APPENDIX A.
Response to Comments on the Draft EIS

Appendix A. Response to Comments on the Draft EIS

2.1 Introduction

This appendix provides the Bureau of Land Management's (BLM) response to comments received on the draft environmental impact statement (EIS). This appendix contains two main sections in addition to this introduction.

- Section G.2 provides a brief introduction and an overall summary of the process of soliciting, receiving, and evaluating comments on the draft EIS.
- Section G.3 provides instructions for finding specific comment letters, facsimiles (faxes), emails and testimony (henceforth, collectively referred to as comment letters), as well as agency responses to those letters. Table A-1 contains respondent information for all comment letters received on the draft EIS. Table A-2 contains a summary of substantive comments arranged by category or resource discipline, and the agency response to each comment.

2.2 Public Comment Process

The National Environmental Policy Act of 1969 (as amended) (NEPA) requires that agencies "make diligent efforts to involve the public in ... NEPA procedures" (40 Code of Federal Regulations [CFR] § 1506.6(a)) and that the agency assess and consider comments both individually and collectively in preparing its response (40 CFR 1503.4(a)). The following subsections summarize the effort undertaken to solicit comment of the draft EIS from the public, and the methods used for processing, analyzing, and responding to those comments.

Although this appendix deals primarily with the comments received on the draft EIS, the reader should also be aware that public involvement preceded the release of the draft EIS, and included comments on the scope of issues that should be addressed in this EIS (see Chapter 5 for more information about the scoping process).

2.2.1 Public and Agency Meetings

Council on Environmental Quality (CEQ) regulations (40 CFR § 1503.1) require that federal agencies invite the public to review and comment on the draft EIS. The BLM NEPA Handbook specifies a comment period of at least 45 days. A notice of availability (NOA) was published by the U.S. Environmental Protection Agency (EPA) in the *Federal Register* (Vol. 75, No. 14) on April 9, 2010, announcing the availability of the draft EIS for public review and comment. The comment period closed May 24, 2010.

Following the release of the draft EIS, the BLM hosted three public meetings in Maricopa County, Arizona, to provide the public an opportunity to comment on the information contained in the draft EIS. The meetings were held on April 27, 2010, in Phoenix, Arizona; April 28, 2010, in Gila Bend, Arizona; and April 29, 2010, in Buckeye, Arizona. Chapter 5 of this EIS contains more information about the public meetings.

2.2.2 Comment Procedure

During the 45-day comment period, written comments were accepted through a variety of formats, including submittal at public meetings. Chapter 5 of this EIS contains a list of all methods of comment. Individuals that submitted oral comments at the public meeting were advised that in order for the

comment to be considered and included in the document, it needed to be submitted in writing. Comment forms were provided at the April 27, 28, and 29, 2010 public meetings.

2.2.3 Comment Processing

In all, 161 comment letters were received during the comment period for the draft EIS. Over 80 of these responses were email form letters; that is, comment letters containing the exact same (or very similar) verbiage, which respondents received from the Sierra Club, and had copied and pasted verbatim into an email sent to the BLM. All form letters received were from individual respondents. All comment letters received by the BLM were analyzed and included in a comment matrix.

All comment letters were numbered sequentially (beginning with 1) and labeled with a code indicating the type of entity from which it was received (i.e., individual, government agency, tribe, business, or nongovernmental organization). This combination of number and entity code resulted in a unique alphanumeric identifier (letter ID) for each individual letter or form submitted, which was then cross-referenced with the respondent contact information. Table A-1, located in Section A.3 below, contains the letter ID and respondent name and entity name (if applicable) for all nonform letter comments received.

2.2.3.1 Comment Analysis and Summary

Each unique letter and one form letter "master" was reviewed for the specific comment(s) it contained. Comments from each letter were identified and organized into resource or discipline categories. This form of analysis allows for specific comments to be captured and grouped by general topic or resource issue.

Comments on the spreadsheet are identified by letter ID for cross-referencing with the contact information table, which is included as Table A-1. Table A-2 consists of a comment matrix of all comments extracted from letters and their associated responses, organized by topic.

The full text of each comment letter received from individuals or groups are in the BLM's Lower Sonoran Field Office administrative record files, and may be viewed upon request.

2.2.3.2 Comment Response

Consistent with NEPA regulations (40 § CFR 1503.4(b)), this appendix focuses on substantive comments on the draft EIS. Substantive comments include those that challenge the information in the draft EIS as being accurate or inaccurate, or that offer specific information that may have a bearing on the decision. In response to substantive comments, BLM could

- modify alternatives including the proposed action;
- develop and evaluate alternatives not previously given serious consideration by the agency;
- supplement, improve, or modify its analyses;
- make factual corrections; and
- explain why the comments do not warrant further agency response, citing appropriate sources or authorities. (40 CFR § 1503.4(a).

Comments that merely express an opinion for or against the Proposed Action were not identified as requiring a response. In cases where the comment was substantive but appeared to indicate that information in the draft EIS was either misunderstood or unclear, a response was prepared to clarify the information.

2.3 Reader's Guide

2.3.1 Instructions for Referencing Comments

Readers wishing to find specific comments and responses will need to refer to the following tables:

- Table A-1 Draft EIS Respondent List. This list assigns a letter ID to all letter respondents, which are listed by first and last name, and/or entity name. Contact information is also provided for agencies, businesses, tribes, and nongovernmental organizations; contact information for individuals has been redacted.
- Table A-2, Draft EIS Comments and Responses. Each entry in this table is a distinct comment extracted from a letter and contains the letter ID (column A); the comment number within the letter (column (B); the resource discipline or category to which the comment was coded (column C); the actual comment (column D); and its response (column E).

The reader may find all comments and responses associated with each respondent contained in Table A-2 by matching the letter ID number with the respondent name/entity listed within Table A-1. Responses referring readers to information contained in another comment/response entry cite the referenced comment's letter ID (column A) and comment number (column B). For example, a response guiding the reader to see the response to 030-G-3 is referring the reader to the third comment from respondent 30-G.

Table A.1 Draft EIS Respondent List

Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
1-G	Jerry Bradley	Prescott National Forest	344 South Cortez Street	Prescott	AZ	86303	MS (1)
2-G	Scott Lowe	Town of Buckeye	530 East Monroe Avenue	Buckeye	AZ	85326	ALT (1); WAT (1)
3-G	Diane Arnst	Arizona Dept of Environmental Quality	1110 West Washington Street	Phoenix	AZ	85007	AQ (4)
4-I	James Orloff		Personal contact information redacted				AQ (1); MS (2); SOC (2); TRA (2); WAT (3)
5-I	Thomas Doggett		Personal contact information redacted				WAT (3)
6-I	Thomas Doggett		Personal contact information redacted				MS (1)
7-I	Thomas Doggett		Personal contact information redacted				WAT (2)
8-I	Thomas Doggett		Personal contact information redacted				HAZ (1); SOC (1); WAT (2)
9-G	David Biddle	Arizona Dept of Environmental Quality	1110 West Washington Street, 3rd Floor	Phoenix	AZ	85007	AQ (1)
10-G	David Biddle	Arizona Dept of Environmental Quality	1110 West Washington Street, 3rd Floor	Phoenix	AZ	85007	AQ (3)
11-G	Joe Schmitz	City of Goodyear	195 North 145th Avenue, Building	Goodyear	AZ	85338	WAT (4)
12-T	Leigh J. Kuwanwisiwma	Hope Tribe	P.O. Box 123	Kykosmovi	AZ	886039	ALT (1); CUL (1); MS (2)
13-I	Kris Gorsuch		Personal contact information redacted				NA
14-B	Gretchen Honan	CH2M -Hill, Water Business Group	2020 Southwest 4th Avenue 3rd Floor	Portland	OR	97201	MS (2)
15-O	Emily Boehm	The Wildlife Society	5410 Grosvenor Lane	Bethesda	MD	20814	MS (1)

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
16-G	Carol Sachs	Environmental Protection Agency	75 Hawthorne Street	San Francisco	CA	94105	MS (1)
17-O	Janine Blaeloch	Western Lands Project	P.O. Box 95545	Seattle	WA	98145	MS (1)
18-B	Turner	PrescottShedandGarage.com	No address given				MS (1)
19-I	Rita Smalling		Personal contact information redacted				MS (1)
20-B	Mary Smith	Tierra Right-of-Way Services	101 North 1st Avenue, Suite 2075	Phoenix	AZ	85003	MS (1)
21-I	Jim and Elaine Stack		Personal contact information redacted				MS (1)
22-B	Nichole Hughes	Element Power Americas	421 Southwest Sixth Avenue, Suite 1000	Portland	OR	97204	MS (1)
23-I	Nancy Santori		Personal contact information redacted				MS (1)
24	No database entry using this number						NA
25-I	Scott Canada		Personal contact information redacted				MS (1)
26-I	Jean-Luc Michel		Personal contact information redacted				MS (1)
27-I	Heather Goebel		Personal contact information redacted				MS (1)
28-I	Alan Zonker		Personal contact information redacted				MS (1)
29-B	none given	Transparency Market	No address given				MS (1)
30-I	Thomas Doggett		Personal contact information redacted				WAT (2)
31-I	Drena LaPointe-Meyer		Personal contact information redacted				NA
32-I	Kris Steinke		Personal contact information redacted				NA
33-I	Linda Dills		Personal contact information redacted				NA
34-I	Bill Gardner		Personal contact information redacted				NA
35-I	Kurt Mattocks		Personal contact information redacted				NA

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
36-I	Ruth Bescript		Personal contact information redacted				NA
37-I	Elizabeth Cook		Personal contact information redacted				NA
38-I	Mike Llewellyn		Personal contact information redacted				MS (1); TAC (1)
39-I	Valerie Ryan		Personal contact information redacted				NA
40-I	Patricia Morrison		Personal contact information redacted				NA
41-I	Patricia Orlinski		Personal contact information redacted				MS (2)
42-I	Chris Hall		Personal contact information redacted				NA
43-I	Robert MacNish		Personal contact information redacted				NA
44-I	Caleb Laieski		Personal contact information redacted				NA
45-I	Nancy Wall		Personal contact information redacted				NA
46-I	Judy Goosherst		Personal contact information redacted				NA
47-I	Annette Pedersen		Personal contact information redacted				NA
48-I	Lisa Pinczewski-Sweet		Personal contact information redacted				NA
49-I	Avi Henn		Personal contact information redacted				NA
50-I	Carla Morin		Personal contact information redacted				NA
51-I	Mary Best		Personal contact information redacted				NA
52-I	Skip Radau		Personal contact information redacted				NA
53-I	Nancy Schuhrke		Personal contact information redacted				NA
54-I	Howard Israel		Personal contact information redacted				NA
55-I	Jeanne Saint-Smour		Personal contact information redacted				NA
56-I	Nancy Matthews		Personal contact information redacted				NA
57-I	Crispino Ramos		Personal contact information redacted				NA
58-I	KC Cooper		Personal contact information redacted				NA
59-I	Donald Yeager		Personal contact information redacted				NA

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
60-I	Angela Froehlich		Personal contact information redacted				NA
61-I	Jerryl Gordon		Personal contact information redacted				MS (1)
62-I	Kathy / Michael Shores		Personal contact information redacted				NA
63-I	Roger Deming		Personal contact information redacted				MS (1)
64-I	Roger Deming		Personal contact information redacted				NA
65-I	Roger Deming		Personal contact information redacted				MS (1)
66-I	Donna Cassano		Personal contact information redacted				NA
67-I	Rob Lowe		Personal contact information redacted				NA
68-I	Amy McMullen		Personal contact information redacted				NA
69-I	Jack Tuber		Personal contact information redacted				NA
70-I	Wendy Schwartz		Personal contact information redacted				NA
71-I	Douglas Price		Personal contact information redacted				NA
72-I	Carmen Nichols		Personal contact information redacted				NA
73-I	Sheila (no last name given)		Personal contact information redacted				NA
74-I	Melissa Donovan		Personal contact information redacted				ALT (2); SOC (1); WL (1)
75-I	Maryelizabeth Hart		Personal contact information redacted				NA
76-I	Teresa Altiery		Personal contact information redacted				NA
77-I	Eileen Kane		Personal contact information redacted				ALT (1); MS (1); SD (1); WAT (1); WL (1)
78-I	Angela Fazzari		Personal contact information redacted				NA
79-I	Angela Fazzari		Personal contact information redacted				NA
80-I	John Mihalka		Personal contact information redacted				MS (2)
81-I	Cindy Wines		Personal contact information redacted				VEG (1); WL (1)
82-I	Brian Nordstrom		Personal contact information redacted				NA
83-I	Heather Kutch		Personal contact information redacted				NA

