damaging fossils protected in the monument? Has everything ben surveyed under the ground for these alternatives?
35.MC-1	I am writing to ask that BLM please reject the application for the Greenlink West Transmission Project (DOI-BLM-NV-0000-2022-0004-EIS) for the following reasons: The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
35.MC-14	Because of these many impacts to biological, cultural, paleontological, archaeological, water, and visual resources the Greenlink West Transmission Project should be rejected.
40.MM-7	In recent decades, geologic studies of dust have made significant advances in understanding the desert soils and their ability to store carbon and dust. I see little indication that that state of the science is considered in expansive plans to develop the desert. The ancient soils that mantJe the desert landscape store l00O's of years of dust that is released when the soils are disturbed. Soil forming processes in Nevada's desert lock carbon dioxide in mineral deposits that form in the soil. Wide-scale disruption of desert soils break down the carbon fixing processes and release stored carbon. If Greenlink and the connected developments are intended to be "green" the full carbon budget needs to be addressed quantitatively. Dust released by areally extensive developments is major risk for regional air quality. Green link and the connected developments risk destroying one of the few remaining areas with good air quality. Dust emissions are also a health hazard. Desert soils have been shown to contain harmful elements like arsenic that can distributed by the wind once they are released by disturbance. Similarly the dust may contain harmful minerals like naturally occurring asbestos, which is found in many of the areas for proposed development, and harmful organism like the soil fungi that cause valley fever. Windblown dust from poorly sited developments in desert soils have become notorious hazards resulting numerous highway fatalities in Texas, Arizona, and California.
47.RR-2	There is a 3-5 year NEPA process for the National Park Service to consider a permit request for NV Energy to put lines on the Monument. The damage to paleontological resources in the Monument is not just the pole itself but the base of the pole which is placed more than 20 feet deep and spreads out horizontally almost 50 feet underneath the surface. The damage to fossil sites would be irreparable.
47.RR-4	The line will be built inside the border of the Tule Springs Fossil Beds National Monument and will impact Ice Age fossils and visual resources.
53.WB-3	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area. NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11).
66.HG-3	This valley should be preserved as a geologic landmark. It is one of the most geologically diverse areas I have encountered in my 35-year career as a geologist in southern Nevada. A Key Observation Point is the crest of Yucca Mountain. Most tours of Yucca Mountain end up there. Benches and a map stand were built. It is an important view for the purpose of geologic education. Many US senators have visited the viewpoint. Ancient native American hunting blinds were found on the Yucca Crest, attesting to the fact that this has been an important viewpoint for a long time.
66.HG-4	On the west side of Crater Flat, Bare Mountain's hundreds of millions of years' worth of multicolored strata tilt to the sky. On the east side the dramatic escarpment of Yucca Mountain exposes a history of violent pyroclastic flows and ash falls. To the north, Timber Mountain Caldera has been a designated National Natural Landmark since 1973, because of its geologic value.
66.HG-6	In the middle of Crater Flat lies a series of basaltic cinder cones of varying ages and erosional states. At the south end, Busted Butte presents a wonderful example of fault offset in the caprock with sand ramp draped flanks below. Great slide blocks of Paleozoic rocks overlie volcanic rocks millions of years younger on the southwest margins of Crater Flat. There is also very young faulting offsetting soils, as well as Pleistocene spring deposits from a time when water table was higher. This is a well-studied area geologically thanks to the Yucca Mountain project.
66.HG-7	Not only does the geology of Crater Flat make it unique, but the lack of human structures, other than a few dirt roads and old drill pads, exemplifies an increasingly rare scene in the desert southwest. The route through Crater Flat and into Tarantula Canyon is frequented by backcountry travellers.
66.HG-8	The desert southwest and Great Basin are areas of dramatic landscapes and well-exposed geology. These settings should be preserved as a geologic resource. Once ground is disturbed, it is very difficult, if not impossible, to restore desert soils and vegetation. The damage is essentially permanent.
70.RS-8	The project would be built within the boundary of the Tule Springs Fossil Beds National Monument. The project would seriously impact Ice Age fossils and visual resources. The preferred alternative would be located 5 feet outside of the designated Energy Corridor and disturb 50 feet into park land. Poles would be driven up to 30 feet in the ground and damage fossils in the area.
70.RS-9	NV Energy has not submitted a request to the National Park Service to place poles on park service land. Up to 3 years may be needed to study impacts to fossils, wildlife, cultural sites, etc. as required by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa I-11).
80.JCR-2	We have been an active part of the Protectors of Tule Springs for the past 6 years and appreciate that the Tule Springs Monument is protected from the housing sprawl that continues in our fair city. It is concerning that NV Energy is requesting more access to arrange for larger energy corridor. We believe this will damage the paleontological resources and do damage to the fossil sites which would be irreparable.

CID	Geology, Soils, and Paleontology Comments/Statements
81.CO-5	Tule Springs Fossil Beds NM encompasses one of the largest and most diverse late Pleistocene vertebrate fossil assemblages in the southern Great Basin and Mojave Deserts. The indigenous fauna of Tule Springs includes large mammals and other vertebrates, and the fossil assemblage dates from approximately 100,000 to 12,500 years ago. Invertebrates, plant microfossils, and pollen also are present in these deposits. The Las Vegas Formation that contains these fossils, though, dates to over 500,000 years ago and paleontological data from this area continue to contribute to new scientific discoveries. Issue: The proposed alignment of the Greenlink West Project would pass through fossiliferous deposits in the park as well as east and west of the park. These deposits contain known fossil sites particularly on adjacent Clark County land to the east of the NM. The construction of the transmission line, including 1.5 miles in the park, will have the potential to impact paleontological resources, including an undetermined number of fossil remains and unrecorded fossil sites; associated specimen data and corresponding geologic and geographic site data. Impacts could result from transmission tower foundations, roadbuilding, vegetation clearing, grading, widening of road cuts, and any other earth-moving activity that disturb or bury previously undisturbed fossiliferous sediments, making those sediments and their paleontological resources unavailable for future scientific investigation. Recommendation: The Nevada Potential Fossil Yield Classification (PFYC) for the proposed Greenlink West transmission line corridor in TUSK ranks the highest potential to find fossils, with a PFYC value of 5 (on a scale 1-5). In addition to archaeological, biological, and ongoing paleontological surface studies, the NPS requests the project proponent conduct ground penetrating radar (GPR) studies within the ROW corridor. The use of GPR could potentially detect any anomalies that could further inform the effect of subsurface fossils within the ROW corridor.

CID	General Environmental Effects and Impacts Comments/Statements
01.KE-10	It's going to result in connected actions that will result in huge solar projects. There's other power lines up there too.
01.WC-5	AGA is ready, willing and able to meet with BLM and Nevada Energy to review the RoW alignments and potential impacts to the AGA exploration projects in the Beatty District of southern Nevada, as well as to discuss how we can align our collective efforts for the greater benefit of the State of Nevada and its citizens. AGA looks forward to the scoping opportunities and NEPA meetings and will participate in the process.
08.JH-1	I've been informed that this EIS will only look at this transmission line corridor itself and not look at any of the connective actions of some 200 -- over 200 square miles of potential solar farms. It's my understanding that NEPA requires that you look at connected actions, aswell as the principal action. And I think in this -- in this case, any court would ask, what would a reasonable person say when looking at 200 and some square miles of proposed solar farms that would hook into this? Is that a connected action? And clearly it is. And if you don't pay attention to that, you'll be subject to lawsuits. And that will tie you up in time and cost money. So I would strongly suggest that you expand your EIS to actually look at the impact of all of the solar farms for which the BLM has received applications. I think that's critical to do that.
08.JH-5	And it needs to include all connected actions, and you've got a lot of them here with regard to all of these solar plants.
09.AR-1	The Los Angeles Department of Water and Power (LADWP) has reviewed the proposed Greenlink North Transmission Project (Project) from the Bureau of Land Management (BLM), on behalf of Nevada Power Company dba NV Energy. The Project proposed a 525kV transmission line infrastructure, associated substations, related facilities, and a short-term Right-of-Way for construction and staging on public lands. LADWP has concluded that the proposed Project by NV Energy will impact LADWP's Transmission Line Right-of-Way (TLRW) No. 36.
10.ELR-10	7. Connected Projects – Please include in your impacts analyses those foreseeable projects that would not occur but for this project. Too often analyses limit direct and indirect impacts to the physical disturbances at the bases of transmission poles or as the result of new access roads, for example, and report acreages for those obvious project-related losses. For this project, we ask that the DEIS divulge the full extent of impacts and report acreages of all tortoise habitats, including linkage habitats, that will be temporarily and permanently degraded/lost as the direct result of this project, including renewable energy development that is contingent upon completion of the transmission line. The EIS should include the time needed for degraded/lost habitats to return to pre-project conditions with respect to functions and values. Frequently temporal loss is not included in the analysis of impacts and therefore not considered in the development of appropriate mitigation to offset those impacts.
10.ELR-18	Cumulative Effects Analysis – In the cumulative effects analysis of the DEIS, please ensure that the Council on Environmental Quality's (CEQ) "Considering Cumulative Effects under the National Environmental Policy Act" (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, "Determining the cumulative environmental consequences of an action requires delineating the cause-and-effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects." The analysis "must describe the response of the resource to this environmental change." Cumulative impact analysis should "address the sustainability of resources, ecosystems, and human communities." For example, the DEIS should include data on the estimated number of acres of tortoise habitats and the numbers of tortoises that may be lost to growth-inducing impacts along the entire length of the alignment.
10.ELR-19 Part 1	These eight principles listed below: 1. Cumulative effects are caused by the aggregate of past, present, and reasonable future actions. The effects of a proposed action on a given resource, ecosystem, and human community, include the present and future effects added to the effects that have taken place in the past. Such cumulative effects must also be added to the effects (past, present, and future) caused by all other actions that affect the same resource. 2. Cumulative effects are the total effect, including both direct and indirect effects, on a given resource, ecosystem, and human community of all actions taken, no matter who (federal, non-federal, or private) has taken the actions. Individual effects from disparate activities may add up or interact to cause additional effects not apparent when looking at the individual effect at one time. The additional effects contributed by actions unrelated to the proposed action must be included in the analysis of cumulative effects. Desert Tortoise Council/Comments/Greenlink West Project.6-1-2022 8 3. Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected.Environmental effects are often evaluated from the perspective of the proposed action. Analyzing cumulative effects requires focusing on the resources, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects. 4. It is not practical to analyze the cumulative effects of an action on the universe; the list of environmental effects must focus on those that are truly meaningful. For cumulative effects analysis to help the decision maker and inform interested parties, it must be limited through scoping to effects that can be evaluated meaningfully. The boundaries for evaluating cumulative effects should be expanded to the point at which the resource is no longer affected significantly or the effects are no longer of interest to the affected parties.
10.ELR-19 Part 2	5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries. Resources are typically demarcated according to agency responsibilities, county lines, grazing allotments, or other administrative boundaries. Because natural and sociocultural resources are not usually so aligned, each political entity actually manages only a piece of the affected resource or ecosystem. Cumulative effects analysis on natural systems must use natural ecological boundaries and analysis of human communities must use actual sociocultural boundaries to ensure including all effects. 6. Cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects. Repeated actions may cause effects to build up through simple addition (more and more of the same type of effect), and the same or different actions may produce effects that interact to produce cumulative effects greater than the sum of the effects. 7. Cumulative effects may last for many years beyond the life of the action that caused the effects. Some actions cause damage lasting far longer than the life of the action itself (e.g., acid mine damage, radioactive waste contamination, species extinctions). Cumulative effects analysis needs to apply the best science and forecasting techniques to assess potential catastrophic consequences in the future. 8. Each affected resource, ecosystem, and human community must be analyzed in terms of its capacity to accommodate additional effects, based on its own time and space parameters. Analysts tend to think in terms of how the resource, ecosystem, and human community will be modified given the action's development needs. The most effective cumulative effects analysis focuses on what is needed to ensure long-term productivity or sustainability of the resource. We request that this analysis focus especially on numbers 3, 6, 7, and 8 for the Mojave desert tortoise.
11.AM-4 Part 1	On April 20, 2022, the Council on Environmental Quality issued a final rule2 to amend certain provisions of its regulations for implementing the National Environmental Policy Act including revising the definition of "effects" to include direct, indirect, and cumulative effects (40 CFR 1508.1(g)). Indirect effects or impacts, which are caused by the action, are later in time or farther removed in distance, but are still reasonably foreseeable, and may include growth inducing effects (40 CFR 1508.1(g)(2)). The CEQ considers the disclosure of all reasonably foreseeable direct, indirect, and cumulative effects to be critical to the informed decision-making process required by NEPA. In the Draft EIS, describe indirect and cumulative impacts associated with the Greenlink West Project and alternatives, as well as the methodology used to assess them. Cumulative impacts analyses are important as they describe the threats to resources as a whole, presented from the perspective of the resources instead of from the individual project. Understanding cumulative impacts can

CID	General Environmental Effects and Impacts Comments/Statements
11.AM-4 Part 2	For each resource analyzed, the Draft EIS should: • Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date. • Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. • Identify all on-going, planned, and reasonably foreseeable projects in the study area that may contribute to cumulative impacts. • Identify the future condition of the resource based on an analysis of impacts from reasonably foreseeable projects or actions added to existing conditions and current trends. • Assess with specific measures the contribution of the impact from each alternative to the long-term health of the resource. • Propose mitigation when cumulative impacts are identified for a resource. • Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. • Identify opportunities to avoid and minimize impacts, including working with other entities.
11.JM-2	We are very concerned about the proposed Greenlink route because it transects The Nature Conservancy's 7J nature preserve in Oasis Valley. The 7J nature preserve is a place of incredible ecological significance as it is the headwaters for one of the most biodiverse hot spots in the world, the Amargosa River. This is why for the past 40 years The Nature Conservancy has invested in conservation of the Amargosa River, beginning with our acquisitions of properties in and around Ash Meadows in the 70s and 80s, which were then transferred to the USFWS for management as a wildlife refuge. We subsequently have acquired property or worked to conserve land along the River. The 7J Nature Preserve is our most recent acquisition in this system, and a critical component of our conservation investment in Amargosa. We acquired the 7J Ranch on early 2019. The 7J was and is a working ranch with the former owner, Hank Brackenbury, still grazing cattle on the property and surrounding grazing allotments. TNC established a Conservation Innovation Center there (see attached a fact sheet). The ecological importance of the Amargosa has been acknowledged for decades and continues to be lauded as a hot spot for biodiversity. Last month, the Amargosa River was featured in National Geographic, which highlighted the importance of TNC's preserve at its headwaters (article linked and attached). The Amargosa is important locally too, evidenced by the recent honor from NV Dept. of Wildlife of the Wayne E. Kirch Conservation Award bestowed to Len Warren TNC's Amargosa Manager, for his work restoring and maintaining habitat in this spectacular place. The Nature Conservancy is deeply committed to conserving the Amargosa River.
12.ES-7	Cumulative impacts from both the transmission line and the (non-rooftop) industrial solar plants this will spawn must be analyzed in its entirety.
13.KE-14 Part 1	Please review the associated solar applications for Greenlink West as "Connected Actions". Under the Code of Federal Regulations, connected actions are actions that are directly a result of a specific proposed action. (1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification. 40 CFR § 1508.25 - Scope. | CFR | US Law | LII / Legal Information Institute (cornell.edu) According to BLM: Analysis of Connected Actions under the National Environmental Policy Act | Bureau of Land Management (blm.gov) (see BLM 2018) The following paragraphs revise BLM NEPA Handbook (H-1790-1) Section 6.5.2.1 (page numbers 45-48): Connected actions are those proposed Federal actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable. Because there are nearly 230 square miles of public lands solar energy applications associated with the Greenlink West Transmission Project, they are connected actions to the upcoming draft EIS. The Greenlink West Project would need to build three major substations designed to connect several thousand acres of large-scale solar on to the grid.
13.KE-14 Part 2	With a few exceptions, all the SF-299 applications for solar energy in the area say they must hook into the Amargosa, Esmeralda or Ft. Churchill Substations - all being built for the Greenlink West Transmission Project. These solar applications would not be pouring into the BLM offices if a large high-voltage new transmission project was not being actively proposed and reviewed. Otherwise, the remote basins have no transmission infrastructure capable of carrying any utility-scale solar generation to load centers. Each of these large-scale solar project applications will need an EIS and would not proceed unless Greenlink West is built. None of the Solar projects have made NEPA, but they are all submitted as SF-299 applications for the BLM. Nothing has been approved or really looked at in detail yet. According to the developers, they are all feasible because they meet the Variance requirements and could plug into the new transmission line. Since the line would have associated substations built with it, the projects are feasible to hook into it. We do not think they are feasible over the resource damage they would cause. Are the public lands solar projects not feasible but for the transmission project? Or are those projects already approved and will go in regardless of the transmission project? If it's the former it's a connected action. But the Purpose & Need statement itself doesn't determine whether projects are connected to the proposed action. BLM's NEPA handbook identifies the relevant factors, and there's nothing in that excerpt about Purpose & Need statements. The EIS should fully review all connected and cumulative impacts that would result from a Record of Decision issued to approve Greenlink West.
13.KE-15	The Biden Administration has revised the Trump Administration changes to the National Environmental Policy Act. It went into effect on 5-20-2022. Cumulative impacts must now be fully reviewed again. The National Environmental Policy Act (NEPA) requires federal agencies to analyze the direct, indirect, and cumulative environmental impacts of actions that are proposed on public lands. Clearly, 230 square miles of solar applications associated with the Greenlink West Project are cumulative impacts. For the Greenlink West Draft EIS, BLM should review public land impacts, endangered species impacts, archeological impacts, environmental justice impacts all associated with these large-scale solar applications. It is probable that BLM ignored this issue because the rule was only recently revised. BLM is required to do this now.
13.KE-5	During BLM meetings we raised the concerns about the many proposed utility-scale solar applications needing to be reviewed as connected actions to the Greenlink proposal. More on this below.

CID	General Environmental Effects and Impacts Comments/Statements
13.PG-14	We respectfully request the BLM evaluate the indirect impacts of new solar energy development near the proposed Greenlink West substations. We also encourage the BLM and NV Energy to coordinate with the Nevada Department of Transportation and Federal Highway Administration and disclose the proposed Interstate 11 transportation route alignment relative to the Greenlink West. Co-locating these major linear disturbances would achieve smart from the start planning principles by avoiding unnecessary duplicative linear disturbances and would be consistent with Section 503 of the Federal Land Policy and Management Act of 1976, which directs federal agencies to designate right-of-way corridors to "minimize adverse environmental impacts and the proliferation of separate rights-of-way…" It is our understanding that the Greenlink West EIS will include resource management plan amendments to essentially create a new corridor that will follow the approved Greenlink West alignment. This seems to contradict the intent of a utility corridor, which is a planning-level designation and should guide the placement of future projects, not the inverse.
13.PG-15	The Greenlink West project is one piece of an unprecedented statewide energy boom. Past, present, and reasonably foreseeable projects are contributing to the decarbonization of the state's energy system. Cumulatively, these projects will also compromise important conservation values if not considered holistically and relative to other larger-scale factors, such as wildlife migration corridors. Consistent with recent Council on Environmental Quality guidance for evaluating cumulative impacts, we ask the BLM to conduct a thorough evaluation of the Greenlink West project relative to the myriad of existing and planned large-scale energy and infrastructure projects on BLM-administered lands throughout the state. Such an analysis is critical for fully disclosing the environmental consequences of this project.
13.PG-4	The magnitude of the Greenlink West project is such that regardless of the final alignment, it will result in unavoidable direct, indirect, and cumulative impacts on the environment. Many of these impacts can be minimized or mitigated through smart from the start siting, project design measures, and a plan for programmatically addressing the future siting of new renewable energy projects.
16.KE-3	Finally, the solar project applications associated with this project are big, and we know that the project won't be built out to the full extent of the application. But if they're half the size of those applications, they're going to be 3- to 4,000 acres apiece. Many of them are south of Beatty. Some of themare near Amargosa Valley. And we had a little bit of debate last night whether or not the review for the power line that talks about that would be called connected action. I looked it up today, and I think the draft EIS should at least talk about the impact. Because all of the applications mention Greenlink and they mention the substation, and they essentially couldn't happen without it. There's just a couple of other applications that have other power lines. And so this EIS really does open up Pandora's box of all of these projects that could really damage the economy of the town if they're built in the distance and the close proximity that some of these applicants want them. And because they don't have any other options, it's legal to do that. I've seen the BLM do that. There was a private land storage hydro project, and they actually reviewed the impact of the power lines. But they also talked about how much water it would use, and that was other agencies' jurisdictions. But I think because there is so much land being speculated for -- from these solar applications, that the impact would be irreversible and very negative to the community, because they just don't give back to the community. They should be thoroughly reviewed in this environmental impact statement.
23.JH-2	This project is a very large and expensive project with many large scale impacts. In order to understand the magnitude of the impacts it is imperative that all the connected actions be included in the analysis of the environmental impacts. The gross area of connected actions (the solar farms and associated transmission lines) exceeds the area of disturbance of the Greenlink Line itself by at least an order of magnitude so it has to be included in the EIS.
23.PD-6	So, is there going to be some sort of connected action analysis beyond just the cumulative impacts? Is this going to be part of the decision-making on Greenlink?
27.KB-15	Indirect and cumulative effects of projects, proposed and future, along all 3 powerlines must not be split from the NEPA evaluation of a single powerline route. Each individual decision affects the future of our NV public lands landscapes, wildlife and multiple uses, but without considering the whole, no assessment of the magnitude of cost to NV into the future can accurately be made. Nor can impacts to NV 30x30 climate goals by above proposals be separated from the NEPA consideration of either. The current process is a "cart before the horse" proposition.
27.KB-18	The aggregate of NV BHA concerns: disassociation of the NEPA study of the proposed Greenlink West transmission line from the other 2 trans-NV power lines, one proposed and one in existence, additionally disassociated from the current and projected projects along those lines, 2 of which have not even been through the NEPA process to make an informed siting decision, commits a most grave error in setting the future fate of our NV Public Lands. Essential missing elements: the time to acquire the science-based pivotal information required for deliberative, wise decision-making owed to we the owners of those lands, the wildlife whose lives depend upon them and the multiple use opportunities they provide, inclusive of tourism. In turn, a transparent process should provide to the public all information required to make informed comments. This should include: 1.)Date re indirect & cumulative effects from the 3 transmission lines and associated energy & minerals projects inclusive of existing, proposed and projected. Potential loss to 30x30 aspirational goals must be folded into any final decisions. 2.)Data re the amount of energy NV needs well into the future, how much energy the proposed and existing 3 lines will provide, how much energy will be excess and where does it go. 3.)Data re how much maximum energy could be produced at the sources of where it is consumed (distributed) if all potential sites were utilized (i.e. parking lots, rooftops...). The public deserves to know how much of our public lands need be contributed to large scale projects if all other avenues of production are facilitated, incentivized and built with the same sense of urgency and speed as fast-tracked public land energy related proposals. We fully recognize we need both, while submitting that focus should be on maximizing distributed sources first before dedicating public lands whose current resources are finite and non-replaceable. 4.)Crucially needed is a statewide assessment, conducted by a co-operative state and federal agency process to plan for a NV future that maximizes efficient renewable energy production, while minimizing loss of 30x30 goals, multiple uses, public land resources productivity and wildlife viability into the foreseeable future.

