Ten West Link 500kV Transmission Line Project

BLM

Ten West Link 500kV Transmission Line Project

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Scoping Report

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Acronyms and Abbreviations

AGFD	Arizona Game and Fish Department
ASLD	Arizona State Land Department
BLM	Bureau of Land Management
CAISO	California Independent System Operator
CAP	Central Arizona Project
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
DPV	Devers to Palo Verde
DCRT	DCR Transmission, LLC
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
GHG	greenhouse gases
kV	kilovolt
LWC	lands with wilderness characteristics
NEPA	National Environmental Policy Act
NGO	non-governmental organization
NOI	Notice of Intent
NWR	National Wildlife Refuge
OHV	off-highway vehicle
RMP	Resource Management Plan
RMPA	Resource Management Plan Amendment
ROW	right-of-way
RPPA	Recreation and Public Purposes Act
RV	Recreational Vehicle
SERI	Species of Economic and Recreational Importance
SGCN	Species of Greatest Conservation Need
USFWS	U.S. Fish and Wildlife Service
WOTUS	Waters of the U.S
WWEC	West Wide Energy Corridor
YFO	Yuma Field Office
YPG	Yuma Proving Grounds

1.0 INTRODUCTION

1.1 PROJECT SUMMARY

DCR Transmission, LLC (DCRT) has filed a right-of-way (ROW) application with the Bureau of Land Management (BLM) that proposes to construct, operate, maintain, and decommission a proposed electric transmission project that would begin near Tonopah, Arizona and terminate near Blythe, California (**Figure 1-1**). The proposed Ten West Link 500kV Transmission Line Project (the Project) would consist of a 500 kilovolt (kV) transmission line traversing approximately 114 miles.

The lead agency for the Project is the BLM, Arizona has been designated the lead state, and the Yuma Field Office (YFO) is the lead office. Multiple decisions will be required for the Project. The decision regarding the proposed ROW grant on BLM land is the responsibility of the BLM Yuma Field Manager. However, inconsistency with visual management classes along certain portions of the proposed Project would require an amendment to the Yuma Resource Management Plan (RMP), in addition to the ROW grant. The BLM Arizona State Director will issue a separate, but related decision on the RMP amendment (RMPA). Because a portion of the Project would be in California, the California Public Utilities Commission (CPUC) is also required under the California Environmental Quality Act (CEQA) to issue its own decision on that portion of the Project within California. The CPUC will serve as a cooperating agency and will ensure that the EIS also meets the requirements of CEQA.

Because a ROW over public lands would be needed to complete the Project, the National Environmental Policy Act (NEPA) requires analysis of the entire transmission line route, including impacts to non-public lands. In order to comply with its requirements under NEPA, the BLM has determined that an Environmental Impact Statement (EIS) needs to be prepared for the Project, since it is a major federal action.

1.2 PURPOSE OF SCOPING

The process of scoping is used to determine the focus and content of the EIS. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the agency decisions to be made. The scoping process is not intended to resolve differences of opinion regarding the Project or evaluate its merits. Instead, the process ensures that all opinions and comments are collected and considered in the environmental analysis. Scoping is an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties.

Comments received during the scoping process are part of the public record, as documented in this scoping report. This report describes the strategy, methods, and techniques that were used to involve the public in scoping of the draft EIS (DEIS); and summarizes the input received from the general public, agencies, Native American tribes, and other interested parties prior to and during the scoping period.



1.3 PURPOSE AND NEED

1.3.1 Purpose of the BLM Action

The Secretary of the Interior is authorized to grant ROWs on public lands for systems of generation, transmission, and distribution of electric energy (Section 501[a][4]). The purpose of the BLM action is to respond to the ROW application for the proposed Project.

1.3.2 Need for BLM Action

FLPMA establishes the BLM's multiple-use mandate to serve present and future generations (BLM 2001). The mission of the BLM is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations. The BLM's multiple-use mission, set forth in FLPMA, mandates that the BLM manage public land resources for a variety of uses, such as energy development, livestock grazing, recreation, and timber harvesting, while protecting a wide array of natural, cultural, and historical resources (43 USC §1712).

Consequently, the need for the BLM action is established by the BLM's responsibility under FLPMA to respond to a request for a ROW grant while avoiding or minimizing adverse impacts to other resource values and to locate the uses in conformance with land use plans. FLPMA also requires that the BLM, "...develop, maintain, and when appropriate, revise land-use plans" (43 USC §1712). The BLM Land Use Planning Handbook (BLM 2005) states that RMPAs are prompted by consideration of a proposal or action that does not conform to the RMP, such as the ROW requested by DCRT. The BLM would amend the Yuma RMP per the guidance in the Handbook (BLM 2005) because portions of the proposed Project would be inconsistent with objectives for visual management set forth in the Yuma RMP, and possibly for the designation of a new corridor to accommodate the route.

1.3.3 CEQA Project Objectives

CEQA Guidelines Section 15124(b) requires a statement of Project objectives. DCRT's objectives are primarily driven by the need to provide additional high-voltage electrical transmission infrastructure to increase deliverability of energy supply, thereby increasing the efficiency of the transmission network. A secondary benefit is to improve the reliability of the bulk transmission grid between Arizona and California. The increase in supply would enhance competition among energy suppliers, which would reduce energy costs to customers over the life of the Project. Specifically, the Project would have the capacity to transport 3,200 megawatts, allowing for a cost-effective transfer of energy in the southwestern U.S. During the 2013 to 2014 Transmission Planning Process, the California Independent System Operator (CAISO) justified the need for the Project based on economic benefits associated with enhancing the high-voltage transmission path between the Delaney and Colorado River Substations (CAISO 2014). Although the Project was justified based on its economic benefits, the Project would also provide or increase:

• system economics (i.e., net benefits calculated from congestion/demand and costs to upgrade) for Arizona consumers;

- economic benefits in the form of increased taxes and business development;
- deliverability between Arizona and California;
- service reliability for Arizona and California consumers;
- operational flexibility for generation dispatch and renewable integration; and,
- interconnection capability of new renewable projects proposing to locate near the Project.

1.4 NEPA, COOPERATING AGENCIES, AND THE PUBLIC INVOLVEMENT PROCESS

NEPA requires an environmental review of major federal actions that have the potential to significantly affect the quality of the human and natural environment. One of the primary purposes of NEPA is to ensure that environmental considerations are incorporated into federal decision-making.

Several agencies are cooperating with the BLM on the NEPA process for the Project. At this point in the process, the following agencies are cooperating with the BLM – others will likely be added as the process moves forward:

- CPUC
- Environmental Protection Agency
- Department of Defense (DOD) (Yuma Proving Grounds [YPG])
- U.S. Fish and Wildlife Service (USFWS)
- Arizona Game and Fish Department (AGFD)
- Arizona State Land Department (ASLD)
- Maricopa Association of Governments
- La Paz County

In accordance with NEPA, the BLM solicited public comments during a formal 45-day scoping period from March 23 through May 9, 2016. The goal of public involvement is to gain public understanding and participation in the analysis and decision-making process regarding the Project. Comments provided during the scoping period (Section 2.0) were used to develop issues to be addressed in the EIS (Section 3.0) and were also used to refine and/or create alternatives to the Proposed Action that will be addressed in the EIS (BLM 2016 [*in development*]).

1.5 SCOPING PROCESS

1.5.1 Notice of Intent

The Notice of Intent to Prepare an EIS (NOI) was published in the *Federal Register*, Volume 81, No. 56, Page 15556 (**Appendix A**) on March 23, 2016. The publication of the NOI initiated the formal 45-day scoping period. The NOI complied with the requirements of 40 CFR 1508.22.

1.5.2 Project Website

A website for the Project was launched concurrently with publication of the NOI on March 23, 2016, and will remain active throughout the Project. The site is available via the BLM Arizona State Office website (www.blm.gov/az/st/en/prog/energy/10_west_link_transmission.html). Scoping information posted to the site includes the BLM media release, a description of the Project, maps, a blank public comment form, and contact information.

1.5.3 Legal Notice and Press Releases

Legal notices and/or advertisements informing the public about the scoping opportunity (**Appendix A**) for the Project were published in the following newspapers (**Table 1.5-1**):

PUBLICATION	DATE(S)
	April 2, 2016
Arizona Republic	April 8, 2016
	April 9, 2016
Viene See	April 1, 2016
Yuma Sun	April 8, 2016
Parker Pioneer	April 6, 2016
West Valley View	April 6, 2016
O statit Time	March 30, 2016
Quartzsite Times	April 6, 2016
	March 30, 2016
Palo Verde Times	April 6, 2016
	April 8, 2016
Desert Messenger	April 6, 2016

Table 1.5-1Newspaper Publications

1.5.4 Scoping Mailing

The BLM prepared scoping invitation letters that summarized the Project and proposed federal actions (**Appendix B**). The scoping invitation letters also included information on participating in the public involvement process, including information on public scoping meetings (**Section 1.6.5**). A letter and a detailed map were mailed to 778 potentially interested members of the public on March 31, 2016. A similar invitation letter was mailed to 219 interested agency and tribal representatives on March 30, 2016, providing the same information and an invitation to an agency-only scoping meeting (**Section 1.6.6**). The mailing list of potentially interested parties was compiled from several sources including mailing lists from prior projects located in the Project area; local field office mailing lists; DCRT outreach mailing lists and landowner mailing addresses along the proposed route based on tax assessor records; the CPUC consultation list; and independent research to discover local special interest groups. The mailing list also includes additional parties who might be interested in the Project such as adjacent land owners or land managers.

The mailing list will continue to be revised during the Project by adding parties who respond as a result of the legal notice, NOI, public meetings, website, and DEIS, or parties that request to be on the list.

Non-governmental organizations (NGO) or individual parties on the mailing list who do not respond during scoping will be removed from the list. The mailing list may also be reduced in size during the Project by parties who indicate they would like to be removed or will obtain future Project information via the Project website.

1.5.5 Scoping Email

In addition to the invitation letter mailing, the BLM prepared email notifications of both the agency-only scoping meeting and the public scoping meetings. The initial email notifying agencies of the agency-only scoping meeting was sent to 108 recipients on March 29, 2016 with a follow-up reminder on April 6, 2016 that was sent to 118 recipients. The email notifying the public of the public scoping meetings was sent to 101 recipients on March 30, 2016 with a follow-up reminder sent to 103 recipients on April 7, 2016 (Appendix B). The email address list was compiled during the compilation of the mailing list as described above.

1.5.6 Public Scoping Meetings

Three public scoping meetings were held to introduce the proposed Project and solicit feedback and comments:

- April 12, 2016: 5:30 PM to 8:00 PM, Ruth Fisher Elementary School, 38201 W. Indian School Road, Tonopah, Arizona
- April 13, 2016: 5:30 PM to 8:00 PM, Quartzsite Senior Center, 40 S. Moon Mountain Avenue, Quartzsite, Arizona
- April 14, 2016: 5:30 PM to 8:00 PM, Blythe Community Center, 445 N. Broadway, Blythe, California

The open house format meetings provided attendees with a handout that gave a description of the Project, an explanation of NEPA and CEQA processes, a map of the Project area, and a summary of the scoping effort (**Appendix C**). Posters were also used to describe the Project and to provide background information (**Appendix C**). Comment forms were available at the meetings (**Appendix C**). Representatives from the BLM and its contractors were present at each meeting to answer questions, discuss the Project, and accept public comments. In addition, representatives from DCRT were present to answer questions about the Project. There were 19 attendees at the Tonopah meeting, 16 attendees at the Quartzsite meeting, and 14 attendees at the Blythe meeting (**Appendix D**).

1.5.7 Agency Scoping Meeting

An agency-only scoping meeting was held on April 12, 2016, at the BLM National Training Center in Phoenix, Arizona, to solicit comments from tribal, federal, state, and local agencies with jurisdiction or interest in the Project. Twenty-five agency representatives were in attendance in addition to the BLM staff and its contactors, which included representatives from the Colorado River Indian Tribes, Quechan Tribe, Gila River Indian Community Tribal Historic Preservation, USFWS, U.S. Department of Energy/Western Area Power Administration, U.S. House of Representatives, ASLD, AGFD, Arizona State Parks, CPUC, California Department of Fish and Wildlife, and Maricopa County (**Appendix D**). In addition to introducing the Project to the agencies, resource information regarding the study area and potential issues were discussed. Agency representatives at the meeting were asked to provide comments formally during the scoping period.

1.5.8 Economic Strategies Workshop

An Economic Strategies Workshop will be held on June 14, 2016, in Quartzsite, Arizona. A separate report for the Economic Strategies Workshop and any resulting comments to be received will be prepared.

1.6 GOVERNMENT-TO-GOVERNMENT CONSULTATION

Efforts to initiate government-to-government consultation with Native American tribes with jurisdiction or interest in the Project are being undertaken. A separate summary of government-to-government consultation will be prepared at a later date and included in the Project's administrative record.

2.0 RESPONDENTS AND COMMENT ANALYSIS

2.1 COMMENT SUMMARY

Forty-four responses were received during the scoping period (**Appendix E**). Scoping comment format, respondent type, and comment origin are presented in the charts below. In summary, 16 percent (7) of comments were from non-governmental organizations (NGO), 34 percent (15) were from agencies, and 50 percent (22) were from individuals. The majority of comments originated in Arizona (57 percent), with five other states and Washington DC being represented.



Figure 2-1 Comment Format Chart



Figure 2-2 Respondent Type Chart



Figure 2-3 Comment Origin Chart

Each response was assigned a letter number (regardless of comment format), scanned, and filed in electronic and hard copy format. A working copy was printed for comment coding. This process, with embedded quality control procedures, ensured that all scoping responses to the Project were accounted for, without duplication, and transitioned to the coding phase of the process.

Each response was individually read and coded to ensure that individual comments were identified. Coding consists of identifying discrete comments, delineating them, and assigning resource comment codes. Individual comments are identified numerically (x.y), with x indicating the response number and y indicating the consecutive comments within that letter (**Appendix E**). Comments are summarized by resource topic below and include citations to responses and comment numbers for reference. The comment summaries were paraphrased from the original comments to convey the content of multiple similar comments. Comments made will be analyzed and determined as to how they will be used in the DEIS.

2.2 GENERAL COMMENTS

- Support for the proposed Project. (2.1, 15.1, 24.23, 34.1, 36.1)
- Statement that the Project would expand regional access to low cost, environmentally friendly energy. (34.5)
- Questioning whether the BLM can authorize ROWs in designated wilderness areas. (32.10)

- Questioning whether BLM guidance gives preference to the need for renewable and nonrenewable resources over the responsibility to protect natural, cultural, and visual resources. There is a general concern that transmission lines on public lands threaten wildlife, impact cultural resources and landscapes, impact visual resources, damage small communities, and create health hazards for nearby residents. (33.1, 33.4, 33.5)
- Concern that the proposed Project would disproportionately affect county jurisdictions. (24.10, 24.22)
- Statement that this Project demands especially thorough review under NEPA and state line-siting regulations because it would impact areas of high conservation value, including the NWR and public lands containing important wildlife habitat and other resources. (28.1)
- Concern that the BLM lets private industry influence their decisions. (38.4)

2.3 NEPA PROCESS

- Making sure the DEIS includes a "hard look" at all potentially affected resources. (16.22, 28.2, 28.12, 28.13)
- Concern that there has not been enough information provided to the public or the information provided is hard to understand. (2.2, 3.1, 33.16, 33.6)
- Ensuring that the BLM is responsible for determining whether the applicant's objectives for the Project are specific, accurate, and reasonable. (28.8, 28.9)
- Ensuring that the BLM holds an open, inclusive, and thorough stakeholder process to ensure all stakeholders have their concerns and questions addressed and to incorporate their knowledge. (29.10)

2.4 PURPOSE AND NEED

- Concern that the DEIS clearly identifies the underlying Purpose and Need for the Project and for the alternatives that are being proposed, and that it is the BLM's Purpose and Need, not that of the proponent. (16.1, 33.3)
- Statements that the existing electricity grid is congested and the Project is necessary to provide additional transmission with diverse supplies protected from emergency conditions. (1.4, 26.1, 34.2, 34.6)
- Statement that everyone needs adequate electricity, whether members of the public or public agencies. (1.4)
- Belief that the Project would not benefit the local public, only the proponent. (33.25)
- Belief that the Purpose and Need for the Project should include the need to protect wildlife, cultural resources, property values, and the need to utilize the most efficient energy alternatives. (33.7)

• Belief that the Project would facilitate efficient and increased sharing of generation resources between Arizona and California and would enhance operational flexibility. (34.6)

2.5 PROPOSED ACTION

- Statements that the transmission line should parallel the existing Devers to Palo Verde (DPV) line to avoid further impacts. (11.4, 24.21, 24.22)
- Desire to see practices that preserve habitat, minimize weed invasion, and prevent erosion incorporated into the Project. (16.18)
- Desire to see existing roads used to avoid use of new areas by off-highway vehicles (OHV), new erosion, and impacts to wildlife and wildlife habitat. (25.14)
- Concerns that based on previous attempts to site a transmission line through the Kofa NWR, the Project would be controversial which would result in delays and a costly permitting process. (26.2, 29.2, 32.5, 32.9)

2.6 ALTERNATIVES

- Suggestions that the BLM consider enough alternate routes and configurations for the Project, including alternatives that demonstrate compliance with other applicable laws such as the Clean Water Act Section 404, or to avoid impacts to Endangered Species Act (ESA)-listed species, as appropriate. (16.2, 17.3, 30.2, 30.3, 30.4)
- Requests that the route avoid impacting land occupied or in fee trust by other utilities. (39.2, 43.2)
- Belief that the BLM should choose the No Action alternative. (33.8)
- Opposition to the proposed alternate route through Johnson Canyon. (4.1, 5.2, 6.1, 7.1, 9.1, 11.1, 24.19, 35.1)
- Requests that the BLM consider a route alternative in the West Wide Energy Corridor (WWEC) 30-52 and include such an alternative in the DEIS. Respondents believe that the WWEC 30-52 is an area earmarked for transmission that would have relatively low environmental impact, and that extensive work has already been done to analyze it. (17.3, 24.24, 24.26, 25.7, 26.3, 28.4, 29.1, 29.3, 29.4, 29.5, 29.6, 29.7, 29.8, 29.9, 31.1, 32.2, 32.6, 32.16, 32.17, 32.18, 35.7, 38.3)
- Concerns that some of the route alternatives would impact the mission (training and operations) of the YPG. (23.1, 44.6, 44.7, 44.9)
- Concern that placing the transmission line crossing near the A10 backwater on the Colorado River could affect fish species listed under the ESA. (25.11)
- Suggestion to include one substation near the Brenda Solar Energy Zone because it would host a large amount of renewable energy generation in addition to surrounding lands that

are identified through the Restoration Design Energy Project as Renewable Energy Development Areas. (31.3)

2.7 MONITORING AND MITIGATION

- Desire to see specific, effective, durable, mitigation measures that comply with existing guidance and a Mitigation Monitoring and Reporting Program in the DEIS, including which lands would be used for such mitigation, if necessary. (16.16, 16.35, 17.6, 32.4, 32.27, 32.29)
- Suggestion that construction avoid the primary nesting season for desert birds from January to April. (17.8)
- Suggestion to mitigate for conflicts with military operations and training by utilizing Project structures no taller than 199 feet above the ground surface, night vision compatible red lighting, and infrared energy emissions between 675 and 900 nanometers. (20.2)
- Concerns that continuing to isolate and remove recreational or possible economic development properties with federal projects unduly burdens county jurisdictions. (24.15)
- Reminder that the AGFD would seek compensation for actual or potential habitat losses at a 100 percent level as mitigation. (25.6, 33.19)
- Suggestion that the use of raptor perch deterrents be considered as a method to reduce impacts on raptor prey species. (25.12)
- Suggestion that the use of markers on the Project structures be considered to reduce the number of bird collisions and reduce the chance for collisions by low flying aircraft. (25.13, 25.18)
- Suggestion that best management practices be developed to minimize the risk of introducing invasive plants. (24.17)
- Suggestion that lands with wilderness characteristics (LWC) be mitigated pursuant to BLM mitigation policy and Presidential Memorandum (Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment [2015]) if they can't be avoided; and that the mitigation must be flexible to ensure success. (32.20, 32.25, 32.26, 32.31, 32.32)
- Suggestion that mitigation should benefit conservation within the larger landscape. (32.28)

2.8 CUMULATIVE EFFECTS

• Suggestions that the DEIS include a robust cumulative impacts analysis of all resources, including the methodology used to assess the impacts and mitigation related to cumulative impacts. (1.3, 16.5, 16.25, 16.26, 16.27, 24.1, 24.5, 24.27, 25.15, 33.21)

• Concerns that an additional transmission line would cause cumulative effects to the bighorn sheep population in the Saddle Mountain Area of Critical Environmental Concern near the Delaney Substation. (28.22)

2.9 AIR QUALITY AND GREENHOUSE GASES

• Concerns about the effects of the Project on air quality, such as the effects on the environment and human health related to fugitive dust generated during construction and whether the Project could affect, or be affected by, greenhouse gases (GHG) and climate change. Therefore, respondents want to see a thorough analysis of air quality and climate change for both construction and operations using established guidance, and assurances that design and mitigation measures take into account air quality and climate change. (16.14, 16.15, 16.28, 16.29, 16.30, 16.31, 33.11)

2.10 BIOLOGICAL RESOURCES

2.10.1 Vegetation Resources, including Noxious and Invasive Weeds and Special Status Species

- Concerns that the Project would affect vegetation, and that those impacts would be more substantial because it is a sensitive desert habitat. (16.17, 16.18, 40.2)
- Suggestions that the DEIS include a complete list and analysis of impacts on all native plants that would be impacted by the Project, especially those listed under the ESA or tribal and state authorities. (16.21, 25.8, 28.14, 33.23)
- Concerns that construction and use of roads would facilitate invasion of invasive and nonnative plants, which could impact native desert species. Respondents stated that the BLM should use their authority to ensure the Project provides for the use of native plants when revegetation is necessary, requires control of invasive and nonnative plants, and that an invasive plant management plan is implemented as part of the Project. (16.7, 16.24, 28.15)

2.10.2 Wildlife, including Special Status Wildlife, Migratory Birds, and Fisheries

- Concerns that the Project would affect wildlife, and those impacts would be more substantial because it is a sensitive desert habitat. (16.17, 32.12, 40.2, 43.15)
- Suggestion that the DEIS analyze all ESA-listed wildlife species in the study area, as well as AGFD Species of Greatest Conservation Need (SGCN) and Species of Economic and Recreational Importance (SERI). (25.2, 28.19, 28.20, 28.29, 28.30, 28.31, 33.19)
- Suggestion that the wildlife analysis in the DEIS include impacts to wildlife linkages and corridors during all phases of the Project (construction, installation, and maintenance). (16.20, 16.23, 28.34, 33.18)

- Concerns specifically related to wildlife in the Plomosa Mountains and Cooper Bottom Pass in the Dome Rock Mountains. (25.3, 25.5, 25.9)
- Concerns that because the Colorado River and microphyll woodland washes are significant bird migration corridors, siting a transmission line across them would pose a threat related to bird collisions unless the Project structures are designed to reduce this hazard. (17.4, 17.7, 28.18, 33.17)
- Statement that the A10 backwater on the Colorado River, south of the existing DPV line, contains and is stocked with endangered razorback suckers. The respondent is concerned with possible effects on the fish from transmission lines, which at this time are not fully understood. (25.10)
- Concerns related to the impacts to ongoing and future Sonoran pronghorn recovery efforts on the Kofa NWR. (3.4, 25.16, 28.24, 28.25, 28.26, 28.33, 32.1, 32.8, 32.13, 32.15, 33.22, 38.2)
- Concerns that the Project could jeopardize the investment that AGFD and other cooperating agencies have had in the reintroduction of bighorn sheep in the study area. (28.21)
- Concerns that transmission lines affect bighorn sheep habitat abandonment, reproductive success, or lamb mortality (through maternal abandonment). (32.12)
- Concerns that Project construction would remove habitat for the Mojave desert tortoise, potentially crush Mojave desert tortoises and their burrows, and increase predation of young Mojave desert tortoises because transmission lines provide observation perches for predatory birds. (28.27, 33.19)
- Concerns that Project construction and maintenance vehicles would pose a mortality threat to Mojave fringe-toed lizards unless avoidance measures were enforced and the presence of the transmission line would impact the sand transport corridors of the lizards. (28.28, 33.19)

2.11 CULTURAL RESOURCES

- Concerns that impacts to cultural resources could occur during construction of the Project. (27.2)
- Statements that the BLM must adhere to the National Historic Preservation Act Section 106 requirements. (18.1, 21.1, 22.1, 27.1, 27.3)

2.12 TRIBAL RELATIONS AND TREATY RIGHTS

- Concern that the rights of indigenous peoples could be impacted by the Project. (40.2)
- Statements that the BLM must effectively conduct government-to-government consultation with affected Native American tribes. (18.1, 21.1, 22.1, 27.3, 27.1)