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
84-I	Derek Knowlton		Personal contact information redacted				WAT (2)
85-I	Bob Segal		Personal contact information redacted				NA
86-I	Barbara Martin		Personal contact information redacted				MS (1)
87-I	Roger Williams		Personal contact information redacted				NA
88-I	Kathryn Buttles		Personal contact information redacted				NA
89-I	Elizabeth Enright		Personal contact information redacted				NA
90-I	Taylor Markey		Personal contact information redacted				NA
91-I	Annie McMahon		Personal contact information redacted				NA
92-I	Bruce Hermes		Personal contact information redacted				MS (1)
93-I	Leon DeKing		Personal contact information redacted				NA
94-I	Leon DeKing		Personal contact information redacted				NA
95-I	Elizabeth Ridgely		Personal contact information redacted				NA
96-I	Carolyn Moore		Personal contact information redacted				NA
97-I	Tazeem Starbrant		Personal contact information redacted				NA
98-I	Selina Starbrant		Personal contact information redacted				NA
99-I	Kenneth Molinkiewicz		Personal contact information redacted				NA
100-I	Linda Bescript		Personal contact information redacted				NA
101-I	Paul Frizane		Personal contact information redacted				NA
102-I	Kathleen Medina		Personal contact information redacted				NA
103-I	Frank Wyse		Personal contact information redacted				NA
104-I	Linda Boothe		Personal contact information redacted				NA
105-I	Bickel Bettina		Personal contact information redacted				NA
106-I	Bassett Anne		Personal contact information redacted				SOC (1)
107-I	William Thornton		Personal contact information redacted				NA
108-I	Sidney Hirsh		Personal contact information redacted				NA

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
109-I	Jennifer Valdez		Personal contact information redacted				NA
110-I	Ray Villanueva		Personal contact information redacted				NA
111-B	Mark Peters	O.R. Colan Associates	15333 North Pima Road, Suite 215	Scottsdale	AZ	85260	MS (1)
112-I	Caleb Laieski		Personal contact information redacted				NA
113-I	Frank Graffagnino		Personal contact information redacted				NA
114-I	Lynne Edwards		Personal contact information redacted				NA
115-I	Ray Riley		Personal contact information redacted				NA
116-I	Tom Timmer		Personal contact information redacted				MS (1)
117-I	Philip Church		Personal contact information redacted				NA
118-I	Rox Fowlie		Personal contact information redacted				NA
119-I	Kathleen Templeton		Personal contact information redacted				NA
120-G	Tom Kelly	U.S. Environmental Protection Agency Region IX, Environmental Review Office (CED-2)	75 Hawthorne Street	San Francisco	CA	94105	VEG (1)
121-I	Tina Pursell		Personal contact information redacted				NA
122-I	William and Sue Luse		Personal contact information redacted				MS (1); SD (1)
123-I	Karen Christian		Personal contact information redacted				MS (1)
124-I	Thomas Doggett		Personal contact information redacted				HAZ (1); NOI (1); TRA (1); VIS (1); WAT (1)
125-I	Mark W. Turley		Personal contact information redacted				SOC (1)
126-I	no name given		Personal contact information redacted				WAT (1)
127-I	Sarah Doggett		Personal contact information redacted				SOC (1); TRA (1); WAT (1)
128-I	no name given		Personal contact information redacted				ALT (1); VIS (1)
129-G	John Fischbach	City of Goodyear	190 North Litchfield Rd	Goodyear	AZ	85338	ALT (1); MS (2); NOI (1); TAC (1); TRA (2); WAT (6)

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
130-I	Chris Askew		Personal contact information redacted				MS (1); SOC (1)
131-G	Scott Lowe	Town of Buckeye	530 East Monroe Avenue	Buckeye	AZ	85326	MS (1)
132-I	Benjamin Munoz		Personal contact information redacted				MS (1); WAT (1)
133-I	F. Musa		Personal contact information redacted				VIS (4)
134-I	Thomas Doggett		Personal contact information redacted				HAZ (1); MS (2); REC (1); SOC (2); TRA (1); WAT (3)
135-G	Dana Warnecke	Arizona Game and Fish Department	7200 East University Avenue	Mesa	AZ	85207	CUM (1); MIT (1); RLM (1); WL (2)
136-G	John Kyl	US Senate		Washington	DC	20510	MS (1); WAT (5)
137-T	Peter L. Steere	Tohono O'odham Nation	P.O. Box 837	Sells	AZ	85634	ALT (1); CUL (2); MS (1); SD (1); VEG (1); WAT (5)
138-G	Tom Kelly	EPA	75 Hawthorne Street	San Francisco	CA	94105	PRO (1)
139-G	Stephen S. Cleveland	Town of Buckeye	530 East Monroe Avenue	Buckeye	AZ	85326	ALT (2); AQ (3); HAZ (2); RLM (1); SOC (1); TRA (3); WAT (3)
140-G	Pamela A. Mathis	BLM Phoenix District	21605 North 7th Avenue	Phoenix	AZ	85027	ALT (2); MS (1); VIS (10)
141-G	Laura Grignano / Sandra Fabritz-Whitney	Arizona Department of Water Resources	3550 North Central Avenue,.2nd Floor	Phoenix	AZ	85012	PRO (2)
142-I	Stephen Saway		Personal contact information redacted				LU (1); MS (1); VIS (2)
143-B	Sunandra Behara	Next Era	700 Universe Boulevard	Juno Beach	FL	33408	ALT (2); AQ (36); CC (2); GEO (2); HAZ (1); LSG (11); LU (43); MIT (3); MS (8); NOI (50); PAL (2); REC (38); SD (36); SOC (8); TRA (2); VEG (7); VIS (15); WAT (19); WL (27)

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
144-G	Tim Strow	Maricopa Association of Governments	302 North 1st Avenue, Suite 300	Phoenix	AZ	85003	CUM (1); MS (1); PRO (1); TRA (1)
145-G	Stephanie Huang	Arizona Department of Transportation	1611 West Jackson	Phoenix	AZ	85007	ALT (1); HHS (1); MS (3); SOC (2); TRA (16); VIS (1)
146-I	no name given		Personal contact information redacted				WAT (1)
147-I	Virginia Stordock		Personal contact information redacted				MS (1)
148-G	Kathleen M. Goforth and Tom Kelly	U.S. EPA, Region IX	75 Hawthorne Street	San Francisco	CA	94105	ALT (8); MS (6); PRO (2); SOC (1); WAT (19); WL (2)
149-G	Linda C. Tuant and David Lelsz	Arizona Dept of Environmental Quality					PRO (4)
150-O	Alex Daue	Wilderness Society, Sierra Club-Grand Canyon Chapter, Friends of the Sonoran Desert Museum, Sonoran Institute, Tonopah Area Coalition, and Defenders of Wildlife	1660 Wynkoop Street, Suite 850	Denver	CO	80202	ALT (22); CC (5); CUL (2); LU (6); MIT (28); MS (6); NOI (3); PN (2); PRO (7); RLM (1); SD (1); SOI (1); TAC (2); VEG (1); VIS (2); WAT (6); WL (9)
151-I	Roxie Schliesman		Personal contact information redacted				NA
152-I	Mary Weeks		Personal contact information redacted				NA
153-I	Jeff Hopkins		Personal contact information redacted				NA
154-I	Susan Flynn		Personal contact information redacted				NA
155-I	Gergory Nerode		Personal contact information redacted				NA
156-I	Dustin Fuller		Personal contact information redacted				NA
157-I	Brenden Hughes		Personal contact information redacted				MS (3)
158-I	Margaret Davies		Personal contact information redacted				NA
159-I	Janette Weaver		Personal contact information redacted				NA
160-I	Thomas Wagner		Personal contact information redacted				MS (1)
161-G	RJ Cardin	Maricopa County Parks & Recreation Dept.	234 North Central Avenue, Suite 6400	Phoenix	AZ	85004	ALT (5); CC (1); CUM (2); MS (1); NOI (1); PRO (2); REC (5); VEG (1); VIS (1); WAT (2)

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Letter ID	Name	Entity	Street Address	City	State	Zip	Resource Category [1] Comments (number of comments)
162-I	Jon Schumacher		Personal contact information redacted				ALT (10); CUL (2); HAZ (1); PRO (3); SD (12); SOI (2); VIS (2); WL (2)

[1]**RESOURCE CODE ABBREVIATIONS**	Miscellaneous	MS= VEG=Vegetation
ALT=Alternatives	MIT= Mitigation	TAC =Terms and Conditions
AQ= Air Quality	NOI= Noise	TRA= Transportation
CC= Climate Change	PAL= Paleontology	VIS=Visual Resources
CUL= Cultural Resources	PN= Purpose and Need	WAT= Water Resources
CUM = Cumulative Impacts	PRO= Process	WL=Wildlife Resources
GEO=Geology	REC= Recreation	
HAZ= Hazardous Materials	RLM= Reclamation	NA= Not applicable (no substantive comment)
HHS=Health and Human Safety	SD =Special Designations	
LU= Land Use	SOC= Socioeconomics	
LSG=Livestock Grazing	SOI=Soils	