CID	General Environmental Effects and Impacts Comments/Statements
27.KB-9	NEPA process design: 1) NV BHA supports: a.) A process that includes, at minimum, the evaluation of indirect & cumulative effects of the route itself, the location of sub-stations and the projected related projects already and/or likely to be along the proposed route. We question the irresponsibility, if not legality, of NOT doing so. b.) (As per item A. 5.) A process that simultaneously evaluates indirect & cumulative effects of Greenlink West, North and the existing East line. c.) Potential loss to 30x30 goals be analyzed concurrently. d.) (as per item b above & A.5) Such an analysis would best be conducted within a RMP process, inclusive of wildlife/flyway corridors, prioritized least impactful "opportunity zones", along with incentives to use them and disincentives for development outside such zones. 2) The "cart before the horse" process: We are concerned that many renewable energy & mineral exploration or expansion proposals are being submitted at an increasing rate to both BLM & NDOW along the proposed corridors of both W & N Greenlink before the NEPA process has begun and long before any final route decisions will be made. Developers are posing questions that require cost of the time and energy of NDOW & BLM employees. This presents the grave danger of permanent negative impacts to our public lands before any restrictions related to avoid, minimize, mitigate can be applied to the current Greenlink proposals. This is entirely and dangerously backward. (See section A. 4 & 5 above) Again, 30x30 goals cannot be disassociated from development proposals.
30.MM-2	And the case was made earlier that those actions, those proposed power plants, can't be considered in light of this transmission line. And I think that's problematic because these are hand in glove. There would be no point in building renewable energy facilities out in these areas, in these remote areas like Sarcobatus Flat or the Spector Hills, a couple of examples. Were it not for Greenlink. And I -- one of my questions is, does Greenlink have a purpose if we don't build those, we don't ultimately build those? Because of their environmental costs, which are, I think, considerable. So did a little research and I came up with this item out of BLM's NEPA handbook. In section 6.5.2.1, pages 45 to 48, I found the following paragraph. And I won't read the whole thing, but it says, proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement, cannot or will not proceed unless the other actions are taken previously or simultaneously. Or if the actions are interdependent parts of a larger action and on the larger actions for the justification. It goes on to say that federal actions that are not currently proposed, i.e., ripe for decision, can't be considered connected actions. But it closes that section by saying, actions that are not yet proposed and are not connected actions, but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable. All right. So we've got hand in glove going here. You're talking about building this corridor, but it goes along with hundreds of thousands of acres of large scale solar power plants. And those will have tremendous impact. As a geologist, my particular interest is in dust. And I see -- running out of time, but I see a couple of really big problems.
40.MM-2	The connected facilities will generate energy far in excess of Nevada's needs, with the excess power intended for sale on the energy grid at market prices. Greenlink is a subsidized connection between corporate power generating facilities and distant cities that will consume most of the power generated in Nevada's open spaces. Few of the profits generated by these solar developments will remain in Nevada while Nevada's rate payers will foot the bill for overbuilt power grid. As it is, existing solar power facilities in the region have been unable operate at profit.
40.MM-4	In previous meetings with BLM there has been an attempt to separate the Greenlink development for solar developments that might be constructed because of Greenlink' s transmission capacity. BLM's own NEPA regulations require that these developments be considered together because they are Connected as defined by: The following paragraphs revise BLM NEPA Handbook (H-1790-1) Section 6.5.2.1 (page numbers 45-48): Connected actions are those proposed Federal actions that are "closely related" and "should be discussed" In the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental Impact statement; cannot or will not proceed unless other actions are taken erev1ously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions but may need to IJe a ed In the cumuative effects analysis If they are reasonably foreseeable.
52.SN-10	Finally, we could not find any studies on or opportunities for public comment on the "Esmeralda SEZ." Three of the project descriptions for the "Esmeralda SEZ" default to the October 2012 Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States, which state that the project sites are located within a variance area for solar power generation under the document. Although 43 CFR Parts 2800 and 2880 allows for variance areas on a case-by-case basis, each case requires planning to designate particular SEZ sites. For the "Esmeralda SEZ," the BLM/Greenlink is obliged to analyze the impacts of the proposal and describe why the Greenlink Transmission corridor is bypassing and not utilizing the Millers SEZ and instead is developing the new Esmeralda SEZ. When asked whether or not the EIS for the Greenlink Power Transmission line should include the proposed new SEZs along the transmission route, Greg Helseth replied that it should not be considered at this time, because the transmission corridor and the proposed SEZs are not linked actions. He said that the Greenlink West Transmission line has planned substations in locations of two substantial proposed SEZs (Esmeralda SEZ-total 61,463 acres of public lands; Sarcobatus SEZ-total 10,000 acres of public lands). These SEZs would not be developed without the transmission line and the placement of the substations at the proposed SEZ locations. Clearly, the Greenlink Transmission Line will enable these SEZs to be developed and the SEZs should be considered connected actions to the transmission line. Every applicant for these SEZs lists the Greenlink West Transmission system and planned Substations as necessary for completion of their projects within their Project Descriptions (Sawtooth Energy Center; Esmeralda Solar Project; Smoky Valley Solar; Gold Dust Solar; NVLOC Solar Energy; and Rhyolite Ridge Solar 1 & 2). The Greenlink Transmission Line and substations, and the proposed solar developments are connected actions, and their combined cumulative impacts must be evaluated within the same EIS. This is especially critical since the BLM's land management planning documents are decades out of date. FNW REQUEST: Analyze the cumulative impacts, past, present, and future, of the Greenlink project and all other solar energy projects in the state of Nevada.
64.KF-3	Here is a BLM IM explaining defining connections actions under NEPA. https://www.blm.gov/policy/pim-2018-023.
64.KF-5	Greg, you mentioned cumulative impacts. Can you or David Pritchett confirm that the Greenlink West EIS will include cumulative impacts analysis? I'm asking because Western Watersheds Project has seen some BLM Nevada NEPA documents in the last year that didn't have cumulative impacts analysis.
64.KF-6	David, thank you for answering my question. How is a "Foreseeable Effects" section different from a "Cumulative Effects" section? Are they identical or would there be subtle differences?
68.JK-11	The Department encourages the BLM to include issue of increased energy development and potential need for additional power transmission within the EIS, as well as to acknowledge potential solar facilities as connected actions associated with the Greenlink West Transmission project. It is critical that the inclusion of all cumulative, or reasonably foreseeable future actions be analyzed and addressed appropriately for more meaningful public disclosure and participation.

CID	General Environmental Effects and Impacts Comments/Statements
68.JK-12	The Department encourages the BLM to include issue of increased energy development and potential need for additional power transmission within the EIS, as well as to acknowledge potential solar facilities as connected actions associated with the Greenlink West Transmission project. It is critical that the inclusion of all cumulative, or reasonably foreseeable future actions be analyzed and addressed appropriately for more meaningful public disclosure and participation.
68.JK-7	In all, we recommend assessing potential impacts to these species based on baseline surveys for the project and by providing meaningful avoidance and minimization measures.
72.EG-2	Does Greenlink and the coming I-11 impact each other?
72.TD-5	These proposed developments appear to also be connected actions and should be analyzed in this process.
74.PG-15	Connected Actions and Cumulative Impacts - The Greenlink West transmission line and two new substations will make new renewable energy development, particularly large utility-scale solar projects, economically and technologically feasible. Pursuant to 40 CFR 1508.25, the scope of an EIS should consider connected actions, which are those closely related to the proposed action because they are triggered by the proposed action, cannot or would not proceed without the proposed action, or are an independent part of a larger action and depend on the larger action for justification. Without the Greenlink West project, the likelihood for new large-scale solar projects along the proposed line route would be much less. Similarly, the final Greenlink West alignment and associated utility corridor is likely to influence the alignment of future energy and infrastructure projects, such as the planned Interstate 11 transportation route.
74.PG-17	We also encourage the BLM and NV Energy to coordinate with the Nevada Department of Transportation and Federal Highway Administration to better understand and disclose the potential alignment of the Interstate 11 transportation route relative to Greenlink West. In addition to disclosing and analyzing the Interstate 11 project as a reasonably foreseeable future action in the cumulative effects section of the EIS, there is an opportunity for co-locating these major linear disturbances. This would avoid unnecessary duplicative linear disturbances and would be consistent with Section 503 of the Federal Land Policy and Management Act of 1976, which directs federal agencies to designate right-of-way corridors to "minimize adverse environmental impacts and the proliferation of separate rights-of-way…" Because the Greenlink West EIS and Record of Decision would include a resource management plan (RMP) amendment to relocate the existing utility corridor, the corridor alignment and width should be able to accommodate Interstate 11.
74.PG-20	We appreciate the BLM's consideration of these comments, and we hope they contribute to a draft EIS that evaluates smart-from-the-start alternatives, fully discloses the indirect and cumulative impacts of the project, and is supported by updated RMPs.
77.TA-10	Additionally, cumulative impacts to GrSG and habitat require analysis in this EIS and potential RMP amendments. Please include appropriate science-based analysis.
77.TA-4	This Action EIS must consider cumulative environmental impacts from BLM proposed actions which affect the quality of identical and adjacent environmental and habitat areas.
77.TA-5	The following comments pertain to obligatory data for a meaningful BLM EIS for the proposed Action. Cumulative impacts from ongoing and proposed BLM actions within Nevada require assessment within this EIS.
81.CO-16	The Greenlink West Project has a high associated probability of presenting opportunities for the siting of renewable energy along its proposed corridor. To date, the BLM has received seven new utility-scale solar project applications near the proposed Esmeralda substation north of Death Valley NP. In the Amargosa Valley adjacent to the park, the BLM has received at least fourteen applications for new utility-scale solar projects that would connect to the proposed Amargosa substation. To address this recent influx of interest in the Amargosa Valley, the BLM is preparing to offer three competitive parcels, including the Amargosa Solar Energy Zone, for leasing in the coming months. Issue: The NPS is concerned about cumulative effects to the shared landscape and NPS resources surrounding Death Valley NP from solar development proposals associated with the Greenlink West Project. In addition, a number of gold and lithium mining operations to support renewable energy development are also being proposed in the same landscape. Cumulatively, these solar facilities and mining operations could further impact the scenic viewshed of iconic peaks, wilderness areas and other significant features at the park (i.e., Titus Canyon). Water use for both construction and operation of solar installations and mining operations may strain already overallocated groundwater basins. Any water withdrawals that may affect Devil's Hole and the federally endangered Devil's Hole pupfish are of particular concern. The development of multiple large-scale solar facilities and mining operations can interfere with migratory movements or movements of animals into new ranges. These connected and reasonably foreseeable future actions should be considered in the evaluation of the project. Recommendation: The NPS recommends that the BLM consider lands surrounding Death Valley NP to analyze the cumulative impacts of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, to NPS resources and values such as scenic views and groundwater quantity. The quantity of proposed utility-scale solar projects to connect to the Greenlink West Project would be situated in areas with a high potential for resource conflict with park resources and values (2012 Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (FES 12-24; DOE/EIS-0403)).
81.CO-17	The NPS serves as a NEPA Cooperating Agency for the Greenlink West Project and looks forward to effective collaboration and cooperation with the BLM. Issue: The Federal Register Notice initiating the scoping process for this project was published on April 29, 2022. Recent changes to federal NEPA regulations took effect May 20, 2022. The "Phase One" final rule reinstated three key provisions to (1) Purpose and Need, (2) Agency NEPA Procedures, and (3) Definition of "Effects" or "Impacts". Recommendation: The NPS recommends that the BLM clarify how Phase I final rule may be incorporated into the NEPA process for the Greenlink West project. The NPS supports a redefinition of the Purpose and Need according to the revised regulations, to consider the BLM's purpose and need and range of reasonable alternatives, particularly around Tule Springs Fossil Beds NM. A robust and comprehensive analysis and discussion on the Cumulative Effects of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, particularly around Death Valley NP, should also be included in the EIS. Overall, due to the level of development interest (i.e., solar, transmission, gold and lithium mining) in the Amargosa Valley, the NPS recommends the BLM collaborate with other agencies and partners on landscape level analysis and planning of the Nevada desert to identify areas most appropriate for development and to minimize impacts to sensitive resources.

CID	Native American Tribal Issues Comments/Statements
01.KE-2	The other thing is we have got an alternative that goes over -- right over Bailey's Hot Springs. And it's not only near where people live, but it's the Shoshone consider that a culture [inaudible]. You guys are not talking to people. And if you are, you're not telling us you're talking to those people.
02.AGA-18	The BLM will seek coordination and consistency with other government programs including Tribal plans and policies. AGA's Comments: • AGA supports the coordination and consultation with area Tribes. • AGA is pleased that area tribes including the Timbisha Shoshone and Yomba Shoshone Tribes are cooperating agencies in the preparation of the EIS document.
11.AM-20	Executive Order 13175 on Consultation and Coordination with Indian Tribal Governments (November 6, 2000) was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian Tribes. On November 5, 2009, the Presidential Memorandum on Tribal Consultation was issued and required each agency to prepare and periodically update a detailed plan of action to implement the directive of EO 13175. On January 26, 2021, the Biden Administration committed to strengthening the relationship between the Federal Government and Tribal Nations and to advancing equity for Native Americans. The EPA is aware that the BLM is engaged in consultation with Tribal communities potentially affected by the proposed Greenlink West Project. In the Draft EIS, discuss the status of government-to-government consultation and identify issues or concerns that were raised, how those issues were addressed, and what additional or continuing consultations may be warranted. Identify resources of cultural and religious significance to each Tribal community and ensure that treaty rights and privileges are addressed appropriately. The EPA supports BLM's continued efforts to develop the NEPA document, as appropriate, in consultation with all affected Tribal governments, consistent with EO 13175. As a general resource, we recommend the document Tribal Consultation: Best Practices in Historic Preservation, published by the National Association of Tribal Historic Preservation Officers. On November 15, 2021, a Presidential Memorandum on Indigenous Traditional Ecological Knowledge and Federal Decision Making directed federal agencies to develop robust plans for ensuring meaningful Tribal consultation on agency work that may affect Tribal Nations and the people they represent. To the extent appropriate, solicit and elevate Indigenous Traditional Ecological Knowledge into the Tribal consultation process to better inform decision-making.
57.KD-4	In a personal opinion, in reading the Nevada energy proposal, I see nothing but a lot of flowery words! This powerline will not benefit Nevada residents whatsoever, only NV Energy and their ambitions. The BLM needs to consider this when it impacts our Indian tribal land. Will it disturb their ancestors and sacred ground?

CID	General EIS Comments/Statements
08.JH-7	So all of that stuff needs to be included in the EIS, or else you haven't really done your job on that. And you'll be subject to failure in courts when you're sued over that stuff. So I would suggest, if you want to go fast on this project, go slow, do the job right.
11.AM-23	Other Considerations for NEPA Review – Access to Technical Reports: The EPA recommends that all technical reports that lead to conclusions regarding environmental consequences be included as appendices to the Draft EIS available through at the BLM National NEPA Register website. Providing technical documents in the appendices as well as requisite summary information helps to ensure a comprehensive report with data easily accessible to reviewers, the public and the decision maker while keeping the EIS succinct and in accordance with guidance found in the CEQ's NEPA Implementing Regulations (September 2020).
13.PG-18	We appreciate the degree to which the agency has provided opportunities for input and comment throughout this process thus far. We look forward to continuing to work with the BLM in pursuit of smart from the start principles and an EIS that fully discloses the direct, indirect, and cumulative impacts of the Greenlink West project.
13.PG-2	We want to thank the Bureau of Land Management (BLM) for hosting a series of informational sessions about the proposed Greenlink West transmission line project and sharing preliminary data to help us understand the locations of proposed project features. This early engagement with interested parties and the public is the foundation of a sound National Environmental Policy Act process. We look forward to working closely with the BLM to help inform the environmental impact statement (EIS).
13.PG-5	We ask that the BLM evaluate a range of alternatives that would avoid, minimize, and mitigate specific environmental impacts; fully disclose the project's direct, indirect, and cumulative impacts in the EIS; and work collaboratively within the agency to integrate this project with broader planning-level initiatives.
22.KE-9	In previous meetings, you stated issues with Native Americans have been worked out. I actually have been talking to some folks and some of them haven't even been talked to yet. I am just wondering about realistic timelines if you actually want this completed by 2026. I think you guys are being completely unrealistic.
23.PD-1	What are the authorities by which BLM would authorize power lines on NPS land? Would it require NPS agreement/sign-off? Would it be one ROD signed by the Secretary?
26.PG-5	So regarding the NEPA process, as intended, Greenlink West is really proving to be a catalyst for new renewable energy developed interest, particularly adjacent to those two substations. We just urge the BLM to closely evaluate the full environmental impacts of the lines, specifically recognizing the cumulative and indirect effects of those projects near the substations. And to also coordinate closely, and it sounds like, since David Pritchard is here, coordinate with the planning team at the BLM on those corridors. So we look forward to continuing to work with the BLM and seeing those smart from the start principles come into play.
27.KB-15	Indirect and cumulative effects of projects, proposed and future, along all 3 powerlines must not be split from the NEPA evaluation of a single powerline route. Each individual decision affects the future of our NV public lands landscapes, wildlife and multiple uses, but without considering the whole, no assessment of the magnitude of cost to NV into the future can accurately be made. Nor can impacts to NV 30x30 climate goals by above proposals be separated from the NEPA consideration of either. The current process is a "cart before the horse" proposition.
27.KB-18	The aggregate of NV BHA concerns: disassociation of the NEPA study of the proposed Greenlink West transmission line from the other 2 trans-NV power lines, one proposed and one in existence, additionally disassociated from the current and projected projects along those lines, 2 of which have not even been through the NEPA process to make an informed siting decision, commits a most grave error in setting the future fate of our NV Public Lands. Essential missing elements: the time to acquire the science-based pivotal information required for deliberative, wise decision-making owed to we the owners of those lands, the wildlife whose lives depend upon them and the multiple use opportunities they provide, inclusive of tourism. In turn, a transparent process should provide to the public all information required to make informed comments. This should include: 1.)Date re indirect & cumulative effects from the 3 transmission lines and associated energy & minerals projects inclusive of existing, proposed and projected. Potential loss to 30x30 aspirational goals must be folded into any final decisions. 2.)Data re the amount of energy NV needs well into the future, how much energy the proposed and existing 3 lines will provide, how much energy will be excess and where does it go. 3.)Data re how much maximum energy could be produced at the sources of where it is consumed (distributed) if all potential sites were utilized (i.e. parking lots, rooftops...). The public deserves to know how much of our public lands need be contributed to large scale projects if all other avenues of production are facilitated, incentivized and built with the same sense of urgency and speed as fast-tracked public land energy related proposals. We fully recognize we need both, while submitting that focus should be on maximizing distributed sources first before dedicating public lands whose current resources are finite and non-replaceable. 4.)Crucially needed is a statewide assessment, conducted by a co-operative state and federal agency process to plan for a NV future that maximizes efficient renewable energy production, while minimizing loss of 30x30 goals, multiple uses, public land resources productivity and wildlife viability into the foreseeable future.
27.KB-2	We are aware that this proposal, maps and related energy & mining projects, have been public knowledge for at least 6 months, along with the Greenlink North proposal. It is hard to avoid thinking that some of the details of both proposals, and attendant developments, are currently evolving from "proposed" to, at best, a "close to assured" certainty. We are alarmingly aware there is no legal handle to push the pause button on all energy/mining proposals related to the proposed Greenlink W & N routes. If Nevada, the public land state, was enabled to be proactively visionary re the maximum cost/benefit to be gained from climate-related actions, inclusive of local distributive energy projects, the state & BLM would work in concert to push pause, until time could be taken to wisely consider and complete the NEPA process decision of the most cost/effective routes, inclusive of indirect and cumulative effects.