2.13 HAZARDOUS MATERIALS AND HAZARDOUS AND SOLID WASTE

- Suggestion that the Project should minimize the generation of hazardous waste, and that the DEIS address potential direct, indirect, and cumulative impacts of waste generation, including hazardous waste, from construction and operation. (16.32)
- Concerns that if herbicides are used to control invasive plants it could affect the health of those in nearby communities or recreating near the Project. (33.24)

2.14 TRANSPORTATION, PUBLIC HEALTH, AND SAFETY

- Concern that constructing new access roads would encourage more OHV use. (28.16)
- Concerns that some of the alternative route segments would increase the potential for illegal access onto the YPG from the north by OHV riders, unauthorized hunters, and other unauthorized individuals. (23.9, 23.10, 44.12, 44.13)
- Concerns over health effects from electromagnetic frequencies from transmission lines. (10.3, 10.4)
- Concerns over health effects related to fungus in fugitive dust that causes valley fever; and a recommendation that an Environmental Awareness Program for Project workers should be developed. (16.33)

2.15 LAND USE, AGRICULTURE, SPECIAL DESIGNATIONS, AND WILDERNESS

- Statements that a transmission line through the refuge is not compatible with the Kofa NWR's mission and purpose. (17.2, 28.3, 28.32, 28.33, 32.7, 32.15)
- Concerns that several of the alternative route segments would bring the transmission line into close proximity to the YPG, which could affect YPG frequency quality related to unmanned aerial systems and electronic countermeasures programs. (23.11, 44.14)
- Concerns that several of the alternative route segments would affect the security of the YPG by providing line-of sight into the range. (23.12, 44.15)
- Concern that the Project would affect the wilderness values of naturalness, undeveloped quality, and opportunities for primitive recreation and solitude in wilderness present in the Kofa NWR. (28.16)
- Suggestions that the BLM analyze LWC, including scenic values; wildlife habitat, connectivity, and riparian areas; cultural resources; quality of life; and balanced use; an update to the BLM's inventory of LWC would be necessary to accomplish this. (28.17, 32.3, 32.19, 32.21, 32.23)

- Suggestion that the BLM should analyze additional protective management of LWC as part of the RMP amendment. (32.22)
- Concerns that the installation of the transmission line would affect agricultural field operations, irrigation, aerial spraying, and wind breaks. (43.3, 43.7, 43.8)
- Concern that Project structures on agricultural land would render the land permanently non-producing, placing a greater burden on remaining lands and affecting the current land management. (43.9)

2.16 RECREATION

- Concerns that the Project would affect recreation in the study area, including recreational vehicle (RV) camping, hunting, and OHV riding. (3.2, 38.1)
- Concerns that a transmission line would detract from the scenery and the technical OHV riding experience in the area, including in Johnson Canyon and the Arizona Peace Trail. (4.2, 5.1, 6.2, 6.3, 9.2, 9.3, 11.2, 13.1, 14.2, 35.2, 35.3)
- Concerns that the Project would close or affect the OHV access to the Yuma or Colorado River area via Johnson Canyon, since this route on the Arizona Peace Trail is the only way to stay off the Colorado River Indian Tribes' reservation and the YPG. (6.4, 7.2, 12.1, 13.2, 14.1, 15.4, 35.4)
- Concern that construction of the Project would damage trails. (35.6)

2.17 SOCIOECONOMICS

- Concerns that the transmission line would negatively affect property rents and values. (10.1, 10.5, 10.6, 43.6)
- Concerns that the Project would impact economic opportunities in western Arizona by affecting recreation and land available for recreation. (6.5, 12.2, 24.6, 35.5)
- Concerns that the reduction in tax base caused by the Project would cause negative fiscal and social impacts to counties and undermine the counties' ability to sustain themselves through tax revenues in the long-term. (24.2, 24.6, 24.9)
- Suggestion that the socioeconomic analysis in the DEIS include impacts specifically for each county in the study area, rather than only one large socioeconomic analysis area. (24.13)
- Suggestion that the socioeconomic analysis in the DEIS include the change in federal lease dollars gained by the government versus the change in annual income by the affected counties. (24.16)
- Suggestion that the DEIS include an economic analysis of nonmarket values related to LWC. (32.24)

- Belief that the Project would create jobs and diversify and stabilize the regional economy during the construction phase, which would also boost the local economies. (34.3, 34.4)
- Concern that the Project would cause rate hikes for electricity ratepayers. (33.15)
- Concern that the Project would affect revenue generation for other utilities. (43.10)

2.18 VISUAL RESOURCES

• Concern that the Project would change the visual aesthetics of the area, and the impact should be evaluated from the most conservative standards. (10.2, 33.12)

2.19 WATER RESOURCES

- Concerns that the Project would affect surface water and groundwater quality and quantity. (16.3. 16.4, 16.6, 43.13)
- Suggestion that the DEIS should describe all Waters of the U.S. (WOTUS) that could be affected by the Project alternatives, and identify whether the Project requires a Section 404 permit under the Clean Water Act from the U.S. Army Corps of Engineers. (16.9, 16.10)
- Dissenting comments stated that natural washes should be used for flood control, and that washes should be avoided due to the risk of erosion. (16.12, 16.13)
- Concern that Project structures may impact efficient irrigation programs that are in place to enhance water conservation and protect the water supply in California. (43.8, 43.11)

2.20 OUT OF SCOPE COMMENTS

A number of comments were determined to be out of scope. The out of scope comments either had no bearing on the Project, involved actions that would be beyond the purview of the BLM, were outside BLM legal authority, or were contrary to the legislative authority and mission of the BLM. Because the following comments were determined to be out of scope, they will not be used for issue identification (Section 3.0).

2.20.1 Out of Scope for the Project

- Concern that the transmission line would require the BLM to exercise eminent domain. (33.1, 33.14)
- Belief that the BLM should transfer acreage into County jurisdiction to support County renewable energy project(s). (24.12, 24.25, 24.28)
- Statement that the BLM did not respond adequately to La Paz County's critique of the Brenda Solar Energy Zone. (24.18)

- Statement that the BLM does not inform and involve county jurisdictions adequately, and doesn't consider how the BLM's actions limit county leadership. (24.4)
- Statement that locally sourced forms of renewable energy, such as rooftop solar, should be encouraged, rather than developing electricity that needs to be transported long distances. (33.8)
- Belief that the BLM must consider more environmentally friendly and less costly ways to generate renewable energy rather than those that require transmission. (33.10)

2.20.2 Outside BLM Authority or Mission

- Statement that the BLM should assist counties in creating economic revenue streams. (24.11)
- Belief that it is the BLM's responsibility to demonstrate that the Project can stimulate and support renewable energy. (17.9, 28.5, 28.6, 28.7, 31.2)
- Statement that the DEIS should include an analysis of the current and future spare capacity on the existing DPV transmission line. (28.10)
- Belief that fees should be paid locally to counties to offset impacts from the Project and Project mitigation. (24.14, 24.17)
- Belief that fees should be paid to the counties to justify impacts to visual qualities, property values, right of way issues, and impacts to the ability to pay for social services. (24.14)

3.0 ISSUE IDENTIFICATION

Based upon internal, agency, and public scoping, the BLM has identified issues associated with the Project. These issues address components of both the human and natural environment. They stem from the scoping input and are generally stated concerns (which may incorporate multiple scoping comments) about the NEPA process and how environmental resources may be affected. The issues help to make reasoned choices between the alternatives and to address impacts in the EIS. The following subsections discuss each of the identified issues.

3.1 NEPA PROCESS

Information provided to the public to date has been perceived as insufficient or difficult to understand.

3.2 PROPOSED ACTION

The Project would result in new disturbance with associated resource impacts.

The Project may be incompatible with the missions or needs of other jurisdictions.

3.3 ALTERNATIVES

Alternatives should be developed to reduce or avoid impacts, such as avoiding the need for a Section 404 permit, and impacts to the Kofa NWR, the YPG, Johnson Canyon, and State lands.

Alternatives should be developed to take advantage of identified utility corridors.

3.4 MONITORING AND MITIGATION

Appropriate and resource-specific monitoring programs and mitigation should be developed in conjunction with the Project.

3.5 AIR QUALITY AND GREENHOUSE GASES

Construction and operation of the Project would result in generation of emissions and could cause a change in ambient air conditions.

The Project may impact, or be impacted by, climate change, including GHG emissions.

3.6 BIOLOGICAL RESOURCES

3.6.1 Vegetation Resources, including Noxious and Invasive Weeds and Special Status Species

The Project could remove native vegetation and impact plant habitat, including rare, native, and special status plant species.

The Project could influence the spread of invasive and noxious plants.

3.6.2 Wildlife, including Special Status Wildlife, Migratory Birds, and Fisheries

The Project may adversely affect wildlife, including special status species, by direct disturbance, stressing populations, and fragmentation of wildlife corridors and linkages.

The Project could increase predation because it would provide numerous perches for predatory birds to detect prey.

The Project could cause direct mortality to wildlife during construction due to construction vehicle traffic, vegetation removal, and excavation activities.

The Project may affect ESA listed fish species and their habitat at the Colorado River crossing.

Adverse impacts to threatened, endangered, and sensitive wildlife species should be minimized or avoided.

3.7 CULTURAL RESOURCES

Cultural resource sites may be impacted by the Project and should be avoided.

3.8 TRIBAL RELATIONSHIPS AND TREATY RIGHTS

The BLM must effectively conduct government-to-government consultation with affected Native American tribes and adhere to National Historic Preservation Act Section 106 requirements.

The Project may impact the ability of tribal members to exercise their treaty rights in the Project area.

3.9 HAZARDOUS MATERIALS AND HAZARDOUS AND SOLID WASTE

Hazardous materials or petroleum products may be used during construction and operation that could affect soil, groundwater, and communities in the Project area.

3.10 TRANSPORTATION, PUBLIC HEALTH, AND SAFETY

The construction of new roads associated with the Project could increase OHV use within the Project area and/or spread OHV use into new areas.

The use of new and existing roads for access to the transmission line could increase the potential for trespass on the YPG by OHV riders and unauthorized individuals.

Construction of the Project may increase the threat of contracting valley fever via fugitive dust, which carries the virus.

Electromagnetic frequencies (EMF) from the transmission line could affect the health of those near the line or create the perception of potential adverse health effects.

3.11 LAND USE, AGRICULTURE, SPECIAL DESIGNATIONS, AND WILDERNESS

The Project could impact military operations and training on the YPG because the transmission line EMFs could affect YPG radio frequencies and make the facility less secure.

The Project could interfere with agricultural operations and efficiency.

The Project could affect the wilderness values of naturalness, undeveloped quality, and opportunities for primitive recreation and solitude, both within designated wilderness and LWC.

The Project could affect the operation of existing utilities in the Project area.

The Project would not be compatible with the mission of and purpose for the Kofa NWR.

3.12 RECREATION

The Project could affect hunting, recreation access, and recreational experiences within the Project area.

The Project could affect the pristine qualities and technical challenge of Johnson Canyon and the Arizona Peace Trail, which could detract from the recreation experience in these areas.

The Project could affect recreational vehicle camping in the Quartzsite area.

3.13 SOCIOECONOMICS

The Project would improve access to and cost of environmentally friendly energy sources.

The Project could adversely affect property rents and values.

Because the Project could adversely affect the recreation experience, it could also affect economic opportunities related to tourism and recreation in the Project area.

There could be a reduction in the tax base in affected counties that may reduce the counties' ability to fund services for residents.

Construction of the Project could affect employment opportunities.

The transmission line could affect revenue generation by other utilities.

Adverse economic impacts to local communities would also lead to adverse social impacts and undermining future economic development options.

Indirect impacts from mitigation could also adversely impact economics in the Project area.

Social and economic conditions and impacts need to be broken out by county.

3.14 VISUAL RESOURCES

The Project could affect the quality of the visual landscape.

3.15 WATER RESOURCES

The Project could affect washes, stream channels, hydrologic function, and future flood control.

The Project could impact the quality and/or quantity of surface and groundwater.

The Project could affect efficient agricultural irrigation, which could impact groundwater and surface water supply.

4.0 REFERENCES

- Bureau of Land Management (BLM). 2001. The Federal Land Policy and Management Act of 1976, *as amended*. Compiled by U.S. Department of the Interior Bureau of Land Management and Office of the Solicitor, Washington, D.C. October 2001.
- Bureau of Land Management (BLM). 2005. Land Use Planning Handbook. BLM Handbook H-1601-1 (supersedes Re. 1-1667). Release # 1-1-1693, March 11, 2005.
- Bureau of Land Management (BLM). 2016. Ten West Link Project Alternatives Analysis Report. In development.

California ISO (CAISO). 2014. 2013-2014 Transmission Plan. Prepared by Infrastructure Development, approved by ISO Board of Governors July 16, 2014. Available at: https://www.caiso.com/Documents/Board-Approved2013-2014TransmissionPlan_July162014.pdf.

Appendix A – Public Notices



opportunity to make comments to the Board on the Wild Horse and Burro Program. Persons wishing to make comments during the meeting should register in person with the BLM by 3 p.m. on April 13, 2016, at the meeting location. Depending on the number of commenters, the Advisory Board may limit the length of comments. At previous meetings, comments have been limited to 3 minutes in length; however, this time may vary. Speakers are requested to submit a written copy of their statement to the address listed in the ADDRESSES section above, email comments to whbadvisoryboard@ *blm.gov,* or bring a written copy to the meeting. There may be a webcam present during the entire meeting and individual comments may be recorded.

Participation in the Advisory Board meeting is not a prerequisite for submission of written comments. The BLM invites written comments from all interested parties. Your written comments should be specific and explain the reason for any recommendation. The BLM appreciates any and all comments. The BLM considers comments that are either supported by quantitative information or studies or those that include citations to and analysis of applicable laws and regulations to be the most useful and likely to influence the BLM's decisions on the management and protection of wild horses and burros.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask in your comment that the BLM withhold your personal identifying information from public review, the BLM cannot guarantee that it will be able to do so.

(Authority: 43 CFR 1784.4-1)

Kristin Bail,

Acting Assistant Director, Resources and Planning.

[FR Doc. 2016–06575 Filed 3–22–16; 8:45 am]

BILLING CODE 4310-84-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLWY920000. 16XL5017AR. L57000000.RB0000]

Notice of Proposed Reinstatement of Terminated Oil and Gas Lease WYW179123, Wyoming

AGENCY: Bureau of Land Management, Interior

ACTION: Notice.

SUMMARY: Per the Mineral Leasing Act of 1920, Douglas C. McLeod filed a petition for reinstatement of competitive oil and gas lease WYW179123 for land in Crook County, Wyoming. The petition was filed on time, and the lessee paid the required rentals accruing from the date of termination. No leases that affect these lands were issued before the petition was filed.

FOR FURTHER INFORMATION CONTACT: Chris Hite, Chief of Fluid Minerals Adjudication. Bureau of Land Management, Wyoming State Office, 5353 Yellowstone Road, Chevenne, Wyoming, 82009; phone 307-775-6176; email *chite@blm.gov*. Persons who use a telecommunications device for the deaf may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact Mr. Hite during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The lessee agreed to the amended lease terms for rentals and royalties at rates of \$10 per acre, or fraction thereof, per year and 16²/₃ percent, respectively. The lessee also agreed to the amended lease stipulations described in the associated Reinstatement Certification. The lessee has paid the required \$500 administrative fee and the \$159 cost for publishing this notice. The lessee met the requirements for reinstatement of the lease per Sec. 31(d) and (e) of the Mineral Leasing Act of 1920. The BLM proposes to reinstate the lease effective July 1, 2012, under the original terms and conditions of the lease and the increased rental and royalty rates cited above.

Chris Hite,

Chief, Branch of Fluid Minerals Adjudication. [FR Doc. 2016–06570 Filed 3–22–16; 8:45 am]

BILLING CODE 4310-22-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLAZ920000 16X L51010000.ER0000 LVRWA16A3240]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Ten West Link 500-Kilovolt Transmission Line Project and Potential Amendment to the Yuma Field Office Resource Management Plan in Maricopa and La Paz Counties, AZ, and Riverside County, CA

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

SUMMARY: In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976, as amended, the Bureau of Land Management (BLM), Arizona State Office, Phoenix, Arizona, with the possibility of Western Area Power Administration serving as a co-lead agency, intends to prepare an environmental impact statement (EIS) for the proposed Ten West Link 500kilovolt (kV) Transmission Line Project (Project) and potential amendment to the Yuma Field Office Resource Management Plan pursuant to the BLM's land use planning regulations. By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues on the proposed transmission line and potential plan amendment.

DATES: Comments on issues may be submitted in writing until May 9, 2016. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local media, newspapers, and the BLM Web site at: *http://www.blm.gov/az/st/ en.html.* In order to be included in the Draft EIS, all comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later. The BLM will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments related to the Project by any of the following methods:

• Web site: http://www.blm.gov/az/st/ en.html.

- Email: TenWestLink@blm.gov.
- Fax: 602-417-9452,

• *Mail:* BLM, Arizona State Office, Attention: Eddie Arreola/Ten West Link Project, One North Central Avenue, Suite 800, Phoenix, AZ 85004. Documents pertinent to this proposal may be examined at the Arizona State Office.

FOR FURTHER INFORMATION CONTACT: Eddie Arreola, Project Manager, at telephone 602-417-9505; address: BLM, Arizona State Office, One North Central Avenue, Suite 800, Phoenix, AZ 85004: email: earreola@blm.gov. People who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 800-877-8339 during normal business hours to contact the BLM Project Manager listed above. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question for the above individual. You will receive a reply during normal business hours. SUPPLEMENTARY INFORMATION: The applicant, DCR Transmission, LLC, has submitted an application to the BLM for a right-of-way (ROW) to construct, operate, maintain, and decommission a single-circuit 500-kV transmission line. Authorization of the proposed transmission line may require an amendment to the Yuma Field Office Resource Management Plan (January 2010) to change visual resource management classifications and to possibly change or reclassify designated utility corridors. The proposed transmission line may require other land use plan amendments for the Project, including the Lower Sonoran, Bradshaw-Harquahala, Lake Havasu Resource Management Plans and the California Desert Conservation Area Plan, depending on newly proposed alternatives during scoping and during the analysis. The Project would provide a connection between the Arizona Public Service Company's Delaney Substation in Tonopah, Arizona, and the Southern California Edison Company's (SCE) Colorado River Substation in Blythe, California. The project purpose is to strengthen the electrical grid and improve reliability. The Project area involves approximately 83 miles of public lands along a route spanning roughly 114 miles. Approximately 97 miles is in Arizona and 17 miles is in California. The Project would largely follow the existing SCÉ Devers-Palo Verde 500-kV No.1 (DPV1) transmission line in an established utility corridor. The transmission line may be supported by a combination of self-supporting Hframe structures and steel lattice structures. Any final decision on a specific type of structure will be based on topography, structural requirements, economics, the environment, and other applicable considerations. The structures are anticipated to be

constructed of guyed galvanized steel with a height ranging from 100 to 190 feet, and a width of approximately 100 feet. The distance between each structure would depend on site-specific characteristics, but is expected to be 400 to 2,200 feet with an average span length of approximately 1,600 feet.

The Project would involve additional facilities, including the construction of a series compensation substation parallel to the existing compensation substation located in Vicksburg, Arizona. To the extent possible, existing access roads for the DPV1 transmission line would be used for construction and maintenance. For a 2.8-mile segment of the proposed route, DCR Transmission would need an agreement with SCE to use the vacant circuit positions on SCE's existing double-circuit towers in the Copper Bottom Pass area. The requested ROW width on public lands is 200 feet.

The purpose of the public scoping process is to identify relevant issues that will influence the scope of the environmental analysis, including potential alternatives, and guide the process for developing the EIS. At present, the BLM has identified the following preliminary issues: Visual resource management classifications that would not allow a 500kV transmission line, possible route changes outside the designated corridors, potential interference with the U.S. Army's Yuma Proving Ground; cultural resources; Native American cultural concerns; social and economic effects; potential public health and safety; wildlife (including migratory birds); special status species; and recreation. The analysis will also consider mitigation at a regional scale for those resources that warrant mitigation offsite.

The BLM will use the NEPA public participation requirements to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the Project will assist the BLM in identifying and evaluating impacts to such resources in the context of both the NEPA and Section 106 of the NHPA.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the Project are invited to participate in the scoping process. If eligible, they may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

Authority: 40 CFR 1501.7.

Raymond Suazo,

Arizona State Director. [FR Doc. 2016–06626 Filed 3–22–16; 8:45 am] BILLING CODE 4310–32–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCO922000-L13100000-FI0000-16X]

Proposed Reinstatement of Terminated Oil and Gas Lease COC73441, Colorado

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

SUMMARY: As provided for under the Mineral Lands Leasing Act of 1920, as amended, the Bureau of Land Management (BLM) received a petition for the reinstatement of oil and gas lease COC73441 from Synergy Resources Corporation, for lands in Morgan County, Colorado. The lessee filed the petition on time, along with all the rentals due since the lease terminated under the law.

FOR FURTHER INFORMATION CONTACT: Cheryl Hirschel, BLM Land Law Examiner, Fluid Minerals Adjudication, at (303) 239-3749. Persons who use a telecommunication device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or questions with the above individual. You will receive a reply during normal business hours. SUPPLEMENTARY INFORMATION: The lessee has agreed to the amended lease terms for additional stipulations and for

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT NEWS RELEASE Arizona State Office



Release Date: 03/23/16 Contacts: Joe Incardine 801-560-7135; jincardi@blm.gov

BLM Seeks Comment on Proposed Transmission Line

Public invited to review and comment during scoping period for Ten West Link Project in Arizona and California

PHOENIX – The Bureau of Land Management (BLM) today released a notice of intent to prepare an environmental impact statement (EIS) for a proposed electrical transmission line between Maricopa and La Paz Counties, Arizona, and Riverside County, California.

The notice of intent opens a 45-day scoping period, during which the public has the opportunity to identify issues that should be considered in the EIS. The scoping period ends 45 days after publication of the *Federal Register*. **The 45-day period ends on Monday, May 9, 2016**.

The proposed project is the Ten West Link 500-kilovolt Transmission Line. It is a joint project of Abengoa Transmission & Infrastructure, LLC, and Starwood Energy Group Global, Inc. Together they have formed DCR Transmission, LLC, which is the company proposing to build the transmission line.

The proposal is to build a transmission line from Tonopah, Arizona, to Blythe, California. It would span 114 miles, with 83 miles of it on public lands managed by the BLM. All but 17 miles of the line would be in the Arizona counties of Maricopa and La Paz.

As part of the scoping process, the BLM will hold public meetings on these dates at these locations.

Tuesday, April 12, 2016 Ruth Fisher Elementary 38201 W. Indian School Tonopah, AZ 85354 Doors Open at 5:30 Presentation starts at 6:30

Wednesday, April 13, 2016 Quartzsite Senior Center 40 S. Moon Mountain Avenue Quartzsite, AZ 85346 Doors Open at 5:30 Presentation Starts at 6:30

Thursday, April 14, 2016 Blythe Community Center 445 N. Broadway Blythe, CA 92225 Doors Open at 5:30 Presentation starts at 6:30

The public will have a chance at the meetings to learn about the proposed project and to offer insights on issues that should be considered in the study. Public comments made at the meeting or through other communications with the BLM during the scoping period will be addressed in the Draft EIS.

Written comments may be submitted to the BLM, Arizona State Office, One North Central Avenue, Suite 800, Phoenix, Arizona 85004, Attention: Eddie Arreola or via email to earreola@blm.gov.

The BLM manages more than 245 million acres of public land, the most of any Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield. In Fiscal Year 2014, the BLM generated \$5.2 billion in receipts from public lands.

Last updated: 03-28-2016

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PUBLIC SCOPING MEETINGS



Ten West Link 500kV Transmission Line Project and Proposed Resource Management Plan Amendment

DCR Transmission, LLC (DCRT) has filed a right-of-way (ROW) application with the Bureau of Land Management (BLM; lead agency) proposing to construct, operate, and maintain a 500kV transmission line (the Project) spanning approximately 114 miles. The proposed route would cross approximately 97 miles in Arizona and 17 miles in California. Of the total length, 83 miles are on public land; the majority of the public land crossed would be in Arizona.

The BLM Yuma Field Manager will issue the federal decision regarding the ROW grant; and the BLM's Arizona State Director will issue a separate but related decision on an amendment to the Yuma Resource Management Plan. The California Public Utilities Commission is also required to issue their own decision on that portion of the Project in California Other decisions may be required from additional cooperating agencies as they are identified.

The EIS must include the analysis of alternatives to the proposed route. While the proposed route largely follows the existing Southern California Edison Devers-Palo Verde 500kV transmission line in an established utility corridor, there are a number of potential alternative routes in the study area that could be considered by the BLM. The BLM is seeking your input on the proposed Project and potential alternatives to the proposed route as part of the public scoping process. Three Scoping meetings will be held to introduce and describe the Project to the public and to solicit feedback from the public regarding the Project and potential alternatives.

Public Meeting Locations | Presentations Begin at 6:30 p.m.