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
18	145-G	ALT-3	Consider Other Technology	How about investigating the potential for methane (natural gas) re-use?	Thank you for your comment. Methane (natural gas) re-use as a method for generating electricity was not considered in the EIS because it is out of the scope of the BLM's decision concerning approval of a right-of-way for a solar-generating facility.
1	128-I	ALT-1	Consider Alternative Locations	Needs more of a setback on east side of project (adjacent to landowners) because of visual impacts.	Thank you for your comment. Please note that Alternative B: Reduced Footprint was developed to respond to issues, including visual impacts to residential developments, as descr bed in Section 2.7.1 of the draft EIS. Visual impacts to residential developments to the east of the Project Area were addressed in Sections 4.17.3.2, 4.17.4, and 4.17.5 of the draft EIS.
32	148-G	ALT-1	Consider Alternative Locations	EPA is pleased that the DEIS provided discussion of other locations on BLM land that were eliminated from further discussion; however, we question whether the discussion of the availability of groundwater at those locations is appropriate, given the reduced water needs from dry cooling.	Groundwater availability was one of several criteria used to determine the relative suitability of each potential location. Because the Proposed Action and the range of alternatives considered include water supply requirements of up to approximately 3,000 acre-feet per year, an assessment of groundwater supply was a useful screening criterion to ensure alternative feasibility. The rationale for eliminating alternative locations on BLM and private lands has been expanded in the final EIS in Section 2.11.6.
32	148-G	ALT-1	Consider Alternative Locations	The criteria for evaluating private sites also raise many concerns. Once a screening criterion, such as 15 miles to the Jojoba Switchyard, is set, which locations on BLM land such as Aguila do not meet, the private options become quickly limited. We recommend that BLM reconsider the screening criteria to determine their appropriateness. Recommendation: The basis for each screening criterion should be explained in the FEIS.	The explanation of how and why each screening criterion was used by Boulevard has been expanded in the final EIS in Section 2.11.6. In Section 2.9.6 of the draft EIS the BLM provided rationale for eliminating alternative locations on BLM and private lands. This explanation has been expanded in the final EIS in Section 2.11.6.
85	150-O	ALT-1	Consider Alternative Locations	From Attachment A, scoping letter: Consideration of alternative sites and configurations is critical to ensuring the Sonoran Solar Energy project site chosen is the best possible location for the project. This consideration should be based on solar resource, proximity to existing transmission and infrastructure, and conflicts with other resources and values on the project site….The BLM must thoroughly consider and present the public with a true range of alternative sites in the DEIS…. Without thorough consideration of multiple alternative sites and configurations, BLM will have reduced the EIS to a "foreordained formality" and improperly limited the alternatives under consideration…. We strongly encourage the BLM to engage in a broader landscape level assessment of solar development in the desert.	Additional project locations and configurations were considered in the development of alternatives to the Proposed Action. The consideration of alternative sites is described in the draft EIS in Section 2.9.6 Alternate Locations. Additionally, the SSEP EIS is a site-specific assessment, not a landscape-level assessment. A programmatic EIS, led by the BLM and the Department of Energy, is being developed to address the broader landscape-level planning for solar development in the desert.
3	162-I	ALT-1	Consider Other Location	The project proponent and BLM appear to have arbitrarily eliminated analyzing other locations for this project because of the proposed project area's proximity to a specific electrical substation and its associated transmission lines, access to a natural gas line, and the perceived access to subsidized land and water from the Federal government, which are solely economic criteria.	Boulevard used several criteria to eliminate areas from further consideration for their purposes in pursuing ROWs for solar development. Among these criteria were proximity to existing infrastructure such as a transmission line a substation, a natural gas pipeline, an adequate water supply, and highways and access roads. The explanation of how and why each screening criterion was used by Boulevard has been expanded in the final EIS in Section 2.11.6. While these are economic criteria in the sense that proximity to existing infrastructure would reduce fixed costs they are also environmental criteria since shorter transmission lines and pipelines result in fewer acres of disturbance. Also by locating near existing infrastructure development is concentrated in areas with pre-existing disturbance. In Section 2.9.6 of the draft EIS the BLM provided rationale for eliminating alternative locations on BLM and private lands. This explanation has been expanded in the final EIS in Section 2.11.6.
5	162-I	ALT-1	Consider Other location	While the DEIS claims the project proponent used a screening criteria of "Wilderness, wilderness study areas, areas of critical environmental concern, parks, and military installations," it is unclear why the extremely close proximity of SDNM and the North Maricopa Mountains Wilderness area and another wilderness study area within SDNM were not used to exclude the current proposed project site and compel the examination of other alternative, less environmentally sensitive locations.	The explanation of how and why each screening criterion was used by Boulevard has been expanded in the final EIS in Section 2.11.6. The BLM does not consider the proximity of the SSEP Project Area to wilderness, wilderness study areas, ACECs parks or military installations to be reason by itself to not further consider the area for solar development because the BLM does not generally apply "no development" buffers to these areas.
6	162-I	ALT-1	Consider Other location	The current DEIS is basically a document that says build it here at this single location, or build it slightly smaller here at this single location, or don't build it at all. This is not how the NEPA process is supposed to work, and this is not a reasonable panel of feas ble alternatives.	Section 2.2 of the draft EIS descr bes the method by which alternatives were initially identified to meet the purpose and need. To ensure a wide consideration of the poss ble range of alternatives, six primary categories of alternatives were identified for further consideration.
8	162-I	ALT-1	Consider Other location	Again, in this case, the range of alternatives was arbitrarily narrowed, apparently to benefit the project proponent financially, much to the detriment of SDNM. It is inconceivable that the only place this industrial facility could be built in the entire state of Arizona is next to a National Monument, a Wilderness Area, and another area proposed for wilderness. The criteria and explanations the proponent use for eliminating building on private lands are vague, nebulous, and it appears as though they didn't try very hard to make it work at any other site.	The explanation of how and why each screening criterion was used by Boulevard has been expanded in the final EIS in Section 2.11.6. Section 2.11.6.2 of the final EIS has been updated to include additional BLM rationale for eliminating alternative private land locations from detailed analysis in the EIS analysis.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
9	162-I	ALT-1	Consider Other location	The alternative of examining other possible locations for this facility is both reasonable and feas ble as witnessed by the plethora of proposed projects across the Southwestern United States, including Arizona. For example, just a few miles south of the current project area, another solar project is planned for already-disturbed farmland in an area which would not impact any National Monuments directly or indirectly.	The explanation for why other locations on BLM and private lands were eliminated from detailed analysis has been expanded in the final EIS in Section 2.11.6.
11	162-I	ALT-1	Consider Other location	Unlike other energy sources, solar generation is not tied to a specific location, unlike say oil or gas. It is not like a mine, which is tied to the specific location of a particular mineral occurrence. Instead, the sun is available across the planet (Germany of all places is reportedly a world leader in solar production and is a country not particularly known for a hot, sunny climate).	Thank you for your comment.
12	162-I	ALT-1	Consider Other location	While the American Southwest is a particularly sunny spot, there is nothing that says this specific proposed project area, next to a National Monument of importance to all Americans, has any monopoly on access to sunlight any more than an alternative location say fifty miles away. Industrial facilities like this solar project can basically be built anywhere, and there are many out there already.	Thank you for your comment.
30	162-I	ALT-1	Consider Other location	In summary, the current DEIS is inadequate. The BLM must fulfill its responsibility to protect and buffer SDNM from incompatible uses near its boundary (such as this project) and look at all reasonable alternatives to this proposed project location, not simply a location preferred by the project proponent.	The explanation for why other locations on BLM and private lands were eliminated from detailed analysis has been expanded in the final EIS in Section 2.11.6. Further, the BLM does not consider the proximity of the SSEP Project Area to wilderness, wilderness study areas, ACECs, parks, or military installations to be reason, by itself, to not further consider the area for solar development because the BLM does not generally apply "no development" buffers to these areas.
34	162-I	ALT-1	Consider Other location	If the project proponent insists on the current proposed location then BLM has only one alternative, which is to deny issuance of the requested ROW permit/grant to the project proponent.	Thank you for your comment.
11	129-G	ALT-10	Relocate Power blocks	To insure noise impacts are minimized, the proponent should consider locating the power blocks as far from residential land as reasonably possible. Shifting the 125MW power block ~ mile to the west should be considered to ensure that noise is mitigated by distance as much as reasonably possible.	Alternative B: Reduced Footprint was designed to address potential impacts to residences, and locates the power blocks as far from residential land as possible while still meeting project needs.
4	140-G	ALT-10	Relocate Power blocks	For visual reasons, it is proposed that the power blocks, especially, are situated more north than the plan drawings indicate. Instead of situating the power generation in the middle of each field, push both blocks back, extending as far away from the Monument/Wilderness as possible, which decreases the visual impact and places the structure more in line or even with the background vegetation and mountain range [viewed as critical visual mitigation factor].	This suggested mitigation is not feas ble because the power blocks need to be centrally located within the fields to gain thermal efficiency and minimize pumping energy losses.
3	140-G	ALT-11	Limit structure heights	Limit the height of structures so that the power blocks, cooling systems, storage tanks, and towers are NOT higher than the background vegetation [viewed as critical visual mitigation factor.]	To be economically viable, the SSEP is designed to use primarily standard power block equipment commonly available from a variety of vendors. Therefore, the suggested mitigation could not be feasibly implemented given the standard sizes of some equipment in excess of the height of Project Area vegetation. The visual simulations of these impacts from key observation points have been included in the final EIS in Appendix H.
1	139-G	ALT-12	Consider changing Alternatives to Proposed Action	The Town of Buckeye is concerned about the high water demands of the wet-cooled technology. The water demands of Alternative A, a dry-cooled technology, are only about 5% of the water demands of a dry-cooled technology. For this reason the Town of Buckeye requests implementation of Alternative A, a dry-cooled technology.	Thank you for your comment.
5	139-G	ALT-12	Consider changing Alternatives to Proposed Action	Therefore, if the SSEP withdraws large volumes of groundwater, it will be using low-cost groundwater that Goodyear, Buckeye, or other Arizona water users may need in the future. This may force the SSEP's neighbors to purchase future water supplies at a much higher cost. For this reason, the Town of Buckeye recommends that Alternative A, a dry-cooled technology, be implemented.	Thank you for your comment.
38	150-O	ALT-12	Consider changing Alternatives to Proposed Action	If dry cooling or hybrid cooling is determined to be technically and economically feas ble, BLM should select the least water-intensive cooling method as the agency's Preferred Alternative.	Thank you for your comment.
39	150-O	ALT-12	Consider changing Alternatives to Proposed Action	If BLM chooses wet cooling as the Preferred Alternative, the agency should strongly consider use of the brine concentrator to limit some of the water demands of SSEP.	Thank you for your comment.
2	2-G	ALT-3	Consider Other Technology	In my comments on the draft I offered what an adjacent solar utility project is proposing. I believe that the EIS should address what the plans are for the City of Phoenix utility grade solar power plant. This latest article in the Phoenix Business Journal, http://phoenix.bizjournals.com/phoenix/stories/2010/04/12/daily64.html#ixzz0lYYUrbjk, makes the dismissive statement in the draft EIS about CPV engine systems seem as if the technology is not suited for this area.	The article provided references to the manufacture of solar engine components rather than a utility-scale project of similar size to the SSEP. As explained in the draft EIS in Section 2.9.5 Alternative Solar Technologies, the technologies to be manufactured in the plant cited in the article are not sufficiently commercially proven at the utility scale to be considered a feas ble alternative for this project. This is not a statement on the feasibility of these technologies for use in other projects.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