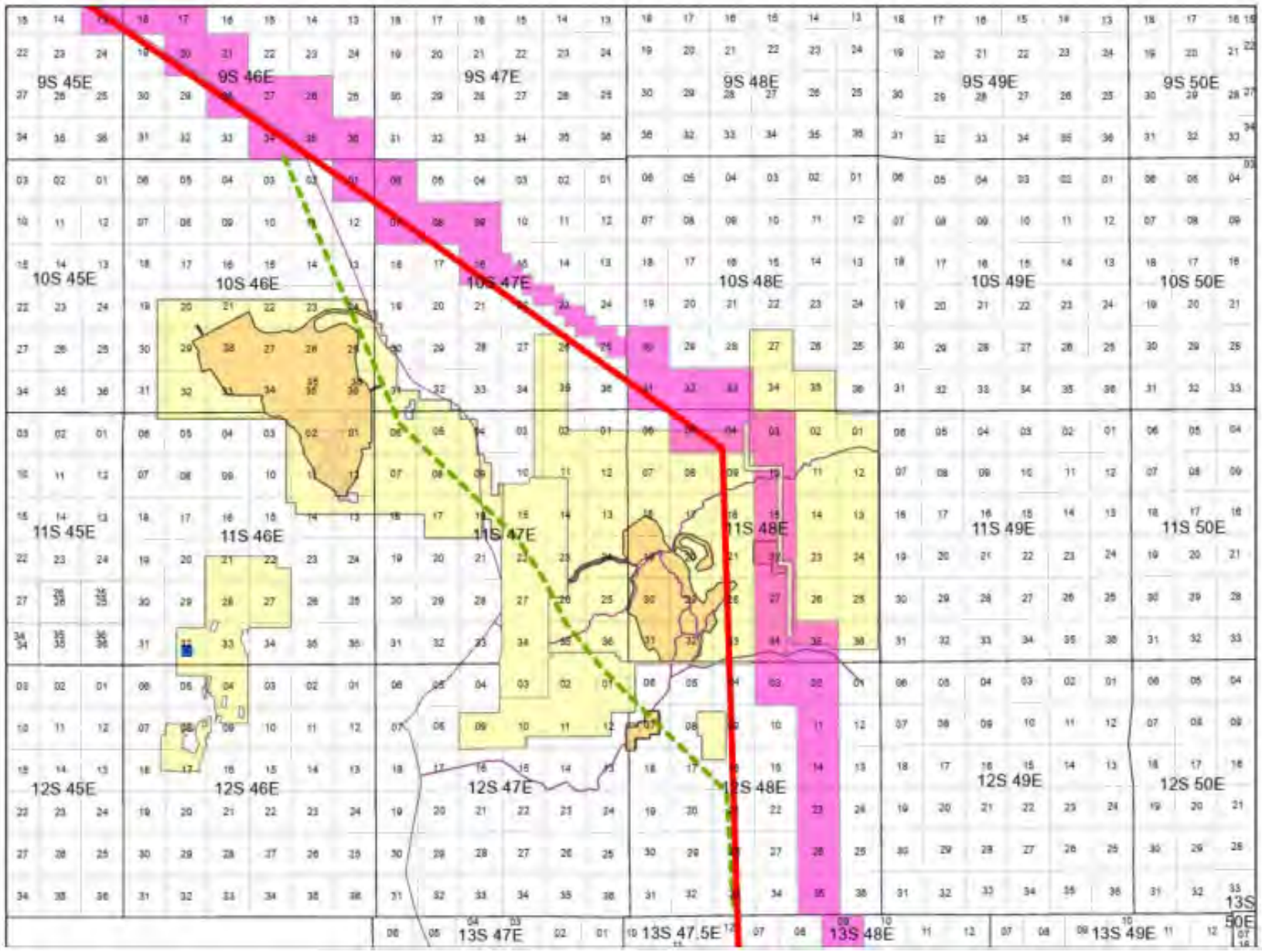
CID	General EIS Comments/Statements
27.KB-9	NEPA process design: 1) NV BHA supports: a.) A process that includes, at minimum, the evaluation of indirect & cumulative effects of the route itself, the location of sub-stations and the projected related projects already and/or likely to be along the proposed route. We question the irresponsibility, if not legality, of NOT doing so. b.) (As per item A. 5.) A process that simultaneously evaluates indirect & cumulative effects of Greenlink West, North and the existing East line. c.) Potential loss to 30x30 goals be analyzed concurrently. d.) (as per item b above & A.5) Such an analysis would best be conducted within a RMP process, inclusive of wildlife/flyway corridors, prioritized least impactful "opportunity zones", along with incentives to use them and disincentives for development outside such zones. 2) The "cart before the horse" process: We are concerned that many renewable energy & mineral exploration or expansion proposals are being submitted at an increasing rate to both BLM & NDOW along the proposed corridors of both W & N Greenlink before the NEPA process has begun and long before any final route decisions will be made. Developers are posing questions that require cost of the time and energy of NDOW & BLM employees. This presents the grave danger of permanent negative impacts to our public lands before any restrictions related to avoid, minimize, mitigate can be applied to the current Greenlink proposals. This is entirely and dangerously backward. (See section A. 4 & 5 above) Again, 30x30 goals cannot be disassociated from development proposals.
28.KB-2	And cumulative effects just from the lines alone will not be able to be considered. Let alone, all the energy and mining projects that will be happening, already are happening, along what are proposed routes at the moment, save for the one to the east.
30.JB-4	I hope you will be updating everyone who joined on everything about the Green Link and related questions we asked as time goes on. I don't mean me having to go to a website - you now have all our emails so I would hope you are going to email us on a very regular basis.
30.JB-5	Won't you be putting all our questions in your considerations or are we supposed to email you after this? is there some way we can copy the chat so we can keep track of the discussion?
35.KE-2	Can you have a public meeting like this with the National Park Service? It seems like BLM is unaware of many resources that are in the monument.
40.MM-8	The EIS should provide a detailed assessment of these potential risks to the environment and Public Lands of Nevada, so we can weigh the potential profits to large corporations against the environmental and social cost to the State of Nevada and the communities in path of the proposed development.
51.SB-1	The Greenlink West Project (Project) is an approximately 474-mile system of new 525 kV and 345-kV overhead electric transmission lines and includes transmission and distribution lines, substations, microwave radio facilities, amplifier sites, access roads, and construction/material yards. As stated in the application to the BLM, NV Energy has applied for a 600-foot-wide temporary ROW for construction and a 200 foot-wide permanent ROW for operations and maintenance of the 525-kV line and a 160-footwide permanent ROW for the 345kV lines. The facilities would include approximately 13,787 acres of land of which approximately 10,438 acres are public lands administered by the BLM. As stated, the purpose for the Project is to alleviate some of the capacity issues on existing transmission lines, and enhance electric grid reliability, by allowing interconnections to occur throughout the State. The Project will run from Las Vegas to Reno through Clark, Nye, Esmeralda, Mineral, Lyon, Storey and Washoe Counties. The end-point of Greenlink West would be Apex, Nevada, and three natural gas generating facilities bringing the natural gas baseload needed to power the tech companies and warehouses in Sparks and Reno. The Federal Register indicated that the transmission line would not benefit rural Nevada. Clearly Greenlink West is actually a "Gaslink" Project, yet, there are already 230 square miles of solar applications that have been tallied and investigated by Basin and Range Watch (https://www.basinandrangewatch.org/) to take advantage of the new transmission corridor. As a point of reference 230 square miles equals 147,200 acres or 11 times the acreage estimated for the transmission corridor. The majority of the proposed Project's 474-mile transmission corridor crosses remote and undisturbed portions of the Mojave and Great Basin Desert biomes (see Google Earth for Las Vegas to Reno terrain). Given the unique and undisturbed nature of lands within the proposed corridor, multiple adverse environmental effects are anticipated.
51.SB-2	The Notice of Intent (NOI) includes a list of significant components that require analysis. However, the NOI does not specifically require an analysis of how the project may contribute to climate change, an increase in greenhouse gas emissions, or affect carbon sequestration. For instance, there are no greenhouse gas emission estimates coinciding with the immediate construction and long-term maintenance components of this project. Another example attends to desert land restoration alternatives versus land disturbance caused by solar PV production. Importantly, the current EIS guidelines are also lacking an analysis for the CO2 that has been captured and sequestered underground by natural phenomena and by native plant species for hundreds to thousands of years. (See attached article by Dr. Michael Allen)
55.BH-2	I would like the BLM to pay particular attention to the following NEPA Regulations 40 CFR Parts 1500-1508 (May 20, 2022), emphasis added: § 1502.14 Alternatives including the proposed action. The alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment (§ 1502.15) and the environmental consequences (§ 1502.16). In this section, agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits. (c) Include the no action alternative. In the "No Project Alternative," a detailed analysis of the environmentally and culturally less harmful alternative of rooftop solar should be required in the Environmental Impact Statement (EIS) for the proposed Greenlink West Project. It is definitely a reasonable alternative which needs to be evaluated. A reasonable No Project alternative should not be narrowly construed to mean that there will be no increased electrical capacity if the Greenlink West transmission line isn't built.
68.MM-4	Will the EIS contain a projection of the anticipated profits? If we are to balance the environmental costs it makes sense to consider a representative balance sheet.
70.RS-6	Many years ago, BLM properly promised to be "smart from the start" when planning and approving alternative energy related projects. BLM in California did that with a comprehensive plan but BLM Nevada has not.

CID	General EIS Comments/Statements
72.TD-2	Sierra Club endorses the "Smart from the Start" framework for renewable energy and transmission siting, which encourages "transmission lines [that] follow lower-impact pathways to connect renewable energy zones."1 (1: 1 https://lands.nv.gov/uploads/documents/Smart_from_the_Start_Energy_Planning_Presentation.pdf) This framework has been supported by The Nature Conservancy, Defenders of Wildlife, The Wilderness Society, the Natural Resource Defense Council and Nevada State Land Use Planning Advisory Council. When projects are considered under the "Smart from the Start" criteria, we can expand renewable energy infrastructure that is critical to combating climate change while ensuring that such development occurs in a responsible manner that minimizes impacts to our desert habitats.
72.TD-3	Sierra Club is curious why this project and the Greenlink North Project are not being analyzed together in a single EIS. Because Greenlink West and North are connected through Yerington, Nevada we believe that a single environmental analysis would be more appropriate as these two power line corridors are interconnected and share a common endpoint.
74.PG-16	In accordance with 40 CFR 1508.8, we respectfully request the BLM evaluate the indirect impacts of the project in promoting new solar energy development; these connected actions would also have potential environment effects that should be disclosed in this EIS. Consistent with recent Council on Environmental Quality guidance for evaluating cumulative impacts, we ask the BLM to conduct a thorough evaluation of any pending right-of-way applications associated with new energy generation along the Greenlink West line should be disclosed. These are reasonably foreseeable future actions connected with the Greenlink West project, which require complete indirect and cumulative effects analyses in the EIS. Such analysis is critical for fully disclosing the environmental consequences of this project.
74.PG-19	A true smart from the start approach would involve the BLM Greenlink West EIS team working closely with the BLM Nevada-wide RMP team to programmatically evaluate and designate corridors and the locations for future renewable energy development as part of updated RMPs before issuing a decision on the Greenlink West EIS. Prioritizing resource management planning gives the BLM the foundation needed to make better informed project-level decisions.
74.PG-20	We appreciate the BLM's consideration of these comments, and we hope they contribute to a draft EIS that evaluates smart-from-the-start alternatives, fully discloses the indirect and cumulative impacts of the project, and is supported by updated RMPs.
81.CO-03	The enabling legislation for Tule Springs Fossil Beds NM states under Section 4, Renewable Energy Transmission Facilities: *On receipt of a complete application from a qualified electric utility, the Secretary, in accordance with applicable laws (including the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and title V of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1761 et seq.)), shall issue to the qualified electric utility a 400-foot-wide right-of-way for the construction and maintenance of high-voltage transmission facilities depicted on the map entitled ''North Las Vegas Valley Overview'' and dated November 5, 2013, as ''Renewable Energy Transmission Corridor'' if the high-voltage transmission facilities do not conflict with other previously authorized rights-of- way within the corridor. (Pub. L. 113-291, 128 Stat. 3791 (2014))* Issue: NPS must receive and review right-of-way (ROW) permit applications for infrastructure proposed within the boundaries of an NPS unit, or the NPS' responsibility to determine whether to issue a ROW permit within a park unit in accord with applicable laws and regulations. The NPS also determines the terms and conditions of a ROW permit to meet NPS statutory, regulatory, and policy requirements. Recommendation: The NPS recommends and offers to work with BLM to ensure the NEPA analysis is sufficient for the requirements of both agencies.
81.CO-04	Utilities that pass over, under, or through NPS-managed land must be authorized under an NPS issued ROW permit (54 USC 100902, 36 CFR Part 14). NPS ROW permits allow utilities to operate and maintain infrastructure over, on, or under NPS lands; they set the terms and conditions for such operation and maintenance. NPS Director's Order 53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the used of NPS lands." The NPS has recommended to the project proponent and its contractors, and to the BLM and its contractors, that a third-party engineering consultant evaluate the project proposal to identify any micrositing or route alternatives that would minimize impacts to NPS lands and resources. Issue: The NPS understands there are several routing alternatives through Tule Springs Fossil Beds NM, as stated in previous Cooperating Agency meetings and in the most recent Plan of Development (POD). The POD does not include an NPS ROW permit in the project proponent's requirements for any routing alternatives. The project proponent is required to to submit a ROW application to the NPS. The NPS is aware of resource surveys the project proponent is actively conducting to include in a NPS ROW application package. Recommendation: The NPS has previously provided information to the project proponent and BLM staff on the NPS ROW permitting process. The NPS recommends the BLM and project proponent meet with NPS personnel from Tule Springs Fossil Beds NM and the regional office for Interior Regions 8, 9, 10 and 12 to further clarify the NPS ROW application and permitting process. The discussion will include all supporting documents required in an SF-299 ROW permit application; NPS ROW permitting standards including cost recovery, annual rent calculations, permit terms (generally for 10 years' duration); and activities allowed under a ROW permit. As the federal agency with administrative authority over public lands in Tule Springs Fossil Beds NM, the POD must identify the NPS as a potential permitting agency. In addition to resource surveys, the NEPA environmental analysis will need to include site-specific analyses if the proposed routes across Tule Springs Fossil Beds NM are retained as alternatives.
81.CO-17	The NPS serves as a NEPA Cooperating Agency for the Greenlink West Project and looks forward to effective collaboration and cooperation with the BLM. Issue: The Federal Register Notice initiating the scoping process for this project was published on April 29, 2022. Recent changes to federal NEPA regulations took effect May 20, 2022. The "Phase One" final rule reinstated three key provisions to (1) Purpose and Need, (2) Agency NEPA Procedures, and (3) Definition of "Effects" or "Impacts". Recommendation: The NPS recommends that the BLM clarify how Phase I final rule may be incorporated into the NEPA process for the Greenlink West project. The NPS supports a redefinition of the Purpose and Need according to the revised regulations, to consider the BLM's purpose and need and range of reasonable alternatives, particularly around Tule Springs Fossil Beds NM. A robust and comprehensive analysis and discussion on the Cumulative Effects of all proposed utility scale transmission, utility scale solar fields, and mining operations for gold and lithium, particularly around Death Valley NP, should also be included in the EIS. Overall, due to the level of development interest (i.e., solar, transmission, gold and lithium mining) in the Amargosa Valley, the NPS recommends the BLM collaborate with other agencies and partners on landscape level analysis and planning of the Nevada desert to identify areas most appropriate for development and to minimize impacts to sensitive resources.

CID	Scoping and Comment Process Comments/Statements
13.KE-6	The BLM public scoping meetings were held only in-person in Las Vegas, Beatty, Tonopah, and Reno, severely reducing public participation. At other times BLM has held these meetings via Zoom. In person meetings are inappropriate during a current time when Covid-19 Omicron infection rates are surging in Nevada.
77.TA-20	In April of 2021, Sec Haaland promised in her Secretarial order, "…to improve agency transparency and public engagement in the decision making process." Thank you for the opportunity of public engagement to provide my comments during the scoping period for the Greenlink West Project Environmental Impact Statement and Potential Resource Management Plan Amendments Public Scoping. Yet DOI BLM lacks transparency and the comments presented herein reflect public mistrust. We look forward to a direct written response from BLM regarding these comments and concerns.
31.KE-1	Please accept this short public comment for the scoping period on the Greenlink West Project about the public process for receiving comments. There is no special email to send in comments but the main email is the project manager, Greg Helseth at ghelseth@blm.gov. Since BLM wrapped this deadline on the Memorial Day holiday weekend, all public comments got the response that G Helseth (see below) is on vacation and inquiries should go to Nate Rasner of the BLM. This was confusing because in the past, BLM has created specific emails for these projects. Since the BLM has misplaced 3 of our comments in the past, I called to make sure the comments were accepted and I was told I am being "silly" by the public relations specialist, Rita Henderson. Honestly, I just wanted to know if there were any problems and we had to resend the comments. It is not really "silly" at all because the BLM process can be very confusing. But BLM has a very interesting group in the Nevada State Office! That was a first in about 25 years of public commenting to BLM! The three misplaced comments were for: Number 1: Gemini Solar DEIS comments Number 2: Yellow Pine Solar DEIS comments Number 3: BLM lost the protest we sent for the Gemini Solar Project. It took them about 3 months to locate it and we had to resubmit it. This public comment requests better communication so commenters are not confused about where the comments are going at the 11th hour.
37.MG-1	The Nevada Offroad Association (NVORA) in partnership with Nevada's largest desert racing groups, is requesting the motorized offroad community and their interests be included in the Greenlink West (DOI-BLM-NV-0000-2022-0004-EIS) scoping.
58.LL-1	NPS comments for the Greenlink West Project have been prepared. There's nothing in there that we haven't already brought up. We have a fairly new Regional Director (Frank Lands) for Interior Region 8, 9, 10 and 12 and he is in the process of familiarizing himself with NPS issues. Director Lands reached out and will be meeting with the BLM Nevada State Director on Friday (6/3) to connect on the project. We will send our comments to you after their meeting. Let me know if you have any questions.

CID	Transportation Infrastructure Comments/Statements
07.CB-1	I too am concerned about I-11. And it would seem to me that you would want to avoid being right next to the highway. Most of what I've read on I-11 is that they want to widen 95, so I think that's a valid question about looking at I-11.
08.JH-3	So that's Interstate 11, which the state has been talking about for years, and they have actually laid out essentially a corridor between Las Vegas and Reno. They could have gone up Highway 93 and elected 95 to do that. So the EIS needs to address I-11.
10.US-1	The Federal Highway Administration, when they designate interstate corridors, say that those multimodal corridors, they are not only for highways. They're for rail, they're for communications, and they're for electric power. How does this conform to the I-11 corridor? So a freeway basically from the Mexican border north through Canada. So it goes Highway 90-93 up through Arizona, and it comes across the bridge there just below Hoover Dam -and comes into the Las Vegas valley. And then there's some debate about which freeway it will take through the Las Vegas valley, whether it will take I-15 to 215 or just go 215 all the way around. That's yet to be decided. But then it's supposed to go from the Las Vegas valley up to Reno.
25.JW-1	You mentioned -- you referenced a freeway several times. Do you mean Highway 95? Is that where the alignment of the potential Freeway 11 is going to go? There's no 11. Interstate 11 north of Las Vegas is not a tangible project that we can really deal with it. And -- but people generally say it's similar to Highway 95. But there's nothing to point to as what is Interstate 11 north of Las Vegas. Well, that's the problem. You need to integrate. If you're going to run these linear things from Vegas to Reno, you need to put them together and do the minimum impact.
74.PG-15	The Greenlink West transmission line and two new substations will make new renewable energy development, particularly large utility-scale solar projects, economically and technologically feasible. Pursuant to 40 CFR 1508.25, the scope of an EIS should consider connected actions, which are those closely related to the proposed action because they are triggered by the proposed action, cannot or would not proceed without the proposed action, or are an independent part of a larger action and depend on the larger action for justification. Without the Greenlink West project, the likelihood for new large-scale solar projects along the proposed line route would be much less. Similarly, the final Greenlink West alignment and associated utility corridor is likely to influence the alignment of future energy and infrastructure projects, such as the planned Interstate 11 transportation route.

01.WC-3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13S 48E
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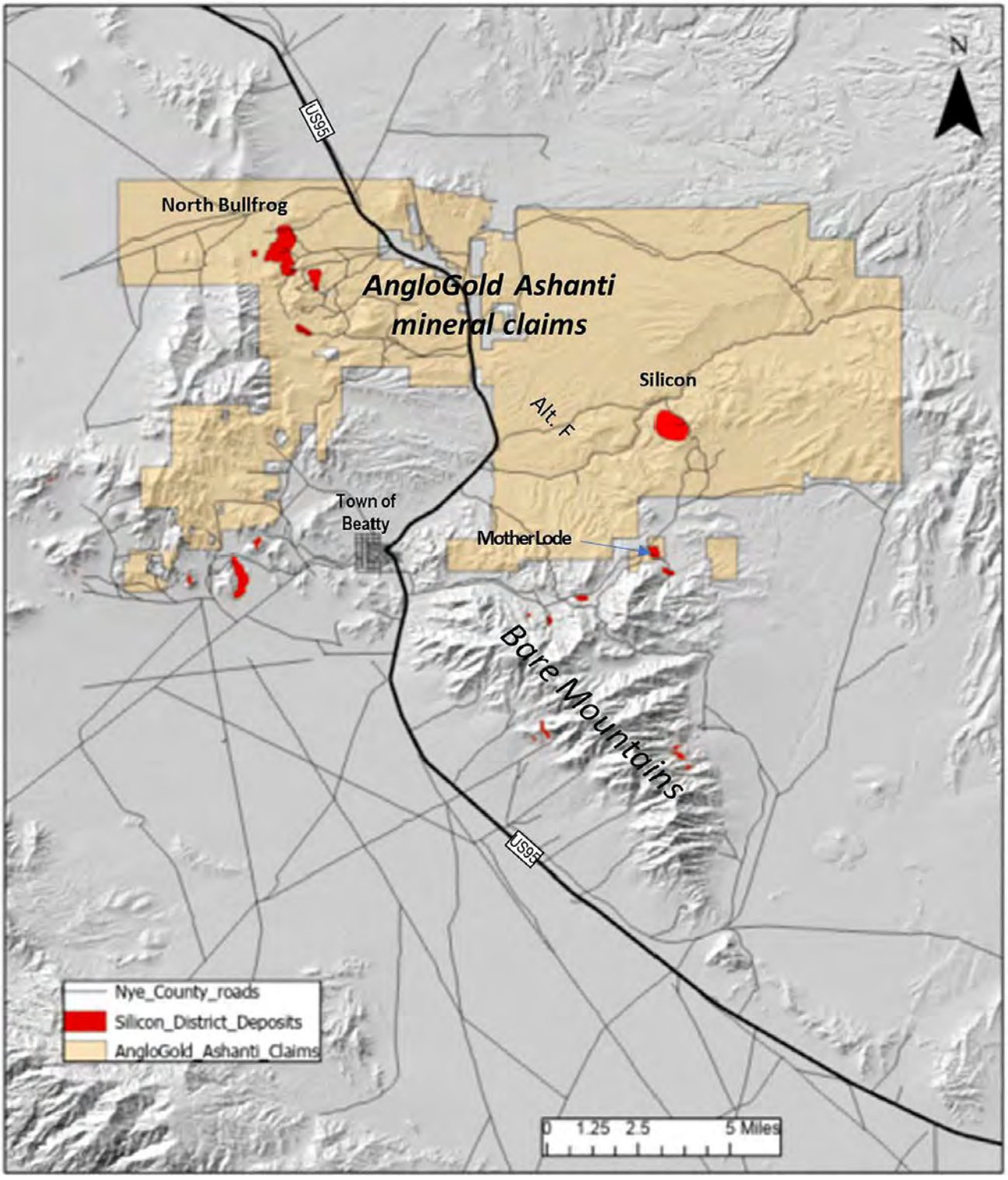
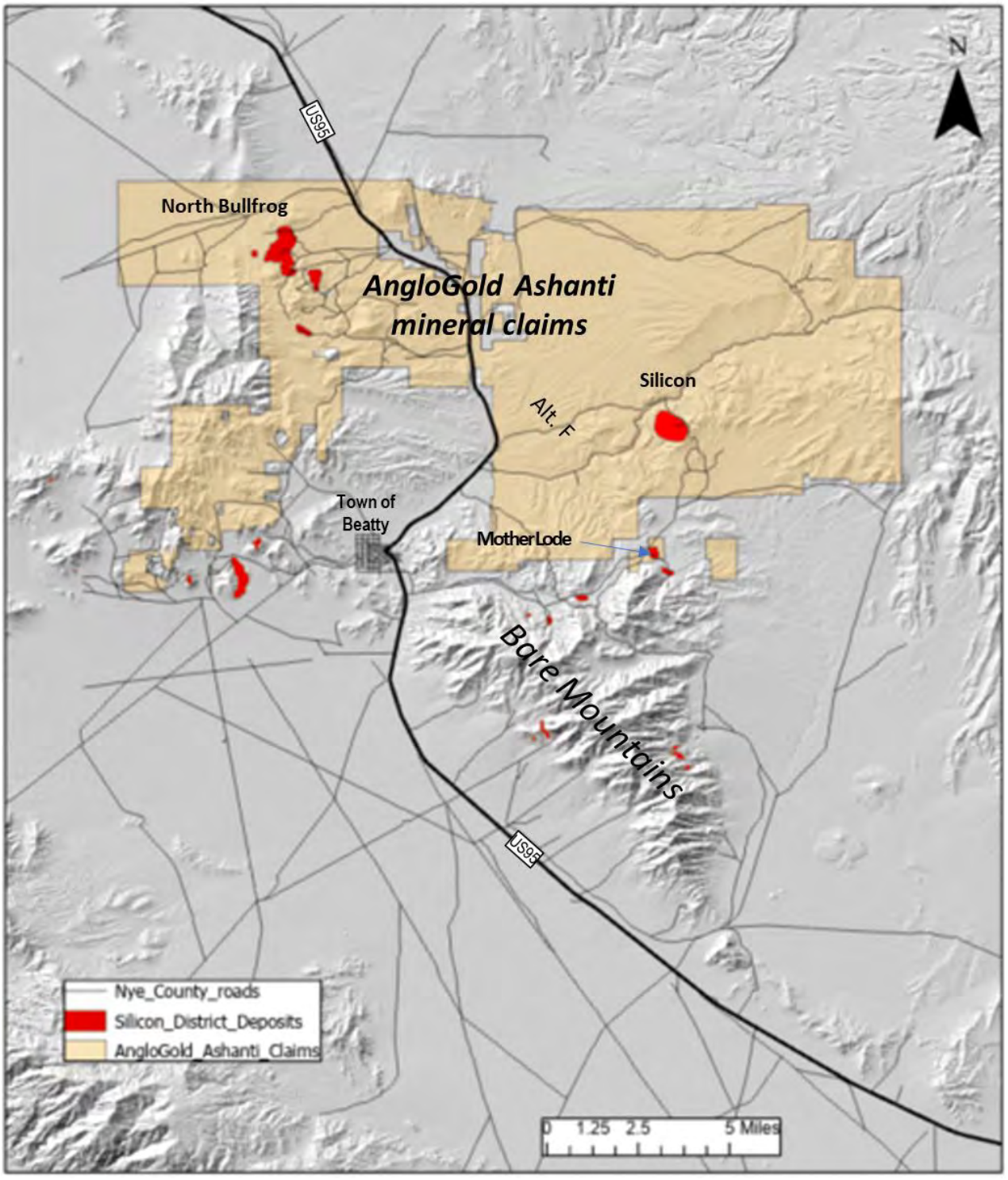
13S 50E