Tuesday, April 12, 2016 5:30 p.m. - 8:00 p.m. Ruth Fisher Elementary School Cafeteria 38201 W. Indian School Road Tonopah, AZ 85354 Wednesday, April 13, 2016 5:30 p.m. - 8:00 p.m. Quartzsite Senior Center 40 S. Moon Mountain Ave. Quartzsite, AZ 85346 Thursday, April 14, 2016 5:30 p.m. - 8:00 p.m. Blythe Community Center 445 N. Broadway Blythe, CA 92225

MAIL COMMENTS TO: Ten West Link Project c/o Joe Incardine BLM State Office One North Central Ave, Suite 800 Phoenix, AZ 85004

EMAIL COMMENTS TO: blm_az_azso_10WestLink@blm.gov

> FAX COMMENTS TO: Ten West Link Project c/o Joe Incardine 602-417-9452

PROJECT WEBSITE: http://www.blm.gov/az/st/en/prog/ energy/10_west_link_transmission.html

COMMENTS DUE MAY 9, 2016



A Spanish interpreter will be available at the meetings. Un intérprete de español estará disponible en cada reunion. If you require special accommodations, contact: Ellen Carr at Galileo Project email: ellen.carr@galileoaz.com | telephone: 480-629-4705

Appendix B – Scoping Invitation Letters and Email Notifications



United States Department of the Interior

BUREAU OF LAND MANAGEMENT Colorado River District Yuma Field Office 7341 E. 30th Street, Suite A Yuma, Arizona 85365-6525 www.blm.gov/az



In Reply Refer To: 8120 (9200/C020) AZA-36819

March 30, 2016

Ms. Elaine Johnson U.S. Fish and Wildlife Service - Kofa National Wildlife Refuge 9300 E 28th Street Yuma, AZ 85365

Dear Ms. Johnson:

The Bureau of Land Management (BLM) Yuma Field Office cordially invites you to participate in the public scoping process for the proposed Ten West Link 500 kilovolt (kV) transmission line project (Project). The proposal also includes an amendment to the Yuma Field Office Resource Management Plan (RMP) for visual resources and utility corridor designations. Public scoping is the first step in the preparation of an Environmental Impact Statement (EIS) for any project under a federal nexus. The public scoping process is designed to introduce the proposed Project to the public and solicit comments on what the BLM and cooperating agencies should consider in the analysis. This letter is an invitation to an agency-only Scoping meeting scheduled on **April 12**, **2016 from 9:00 a.m. to 11:00 a.m. at the BLM National Training Center**, 9828 N. 31st Avenue, Phoenix Arizona 85051.

DCR Transmission, LLC (DCRT) filed a right-of-way (ROW) application with the BLM on September 14, 2015. DCRT proposes to construct, operate, and maintain the Project. The Project would connect the Delaney Substation west of Tonopah, Arizona and the Colorado River Substation west of Blythe, California. The total length of the proposed Project is 114 miles with approximately 97 miles in Arizona and 17 miles in California. Of the total length, 83 miles are on public land; the majority of the public land crossed would be in Arizona. While the proposed route largely follows the existing Southern California Edison Devers-Palo Verde 500kV transmission line in an established utility corridor, there are a number of utility corridors and potential alternative route segments in the study area. Additional alternatives may be developed after scoping during the alternatives analysis process. A map of the project area is enclosed for your reference.

The BLM's decisions are to approve, deny, or approve with modifications the proposed Project; and to determine whether to amend the Yuma RMP. Because a portion of the Project would be in California, the California Public Utilities Commission (CPUC) is also required under the California Environmental Quality Act (CEQA) to issue its own decision on that portion of the Project in California. The CPUC will serve as a cooperating agency and will ensure that the EIS also meets the requirements of CEQA. Additional related decisions will likely be required by other agencies.

The BLM is seeking your input (resource concerns, planning information, laws, development plans, recreation, etc.) that would be relevant to the analysis. The 45-day Scoping period is from March 23 to May 9, 2016. We encourage you to attend the agency-only Scoping meeting on April 12, 2016 from 9:00 a.m. to 11:00 a.m. at the BLM National Training Center, 9828 N. 31st Avenue, Phoenix Arizona 85051. The meeting will be an open house format providing an overview of the Project and an opportunity to answer questions. The presentation will begin at 9:30 a.m.

Your attendance is also welcome at any of the public Scoping meetings listed below:

Tuesday, April 12, 2016	Wednesday, April 13, 2016	Thursday, April 14, 2016		
5:30 p.m. – 8:00 pm	5:30 p.m. – 8:00 pm	5:30 p.m. – 8:00 pm		
Ruth Fisher Elementary	Quartzsite Senior Center	Blythe Community Center		
School Cafeteria				
38201 W. Indian School Road	40 S. Moon Mountain Ave.	445 N. Broadway		
Tonopah, Arizona	Quartzsite, Arizona	Blythe, California		
NOTE:				
Presentation begins at 6:30 each night.				
A Spanish interpreter will be available at the meetings - Un intérprete de español estará				

disponible en cada reunion.

You may submit comments at any time during the preparation of the EIS; however, if you would like to have your comment(s) considered for inclusion in the Draft EIS, comments must be submitted during the Scoping period. You may submit your comments by any of the following methods:

- Submit your written comments directly at the agency-only meeting or any of the public Scoping meetings;
- Submit your comments electronically via email by sending them to blm_az_azso_10WestLink@blm.gov;
- Mail comments to Ten West Link Project, c/o Joe Incardine, BLM Arizona State Office, One North Central Avenue, Ste. 800; Phoenix, AZ 85004; or
- Fax comments to Ten West Link Project, c/o Joe Incardine, (602) 417-9452.

In addition to the Scoping meetings, the BLM plans to host an Economic Strategies Workshop to provide an opportunity for regional businesses, governments, and community organizations to discuss regional economic and social conditions and trends related to the proposed transmission line and RMP amendment. The date and location for the workshop will be announced on the BLM website (http://www.blm.gov/az/st/en/prog/energy/10_west_link_transmission.html) and through invitations to those parties on the Project mailing list.

If you have any questions about the Project, please contact the BLM National Project Manager, Joe Incardine, at (801) 560-7135, or **jincardi@blm.gov**. If you require special accommodations at any of the Scoping meetings, please contact Ellen Carr at Galileo Project by email at **ellen.carr@galileoaz.com** or at (480) 629-4705.

We appreciate your participation in this proposed Project.

Sincerely,

John MacDonald Field Manager

Enclosure




United States Department of the Interior

BUREAU OF LAND MANAGEMENT Colorado River District Yuma Field Office 7341 E. 30th Street, Suite A Yuma, Arizona 85365-6525 www.blm.gov/az



In Reply Refer To: 8120 (9200/C020) AZA-36819

March 31, 2016

Dear Interested Party:

The Bureau of Land Management (BLM) Yuma Field Office cordially invites you to participate in the public scoping process for the proposed Ten West Link 500 kilovolt (kV) transmission line project (Project). The proposal also includes an amendment to the Yuma Field Office Resource Management Plan (RMP) for visual resources and utility corridor designations. Public scoping is the first step in the preparation of an Environmental Impact Statement (EIS). The public scoping process is designed to introduce the proposed Project to the public and solicit comments on what the BLM and cooperating agencies should consider in the analysis.

DCR Transmission, LLC (DCRT) filed a right-of-way (ROW) application with the BLM on September 14, 2015. DCRT proposes to construct, operate, and maintain the Project. The Project would connect the Delaney Substation west of Tonopah, Arizona and the Colorado River Substation west of Blythe, California. The total length of the proposed Project is 114 miles with approximately 97 miles in Arizona and 17 miles in California; the majority of the public land crossed would be in Arizona. While the proposed route largely follows the existing Southern California Edison Devers-Palo Verde 500kV transmission line in an established utility corridor, there are a number of utility corridors and potential alternative route segments in the study area. Additional alternatives may be developed after scoping during the alternatives analysis process. A map of the project area is enclosed for your reference.

The BLM's decisions are to approve, deny, or approve with modifications the proposed Project; and to determine whether to amend the Yuma RMP. Because a portion of the Project would be in California, the California Public Utilities Commission (CPUC) is also required under the California Environmental Quality Act (CEQA) to issue its own decision on that portion of the Project in California. The CPUC will serve as a cooperating agency and will ensure that the EIS also meets the requirements of CEQA. Additional related decisions will likely be required by other agencies.

The BLM is seeking your input (resource concerns, planning information, laws, development plans, recreation, etc.) that would be relevant to the analysis. The 45-day Scoping period is from March 23 to May 9, 2016. Three Scoping meetings will be held during the Scoping period to introduce and describe the Project to the public and to solicit feedback from the public regarding the Project and potential alternatives. You are invited to attend any of the public Scoping meetings listed below:

Tuesday, April 12, 2016	Wednesday, April 13, 2016	Thursday, April 14, 2016
5:30 p.m. – 8:00 pm	5:30 p.m. – 8:00 pm	5:30 p.m. – 8:00 pm
Ruth Fisher Elementary School Cafeteria	Quartzsite Senior Center	Blythe Community Center
38201 W. Indian School Road	40 S. Moon Mountain Ave.	445 N. Broadway
Tonopah, Arizona	Quartzsite, Arizona	Blythe, California
NOTE: Presentation begins at 6:30 each A Spanish interpreter will be ava disponible en cada reunion.	night. ailable at the meetings - <i>Un intérp</i>	rete de español estará

You may submit comments or request to be added to the mailing list at any time during the preparation of the EIS; however, if you would like to have your comment(s) considered for inclusion in the Draft EIS, comments must be submitted during the Scoping period. You may submit your comments by any of the following methods:

- Submit your written comments directly at the agency-only meeting or any of the public Scoping meetings;
- Submit your comments electronically via email by sending them to blm_az_azso_10WestLink@blm.gov;
- Mail comments to Ten West Link Project, c/o Joe Incardine, BLM Arizona State Office, One North Central Avenue, Ste. 800; Phoenix, AZ 85004; or
- Fax comments to Ten West Link Project, c/o Joe Incardine, (602) 417-9452.

In addition to public Scoping meetings, the BLM plans to host an Economic Strategies Workshop to provide an opportunity for regional businesses, governments, and community organizations to discuss regional economic and social conditions and trends related to the proposed transmission line and RMP amendment. The date and location for the workshop will be announced on the BLM website (http://www.blm.gov/az/st/en/prog/energy/10_west_link_transmission.html) and through invitations to those parties on the Project mailing list.

If you have any questions about the Project, please contact the BLM National Project Manager, Joe Incardine, at (801) 560-7135, or **jincardi@blm.gov**. If you require special accommodations at any of the Scoping meetings, please contact Ellen Carr at Galileo Project by email at **ellen.carr@galileoaz.com** or at (480) 629-4705.

We appreciate your participation in this proposed Project.

Sincerely.

John MacDonald Field Manager

Enclosure

REMINDER

BUREAU OF LAND MANAGEMENT

Ten West Link Project Agency Scoping Meeting



DCR Transmission, LLC (DCRT) has filed a right-of-way (ROW) application with the Bureau of Land Management (BLM), the lead agency for the project, proposing to construct, operate, and maintain a 500kV transmission line (the Project) spanning approximately 114 miles. The proposed route would cross approximately 97 miles in Arizona and 17 miles in California. Of the total length, 83 miles are on public land; the majority of the public land crossed would be in Arizona.

The BLM Yuma Field Manager will issue the federal decision regarding the ROW grant; and the BLM's Arizona State Director will issue a separate but related decision on an amendment to the Yuma Resource Management Plan. The California Public Utilities Commission is also required to issue their own decision on that portion of the Project in California. Other decisions may be required from additional cooperating agencies as they are identified.

The EIS must include the analysis of alternatives to the proposed route. While the proposed route largely follows the existing Southern California Edison Devers-Palo Verde 500kV transmission line in an established corridor, there are a number of potential alternative routes in the study areas that could be considered by the BLM.

The BLM is seeking your input (resource concerns, planning information, laws, development plans, recreation, etc.) that would be relevant to the analysis. The 45-day Scoping period is from March 23 to May 9, 2016. An agency-only scoping meeting will be held on Tuesday, April 12, 2016 from 9:00 a.m. to 11:00 a.m., with a presentation at 11:30 a.m.

Agency Only Scoping Meeting

Tuesday, April 12, 2016 9:00 a.m. to 11:00 a.m. BLM National Training Center Wyoming Room 9828 N. 31st Avenue Phoenix, AZ 85051

If you are unable to attend the agency meeting, we hope you will be able to attend one of the public meetings listed below. Meetings will take place from 5:30 p.m. to 8:00 p.m. The presentation will begin at 6:30 p.m.

Tonopah, AZ | Tuesday, April 12

Ruth Fisher Elementary School Cafeteria 38201 W. Indian School Road Tonopah, AZ 85354

Quartzsite, AZ | Wednesday, April 13

Quartzsite Senior Center 40 S. Moon Mountain Avenue Quartzsite, AZ 85346

Blythe, CA | Thursday, April 14

Blythe Community Center 445 N. Broadway Blythe, CA 92225

Project Information

For more information, to be added to the mailing list, or to submit a comment you can use one of the following methods:

Send an e-mail: blm az azso 10WestLink@blm.gov

Visit the project website: http://www.blm.gov/az/st/en/prog/energy/10 west link transmission.html

Mail a letter:

Ten West Link Project c/o Joe Incardine BLM State Office One North Central Ave, Suite 800 Phoenix, AZ 85004

Send a fax:

Ten West Link Project c/o Joe Incardine 602-417-9452

Galileo Project | 4700 S. McClintock Drive, Suite 100, Tempe, AZ 85282

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REMINDER

BUREAU OF LAND MANAGEMENT

Ten West Link Project Public Scoping Meetings



DCR Transmission, LLC (DCRT) has filed a right-of-way (ROW) application with the Bureau of Land Management (BLM), the lead agency for the project, proposing to construct, operate, and maintain a 500kV transmission line (the Project) spanning approximately 114 miles. The proposed route would cross approximately 97 miles in Arizona and 17 miles in California. Of the total length, 83 miles are on public land; the majority of the public land crossed would be in Arizona.

The BLM Yuma Field Manager will issue the federal decision regarding the ROW grant; and the BLM's Arizona State Director will issue a separate but related decision on an amendment to the Yuma Resource Management Plan. The California Public Utilities Commission is also required to issue their own decision on that portion of the Project in California. Other decisions may be required from additional cooperating agencies as they are identified.

The EIS must include the analysis of alternatives to the proposed route. While the proposed route largely follows the existing Southern California Edison Devers-Palo Verde 500kV transmission line in an established corridor, there are a number of potential alternative routes in the study areas that could be considered by the BLM.

The BLM is seeking your input on the proposed Project and potential alternatives to the proposed route as part of the public scoping process. Three Scoping meetings will be held to introduce and describe the Project to the public and to solicit feedback from the public regarding the Project and potential alternatives. The 45-day comment period began March 23rd and will end on May 9, 2016.

We hope you will be able to join us at one of the meetings listed below. Meetings will take place from 5:30 p.m. to 8:00 p.m. The presentation will begin at 6:30 p.m.

Tonopah, AZ | Tuesday, April 12

Ruth Fisher Elementary School Cafeteria 38201 W. Indian School Road Tonopah, AZ 85354

Quartzsite, AZ | Wednesday, April 13

Quartzsite Senior Center 40 S. Moon Mountain Avenue Quartzsite, AZ 85346

Blythe, CA | Thursday, April 14

Blythe Community Center

445 N. Broadway Blythe, CA 92225

Project Information

For more information, to be added to the mailing list, or to submit a comment you can use one of the following methods:

Send an e-mail: blm az azso 10WestLink@blm.gov

Visit the project website: http://www.blm.gov/az/st/en/prog/energy/10 west link transmission.html

Mail a letter: Ten West Link Project c/o Joe Incardine BLM State Office One North Central Ave, Suite 800 Phoenix, AZ 85004

Send a fax: Ten West Link Project c/o Joe Incardine 602-417-9452

Galileo Project | 4700 S. McClintock Drive, Suite 100, Tempe, AZ 85282

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Appendix C – Open House Materials



Ten West Link Project Environmental Impact Statement (EIS) Agency Scoping Meeting Sign-in Sheet

DATE: April 12, 2016LOCATION: Phoenix, AZpageof

Please print legibly so we can read your name and address clearly. Thank you.

Name / Affiliation	Full Mailing Address and/or Email	Please include me on the mailing list for future project updates and notification of release of the EIS



SCOPING COMMENT FORM

Please Print			
Name	Organization (if applicable)		
Address	Add to mailing list Withhold personal information*	Yes Yes	No No
City, State, Zip	Would you like to participate in the Economic Strategies Workshop?	Yes	No

COMMENT (use reverse side if you need additional space or attach additional sheets)

SEND COMMENTS TO:

Ten West Link Project c/o Joe Incardine BLM Arizona State Office One North Central Ave., Ste. 800 Phoenix, AZ 85004 Email: blm_az_azso_10westlink@blm.gov Fax: (602) 417-9452

*Comments - including names, street addresses, e-mail addresses, and phone numbers (if provided) of respondents - will be available for public review at the address above during regular business hours. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Ten West Link Project c/o Joe Incardine Dne North Central Ave., Ste. 800 Phoenix, AZ 85004



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:

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing, add postage, tape bottom of fold, and mail. Please postmark by: May 9, 2016

Comment continued:

What is Scoping?

The NOI was published in the Federal Register on March 23, 2016, notifying the public of the intent to prepare an EIS. The EIS is in the first stage, called public Scoping, in which potential environmental issues, project modifications, alternative corridors, and mitigation to be evaluated in the Draft EIS are identified. During the Scoping period, the public is encouraged to provide comments and information on factors that should be considered in the EIS. Public meetings will be held during the 45-day Scoping period, which will close on May 9, 2016.

How can I participate in the Scoping process?

The BLM Yuma Field Office invites you to participate in a public process to gather input on the Project. There are a number of potential route segments in the study area that could be considered by the BLM as alternatives to the route proposed by DCRT. The BLM is seeking your input (resource concerns, planning information, laws, development plans, recreation, etc.) that would be relevant to the analysis. In addition, since it is anticipated that the EIS process will serve to provide a CEQAequivalent document, participation in the BLM EIS process will also provide input into the CEQA review of the Project.

You may submit comments at any time during the preparation of the EIS; however, if you would like to have your comments considered for inclusion in the Draft EIS, comments must be submitted during the Scoping period. You may submit your comments by any of the following methods:

- Submit your written comments directly at any of the public Scoping meetings
- Email comments to blm_az_azso_10WestLink@blm.gov
- Mail comments to Ten West Link Project, Attn: Joe Incardine BLM Arizona State Office; One North Central Avenue, Ste. 800; Phoenix, AZ 85004; or
- Fax comments to Ten West Link Project, Attn: Joe Incardine, (602) 417-9452

In addition to public Scoping meetings, the BLM plans to host an Economic Strategies Workshop to provide an opportunity for regional businesses, governments, and community organizations to discuss regional economic and social conditions and trends related to the proposed Project. The date and location for the workshop will be announced on the BLM website and through invitations to those parties on the Project mailing list.

You can stay informed by using the following information tools:

- Visit the BLM's Project website: www.blm.gov/az/st/en/ prog/energy/10_west_link_transmission.html
- Request your name be added to the Project mailing list, via the comment form or by contacting the BLM, to receive newsletters and Project updates
- For more information regarding the public Scoping meetings or the proposed Project, or to sign up for the mailing list, contact Joe Incardine at (801) 560-7135 or jincardi@blm.gov

The BLM will also keep you informed through regional and local newspapers, and open house meetings later in the process.

If you have any questions about the Project, please contact the BLM National Project Manager, Joe Incardine, at (801) 560-7135. If you require special accommodations at any of the public Scoping meetings, please contact Ellen Carr at Galileo Project by email at ellen.carr@galileoaz.com or at (480) 629-4705.

What are effective comments?

Your participation is an important part of the decision-making process. We need your feedback! The most effective comments are those that provide useful information to the agencies. To make the best use of your input, here are some points to consider when making a comment about the Project:

- Keep your comments focused on the proposed Project and what is being analyzed.
- Comments that raise "issues" are the most helpful. An issue is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect.
- An issue has a cause and effect relationship with the Project, is within the scope of the analysis, and lends itself to scientific analysis rather than conjecture.
- Make sure you submit your comments within the timeframes announced. This ensures that the agencies will have all concerns documented for use in the EIS. Scoping comments must be postmarked by May 9, 2016.

Comments made during Scoping or on the EIS are not counted as votes or as part of a referendum on BLM's or other agencies' decisions on the Project. They are used to improve the document and analyses to adequately determine environmental impacts before the agencies make final decisions on the Project. Therefore, avoid comments that state, "I am in favor of this project," or "I am opposed to this project." Remember that clear, concise, and relevant comments are more effective and useful.

Meeting Locations

The 45-day Scoping period for this proposed Project will occur from March 23 to May 9, 2016. Three Scoping meetings will be held during the Scoping period to provide an overview of the Project, answer questions, and to solicit feedback from the public regarding the Project and potential alternatives. You are invited to attend any of the following public Scoping meetings:

April 12, 2016	April 13, 2016	April 14, 2016
5:30 p.m. – 8:00 p.m.	5:30 p.m. – 8:00 p.m.	5:30 p.m. – 8:00 p.m.
Ruth Fisher Elementary School	Quartzsite Senior Center	Blythe Community Center
38201 W. Indian School Road	40 S. Moon Mountain Ave.	445 N. Broadway
Tonopah, Arizona	Quartzsite, Arizona	Blythe, California
Note: A Spanish in	terpreter will be availab	ble at the meetings.
	spañol estará disponibl tion begins at 6:30 pm e	



Introduction

The Bureau of Land Management (BLM) is the lead federal agency, and the Yuma Field Office is the lead BLM field office in deciding whether public land can be used for the proposed Ten West Link 500 kilovolt (kV) Transmission Line Project that would begin near Tonopah, Arizona and terminate near Blythe, California. DCR Transmission, LLC (DCRT), the Project Sponsor, submitted an application for a right-of-way (ROW) across BLM administered land in Arizona and California. The BLM has determined that this is a major federal action that requires the preparation of an Environmental Impact Statement (EIS).

Multiple decisions will be required for the Project. The decision regarding the proposed ROW is the responsibility of the BLM Yuma Field Manager. However, non-conformance with Visual Resource Management (VRM) Classes along certain portions of the proposed Project and designation of utility corridors would require an amendment to the Yuma Resource Management Plan (RMP), which would be analyzed in the EIS. The BLM Arizona State Director would issue a separate but related decision on the RMP amendment (RMPA). The California Public Utilities Commission (CPUC) - a cooperating agency - is also required under the California Environmental Quality Act (CEQA) to issue its own decision on that portion of the Project in California. The CPUC will ensure that the EIS also meets the requirements of CEQA. Other related decisions will likely be necessary by additional cooperating agencies. These decisions will be identified in the draft EIS.

Overview of the Ten West Link Project

DCRT proposes to construct, operate, and maintain the Project across southwestern Arizona into southern California. The Project would include the construction of a new 500kV transmission line between the Delaney Substation west of Tonopah, Arizona and the Colorado River Substation, west of Blythe, California. The Project would consist of a single-circuit, 500kV, series-compensated transmission line that would largely follow the existing Southern California Edison (SCE) Devers-Palo Verde 500kV transmission line in an established utility corridor. The total length of the proposed Project is 114 miles with approximately 97 miles in Arizona and 17 miles in California. Of the total length, 83 miles are on public land; the majority of the public land crossed would be in Arizona.



All comments must be received by May 9, 2016

Who is the Project Applicant/Proponent?

DCRT, a joint venture company owned by Abengoa Transmission & Infrastructure, LLC, and an affiliate of Starwood Energy Group Global, Inc. proposes to construct, operate, and maintain the Project. DCRT was selected as the Project Sponsor by the California Independent System Operator (CAISO) as part of a competitive solicitation process authorized by the Federal Energy Regulatory Commission (FERC) Order No. 1000 (Transmission Planning and Cost Allocation).

What would the transmission line look like?

The transmission line structures would measure 100 to 195 feet tall. The distance between structures may range from 740 to 2,100 feet, depending on the structure type selected. The ROW grant area would generally measure approximately 200 feet



wide. The type of transmission line structures that would be used would depend on site-specific engineering design and land use constraints. The proposed structures would include a combination of selfsupporting, H-frame, and guyed galvanized steel lattice towers. DCRT has identified several potential route options in the study area that address local routing issues that are being considered. The Project also includes a

transmission line series compensation station located at the approximate midpoint of the route.

How does the Project relate to regional transmission planning?

In the 2013-2014 Transmission Plan, the CAISO identified an economically-driven need for a 500kV transmission line between the SCE-owned Colorado River 500kV Substation and the APS-owned Delaney 500kV Substation. The CAISO evaluates transmission system capacity and reliability needs in California. The CAISO and the other regional entities throughout the western interconnection collaborate during their transmission planning processes to ensure regional transmission stability and efficiency.

What would the Project contribute to the regional energy system?