31	148-G	ALT-3	Consider Other Technology	L ke photovoltaic technology, there are few, if any, parabolic trough solar thermal facilities operating in the U.S. at the scale proposed by the SSEP. The FEIS should consider alternative solar energy generating technologies that may reduce the resource impacts of the project.	In the draft EIS several alternative solar technologies were considered but not carried forward for detailed analysis due to their generally unproven nature at a commercial utility scale (see Section 2.9.5). In the final EIS photovoltaic technology is considered in detail as a sub-alternative to the reduced water use alternative (see Section 2.7).
33	150-O	ALT-3	Consider Other Technology	Similarly, the DEIS appears to dismiss hybrid cooling out of hand by assuming that a hybrid cooling system would involve essentially a full-sized dry system and a full-size wet system (p. 2-46). This result seems counter-intuitive, and deserves more explanation.	A more detailed explanation of the reasons that a hybrid cooling system would involve essentially a full-sized dry system and a full-sized wet system has been incorporated into Section 2.11.2 of the final EIS.
34	150-O	ALT-3	Consider Other Technology	Also in need of further explanation is the statement later on that page that "A hybrid-cooled plant designed in an optimal fashion begins to mimic the costs of a dry-cooled plant." There are a number of hybrid and dry cooled power plants in operation today that illustrate the technical and economic feasibility of low water use cooling in some situations. A study by the California Energy Commission's Public Interest Energy Research (CA PIER) program detailed years of data from five dry or hybrid cooled power plants (four combined cycle natural gas plants and one wood waste fired plant) and found limited difficulties with operations and maintenance of the dry and hybrid cooled systems.	In Section 2.11.2 the final EIS has been revised to clarify why hybrid-cooled plants begin to mimic dry-cooled plants. Please note that a fully dry-cooled alternative (Alternative A: Reduced Water Use) was retained for detailed analysis in the draft EIS.
25	143-B	ALT-4	Proposed Action Operational Details/Questions	pg 2-16 Section 2.5.2.2.5 Table 2.2: The "Capacity" column entries for MMBtu input capacity must be clarified either in the column title or in a footnote to indicate that this represents the burner equipment specification, not the actual thermal input or fuel design capacity for gas-co-fired operation. The fuel input level is limited to a rate less than the burner specification due to other process factors (Refer to Table 4.2, for example).	This section has been clarified in the final EIS as suggested.
41	150-O	ALT-4	Proposed Action Operational Details/Questions	Though the DEIS states that "The ultimate construction and use of thermal energy storage (TES) would depend on the direct preference of customers (i.e., those entities purchasing the power from the SSEP), which could change over the life of the SSEP" (p. 2-5), BLM can and should recommend to the customers that TES be implemented.	Thank you for your comment.
42	150-O	ALT-4	Proposed Action Operational Details/Questions	BLM should maintain flexibility for the construction of TES in the FEIS, and the agency should recommend to the customers of SSEP that it be implemented.	Thank you for your comment.
45	150-O	ALT-4	Proposed Action Operational Details/Questions	Though the use of Heat Transfer Fluid (HTF) is discussed at length in the DEIS, the actual contents and composition of the HTF does not appear to be detailed anywhere. BLM should provide this information to the public in the FEIS.	Additional information on the contents and composition of the HTF has been added to Section 2.5.2.2.2 of the final EIS.
27	143-B	ALT-5	General Clarification between Alternative Operations	pg 2-63 Table 2.14 Table is more or less a summary of results and a comparison of results rather than a summary of specific impacts. The public needs to know the impact of the results. It is unclear how this information is useful other than a summary of key parameters for each alternative. It might also be helpful if the mitigation and residual impacts were added so the public could see the impacts after mitigation is applied.	Table 2.14 in the draft EIS presents a comparison of the impacts that would result from implementation of each alternative. A summary of key parameters is provided in the draft EIS in Table 2.13 Comparison of Alternatives. In the draft EIS potential mitigation measures were addressed at the end of each resource section in Chapter 4 in the sections, Additional Mitigation Measures. The residual impacts after application of these potential mitigation measures are disclosed in the Residual Impacts section that follows the Additional Mitigation Measures section. The residual impacts analysis assumes the application of all proposed mitigation which is not part of the Proposed Action and Alternatives. For clarity, "Additional Mitigation Measures" has been changed to "Potential Mitigation Measures" in the final EIS.
25	148-G	ALT-5	General Clarification between Alternative Operations	The FEIS should discuss the benefits of the Brine Concentrator, including the reduced size of evaporation ponds and the reduced impact to birds and bats.	The impacts resulting from the application of a brine concentrator are discussed where applicable for each resource in Chapter 4 of the draft EIS. In addition, the reduced size of evaporative ponds is mentioned in the draft EIS in Section 2.8 Reduced Water Use Option: Brine Concentrator, and in the draft EIS in Table 2.13 Comparison Of Alternatives. In working with AZGFD (a cooperating agency), it was determined that there was no evidence that a reduction in the size of evaporative ponds would result in a reduction in the potential for impacts to birds and bats. BLM has deferred to AZGFD's expertise in regard to this analysis.
6	150-O	ALT-5	General Clarification between Alternative Operations	Analysis of hybrid and dry cooling in the DEIS is inadequate, and BLM should provide further analysis of the impacts of these cooling options to the levelized cost of electricity, the annualized electrical production, and the capital cost of SSEP.	As described in Section 2.9.2 of the draft EIS, Hybrid cooling would not provide environmental benefits relative to a dry-cooled system (considered in detail under Alternative A) and has not been carried forward for detailed analysis. Dry cooling was retained for detailed analysis in the draft EIS. Additional information related to the cost of hybrid cooling has been added to Section 2.11.2.3 of the final EIS.
9	150-O	ALT-5	General Clarification between Alternative Operations	Given the many resources that would be impacted by SSEP [reference to list of impacts discussed on pages 4-174-184 of the DEIS] , BLM should select an alternative that minimizes those impacts as well as requires robust mitigation measures and defines how the efficacy of those mitigation measures will be evaluated.	Thank you for your comment.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
32	150-O	ALT-5	General Clarification between Alternative Operations	Though the DEIS does nominally analyze both wet and dry cooling, as well as a brine concentrator option, the analysis does not appear to be very deep. In particular, there does not appear to have been any optimization of the size of the solar field relative to the size of the power block for a dry-cooling option, something that could potentially limit the increase in the LCE associated with dry cooling.	Further discussion of how Alternative A was optimized has been incorporated into Section 2.6 of the final EIS. Further optimization may take place, subject to the terms and conditions of any BLM approval, should that alternative be selected in the record of decision (ROD).
35	150-O	ALT-5	General Clarification between Alternative Operations	Overall, additional analysis of the potential impacts of dry and hybrid cooling to the capital costs, annual output, and LCE from SSEP will be necessary to determine which option makes the most sense from environmental, economic and technical perspectives.	As described in Section 2.9.2 of the draft EIS, hybrid cooling would not provide environmental benefits relative to a dry-cooled system (considered in detail under Alternative A) and has not been carried forward for detailed analysis. Dry cooling was retained for detailed analysis in the draft EIS. Additional information related to the cost of hybrid cooling has been added to Section 2.11.2.3 of the final EIS.
36	150-O	ALT-5	General Clarification between Alternative Operations	Furthermore, BLM should consider how the use of wet cooling in an arid region could impact public support for this project and future projects.	Thank you for your comment.
37	150-O	ALT-5	General Clarification between Alternative Operations	BLM should provide further analysis of the potential impacts of dry and hybrid cooling to the LCE, the annualized electrical production, and the capital cost of from SSEP.	As described in Section 2.9.2 of the draft EIS, hybrid cooling would not provide environmental benefits relative to a dry-cooled system (considered in detail under Alternative A) and has not been carried forward for detailed analysis. Dry cooling was retained for detailed analysis in the draft EIS. Additional information related to the cost of hybrid cooling has been added to Section 2.11.2.3 of the final EIS.
40	150-O	ALT-5	General Clarification between Alternative Operations	Furthermore, the BLM should consider the negative impact that wet cooling could have on public support for this project, as well as potential negative impacts to future projects due to public concern about water use for cooling.	Thank you for your comment.
67	150-O	ALT-5	General Clarification between Alternative Operations	From Attachment A, scoping letter: More broadly, however, our concerns lead us to ask that a less water-intensive system that does not add significantly to the cost of generating electricity is considered and analyzed in the DEIS. The BLM should analyze alternatives in the Draft EIS that use hybrid or dry cooled systems to determine whether these options may be technically and economically viable and could minimize potential impacts to water resources and other related environmental impacts.	A dry-cooled alternative was fully analyzed in the draft EIS (Alternative A: Reduced Water Use). A hybrid cooling system was considered but dropped from detailed analysis in the draft EIS (please see Section 2.9.2 of the draft EIS). In the final EIS photovoltaic technology is considered in detail as a sub-alternative to the reduced water use alternative.
19	161-G	ALT-5	General Clarification between Alternative Operations	2.5.2.11.2 Lighting System: Lights that don't attract nocturnal insects should be used to prevent a "sink" effect that would result in the unnecessary death of native creatures that are near the bottom of the food chain for local wildlife or that pollinate native plants.	As discussed in Section 4.17.3.4 of the draft EIS, lighting for the SSEP under the Proposed Action would be designed to provide the minimum illumination needed to achieve safety and security objectives.
21	161-G	ALT-5	General Clarification between Alternative Operations	4.3.4.1 Emissions from Construction, Vegetation Loss, and SSEP Operations mentions the following: "Once the Project Area vegetation has been cleared, it would be sent to area landfills where its decay would result in methane GHG emissions that would not otherwise occur." We question why such a huge volume of natural material should be sent to a landfill, shortening its lifespan and hastening the need for a new landfill site. We also suggest that the vegetation be sent to a composting facility so it can eventually be reused.	The draft EIS used a conservative approach to estimate total metric tons of carbon dioxide equivalents that would be generated as a result of project activities, including site grading. Section 4.3.10 of the final EIS has been updated to include a mitigation measure to reduce landfilling of site vegetation.
2	FORM LETTER	ALT-6	Combine Alt A and Alt B	I encourage you to look at an alternative that both reduces the footprint of the project and utilizes dry cooling, so that the water use for the project is minimal. In our arid state, it is essential that we seek to conserve our precious groundwater.	The draft EIS analyzed in detail a range of action alternatives consisting of the Proposed Action, a full footprint alternative utilizing dry-cooling, and a reduced footprint alternative utilizing wet-cooling. A water use reducing technology (brine concentrator) was also analyzed in detail as an option applicable to the Proposed Action and the reduced footprint alternatives. A reduced footprint and dry-cooled alternative is therefore within the range of alternatives analyzed in detail in the draft EIS. Based on the analysis it is within the BLM's decision space to combine both a reduced footprint and dry-cooling in the ROD, and a separate reduced footprint dry-cooled alternative need not be analyzed as a standalone alternative. Further, in the final EIS photovoltaic technology is considered in detail as a sub-alternative to the reduced water use alternative. This alternative involves a reduced footprint as well as reduced water use. (Please see Section 2.7 of the final EIS for a detailed explanation of the photovoltaic alternative).
3	12-T	ALT-6	Combine Alt A and Alt B	We recommend combining the advantages of each [Alternative A, dry cooling and Alternative B, reduced footprint] if poss ble.	Same response for Comment #2, directly above (FORM LETTER-2).
26	148-G	ALT-6	Combine Alt A and Alt B	The FEIS should descr be any potential benefits from using the Brine Concentrator as an option combined with Alternative A.	The draft EIS analyzed in detail a range of action alternatives consisting of the Proposed Action, a full footprint alternative utilizing dry-cooling, and a reduced footprint alternative utilizing wet-cooling. A water use reducing technology (brine concentrator) was also analyzed in detail as an option applicable to the Proposed Action and the reduced footprint alternatives. A reduced footprint and dry-cooled alternative is therefore within the range of alternatives analyzed in detail in the draft EIS. Based on the analysis it is within the BLM's decision space to combine both a reduced footprint and dry-cooling in the ROD, and a separate reduced footprint dry-cooled alternative need not be analyzed as a standalone alternative. Further, in the final EIS photovoltaic technology is considered in detail as a sub-alternative to the reduced water use alternative. This alternative involves a reduced footprint as well as reduced water use. (Please see Section 2.7 of the final EIS for a detailed explanation of the photovoltaic alternative).