02.AGA-1


N
US95
North Bullfrog
AngloGold Ashanti
mineral claims
Silicon
Alt. F
Town of
Beatty
MotherLode
Bare Mountains
US95
Nye_County_roads
Silicon_District_Deposits
AngloGold_Ashanti_Claims
0 1.25 2.5 5 Miles

02.AGA-4


US95
North Bullfrog
AngloGold Ashanti
mineral claims
Silicon
Alt. F
Town of
Beatty
MotherLode
Bare Mountains
US95
N
Nye_County_roads
Silicon_District_Deposits
AngloGold_Ashanti_Claims
0 1.25 2.5 5 Miles

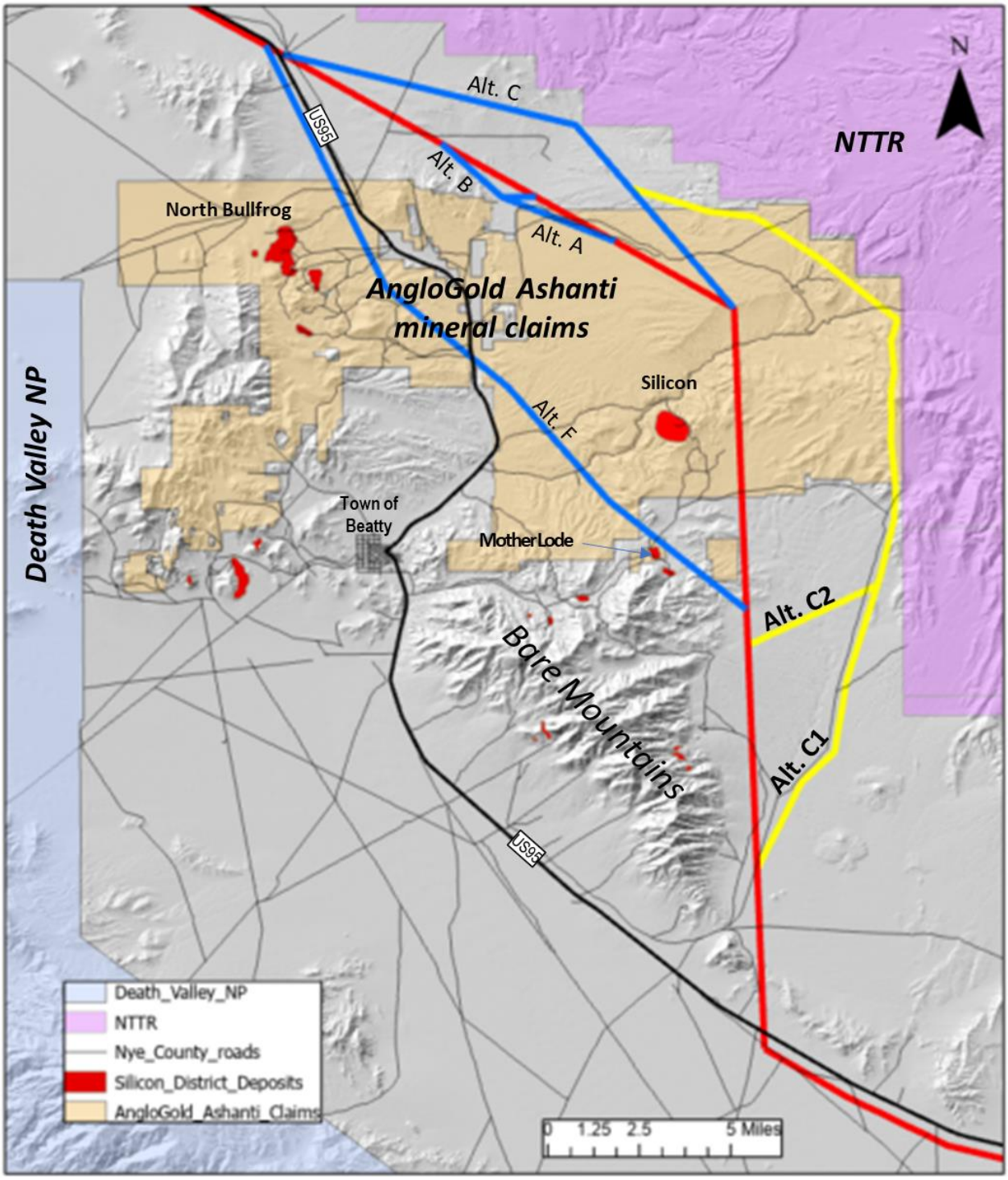


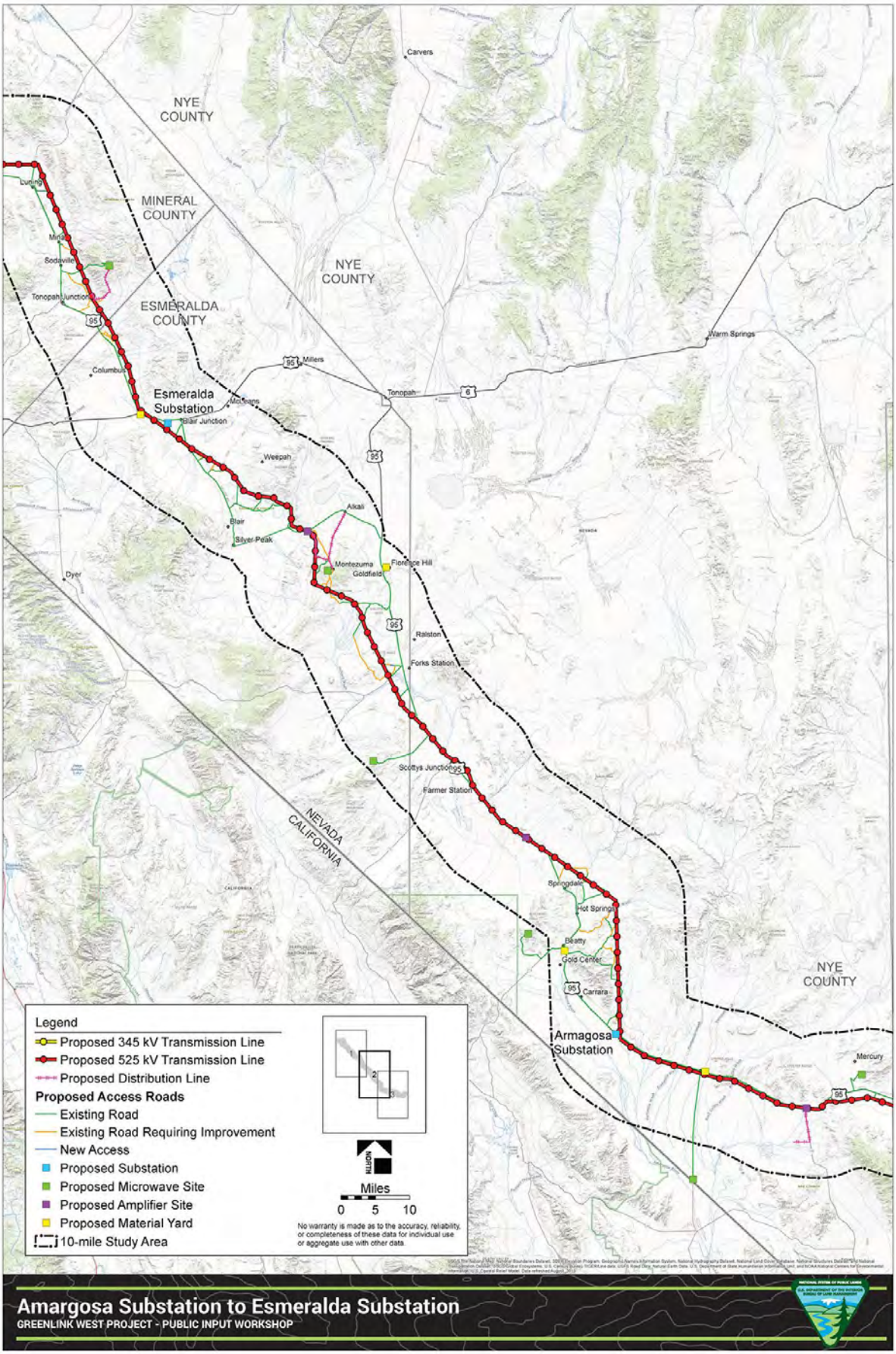
Figure 2
AGA's Modified Alternative C

Proposed Action shown (in Red)

Alternatives A, B, C, and F shown (in Blue)

Modified Alternative C (C1 and C2 shown in Yellow)

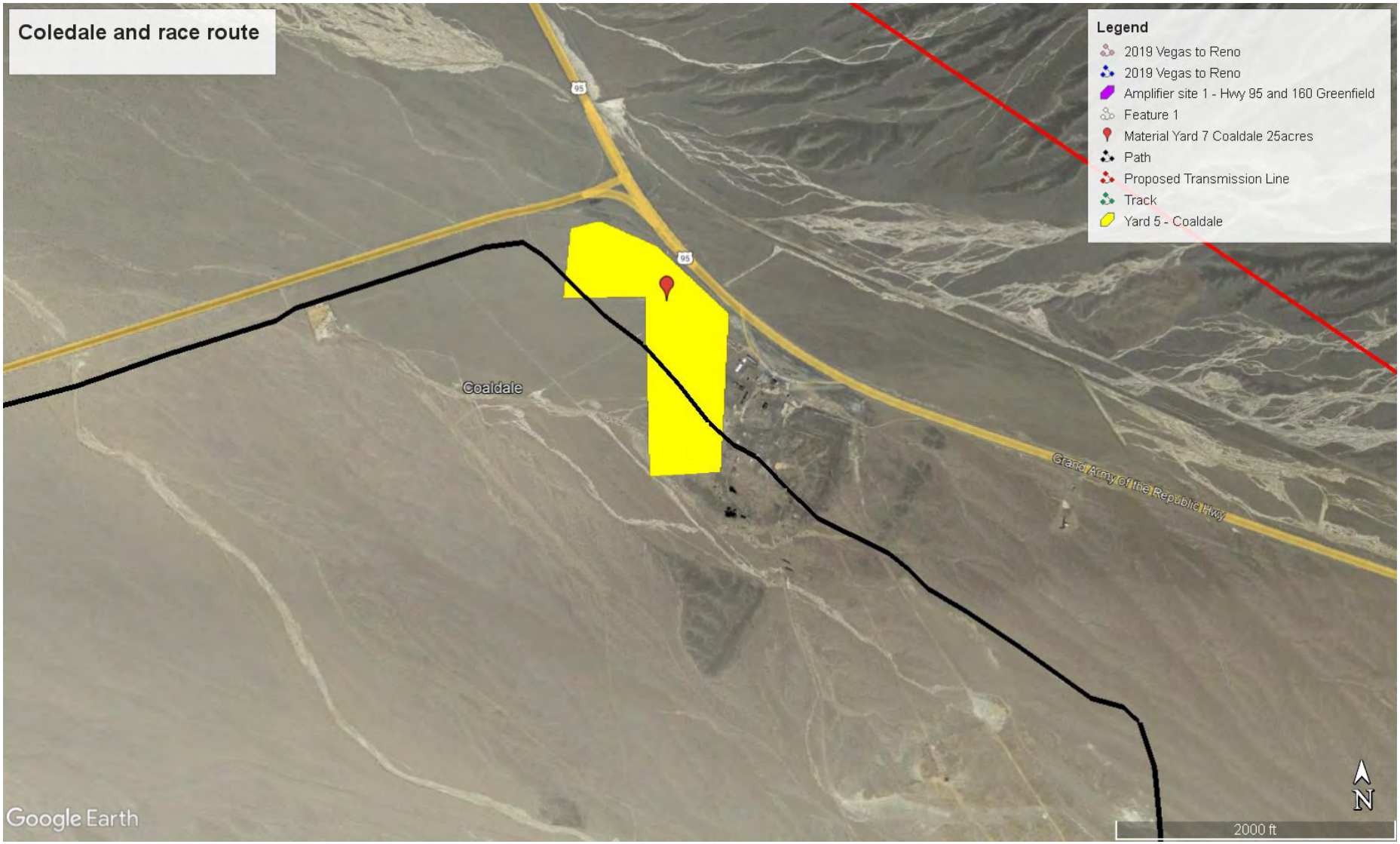
06.KE-3


NYE COUNTY
MINERAL COUNTY
ESMERALDA COUNTY
NYE COUNTY
NYE COUNTY
Carvers
Luning
Mina
Sodaville
Tonopah Junction
Columbus
Esmeralda Substation
Blair Junction
Millers
Tonopah
Warm Springs
Weepah
Alkali
Blair
Silver Peak
Montezuma
Goldfield
Florence Hill
Dyer
Ralston
Forks Station
Scottys Junction
Farmer Station
NEVADA
CALIFORNIA
Springdale
Hot Springs
Beatty
Gold Center
Carrara
Armagosa Substation
Mercury
95
6
Legend
Proposed 345 kV Transmission Line
Proposed 525 kV Transmission Line
Proposed Distribution Line
Proposed Access Roads
Existing Road
Existing Road Requiring Improvement
New Access
Proposed Substation
Proposed Microwave Site
Proposed Amplifier Site
Proposed Material Yard
10-mile Study Area
NORTH
Miles
0 5 10
No warranty is made as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.
Amargosa Substation to Esmeralda Substation
GREENLINK WEST PROJECT - PUBLIC INPUT WORKSHOP

11. Raven Management Plan – The DEIS should analyze whether this new transmission line would result in an increase of common ravens and other predators of the desert tortoise in the affected regions. For example, common ravens are known predators of the tortoise, and use transmission and distribution lines as structures for nesting and hunting (Lovich and Bainbridge 1999). During construction, operations and maintenance, and if appropriate, decommissioning of the proposed action, BLM should require science-based monitoring of tortoise predation and managing it to pre-project levels. The monitoring and management plan should implement actions that would eliminate human subsidies associated with transmission lines such as food, water, and sites for nesting, roosting, and perching and address its effectiveness at a local, regional, and range wide level for the tortoise. It is very important that in tortoise habitats, the Proponent use towers for transmission and distribution lines with a design that prevent raven nesting. For example, the tubular design or monopole with insulators on horizontal or downward sloping cross arms is preferable, as this design reduces the availability of nesting and roosting substrates for common ravens that lattice towers provide. Lattice towers should not be used.

Please ensure that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a project-specific management plan for common ravens. This template includes sections on construction, operation, maintenance, and decommissioning (including restoration) with monitoring and adaptive management during each project phase (USFWS 2010).

10.MG-1


Coledale and race route
Legend
2019 Vegas to Reno
2019 Vegas to Reno
Amplifier site 1 - Hwy 95 and 160 Greenfield
Feature 1
Material Yard 7 Coaldale 25acres
Path
Proposed Transmission Line
Track
Yard 5 - Coaldale
95
95
Coaldale
Grand Army of the Republic Hwy
Google Earth
N
2000 ft

13.KE-20

Pronghorn antelope mother and newborn fawn during a wildflower bloom just east of US 95 in Sarcobatus Flat. Several pronghorn were giving birth here. The mapped route of the Greenlink line would disturb this sensitive area. 2020. Photo: Kevin Emmerich.

Nevada PUC staff recommends cost of mitigation issues with ON Line not be passed on to customers

The staff of the Public Utilities Commission of Nevada (PUCN) has recommended that the developers of the One Nevada Transmission Line (ON Line) not be allowed to pass on to its customers the cost of mitigating wind-induced vibration on some of the towers being erected for the project being constructed by **NV Energy** and **Great Basin South Transmission** (Docket No. 12-06053).

In testimony submitted to the PUCN on Sept. 10 Mario Villar, NV Energy's vice president of transmission said the owners of the ON Line had identified, tested, and confirmed "a technical solution to mitigate the wind-induced vibration on the ON Line's tubular guyed-V towers."

Villar said retrofitting tubular guyed-V structures "with helical strakes that alter the flow of wind around the tower structural members [will] significantly mitigate wind-induced vibration."

According to the Journal of Fluids and Structures, helical strakes can reduce vortex-induced vibrations by approximately 98%.

In his testimony, Villar further stated that the “retrofit can be completed in time to meet the revised schedule and within the revised budget of $552.1m.”

In testimony filed with the PUCN on Oct. 19, staff disagreed with Villar’s figures.

“Due to the wind-induced vibration problems, the total construction costs for the ON Line project are expected to increase to $620.2m,” financial analyst Fred Buck said in testimony.

He also referred to testimony provided by another staff member who said, “The incremental increase in costs attributable to the wind-induced vibration problems is unknown at this point.”

Buck said PUCN staff recommended that the utilities be ordered to exclude “any and all incremental costs arising from changes and delays to the project due to the wind vibration issue” when calculating the monthly amount the utilities are allowed to pass through the deferred energy process.

PUCN staff also recommended that the utilities be ordered to place the difference into a deferred regulatory asset account “for later investigation and disposition,” arguing that the costs should be borne by parties other than the utilities’ customers.

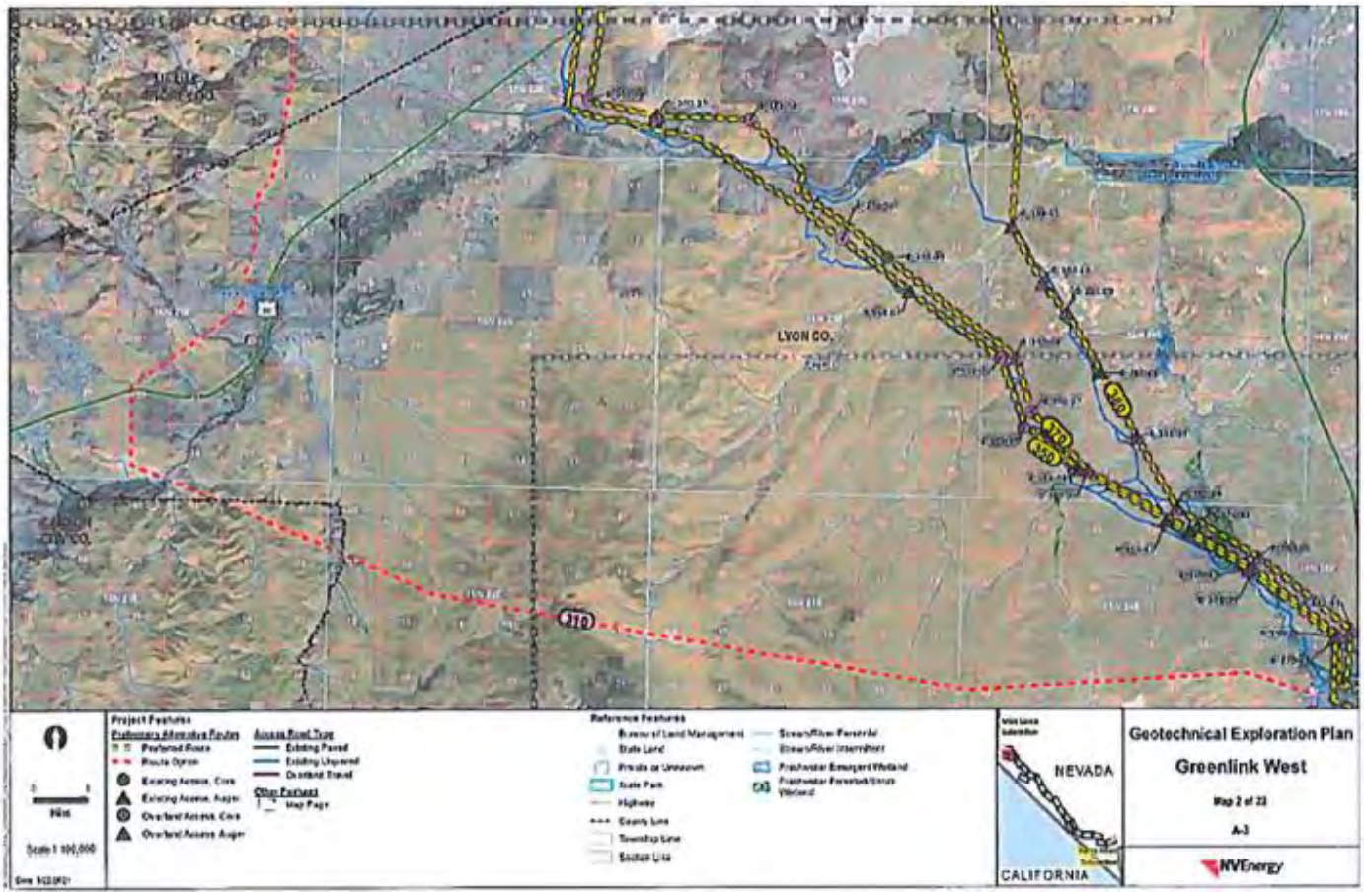
“[T]o the extent that the construction problems and delay are determined to be the result of equipment and/or design failures, the utilities should seek redress from other parties,” Buck continued.

“Recovery from ratepayers should be the last resort, not the first,” his testimony noted.

When contacted by *TransmissionHub*, a spokesperson for NV Energy said the company would file rebuttal testimony with the PUCN on Nov. 2.