- ◆ Improve transmission system efficiency The Project would increase the efficiency of the bulk transmission network serving California and the Southwest and would improve deliverability of available energy, decreasing congestion and thus improving transmission system efficiency.
- Enhance access to diverse resources The Project would expand regional access to low-cost, environmentallyfriendly energy generation sources, enabling load serving

entities to use a more diverse, cost-effective set of energy resources to serve the electrical demand in Arizona and California.

- Facilitate development of new renewable energy The Project would create new transmission infrastructure needed to interconnect future renewable energy resources in both Arizona and California to the bulk transmission arid.
- Improve regional collaboration This interstate transmission ٠ line would facilitate efficient and increased sharing of generation resources between the two states thereby enhancing operational flexibility. This would enable both Arizona and California to effectively integrate renewable resources, share reliability services, and increase supply diversity under normal and emergency conditions.
- ♦ Strengthen regional reliability The Project would strengthen the regional transmission system in Arizona and California by adding additional capacity and alleviating grid congestion. A larger, more robust transmission grid would improve energy reliability for the region's consumers.
- Promote regional economic development The Project would provide regional economic benefits by adding new jobs, indirect economic benefits such as secondary spending by those employed by the Project, and property tax revenues.
- Conserve resources The Project would use already developed transmission or utility corridors wherever possible, thereby minimizing visual, environmental, cultural, and other impacts, while maximizing the use of existing access roads and infrastructure.

What is the need for the transmission line?

The Project is primarily driven by the need to provide additional high-voltage electrical transmission infrastructure to increase deliverability of available energy, thereby increasing the efficiency of the transmission network. A secondary benefit is improvement of the reliability of the bulk transmission grid between Arizona and California. The Project would also increase interconnection capability of new renewable energy projects proposing to locate near the Project.

Increased flexibility provided by the transmission network ultimately enhances competition among energy suppliers, which reduces energy costs to customers. Specifically, the Project would have the capacity to transport 3,200 megawatts (MW), allowing for a cost-effective transfer of energy in the southwestern U.S. As previously noted, CAISO justified the need for the Project based on economic benefits associated with enhancing the high-voltage transmission path between the Delaney and Colorado River substations.



What is an EIS? What is the purpose of an EIS?

agencies will use information derived from public Scoping comments to identify potential resource concerns, potential An EIS is prepared for major federal actions that may have a Project modifications and alternatives, and mitigation significant effect on the environment. The purpose of an EIS is to identify potential issues related to the project, analyze the measures that could be used to minimize impacts. The process project impacts, disclose them to the public, and use the will be documented and the impacts disclosed in a Draft EIS. information developed to make informed decisions. The EIS is a After public review of the Draft EIS, comments on the Draft EIS public document, and the public is encouraged to provide will be considered and incorporated into the Final EIS. The BLM input throughout the development of the EIS. Potential and CPUC will issue decisions regarding the Project at the close amendments to existing agency land use plans will be of the NEPA/CEQA process. analyzed as well. The EIS is not a decision document, but it is intended to provide information to the BLM and other agency What is a Resource Management Plan? Why decision makers in order to make informed decisions.



What is the process for preparing an EIS?

There are a number of steps involved in preparing an EIS under the National Environmental Policy Act (NEPA) (see graphic). The EIS process begins with publication of a notice of intent (NOI) in the Federal Register, which initiates the Scoping period (a 45 day comment period). The BLM and cooperating

would an amendment be required?

The BLM develops comprehensive land use plans to guide management decisions and actions on public lands. Land use planning utilizes a collaborative approach with the public, stakeholder groups, and local, state, and tribal governments. The resulting set of land use plans is called an RMP. An RMP addresses the full range of activities that occur on public lands, including energy, rights-of-way that support communications and energy delivery, mineral development, a variety of recreational uses, and crucial habitat for species associated with the area, such as desert tortoise. Non-conformance with VRM Classes along certain portions of the proposed Project would require an amendment to the Yuma RMP.

What is CEQA and how does it relate to the EIS process for the Project?

The CEQA is a statute that requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and to adopt all feasible measures to mitigate those impacts. NEPA and CEQA are similar, both in intent and in the review process that they dictate (the analyses, public engagement, and document participation). A key requirement of both NEPA and CEQA is the analysis of a project's environmental impacts. This analysis can be approached the same way for both, but each law requires certain issues to specifically be addressed. The BLM will include in the EIS all necessary data and analysis and will conduct the NEPA process so that the EIS will also fulfill CEQA environmental review requirements.

The EIS will inform federal, state, and local permitting agencies and cooperating agencies, as well as the public of the Project's environmental impacts. In addition to the federal actions, the Project is expected to require various California state and local agency permits and approvals. These include a Certificate of Public Convenience and Necessity from the CPUC, a Lease from the California State Lands Commission, water quality approvals, and other state and local approvals. These will require review under CEQA. This single environmental review document will be used to support public agency decisions that would be needed to implement the Project.

Welcome

Proposed Ten West Link 500kV Transmission Line Project and Proposed Resource Management Plan Amendment

PUBLIC SCOPING MEETING

5:30 p.m. Welcome & Sign In
5:30 p.m. to 6:30 p.m. Open House
6:30 p.m. to 7:30 p.m. Presentation/Q&A
7:30 p.m. to 8:00 p.m. Open House

UU West Link 500kV Transmission Line Project

NATIONAL SYSTEM OF PUBLIC LANDS U.S. DEPARTMENT OF ATA ADDRESS U.S. DEPARTMENT OF ATA ADDRESS

Welcome

Proposed Ten West Link 500kV Transmission Line Project and Proposed Resource Management Plan Amendment

SCOPING MEETING

IJ West Link 500kV Transmission Line Project

NATIONAL SYSTEM OF PUBLIC LANDS U.S. DEPARTMENT OF ATA ADDRESS U.S. DEPARTMENT OF ATA ADDRESS

Proponent Proposed Project Route







Proposed Project Characteristics

What would the Ten West Link Transmission **Line Look Like?**

- 114 miles of 500kV transmission line would connect the Delaney Substation in AZ to the Colorado River Substation in CA.
- 200 foot-wide right-of-way (ROW) grant requested, most of the proposed route is within an existing utility corridor/adjacent to an existing 500kV line.
- Structures would be a combination of selfsupporting, H-frame, and guyed galvanized steel lattice structures.
- Towers would be 100-195 feet tall and placed 740-2,100 feet apart, depending on site characteristics.





H-Frame Lattice Structure



West Link

500kV

Transmission

Line

Existing Yuma RMP VRM Classes

The majority of the proposed Ten West Link Project would cross public lands managed under the Yuma Resource Management Plan (RMP).

Portions of the proposed route would not conform with Visual Resource Management (VRM) class objectives in the Yuma RMP. The transmission line would create a level of visual change that would not meet the existing VRM class objectives.

Therefore, for the Project to be approved, an amendment to the Yuma RMP would be needed.



BLM Yuma Field Office RMP VRM Classes





NEPA Overview

What is NEPA?

The National Environmental Policy Act (NEPA) of 1969

- Sets forth policy and goals as a means for carrying out environmental analysis, coordination, and collaboration.
- Ensures that federal agencies act in good faith during federal undertakings.
- Provides the interested public and affected agencies the opportunity for input, identification of issues, and offering solutions early in the NEPA process. This is accomplished through scoping and the formal public review of the draft Environmental Impact Statement (EIS).

What is an Environmental Impact Statement?

An EIS is a document prepared to respond to a major federal action and comply with the requirements of NEPA. An EIS is prepared to analyze and disclose the effects of proposed activities, such as the Ten West Link Project, on the environment, and to ensure that reasonable alternatives and mitigation are considered.

What is Scoping?

Scoping occurs early in the process, before the EIS is prepared. Scoping is intended to ensure that relevant issues and concerns are identified early and are properly studied as part of the EIS.



Lead Agency

The BLM is the Lead Agency, responsible for managing the NEPA process and developing the EIS.

Cooperating Agencies

Agencies with jurisdiction and/or special expertise who are participating in the development of the EIS.

BLM's Decisions To Be Made

- Decide whether to amend the Yuma RMP; and then,
- Determine whether or not to grant the ROW application for the Ten West Link Project.









Proponent Proposed Route Photos

Colorado River Substation





Submit Your Comments

Make a Difference

Your comments should...

- 1. Focus on the potential environmental effects, reasonable alternatives, and measures to avoid or lessen environmental impacts.
- 2. Be clear and concise. Relevant comments are more effective and useful, as they will improve the EIS and affect the BLM's decisions. Avoid comments that state, "I am in favor of this project," or "I am opposed to this project."

For more information or if you have further questions contact:

Joe Incardine (801) 560-7135 jincardi@blm.gov

Ways to Submit Comments

Tonight

Submit Comment Form to BLM Staff

US Mail

Ten West Link Project Attn: Joe Incardine **BLM State Office** One North Central Ave, Suite 800 Phoenix, AZ 85004

Email blm_az_azso_10westlink@blm.gov

Fax (602) 417-9452

Comments due by:

May 9, 2016



J

Anticipated Key Resource Issues

The Environmental Impact Statement (EIS) will analyze and disclose potential impacts the proposed Project may have on resources that contribute to the human and natural environment.

The scoping process is intended to collect information from the public, agencies, tribes, etc. to be included in the analysis.

The following key resources are among the resources that will be analyzed:

- Visual Resources
- Biological Resources, including Special Status Species
- Cultural Resources
- Public Health and Safety (including Electromagnetic Fields)
- Land Use, Agriculture, Special Designations, and Wilderness









West Link 500kV Transmission Line Project

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

Purpose and Need

The BLM's purpose is to respond to the rightof-way application for the proposed project. The need is based on the Federal Land Policy and Management Act of 1976, as amended.

Note that an agency's purpose and need is not the same as the applicant's objective for the project.

P.L. 96-487 and Federal Register Notice 5-22-95	APPLICATION FOR TRANSPORTATION AND UTILITY SYSTEMS AND FACILITIES ON FEDERAL LANDS	FORM APPROVED OMB Control Number: 0596-0082 Expiration Date: 1/31/2017
		FOR AGENCY USE ONLY
preapplication meeting with representatives of the age	he applicant should completely review this package and schedule a ncy responsible for processing the application. Each agency may have	Application Number
specific and unique requirements to be met in preparin representative, the application can be completed at the	ig and processing the application. Many times, with the help of the agency e preapplication meeting.	Date Filed
1. Name and address of applicant (include zip o		3. Telephone (area code)
		Applicant
		Authorized Agent
4. As applicant are you? (check one)	5. Specify what application is for: (check one)	
a. Individual	a. New authorization	
b. Corporation*	b. Renewing existing authorization No.	
c. Partnership/Association*	c. Amend existing authorization No.	
d. State Government/State Agency	d. Assign existing authorization No.	
e. D Local Government	e. 🗌 Existing use for which no authorization has been rec	eived *
f. Eederal Agency	f. Other*	
* If checked, complete supplemental page	* If checked, provide details under item 7	
6. If an individual, or partnership are you a citize	m(s) of the United States? Yes No	
8. Attach a map covering area and show locatio	n of project proposal	
	n of project proposal Altached Applied for Not Required	
	Attached Applied for Not Required	
9. State or Local government approval: 10. Nonreturnable application fee: Attact A	Attached Applied for Not Required Not required affect international waterways? Yes No (#"yes," i	
9. State or Local government approval: 10. Nonreturnable application fee: Attact A	Attached Applied for Not Required	





West Link 500kV Transmission Line Project

What is a Cooperating Agency?

The cooperating agency role derives from NEPA, which calls on federal, state, and local governments to cooperate with the goal of achieving "productive harmony" between humans and their environment. Working closely with cooperating agencies will improve communication and understanding, identify common goals and objectives, and enhance the quality of the NEPA process and resulting EIS.

The objectives of cooperating agency participation in the preparation of NEPA analyses include:

- Disclosing relevant information early in the analytical process.
- Applying specialized technical expertise and staff support.
- Avoiding duplication with other federal, state, tribal and local procedures.
- Establishing a mechanism for addressing intergovernmental issues.

To date, the following agencies have expressed interest in participating as a cooperating agency with the BLM on the Ten West Link Project:

- •California Public Utilities Commission
- U.S. Environmental Protection Agency
- Arizona Game and Fish Department
- Arizona State Land Department
- Maricopa Association of Governments
- U.S. Department of Defense

- •LaPaz County

• U.S. Fish and Wildlife Service

West Link 500kV Transmission Line Project



The BLM will use and coordinate the National Environmental Policy Act (Act) commenting process to help with the public involvement requirements of Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) as provided for in 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed Project will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA.

West Link 500kV Transmission Line Project







The BLM will use and coordinate the National Environmental Policy Act (Act) commenting process to help with the public involvement requirements of Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) as provided for in 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed Project will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA.











Project Overview

The Ten West Link Transmission Project is a proposed electrical interconnection that would transmit reliable, economic and environmentally friendly electric energy between Southeast California and Southwest Arizona, bringing electric system benefits to the Desert Southwest – one of America's fastest growing regions. The Project would provide a reliable 500 kV transmission connection between substations in Tonopah, Arizona and Riverside County, California, west of the City of Blythe.

The proposed 114 mile route, with 97 miles in Arizona and 17 miles in California, would minimize land and resource impacts by largely following an existing transmission line in an established utility corridor.



This map identifies the Ten West Link proposed route and alternatives filed with the California Independent System Operator (CAISO). The project team seeks public input on these routes and any additional route options in the identified study area that would meet the project purpose and need and reduce impacts.



About the Team

Ten West Link is a joint venture led by Starwood Energy Group.

Starwood Energy Group

Starwood Energy Group is a private investment firm that specializes in energy infrastructure investments. The Starwood Energy Group team brings extensive development, construction, operations, acquisition and financing expertise to its investments, with a focus on the natural gas and renewable power generation, and transmission sectors.

Ten West Link Team

- Rich Weiss, Senior Advisor Project Manager
- Ali Amirali, Senior VP
- Anna Mayr, Analyst & Project Coordinator
- Emilio Rodriguez Izquierdo, Senior VP Project Manager
- Jen Rouda, VP Environmental Development

Consulting Team

- HDR (environmental)
- Copper State Consulting Group (AZ public engagement)
- Kearns & West (CA public engagement)
- Snell & Wilmer (tribal relations)
- Allen Matkins (CA legal advisor)
- Crowell Moring (CA legal advisor)
- Osborn Maledon (AZ legal advisor)



The Electrical Grid

How Electricity is Transmitted:



- Energy is generated from both renewable and conventional energy sources.
- A substation at the site of electric generation steps up the voltage to transmission level, enabling electricity to travel longer distances.
- Transmission lines carry the electricity from the generation substation to a distribution substation, located closer to electricity users.
- A distribution station then lowers the voltage and transmits the electricity to local distribution lines.
- Local distribution lines carry electricity to business and household consumers.



Siting Philosophy & Planning

The selection of the Ten West Link Transmission Project's route through the NEPA environmental review process is guided by an approach to minimize impacts by following existing corridors wherever possible.

The approach includes:

- Working within or next to existing corridors (such as highways, transmission lines, and roads);
- Minimize overall impacts to sensitive environmental/ cultural areas (e.g., wildlife areas, sensitive riparian





Transmission line adjacent to road

zones, and other areas of environmental or cultural concern) by paralleling the existing line;

- Incorporating information from existing federal and state energy and land use planning efforts;
- Working closely with interested stakeholders and land managers to understand and, where possible, avoid or minimize impacts to sensitive areas
- Considering sensitive resources during engineering design, construction, and future operations and maintenance.



Ten West Link Transmission Project Design



Representative project structures. The project will use a combination of H frame structures (left) and guyed lattice (right).

The Ten West Link transmission line would be 500kV, as are the existing transmission lines in the area.



Project Permitting

The Ten West Link Project will undergo multiple comprehensive permitting and approval processes.

Federal

The Bureau of Land Management (BLM) is the lead federal agency charged with ensuring that the project complies with National Environmental Policy Act (NEPA) requirements.

BLM will coordinate with these and potentially other federal entities:

- Colorado River Indian Tribe
- Federal Aviation Administration
- U.S. Army Corps of Engineers
- U.S. Bureau of Indian Affairs
- U.S. Department of Defense

- U.S. Bureau of Reclamation
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- Western Area Power Administration

AZ & CA

The Ten West Link Transmission Project team anticipates coordinating with many, if not all, of the following state-level permitting and regulatory agencies:

- Arizona Corporation Commission
- Arizona Department of Environmental Quality
- Arizona Department of Transportation
- Arizona Game and Fish Department
- Arizona State Land Department
- California Department of Fish and Wildlife
- California Public Utilities Commission
- California State Lands Commission (CEQA Lead Agency)
- Colorado River Regional Water Quality Control Board

Local

The Ten West Link Transmission Project team will comply with all applicable local permitting requirements, including coordination with the appropriate entities in the following counties:

- La Paz County, AZ
- Riverside County, CA

• Maricopa County, AZ



Project Timeline

	2015	Public engagement to develop route; Project Routing; Initiation of Permitting Processes
2	015-201	 Public engagement to inform route development Early public meetings to share information and receive input on potential route alternatives Federal, State and Local Permitting Processes
		 Bureau of Land Management initiates the NEPA process (the federal environmental review process) Public meetings for NEPA Ongoing public outreach and involvement Ongoing permitting with federal/state/local governments/agencies, as appropriate California CEQA review Arizona Corporation Commission Certificate of Environmental Compatibility review
	2017	 Permitting, Land Acquisition, and Engineering Permitting complete Right-of-way acquisition and engineering
2	018-201	9 Project Construction • Construction begins
	2020	• Construction is completed



Why This Project Is In The Public Interest

Enhances Access to Diverse Resources

The Ten West Link expands regional access to low-cost, environmentally-friendly energy generation sources, enabling load serving entities to use more diverse, cost-effective energy resources to serve the electrical demand in Arizona and California.

Facilitates Development of New Renewable Energy

The Ten West Link will create new transmission infrastructure needed to effectively interconnect and efficiently integrate future renewable energy resources in both Arizona and California to the bulk transmission grid.

State Renewable Energy Requirements



Data Source: DSIRE current CA+AZ renewable portfolio standard map data

While the Ten West Link Transmission Project is not linked to the development of any particular energy generation projects, the study area includes multiple high-quality renewable resource areas where generation project development is likely.



Why This Project Is In The Public Interest

Enhances Access to Diverse Resources

Ten West Link expands regional access to low-cost, environmentally-friendly energy generation sources, enabling load serving entities to use a more diverse, cost-effective set of energy resources to serve the electrical demand in Arizona and California

Facilitates Development of New Renewable Energy

Ten West Link will create new transmission infrastructure needed to interconnect future renewable energy resources in both Arizona and California to the bulk transmission grid.

Improves Regional Collaboration

This interstate transmission line will facilitate efficient and increased sharing of generation resources between the two states thereby enhancing operational flexibility. This will enable both Arizona and California to effectively integrate renewable resources, share reliability services and increase supply diversity under normal and emergency conditions.

Strengthens Regional Reliability

Ten West Link will strengthen the regional transmission system in Arizona and California by adding additional capacity and alleviating grid congestion. A larger, more robust transmission grid will improve energy reliability for the region's consumers.

Promotes Regional Economic Development

Ten West Link will provide regional economic benefits by adding new jobs, indirect economic benefits such as secondary spending by those employed by the project, and property tax revenues.

Conserves Resources

Ten West Link will use already developed transmission or utility corridors wherever possible, thereby minimizing visual, environmental, cultural, and other impacts, while maximizing the use of existing access roads and infrastructure.


Your Participation

Today

- Speak with a project team member
- Provide direct input on project maps
- Fill out a comment card

Anytime

- Email us: info@tenwestlink.com
- Call us: 844-Ten-West (844-836-9378)

For More Information

- Visit us at www.tenwestlink.com
- Sign up for email updates



Access the sign-up form on our website

Fill out a comment card with a request to sign-up



Your Participation

Please submit written comments here. Thank you for providing feedback today.



Stay up to date at www.tenwestlink.com

Appendix D – Meeting Attendance

Meeting attendance: (Non-staff/BLM)

Agency – 25 Tonopah – 19 Quartzsite – 16 Blythe – 14

Invitation Letter Mailings:

<u>Hardcopy</u> Agency – 199 recipients (March 30, 2016) Tribes – 20 recipients (March 30, 2016) Public – 778 recipients (March 31, 2016)

<u>Emails</u>

Agency (initial email) – 108 recipients (March 29, 2016) Agency (follow-up email) – 118 recipients (April 6, 2016) Public (initial email) – 101 recipients (March 30, 2016) Public (follow-up email) – 103 recipients (April 7, 2016)

List of Tribes:

Agua Caliente Band of Cahuilla Indians Ak Chin Indian Community of the Maricopa Indian Reservation Augustine Band of Cahuilla Indians Cabazon Band of Mission Indians Chemehuevi Tribe of the Chemehuevi Indian Reservation Cocopah Tribe of AZ Colorado River Indian Tribes of the Colorado River Indian Reservation Fort McDowell Yavapai Nation Fort Mojave Tribe of AZ Quechan Tribe of the Fort Yuma Indian Reservation Gila River Indian Community of the Gila River Indian Reservation Hopi Tribe of AZ Morongo Band of Mission Indians Salt River Pima-Maricopa Indian Community of the Salt River Reservation San Manuel Band of Mission Indians Soboba Band of Luiseño Indians Torres Martinez Desert Cahuilla Indians Twenty-Nine Palms Band of Mission Indians Yavapai-Apache Nation of the Camp Verde Indian Reservation Yavapai-Prescott Indian Tribe

Appendix E – Scoping Comment Matrix

Ten West Link EIS Scoping Comment Codes

Air Quality	AQ	Proposed Action	PA
Alternatives	ALT	Public Health and Safety	PUB
Cultural Resources	CR	Purpose and Need	PN
Cumulative Effects	CE	Recreation	REC
Environmental Justice	EJ	Section 106 Consultation	106
General	GEN	Socioeconomics	SOC
Geology, Mineral Resources, Soils, and Paleontology	GEO	Transportation	TRAN
Greenhouse Gases	GHG	Tribal Treaty Rights	TRIB
Hazardous Materials and Hazardous and Solid Waste	HAZ	Vegetation Communities, Including Special Status	VEG
Johnson Canyon	JC	Visual Resources	VIS
Kofa NWR	KOF	Water Resources	WTR
Land Use, Agriculture, and Special Designations	LU	West-wide Energy Corridor	WEC
Mitigation	MIT	Wilderness or Lands with Wilderness Characteristics	WILD
NEPA Process	NEPA	Wildlife (not special status)	WLF
No Action Alternative	NA	Wildlife Special Status	WLFSS
Noise	NOI	Yuma Proving Ground	YPG
Out of Scope	OS		

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
1	1	Frank Bergwell		AZ	Consumers of energy should keep corporations that produce energy in business.	SOC	
1	2	Frank Bergwell		AZ	The transmission corridor is senior in rights to the Kofa NWR.	GEN	KOF
1	3	Frank Bergwell		AZ	The cumulative effects of expanding the energy corridor can be mitigated.	CE	
1	4	Frank Bergwell		AZ	The employees and managers of the Kofa NWR need electricity too.	PN	
2	1	Yong Paik			Transmission lines are beneficial to all.	GEN	
2	2	Yong Paik			There is not enough information or the information provided is hard to understand.	NEPA	
3	1	Carol Stimson		AZ	There is not enough information or the information provided is hard to understand.	NEPA	
3	2	Carol Stimson		AZ	The Quartzsite area is popular for RV camping and the transmission line would negatively affect that.	REC	
3	4	Carol Stimson		AZ	The transmission line should go north of the Kofa NWR and stay in existing utility corridor.	ALT	
4	1	John C. Sanders		AZ	I object to the proposed alternate route through Johnson Canyon.	ALT	JC
4	2	John C. Sanders		AZ	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC
5	1	Dale F. George			The Johnson Canyon is very scenic and includes some of the most technical OHV riding on the entire Arizona Peace Trail.	REC	JC
5	2	Dale F. George			I object to the proposed alternate route through Johnson Canyon.	ALT	JC
6	1	James Rinehart		WY	I object to the proposed alternate route through Johnson Canyon.	ALT	JC

¹ Some statements were edited for grammar or clarity.