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	**FORM LETTER**	ALT-7	Limit Natural Gas Usage	Finally, this project should be a truly renewable project and not be using natural gas up to 25 percent of the time. If it was on private land, then that would be a choice the applicant could make, but considering it is on public lands and utilizing public resources, I encourage you to seek to ensure that the public benefits are maximized, including the greenhouse gas benefits. I ask that you evaluate utilizing additional storage for the facility and limiting the use of natural gas further.	It would not be feas ble to eliminate natural gas usage under the Proposed Action or other action alternatives considered in detail in the draft EIS. Natural gas co-firing is necessary to prevent the heat transfer fluid from freezing. Also, although eliminating the use of natural gas would reduce greenhouse gas emissions as a result of this project, this would also limit the power purchaser's flex bility in meeting electrical demands in the service area. A more detailed explanation of considerations with respect to natural gas usage has been added to Section 2.5.2.2.5 of the final EIS. Finally, an alternative that uses photovoltaic technology (descr bed in Section 2.7 of the final EIS) has been analyzed in detail as Sub-alternative A1. This alternative does not use or require natural gas.
3	74-I	ALT-7	Limit Natural Gas Usage	I hope that this plant quickly becomes solar-powered itself and requires no dirty fuels to operate it.	Thank you for your comment.
4	77-I	ALT-7	Limit Natural Gas Usage	I am concerned that... use of natural gas be eliminated from the project.	Thank you for your comment.
79	150-O	ALT-7	Limit Natural Gas Usage	From Attachment A, scoping letter: expanded to replace the thermal input provided by gas. Moreover, the levelized cost of providing storage rather than natural gas support may not be significant. (We also understand that gas provides a level of certainty that may allow NextEra to ask for a higher price for its power.) However, the Sonoran Solar Energy Project's proposed configuration raises the larger question of why a renewable energy project would limit its usefulness in generating carbon-free electricity by generating any significant greenhouse gas emissions. The BLM and NextEra should consider storage as an alternative means of meeting peak-related energy demands. It is clearly economically feasible as this is the configuration being developed for the proposed Solana facility in Gila Bend as well as for Starwood I in the Harquahala Valley.	Both thermal energy storage (TES) and gas backup have been included as potential means of providing dispatchable power under the action alternatives. As described in Section 2.5.1 of the draft EIS, the purpose of the TES would be to increase daily hours of operation, shift energy production into peak periods, and make up production during periods of extended cloud cover. The ultimate construction and use of TES would depend on the direct preference of customers (i.e., those entities purchasing the power from the SSEP), which could change over the life of the SSEP.
82	150-O	ALT-7	Limit natural Gas Usage	from Attach A, scoping letter: NextEra must provide the energy profile (capacity factor and time of energy output) that is desired from the plant so the public will have a better understanding of the project's proposed use of gas. The BLM and NextEra should consider storage as an alternative means of meeting peak-related energy demands.	Given that natural gas co-firing for energy production is at the offtakers option to meet peak load demand it is not possible to pinpoint the degree of natural gas co-firing that would occur following project implementation. However, 25% of energy production is the maximum energy output any offtaker would be able to produce using natural gas co-firing. More discussion concerning the range of possible natural gas co-firing up to 25% has been added to Section 2.5.2.2.5 of the final EIS. Further, Section 4.3 of the draft EIS includes a comprehensive summary of GHG emissions associated with the project. This includes carbon dioxide emissions associated with the natural gas component. In the final EIS Section 4.3 has been updated to show the range of CO_2 emissions possible for the project. Plant start-up and freeze protection uses dictate the minimum amount of natural gas required to operate the SSEP.
3	FORM LETTER	ALT-8	Reduce footprint and/or proximity to SDNM/wilderness	Considering the proximity of the project to the Sonoran Desert National Monument, I also would l ke to see the footprint reduced and to the greatest degree possible kept closer to the disturbed areas nearby and away from the monument and wilderness.	A reduced footprint alternative was analyzed in the draft EIS as Alternative B, Reduced Footprint. This alternative was developed in part to address potential impacts to the Sonoran Desert National Monument. Given the constraints of existing land uses surrounding the Project Area, as well as other resource concerns, it was not possible to locate the Project Area under Alternative B further from the Sonoran Desert National Monument. A consideration of photovoltaic technology has been added as a sub-alternative in the final EIS. This sub-alternative also has a reduced footprint as compared to the Proposed Action, but given the constraints of existing land uses surrounding the Project Area, as well as other resource concerns, it was not possible to locate the Project Area under Sub-alternative A1 further from the Sonoran Desert National Monument. Additional explanation concerning the rationale for eliminating alternative configurations from detailed analysis has been added to the final EIS in Section 2.11.9.
4	137-T	ALT-8	Reduce footprint and/or proximity to SDNM/wilderness	It is inappropriate to site this 3,700 acre facility next to two wilderness areas and a National Monument. It should be relocated.	Thank you for your comment.
5	FORM LETTER	ALT-9	Locate on previously disturbed land	I also encourage the BLM to continue to seek to site these renewable energy projects on disturbed lands to the greatest degree possible.	Thank you for your comment.
2	74-I	ALT-9	Locate on previously disturbed land	I... sincerely hope this is land that has been previously degraded from some other purpose like agriculture and it is not an untouched area of land.	Thank you for your comment.
8	150-O	ALT-9	Locate on previously disturbed land	While we of course prefer that whenever poss ble projects are sited on disturbed areas such as some agricultural or mined lands, this site does not have significant conflicts… NextEra should generally be commended for their efforts to identify a good site.	Thank you for your comment.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
49	150-O	ALT-9	Locate on previously disturbed land	From Attachment A, scoping letter: Renewable resource development is not appropriate everywhere on the public lands, however, and development that does occur on the public lands must take place in a responsible manner. We think it is most appropriate to seek disturbed sites or sites where the facility will not result in a net increase in water use.	The consideration of other locations, including private and disturbed "brownfields" locations, is described in Section 2.9.6 of the draft EIS. The draft EIS also includes consideration of Alternative A: Reduced Water Use. The final EIS has been revised to consider photovoltaic technology as a sub-alternative to the reduced water use alternative.
97	150-O	ALT-9	Locate on previously disturbed land	From Attachment A, scoping letter, Attachment A—Criteria for use in identifying appropriate areas for development: In general, we support siting of generation facilities on private and state trust lands over public lands. Private lands are preferable in that they include disturbed lands, are typically located near transmission facilities and other infrastructure, and may retain existing water rights. These may include retired agricultural lands, entitled lands, and mining lands. With respect to public lands, U.S. Bureau of Land Management lands in particular, it is most appropriate to consider areas that have been previously disturbed, leaving untrammeled desert areas in their natural state to the greatest extent poss ble.	The consideration of other locations, including private and disturbed "brownfields" locations, is described in the draft EIS in Section 2.9.6.
3	161-G	ALT-9	Locate on previously disturbed land	We fully support such project being built on private land, especially degraded agricultural land, as well as old mine sites on public land, landfills and other such areas with little ecological or scenic values.	The rationale for eliminating alternative locations on BLM and private lands has been expanded in the final EIS in Section 2.11.6.
11	161-G	ALT-9	Locate on previously disturbed land	This project would take away a huge area of such space. We are all for solutions to global warming and US energy independence, but we believe such land-intensive facilities should be located on underused or unused private farmland, of which there is plenty in Arizona. According to 2.9.6.2 Alternative Private Land Locations, only three areas of private land were explored. It is likely there are many feas ble areas that can be assembled for future projects without the pressure of a deadline. Building the plant on old, unused, level farm fields would likely require less grading for construction as well as for reclamation afterwards, resulting in greater net energy production.	The rationale for eliminating alternative locations on BLM and private lands has been expanded in the final EIS in Section 2.11.6. Per BLM IM 2011-059 "The BLM will not typically analyze a nonfederal land alternative for a right-of-way application on public lands because such an alternative does not respond to the BLM's purpose and need to consider an application for the authorized use of public lands for renewable energy development."
18	161-G	ALT-9	Locate on previously disturbed land	While this may be beyond the scope of the EIS, and while we prefer to see such projects take place on previously disturbed land, we believe that if undisturbed land is used, an equal amount of similar or better habitat on an area at least equal to the disturbed area should be acquired from the State or private owners and permanently protected from development.	Thank you for your comment.
33	162-I	ALT-9	Locate on previously disturbed land	Other locations that are on previously disturbed and/or damaged landscapes (such as retired farmlands) and preferably on private land would be acceptable for the current project as long as any alternative project location is at a reasonable distance from sensitive areas such as National Monuments.	The rationale for eliminating alternative locations on BLM and private lands has been expanded in the final EIS in Section 2.11.6. Per BLM IM 2011-059 "The BLM will not typically analyze a nonfederal land alternative for a right-of-way application on public lands because such an alternative does not respond to the BLM's purpose and need to consider an application for the authorized use of public lands for renewable energy development."
1	3-G	AQ-1	General Comment	The project area is not located in a nonattainment area for 10-micron pollutants (PM_{10}) and ozone. The project is likely to have a less than de minimus impact on air pollution; nevertheless, considering prevailing winds near the metropolitan Phx Serious PM_{10} Nonattainment Area, the side of the project, and to comply with other applicable air pollution control requirements and minimize adverse impacts on public health and welfare, the following information [and mitigation measures] are provided	Thank you for your comment.
3	4-I	AQ-1	General Comment	The project states that currently air quality has .08 particulates and construction will increase the particulates to 4.3 which are equal to the City of Phoenix.	Thank you for your comment.
1	9-G	AQ-1	General Comment	Confirming our telecon today, referencing our letter dated April 23, 2010, and our File Number 236070 on the Sonoran Energy Project. We were in error. The project area described is in a nonattainment area for 10-micron pollutants (PM_{10}) and ozone. We apologize for any inconvenience. The documents sent and comments made would apply since it is a PM_{10} nonattainment area.	Thank you for the correction to your comment letter.
1	10-G	AQ-1	General Comment	The proposed project area is located in a nonattainment area for 10-micron pollutants (PM_{10}) and ozone. The project is likely to have a less than de minimus impact on air pollution, but our recommendation remains the same.	Thank you for your comment and recommendations. At the time of publication of the draft EIS the question of whether the SSEP represented a major source or a minor source was not definitive. Since publication of the draft EIS the proponent has committed to limiting emissions during construction and operations to less than the major source threshold for PM_{10}. This commitment has been added to the list of applicant-committed environmental protection measures in Table 2.2 As a result, Section 4.2.1 the referenced paragraph has been re-written in the final EIS to clearly state that the SSEP would be a minor source
28	143-B	AQ-1	General Comment	pg 3-3 Section 3.2.2 The last sentence makes it sound as if Woolsey Peak has two elevations. Suggest rewording such as 2,460 ft at (some reference point) to 3,170 ft at Woolsey Peak.	Thank you for your comment. In the final EIS Section 3.2.2 the sentence has been reworded to read: "Elevations in the area range from just over 1,000 feet above mean sea level (amsl) along the valley floor to a peak elevation of 3,170 feet at Woolsey Peak approximately 18 miles west of the Project Area."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
29	143-B	AQ-1	General Comment	pg 3-4 Section 3.2.2 Fourth paragraph of section: the characterization "The hot and dry conditions in the region contribute to windblown dust and frequent dust storms." It would be more accurate to state instead that although pronounced dust storms can occur, they are localized, of short (very few hours) duration, and limited to approximately a 2 month period, per year.	Thank you for your comment. In the final EIS the paragraph in Section 3.2.2 has been updated to remove reference to frequent dust storms. In addition, temperature inversions are identified as an additional contributing factor to PM_{10} exceedances. More detail on factors affecting PM_{10} has been added to Section 3.2.4.1.1 based on information obtained from the *PM-10 Source Attribution and Deposition Study* released by the Maricopa Association of Governments [MAG] in 2008.
30	143-B	AQ-1	General Comment	pg 3-11 Section 3.2.4.1.1 Table 3.5: Specify the time scale, or the averaging time of the "Maximum Wind Speed" Sky Harbor and Goodyear wind speed data. For any meaningful analysis, it makes a difference if these winds are instantaneous, 5-minute, 1-hour, or longer period averages.	Thank you for your comment. The averaging time of the wind speed data presented in Table 3.6 of the draft EIS is hourly. The final EIS has been updated to clarify the averaging period.
31	143-B	AQ-1	General Comment	pg 3-11 Section 3.2.4.1.1 Table 3.5 and discussion in the last paragraph of the section: It is numerically true that "most" of the days tabulated in Table 3.5 with PM_{10} concentration higher than the NAAQS occurred when undefined "wind events" greater than 20 mph occurred; 18 instances of concentrations above the NAAQS correspond to "events" above 20 mph, compared to 11 instances with "events" below 20 mph. This simple "majority rules" argument is not convincing from any statistical viewpoint. More importantly, there is no apparent scientific or statistical rationale provided here that supports a correlation between wind speed data (the basis for which is not clearly defined in Table 3.5) and local PM_{10} 24-hour concentrations. First, simply plotting the data in Table 3.5 yields no correlation between the wind speeds and coincident PM_{10} concentrations – the result is a random scatter. Second, for this data to support the asserted conclusion, it must be considered in context of the many other days with "wind events" above 20 mph during which no NAAQS exeedances occurred. If the causative factors were so simple, then MAG and MCAQD would have an easier time making progress toward NAAQS attainment. This line of reasoning intentionally misleads the public regarding the cause and effect relationship of Maricopa County PM_{10} pollution issues. It may have the unintended effect of trivializing these agency's efforts, and make them seem somehow "misguided." This entire analysis is oversimplified, misuses data in an attempt to support an erroneous and pre-determined "cause and effect" conclusion, and is scientifically unfounded. Table 3.5 and any related analysis comparing wind speeds to local PM_{10} concentrations should be completely stricken from the EIS.	The referenced analysis relating specific exceedance events to high wind conditions has been modified to compare hourly maximum wind concentrations to thresholds identified as triggers in windblown dust in MAG 2008 (6 mph and 14 mph) at select monitoring points in the nonattainment area (MAG 2008). Additional discussion on other causative factors, such as inversions, has also been expanded.