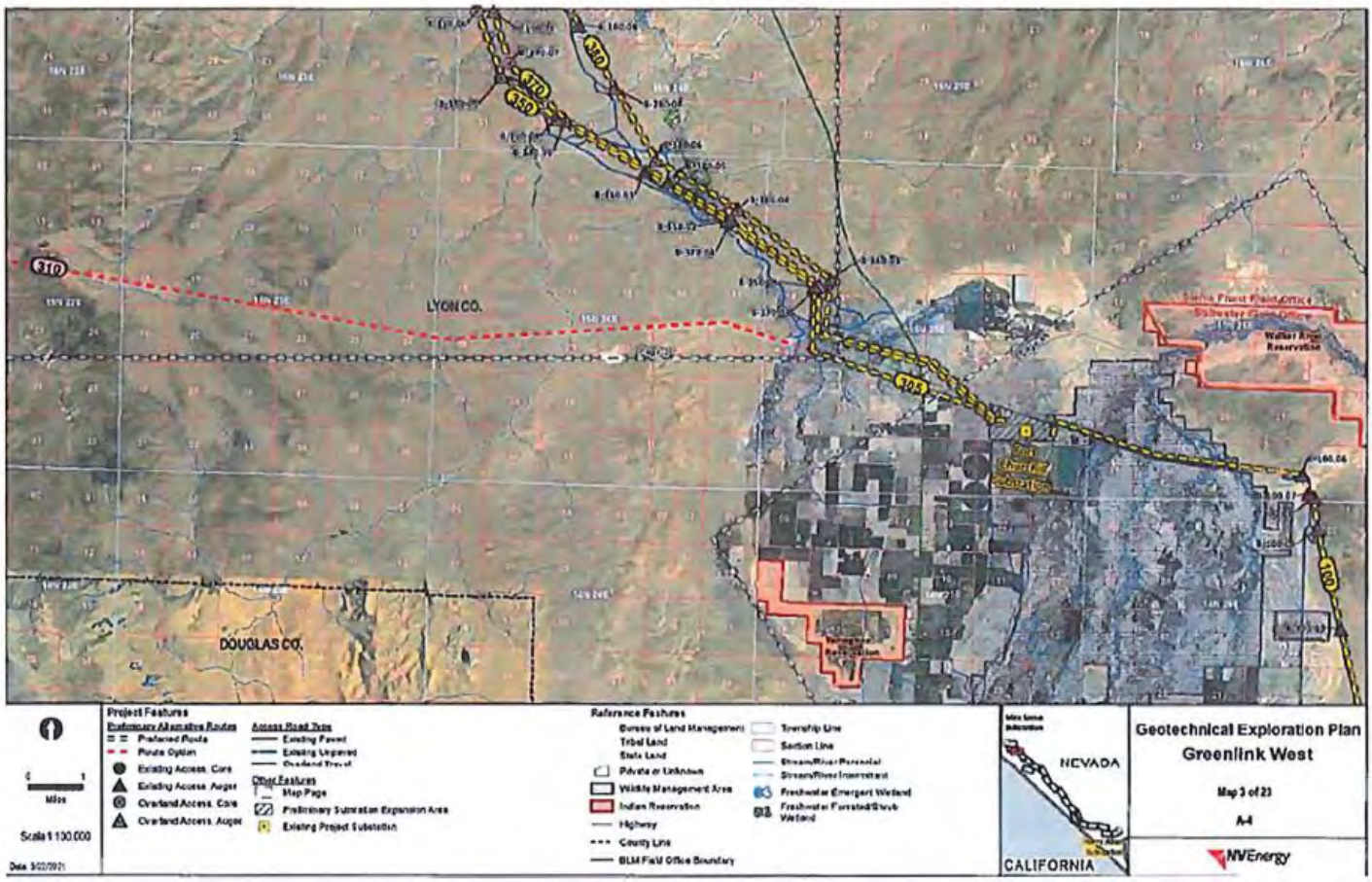
14.CH-7 - 14.CH-18

FIGURE 1



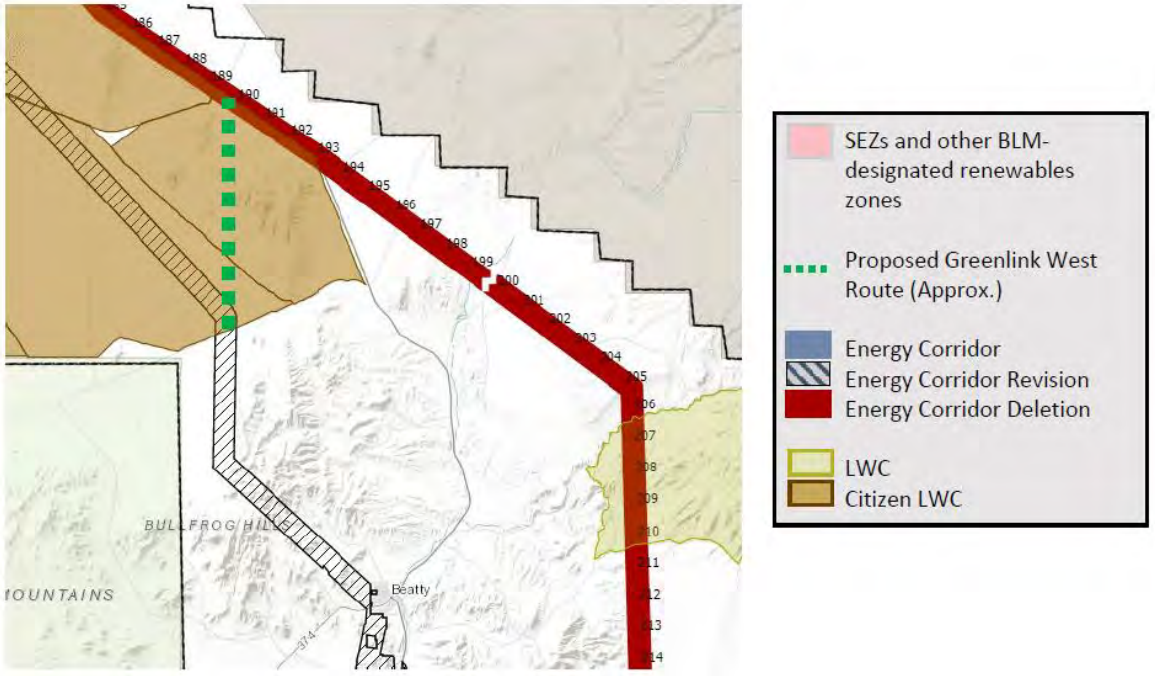
14.CH-7 - 14.CH-18

FIGURE 2



14.RS-2, 14.RS-3, 14.RS-5

ALT ROUTE:



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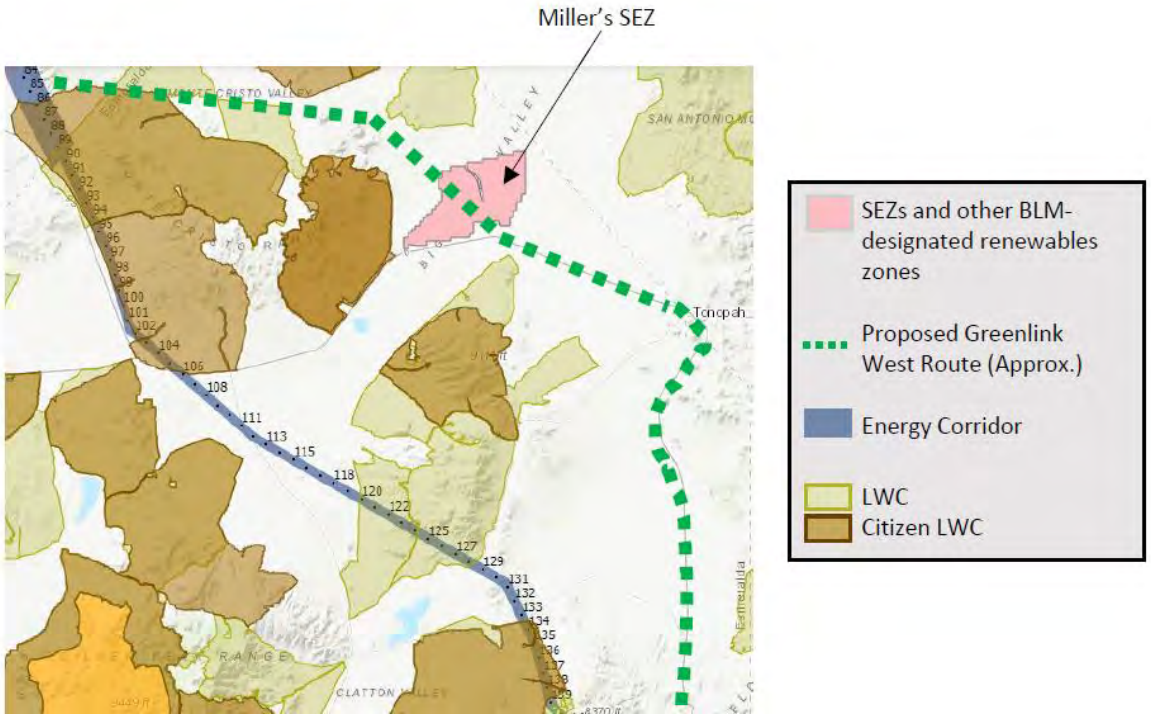


FIGURE 3

U.S. Department of the Interior
Bureau of Land Management

6) Mason Valley WMA Alternatives (Blue)

- Blue 'P'
  - Avoids Walker River Paiute Indian Reservation
  - Line crossing to span approximately 1,100 feet over the Mason Valley WMA
  - 200-foot width permanent ROW required

These preliminary alternatives are working drafts.

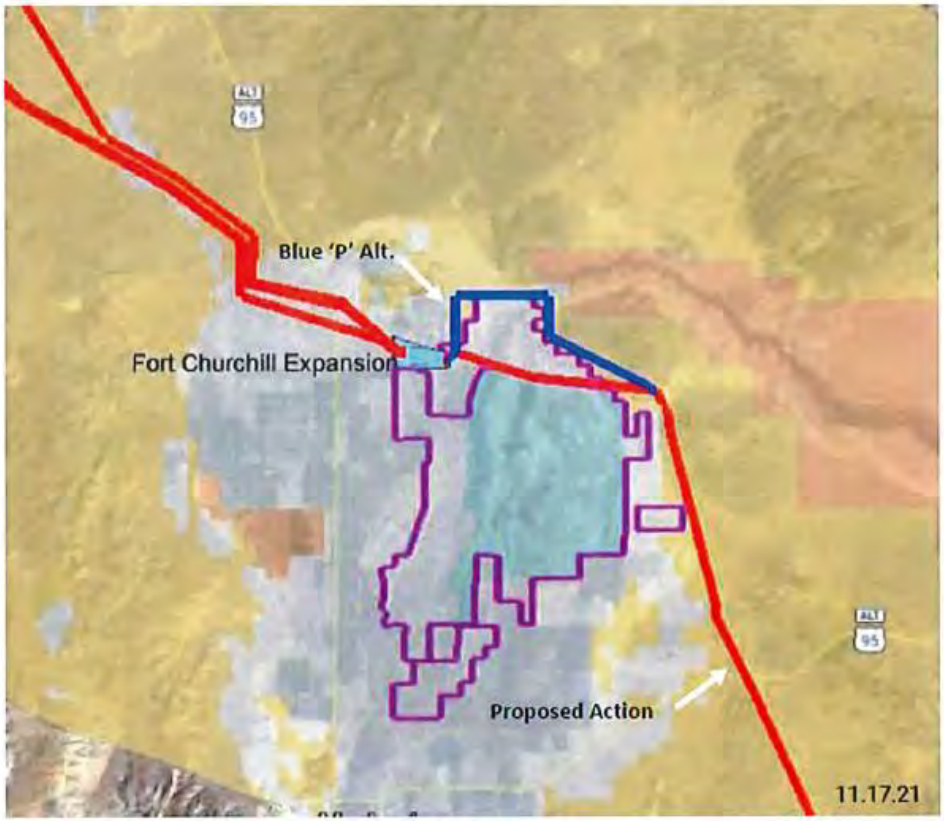


FIGURE 4

U.S. Department of the Interior
Bureau of Land Management

6) Mason Valley WMA Alternatives (Blue)

- Blue 'N'
  - Avoids Mason Valley WMA
  - Portion of the alternative alignment follows existing transmission line
  - Crosses Walker River Paiute Indian Reservation

These preliminary alternatives are working drafts.

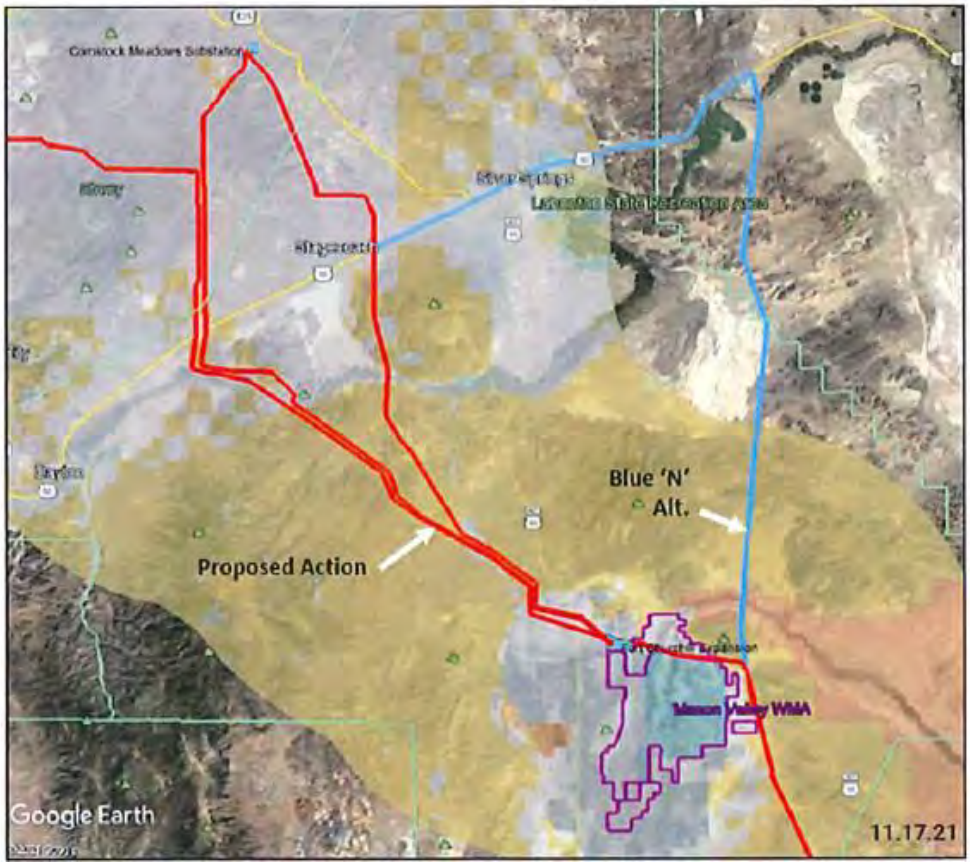


FIGURE 5

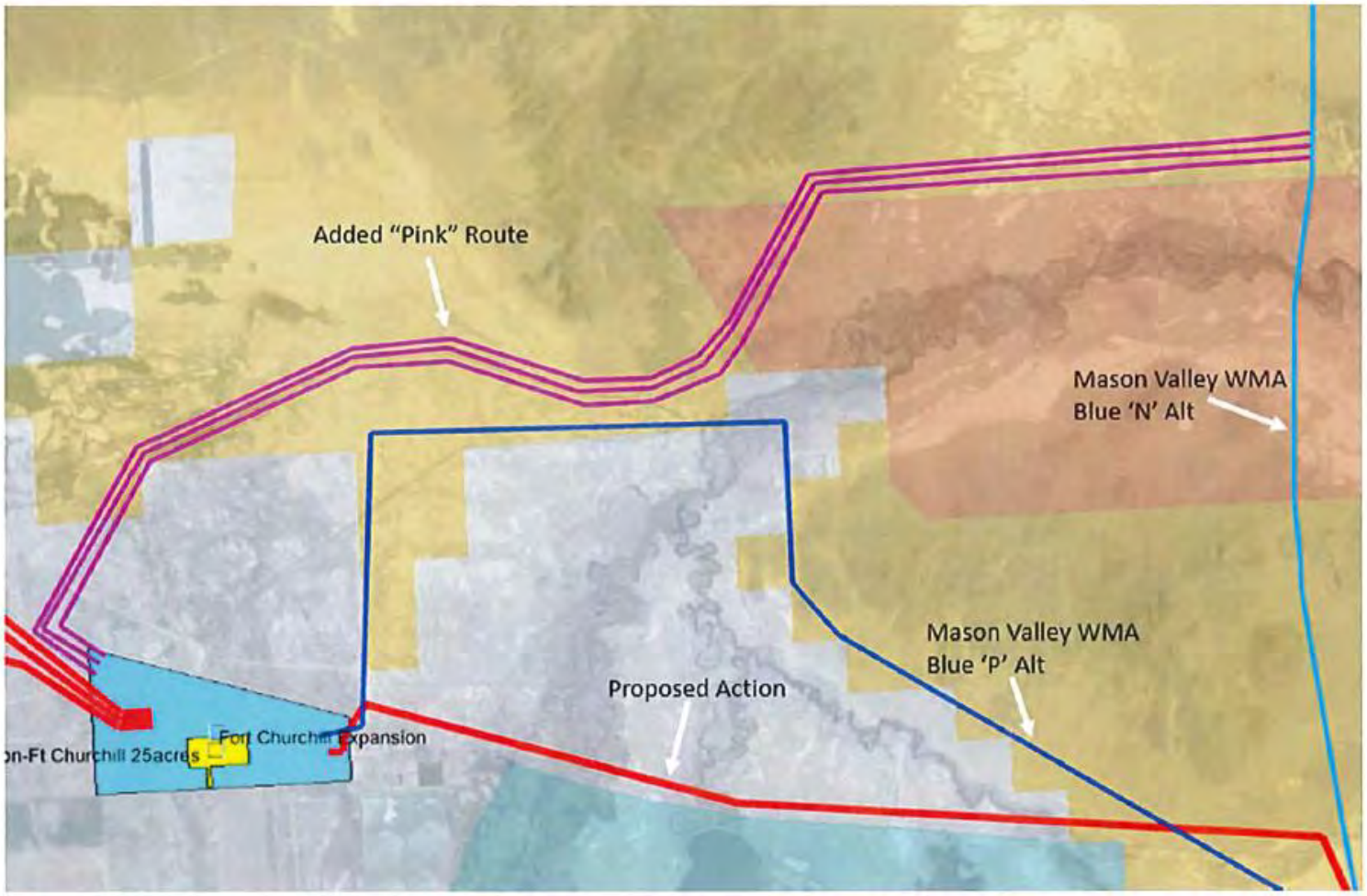
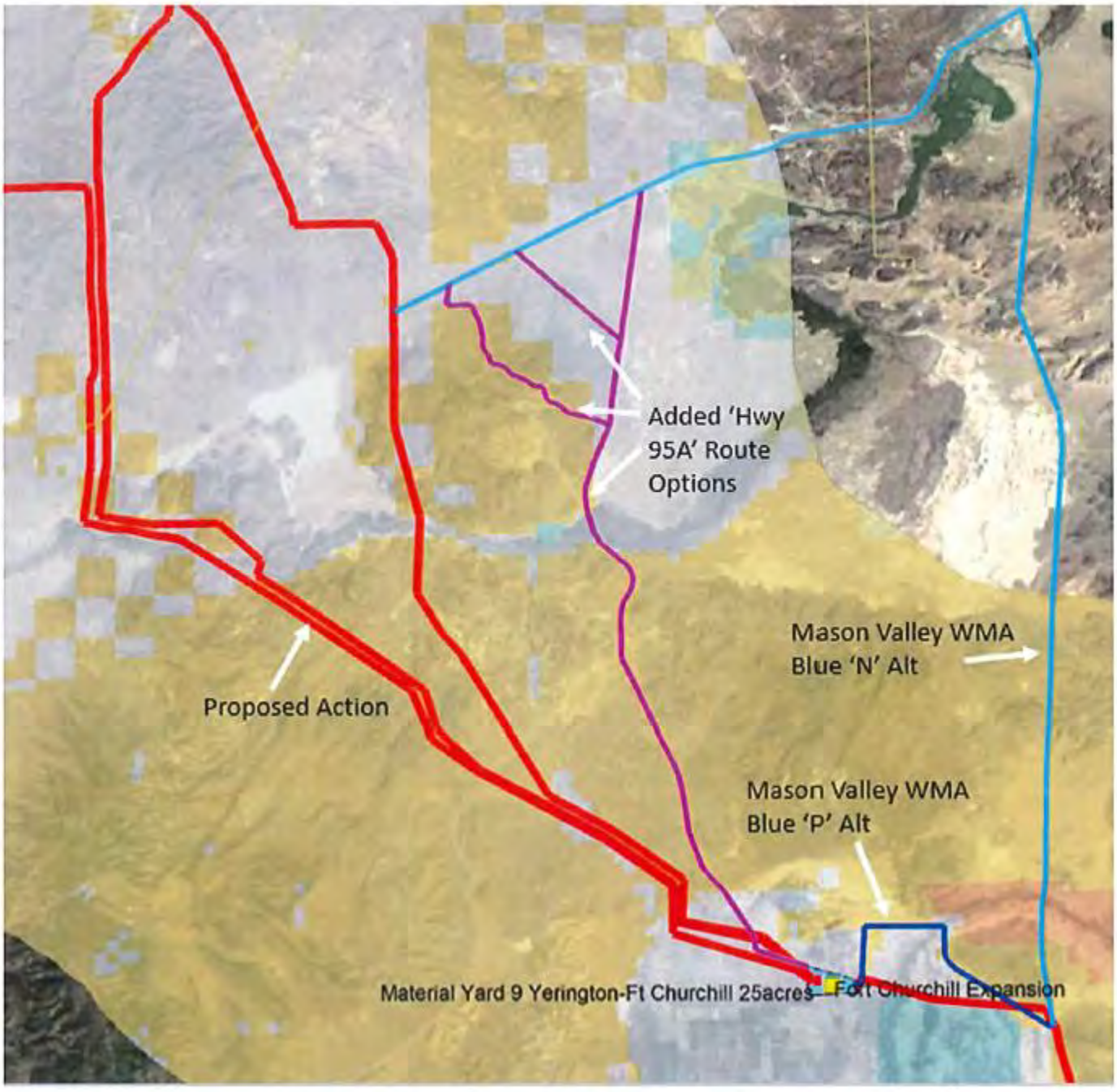

Added "Pink" Route
Mason Valley WMA
Blue 'N' Alt
Mason Valley WMA
Blue 'P' Alt
Proposed Action
Fort Churchill Expansion
on-Ft Churchill 25acres

FIGURE 6


Added 'Hwy 95A' Route Options
Mason Valley WMA Blue 'N' Alt
Proposed Action
Mason Valley WMA Blue 'P' Alt
Material Yard 9 Yerington-Ft Churchill 25acres
Fort Churchill Expansion