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
6	2	James Rinehart		WY	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC
6	3	James Rinehart		WY	Construction of a transmission line and road would detract from the scenery and riding experience on the Arizona Peace Trail, an adventure recreation loop trail system developed by the BLM and Arizona Game & Fish.	REC	
6	4	James Rinehart		WY	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the recreational opportunities in western Arizona.	REC	JC
6	5	James Rinehart		WY	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the economic opportunities in western Arizona.	SOC	JC
7	1	Douglas Ross		AZ	I object to the proposed alternate route through Johnson Canyon.	ALT	JC
7	2	Douglas Ross		AZ	Johnson Canyon is the only westerly route available on the Arizona Peace Trail.	REC	JC
8		John C. Sanders		AZ	COMMENT FORM, DUPLICATE OF LETTER SENT AND RECORDED AS RESPONSE ID #4.		
9	1	Robert Arring			I object to the proposed alternate route through Johnson Canyon.	ALT	JC
9	2	Robert Arring			Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
9	3	Robert Arring			Construction of a transmission line and road would detract from the scenery and riding experience on the Arizona Peace Trail, an adventure recreation loop trail system developed by the BLM and Arizona Game & Fish.	REC	
10	1	William Schuman			The transmission line would negatively affect my property values.	SOC	
10	2	William Schuman			No one would want to build a house in the vicinity of a transmission line because they would not want to see a transmission line.	VIS	SOC
10	3	William Schuman			I could not have a campground, other recreational businesses, or have horses on my property because of the negative health effects from transmission lines.	PUB	
10	4	William Schuman			We would not want to live, camp, or board horses near a transmission line.	GEN	
10	5	William Schuman			Land near a transmission line would be useless and have no economic value.	SOC	
10	6	William Schuman			I should receive market value for my property from the applicant.	SOC	
11	1	Darryll Ritz	Arizona Peace Trail, Inc.	AZ	I object to the proposed alternate route through Johnson Canyon.	ALT	JC
11	2	Darryll Ritz	Arizona Peace Trail, Inc.	AZ	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC
11	3	Darryll Ritz	Arizona Peace Trail, Inc.	AZ	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the economic opportunities in western Arizona.	SOC	JC
11	4	Darryll Ritz	Arizona Peace Trail, Inc.	AZ	Having the transmission line along the existing line would be less of an impact to the area.	ALT	

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
12	0	John C. Sanders		AZ	COMMENT FORM, DUPLICATE OF LETTER SENT AND RECORDED AS RESPONSE ID #4. ONE ADDITIONAL COMMENT ADDED ON THIS VERSION RECORDED AS 12.1 AND 12.2.		
12	1	John C. Sanders		AZ	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the recreational opportunities in western Arizona.	REC	JC
12	2	John C. Sanders		AZ	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the economic opportunities in western Arizona.	SOC	JC
13	1	William Wilson	Bouse Ghost Riders	NV	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC
13	2	William Wilson	Bouse Ghost Riders	NV	The Johnson Canyon portion of the Arizona Peace Trail is the only way to complete the trail to the southwest through to Yuma.	REC	JC
13	3	William Wilson	Bouse Ghost Riders	NV	Johnson Canyon should be kept as it is.	GEN	JC
14	1	Bruce Fuller	Arizona Sunriders	ID	The Johnson Canyon portion of the Arizona Peace Trail is the only way to get to the Colorado River area without going through the CRIT reservation or the Yuma Proving Ground.	REC	JC
14	2	Bruce Fuller	Arizona Sunriders	ID	Johnson Canyon is one of the more technical OHV routes in this area.	REC	JC
15	1	Bonnie Fuller	Arizona Sunriders	ID	I support another transmission line in the area.	GEN	
15	2	Bonnie Fuller	Arizona Sunriders	ID	I object to the proposed alternate route through Johnson Canyon.	ALT	JC
15	3	Bonnie Fuller	Arizona Sunriders	ID	Construction and maintenance of a transmission line through Johnson Canyon would affect OHV riders, miners, and metal detectors.	REC	JC

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
15	4	Bonnie Fuller	Arizona Sunriders	ID	The Johnson Canyon portion of the Arizona Peace Trail is the only way to get to the Colorado River area without going through the CRIT reservation or the Yuma Proving Ground.	REC	JC
15	5	Bonnie Fuller	Arizona Sunriders	ID	Johnson Canyon should be kept as it is.	GEN	JC
16	1	Jason Gerdes	EPA Region IX	СА	The Draft EIS should clearly identify the underlying purpose and need for the project and for which alternatives 'are being proposed (40 CFR 1502.13). When formulating the need, identify and describe the underlying problem, deficiency, or opportunity that the action is meant to address. The purpose then defines the measurable objectives to be used for evaluating the effectiveness of potential alternatives toward meeting the need.	PN	
16	2	Jason Gerdes	EPA Region IX	СА	Reasonable alternatives should include, but are not necessarily limited to, alternative configurations and routes for the transmission line. The Draft EIS should provide a discussion of the reasons for the elimination of alternatives which are not evaluated in detail. A reasonable range of alternatives will include options for avoiding environmental impacts. The Council on Environmental Quality regulations for implementing the National Environmental Policy Act state that alternatives should include appropriate mitigation measures not already included in the proposed action or alternatives (40 CFR 1502.14(f)).	ALT	
16	3	Jason Gerdes	EPA Region IX	СА	The Draft EIS should estimate the quantity of water the project will require during the construction phase and during operations. Describe the source of this water and potential effects on other water users.	WTR	
16	4	Jason Gerdes	EPA Region IX	СА	If groundwater will be used, the potentially-affected groundwater basin should be identified and impacts to groundwater recharge, springs or other surface water bodies and biologic resources should be analyzed.	WTR	
16	5	Jason Gerdes	EPA Region IX	СА	The Draft EIS should include a discussion of cumulative impacts to groundwater resources within the hydrographic basin, including reasonably foreseeable impacts from other projects that have been proposed.	CE	WTR

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
16	6	Jason Gerdes	EPA Region IX	CA	Available technologies to minimize or recycle water should be identified.	WTR	
16	7	Jason Gerdes	EPA Region IX	CA	Any landscaping around buildings should utilize xeric native plants.	VEG	
16	8	Jason Gerdes	EPA Region IX	CA	The Draft EIS should address the potential effects of project discharges on surface and groundwater quality, including wastewater discharges from any office or maintenance buildings and discharge of dewatering water.	WTR	
16	9	Jason Gerdes	EPA Region IX	СА	The project applicant should coordinate with the U.S. Army Corps of Engineers to determine if the proposed project requires a Section 404 permit under the Clean Water Act.	WTR	
16	10	Jason Gerdes	EPA Region IX	CA	The Draft EIS should describe all Waters of the US (WOTUS) that could be affected by the project alternatives, and include maps that clearly identify all waters within the project area, including ephemeral drainages. The discussion should include acreages and channel lengths, habitat types, values, and functions of these waters.	WTR	
16	11	Jason Gerdes	EPA Region IX	СА	If a 404 permit is required, the project must comply with <i>Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials</i> (40 CFR 230), promulgated pursuant to Section 404(b)(l) of the CWA ("404(b)(l) Guidelines"). Pursuant to 40 CFR 230, any permitted discharge into WOTUS must be the least environmentally damaging practicable alternative available to achieve the project purpose. The Draft EIS should include, and craft NEPA alternatives consistent with, evaluating project alternatives in this context, in order to demonstrate the project's compliance with the 404(b)(l) Guidelines. If, under the proposed project, dredged or fill material would be discharged into WOTUS, the Draft EIS should discuss alternatives to avoid those discharges.	ALT	WTR
16	12	Jason Gerdes	EPA Region IX	CA	The Draft EIS should commit to the use of natural washes, in their present location and natural form and with adequate natural buffers, for flood control to the maximum extent practicable.	WTR	

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
16	13	Jason Gerdes	EPA Region IX	CA	Because placement of transmission line tower foundations and access roads could result in erosion, migration of channels and local scour, the transmission line route should avoid washes if practicable to minimize direct and indirect impacts to the washes. The potential damage that could result from disturbance of flat-bottomed washes includes alterations to the hydrological functions that natural channels provide in arid ecosystems: adequate capacity for flood control, energy dissipation, and sediment movement, as well as impacts to valuable habitat for desert species.	WTR	
16	14	Jason Gerdes	EPA Region IX	СА	The Draft EIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards and nonattainment areas, and potential air quality impacts of the project, including cumulative and indirect impacts, for each fully evaluated alternative.	AQ	
16	15	Jason Gerdes	EPA Region IX	CA	Emissions should be estimated for the construction phase and the operational phase.	AQ	
16	16	Jason Gerdes	EPA Region IX	СА	Mitigation measures, both applicant proposed mitigation measures and Bureau of Land Management proposed mitigation measures, for construction emissions, fugitive dust and operations should be discussed. Typical mitigation measures include construction emission reductions, fugitive dust control measures, mobile and stationary source controls and administrative controls.	MIT	AQ
16	17	Jason Gerdes	EPA Region IX	СА	Impacts to biological resources can be substantial in desert habitats.	WLF, VEG	
16	18	Jason Gerdes	EPA Region IX	СА	Efforts to preserve vegetation and habitat should be pursued. In arid areas, disturbed vegetation is slow to recover. Practices that preserve habitat, minimize weed invasion, and prevent erosion should be incorporated into the project.	VEG	

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
16	19	Jason Gerdes	EPA Region IX	CA	The potential impacts of construction, installation, and maintenance activities on habitat and species should be discussed in the Draft EIS.	VEG	
16	20	Jason Gerdes	EPA Region IX	CA	The potential impacts of construction, installation, and maintenance activities on habitat and species should be discussed in the Draft EIS.	WLF	
16	21	Jason Gerdes	EPA Region IX	CA	The Draft EIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. The Draft EIS should identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the Endangered Species Act. We recommend that the Bureau of Land Management consult with the U.S. Fish and Wildlife Service and, if required, prepare a Biological Opinion under Section 7 of the ESA if there are threatened or endangered species present. The Draft EIS should provide a recent status update of this report if this action has been or will be undertaken.	VEG	WLFSS
16	22	Jason Gerdes	EPA Region IX	CA	 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 will 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. 	VEG	WLFSS
16	23	Jason Gerdes	EPA Region IX	CA	The Draft EIS should indicate what measures will be taken to protect important wildlife habitat areas from potential adverse effects of proposed activities.	WLFSS	

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16	24	Jason Gerdes	EPA Region IX	CA	Executive Order 13112, <i>Invasive Species</i> (February 3, 1999), mandates that federal agencies whose actions may affect the status of invasive species shall use their relevant authorities to prevent their introduction, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. The Draft EIS should describe how the project will meet the requirements of E.O. 13112. The EPA recommends including an invasive plant management plan for the monitoring and control of noxious or invasive weeds.	VEG	
16	25	Jason Gerdes	EPA Region IX	СА	The Draft EIS should describe the methodology used to assess cumulative impacts. We recommend the methodology developed jointly by the EPA, the Federal Highway Administration, and the California Department of Transportation, available at: http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm. While this methodology was developed for transportation projects, the principles and steps in this guidance offer a systematic way to analyze cumulative impacts for any project.	CE	
16	26	Jason Gerdes	EPA Region IX	CA	The analysis of cumulative impacts should consider other projects, in addition to other developments in the area and general resource trends, on the resources that would be affected by the proposed project.	CE	
16	27	Jason Gerdes	EPA Region IX	CA	We recommend thorough discussions of cumulative impacts to water resources and biological resources.	CE	
16	28	Jason Gerdes	EPA Region IX	СА	The EPA believes the Council on Environmental Quality (CEQ) December 2014 revised draft guidance for Federal agencies' consideration of Green House Gas emissions and climate change impacts in NEPA outlines a reasonable approach, and we recommend that the Bureau of Land Management use that draft guidance to help outline the framework for its analysis of these issues.	GHG	

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16	29	Jason Gerdes	EPA Region IX	CA	The Draft EIS should include an estimate of the GHG emissions associated with the project and qualitatively describe relevant climate change impacts.	GHG	
16	30	Jason Gerdes	EPA Region IX	CA	The Draft EIS should analyze reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions.	GHG	ALT
16	31	Jason Gerdes	EPA Region IX	CA	The Draft EIS should address the appropriateness of considering changes to the design of the proposal to incorporate GHG reduction measures and resilience to foreseeable climate change. The Draft EIS and Final EIS should make clear whether commitments have been made to ensure implementation of design or other measures to reduce GHG emissions or to adapt to climate change impacts.	GHG	ALT
16	32	Jason Gerdes	EPA Region IX	CA	The Draft EIS should address potential direct, indirect and cumulative impacts of waste generation, including hazardous waste, from construction and operation. The document should identify projected waste types and volumes and identify expected storage, disposal, and management methods. Identify the applicability of federal and state hazardous and solid waste requirements. The generation of hazardous waste should be minimized.	HAZ	
16	33	Jason Gerdes	EPA Region IX	СА	Above ground transmission line projects that disturb desert soil may have impacts on the health of nearby residents, including valley fever and other respiratory complaints. The Draft EIS should assess potential exposures to the fungus <i>Coccidioides</i> that could result from soil-disturbing activities of the project, and the susceptibilities of workers and nearby residents to Valley Fever.	PUB	

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16	34	Jason Gerdes	EPA Region IX	СА	Consideration should be given to include, in the Draft EIS, an Environmental Awareness Program to be implemented for the workers and a notification plan for the nearby residents. The worker training should include training on the health hazards of Valley Fever, how it is contracted, what symptoms to look for, proper work procedures, how to use personal protective equipment, the need to wash prior to eating, smoking or drinking and at the end of the shift, and the need to inform the supervisor of suspected symptoms of work-related Valley Fever. The training should identify those groups of individuals most at risk and urge individuals to seek prompt medical treatment if Valley Fever symptoms (flu-like illness with cough, fever, chest pain, headache, muscle aches, and tiredness) develop.	PUB	

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16	35	Jason Gerdes	EPA Region IX	CA	The EPA recommends the DEIS include specific mitigation measures and a Mitigation Monitoring and Reporting Program. Mitigation measures are generally effective if they contain the following: Why: state the objective of the mitigation measure and why it is recommended; What: Explain the specifics of the mitigation measure and how it will be designed and implemented and identify measurable performance standards by which the success of the mitigation can be determined and provide for contingent mitigation as appropriate if monitoring reveals that the success standards are not satisfied; Who: Identify the agency, organization or individual responsible for implementing the measure; Where: Identify the specific location of the mitigation measure; When: Timing and schedule for implementation. We recommend that all mitigation measures and the Mitigation Monitoring and Reporting Program be adopted in the ROD and be included as conditions in construction contracts and any other approvals or enforceable agreements(such as final design approval or enforceable terms, conditions and stipulations in the ROW grant), as appropriate, to minimize adverse environmental impacts to the greatest extent possible.	MIT	
17	1	Tice Supplee	Audubon Arizona	AZ	The project description incorrectly says the 83 miles in Arizona is on public lands managed by the BLM. Over 25 miles of the proposed route in Arizona is on the Kofa National Wildlife Refuge.	GEN	KOF
17	2	Tice Supplee	Audubon Arizona	AZ	The Kofa National Wildlife Refuge was established for the conservation of wildlife resources. Routing a powerline through the refuge is not compatible with the Kofa National Wildlife Refuge mission and purpose. We recommend that this routing alternative should be discarded.	ALT	KOF

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
17	3	Tice Supplee	Audubon Arizona	AZ	BLM should consider a route alternative in the West Wide Energy Corridor 30-52 and include such an alternative in the Draft EIS. WWEC 30-52 is an area earmarked for transmission that is expected to have relatively low environmental impact. Corridor 30-52 was analyzed by the Sonoran Institute in a 2015 report that concluded "the 30-52 corridor, a West-Wide Energy Corridor (WWEC) as identified in Section 368 of the National Energy Policy Act of 2005, provides comparably low-impact alternatives to portions of the Palo Verde-Devers 2 line that was rejected by the Arizona Corporation Commission in 2008."	ALT	WEC
17	4	Tice Supplee	Audubon Arizona	AZ	The proposed route in Arizona crosses numerous microphyll woodland washes that are important nesting habitat for desert birds, including but not limited to black-tailed gnatcatcher, Phainopepla, verdin, Bell's vireo, Lucy's warbler, Crissal thrasher, LeConte's thrasher.	WLF	
17	5	Tice Supplee	Audubon Arizona	AZ	The vegetation includes larger growth forms of mesquite, paloverde, hackberry, ironwood, wolfberry, and graythorn.	VEG	
17	6	Tice Supplee	Audubon Arizona	AZ	BLM recently identified mitigation lands for the impact of solar energy development in this same landscape. The impacts of the Ten West Link should also include identification of suitable mitigation lands, ideally adjacent to those areas already identified.	MIT	
17	7	Tice Supplee	Audubon Arizona	AZ	The Colorado River and the many microphyll woodland washes that will be crossed by this route are significant bird migration corridors, particularly in the spring. Design of the towers and guy wires should consider reduction of bird strike hazards, particularly at the Colorado River crossing. A 2014 meta-analysis of studies of bird strikes on power lines concluded that between 12 and 64 million birds are killed each year at U.S. power lines and that "bird mortality at U.S. power lines constitutes a major source of anthropogenic mortality.	WLF	
17	8	Tice Supplee	Audubon Arizona	AZ	Construction should avoid the primary nesting season for desert birds from January –April.	MIT	WLF

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17	9	Tice Supplee	Audubon Arizona	AZ	InJune, 2007, the Arizona Corporation Commission denied a Certificate of Environmental Compatibility to Southern California Edison for what was essentially the same line (Devers-Palo Verde #2) on the grounds that it contributed little to the citizens of Arizona, leading to is abandonment. Ten-West Link will be challenged to demonstrate its importance to the citizens of Arizona and California, in particular its ability to stimulate and carry responsible renewable energy generation. BLM should critically evaluate the purpose of this line and if it truly "facilitates development of new renewable energy," as stated by the applicant.	PN	OS
18	1	James Garrison	Arizona SHPO	AZ	We look forward to receiving the Section 106 consultation for this project.	CR	106
19	1	Peter Potochney	DOD	DC	The proposed route could conflict with military operations and training.	LU	YPG
20	1	William Van Houten	DOD	DC	The proposed route could conflict with military operations and training.	LU	YPG
20	2	William Van Houten	DOD	DC	In order to mitigate for conflicts with military operations and training, project structures should be no taller than 199 feet above the ground surface and be marked with night vision compatible red lighting, emitting an infrared energy between 675 and 900 nanometers.	MIT	РА
20	3	William Van Houten	DOD	DC	The route should not cross the Yuma Proving Grounds because it would interfere with military operations and training.	LU	YPG
21	1	Leigh J. Kuwanwisiwma	Hopi Tribe	AZ	The Hopi Cultural Preservation Office requests consultation on any proposal on the Yuma Field Office that has the potential to affect prehistoric sites. Therefore, we look forward to continuing consultation on the Class I and Class II cultural resources survey of the area of potential effect. In addition, if any prehistoric sites in Arizona are identified that will be adversely affected by project activities, we will request continuing consultation including receiving a copy of any proposed treatment plans for review and comment.	CR	106

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
22	1	Leigh J. Kuwanwisiwma	Hopi Tribe	AZ	We reiterate that we look forward to continuing consultation on the Class I and Class II cultural resources survey of the area of potential effect. In addition, if any prehistoric sites in Arizona are identified that will be adversely affected by project activities, we will request continuing consultation including receiving a copy of any proposed treatment plans for review and comment.	CR	106
23	1	Randy Murray	Yuma Proving Ground, DOD	AZ	Several of the routes along the northeast boundary of YPG impose an unacceptable risk to mission and we request Copper Bottom D, E, F and G routes be removed from the alternatives analysis and consideration in this project.	ALT	YPG
23	2	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom A route proximity to the installation boundary with an existing transmission line and corridor which does cross onto YPG landspace at the NE corner. As long as the corridor is not expanded to the south, it does not pose an impact to our mission.	ALT	LU
23	3	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom B route (with or without adding a utility corridor) proximity to the installation boundary is acceptable and does not pose an impact to our mission.	ALT	LU
23	4	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom C route (with or without adding a utility corridor) proximity to the installation boundary is acceptable and does not pose an impact to our mission.	ALT	LU
23	5	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom D route (with or without adding a utility corridor) does pose an impact to our mission. Our concerns are based on the following: 250 feet from the YPG boundary for approximately 1 mile 1,000 feet from YPG boundary for 2.4 miles Average distance from YPG boundary is 500 feet (9 towers) Requires use of YPG roads to access the canyon south of the radio tower (existing access road 4,000 feet south of the YPG border for 2.89 miles a n d n ew spur roads on the eastern end for 4,200 linear feet) 	ALT	LU

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
23	6	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom E route (with or without adding a utility corridor) does pose an impact to our mission. Our concerns are based on the following: 250 feet from the YPG boundary for approximately 1 mile Aligned within 1000 feet of YPG boundary for 6.8 miles Average distance from YPG boundary is 500 feet (22 towers) Requires use of YPG roads to access the canyon south of the radio tower (existing access road 4,000 feet south of the YPG border for 2.89 miles, segments of new spur roads on the eastern end (totaling 2,100 linear feet) 	ALT	LU
23	7	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom F route (with or without adding a utility corridor) does pose an impact to our mission at the point it joins and runs along the same location and route as Copper Bottom D. Our concerns are as stated for Route D above.	ALT	LU
23	8	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom G route (with or without adding a utility corridor) does pose an impact to our mission at the point where G intersects with E on the NW corner of the landspace. Alteration of the route to the north would not impact our mission as long as all access roads and right of ways remain off our landspace.	ALT	LU

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
23	9	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom Alternative D, E, F and G will affect test mission and management of environmental/cultural resources as follows: Environmental Compliance: Roads identified for use are not public roads. Many are access trails for mission and administrative purposes. Increased use of these roads and off-road migration will trigger compliance with the Clean Water Act, consultation with Native Americans, potential impacts to Cultural Resources (petroglyphs and prehistoric relics), and natural resources (habitat for the Sonoran desert tortoise and golden eagle nesting areas). 	TRAN	LU
23	10	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom Alternative D, E, F and G will affect test mission and management of environmental/cultural resources as follows: Range Transients: Use of roads that border or enter YPG from the north will increase range transient encroachment from ATV riders, unauthorized hunters, and other unauthorized off-road adventurers on the northern border. Currently unauthorized personnel adversely impacting ECM testing is increasing, with more testing of this nature being anticipated, range transients become more problematic. 	TRAN	LU

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
23	11	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom Alternative D, E, F and G will affect test mission and management of environmental/cultural resources as follows: Frequency: Unmanned Aerial Systems, Electronic Counter Measures (ECM) programs, and future programs could be impacted with reduced radio frequency quality or may be unable to perform testing due to interference in data collection or operations. Impact on communications will vary. The impact on lower frequencies (under 1,000 MHz) is approximately 1 kilometer. A frequency study is required to determine exact impact of higher frequencies (over 1,000 MHz) and we request the transmission output and frequencies of the powerline to conduct this study. 	ALT	LU
23	12	Randy Murray	Yuma Proving Ground, DOD	AZ	 Copper Bottom Alternative D, E, F and G will affect test mission and management of environmental/cultural resources as follows: Security: Location of Alternatives D and E will also provide line-of sight into the range, creating an unacceptable security risk and mission impact. 	ALT	LU
24	1	Holly Irwin	La Paz County Board of Supervisors	AZ	The La Paz County Board of Supervisors strongly requests that the Bureau of Land Management (BLM) analyze the incremental cumulative effects from all of the Federal policies that continue to exacerbate a fiscally challenged County. The resulting financial challenges being experienced currently by La Paz County are directly tied to inequities in how current federal policies continue to ignore the cumulative impacts from all of these different activities that result in nothing positive for La Paz County or our residents. In fact, it makes it more difficult for the County government to be a sustainable jurisdiction, since these property developments continue to decrease the County's available tax base and circumvents planning for future opportunities.	CE	SOC

SCOPING COMMENT		NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
LETTER ID	ID						
24	2	Holly Irwin	La Paz County Board of Supervisors	AZ	The BLM, which controls more than half of the land area of La Paz County, appears to ignore negative impacts that burden our local economy and ultimately hurts our residents; the very people whose taxes support the federal government. While our Board wants to be cooperative, the possible negative impacts to our economic future means that the County will be forced to utilize whatever resources are available, including administrative, political or legal.	SOC	

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24	3	Holly Irwin	La Paz County Board of Supervisors	AZ	 The following activities (including the 10 West Link siting process currently underway) will increase the negative fiscal, social and environmental impacts and undermine the County's ability to sustain itself through tax revenues in the long-term. The cumulative impacts from these efforts by the Federal government to remove even more property from the tax base or to take advantage of the majority of property owned by the Federal government with little concern to the local economy are onerous to the County in a number of ways including: Loss of property taxes, Loss of developable property for expanding residential, commercial and industrial development, Decreasing quality of life for residents due to deteriorating social services like schools, fire, sheriff etc, Lowering bonding capacity, Decreasing tourism revenues due to more limited access to recreational assets, Depressed multiplier impacts on local small businesses and corresponding local economy, Aesthetic quality of the County's overall pristine, desert environment, The potential for loss of property values, and An undermining of future economic development options. 	SOC	CE

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
24	4	Holly Irwin	La Paz County Board of Supervisors	AZ	Primarily frustrating is the historic and continuing lack of transparency when properties are developed with other entities, purchased and/or transferred to the BLM, exchanged between federal agencies like the US Military, and/or exchanged with Arizona State Lands or other Agencies where we lack any communication or input. It makes it worse when we don't even know about these actions, creating gaps in our current maps. While environmental impacts are often considered because of legislative or regulatory mandates, the social and economic impacts are ignored, or at best, glossed over with little to no stakeholder involvement. In fact, while federal agencies continue to have influence and input into ultimate decision making that affects future land use in La Paz County, barely any consideration is paid to how each of these independent actions further limit our local leadership's ability to manage our resources in a sustainable manner.	OS	