32	143-B	AQ-1	General Comment	pg 3-11 Section 3.2.4.1.1 Last sentence of section: Strike this entire sentence. There is no rational or scientific basis (at least, none is given) to assert that an exceedance of the 24-hour PM_{10} NAAQS that coincidentally occurs on July 4 is "partly associated with emissions from fireworks."	July 4th is a significant national holiday in the United States on which the use of fireworks is widespread. For this reason it is reasonable to conclude that 24-hour PM_{10} NAAQS exceedances on this day are at least partly associated with emissions from fireworks. However, the statement has been qualified with the phrase 'likely to be' in the final EIS.
33	143-B	AQ-1	General Comment	pg 3-15 Section 3.3.4 Section 3.3.4 as written and Table 3.9 are misplaced in the Climate Change section. These materials should be relocated to Existing Conditions for Air Quality elsewhere in Chapter 3, without climate change association. This presentation may mislead the public to believe the "third tier" of analysis for Climate Change mentioned in section 3.3.1 could be attempted starting from the data in this section and Table 3.9. GHG emissions from a given source or locale cannot be related to climate effects within the same region with current tools or climate understanding.	Thank you for your comment. The material in the referenced section and the referenced table has been removed from Section 3.3.4. Table 3.9 has been added to Section 3.2.2 of the final EIS and is referred to as Table 3.2. The language in Section 3.3.4 was already included in Section 3.2 in the draft EIS.
87	143-B	AQ-1	General Comment	pg 4-15 Section 4.2.2.1.1 First paragraph. The number of months and other construction schedule information in this paragraph, and elsewhere, may by updated by SSEP prior to issuance of the Final EIS.	Thank you for your comment. The analysis and discussion in Section 4.2.2.1.1 of the final EIS has been updated to reflect the final proposed construction schedule.
88	143-B	AQ-1	General Comment	pg 4-16 Section 4.2.2.1.1 End of fifth paragraph of section. The characterization supposedly from Maricopa Co. Rule 310.01 that "all open-area disturbed surfaces be restored within 60 days such that the soil characteristics are similar to….undisturbed native conditions and that stabilization would be achieved within 8 months" improperly paraphrases the rule, and leaves out the intent that surface restoration is but one stabilization option in cases where such restoration is feas ble. This gives the misleading impression there is a mandatory requirement in county rules to achieve a post-construction soil condition that is not feas ble or economically reasonable. Reword the sentence indicating that restoration to native conditions is only one of several options allowed under MCAQD Rule 310.01.	Thank you for your comment. Section 4.2.2.1.1 of the final EIS has been revised to include all stabilization options available under MCAQD Rule 310.01.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
91	143-B	AQ-1	General Comment	pg 4-21 Section 4.2.2.3 Fourth paragraph of section: The sentence beginning "The extremely stable atmosphere and low wind conditions typical of cooler months may also cause . . ." must be omitted. The topic of visible steam plumes is NOT addressed by VISCREEN, so it is not appropriate to have this brief and unsupported statement here. The topic of visible steam plumes is addressed elsewhere, in Section 4.2.4.3.	Thank you for your comment. In the final EIS the sentence has been removed from Sections 4.2.2.3 and 4.2.4.3.
92	143-B	AQ-1	General Comment	pg 4-24 Section 4.2.4.1.2 Third paragraph: The sentence beginning "Operating limits on fuel input proposed by the facility would result in emission levels below the 100 tpy major source thresholds . . ." must be revised to have a separate clause for PM_{10}, because the major source threshold for PM_{10} is 70 tpy for Maricopa County as a non-attainment area, not 100 tpy.	Thank you for your comment. In the final EIS Section 4.2.4.1.2 has been rewritten to accurately reflect all major source thresholds.
93	143-B	AQ-1	General Comment	pg 4-24 Section 4.2.4.2 First paragraph, last sentence: Change the word "concentration" to "overall county emission rates" since the referenced data in Table 4.6 is for emissions, not local concentrations, and the two cannot be directly related absent a modeling exercise.	Thank you for your comment. In the final EIS the sentence has been reworded to reference Table 4.6 and emissions rather than local concentrations.
94	143-B	AQ-1	General Comment	pg 4-24 Section 4.2.4.2 Second paragraph: The sentence beginning "Similarly, the SSEP would contribute at most an additional 0.562 $\mu g/m^3$ of PM_{10} during a 24-hour period and therefore would contribute to the existing exceedances" must be reworded. Identical instances of this text appear in parallel in the sections on the Proposed Action, Alt A and Alt B. The text first presents the maximum emission scenario predicted operational phase off-site concentrations of PM_{10} and $PM_{2.5}$ in $\mu g/m^3$ from the Technical Report but then goes on to compare these values to the >150 $\mu g/m^3$ magnitude values occasionally observed at Buckeye and subjectively concludes that the potential maximum contribution of 0.3% to 150 $\mu g/m^3$ represented by the SSEP must be additive to the Buckeye concentrations and therefore; "would also increase the frequency of these exceedances." There is no technical basis for this gross oversimplification, especially absent a modeling exercise. It would be more appropriate and objective to state; "Since the maximum concentration from Project sources is only 0.3 percent of the 24-hour PM_{10} standard, and because this level is predicted to occur close to the Project site boundary, the SSEP would not have a significant impact on NAAQS exceedances measured in developed areas of the county." The existing DEIS characterization will mislead the public, and will erroneously lead to the inference that any new, even minor-source emissions anywhere within the geographic limits of a non-attainment area automatically cause or contributes to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defens ble on regulatory grounds.	Thank you for your comment. The suggested text changes have been incorporated into the final EIS with some modifications. The text now reads "SSEP sources constitute a maximum of 0.37% of the 24-hour PM_{10} standard (see Table 4.6) and are predicted to occur close to the Project Area boundary."
96	143-B	AQ-1	General Comment	pg 4-26 Section 4.2.4.3 First paragraph, first sentence. Replace the text "single hour when the unfavorable meteorological" with "worstcase hour for which it was assumed the most unfavorable meteorological". This more-accurately characterizes the VISCREEN method for the screening approach.	Thank you for your comment. The referenced text has been revised in Section 4.2.4.3 of the final EIS to read "The VISCREEN model was used to evaluate the maximum potential impact over a single hour. The analysis conservativelyassumed the most unfavorable meteorological conditions and that a low sun angle occurred simultaneously for each observer location."
97	143-B	AQ-1	General Comment	pg 4-26 Section 4.2.4.3 Second paragraph, sentence beginning: "Under the most adverse dispersion conditions, plumes would be perceptible at . . ." To convey the correct basis for this portion of the VISCREEN analysis, this sentence should be reworded: "Under the most adverse meteorological conditions, including night time hours, the model predicted that a plume could be visible at . . ." Also, add at the end of this paragraph: "To better evaluate the likelihood of significant plume visibility during daylight conditions, the VISCREEN model was operated with a data filter to predict the number of daylight hours per year, on average, when observers might see visible plumes.	Thank you for your comment. The final EIS has been updated to reflect the suggested changes.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
98	143-B	AQ-1	General Comment	pg 4-30 Section 4.2.5.2 First paragraph: The sentence beginning "Under Alternative A, the SSEP would contribute at most an additional 0.28 µg/m^3 of PM_{10} during a 24-hour period" must be reworded. This is the same comment expressed for Section 4.2.4.2, above. The text compares the project impacts to the >150 µg/m^3 magnitude values occasionally observed at Buckeye, and subjectively concludes that the potential maximum contribution of 0.19% to 150 µg/m^3 represented by the SSEP must be additive to the Buckeye concentrations and therefore; "would also increase the frequency of these exceedances." There is no technical basis for this gross oversimplification absent a modeling exercise. See prior comment for rewording recommendation. The existing characterization will mislead the public, and will erroneously lead to the inference that any new, even minor source emissions anywhere within the geographic limits of a non-attainment area automatically causes or contributes to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defensible.	Thank you for your comment. The text has been modified to reflect that the project is unl kely to contr bute to NAAQS exceedances. The text now reads "SSEP sources would constitute a maximum of 0.2% of the 24-hour PM_{10} standard (Table 4.10), and wouldoccur close to the SSEP site boundary."
105	143-B	AQ-1	General Comment	pg 4-36 Section 4.2.8 Second paragraph: This entire paragraph is based on the premise that because the Project is in the PM_{10} non-attainment area, and NAAQS exceedances may occur during some high wind events, then "mitigation of all PM_{10} and $PM_{2.5}$ is required during high wind events." (emphasis added). This sounds like an attempt to impose an ad hoc policy rather than connect feasible mitigation options to the demonstrated l kelihood for significant impacts. Refer to the comment for Section 3.2.4.1.1 regarding the fallacy of relating non-attainment concentration measurements to short-term wind conditions. As discussed in that comment, the reliance on a correlation between "wind events" and NAAQS exceedences is not supportable on any scientific grounds. There are many more days with similar elevated winds when a PM_{10} exceedance does not occur. Another point: it is not justified to include $PM_{2.5}$ when the issue at hand is potential windblown PM_{10} mitigation. It is recognized that the source of $PM_{2.5}$ is almost entirely fuel combustion sources, not windblown geologic dust. Reference to $PM_{2.5}$ should be removed from any discussion of mitigation for fugitive dust from geologic sources.	Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions." In addition, because the emissions inventory indicates that the project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS.
108	143-B	AQ-1	General Comment	pg 4-36 4 Section 4.2.8 Second paragraph, third bullet. The statement "Treating all disturbed areas on the Project Area immediately, as discrete phases of construction on each area are completed" (emphasis added) is too stringent and vague. This language appears to be pandering to a perceived need to impose severe measures. It would be more realistic to mirror language from agency regulations in this vein, using a terminology such as "as soon as practicable", rather than "immediately."	This portion of Section 4.2.10 of the final EIS has been revised. The statement in question now reads: "Treat all disturbed areas on the Project Area as soon as practicable (as discrete phases of construction on each area are completed), with a dust palliative to reduce windblown dust emissions."
110	143-B	AQ-1	General Comment	pg 4-36 Section 4.2.8 Second paragraph, fifth bullet. Later in this bullet text it is properly stated that the maximum annual construction emissions could not be estimated with current information. However, in the next sentence these annual emissions are erroneously estimated as 12 times the peak month emissions, or 12 x 8.8 tons/month. Presenting this calculation as a reasonable estimate is misleading to the public and ignores the proper representation of widely varying distribution of construction activities from month to month. In an approximate sense, construction activity and emission rates may be represented by a "bell curve" over the time of the construction period. The area under such a curve (which here would reflect cumulative emissions) is about half the area of a rectangle drawn to enclose the entire curve at the peak month. So it is not unrealistic to propose that the DEIS representation over-estimates cumulative construction emissions by a factor of two, and must be omitted.	Thank you for your comment and recommendations. At the time of publication of the draft EIS the question of whether the SSEP represented a major source or a minor source was not definitive. Since publication of the draft EIS the proponent has committed to limiting emissions during construction and operations to less than the major source threshold for PM_{10}. In the final EIS this commitment has been added to the list of applicant-committed environmental protection measures in Table 2.2 and the statement in the referenced bullet has been deleted.
112	143-B	AQ-1	General Comment	pg 4-36 Section 4.2.8 Third paragraph and bullet. Even if the lack of justification is put aside, the timeframe and amount of any potential "offsets during wind events" cannot be specified. The timeframe for a high wind event in the Salt River Valley airshed is not "all day", so the timing of offsets is indeterminate. The discussion fails to address how this idea could even be implemented. There is no certain method to quantify the emissions reduction achieved from a given offset. Across what timeframe are the offsets credited? Before, during or after the unpredictable "wind event"? These considerations expose the off-site mitigation option as ill-conceived and not reasonable, and it should be omitted from the DEIS.	Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions." In addition, because the emissions inventory indicates that the project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
114	143-B	AQ-1	General Comment	pg 4-37 Section 4.2.10 Second paragraph. Each of the assertions of impacts in this paragraph does not indicate whether those potential impacts rise to the level of significance. This is a key objective of a NEPA-driven impacts analysis. It is first noted that "Operation of the SSEP would result in long-term emissions of criteria pollutants and an associated increase in concentration of these pollutants surrounding the Project Area for the 30-year lifespan of the Project . . ." It should also be stated that these increases are predicted to be a fraction of a percent of the NAAQS, which is the applicable significance criteria. L kewise, this paragraph states "Operation would also lead to visible plumes from (should read "which may be seen from") several recreational and wilderness areas within 50 km. . ." Factually correct, but this omits the critical mention that even worst case meteorological assumptions cause such plumes to be vis ble less than 1% of daylight hours, and only at the three closest observer locations. To meet the intent of a NEPA analysis, each of these statements must be put into proper context with respect to the Significance (or lack thereof) of each potential impact, as shown in Table 4.8.	Thank you for your comment. In the final EIS the referenced statements in Section 4.2.12 have been revised to provide more context to the impacts discussed.
6	143-B	AQ-2	Facility emissions	Another concern with the air quality assessment is the attempt to apply major source regulatory criteria to the Project emissions which are at minor source levels. The prime example is the recommendation that emission offsets be required for some or all Project emissions. This type of requirement is normally applicable to major sources being constructed in non-attainment areas. This is not the case for the Sonoran Solar Energy Project.	Under the National Environmental Policy Act the BLM may consider all feasible mitigation to reduce or eliminate environmental impacts. However, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS. Further, Section 4.2.10 of the final EIS has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, in the final EIS the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions."
89	143-B	AQ-2	Facility Emissions	pg 4-20 Section 4.2.2.2 Second paragraph of section. The wording of the sentence beginning "The cooling towers were not included in the screening model because they are not considered point sources . . ." must be revised to reflect the entire rationale: "The cooling towers were not included in the screening model because they do not have point source characteristics compatible with the large, hot exhaust, stack sources, and thus cannot be treated in the same SCREEN3 model. For this reason, the towers were addressed quantitatively in the plume visibility analysis."	Thank you for your comment. Section 4.2.2.2 of the final EIS has been updated to reflect the suggested changes.