29.KE-1

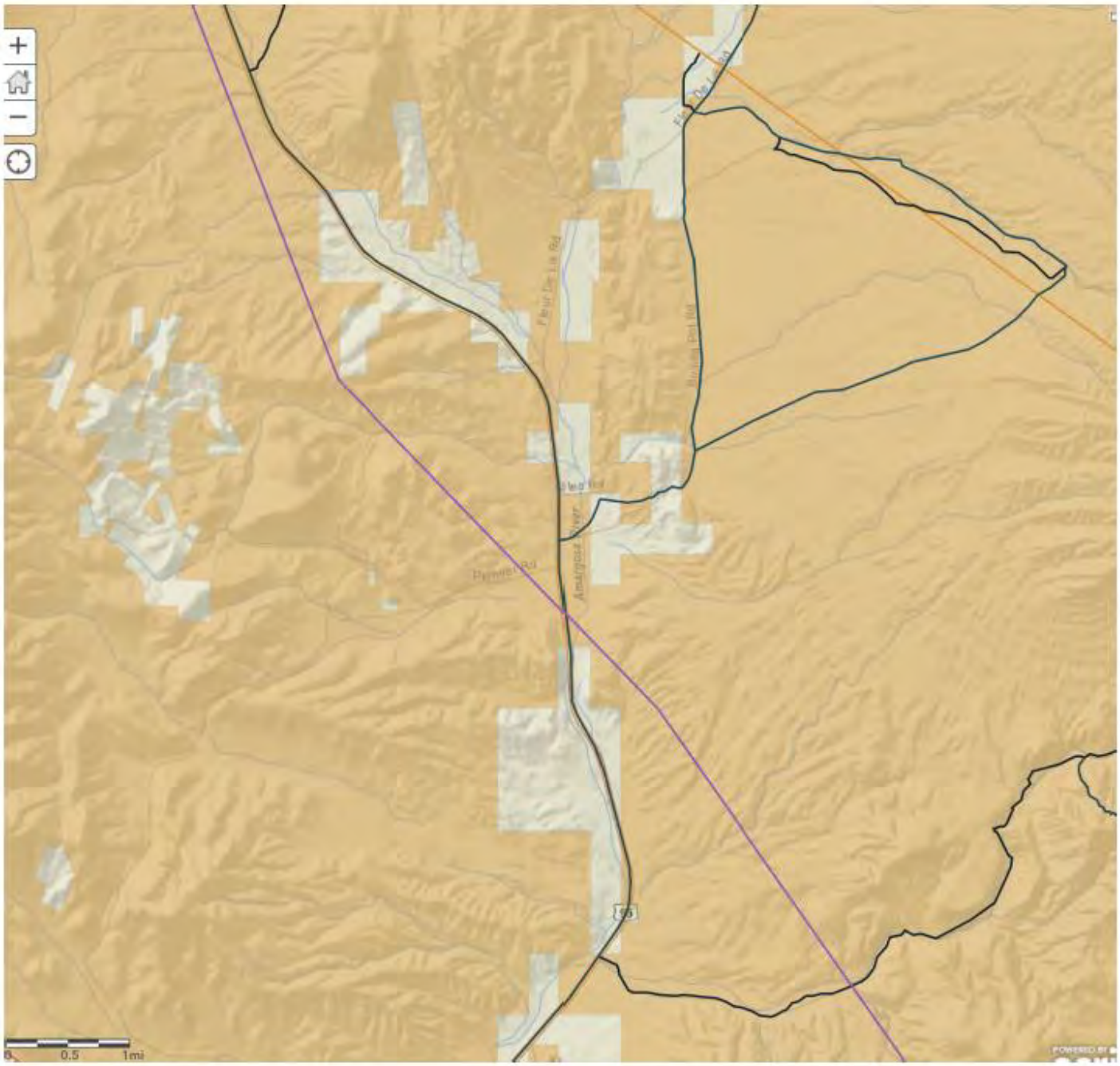
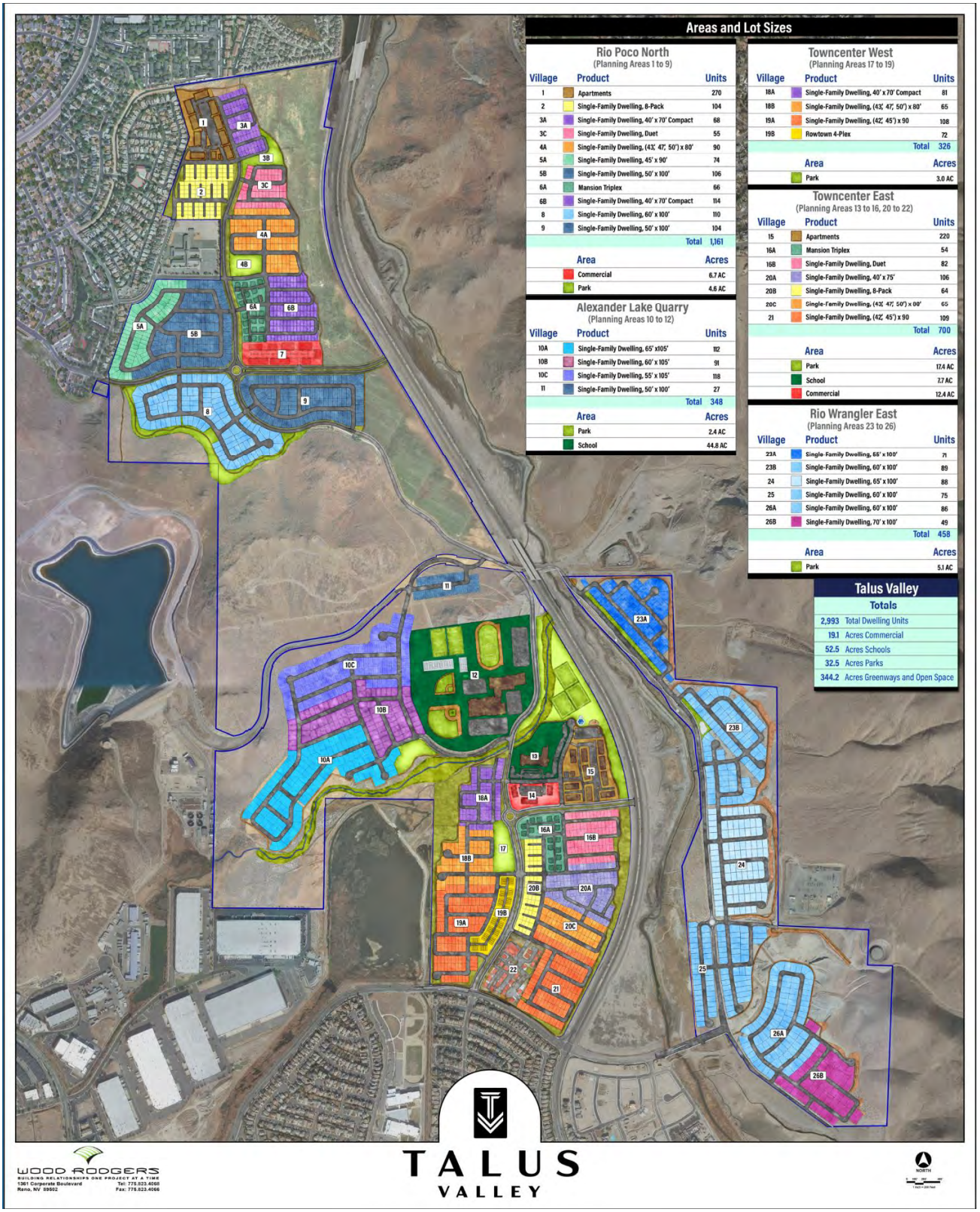


Figure 1. Map of the proposed Greenlink West Transmission Project, Alternative K pink line under review. Orange line if the original Alternative. From kmz. files provided by BLM.

41.MR-1


Areas and Lot Sizes
Rio Poco North
(Planning Areas 1 to 9)
Village | Product | Units
1 | Apartments | 270
2 | Single-Family Dwelling, 8-Pack | 104
3A | Single-Family Dwelling, 40' x 70' Compact | 68
3C | Single-Family Dwelling, Duet | 55
4A | Single-Family Dwelling, (43', 47', 50') x 80' | 90
5A | Single-Family Dwelling, 45' x 90' | 74
5B | Single-Family Dwelling, 50' x 100' | 106
6A | Mansion Triplex | 66
6B | Single-Family Dwelling, 40' x 70' Compact | 114
8 | Single-Family Dwelling, 60' x 100' | 110
9 | Single-Family Dwelling, 50' x 100' | 104
Total 1,161
Area | Acres
Commercial | 6.7 AC
Park | 4.6 AC
Alexander Lake Quarry
(Planning Areas 10 to 12)
Village | Product | Units
10A | Single-Family Dwelling, 65' x105' | 112
10B | Single-Family Dwelling, 60' x 105' | 91
10C | Single-Family Dwelling, 55' x 105' | 118
11 | Single-Family Dwelling, 50' x 100' | 27
Total 348
Area | Acres
Park | 2.4 AC
School | 44.8 AC
Towncenter West
(Planning Areas 17 to 19)
Village | Product | Units
18A | Single-Family Dwelling, 40' x 70' Compact | 81
18B | Single-Family Dwelling, (43', 47', 50') x 80' | 65
19A | Single-Family Dwelling, (42', 45') x 90 | 108
19B | Rowtown 4-Plex | 72
Total 326
Area | Acres
Park | 3.0 AC
Towncenter East
(Planning Areas 13 to 16, 20 to 22)
Village | Product | Units
15 | Apartments | 220
16A | Mansion Triplex | 54
16B | Single-Family Dwelling, Duet | 82
20A | Single-Family Dwelling, 40' x 75' | 106
20B | Single-Family Dwelling, 8-Pack | 64
20C | Single-Family Dwelling, (43', 47', 50') x 00' | 65
21 | Single-Family Dwelling, (42', 45') x 90 | 109
Total 700
Area | Acres
Park | 17.4 AC
School | 7.7 AC
Commercial | 12.4 AC
Rio Wrangler East
(Planning Areas 23 to 26)
Village | Product | Units
23A | Single-Family Dwelling, 65' x 100' | 71
23B | Single-Family Dwelling, 60' x 100' | 89
24 | Single-Family Dwelling, 65' x 100' | 88
25 | Single-Family Dwelling, 60' x 100' | 75
26A | Single-Family Dwelling, 60' x 100' | 86
26B | Single-Family Dwelling, 70' x 100' | 49
Total 458
Area | Acres
Park | 5.1 AC
Talus Valley
Totals
2,993 Total Dwelling Units
19.1 Acres Commercial
52.5 Acres Schools
32.5 Acres Parks
344.2 Acres Greenways and Open Space
WOOD RODGERS
BUILDING RELATIONSHIPS ONE PROJECT AT A TIME
1361 Corporate Boulevard
Reno, NV 89502
Tel: 775.823.4066
Fax: 775.823.4066
TALUS
VALLEY
NORTH

Issues and Perspectives

Enhancing and Restoring Habitat for the Desert Tortoise *Gopherus agassizii*

Scott R. Abella,* Kristin H. Berry

S.R. Abella
University of Nevada Las Vegas, School of Life Sciences, Las Vegas, Nevada 89154-4004; and Natural Resource Conservation LLC, 1400 Colorado Street, Boulder City, Nevada 89005

K.H. Berry
U.S. Geological Survey, Western Ecological Research Center, 21803 Cactus Avenue, Suite F, Riverside, California 92518

Abstract

Habitat has changed unfavorably during the past 150 y for the desert tortoise *Gopherus agassizii,* a federally threatened species with declining populations in the Mojave Desert and western Sonoran Desert. To support recovery efforts, we synthesized published information on relationships of desert tortoises with three habitat features (cover sites, forage, and soil) and candidate management practices for improving these features for tortoises. In addition to their role in soil health and facilitating recruitment of annual forage plants, shrubs are used by desert tortoises for cover and as sites for burrows. Outplanting greenhouse-grown seedlings, protected from herbivory, has successfully restored (>50% survival) a variety of shrubs on disturbed desert soils. Additionally, salvaging and reapplying topsoil using effective techniques is among the more ecologically beneficial ways to initiate plant recovery after severe disturbance. Through differences in biochemical composition and digestibility, some plant species provide better-quality forage than others. Desert tortoises selectively forage on particular annual and herbaceous perennial species (e.g., legumes), and forage selection shifts during the year as different plants grow or mature. Nonnative grasses provide low-quality forage and contribute fuel to spreading wildfires, which damage or kill shrubs that tortoises use for cover. Maintaining a diverse "menu" of native annual forbs and decreasing nonnative grasses are priorities for restoring most desert tortoise habitats. Reducing herbivory by nonnative animals, carefully timing herbicide applications, and strategically augmenting annual forage plants via seeding show promise for improving tortoise forage quality. Roads, another disturbance, negatively affect habitat in numerous ways (e.g., compacting soil, altering hydrology). Techniques such as recontouring road berms to reestablish drainage patterns, vertical mulching ("planting" dead plant material), and creating barriers to prevent trespasses can assist natural recovery on decommissioned backcountry roads. Most habitat enhancement efforts to date have focused on only one factor at a time (e.g., providing fencing) and have not included proactive restoration activities (e.g., planting native species on disturbed soils). A research and management priority in recovering desert tortoise habitats is implementing an integrated set of restorative habitat enhancements (e.g., reducing nonnative plants, improving forage quality, augmenting native perennial plants, and ameliorating altered hydrology) and monitoring short- and long-term indicators of habitat condition and the responses of desert tortoises to habitat restoration.

Keywords: annual plants; burrow; disturbance; forage; grazing; restoration; revegetation

Received: May 18, 2015; Accepted: February 23, 2016; Published Online Early: June 2016; Published: June 2016

Citation: Abella SR, Berry KH. 2016. Enhancing and restoring habitat for the desert tortoise *Gopherus agassizii*. Journal of Fish and Wildlife Management 7(1):xx–xx; e1944-687X. doi: 10.3996/052015-JFWM-046

* Corresponding author: scott.abella@unlv.edu

USGS
science for a changing world

49.RS-3

Desert Tortoise Annotated Bibliography, 1991–2015

Open-File Report 2016–1023

U.S. Department of the Interior
U.S. Geological Survey

Contents

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Population Trends in Mojave Desert Tortoises (*Gopherus agassizii*)

Linda J. Allison[1,3] and Ann M. McLuckie[2]

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[2]*Utah Division of Wildlife Resources, Washington County Field Office, 451 N SR-318, Hurricane, Utah 84737, USA*
[3]*Corresponding author, email: linda_allison@fws.gov*

***Abstract.*—Populations of the Mojave Desert Tortoise (*Gopherus agassizii*) experienced severe declines in abundance in the decades leading up to 1990, when the species was listed as threatened under the U.S. Endangered Species Act. Population responses to recovery efforts have not been well documented because of the difficulties of studying this low-density, cryptic species over a time period appropriate to its long generation time. We used line distance sampling to estimate annual adult densities since 1999 in Utah and since 2004 elsewhere in the range of Mojave Desert Tortoises. We used generalized least squares regression on log-transformed adult tortoise densities to estimate annual percentage change through 2014 in each of 17 Tortoise Conservation Areas (TCAs) in the five recovery units. We report annual proportional increases in density of adults in the Northeastern Mojave Recovery Unit, but declines in the other four recovery units. Adjusting these densities and trends for the area of potential habitat in each recovery unit, we estimated that in 2004 there were 336,393 adult tortoises (standard error [SE] = 51,596), with an overall loss of 124,050 adult tortoises (SE = 36,062) by 2014. The proportion of juveniles in our surveys has been decreasing in all five recovery units since 2007. Prevailing declines in the abundance of adults overall and in four of the five recovery units indicate the need for more aggressive implementation of recovery actions and more critical evaluation of the suite of future activities and projects in tortoise habitat that may exacerbate ongoing population declines.**

Key Words.—Colorado Desert; distance sampling; information theory; long-term monitoring; Mojave Desert; species recovery

Introduction

Turtles around the world face the highest level of endangerment of any vertebrate lineage today (Stanford et al. 2018). Historical extinctions and recent crises have characterized species on islands or with relatively localized and easily exploitable populations (Stanford et al. 2018). However, turtles as a group are vulnerable in part due to their shared life histories based on high adult survival, delayed age at first reproduction, and low rates of juvenile recruitment (Congdon et al. 1993; Stanford et al. 2018). Even tortoises with relatively large historical ranges are susceptible to threats with relatively small effects, in combination and acting over long generation times, and this life-history strategy also diminishes their ability to recovery quickly from population losses.

Populations of the Desert Tortoise (*Gopherus agassizii*, *sensu stricto*) experienced severe declines in abundance in the decades leading up to 1990, when populations in the Mojave and Colorado deserts west and north of the Colorado River were listed as Threatened under the U.S. Endangered Species Act (U.S. Fish and Wildlife Service [USFWS]1990). Murphy et al. (2011) split the full species into two: the Mojave Desert Tortoise (*Gopherus agassizii*) occupying the range north and west of the Colorado River (the same area listed as Threatened above and retaining this listing) and the Sonoran Desert Tortoise (*G. morafkai*) south and east of the Colorado River. Population responses to recovery efforts for *G. agassizii* have not been well documented, in part, because of the difficulties of studying this low-density, long-lived species. The current recovery plan (USFWS 2011) designates five recovery units for *G. agassizii* that are intended to conserve genetic, behavioral, and morphological diversity necessary for the long-term recovery of the entire listed species (Fig. 1). The recovery plan also defines criteria that form the basis for decisions about continued listing status. For instance, rates of population change of *G. agassizii* should be increasing for at least one tortoise generation (25 y) in all recovery units to warrant delisting (USFWS 2011).

Whereas *G. agassizii* (*sensu stricto*) were initially protected on the basis of population declines estimated on a limited number of small, selectively located mark-recapture study plots, over the longer term, status descriptions should be based on more extensive and rigorous population estimates (Tracy, R.C., R. Averill-Murray, W.I. Boarman, D. Delehanty, J. Heaton, E. McCoy, D. Morafka, K. Nussear, B. Hagerty, and

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Notes on Models of Carbon Dynamics for the California Deserts

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Production of organic Carbon ($C_{organic}$) is generally low in hot desert ecosystems. Net primary production in the Mojave desert generally ranges from 10 to 30gC/m^2/y (Rundel and Gibson 1996), with a pool of 0.9 to 1.1kgC/m^2 (Evans et al. 2014). Photosynthesis is limited by temperature and moisture, and decomposition can remain high. Q_{10} values for RuBP Carboxylase is generally credited as a bit over 2 for ten degree increments between 10 and 40^{o}C. Above 30^{o}C, rates of photosynthesis decline rapidly. In deserts, however, soil respiration rates indicative of enzymatic activity can remain high up to 60 to 70^{o}C (Cable et al. 2011). For this reason, C in desert ecosystems has been overlooked or even criticized as a crucial element in global and regional models.

Importantly, there are reports of very high rates of net ecosystem exchange of C (e.g., Xie et al. 2009, Wohlfahrt et al. 2008). These have been criticized as being unreasonable (Schlesinger and Amundson 2019), but no one has provided an alternative explanation for the measured values. While scientists continue to study the patterns and mechanisms of $C_{organic}$ in deserts, we know that California deserts have been accumulating inorganic C ($C_{inorganic}$) for millennia (Schlesinger 1986). While some measurements of the rates of input are controversial, including localized, temporal values equal to those of forest ecosystems (e.g., Schlesinger et al. 2009, Schlesinger and Amundson 2019), ***a large pool of stored C has the potential to be lost through anthropogenic disturbance and exposure***. The mechanisms of C dynamics in desert ecosystems are outlined here with a focus on southern California.

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Xie, J. X., Y. Li, C. X. Zhai, C. H. Li, and Z. D. Lan. 2009. CO2 absorption by alkaline soils and its implication to the global carbon cycle. Environmental Geology **56**:953-961.

What is Caliche?

Caliche is a layer of calcium carbonate ($CaCO_3$) formed between the soil surface, and accumulating at the depth to which water will percolate carrying calcium (Ca) and to which roots will respire CO_2. CO_2 from respiring roots and microorganisms, plus atmospheric CO_2, dissolves in rainwater forming bicarbonate HCO_3^- and hydrogen ions (H^+). Using the free Ca, the equilibrium reaction results in $CaCO_3$, and the $CaCO_3$ crystals precipitate, until the next storm, when the reaction reoccurs and percolates the dissolved $CaCO_3$ in solution down to that storm's depth.

Caliche forms in bajadas below mountains comprised of high concentrations of Ca, particularly basalts (mineral CaO) and silicates ($CaSiO_3$) and limestone $CaCO_3$ formed under the oceans and pushed up geologically, along with its derivatives, dolomite (with added Mg) and marble, limestone's metamorphic derivative. Weathering of well-known mountain ranges, including the Alps and the Himalayas, yields Ca. When in semi-arid to arid regions, deep layering of $CaCO_3$ forms, such as in most of Mediterranean Europe, and the deserts of the southwestern US and northwestern Mexico. As much C in the form of CO_3 is sequestered in arid to semiarid soils as in plant organic C mass globally, and there remains a large "missing sink of C" somewhere in terrestrial ecosystems.

Despite the large amount of $CaCO_3$ sequestered over the past several thousand years, three assumptions contribute to a view among decision-makers that this C can be ignored in the quest to understand C fluxes between the biosphere and the atmosphere. These are three assumptions that pose serious limitations to global carbon modeling and are at least contributors to the large gaps remaining in closing the global C models. These are: (1) $CaCO_3$ is patchily distributed globally and not easily mapped, (2) that the processes are geological and, because the dominant form is inorganic ($CaCO_3$), it is a geological and not biological process. Therefore, no accounting need be undertaken using ecosystem models. And (3), there is an assumption that the rates of transformations and loss are on a geological time scale and not relevant to global change models.

Given that approximately 40% of the increase in atmospheric CO_2 driving global climate change is due to land use change (compared with 60% from fossil fuel burning), it is critical to understand the nature of the largest single terrestrial C pool, especially since much of it is in desert ecosystems.

of oxalic acid rests not only in and of itself, nor its role in P (phosphorus) nutrition of plants (Jurinak et al. 1986), but in an ability to lead to $CaCO_3$, or caliche accumulation (discussed below).

Garvie, L.A.J. 2006. Decay of cacti and carbon cycling. *Naturwissenschaften* **93,** 114–118. https://doi.org/10.1007/s00114-005-0069-7

It is important to get a better handle on the C distributions and exchanges of both organic and biologically-derived inorganic forms. ***Clearly more extensive surveys of desert C are needed to know how much is actually sequestered.***

2) Do the processes occur only in geologic time scales and, because the dominant form is inorganic ($CaCO_3$), can we ignore this sequestered carbon because it is a geological and not a biological process? In essence, what is the time scale?

Bioweathering by fungi and lichens, and even by many plants, commonly occurs initially in the California desert mountains, resulting in a source of Ca downslope to the bajadas. The biogeochemical pathways provide for a continuous dance between Ca and atmospheric CO_2 across the landscape from the mountain tops to the desert floor, where C is biotically converted to a form, $CaCO_3$ that can be sequestered. However, this form also can be rapidly weathered upon exposure.

The BioGeoChemical Pathways for Biologically-derived Inorganic C.

1) CO_2 (atmospheric) -> $C_6H_{12}O_6$ (photosynthesis): plants, lichen algae, cyanobacteria
2) $C_6H_{12}O_6 + O_2$ -> $H_2C_2O_4$ (bioweathering): lichen fungi, plants, mycorrhizal fungi
3) $Ca + H_2C_2O_4$ -> CaC_2O_4 (calcium oxalate production): desert crusts, rhizosphere, mycorrhizosphere
4) CaC_2O_4 ->$Ca + CO_2$ (C source, degradation): bacteria, fungal exoenzymes
5) $CO_2 + H_2O$ -> HCO_3^- (bicarbonate formation): root and microbial respired CO_2
6) $Ca + HCO_3^-$ (in solution) <-> **$CaCO_3$** + H^+

As the soils dry, the $CaCO_3$ precipitates, and upon layering, creates a caliche layer.

7) If exposed, with rainfall, $CaCO_3 + H^+ + O_2$ <-> $CO_2 + H_2O + Ca$
8) $Ca + HPO_4^-$ -> $CaPO_4$, $CaSO_4$ (gypsum)

   cycle back to step 1 and step 4.

Description of Steps: It is important to remember that equilibrium does not equal stasis. Each time $CaCO_3$ goes into solution, some of the $CaCO_3$ dissolves into $Ca + CO_2 + H^+$, with a potential for CO_2 to be released back to the atmosphere. This is a

mechanism whereby Ca moves from the mountains into the bajada, and then deeper into the bajada.

1) CO_2 (atmospheric) -> $C_6H_{12}O_6$, or $C_{organic}$ (photosynthesis): plants, lichen algae, cyanobacteria

Photosynthesis and primary production is well understood, and I will not further elaborate. However, it is important to note that photosynthesis is carried on from the tops of desert mountains to the desert floors in plants and desert crusts. These sources of organic C inputs should never be ignored.

2) $C_6H_{12}O_6 + O_2$ -> $H_2C_2O_4$ (bioweathering): lichen fungi, plants, mycorrhizal fungi

Fungi and bacteria produce oxalic acid, among others including citric acid, carbonic acid, and nitric acid. These acids, especially oxalic acid, in particular, allow the fungi of lichens and the mycorrhizal fungi of plants to acquire P from etched rock surfaces (e.g., Gadd et al. 2014).

Gadd, G.M. et al. 2014. Oxalate production by fungi: significance in geomycology, biodeterioration and bioremediation. Fungal Biology Reviews 28: 36-55. https://doi.org/10.1016/j.fbr.2014.05.001.

3) Ca + $H_2C_2O_4$ -> CaC_2O_4 (calcium oxalate production): desert crusts, rhizosphere, mycorrhizosphere

Once arriving at the bajada, oxalic acid is also produced by a wide variety of organisms. Cacti produce high concentrations (Franceschi and Nakata 2005). Many of the fungi in desert crust lichens, but also other biotic crusts produce them. Ectomycorrhizal fungi, such as associated with oaks and pines, produce these acids (e.g., Allen et al. 1996) and even the arbuscular mycorrhizal fungi, formed with the majority of desert perennial plants, form Ca-oxalates as a mechanism, when combined with increasing CO_2 respired within the mycorrhizosphere, to obtain limiting P (Jurinak et al. 1986, Knight et al. 1989).