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24	5	Holly Irwin	La Paz County Board of Supervisors	AZ	Currently, there are a number of federal policies or processes that will continue to create stress to our local economy if the BLM continues to ignore the net cumulative impacts from the activities listedbelow: 1.) The BLM's current scoping for a 500 kv transmission line (bid by CAISO) to improve grid reliability, build capacity and reduce the price for renewable energy for ratepayers outside LA County. How will these environmental, social or economic benefits accrue locally in any meaningful way to the County government or its tax payers? 2.) The BLM identified thousands of acres next to Brenda as a potential Solar Enterprise Zone (SEZ) with the intent to remove this future proposed expansion property to support residential development to help build the County's tax base. What properties are the BLM willing to trade for removing almost 2000+ acres for the SEZ zone? 5.) The Bill Williams River "poker game" trade-off that involved the U.S. Department of the Interior as Trustee for the Hualapai Tribe, USDOE, Arizona Game and Fish Commission, Arizona Department of Water Resources and Freeport Minerals Corporation, with the result being the removal of this very unique and environmentally valuable property from the County's tax base. For this particularly extreme example of the Federal government inflicting negative damage to the on- going stability of our jurisdiction in La Paz County, there was no effort to involve our elected leaders or the residents in what was a major property transaction that will forever change the landscape of our region.	CE	SOC

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24	6	Holly Irwin	La Paz County Board of Supervisors	AZ	Expected and soon to be proposed, in-kind or out-of-kind mitigation strategies for both the Ten West Link Project and Solar SEZ zone will require the identification of thousands of additional acres as set aside habitat for species impacts, which potentially removes even more land from our dwindling tax base or takes away available recreational assets that promote tourism. Is the BLM prepared to go outside the County for these properties so as not to further isolate the local government from economic development options?	SOC	
24	7	Holly Irwin	La Paz County Board of Supervisors	AZ	It isn't clear if the military or the US Fish and Wildlife Agency are going to support the proposed route for the Ten West Link. Does the US Military or US Fish and Wildlife position on the route selection process carry more influence than the local government?	NEPA	

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24	8	Holly Irwin	La Paz County Board of Supervisors	AZ	Almost insolvent since its inception, La Paz County was established without enough taxable assets for the County government, schools or other social services to be sustainable. In the mid 1980's and with less than 6% privately owned land in the County, private property purchases by metropolitan Phoenix communities constituted another blow to our fledgling County by removing thousands of acres of land from its' already low tax base compared to the rest of the State. These land purchases were made quickly and prior to laws that would regulate transfers of water across basins. Currently, there are barely any protections in place for rural governments that had no say in these transactions. The same reckless disregard for local impacts from actions taken by powerful political entities continues to flourish today. The County Board of Supervisors is currently dealing with this major problem in other political forums as it affects our groundwater and the over-drafting of County resources by international corporations disinterested in the County's future sustainability. Our residents' wells are running dry and local government has no remedy to help them.	OS	
24	9	Holly Irwin	La Paz County Board of Supervisors	AZ	Unfortunately, the current federal policies related to following a strict process to approve almost a one hundred + mile utility corridor through the middle of La Paz County serves to heighten the negative impacts to our ability to provide basic government services with schools, fire districts and the sheriff's department, since there is no mechanism to provide for revenues from these projects that will instead be paid to the Federal government or for local mitigation. It is unfair that we continue to be penalized and affected by the constantly deteriorating tax base because of the loss of property taxes and dwindling economic development opportunities.	SOC	

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24	10	Holly Irwin	La Paz County Board of Supervisors	AZ	The Board of Supervisors requests that together we identify a pathway to proactively address the inequities from the BLM and other Federal Agency actions to create a win-win situation so that these land use plans do not disproportionally affect our local jurisdiction.	GEN	EJ
24	11	Holly Irwin	La Paz County Board of Supervisors	AZ	We encourage the BLM to share the goal of cooperating with La Paz County to create economic annuity streams as a partner in renewable energy projects being sited in our County as the first step towards for our continued cooperation and engagement in these approval processes. Will the BLM assist La Paz County in also participating in the revenues being generated by national policies promoting more renewable energy generation?	OS	

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24	12	Holly Irwin	La Paz County Board of Supervisors	AZ	La Paz County needs to benefit financially from renewable energy projects located within the County borders. From a conceptual standpoint, La Paz County wants to be in a position to own and lease a large site that would host a 300+MW project that would interconnect to the 10 West Transmission Line. With that goal in mind, we have identified a large parcel of property that is relatively disturbed, is proximate to the proposed route(s), and is not in a sensitive environmental location. Will the BLM agree to transfer 3,500+ acres to support the development of a 350 MW project to interconnect with the Ten West Project's schedule? I have requested a meeting with John MacDonald, Field Manager of the Yuma BLM office and want to have this meeting as soon as possible to ascertain the cooperation that we could expect in terms of assisting the County in acquiring a 3,500 acre property that could support a solar PV development. The level of cooperation and assistance from both the Yuma and Phoenix BLM offices to support this goal will ultimately drive the tenor of La Paz County's continued involvement in the siting process for the Ten West line.	OS	

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24	13	Holly Irwin	La Paz County Board of Supervisors	AZ	Will the economic, cultural and/or social analysis of the impacts from the proposed 10 West Link Project specifically address impacts solely <u>within</u> the County's borders? The Board of Supervisors finds it highly disingenuous that the BLM uses a regional analysis that includes economies as far away as Riverside and Yuma Counties when the bulk of this project takes place within the boundaries of La Paz County's service territory. These impacts include job creation both during and after construction, goods and services plus multiplier effects and any other social or economic values that would incur to the local economy.	SOC	
24	14	Holly Irwin	La Paz County Board of Supervisors	AZ	There are limited if not negative impacts from the 10 West line and that an appropriate analysis will justify fees paid to the County to offset these negative impacts. Some of the negative impacts immediately obvious are visual impacts, loss of residential property impacts, property value impacts, right of way and easement tensions created locally and stress to local services like sheriff, fire etc., as well as a host of other impacts.	SOC	
24	15	Holly Irwin	La Paz County Board of Supervisors	AZ	Once species of concern are identified for mitigation, will the BLM go outside the County's border or stay inside designated wilderness zones to search for mitigation acreage? Sonoran Desert Tortoise eco-systems cover the range of land that may include properties in eleven of Arizona's fifteen counties. The BLM should add value to the lands already set aside and make these more productive from an environmental habitat or eco-system habitat or go outside the County to identify property that would otherwise become unavailable for future use. This removes the burden of continuing to isolate and remove recreational or possible economic development properties in La Paz County.	MIT	WLF

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
24	16	Holly Irwin	La Paz County Board of Supervisors	AZ	What are the total project economics; i.e. what are the total net present value estimates of what the US Treasury will receive via rents and lease fees over the life time of the project? Also, what is the total value of the project in the form of electricity to the State of CA and State of AZ? These annuity streams must include both the permitted life as well as the realistic life whereby most of these major transmission lines are still operable decades after their initial term.	SOC	
24	17	Holly Irwin	La Paz County Board of Supervisors	AZ	The La Paz County Board of Supervisors would like to better appreciate how much mitigation fees will be paid locally to offset impacts from the project to the CRIT or other organizations? Will these fees also include mitigation for negative impacts to the County for the reasons listed above?	MIT	
24	18	Holly Irwin	La Paz County Board of Supervisors	AZ	In the case of the Solar SEZ zone, the BLM was silent on La Paz County's critique of their local analysis with no process mechanism to compensate La Paz County from taking property that was clearly in the path of residential development.	OS	
24	19	Holly Irwin	La Paz County Board of Supervisors	AZ	Many local groups are commenting that the Ten West Line needs to avoid Johnson Canyon. What technical solutions are being proposed to accomplish this goal?	ALT	JC
24	20	Holly Irwin	La Paz County Board of Supervisors	AZ	Many residents and tourists in La Paz County consider recreational access on BLM property to be an important environmental right.	REC	
24	21	Holly Irwin	La Paz County Board of Supervisors	AZ	We encourage the BLM to consider technical approaches that would allow the Ten West Line to be in the Devers Right- of-Way through this particular geography.	ALT	
24	22	Holly Irwin	La Paz County Board of Supervisors	AZ	The least impacts overall to our residents and our juri sdiction is for the route to parallel the Devers right of way.	GEN	PA
24	23	Holly Irwin	La Paz County Board of Supervisors	AZ	We support the proponent's desire to parallel the Devers line.	GEN	PA

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
24	24	Holly Irwin	La Paz County Board of Supervisors	AZ	If the proposed route is not selected, then La Paz County requests that the BLM consider having the Ten West Line located south of Interstate 10 in the Energy Corridor if both the KOFA and Yuma Proving Grounds reject the application for using the Devers Right of Way as a passage.	ALT	WEC
24	25	Holly Irwin	La Paz County Board of Supervisors	AZ	This pathway would be in close proximity to the property that La Paz County has identified for a plan amendment to host a solar PV project.	OS	
24	26	Holly Irwin	La Paz County Board of Supervisors	AZ	In addition, it means less private land would need to be crossed, which lessens the risk of having to use imminent domain policies in the event that property owners are opposed to granting a right of way.	ALT	SOC
24	27	Holly Irwin	La Paz County Board of Supervisors	AZ	The La Paz County Board of Supervisors seeks a mutually acceptable path forward with the BLM whereby our concerns are addressed in an atmosphere of sensitivity as to how these incremental, "one-off" projects, add up to a burden for the County and our residents. These incremental impacts are all connected actions that require analysis to better appreciate the negative future implications for our economic stability and sustainability.	CE	SOC
24	28	Holly Irwin	La Paz County Board of Supervisors	AZ	Our ability to replicate similar renewable energy project business models like those created in Nevada for Counties with similar characteristics, provides an avenue to correct our perceived lack of fairness that is inherent to the process of siting a transmission line on BLM property within the legal boundaries of La Paz County with no remedy to collect revenues or benefit.	OS	
25	1	William Knowles	Arizona Game and Fish Department	AZ	The Department further understands that the proposed route would largely follow the existing Palo Verde Devers 500 kV Transmission Line 1 (PVDI). We note that this route crosses Kofa National Wildlife Refuge and would require approval from the Refuge.	GEN	РА

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
25	2	William Knowles	Arizona Game and Fish Department	AZ	The Department has accessed and attached the report from the Department's Heritage Data Management System (HDMS)'s On-line Review Tool for the review of your project. We request that Species of Greatest Conservation Need (SGCN) and Species of Economic and Recreational Importance (SERI) identified in the report, be included in your list of Special Status Species for the project area. The SGCN and SERI species were identified in the State Wildlife Action Plan which is used to inform management decisions, including but not limited to land management agencies decisions.	WLF	
25	3	William Knowles	Arizona Game and Fish Department	AZ	There are two areas of special interest to the Department, the Plomosa Mountains and Cooper Bottom Pass in the Dome Rock Mountains. We request that the Department, as a cooperating agency, be consulted with prior to developing alternative routes in these areas.	WLF	ALT
25	4	William Knowles	Arizona Game and Fish Department	AZ	The Plomosa Mountains provide habitat for a number of wildlife species, including bighorn sheep, mule deer and nesting Golden Eagles and other raptor species. The healthy population of bighorn sheep has been used in the recent past as a source population for the Department's efforts to reintroduce sheep into historic habitats.	WLF	
25	5	William Knowles	Arizona Game and Fish Department	AZ	The Cooper Bottom Pass area, which also supports a number of wildlife species, is relatively pristine with roadless areas.	WLF	
25	6	William Knowles	Arizona Game and Fish Department	AZ	It is the Department's policy to seek compensation for actual or potential habitat losses resulting from land and water projects at a 100% level, where feasible. This policy is explained in our Department Operating Manual, Section I, Chapter 2.3. It is the Department's preference that impacts to wildlife be avoided or minimized to minimize potential mitigation. As a cooperating agency, the Department is prepared to work with BLM and DCR to avoid or minimize impacts to wildlife and wildlife habitat.	ALT	WLF
SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
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25	7	William Knowles	Arizona Game and Fish Department	AZ	The West Wide Energy Corridor, which parallels Interstate 10 through most of the study area, is a potential alternative route. Because of the proximity to the existing Interstate, this alternative will have minimum impacts to wildlife.	ALT	WEC
25	8	William Knowles	Arizona Game and Fish Department	AZ	If proposed ground disturbance (both temporary and permanent) will exceed 0.25 acre, a Native Plan Inventory should be conducted to identify, record, and coordinate plant salvage efforts for species that are protected under the Arizona Native Plan Law. The Arizona Department of Agriculture administers the Arizona Native Plant Law.	VEG	
25	9	William Knowles	Arizona Game and Fish Department	AZ	The Department's fisheries biologists have observed that electrofishing surveys fail to roll flathead catfish under the PVDI Colorado River crossing.	WLF	
25	10	William Knowles	Arizona Game and Fish Department	AZ	The A10 backwater, south of the existing line, contains and is stocked with the endangered razorback suckers. It is not known if transmission lines affect razorback suckers.	WLF	
25	11	William Knowles	Arizona Game and Fish Department	AZ	To minimize the risk of impacting the suckers, the line crossing should be placed away from the A10 backwater on the Colorado River.	ALT	WLF
25	12	William Knowles	Arizona Game and Fish Department	AZ	Research has shown that raptors will use transmission lines and poles as hunting perches. This is prevalent in open areas, such as deserts and agriculture, with few trees for perches. The construction of the transmission line may impact raptor prey species populations. The use of raptor perch deterrents should be considered as a method to reduce the impact.	MIT	WLF
25	13	William Knowles	Arizona Game and Fish Department	AZ	Collisions with transmission lines is a source of avian species mortality. Lines across aquatic habitats are considered to have a high risk of collisions. Large bodied birds that have poor maneuverability such a herons and pelicans are especially vulnerable. The Colorado River crossing may have impacts to avian species. The use of markers to reduce the number of collisions should be considered.	MIT	WLF

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25	14	William Knowles	Arizona Game and Fish Department	AZ	The creation of a new service road for line construction and maintenance will also have impacts to wildlife and wildlife habitats. A new road will result in habitat loss and can create erosion problems. Unfortunately, illegal route proliferation often occurs off of new routes. At-grade crossings of desert washes can have impacts to the wash. Desert washes are high value wildlife habitat. The use of existing roads should be considered to minimize impacts.	ALT	WLF
25	15	William Knowles	Arizona Game and Fish Department	AZ	The construction of this transmission line creates the opportunity for the development of utility scale solar facilities along the line's route. The impacts to wildlife and wildlife habitat should be analyzed in the cumulative effects analysis.	CE	WLF
25	16	William Knowles	Arizona Game and Fish Department	AZ	As part of the ongoing Sonoran pronghorn recovery efforts an Endangered Species Act Section 10j experimental non- essential population is being established on the Kofa National Wildlife Refuge. Individuals have been observed in the vicinity of the proposed line. Potential impacts to the pronghorn should be analyzed.	WLF	
25	17	William Knowles	Arizona Game and Fish Department	AZ	The construction of the line and the use of the service road has the potential to introduce invasive species into the area. Best management practices should be developed to minimize the risk of introducing invasive species.	MIT	VEG
25	18	William Knowles	Arizona Game and Fish Department	AZ	The Department flies low level fixed wing and helicopter surveys throughout the study area. There is a risk of aircraft-transmission line collisions. The Department provided DCR a shapefile of current transects. We request that the line be marked to lower the risk of collisions.	MIT	
26		Erik Bakken	Tucson Electric Power	AZ	See comments under Ian Dowdy 26.1-26.3		
26		Alex Daue	Wilderness Society	СО	See comments under Ian Dowdy 26.1-26.3		
26		Robert Peters	Defenders of Wildlife	AZ	See comments under Ian Dowdy 26.1-26.3		

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26	1	Ian Dowdy	Arizona Solar Working Group c/o Sonoran Institute	AZ	The proposed project would provide significant, new capacity in an area of transmission congestion in the state.	PN	
26	2	Ian Dowdy	Arizona Solar Working Group c/o Sonoran Institute	AZ	Proposing a new transmission line across the Kofa NWR will be a concern to many environmental and conservation group, similar to the concerns related to the D2PV line.	ALT	KOF
26	3	Ian Dowdy	Arizona Solar Working Group c/o Sonoran Institute	AZ	The WWEC 30-52 should be considered as an alternative route, at least for the portions proposed to go through the Kofa NWR.	ALT	WEC
27	1	Dennis Patch	Colorado River Indian Tribes	AZ	The need for coordination among BLM state offices and other federal and state agencies is especially important because the proposal is to build a transmission line from Tonopah, Arizona, to Blythe, Cal ifornia .Given our experiences with the varying levels of outreach from the California and Arizona BLM Offices, we have concerns as to BLM's ability to adequately coordinate between offices to make sure that information is communicated in a timely and consistent manner. Moreover, communications on this Project must not circumvent consultation requirements. Consultation must take place with appropriate tribal governing bodies. Also, "consultation" is defined as "the process of seeking, discussing, and considering the views of other participants, and where feasible, seeking agreement with them" 36 C.F.R . § $800.16(t)$. In other words, although we understand that there are many participants in the review process and coordination is needed, general meetings and form letters there is no substitute for government-to-government consultation with the tribes.	G2G	

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27	2	Dennis Patch	Colorado River Indian Tribes	AZ	For the preservation of our footprint on the land, the Colorado River Indian Tribes believes in avoidance of cultural resources during ground disturbing activities, and if avoidance is infeasible, in situ reburial of artifacts. This is especially because the Tribe's Mohave members strongly associate artifacts with the ancestors who used them, consequently, disturbing them is taboo. Also, steps must be taken to protect cultural resources during all phases of construction activities. For example, because of permanent damage to a prehistoric rock ring circle in connection with the Devers Palo Verde Transmission Line in California, we are painfully aware that heavy equipment operation can cause irreversible damage to priceless and sensitive cultural resources.	CR	
27	3	Dennis Patch	Colorado River Indian Tribes	AZ	Given the Project area, Tribes must be i nvol ved early on in the preparation and review of ethnographic studies and archaeological survey work. The Tribes also request copies of all studies and surveys as soon as they are completed in order to have an opportunity for review and comment.	CR	
28		Sandy Bahr	Sierra Club Grand Canyon Chapter	AZ	See comments under Robert Peters 28.1-28.35		
28		Paul Roetto	Friends of Saddle Mountain		See comments under Robert Peters 28.1-28.35		
28		Craig Weaver	Tonopah Area Coalition		See comments under Robert Peters 28.1-28.35		
28		Barbara Hawke	Arizona Wilderness Coalition	AZ	See comments under Robert Peters 28.1-28.35		
28		Ileene Anderson	Center for Biological Diversity	CA	See comments under Robert Peters 28.1-28.35		
28		Nancy Meister	Yuma Audubon Society	AZ	See comments under Robert Peters 28.1-28.35		

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28	1	Robert Peters	Defenders of Wildlife	DC	We recognize the need for an effective, redundant energy grid that uses clean renewable energy to supply needed power while reducing greenhouse gas emissions and limiting the threats posed by global climate change. But energy projects must be "smart from the start," meaning that they are planned to avoid, minimize, and effectively mitigate for negative impacts to our wildlife, plant communities, and other sensitive resources. Some projects will not be appropriate because they are unnecessary or because environmental costs will be too high, and even worthy projects will not be appropriate everywhere on the landscape. Thorough review under the National Environmental Policy Act of 1969 (NEPA) and state line-siting regulations and processes are essential for determining which proposed projects should be permitted to go forward. Especially close scrutiny is warranted for the Ten West Link line because, as proposed, it would impact areas of high conservation value, including the Kofa NWR and Bureau of Land Management (BLM) lands containing important wildlife habitat and other resources.	GEN	WLF
28	2	Robert Peters	Defenders of Wildlife	DC	The BLM must take a hard look at ways to avoid, minimize, or, as a last result, compensate for harmful effects on wildlife, wilderness values, recreation, and other natural and cultural resources.	GEN	
28	3	Robert Peters	Defenders of Wildlife	DC	Our analysis of the proponents' preferred route through the Kofa NWR indicates that this route would cause excessive environmental harm compared to other routes and should be discarded. This route would not be compatible with the purpose of the refuge.	ALT	KOF
28	4	Robert Peters	Defenders of Wildlife	DC	We urge that the BLM consider a route alternative in West Wide Energy Corridor 30-52 and include such an alternative in the Draft Environmental Impact Statement (DEIS). WWEC 30-52 is an area earmarked for transmission that we expect to have relatively low environmental impact.	ALT	WEC

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28	5	Robert Peters	Defenders of Wildlife	DC	In the era of Renewable Portfolio Standards and the Clean Power Plan, BLM should devote permitting resources only to powerline projects whose Purpose and Need are genuinely aligned with renewable energy transmission.	PN	
28	6	Robert Peters	Defenders of Wildlife	DC	Although the proponent's website states that the project "facilitates development of new renewable energy," it provides no substantiating information. Projects that do not make a major contribution to renewable energy should face greater scrutiny with regards to environmental impacts and whether they are essential for stability of the energy grid.	PN	OS
28	7	Robert Peters	Defenders of Wildlife	DC	We note that in June, 2007, the Arizona Corporation Commission denied a Certificate of Environmental Compatibility to Southern California Edison for what was essentially the same line (Devers-Palo Verde #2) on the grounds that it contributed little to the citizens of Arizona, leading to its abandonment. Therefore, DCR Transmission will be challenged to demonstrate that circumstances have changed sufficiently to make this line important to the citizens of Arizona and California, in particular its ability to stimulate and carry responsible renewable energy generation. The BLM should take a hard look at whether need for the line justifies the amount of ecological and other disturbance.	PN	OS
28	8	Robert Peters	Defenders of Wildlife	DC	BLM should independently determine if the purpose and need for the project, as stated by the applicant, is specific, accurate and reasonable. As part of this determination, BLM should rely, in part, on determinations by the Arizona Corporations Commission as well as the California Independent Systems Operator.	PN	OS

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28	9	Robert Peters	Defenders of Wildlife	DC	The BLM must conduct a comprehensive purpose and need assessment that analyzes whether 1) the project significantly contributes to meeting energy needs in Arizona and/or California, 2) whether the line would help generators meet California's deliverability requirements for out-of-state renewable energy resources, 3) whether the energy shipped on the line would be cost-competitive and the project would be economically viable, 4) whether the line would reduce current congestion and increase reliability, 5) and whether there would be sufficient capacity in the Colorado River Substation to Devers lines to carry load delivered by Ten West Link.	PN	OS
28	10	Robert Peters	Defenders of Wildlife	DC	BLM should analyze the current and future spare capacity on the existing and upgraded transmission lines from the Colorado River Substation to Devers in California. This is especially important to analyze given the expanding development of solar energy facilities in the East Riverside Solar Energy Zone, all of which will transmit electricity to load centers in southern California via the Colorado River Substation to Devers transmission line.	PN	OS
28	11	Robert Peters	Defenders of Wildlife	DC	The California Energy Commission's Renewable Energy Transmission Initiative project in California recently reported that the existing spare capacity for energy only on the East Riverside and Palm Springs transmission system is 4,754 MW. When the above projects are fully on line, the spare capacity will be reduced to approximately 584 MW. This assumes that the 800 MW from the Desert Sunlight and Genesis facilities have not been accounted for in determining existing spare capacity on the line. Furthermore, additional solar projects are likely to be proposed and developed in the East Riverside Solar Energy Zone under provisions of the Desert Renewable Energy Conservation Plan in California, resulting in full utilization of the capacity of the existing Southern California transmission lines.	PN	

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28	12	Robert Peters	Defenders of Wildlife	DC	The Ten West Link Draft Environmental Impact Statement must fully analyze wildlife and other natural resource conflicts along the route of all considered alternatives.	GEN	WLF
28	13	Robert Peters	Defenders of Wildlife	DC	Throughout the line a comprehensive study must be done on possible effects on threatened and endangered species, species of special national, state or agency concern, native protected plants and invasive plants, wilderness and recreation values, cultural resources, and other values.	GEN	WLF
28	14	Robert Peters	Defenders of Wildlife	DC	The Kofa NWR contains at least 13 plant species protected under Arizona's Native Plant Law. In California, five rare plants that are state species of concern are also known from the habitats that the proposed transmission line transverses, including Harwood's milkvetch (<i>Astragalus insularis</i> var. <i>harwoodii</i>), California list 2B.2, gravel milkvetch (<i>Astragalus sabulonum</i>), California list 2B.2, Harwood's eriastrum (<i>Eriastrum harwoodii</i>) California list 1B.2, Abram's spurge (<i>Euphorbia abramsiana</i>) California list 2B.2 and the rough- stalked witch grass (Panicum hirticaule ssp. hirticaule) California list 2B.1. The DEIS should identify locations of such protected plants throughout the extent of the line and the project plan should include measures to avoid, minimize, or effectively mitigate harm done. Specific activities to be analyzed include land-clearing and construction for towers, maintenance roads, and other infrastructure, as well as ongoing impacts during post-construction maintenance. Areas of high plant concentration should be avoided.	VEG	