90	143-B	AQ-2	Facility Emissions	pg 4-21 Section 4.2.2.3 Second paragraph of section: The sentence beginning "These factors are wind directions from the source(s) to the applicable observation point, frequency of strong winds capable of conveying the source plume . . ." must be restored to more closely reflect the language in the Technical Report to convey the concept correctly."These factors allow the model to account for occurrences when the wind is blowing in the necessary direction to convey the source plume(s) to a viewer in a given sensitive area, and to consider intervening topographic features." The "frequency of strong winds" is not a factor, and in fact, strong winds tend to disperse a plume so that it is not conveyed to a viewer.	Thank you for your comment. Section 4.2.2.3 of the final EIS has been updated to reflect the suggested changes.
100	143-B	AQ-2	Facility Emissions	pg 4-32 Section 4.2.6.1.1 Second paragraph. The scaling of construction-related emissions for the smaller footprint of two 125 MW plants (Alternative B) is reasonable here for the gaseous pollutants, but not the particulate species (PM_{10} and $PM_{2.5}$). The construction phase disturbance area is the factor that most determines the construction particulate emission rate over the maximum month (or any month during construction). This area would be much smaller if the 250 MW plant were replaced with a 125 MW plant solar trough area. The reduction in particulate would be comparable in scale to the construction phase gaseous pollutant reductions estimated in this paragraph. Instead, the analysis presents the same percentage reductions realized when the cooling towers were removed from the project (Alternative A), of only 3% and 9% for PM_{10} and $PM_{2.5}$, respectively. But it is clear the two particulate emission reductions from these two project alternations are not related at all. The estimated reduction in particulate species emissions should be revised in the DEIS.	Thank you for your comment. Construction-related emissions described in Section 4.2.6.1.1 and Table 4.11 of the draft EIS were not scaled in the analysis. Rather, the emissions were taken directly from Appendix A of the Air Quality Technical Report. The particulate matter emissions in the Proposed Action are based on the maximum construction emissions reported for the 250-MW block, whereas the emissions for Alternative B are the maximum estimated construction emissions for the 125-MW block. The differences between these two do not represent scaling but rather differences in projected construction activity.
34	148-G	AQ-2	Facility emissions	The FEIS should discuss additional or alternative equipment capable of increasing the facility's efficiency or reducing emissions of NOx and PM_{10}.	As explained in Section 4.2.1 Regulatory Requirements, Mitigation and Monitoring Measures (and Table 1.5) of the draft EIS, the SSEP facility would be required to obtain a Title V Air Quality Operating Permit from the MCAQD. As explained in the section, the SSEP would be required to apply suitable Best Available Control Technologies (BACT) as part of this permitting process. These would include BACT measures for NO_x and PM_{10}. The BACT measures identified in the permitting analysis are applied to the emissions inventory in the draft EIS and final EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
36	148-G	AQ-2	Facility Emissions	The project sponsor should consider joining EPA's SF6 Emission Reduction Partnership for Electric Power Systems (http://www.epa.gov/highgwp/electricpower-sf6Ibasic.html), and, at a minimum, consider: • Annual inspection and estimation ofSF6 emissions using an emissions inventory protocol; • For equipment that will contain SF6, purchase only new equipment that meets International Council on Large Electric Systems (CIGRE) standards for leakrates; • Implement SF6 recovery and recycling; and • Ensure that only knowledgeable personnel handle SF6.	Thank you for your comment. If SF6 is used, the Project would follow industry standards and protocols to minimize and avoid SF6 leaks and releases by using leak detection, monitoring, and repair. Boulevard and its parent companies also recycle SF6 and train their High Voltage Technicians regarding all policies for managing SF6 gas. During breaker maintenance periods, SF6 gas would be evacuated from breakers to avoid any release into the atmosphere. Boulevard may investigate the possibility of participating in this partnership in the event that SF6 is used and this has been added to Section 4.3.10 of the final EIS.
83	150-O	AQ-2	Facility Emissions	From Attachment A, scoping letter: The DEIS should also include an analysis of the cumulative effect of a natural gas plant's operation to Region One's hour and eight hour non-attainment zone for Ozone and the non-attainment zone for Carbon Monoxide.	Thank you for your comment. Table 4.10 of the draft EIS includes an analysis of the contribution of the natural gas plant's operation to the 8-hour carbon monoxide standard. Dispersion modeling would be required to evaluate contributions to exceedances of the ozone NAAQS, however the emissions analysis of ozone precursors NOx and VOCs in Table 4.9 of the draft EIS serve as a suitable surrogate for ozone.
8	139-G	AQ-3	Vehicle Emissions	Therefore, a requirement to create and utilize a vanpool system for employees should be mandatory. Other large power generators in the area employ a vanpool transportation system to mitigate air emissions.	Thank you for your comment. The creation of a vanpool system for employees has been added to Section 4.2.10 of the final EIS as potential mitigation for air quality.
5	143-B	AQ-4	Modeling	Boulevard has several concerns regarding the interpretation and presentation of information regarding air quality and emissions during both construction and operational phases of the Project, particularly concerning the discussion of National Ambient Air Quality Standard (NMQS) exceedances. Review of the Air Quality resource section in Chapter 4 has revealed a number of significant concerns with the analysis. One is the attempt to link monitored local wind data with occurrences of measured inhalable particulate (PM_{10}) concentrations that are above NAAQS. There is no scientific or statistical rationale that supports a correlation between wind speed data (the basis for which is not clearly defined in the DEIS) and local PM_{10} 24-hour concentrations. This type of analysis is misleading, and it is an erroneous cause and effect relationship. From the qualitative observation that elevated PM 10 concentrations have occurred on a few days with higher winds, the DEIS concludes that wind speed is a predictor of NMQS exceedances, however, there is no statistical support for such a conclusion, as many higher wind days occur with no such exceedances.	The referenced analysis relating specific exceedance events to high wind conditions has been modified to compare hourly maximum wind concentrations to thresholds identified as triggers in windblown dust in MAG 2008 (6 mph and 14 mph) at select monitoring points in the nonattainment area (MAG 2008). Additional discussion on other causative factors, such as inversions, has also been expanded.
102	143-B	AQ-4	Modeling	pg 4-33 Section 4.2.6.2 First paragraph: The sentence beginning "Under Alternative B, the SSEP would contribute at most an additional 0.38 µg/m^3 of PM_{10} during a 24-hour period" must be reworded. This is the same comment expressed for Section 4.2.4.2, above. The text compares the project impacts to the >150 µg/m^3 magnitude values occasionally observed at Buckeye, and subjectively concludes that the potential maximum contribution of 0.25% to 150 µg/m^3 represented by the SSEP must be additive to the Buckeye concentrations and therefore; "would also increase the frequency of these exceedances." There is no technical basis for this gross oversimplification absent a modeling exercise. See prior comment for rewording recommendation. The existing characterization will mislead the public, and will erroneously lead to the inference that any new, even minor source emissions anywhere within the geographic limits of a non-attainment area automatically causes or contributes to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defensible.	Thank you for your comment. The text has been modified to reflect that the project is unl kely to contr bute to NAAQS exceedances.
2	3-G	AQ-5	Mitigation	The following measures are recommended to reduce disturbance of particulate matter including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site: Site Preparation and Construction: a. minimize land disturbance; b. suppress dust on travelled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust from entering ambient air; c. cover trucks when hauling soil; d. minimize soil track-out by washing or cleaning trucks wheels before leaving construction site; e. stabilize the surface of soil piles; f. create windbreaks.	Thank you for your comment. In the final EIS these mitigation measures have been added to Section 4.2.10.
3	3-G	AQ-5	Mitigation	The following measures are recommended to reduce disturbance of particulate matter including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site: Site Restoration: a. revegetate any disturbed land not used; b. remove unused material; c. remove soil piles via covered trucks.	Thank you for your comment. In the final EIS these mitigation measures have been added to Section 4.2.10.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	3-G	AQ-5	Mitigation	Refer to the attached for rules applicable to reducing dust during construction, demolition and earth moving activities. Arizona Administrative Code-18-2-604 through 607 Arizona Administrative Code R18-2-804 Maricopa County Code Rules 310 and 310.01	Thank you for your comment. Maricopa County Code Rules 310 and 310.01 are incorporated into Table 4.1 in the draft EIS. The Arizona Administrative Codes have been added to the final EIS in Table 4.1.
2	10-G	AQ-5	Mitigation	The following measures are recommended to reduce disturbance of particulate matter including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site Site Preparation and Construction: a. minimize land disturbance; b. suppress dust on travelled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust from entering ambient air; c. cover trucks when hauling soil; d. minimize soil track-out by washing or cleaning trucks wheels before leaving construction site; e. stabilize the surface of soil piles; f. create windbreaks.	Thank you for your comment. In the final EIS these mitigation measures have been added to section 4.2.10.
3	10-G	AQ-5	Mitigation	The following measures are recommended to reduce disturbance of articulate matter including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site: Site Restoration: a. revegetate any disturbed land not used; b. remove unused material; c. remove soil piles via covered trucks.	Thank you for your comment. In the final EIS these mitigation measures have been added to Section 4.2.10.
106	143-B	AQ-5	Mitigation	pg 4-36 Section 4.2.8 Second paragraph. Later in the paragraph, it is stated that "mitigation during high wind events would need to offset all of the emissions during high wind events" (emphasis added). Again, this is not phrased as though offsets are an option for mitigation that might or might not be appropriate, necessary or feasible. As in the prior comment on this paragraph, reliance on a correlation between "windy events" and NAAQS exceedance to justify a mitigation measure is not supportable on any scientific grounds.	Under the National Environmental Policy Act the BLM may consider all feasible mitigation to reduce or eliminate environmental impacts. However, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS. Further, Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions."
107	143-B	AQ-5	Mitigation	pg 4-36 4 Section 4.2.8 Second paragraph. Later in the paragraph appears the statement: "Historically, wind over 20 mph occur 0.8% of the time (3 days per year)." This is a misleading use of a simplified statistic. The highest winds occur for a small percentage of the time, in large part, because they predominantly accompany brief "monsoon" season windstorms in July-September. High winds of <1 hour sustained or in <1 minute gusts are scattered unpredictably over several months during the year in different locations within the Salt River Valley airshed. In stark contrast, this existing DEIS statement will give the public the erroneous impression that off-site "mitigation" during just 3 days/year of windstorms is all that is necessary. Rather, enhanced mitigation triggered by the onset of brief wind events that are distr buted widely and unpredictably is arguably not feas ble at all, and at best would not be as effective as this discussion would imply. These considerations expose the off-site mitigation option as not rational, and it should be omitted from the DEIS.	The referenced analysis relating specific exceedance events to high wind conditions has been modified to compare hourly maximum wind concentrations to thresholds identified as triggers in windblown dust in MAG 2008 (6 mph and 14 mph) at select monitoring points in the nonattainment area (MAG 2008). Additional discussion on other causative factors, such as inversions, has also been expanded. However, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS. Further, Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions."
109	143-B	AQ-5	Mitigation	pg 4-36 Section 4.2.8 Second paragraph, fifth bullet. In this instance the mention of enhanced off-site mitigation of dust emissions is at least prefaced as possible options that "could be implemented." But the text of this bullet poses "Implementation of off-site mitigation to offset all remaining construction emissions." This measure in practice could not be implemented; as it is vague and unquantifiable. See other comments on this Section. These considerations expose the off-site mitigation option as ill not rational [sic], and it should be omitted from the DEIS.	The bullet and section referenced by the commenter relate to operational phase emissions rather than construction phase emissions (the wording in the comment). Under the National Environmental Policy Act the BLM may consider all feasible mitigation to reduce or eliminate environmental impacts. However, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS. Further, Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
111	143-B	AQ-5	Mitigation	pg 4-36 Section 4.2.8 Third paragraph and bullet. This paragraph states "During the operational phase of the project, off-site mitigation is the only feasible mitigation option to eliminate the entire contr bution of the SSEP during a 24-hour period…in order to avoid contributing to a NAQQS exceedance" (emphasis added). Several issues must be cited, any one of which support removal of this entire vein of discussion from the EIS. First and foremost, there is no justification whatsoever for stipulating that mitigation must even approach eliminating or offsetting the entire operational phase contribution of the SSEP to local emissions. The facility is clearly shown to be a Minor Source of emissions, in particular PM_{10} emissions, during operations. The requirement to somehow offset Minor Source emissions is not imposed by rule even in a Serious non-attainment area. Second, if this DEIS were to set such a precedent, it is probable that any and all federal projects with minor source level particulate emissions could not practically comply. For example federal projects such as operation of a short section of new dirt road in an urban monument, or addition of a small emergency generator on a suburban military base, would have to demonstrate "off-site" emissions offsets. Third, the implementation of off-site mitigation is presumed to be necessary to avoid contributing to non-attainment concentrations caused by high wind events. Other comments presented here discuss the fallacy of connecting non-attainment particulate concentrations to wind conditions (refer to Section 3.2.4.1.1). To propose that this same argument now supports an impractical off-site mitigation requirement is to rely on a house of cards to impose a substantive and unwarranted financial burden on the Project. Lastly, even if off-site mitigation could be reasonably implemented it would not effectively address the perceived significant impact criteria. It cannot be shown that future non-attainment concentrations at distant monitors will be reduced by this mitigation option for the minor source operational phase emissions of the SSEP. Based on this reasoning, the proposal to require off-site mitigation for operational phase emissions should be omitted from the DEIS.	Under the National Environmental Policy Act the BLM may consider all feasible mitigation to reduce or eliminate environmental impacts. However, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS. Further, Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions."