Allen, M.F. C. Figueroa, B.S. Weinbaum, S.B. Barlow, and E.B. Allen. 1996. Differential production of oxalates by mycorrhizal fungi in arid ecosystems. Biology and Fertility of Soils 22: 287-292.

Franceschi, V.R. and P.A. Nakata. 2005. Calcium oxalate in plants: formation and function. Annual Review of Plant Biology 56: 41-71.

Jurinak, J.J., L.M. Dudley, M.F. Allen & W.G. Knight. 1986. The role of calcium oxalate in the availability of phosphorus in soils of semiarid regions: a thermodynamic study. Soil Science 142:255-261.

Knight, W.G., M.F. Allen, J.J. Jurinak and L.M. Dudley. 1989. Elevated carbon dioxide and solution phosphorus in soil with vesicular-arbuscular mycorrhizal western wheatgrass. Soil Science Society of America Journal 53: 1075-1082.

4) CaC_2O_4 ->Ca + CO_2 (C source, degradation): bacteria, fungal exoenzymes. Once Ca-oxalate is formed, like any organic material, there are both fungi and bacteria awaiting to use it as a carbon source (Morris and Allen 1994, Gadd et al. 2014).

Morris, S.J. and M.F. Allen. 1994. Oxalate metabilizing microorganisms in sagebrush steppe soils. Biology and Fertility of Soils 18: 255-259.

5) CO_2 + H_2O -> HCO_3^- (bicarbonate): root and microbial respired CO_2

Once rainwater or groundwater reaches the location where respiration occurs, whether from roots or microbes, bicarbonate is formed. This can be in the surface, or tens of meters deep (see model discussion below). It is important to note that while atmospheric CO_2 is increasing (from 310ppm in 1950 to 410 today), soil CO_2 can be many thousands of ppm, and we have measured over 2,500ppm at the Boyd Deep Canyon Reserve (see below).

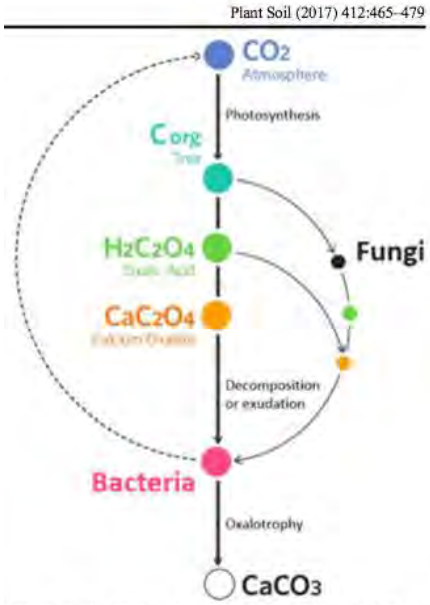


Fig. 1 A simplified model of the Oxalate-Carbonate Pathway (OCP), a process that transfers carbon dioxide from atmosphere to secondary calcium carbonate. As described by Cailleau et al. (2014), the process commences when a calcium oxalate producing species (Tree) organically sequesters carbon during photosynthesis (Corg), converting it into oxalic acid and then calcium oxalate. Once released from organic material during decomposition or as exudes, calcium oxalate is subsequently catabolised by oxalotrophic bacteria (Bact.), converting one mol as carbonate and releasing another as respired carbon dioxide. Fungi also assist in the process by either breaking down oxalic rich matter and depositing calcium oxalate for catabolism by bacteria, or by fungal oxalotrophy

6) Ca + HCO_3^- (in solution) <-> ***$CaCO_3$*** + H^+

The critical step in Carbon Sequestration!

In a comprehensive synthesis, Mike Rowley, in Lausanne, Switzerland, and his colleagues showed that the Ca-oxalate pathway concentrates Ca temporally and spatially, where C is sequestered through oxalotrophy through free Ca coupled with the high concentrations of HCO_3^-, forming $CaCO_3$ (Figure 2).

Figure 2. A model showing biotically-controlled CO_2 sequestration focused on the Yucatán Peninsula, from Rowley et al. 2017.

Rowley, M.C., H. Estrada-Medina, M. Tzec-Gamboa et al. 2017. Moving carbon between spheres, the potential oxalate-carbonate pathway of Brosimum alicastrum Sw.; Moraceae. *Plant and Soil 412*: 465-479.

Time Scales:

In our efforts to better understand the time scales of C dynamics, we undertook two types of studies. First, we analyzed the $\delta^{18}O$ signals (Delta-Oxygen-18 is an indication of groundwater/mineral interactions) of caliche across the Coachella Valley. These values showed that caliche was dynamic (Allen et al. 2013). This

conclusion was collaborated by a subsequent study in the Mojave desert (Mills et al. 2020).

At Deep Canyon, my research group further re-ran the SLIC model (see model discussion below) using our empirical CO_2 sensor data to determine the $CaCO_3$ in solution (Allen et al. 2013, Swanson 2017, Swanson et al. in preparation). Importantly, soil CO_2 can reach as high as 2,500ppm, as compared with atmospheric CO_2 of 395ppm (during the measurements), as soil respiration increased following precipitation events. $CaCO_3$ in solution tracked the CO_2 and H_2O. As soils dried out, some of the $CaCO_3$ in solution again precipitated forming new caliche deeper in the profile. However, eddy covariance measurements show a large CO_2 flux from both undisturbed soils and from sites with no measureable organic C (Allen et al. 2013, Swanson 2017).

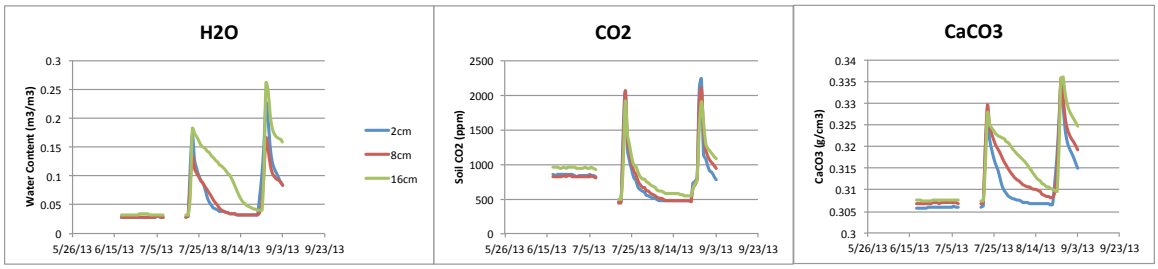


Figure 3. Daily time scales of soil water, CO_2 and modeled solution $CaCO_3$ (SLIC model) following a precipitation event at Boyd Deep Canyon in July through September of 2013 (Allen et al. 2013, Swanson 2017).

Allen, M. F., G. D. Jenerette, L. S. Santiago. 2013. Carbon Balance in California Deserts: Impacts of Widespread Solar Power Generation. California Energy Commission. Publication number: CEC-500-2013-063.

Swanson, AC. 2017. Disturbance, Restoration, and Soil Carbon Dynamics in Desert and Tropical Ecosystems. PhD. Dissertation. University of California-Riverside.

7) If exposed, with rainfall, $CaCO_3 + H+ + O_2 <-> CO_2 + H_2O + Ca$

$\delta^{18}O$ ratios show that in surface soils, $CaCO_3$ continually turns over (Allen et al. 2013, confirmed by Mills et al. 2020). We do not know where, or how much Ca is redistributed with erosion, but there is considerable wind erosion of Ca, especially as calcium sulphate (Frie et al. 2019).

Allen, M. F., G. D. Jenerette, L. S. Santiago. 2013. Carbon Balance in California Deserts: Impacts of Widespread Solar Power Generation. California Energy Commission. Publication number: CEC-500-2013-063.

Frie, A.L. A.C. Garrison, M. V. Schaefer, S. M. Bates, J. Botthoff, M. Maltz, S. C. Ying, T. Lyons, M. F. Allen, E. Aronson, and R. Bahreini. 2019. Dust Sources in the Salton Sea Basin: A Clear Case of an Anthropogenically Impacted Dust Budget.

Environmental Science & Technology 53 (16), 9378-9388 DOI: 10.1021/acs.est.9b02137

Mills, Jennifer, Laura Lammers, and Ronald Amundson. 2020. Carbon Balance with Renewable Energy: Effects of Solar Installations on Desert Soil Carbon Cycle. California Energy Commission. Publication Number: CEC-500-2020-075

8) Ca + HPO_4^- -> $CaPO_4$ (bound inorganic P, $CaSO_4$ (gypsum)

Even though in equilibrium, Ca tends to attach to -CO_3 but some can bind to phosphate or sulphate (forming gypsum), move in solution downstream, or even blow via wind erosion (Frie et al. 2019).

Frie, A, A Garrison, M Schaefer, S Bates, J Botthoff, M Maltz, S Ying, T Lyons, MF Allen, EL Aronson, R Bahreini. 2019. "Dust Sources in the Salton Sea Basin: A Clear Case of an Anthropogenically Impacted Dust Budget." Environmental Science & Technology. 53(16):9378-9388. doi: 10.1021/acs.est.9b02137.

(3) What we are missing is an overall synthesis of the rates of CO_2 exchange across the California deserts, both from landscape models, and from local validation measurements. These are crucial for a broad overview of C fluxes in the desert.

The Models: One modeling concept uses the assumption that the rates of transformations are on a geological time scale and not relevant to change models. These are the models that should be used and tested.

DayCENT: Parton, W. J., M. Hartman, D. Ojima, and D. Schimel. 1998. DAYCENT and its land surface submodel: description and testing. Global and Planetary Change 19:35–48.

The Century model was designed to estimate long-term soil C accumulation. DayCENT is a version of Century using a daily time-step to better understand short-term C dynamics. It is the most sophisticated model available appropriate to generate long-term understanding of soil C. But there are limitations that require a better incorporation of concepts described below and the data and model inputs specific to California's deserts.

Rao et al. 2010 used DayCENT for studying the impacts of Nitrogen deposition on Net Primary Productivity (NPP -or how much CO2 vegetation takes in during photosynthesis minus how much CO2 plants release during respiration) in deserts, mostly as related to fire. But there is one distinct limitation to the current generation of DayCENT models: the ability to access groundwater. During a year

1) How much and where is Carbon in California deserts?

Surface soil $CaCO_3$ is distributed widely, but in patches throughout the desert. In the surface layers, we can see, for example large swaths in the southern California (SoCal) deserts, where as much as 5% or more of the surface soil is $CaCO_3$ (Fig 1).

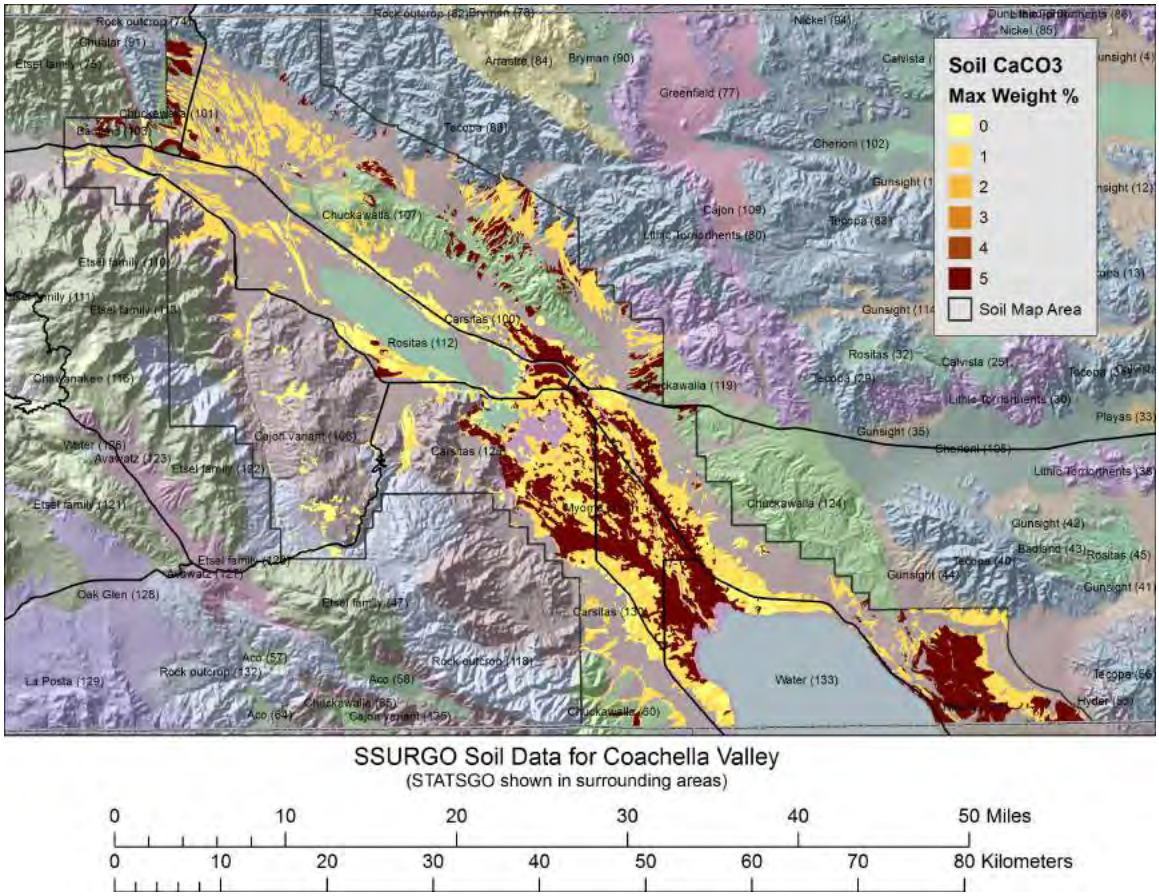


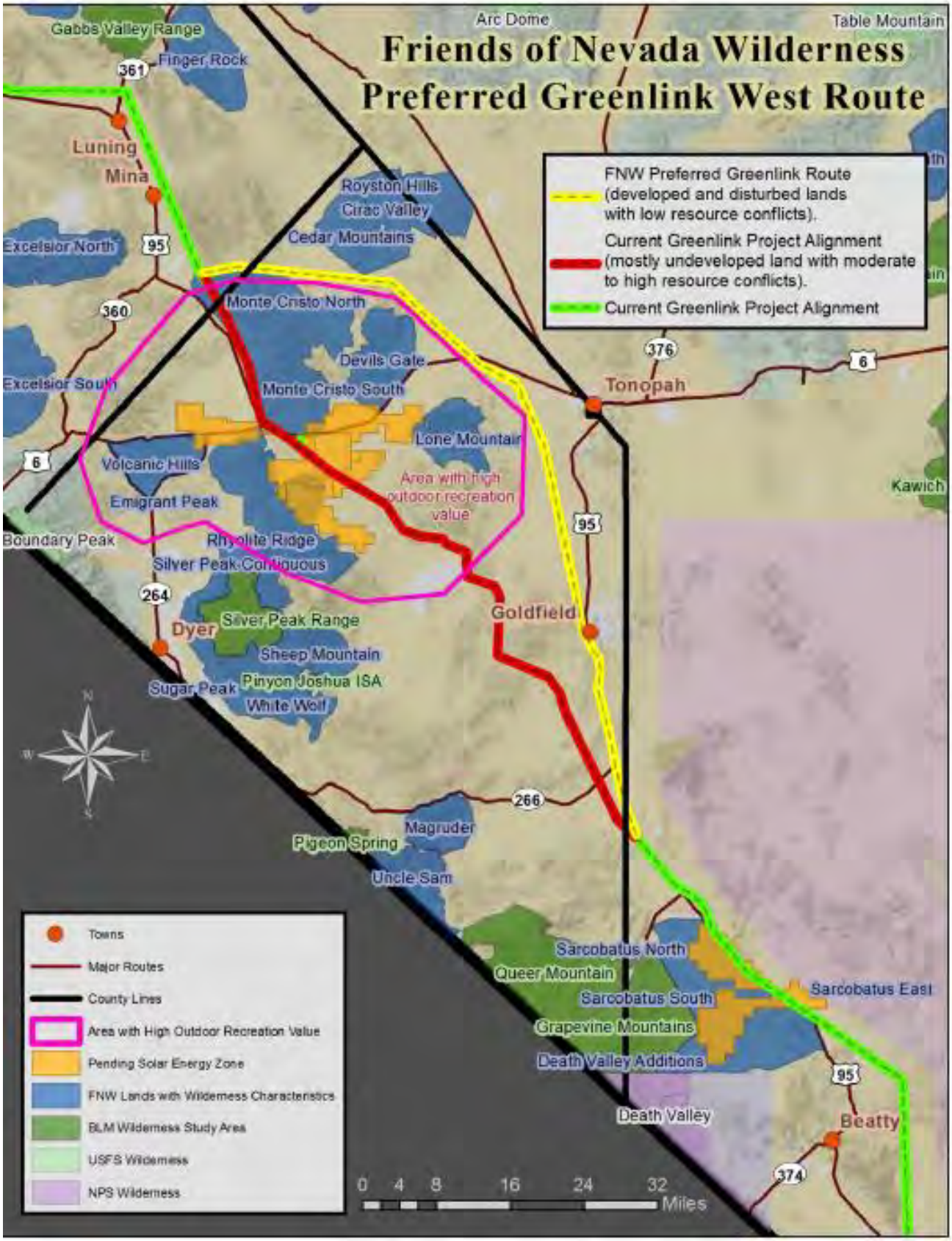
Figure 1. USDA NRS high resolution SSURGO map for surface soil $CaCO_3$, adding the STATSGO data for areas surrounding the Coachella Valley, information from (https://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/office/ssr12/tr/?cid=nrcs142p2_010596). Map created by the Center for Conservation Biology, UCR.

Schlesinger (1985) found that at depths in the Chuckwalla Valley of greater than a meter, as much as 12% was $CaCO_3$, or between 30 and 70kg/m^2 of $CaCO_3$; or between 4 and 8.4kg $C_{inorganic}$/m^2, or as much C as is stored in mixed grass prairie as soil organic C.

Schlesinger, W.H. 1985. The formation of caliche in soils of the Mojave Desert, California. *Geochimica et Cosmochimica Acta* 49: 57-66.

Other C forms may also be critical in desert ecosystems. Garvie (2006) reported an accumulation of 2.4g $C_{inorganic}$/m^2/y under saguaro cactus accumulating as much as 40g $C_{inorganic}$/m^2, through the production and release of oxalic acid. The importance

52.SN-2


Friends of Nevada Wilderness
Preferred Greenlink West Route
Arc Dome
Table Mountain
Gabbs Valley Range
Finger Rock
361
Luning
Mina
Royston Hills
Cirac Valley
Cedar Mountains
Excelsior North
95
360
Monte Cristo North
Devils Gate
Excelsior South
Monte Cristo South
376
6
Tonopah
Lone Mountain
Volcanic Hills
Area with high outdoor recreation value
Emigrant Peak
Kawich
Boundary Peak
Rhyolite Ridge
Silver Peak Contiguous
264
Goldfield
Dyer
Silver Peak Range
Sheep Mountain
Pinyon Joshua ISA
Sugar Peak
White Wolf
266
Magruder
Pigeon Spring
Uncle Sam
Sarcobatus North
Queer Mountain
Sarcobatus East
Sarcobatus South
Grapevine Mountains
Death Valley Additions
Death Valley
Beatty
374
FNW Preferred Greenlink Route (developed and disturbed lands with low resource conflicts).
Current Greenlink Project Alignment (mostly undeveloped land with moderate to high resource conflicts).
Current Greenlink Project Alignment
Towns
Major Routes
County Lines
Area with High Outdoor Recreation Value
Pending Solar Energy Zone
FNW Lands with Wilderness Characteristics
BLM Wilderness Study Area
USFS Wilderness
NPS Wilderness
0 4 8 16 24 32
Miles

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APPENDIX 1

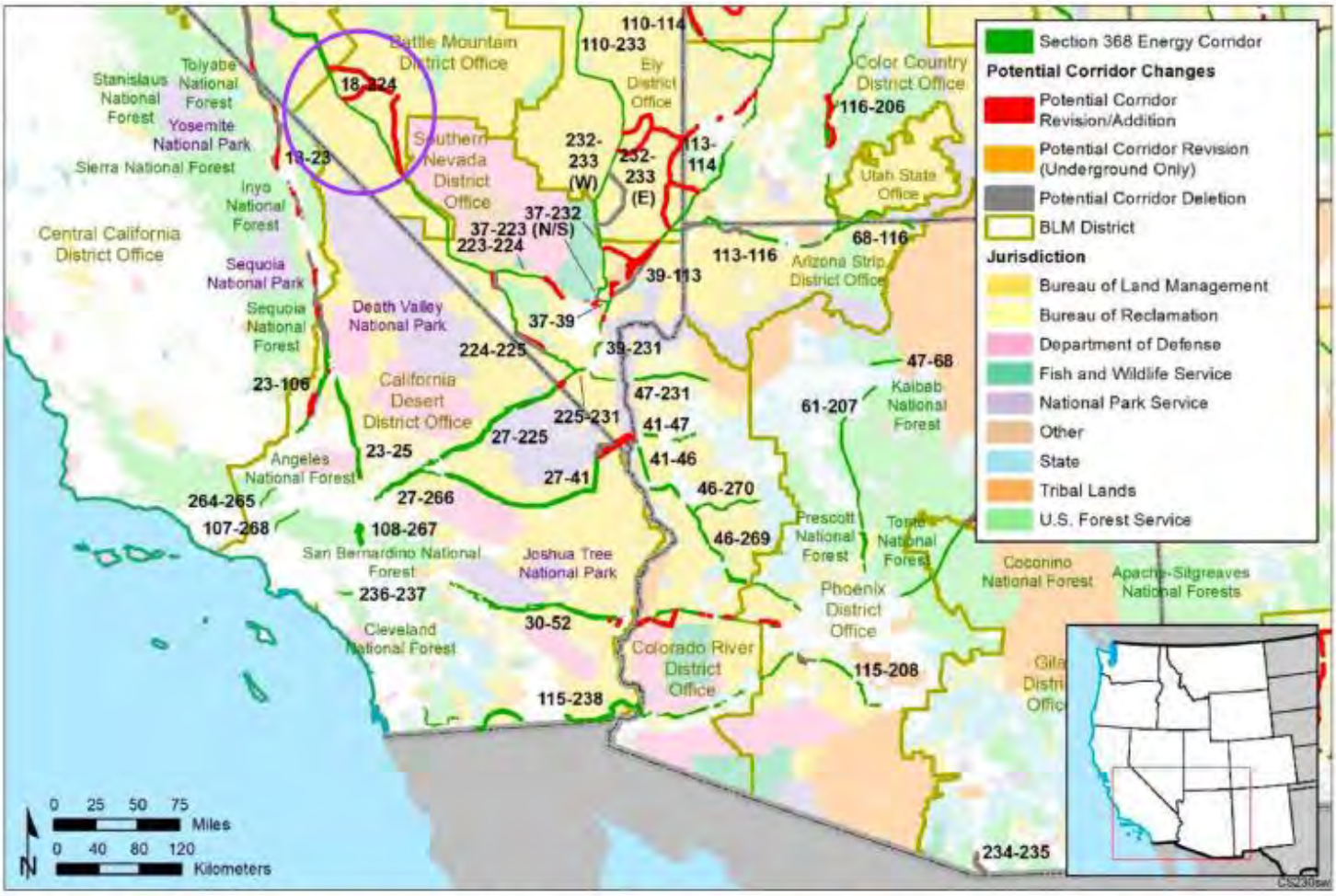


Figure 3-2 Recommended Revisions, Deletions, and Additions to Section 368 Energy Corridors