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28	15	Robert Peters	Defenders of Wildlife	DC	Construction and use of roads would facilitate invasion of nonnative plants, including buffalo grass, Sahara mustard, Bermuda grass, Russian thistle, and red brome, all now present on the refuge and other places along the proposed alignments. Such nonnative plants can increase fuel load and the frequency and severity of fires, thereby threatening native desert species like cactus and Sonoran desert tortoise that are not adapted to frequent, intense fires. At the present time, these invasive plants are more abundant near roads on Kofa NWR and other places, and also extend out from roads.	VEG	
28	16	Robert Peters	Defenders of Wildlife	DC	More than 80 percent of Kofa NWR is wilderness, and the existing power line runs close to the wilderness boundary. Addition of a second power line and associated access roads has the potential to harm wilderness values of naturalness, undeveloped quality, and opportunities for primitive recreation and solitude in wilderness. Construction and maintenance activities can facilitate invasion by exotic weeds and the presence of access roads can facilitate incursions by unauthorized motor vehicles. The BLM must evaluate the impact of such effects.	LU	WILD
28	17	Robert Peters	Defenders of Wildlife	DC	BLM must update its inventory of Lands with Wilderness Characteristics for all areas traversed by the line. This is particularly important as BLM Resource Management Plans in the subject areas were completed prior to implementation of BLM's implementation of the updated 2012 Lands with Wilderness Characteristics Policy 6320.	LU	WILD
28	18	Robert Peters	Defenders of Wildlife	DC	The DEIS should evaluate the probability that birds will be killed by hitting the line, as well as methods of mitigation. A 2014 meta-analysis of studies of bird strikes on power lines concluded that between 12 and 64 million birds are killed each year at U.S. power lines and that "bird mortality at U.S. power lines constitutes a major source of anthropogenic mortality.	WLF	

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28	19	Robert Peters	Defenders of Wildlife	DC	Desert bighorn sheep are found in many mountains where the line might be located, including Kofa NWR and immediately north and south of I-10. Because sheep usually remain near steep slopes so they can escape predators, direct impacts on habitat may be small if the transmission line is built in flatlands. However, associated roads and human activity could prevent travel by sheep from one habitat block to another, or could exclude sheep from areas near the line given that human activity can cause sheep to avoid an area.	WLF	
28	20	Robert Peters	Defenders of Wildlife	DC	A study of decline of desert bighorns in the Santa Catalina Mountains of Arizona concluded that human disturbance was a major factor leading to habitat abandonment. The 2006 compatibility determination by the Kofa NWR for the then- proposed Southern California Edison transmission line stated that "disturbances associated with construction may result in reduced reproductive success or mortality of young desert bighorn sheep as a result of abandonment.	WLF	
28	21	Robert Peters	Defenders of Wildlife	DC	Reintroduction of bighorn sheep has been a major, expensive focus of the Arizona Game and Fish Department and cooperating agencies, so care should be taken not to jeopardize this investment. For example, the budget for the ongoing reintroduction of sheep into the Santa Catalina Mountains is \$674,800 over 5 years. Some populations of desert bighorn sheep have been faring poorly and may be vulnerable to additional stress. The Kofa NWR herd crashed from 800 individuals in 2000 to fewer than 400 by 2006 and has not yet fully recovered.	WLF	KOF

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28	22	Robert Peters	Defenders of Wildlife	DC	There is another critical area for bighorn sheep near the Delaney Substation at the eastern end of the proposed line. The Saddle Mountain Area of Critical Environmental Concern (ACEC) south of I-10 is an important lambing area and is connected by ADOT/AGFD linkage 64 to bighorn habitat north of I-10. The sheep travel back and forth using concrete culverts under the freeway. There are already three high voltage lines north-south paralleling the culvert, one being built last year, and their presence and associated human activity may already hinder the sheep's ability to cross under I- 10. Adding a fourth high voltage line, as per the proponent's proposed route, would add to the cumulative disturbance. The BLM needs to thoroughly analyze the effect of an additional line on the bighorn population and analyze whether the alternative route segment heading due west of the Delaney Substation would cause less harm to the sheep population.	WLF	
28	23	Robert Peters	Defenders of Wildlife	DC	BLM should do a thorough analysis of each line segment for desert bighorn sheep.	WLF	
28	24	Robert Peters	Defenders of Wildlife	DC	In 2013, endangered Sonoran pronghorn were reintroduced to Kofa NWR and the Kofa refuge herd now numbers more than 100 individuals. Pronghorn use habitat both on and off the refuge, and they have been sighted in the area where the proponent proposes to run the Ten West Link line. Plans are to increase the herd to more than 150 animals, so pronghorn use of the proposed line area is likely to increase. Sonoran pronghorn are nomadic, for example moving upslope during hot, dry weather, so they require unimpeded access to varied habitats. Pronghorn are notably sensitive to human disturbance, avoiding areas where humans are present. Because the existing transmission line and pipelines in the refuge are aging, they require increasing access by maintenance workers. A new parallel line would add to human disturbance, both during and after construction.	WLF	KOF

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28	25	Robert Peters	Defenders of Wildlife	DC	The presence of endangered pronghorn is a compelling reason for FWS to find this new proposed transmission line incompatible with the purpose of Kofa NWR.	ALT	KOF
28	26	Robert Peters	Defenders of Wildlife	DC	BLM should carefully analyze possible effects of the proposed line on Sonoran pronghorn both on and off the refuge, taking into account areas for possible future pronghorn reintroduction and habitat expansion.	WLF	
28	27	Robert Peters	Defenders of Wildlife	DC	The Sonoran desert tortoise (<i>Gopherus morafkai</i>) is a species of special concern in Arizona, and it is found on the Kofa refuge and BLM land. In California the proposed alignment appears to traverse occupied habitat for the federally threatened Mojave desert tortoise (<i>Gopherus agasizii</i>). Predation of young desert tortoises is known to increase substantially in the presence of power lines because they provide observation perches for ravens and other predatory birds. Tortoises and their burrows can also be crushed during construction and food plants destroyed. BLM should require surveys for and use the results of these surveys to analyze effects on desert tortoise near any proposed line segments.	WLF	
28	28	Robert Peters	Defenders of Wildlife	DC	The Mojave fringe-toed lizard is a California state Species of Special Concern. In order to minimize harm to the lizard and to the sand transport corridors important for the lizard's habitat and movements, the Ten West Link line should share corridors with existing transmission infrastructure. During construction and operation of the Colorado Rivers substation, significant mortalities of Mojave fringe-toed lizards were documented despite the implementation of avoidance measures including enforced speed limits, vehicle escorts and other avoidance measures. Compensation for unavoidable impacts should be consistent with compensatory mitigation standards established by the California Department of Fish and Wildlife (CDFW).	WLF	

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28	29	Robert Peters	Defenders of Wildlife	DC	Burrowing owls are continuing to decline in California. Burrowing owls are known from the general area of the proposed alignment in California and surveys must be performed in accordance with the state's protocols for burrowing owls. If burrowing owls are identified on site, at least one alternative should evaluate the reduction of impacts to this rare species by moving the project away from the nesting burrows. Additionally, acquisition lands may be required as part of the mitigation and will need to be managed in perpetuity for conservation. Additional measures for avoidance and minimization should also be incorporated into the evaluation of impacts to this species.	WLF	
28	30	Robert Peters	Defenders of Wildlife	DC	Badgers and kit foxes are California Species of Special Concern found in the vicinity of the proposed route. Both species are experiencing unprecedented impacts from development of their habitat in California, and kit foxes are also being harmed by canine distemper outbreaks associated with development projects. BLM should survey for the species, analyze impacts on the species and avoid impacts to the species.	WLF	
28	31	Robert Peters	Defenders of Wildlife	DC	Other California rare wildlife species that are State Species of Special Concern are known from the general proposed project area and include the loggerhead shrike (<i>Lanius ludoviciana</i>), Couch's spadefoot toad (<i>Scaphiopus couchii</i>), crissale thrasher (<i>Toxostoma crissale</i>) and LeConte's thrasher (<i>Toxostoma lecontei</i>). Surveys must be done for these species and the results of these surveys used as a basis for the impact analysis.	WLF	
28	32	Robert Peters	Defenders of Wildlife	DC	Routing the proposed Ten West Link line through Kofa NWR is contrary to the mission and management standards established in the National Wildlife Refuge System Improvement Act of 1997.	ALT	KOF

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28	33	Robert Peters	Defenders of Wildlife	DC	In 2007 the then-refuge manager issued a finding that the DPV2 line proposed by Southern California Edison through the refuge was incompatible with the purpose of the refuge according to the Refuge System organic act and implementing regulation and policy on compatibility, although this Compatibility Decision was later reversed by the regional director. The DPV2 line would have followed essentially the same route proposed by the Ten West Link proponents. As described above, there are now even more reasons to avoid building the line through the refuge, including potential effects on endangered Sonoran pronghorn and the cumulative disturbance on the refuge from the construction of towers, spur roads, and ongoing maintenance that would increase over time.	ALT	KOF
28	34	Robert Peters	Defenders of Wildlife	DC	The DEIS must include a route alternative that utilizes WWEC 30-52. In considering and analyzing such a route, the BLM must take care to identify and offset impacts to wildlife habitat linkages and corridors in the region.	ALT	WEC
28	35	Robert Peters	Defenders of Wildlife	DC	For WWEC 30-52 or any other alternate route, it will be essential to identify wildlife corridors where populations connect, avoiding them where possible, and compensating when avoidance is impossible. Mitigation would consist of keeping dispersal corridors open that are permeable to the most focal species possible. Two projects that have identified areas for corridors include the Desert Renewable Energy Conservation Plan (DRECP) and the Arizona's Wildlife Linkages Assessment.	ALT	WLF
29	1	Helen O'Shea	Natural Resources Defense Council	СА	BLM needs to consider a corridor in the WWEC system as an alternative to the proposed Ten West Link project route. BLM, along with numerous other stakeholders, invested extensively in the identification and designation of the WWEC system. We recommend that BLM take advantage of the knowledge, effort, and time that was already spent in planning and screening this existing corridor system.	ALT	WEC

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29	2	Helen O'Shea	Natural Resources Defense Council	CA	The currently proposed Ten West Link transmission corridor route runs from Tonopah, Arizona west to Blyth, California, cutting through the northern half of the Kofa NWR on its way. This route has a controversial history and attempts to site new transmission lines through the Kofa NWR have been opposed by environmental organizations and agencies for several years. Potentially significant time delays and cost increases would likely accompany another attempt to site a major transmission project through the Kofa NWR.	ALT	KOF
29	3	Helen O'Shea	Natural Resources Defense Council	CA	The proposed route ignores potentially lower-conflict alternative corridors, including the pre-screened WWEC 30- 52 along Interstate 10. This alternative route would avoid impacts to the sensitive habitats and public values of the Kofa NWR and would help BLM to comply with its own policies regarding prioritization of siting new transmission projects within the WWEC system.	ALT	WEC
29	4	Helen O'Shea	Natural Resources Defense Council	CA	BLM has invested years of effort and significant resources into planning and designating the WWEC system, and NRDC is encouraged by BLM's progress in working to create a system of useful corridors that help develop renewable energy resources while minimizing impacts to sensitive public resources. Given the effort BLM has extended into the development of the WWEC, we believe BLM should fully consider the WWEC 30-52 route along Interstate 10 as an alternative to the proposed Ten West Link route. While the WWEC system may still require significant changes and additional analyses, some of the existing, identified corridors appear to be viable alternatives worth serious consideration.	ALT	WEC

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29	5	Helen O'Shea	Natural Resources Defense Council	CA	We are concerned about the currently proposed route because it is not only a poorly sited corridor, but it represents a step backwards from the progress and principles for which both NRDC and BLM have long-advocated and embraced. Indeed, by completely ignoring its earlier planning work, BLM is undermining its own effort and investment, as well as those of many other stakeholders, in the WWEC designations. Instead, if BLM carefully evaluates and seriously considers the alternative route through WWEC 30-52, Ten West Link could be an opportunity to demonstrate the promise and value of the WWEC network.	ALT	WEC
29	6	Helen O'Shea	Natural Resources Defense Council	СА	BLM has designated western Arizona, the California Desert and southern Nevada as its first priority region for review of the WWEC designations. WWEC 30-52 is part of this region, and offers an opportunity to leverage BLM's investment in the system's reevaluation under the terms of the settlement to consider opportunities for Ten West Link in corridor 30-52. Importantly, WWEC 30-52 was not identified as a Corridor of Concern in the WWEC settlement agreement, and recent research and analysis by a number of stakeholders in the region has not identified any "fatal flaws" along the corridor.	ALT	WEC
29	7	Helen O'Shea	Natural Resources Defense Council	CA	There are resources and values within WWEC 30-52 that will require close analysis and commitments to avoiding, minimizing and offsetting impacts. More detailed analyses may reveal impacts yet unknown, and there may be places along WWEC 30-52 where the Ten West Link alignment would need to jog to avoid certain resources and values. However, based on current knowledge, WWEC 30-52 would have significantly fewer resource impacts and conflicts than the proposed route through the Kofa NWR.	ALT	WEC

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
29	8	Helen O'Shea	Natural Resources Defense Council	CA	By considering WWEC 30-52, BLM may not only avoid impacts to the Kofa NWR by following a route with few major known conflicts, but it has the opportunity to demonstrate the promise of the WWEC system at a time when the agency is already dedicating significant resources to its WWEC reevaluation effort. We strongly recommend that BLM carefully evaluate and consider an alternative to the proposed Ten West Link within WWEC 30-52.	ALT	WEC
29	9	Helen O'Shea	Natural Resources Defense Council	CA	Given the rapid increase in renewable energy development on public lands in the West, it is important that the modernization of the electric grid and the transition to clean power does not harm landowners, cultural sites, wildlife, or wildlands in the process. Pre-screened zones and corridors for renewable energy can bring new infrastructure online quickly and accelerate the time to market for new generation by streamlining siting hurdles for project development. Landscape-level analyses attempting to locate renewable energy and transmission projects in low-impact areas are critical to this process as they help agencies prioritize projects and assess and avoid or minimize impacts more effectively.	ALT	
29	10	Helen O'Shea	Natural Resources Defense Council	CA	An open, inclusive and thorough stakeholder process should be maintained to ensure all stakeholders have their concerns and questions addressed and to allow the project to benefit from their knowledge. This process will support better coordination between stakeholder groups and decision-makers, and allow for more timely and prudent selection of low-impact transmission alternatives. Only through robust, early and frequent public engagement can the permitting agencies obtain and analyze all the relevant data for this proposed project.	NEPA	
30	1	Micah Horowitz	Arizona State Land Department	AZ	ASLD would like to offer the following alternatives A, B, and C, which are identified on the attached Exhibits A and B, for consideration during the EIS.	ALT	

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
30	2	Micah Horowitz	Arizona State Land Department	AZ	ASLD's preference is Alternative A, a route which deviates from the Proposed Route at T2N R13W Section 11 and follows the El Paso Natural Gas Pipeline northwest until it reaches the Interstate 10. This alternative would follow an existing utility corridor, and would generally reduce new impacts to State Trust land, while avoiding Central Arizona Project (CAP) canal crossings.	ALT	
30	3	Micah Horowitz	Arizona State Land Department	AZ	Alternative B would deviate from the Proposed Route near T2N R12W Section 6 and head northwest to Interstate 10. This alternative would avoid a large contiguous block of State Trust land in T3N R12W but would require two CAP crossings.	ALT	
30	4	Micah Horowitz	Arizona State Land Department	AZ	Alternative C would collocate with the CAP across State Trust land in T3N R12W & RIIW and would require two CAP crossings.	ALT	
31	1	Ian Dowdy	Sonoran Institute	AZ	The Environmental Impact Statement for 10 West Link BLM STRONGLY CONSIDER WWEC 30-52 as an alternative to, at a minimum, the portions of the line that are being considered through the Kofa National Wildlife Refuge. Evaluating transmission alternatives in designated WWEC routes may help to limit the conflicts and delays that have proved extremely challenging for other proposed transmission lines in the region. Additionally, the co-location or adjacent placement of this transmission line to the existing Interstate 10 could present opportunities to test new approaches to infrastructure development that bring added value to corridors while lowering the collective impacts of these facilities.	ALT	WEC
31	2	Ian Dowdy	Sonoran Institute	AZ	Ten West Link should be designed to serve new renewable energy resources that are planned and are likely to occur near to the corridor.	PN	

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31	3	Ian Dowdy	Sonoran Institute	AZ	The new transmission line should place at least one substation near to the Brenda Solar Energy Zone which is anticipated to host a large amount of renewable energy generation in addition to surrounding lands that are identified through the Restoration Design Energy Project as Renewable Energy Development Areas (REDAs). In the Sonoran Institute 30-52 Corridor study, we found that about 170,000 and over 370,000 acres of REDA and SEZ lands occur within 10 miles and 20 miles, respectively, of the corridor.	ALT	
32		Mike Quigley	Wilderness Society	AZ	See Alex Daue comments 32.1-32.33		
32	1	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM should not approve a route for Ten West Link through the Kofa National Wildlife Refuge (NWR) because of the sensitive and valuable wildlife habitat and other resources there.	ALT	KOF
32	2	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM should carefully evaluate and seriously consider an alternative route within West-wide Energy Corridor (WWEC) 30-52 along Interstate 10, which is part of the study area for Ten West Link, would comply avoid impacts to the Kofa, and would allow BLM to comply with its own policies regarding prioritization of siting transmission in WWEC and demonstrate the value of WWEC.	ALT	WEC
32	3	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM must update its inventory for Lands with Wilderness Characteristics as part of this NEPA process.	LU	WILD
32	4	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM must comply with existing laws and guidance on mitigation, including avoiding, minimizing and offsetting impacts, with special emphasis on avoidance of irreplaceable resources and achieving a no net loss outcome for other important resources and values.	MIT	
32	5	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM should carefully consider the long, extremely contentious, and ultimately unsuccessful history of previous attempts to site new transmission lines through the Kofa NWR and avoid repeating history.	ALT	KOF

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32	6	Alex Daue	Wilderness Society – BLM Action Center	СО	If BLM carefully evaluates and seriously considers the alternative route through WWEC 30-52, Ten West Link could be an opportunity to demonstrate the promise and value of the WWEC.	ALT	WEC
32	7	Alex Daue	Wilderness Society – BLM Action Center	СО	Routing the proposed Ten West Link line through the Kofa NWR is contrary to the mission and management standards established in the National Wildlife Refuge System Improvement Act of 1997 (Public Law 105-57).	ALT	KOF
32	8	Alex Daue	Wilderness Society – BLM Action Center	СО	A new line in essentially the same location today would substantially increase short-term and cumulative disturbances on the Refuge. We anticipate a similar finding of incompatibility for the Ten West Link proposed route through Kofa and would anticipate such a determination being upheld by higher levels of authority within USFWS and DOI	ALT	KOF
32	9	Alex Daue	Wilderness Society – BLM Action Center	СО	As noted, the previous Devers-Palo Verde 2 proposal was an exceptionally contentious issue in Arizona. The memories of that unfortunate experience are still fresh. We believe that a repeat of that divisive experience would be likely today and we advise the current project's proponents and the BLM to give serious consideration to the potentially significant time delays and cost increases that would likely accompany another attempt to site the project through the Kofa NWR.	ALT	KOF
32	10	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM is legally prohibited from authorizing any ROWs within designated wilderness areas.	GEN	WILD
32	11	Alex Daue	Wilderness Society – BLM Action Center	СО	The habitat types of the Kofa NWR are harsh, fragile, and unique in the country; consequently, Kofa continues to be an essential landscape for desert bighorn sheep and other species of interest, including desert tortoise, Gila monster, Colorado Desert Fringe-toed Lizard, Golden Eagle, LeConte's Thrasher, Gray Vireo, California leaf-nosed bat, peregrine falcon, and Kofa Mountain barberry.	WLF	KOF

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32	12	Alex Daue	Wilderness Society – BLM Action Center	СО	Wildlife populations in habitat such as the low deserts and craggy peaks of Kofa and surrounding lands are particularly susceptible to disturbance. Previous transmission line compatibility determinations in this part of Arizona have identified disturbances associated with infrastructure construction as potentially reducing reproductive success or increasing lamb mortality (through maternal abandonment) or overall population impact through habitat abandonment in desert bighorn sheep. Recent history of the Kofa desert bighorn sheep population has shown dramatic population changes: a rapid decline of approximately 50% between 2000- 2006 followed by a period of relative stabilization. Our understanding of the causal factors in this population variation is incomplete and it would be prudent to not add additional known stressors.	WLF	KOF
32	13	Alex Daue	Wilderness Society – BLM Action Center	СО	In recent years the Kofa NWR has also become greatly important to the recovery of Sonoran Pronghorn antelope.	WLF	KOF
32	14	Alex Daue	Wilderness Society – BLM Action Center	СО	Pronghorn released into the wild on Kofa NWR have been sighted in the portion of the Kofa identified as a possible route for the Ten West Link line. Further, Sonoran pronghorn require unimpeded access to varied habitats throughout the year and are extremely sensitive to human disturbance. Construction of additional infrastructure in the Kofa NWR – and the maintenance that would accompany it into the future – would increase disturbance and could have negative consequences for the continued recovery of Sonoran pronghorn.	WLF	KOF

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32	15	Alex Daue	Wilderness Society – BLM Action Center	СО	These values and changed attitudes reflect the need to evaluate any new infrastructure development within Kofa NWR from the perspective of the Refuge's current and future importance and its primary mission. That there is existing infrastructure development through Kofa NWR should not be considered as favoring additional construction and disturbance there. The pipeline, existing Devers-Palo Verde line and the previous effort for a parallel transmission line (Devers-Palo Verde 2) all pre-date the designation of Wilderness in the Kofa, pre-date the increased importance of Kofa to desert bighorn sheep, and pre-date the importance of Kofa to Sonoran pronghorn. In hindsight, the existing utility infrastructure in Kofa NWR would better have been sited elsewhere. Regardless, doubling- down now on previous oversights or errors would be the absolute wrong thing to do.	ALT	KOF
32	16	Alex Daue	Wilderness Society – BLM Action Center	СО	We have been surprised and frustrated to see BLM and major transmission project proponents in other locations in the west avoid use of WWEC and instead propose and advance new routes across undeveloped lands where impacts will be much higher and new corridors must be designated. These actions and decisions fly in the face of the purpose of the WWEC designations and seriously undermine the investments by BLM and the many stakeholders engaged in the WWEC designations. BLM has the opportunity to avoid such problems with Ten West Link by carefully evaluating and seriously considering an alternative within WWEC 30- 52.	ALT	WEC

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32	17	Alex Daue	Wilderness Society – BLM Action Center	СО	There are certainly resources and values within WWEC 30- 52 that require close analysis and commitments to avoiding, minimizing and offsetting impacts, and the detailed analysis that will be conducted for this EIS may identify impacts or conflicts that are unknown today. There may be places along WWEC 30-52 where the Ten West Link alignment would need to jog to avoid certain resources and values. However, based on current knowledge, WWEC 30-52 would be a vastly lower-impact and conflict route than the proposed action through the Kofa NWR.	ALT	WEC
32	18	Alex Daue	Wilderness Society – BLM Action Center	СО	In addition to providing an opportunity to avoid impacts to the Kofa NWR and follow a route with few major known conflicts by considering WWEC 30-52, BLM also has the opportunity to demonstrate the promise of the WWEC system at a time when the agency is dedicating serious additional resources to its WWEC re-evaluation effort, starting in the southwest but ultimately covering the entire west. We strongly recommend that BLM carefully evaluate and seriously consider an alternative within WWEC 30-52 along Interstate 10.	ALT	WEC
32	19	Alex Daue	Wilderness Society – BLM Action Center	СО	The Yuma Field Office has not updated its lands with wilderness characteristics (LWC) inventory to be compliant with current agency guidance, which was released in 2011 and 2012. BLM therefore must inventory the public lands that may be impacted by Ten West Link for wilderness characteristics, analyze potential impacts where wilderness characteristics are found, and avoid and minimize those impacts.	LU	WILD
32	20	Alex Daue	Wilderness Society – BLM Action Center	СО	Where impacts to wilderness characteristics are not avoided, they must be mitigated pursuant to departmental mitigation policy.	MIT	WILD
32	21	Alex Daue	Wilderness Society – BLM Action Center	СО	Without an updated inventory of these resources on public lands, documentation of the full extent of the project's impacts is inadequate.	LU	

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32	22	Alex Daue	Wilderness Society – BLM Action Center	СО	The Notice of Intent (NOI) to prepare an EIS for Ten West Link indicated that authorization of the proposed transmission line may require amendment of one or more Resource Management Plans (RMPs) to "change visual resource classifications and to possibly change or reclassify designated utility corridors." NOI p. 3. If an RMP amendment is required, BLM should analyze additional protective management of LWC as part of the RMP amendment.	LU	WILD
32	23	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM must analyze and document the impacts that various alternatives will have on lands with wilderness characteristics, as well as the benefits to other resources from avoiding, minimizing and/or mitigating those impacts, e.g. by selecting a route that avoids lands with wilderness characteristics. IM 2011-154 provides that BLM must "consider the benefits that may accrue to other resource values and uses as a result of protecting wilderness characteristics." As part of this analysis, BLM should recognize the wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources that the agency manages for, including scenic values; wildlife habitat, connectivity, and riparian areas; cultural resources; quality of life; and balanced use.	LU	WILD

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32	24	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM must also evaluate economic benefits of protecting lands with wilderness characteristics, consistent with agency policy. BLM has current guidance on estimating nonmarket environmental values and analyzing those values in land use planning. IM 2013-131 directs BLM to "utilize estimates of nonmarket environmental values in NEPA analysis supporting planning and other decision-making." Nonmarket values are described as values that "reflect the benefits individuals attribute to experiences of the environment, uses of natural resources, or the existence of particular ecological conditions that do not involve market transactions and therefore lack prices," such as "the perceived benefit of hiking in wilderness."	SOC	WILD
32	25	Alex Daue	Wilderness Society – BLM Action Center	СО	All inventoried LWC are a public lands resource that must analyzed in this EIS and subject to the mitigation hierarchy. Because of the important resources and values that LWC includes, as well as its sensitive nature, it is an "irreplaceable resource" and as such BLM should first and foremost seek to avoid impacting LWC with Ten West Link, consistent with the Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment (2015).	MIT	WILD
32	26	Alex Daue	Wilderness Society – BLM Action Center	СО	If BLM cannot avoid impacting LWC with Ten West Link, those impacts should be minimized to the extent possible and offset through compensatory mitigation. Additional details of our recommendations for mitigation to LWC and other resources and values are included in section IV of these comments.	MIT	WILD

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32	27	Alex Daue	Wilderness Society – BLM Action Center	СО	An October 22, 2015 California Department of Fish and Wildlife implementation memorandum also provides helpful information (Attachment 3). The MOU endorses the use of various "land use authorizations" to achieve mitigation, including "rights-of-way pursuant to 43 U.S.C. § 1761, et seq.; permits, leases or easements pursuant to 43 U.S.C. § 1731, et seq., and 43 C.F.R. § 2920; leases pursuant to the Recreation and Public Purposes Act (RPPA), 43 U.S.C. § 869, et seq.; and terms and conditions on such land use authorizations that are necessary to meet state permitting or compensatory mitigation requirements." MOU, Section C.4.b, p. 3. BLM already provides rights-of-way, easements and RPPA leases for extended terms, including issuing these instruments "in perpetuity." Consequently, using these tools allows for the mitigation actions to be of sufficient length and certainty – "durability" – to provide assurance that mitigation can be tailored to the duration of impacts and restoration for Ten West Link.	MIT	LU
32	28	Alex Daue	Wilderness Society – BLM Action Center	СО	In considering other alternatives for Ten West Link we encourage BLM to incorporate mitigation actions that will benefit conservation within the larger landscape.	MIT	
32	29	Alex Daue	Wilderness Society – BLM Action Center	СО	Saddle Mountain is an important lambing area for desert bighorn sheep and is also currently showing the stress and scars of unmanaged off-road vehicle use. The Clanton Hills and the areas surrounding Columbus, Cortez, and Dixie Peaks, Yellow Medicine Butte and Face Mountain are important linkages between protected areas. The Sonoran Desert Heritage Act sponsored by Congressman Grijalva recommends appropriate protective designations for these and nearby lands; we encourage BLM to review that proposal and consider it guidance for potential mitigation.	MIT	WILD

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32	30	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM also recently completed a Solar Regional Mitigation Strategy (SRMS) to inform mitigation to offset impacts from development in Arizona's three Solar Energy Zones. Though the impacts from Ten West Link will be different in both the development type and the location of impacts, we encourage BLM to consider whether the information in the SRMS could inform mitigation for Ten West Link.	MIT	
32	31	Alex Daue	Wilderness Society – BLM Action Center	СО	If there are unavoidable impacts to LWC from Ten West Link, we recommend that BLM establish compensatory mitigation requirements with sufficient detail to ensure that impacts are adequately mitigated, while also allowing for flexibility to address challenges that may arise with implementation of particular compensation methods. Inclusion of multiple possible compensatory mitigation methods could help provide this flexibility.	MIT	WILD
32	32	Alex Daue	Wilderness Society – BLM Action Center	СО	We also recommend that BLM ensure that methods used to calculate impacts to LWC and associated compensatory mitigation requirements address the full impacts of the transmission line development, including the direct impacts within the transmission line right-of-way (ROW) and indirect impacts outside of the ROW. In addition, for LWC units that would be eliminated because the transmission line would reduce the size of the remaining portions to below the minimum requirement of 5,000 acres,	MIT	WILD
32	33	Alex Daue	Wilderness Society – BLM Action Center	СО	BLM should require compensatory mitigation for the loss of the entire acreage of those units, not just the direct and indirect impacts of the ROW. Further, for LWC units that would be severed by Ten West Link such that portions of those units would no longer meet the size criterion for LWC, BLM should also require compensatory mitigation for the loss of the acreage of the eliminated portions of those units.	MIT	WILD

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33	1	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Transmission lines on public lands threaten wildlife, impact cultural resources and landscapes, impact visual resources, damage small communities, create health hazards for nearby residents and create a need for eminent domain on adjacent property owners.	GEN	
33	2	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The project would be operated by Valley Electric, a utility located in Pahrump, Nevada making us wonder what local benefits this project may have.	PN	
33	3	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	This would be an "Externally Generated" Purpose and Need Statement and therefore not any kind of Congressional Energy bill or presidential order (internally generated). The BLM has accepted countless externally generated Purpose and Need Statements for renewable energy projects, yet have relied on internally generated Executive Orders as justification to approve projects. Many alternatives are now defined by a Need reflecting the recent Secretarial Order 3283: Enhancing Renewable Energy Development on Public Lands. Because the Ten West Transmission Project Purpose and Need is generated "Externally". It is not fair to let these executive orders influence the outcome of a project when so many sensitive resources in the public interest would be impacted by a project.	PN	
33	3	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The BLM will traditionally portray a project like this as good for the economy, but always fails to consider how a project will have negative impacts on a small community, property values and tourism.	SOC	
33	4	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	There is nothing in FLPMA that states the need for renewable and non-renewable resources trumps the responsibility to protect natural, cultural and visual resources from unnecessary harm.	GEN	

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33	5	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	There is nothing specific in FLPMA that points out that the project site targeted for the project needs to be developed. In fact, FLPMA stresses preservation of important resources as pointed out in Section 8 in the FLPMA Declaration of Policy: "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will pro-vide for outdoor recreation and human occupancy and use"	GEN	
33	6	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The BLM news releases and scoping documents fail to really talk about what this project is actually being built for. There is a recently approved Power Purchase Agreement with Southern California Edison for the Tonopah Solar Project from First Solar, but the BLM has not been able to provide any information about which large-scale projects would hook up to the line. For this reason, the BLM should release more information about the proposed line including a list of potential projects, locations and megawatts each project would produce. At this point, it is impossible for the public to evaluate any need for this project based on its ability to deliver energy and meet energy goals.	PN	OS
33	7	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	For these reasons, we would like to request a Purpose and Need Statement that recognizes a need to protect Sonoran Pronghorn, protect raptors from transmission collision, protect cultural resources and values, protect property rights, and using the most efficient energy alternatives to a large-scale energy and controversial transmission projects.	PN	OS

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33	8	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	A No Action Alternative is the best possible solution for this project. Under the National Environmental Policy Act, BLM is required to consider a full scope of alternatives. A No Action Alternative can be justified for Ten West Transmission Project due to the amount of other known ways to produce solar energy, such as rooftop solar, which according to the NREL could meet 39 percent of the country's energy demand.	ALT	NA
33	9	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Under NEPA, BLM must consider alternatives outside of the jurisdiction of the lead agency.	ALT	
33	10	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	BLM must consider the direct and cumulative impacts of this project and how more environmentally friendly and less costly ways to generate renewable energy. Specifically, ways that do not require such extensive and destructive transmission.	ALT	
33	11	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Construction of the Ten West Line is likely to stir up fugitive dust. Dust control in hot, arid climates is very problematic. The removal of established vegetation, biological soil crusts and centuries old desert pavement creates opportunities for dust to be airborne every time the wind blows. Not only does fugitive dust create problems for visual and biological resources, it creates issues for public health as well such as valley fever.	AQ	
33	12	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	A structure this large would cumulatively impact the view from all BLM and other lands. For this reason, we would like to request that visual resources be evaluated from VRM Class I standards. This impact cannot be avoided.	VIS	CE
33	14	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	In the case of transmission, there are very few cases where BLM approved a transmission line on public land that did not result in the use of eminent domain to take private property. Not all land owners are willing sellers.	GEN	SOC

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33	15	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Valley Electric, a utility that serves Southern Nevada, will be running this transmission line from all the way in Pahrump, Nevada. As a result, ratepayers in Nevada will see a ten percent rate hike over this. But none of that power will go to the local people in Nevada. So how is it fair that people in Nevada get a rate hike for a project that serves Phoenix or Southern California? This would be an environmental justice issue for ratepayers in Nevada and should be evaluated in the Purpose and Need Statement.	SOC	OS
33	16	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	How many solar projects, wind projects or even natural gas projects would the line serve? Will more public land be needed to serve this line? About how many acres will be needed to build out the full potential of the project? Please evaluate these questions.	ALT	РА
33	17	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The BLM should estimate how many birds (raptors, passerines, etc.) would be killed or impacted by the collision or electrocution from this project over its lifespan.	WLF	
33	18	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The BLM should evaluate what wildlife migration corridors would be impacted by this project. Would the line disrupt movement of burro deer, javelina and bighorn sheep?	WLF	
33	19	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	How many desert tortoise, burrowing owls, kit fox and badgers would be relocated or hazed out of burrows?	WLF	

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33	20	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The Fish and Wildlife Service recently introduced a population of Sonoran pronghorn to the northern part of the Kofa National Wildlife Refuge. They oppose running this line through the refuge. They want the line to follow the highway. An existing line was built here in the 1980's. Expanding it will have biological and visual impacts to the refuge and the wildlife. It would be a great waste to compromise Sonoran pronghorn recover efforts for a transmission line that does not even have any legitimate big projects or power purchase agreements associated with it.	WLF	KOF
33	21	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	The BLM has a responsibility to protect all of these wildlife resources and recognize the cumulative effects of their actions. Please do not avoid this impact because it is on FWS land.	CE	WLF
33	22	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	How would construction impact pronghorn recovery efforts? Would noise and large equipment scare them off the refuge?	WLF	
33	23	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Please make a list of all rare, native plants that will be impacted by this project.	VEG	
33	24	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	How will invasive weeds be controlled? Will herbicides be used? Will glyphosate be used? If so, please make a list of all plants, including weeds that may be impacted by this. How close to local communities will this be used? Will people in these communities be warned before it is used? Will it be used in recreation areas like the Kofa Mountains Refuge?	VEG	
33	25	Kevin Emmerich and Laura Cunningham	Basin and Range Watch	NV	Please select a No Action Alternative for the Ten West Transmission Project. The project will impact too many resources for the little benefit that it will give back to the public.	ALT	NA

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34	1	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	I write this letter on behalf of my client, Local Union 769, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 769" or the "Union"), to express its profound support for the proposed project to build a transmission line from Tonopah, Arizona to Blythe, California. IBEW Local 769 fully supports the Ten West Link Project and respectfully requests that the Bureau of Land Management ("BLM") approve it.	GEN	
34	2	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	The Union recognizes the need for a transmission connection in this region that can: (i) enhance access to diverse resources; (ii) facilitate development of new renewable energy; (iii) improve regional collaboration; (iv) strengthen regional reliability; (v) conserve resources; and (vi) promote regional economic development.	GEN	
34	3	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	The Project will produce the direct economic benefit of adding new jobs. One or more electrical contractors may be interested in bidding on and providing work for the Ten West Link Project. The Union would fully support its members in obtaining these jobs, and should one or more of these contractors win the bid, the Union's members could greatly benefit from the opportunity to work on this lengthy project.	SOC	
34	4	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	The Project would diversify and stabilize the regional economy, providing secure work in a 97 mile region in Arizona and a 17 mile region in California. The influx of workers to these areas would increase spending in local economies and serve to improve the communities. Both the direct and indirect employment of workers necessitated by such a tremendous project will also decrease unemployment rates.	SOC	

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34	5	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	In addition to the employment opportunities generated by the Project, the Union believes that the Ten West Link Project will expand regional access to low-cost, environmentally- friendly energy generation sources. This will enable load servicing entities to use a more diverse, cost-effective set of energy resources to serve the electrical demand in Arizona and California. Also, the Project will create the new transmission infrastructure needed to interconnect future renewable energy resources in both Arizona and California to the bulk transmission grid. The Project will strengthen the regional transmission system by adding additional capacity and alleviate congestion. In tum, the larger, more robust transmission grid will improve energy reliability for the region's consumers. As a result of this significant investment in infrastructure, the geographical region will be more attractive to investors. Additional investment in the area is a key component to sustainable residential and commercial development and to the future employment of the Union's members, among many other things.	SOC	
34	6	IBEW Local 769 c/o Nicholas J. Enoch	Lubin & Enock, P.C.	AZ	Another benefit is the fact that the transmission line is interstate. This will facilitate efficient and increased sharing of generation resources between the two states and will enhance operational flexibility. As a result, both Arizona and California will effectively integrate renewable resources, share reliability services, and increase supply diversity under normal and emergency conditions. Finally, because the Project will use already developed transmission or utility corridors whenever possible, the visual, environmental, cultural, and other impacts will be minimized while maximizing the use of existing access roads and infrastructure.	PN	
35	1	Edward W. Sawyer		AZ	I object to the proposed alternate route through Johnson Canyon.	ALT	JC

SCOPING COMMENT LETTER ID	SCOPING COMMENT ID	NAME	AFFILIATION	STATE	SCOPING LETTER DIRECT STATEMENT ¹	CODE 1	CODE 2
35	2	Edward W. Sawyer		AZ	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC
35	3	Edward W. Sawyer		AZ	Construction of a transmission line and road would detract from the scenery and riding experience on the Arizona Peace Trail, an adventure recreation loop trail system developed by the BLM and Arizona Game & Fish.	REC	
35	4	Edward W. Sawyer		AZ	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the recreational opportunities in western Arizona.	REC	JC
35	5	Edward W. Sawyer		AZ	If construction of a transmission line through Johnson Canyon closes that portion of the Arizona Peace Trail, it would have a significant impact on the economic opportunities in western Arizona.	SOC	JC
35	6	Edward W. Sawyer		AZ	The BLM and environmentalists are concerned about OHV impacts on trails, but what about the impact of a D-9 Cat?	REC	
35	7	Edward W. Sawyer		AZ	The existing 500 kV route should be used instead.	ALT	PA
36	1	Momtaz Alam		AZ	I support the transmission line project.	GEN	
37	1	Gary M. Evanson		SD	I object to the proposed alternate route through Johnson Canyon.	ALT	JC
37	2	Gary M. Evanson		SD	Johnson Canyon is a pristine scenic canyon that has an OHV trail designated to stay open in the La Posa Travel Management Plan. It is one of the more technical routes designated in the Plan. Multiple OHV clubs use this trail and a transmission line would detract from the scenery and the riding experience.	REC	JC

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37	3	Gary M. Evanson		SD	Construction of a transmission line and road would detract from the scenery and riding experience on the Arizona Peace Trail, an adventure recreation loop trail system developed by the BLM and Arizona Game & Fish.	REC	
38	1	David and Vicki Burnworth			This area is well used by local hunting enthusiasts and just people who enjoy the natural habitat.	REC	
38	2	David and Vicki Burnworth			The location of your projected power line runs through/near an area of the Kofa Refuge that is well traveled and will destroy the natural habitat for existing animals and plants as well.	REC, WLF, VEG	KOF
38	3	David and Vicki Burnworth			It is well known that there is a corridor that runs along Highway 10 that is available for this particular project expansion. There already exists the necessary area there without disturbing yet another natural environment. Why do you feel the need to do this when you have an obvious choice available to you with much less destruction?	ALT	WEC
38	4	David and Vicki Burnworth			It seems to me that this is an example of "big money" running the show and it will do much damage to the area.	GEN	
39	1	Karly Payne	Kinder Morgan	CA	Based on the information provided, Kinder Morgan has no liquid facilities within the specified project area and therefore has no conflict with the proposed project.	LU	
39	2	Karly Payne	Kinder Morgan	CA	The project appears to be in conflict with El Paso Natural Gas lines in both Riverside County, CA and Maricopa County, AZ.	LU	
40	1	Myron L. Scott		AZ	I use the area affected by the proposed Ten West Link 500 kilovolt transmission line.	GEN	
40	2	Myron L. Scott		AZ	I oppose the Ten West Link transmission line because of the threats it poses to wildlife and habitat (floral and faunal), the rights of indigenous peoples, and strategic considerations (proximity to a major military facility).	WLF, VEG, TRIB, LU	
41	1	William Van Houten	DOD	DC	Our informal review indicates that the project's proposed route does have the potential to conflict with military training and operations.	LU	YPG

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41	2	William Van Houten	DOD	DC	In order to mitigate these potential conflicts, we request that project structures be no taller than 199' AGL and be marked with night vision compatible red lighting, emitting an infrared energy between 675 and 900 nanometers.	MIT	LU
41	3	William Van Houten	DOD	DC	In order to minimize impacts the route should not cross over Yuma Proving Ground land space in North Cibola, YPG.	ALT	YPG
42	1	Peter Potochney	DOD	DC	Our informal review indicates that the project's proposed route does have the potential to conflict with military training and operations.	LU	YPG
43	1	Dierdre West	Metropolitan Water District of Southern California	CA	The Project's proposed alignment would traverse on Metropolitan fee property in the Palo Verde Valley in Riverside County, California. The proposed route alignment is also sited on other privately owned lands, which are enrolled in the Program.	LU	
43	2	Dierdre West	Metropolitan Water District of Southern California	CA	The Project's proposed route alignment should avoid Metropolitan's fee property and other private lands currently enrolled in the Program.	PA	
43	3	Dierdre West	Metropolitan Water District of Southern California	CA	The installation of the proposed transmission will affect field operations, irrigation, aerial spraying, wind breaks, as well as current and future land uses. These effects could alter the potential for Metropolitan Water District of S. CA to lease these lands in accordance with its management objectives or realize the anticipated water savings on both the Metropolitan fee property and other private property currently enrolled in the Program.	LU	

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43	4	Dierdre West	Metropolitan Water District of Southern California	CA	 Transmission structures can cause the following agricultural impacts Create problems for turning field machinery and maintaining efficient fieldwork patterns; Increase soil erosion by requiring the removal of windbreaks that were planted along field edges or between fields; Create opportunities for weed and other pest encroachment; Compact soils and damage drain tiles; Result in safety hazards due to pole and guy wire placement; Hinder or prevent aerial spraying or seeding activities by planes or helicopters; Interfere with moving irrigation equipment; Hinder future consolidation of farm fields or subdividing land; Restrict the type of crops the tenant-farmer may cultivate, such as permanent crops successfully grown in the region (i.e., citrus and olive trees); and Restrict the Palo Verde Irrigation District's operations and maintenance of surrounding canals and drains. 	LU	
43	5	Dierdre West	Metropolitan Water District of Southern California	СА	Metropolitan Water District of S. CA requires the lands enrolled in the Program to be rotated in and out of production, so that no parcels are permanently fallowed as part of the Program. By locating power lines and associated facilities on a parcel, there is the potential that all or a portion of the parcel will become permanently non-producing, placing a greater burden on remaining lands and affecting the current land management.	LU	
43	6	Dierdre West	Metropolitan Water District of Southern California	СА	The transmission facilities would require easements, which may bifurcate land holdings and adversely affect market rents and impact property values.	SOC	

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43	7	Dierdre West	Metropolitan Water District of Southern California	CA	The specific location of the transmission lines would impair access to the property and impact future placement of utilities and roads to service Metropolitan Water District of S. CA's assets and infrastructure.	LU	
43	8	Dierdre West	Metropolitan Water District of Southern California	CA	The operation of irrigation systems such as pivot sprinklers will be severely impacted by the locations of the transmission facilities. The proposed location of the transmission line Project could thus prevent Metropolitan Water District of S. CA from promoting greater efficiency in the area and, in the process, impact water supplies for the 19 million people that Metropolitan serves.	LU	
43	9	Dierdre West	Metropolitan Water District of Southern California	CA	Metropolitan Water District of S. CA fee property and other private lands currently enrolled in the Program should be considered in planning and in the EIS, and any potential direct and indirect impacts that may occur due to implementation of the Project should be addressed and avoided.	LU	
43	10	Dierdre West	Metropolitan Water District of Southern California	CA	Development associated with the Project must not restrict any of Metropolitan Water District of S. CA fee property management objectives of revenue generation, augmentation to Metropolitan's Colorado River supply by reducing consumptive water use on the land, and maintaining local agricultural production.	SOC, WTR, LU	
43	11	Dierdre West	Metropolitan Water District of Southern California	CA	Metropolitan Water District of S. CA has been managing its lands to reduce consumptive water use, and Metropolitan is currently engaged in an effort to negotiate new leases on its properties to generate greater water savings and promote efficient and innovative technologies throughout the Palo Verde Valley. By impacting these objectives, the proposed Project may impact the ability to advance land management throughout the area, and will also impact the water supplies of southern California.	WTR	

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43	12	Dierdre West	Metropolitan Water District of Southern California	CA	In order to avoid potential conflicts with Metropolitan Water District of S. CA's facilities, Metropolitan requires that any design plans for any activity in the area of Metropolitan fee property be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan fee property should be conditioned on Metropolitan's approval of design plans for that portion of the Project. All submitted Project designs or plans must clearly identify Metropolitan fee property and other private lands currently enrolled in the Program. While impacts to these areas should be avoided by modifying the proposed Project, if the Project continues to impact these areas, these impacts must be clearly delineated.	GEN	
43	13	Dierdre West	Metropolitan Water District of Southern California	CA	The Project should not compromise water quality standards or increase the potential of degradation to water quality from chemicals entering subsurface water tables.	WTR	
43	14	Dierdre West	Metropolitan Water District of Southern California	СА	Any change to the storm water flow or drainage from the Project should not cause erosion, subsidence, or damage to Metropolitan fee property or significantly impact soil and water resources. The EIS should address potential impacts to soil and water resources, and how the Project will mitigate for any such impacts.	SOIL, WTR	
43	15	Dierdre West	Metropolitan Water District of Southern California	СА	The EIS should address potential impacts to biological resources, including burrowing owl, greater sandhill crane and their related habitats, and how the Project will mitigate for any such impacts.	WLF	
44	44.1	Randy Murray	Yuma Proving Ground, DOD	AZ	Yuma Proving Ground provided comments by memorandum dated May 4, 2016 [see Letter ID 23] as a cooperating agency under the NEPA for Ten West Link. YPG received a third revised map on May 9, 2016 prepared by HDR on April 28, 2016. The routes identified in the April 28, 2016 map identifies the routes with letters that do not correspond to the map provided during scoping and referenced in our May 4, 2016 memo.	ALT	

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44	44.2	Randy Murray	Yuma Proving Ground, DOD	AZ	To ensure our comments remain accurately tied to the proposed routes, we request Alternatives Under Review BB and AA and Alternative Route Segments Z and Y (previously Copper Bottom Alternative D, E, and G) be eliminated from consideration. The routes (as revised in Map 3) along the northeast boundary of YPG continue to impose an unacceptable risk to mission; therefore, we non-concur with any proposal that has the potential to adversely affect YPG's test mission and resources.	ALT	
44	44.3	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom A is now made up of Proposed Route Segments R, Q, P, O, and N. [see comment ID 23.2]	ALT	
44	44.4	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom B is now made up of Alternative Route Segments W and U. [see comment ID 23.3]	ALT	
44	44.5	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom C is now made up of Alternative Route Segments W and V. [see comment ID 23.4]	ALT	
44	44.6	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom D is now made up of Alternatives Under Review BB and AA. [see comment 23.5]	ALT	
44	44.7	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom E is now made up of Alternative Route Segment Z. [see comment ID 23.6]	ALT	
44	44.8	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom F is now made up of Altenrative Route Segment X (a distinct shorter segment that does not combine with Copper Bottom D). [see comment ID 23.7]	ALT	
44	44.9	Randy Murray	Yuma Proving Ground, DOD	AZ	Copper Bottom G is now made up of Alternative Route Segments Z and Y. [see comment ID 23.8]	ALT	
44	44.10	Randy Murray	Yuma Proving Ground, DOD	AZ	Alternative Route Segment S is not clearly identifyable on the map.	ALT	
44	44.11	Randy Murray	Yuma Proving Ground, DOD	AZ	Alternative Under Review T was not previously included. Route (with or without a utility corridor) does not pose an impact to our mission.	ALT	
44	44.12	Randy Murray	Yuma Proving Ground, DOD	AZ	[OTHER COMMENTS SAME AS LETTER ID 23 WITH REVISIONS TO ROUTE LETTERS]	ALT	