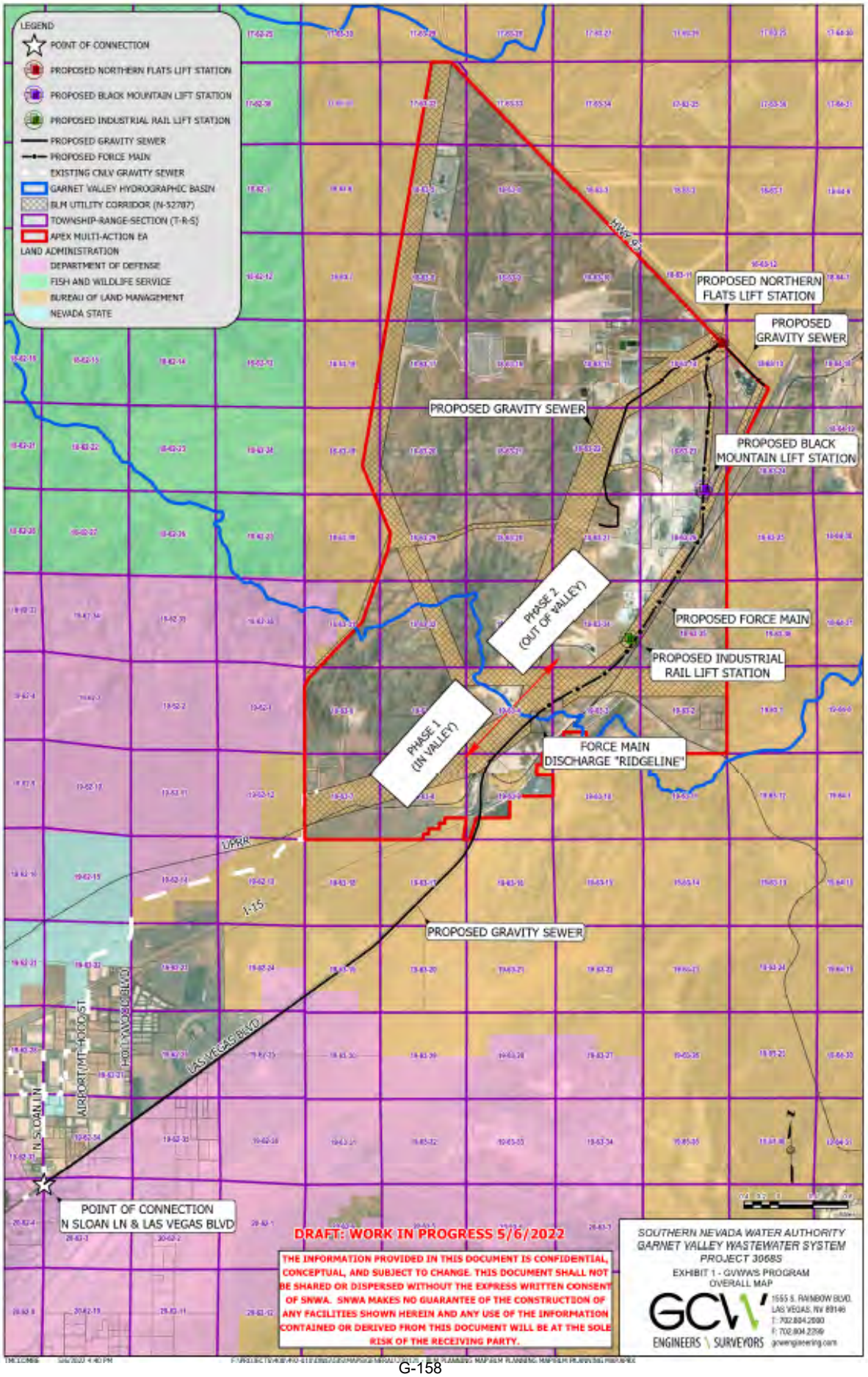
NEVADA 18-224

REVISION: Consider shifting corridor east at MP 106, following Highway 95 past Tonopah and Goldfield, and rejoining corridor at MP 165 to provide access to Millers solar energy zone (SEZ). Alternatively, consider shifting corridor east at MP 85 along existing transmission line to Highway 95 and south past Tonopah and Goldfield to provide access to Millers SEZ. During land use planning, consider the proposed Greenlink West Transmission Line Project route and proposed Interstate 11 Project route as a preferred pathway for future energy infrastructure.

RATIONAL: The recommended revisions would collocate with existing infrastructure and provide access to the Millers SEZ, facilitating solar energy development. If any proposed infrastructure (Greenlink West Transmission Line Project route or proposed Interstate 11 Project route) is approved and constructed in the future, the ROW for the new infrastructure would become a preferred route for energy transport, and the BLM and USFS should consider revising the corridor to align with that ROW.

April 2022 Energy Policy Act of 2005, Section 368 Energy Corridor Review: FINAL REPORT: REGIONS 1-6

53.HS-2


LEGEND
POINT OF CONNECTION
PROPOSED NORTHERN FLATS LIFT STATION
PROPOSED BLACK MOUNTAIN LIFT STATION
PROPOSED INDUSTRIAL RAIL LIFT STATION
PROPOSED GRAVITY SEWER
PROPOSED FORCE MAIN
EXISTING CNLV GRAVITY SEWER
GARNET VALLEY HYDROGRAPHIC BASIN
BLM UTILITY CORRIDOR (N-52787)
TOWNSHIP-RANGE-SECTION (T-R-S)
APEX MULTI-ACTION EA
LAND ADMINISTRATION
DEPARTMENT OF DEFENSE
FISH AND WILDLIFE SERVICE
BUREAU OF LAND MANAGEMENT
NEVADA STATE
PROPOSED NORTHERN FLATS LIFT STATION
PROPOSED GRAVITY SEWER
PROPOSED GRAVITY SEWER
PROPOSED BLACK MOUNTAIN LIFT STATION
PHASE 2 (OUT OF VALLEY)
PROPOSED FORCE MAIN
PROPOSED INDUSTRIAL RAIL LIFT STATION
PHASE 1 (IN VALLEY)
FORCE MAIN DISCHARGE "RIDGELINE"
UPRR
I-15
PROPOSED GRAVITY SEWER
LAS VEGAS BLVD
HOLLYWOOD BLVD
AIRPORT/MT HOOD ST
N SLOAN LN
POINT OF CONNECTION
N SLOAN LN & LAS VEGAS BLVD
DRAFT: WORK IN PROGRESS 5/6/2022
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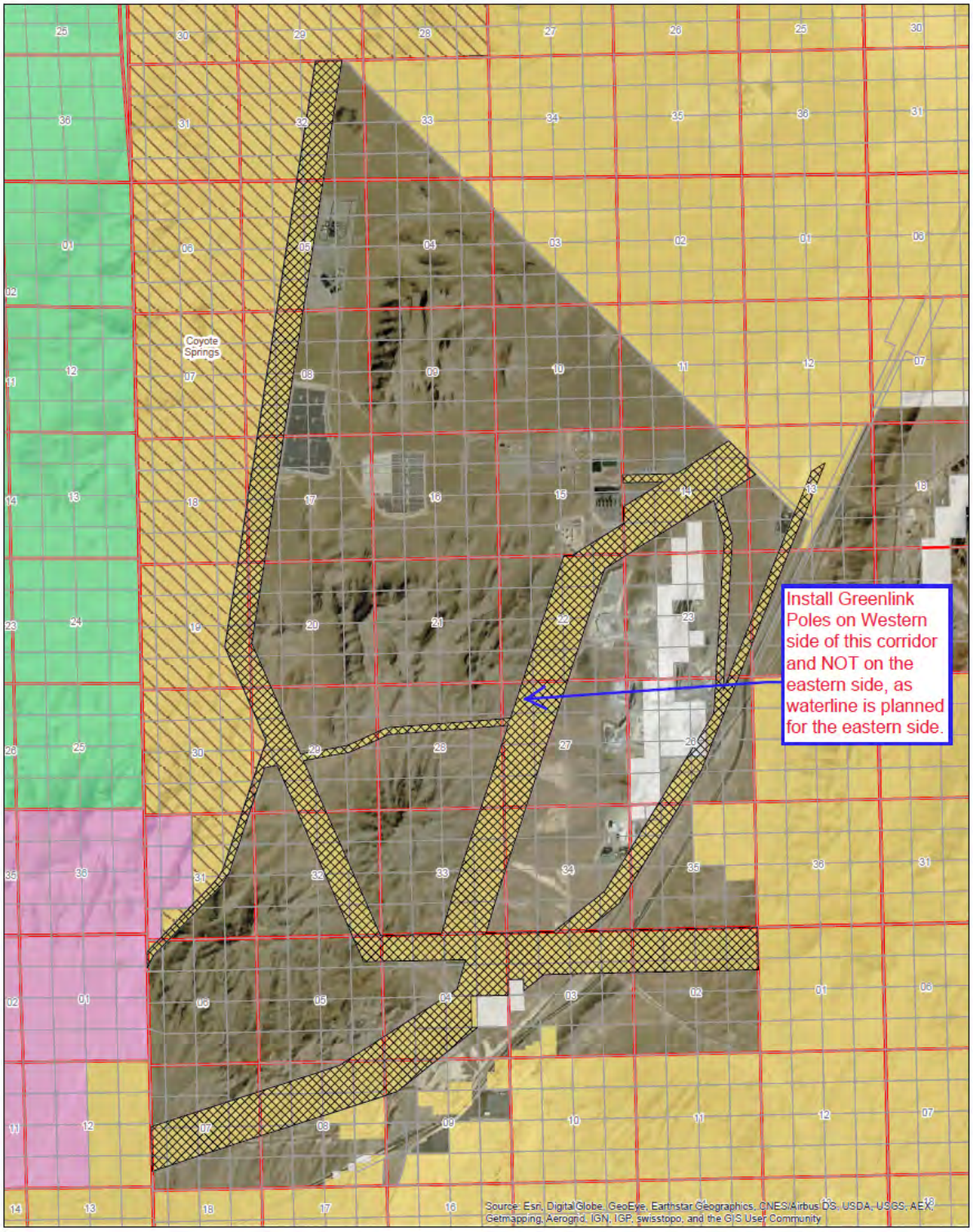
SOUTHERN NEVADA WATER AUTHORITY
GARNET VALLEY WASTEWATER SYSTEM
PROJECT 30685
EXHIBIT 1 - GVWWS PROGRAM OVERALL MAP
GCW ENGINEERS \ SURVEYORS
1555 S. RAINBOW BLVD.
LAS VEGAS, NV 89146
T: 702.804.2000
F: 702.804.2299
gcwengineering.com

61.LC-3

N-52787 - BLM Apex ROW Corridor



N
W E
S

0 0.75 1.5 Miles

Legend
BLM Apex ROW Corridor
Land Status
Bureau of Land Management
Clark County, NV
Department of Defense
Fish and Wildlife Service
Private
Citations

NATIONAL SYSTEM OF PUBLIC LANDS
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

No Warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

64.KF-3

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ANALYSIS OF CONNECTED ACTIONS UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT

PIM 2018-023
Permanent Instruction Memorandum

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
http://www.blm.gov

September 10, 2018

In Reply Refer To:
1610 (210) P

EMS TRANMISSION 09/14/2018
Permanent Instruction Memorandum No. 2018-023

To: All Assistant Directors, State Directors, and Center Directors

From: Assistant Director, Resources and Planning

Subject: Analysis of Connected Actions under the National Environmental Policy Act (NEPA)

Program Area: All Programs.

Purpose: This instruction memorandum (IM) transmits guidance on the analysis of connected actions in NEPA documents.

Administrative or Mission Related: Mission.

Policy/Action: The Bureau of Land Management (BLM) NEPA Handbook (H-1790-1) is under revision. Until the complete revision is published, the following text amends the existing handbook to clarify the definition and consideration of connected actions, consistent with current case law.

1. The following paragraphs revise BLM NEPA Handbook (H-1790-1) Section 6.5.2.1 (page numbers 45-48):

   Connected actions are those proposed Federal actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable.

   If the connected action is also a proposed BLM action, we recommend that you include both actions as aspects of a broader "proposal" (40 CFR 1508.23), analyzed in a single NEPA document. You may either construct an integrated purpose and need statement for both your proposed action and the connected action, or you may present separate purpose and need statements for your proposed action and the connected action. Regardless of the structure of the purpose and need statement(s), you must develop alternatives and mitigation measures for both actions (40 CFR 1508.25(b)), and analyze the direct, indirect, and cumulative effects of both actions (40 CFR 1508.25(c)).

   For example:

   > *The BLM proposes prescribed burning to attain desired vegetation characteristics. The BLM also proposes subsequent seeding of the same site to contribute to attaining those same desired vegetation characteristics, which is a connected action. We recommend that you include the prescribed burning and seeding as aspects of a broader proposal, analyzed in a single NEPA document.*

   If the connected action is an action proposed by another Federal agency, you may include both actions as aspects of a broader proposal analyzed in a single NEPA document, as described above. In making the determination to include both actions in a single NEPA document, evaluate whether a single NEPA document would improve the quality of analysis and efficiency of the NEPA process and provide a stronger basis for decision-making. Also, consider the timing of the other agency action and the capabilities of the other agency to act as a cooperating agency or joint lead agency (see sections **12.1 *Cooperating Agency Status in Development of NEPA Documents*** and **12.2 *Joint Lead Agencies in Development of NEPA Documents***).

   For example:

   > *The BLM proposes constructing a trail to provide recreation access to BLM-managed lands from a campground the Forest Service proposes to construct on adjacent Forest Service lands. The Forest Service campground construction is a connected action. You and the Forest Service may elect to include the BLM trail construction and the Forest Service campground construction as aspects*

of a broader proposal, analyzed in a single NEPA document, either as joint lead agencies, or with one agency as lead and the other as cooperating.

64.KF-3

If you do not include the connected action with your proposed action as aspects of a broader proposal analyzed in a single NEPA document, a separate NEPA document would need to be prepared for the connected action. It may be useful to incorporate by reference portions of the NEPA document for the connected action, if available, into the NEPA document for the proposed action. At a minimum, you must demonstrate that you have considered the connected action in the NEPA document for the proposed action (40 CFR 1508.25). That is, you must describe the connected action and its relationship to the proposed action, including the extent to which BLM decision-making on the proposed action may prevent or modify the connected action and its effects.

The NEPA process is focused on agency decision-making (40 CFR 1500.1(c), 40 CFR 1508.18, 40 CFR 1508.23). Therefore, a non-Federal action, even if "closely related" to a proposed BLM action, will not be a connected action pursuant to the Council on Environmental Quality regulations, because connected actions are limited to Federal actions. Rather, if the non-Federal action or its effects can be prevented or modified by BLM decision-making, then the effects of the non-Federal action are properly considered indirect effects of the BLM action and must be analyzed as effects of the BLM action (40 CFR 1508.7, 40 CFR 1508.25(c)) (see section **6.8.2, *Direct and Indirect Effects***). Effects of the non-Federal action that cannot be prevented or modified by BLM decision-making may still need to be analyzed in the cumulative effects analysis for the BLM action, if they have a cumulative effect together with the effects of the BLM action (see section **6.8.3 *Cumulative Effects***).

2. The following paragraphs revise BLM NEPA Handbook (H-1790-1) Section 7.3 on page number 73:

   Note that connected and cumulative actions are limited to Federal actions (see sections **6.5.2.1, *Connected Actions*** and **6.5.2.2, *Cumulative Actions***). Nevertheless, the effects of non-Federal actions may be indirect effects of the BLM proposed action if the other action and its effects can be prevented or modified by BLM decision-making on the proposed action (see section **6.8.2, *Direct and Indirect Effects***). If the effects of another action are properly considered an indirect effect of the BLM proposed action, the effects of the other action must be counted towards the significance of the BLM proposed action. For example:

   > *The BLM receives a right-of-way request for access for timber harvest on adjacent private land. Even though the timber harvest and the right-of-way request are interdependent parts, the timber harvest on private land would not be a connected action, because connected actions are limited to Federal actions (see section **6.5.2.1, Connected Actions**). Whether you count the effects of the timber harvest in determining the significance of the right-of-way grant would depend on whether the effects of the timber harvest could be prevented or modified by BLM decision-making (see section **6.5.2.1, Connected Actions**). In this example, that determination would likely depend on whether the private party has other reasonable access for timber harvest (see section **6.6.3, Alternatives Considered but Eliminated from Detailed Analysis** for discussion of "reasonable").*

   Alternatively, effects of non-Federal actions that cannot be prevented or modified by BLM decision-making on the proposed action may still need to be analyzed in the cumulative effects analysis for the BLM action (see section **6.8.3, *Cumulative Effects***).

3. The following paragraph revises the definition for connected action in the Glossary (page number 130) of the BLM NEPA Handbook (H-1790-1):

   connected action—those proposed Federal actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions, but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable.

Budget Impact: None.

Background: The BLM NEPA Handbook (H-1790-1) guides compliance with the NEPA, the Council on Environmental Quality's and the Department of the Interior's NEPA regulations (40 CFR Parts 1500-1508 and 43 CFR 46), and the Department of the Interior Departmental Manual Part 516 Chapter 11. The handbook is under revision to aid analysis and clarify the BLM's policies and procedures relating to its compliance with the NEPA. This IM is intended to clarify the BLM's policy relating to connected actions under the NEPA and to align that policy with recent federal case law about the scope of connected actions, pending publication of the full revision to the handbook.[1]

Pages of Manual/ Handbook Sections Affected: The BLM Handbook H-1790-1 (Rel. 1-1710) of 2008 is under revision. This IM amends page numbers 45-48, 73, and 130 pending publication of the full revision.

Instruction Memorandums Affected: None.

Coordination: This IM was coordinated with all Washington Office Directorates and with the Office of the Solicitor.

Contact: For further information, please contact Anthony Bobo, Acting Chief, Division of Decision Support, Planning and NEPA, (202) 912-7282.

Signed by:
Kristin Bail
Assistant Director
Resources and Planning

Authenticated by:
Robert M. Williams
Division of IT Business Resources,WO-850

1 Attachment

64.KF-3 1 - Redline of Revisions (5 pp)

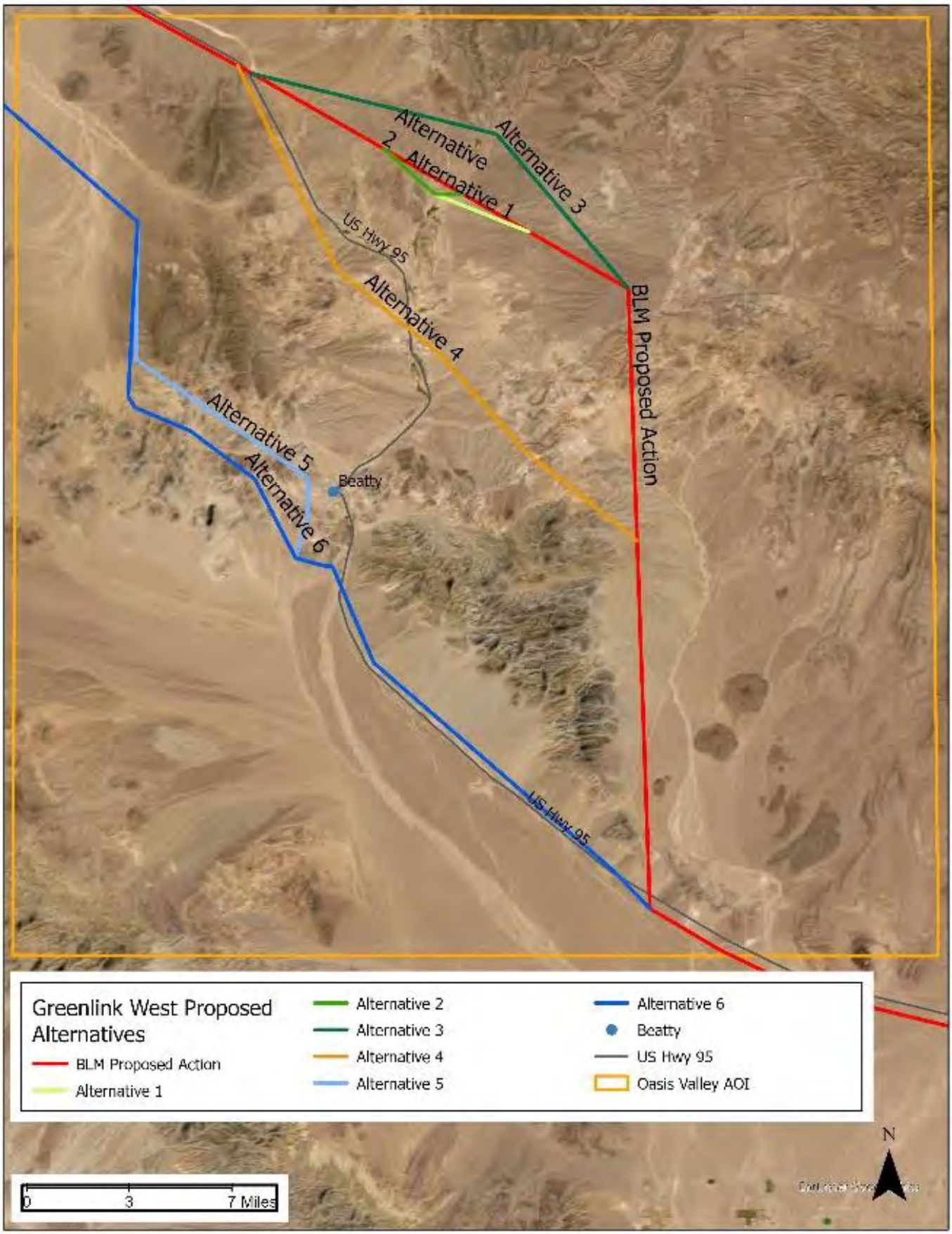
[1] See, e.g., *Big Bend Conservation Alliance v. FERC*, 2018 WL 3431729, *4 (D.C. Cir. 2018) ("The connected-actions doctrine does not require the aggregation of federal and non-federal actions"); *Sierra Club v. U.S. Army Corps of Eng'rs*, 803 F.3d 31, 49–50 (D.C. Cir. 2015) ("The point of the connected actions doctrine is to prevent the government from segmenting its own federal actions into separate projects . . . thereby failing to address the true scope and impact of the activities that should be under consideration") (internal quotations omitted); *Sierra Club v. BLM*, 786 F.3d 1219 (9th Cir. 2015) (upholding the BLM's determination that a wind energy project sited on private land and a BLM right-of-way authorization to access that project are not "connected actions" under NEPA).

ATTACHMENTS

PIM2018-023_ATT1.PDF (PDF / 316 KB)

FISCAL YEAR

2018


Alternative 2
Alternative 1
Alternative 3
US Hwy 95
Alternative 4
BLM Proposed Action
Alternative 5
Alternative 6
Beatty
US Hwy 95
Greenlink West Proposed Alternatives
BLM Proposed Action
Alternative 1
Alternative 2
Alternative 3
Alternative 4
Alternative 5
Alternative 6
Beatty
US Hwy 95
Oasis Valley AOI
N
0
3
7 Miles

74.PG-7 and 74.PG-13

Figure 3.5-20c. Recommended Revision to Corridor 18-224 (MP 85 to MP 160)