33	148-G	AQ-6	Permitting	The FEIS should briefly discuss emission controls contained in the air permit application.	As explained in Section 4.2.1 Regulatory Requirements, Mitigation and Monitoring Measures (and Table 1.5) of the draft EIS, the SSEP facility would be required to obtain a Title V Air Quality Operating Permit from the MCAQD. As explained in the section, the SSEP would be required to apply suitable Best Available Control Technologies (BACT) as part of this permitting process. The BACT measures identified in the permitting analysis are applied to the emissions inventory in the draft EIS and final EIS.
95	143-B	AQ-7	Construction emissions	pg 4-24 Section 4.2.4.2 End of third paragraph. Similar linkage here as in the prior paragraph between SSEP emissions and distant, monitored NAAQS exceedances, but for the construction phase. In the case of construction emissions there is no model-predicted off-site concentration information. However, the text still draws the unsupported conclusion that "construction emissions would l kely contr bute as much or more to the existing exceedances of NAAQS as would operational emissions." It cannot be directly concluded that construction emissions will contribute to monitored exceedances any more than is the case for operational phase emissions. The existing characterization will mislead the public, and will erroneously lead to the inference that short-term construction emissions anywhere within the geographic limits of a non-attainment area automatically cause or contribute to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defens ble. It would be more accurate and consistent with precedent analyses of construction activities in other EIS documents to state that; "Construction emissions could result in transient concentrations of particulate or other pollutants that would be higher than the NAAQS, which may constitute significant impacts. But these exceedances would be of short duration (less than 24 hours) and confined to the near vicinity of the project area boundary."	Thank you for your comment. The referenced statement has been revised to read: "However, these emissions would not exceed the major source threshold (see Table 2.2) and therefore are unlikely to contribute to the existing exceedances of NAAQS."
99	143-B	AQ-7	Construction emissions	pg 4-30 Section 4.2.5.2 End of second paragraph. Similar linkage here as in the prior paragraph between SSEP emissions and distant, monitored NAAQS exceedances, but for the construction phase. This is the same comment expressed for Section 4.2.4.2, above. It cannot be directly concluded that construction emissions will contribute to monitored exceedances any more than is the case for operational phase emissions. The existing characterization will mislead the public, and will erroneously lead to the inference that short-term construction emissions anywhere within the geographic limits of a non-attainment area automatically cause or contribute to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defens ble. It would be more accurate and consistent with precedent analyses of construction activities in other EIS to state that; "Construction emissions could result in transient concentrations of particulate or other pollutants that would be higher than the NAAQS, which may constitute significant impacts. But these exceedances would be of short duration (less than 24 hours) and confined to the near vicinity of the project area boundary."	Thank you for your comment. The referenced statement has been revised to read: "However, these emissions would not exceed the major source threshold (see Table 2.2) and therefore are unlikely to contribute to the existing exceedances of NAAQS." The analysis in the draft EIS assumed that an increase in emissions of PM_{10} would be proportional to an increase in concentrations of PM_{10}. The BLM agrees that this approach to estimating concentrations is too coarse given the complicated and dynamic processes (such as meteorology) that contribute to the ultimate concentrations of constituents (such as PM_{10}) present in the atmosphere at any given time. In Section 4.2 of the final EIS the impact analysis related to 24-hour PM_{10} has been revised. In the final EIS the total air emissions of each alternative and the total percent increase in Maricopa County emissions are compared between alternatives. Further, language similar to that suggested by the commenter has been incorporated into the final EIS in the referenced section.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
101	143-B	AQ-7	Construction emissions	pg 4-32 Section 4.2.6.1.1 Second paragraph. The methodology for the percentage reduction in monthly emission rates for construction phase of Alternative B should be documented. The values are presented with no context or reference to calculations. Recommend including these calculations in a footnote.	The construction emissions for all alternatives, including Alternative B, were taken directly from the emissions inventory in Appendix A of the Air Quality Technical Report. No percent reduction calculations were made. Section 4.2.7.1.1 of the final EIS has been revised to attribute the emissions information to the project emissions inventory conducted by Farmer (2010). In Alternative A, maximum emissions were based on construction of a 250-MW block and for Alternative B maximum emissions were based on construction of a 125-MW block.
103	143-B	AQ-7	Construction emissions	pg 4-33 Section 4.2.6.2 End of second paragraph. Similar linkage here as in the prior paragraph between SSEP emissions and distant, monitored NAAQS exceedances, but for the construction phase. This is the same comment expressed for Section 4.2.4.2, above. It cannot be directly concluded that construction emissions will contribute to monitored exceedances any more than is the case for operational phase emissions. The existing characterization will mislead the public, and will erroneously lead to the inference that short-term construction emissions anywhere within the geographic limits of a non-attainment area automatically cause or contribute to distant NAAQS exceedances. This conclusion is not appropriate, scientifically plausible, or defens ble. It would be more accurate and consistent with precedent analyses of construction activities in other EIS to state that; "Construction emissions could result in transient concentrations of particulate or other pollutants that would be higher than the NAAQS, which may constitute significant impacts. But these exceedances would be of short duration (less than 24 hours) and confined to the near vicinity of the project area boundary."	Thank you for your comment. The referenced statement has been revised to read: However, these emissions would not exceed the major source threshold (see Table 2.2) and therefore are unlikely to contribute to the existing exceedances of NAAQS.
104	143-B	AQ-7	Construction emissions	pg 4-36 Section 4.2.8 First paragraph: This states that SIP Conformity criteria for MAJOR sources should be considered the appropriate NEPA Significance Criteria, although the SSEP is demonstrably a MINOR source. It is recognized that the General Conformity rules (or other rules) can provide guidance to identify a Significance criteria, but any criteria pertaining only to Major sources can't be arbitrarily applied to Minor sources, as is done here. Even the PM_{10} non-attainment area SIP in Maricopa County does not apply the same level of control stringency to Minor sources as is imposed on Major sources. This EIS should not presume that the construction phase will be demonstrated to have any emissions above Major source thresholds. In addition, there is precedent, if not stated EPA policy, that an individual Minor source cannot, essentially by definition, be deemed as contributing to non-attainment area NAAQS exceedances. The critical presumption that an individual MINOR source is inherently very unlikely to contribute to NAAQS exceedances at a distant monitor or urban area must be included here to qualify and give a defensible balance to the first paragraph discussion.	Thank you for your comment and recommendations. At the time of publication of the draft EIS the question of whether the SSEP represented a major source or a minor source was not definitive. Since publication of the draft EIS the proponent has committed to limiting emissions during construction and operations to less than the major source threshold for PM_{10}. This commitment has been added to the list of applicant-committed measures in Table 2.2. The referenced paragraph has been removed.
113	143-B	AQ-7	Construction emissions	pg 4-36 Section 4.2.8 Third paragraph bullet: The estimated peak month emissions from the construction phase are wrongly associated in this bullet with an operational phase measure. If the estimated maximum operational phase emissions were uniformly distributed over a year, then 40.9 tpy of PM_{10} would be 9.3 bs/hr, not 24.4 b/hr as stated here. Further, the off-site mitigation "would also account for annual emissions of particulate matter estimated to be 40.9 tpy PM_{10}, and 22.2 tpy $PM_{2.5}$." There is no non-attainment area rationale to include $PM_{2.5}$ in this (albeit unsupportable and unwarranted) mitigation option. It is generally recognized that $PM_{2.5}$ emissions are almost exclusively from fuel combustion sources, with little from windblown dust. These considerations expose the off-site mitigation option as ill-conceived and not reasonable, and it should be omitted from the DEIS.	Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions." In addition, because the emissions inventory indicates that the operational phase project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS.
6	139-G	AQ-8	Dust	Requiring the use of a dust palliative in this area during the operational life of the facility would decrease the propensity for the creation of fugitive dust. If some type of palliative was required under the solar collection assemblies, it might also decrease the cubic yards of contaminated soil that need to undergo remediation annually. Controlling fugitive dust is a critical practice to maintain the generation efficiency of the project by minimizing the amount of dust that may settle on the solar panels.	Thank you for your comment. The use of dust palliatives is an applicant-committed measure described in Table 2.1 of the draft EIS. It is incorporated into the impact analysis in Sections 4.2.4.1.1 and 4.2.4.1.2 of the draft EIS.
7	139-G	AQ-8	Dust	Since the proposed site is located within the non-attainment area for air quality, the creation of dirt roads should not be permitted. All roads, regardless of size, should be required to be paved, including the site's approximate four-mile entry road along the Jojoba Road alignment off SR 85. This would also eliminate the introduction of magnesium chloride (MgCl) in to the soil, which was suggested as a potential dust coating.	Thank you for your comment. Paving, graveling, and/or applying dust palliatives to all road surfaces on the Project Area is included in Section 4.2.8 of the draft EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
115	143-B	CC-1	General Comment	pg 4-38 Section 4.3.1 Most of the language in this section regarding regulatory requirements and permitting authority is not relevant to the Climate Change topic. This section should be reduced to just address the GHG monitoring rule, which is administered by the U.S. EPA. It is not clear as yet what role, if any, MCAQD will be delegated to have with respect to this program. The MCAQD Rule 241 discussion is particularly misplaced in this section. The Rule 241 requirements are relevant to criteria pollutant requirements, so should be re-located in Section 4.2.1, where BACT is discussed, but not the underlying Rule 241 driver	Thank you for your comment. In the final EIS discussion of MCAQD Rule 241 has been put into context within this section. Although the rule does not directly control GHG emissions, the requirements for new sources do result in reduced emissions of some GHGs.
116	143-B	CC-1	General Comment	pg 4-39 Section 4.3.3 Second paragraph. It is incorrect to state that "SSEP's MCAQD Rule 241 permit application" serves as the driver for limiting gas fired generation to no more than 25% of total output. This operating constraint has been adopted to comply with federal criteria that limit fossil-fuel fired supplemental power for projects that seek to meet the definition of a "solar energy project" to qualify for financial incentives. The Proposed Action includes this constraint as a feature of the Project, and it is also described in the MCAQD Rule 210 Title V permit application for the SSEP. Revise the wording of this paragraph, omitting reference to Rule 241 as the regulatory driver.	Thank you for your comment. Section 2.5.2.2.5 of the final EIS has been updated to reflect the regulatory drivers for limiting natural gas co-firing to 25% of total output. The statement related to MCAQD rule 241 in Section 4.3.2 has been removed from the final EIS.
59	150-O	CC-1	General Comment	from Attachment A, scoping letter: All of these attributes contr bute to the possibility that development of a commercial scale solar facility on this site could result in an overall benefit in limiting the negative impacts of climate change on public lands by decreasing the amount of greenhouse gas emissions from electricity production. However, as described below, the BLM will need to do a thorough analysis of the project's carbon footprint in order to determine the overall impact of the project and its potential benefits.	Thank you for your comment. Climate change related impacts of the Proposed Action and alternatives are described in Section 4.3 of the draft EIS.
77	150-O	CC-2	GHG Calc Methodology	From Attachment A, scoping letter: Renewable energy development can have multiple public benefits, most importantly combating climate change by reducing greenhouse gas (GhG) emissions from energy production, and including reduced local and regional air and public health impacts, increased energy resource diversity and decreased price volatility. A reduction in GhG emissions from developing renewable energy is based on comparative emissions from fossil fuel-based energy production. Because a reduction in GhG emissions is a primary public benefit of renewable energy development, it is critical that the agencies quantify this reduction to the extent possible. The agencies' analysis of GhG reductions should also include a comprehensive look at the project's impacts, including GhG emissions during manufacture, construction, operation, decommissioning, and reclamation of the project site. The results of this analysis should then be compared to similar analyses for fossil-fuel based energy production, including combined-cycle natural gas fired and coal fired power plants. Such an analysis will provide the public a clear indication of the costs and benefits of the proposed project and allow stakeholders to make decisions regarding the project based on the best available science and data.	Thank you for your comment. Section 4.3 of the draft EIS includes a comprehensive summary of GHG emissions associated with the SSEP under each alternative. To provide context to these estimates, the emission intensity of the project is compared to the average emission intensity for the regional grid that includes a mix of energy sources.
78	150-O	CC-2	GHG Calc Methodology	From Attachment A, scoping letter: This project will use gas hybridization option in lieu of a thermal storage system. Although the project's fact sheet claims that two gas-fired boilers will be used to reduce startup time and provide freeze protection for the synthetic oil in the super heater, NextEra has indicated that gas will be used to supplement solar energy in generating power (NextEra stated that up to 25% of the power generated might be from gas). The BLM and NextEra need to provide an estimated range for the amount of carbon dioxide that will be generated annually by the plant's operation. The configuration of the plant is dependent on the capacity output that is needed from the plant by the purchaser of the power. NextEra needs to provide the energy profile (capacity factor and time of energy output) that is desired from the plant so the public will have a better understanding of the project's proposed use of natural gas.	Given that natural gas co-firing for energy production is at the offtakers option to meet peak load demand it is not possible to pinpoint the degree of natural gas co-firing that would occur following project implementation. However, 25% of energy production is the maximum energy output any offtaker would be able to produce using natural gas co-firing. More discussion concerning the range of possible natural gas co-firing up to 25% has been added to Section 2.5.2.2.5 of the final EIS. Further, Section 4.3 of the draft EIS includes a comprehensive summary of GHG emissions associated with the project. This includes carbon dioxide emissions associated with the natural gas component. In the final EIS Section 4.3 has been updated to show the range of CO_2 emissions possible for the project. Plant start-up and freeze protection uses dictate the minimum amount of natural gas required to operate the SSEP.
81	150-O	CC-2	GHG Calc Methodology	From Attachment A, scoping letter: The agencies should comprehensively analyze the Sonoran Solar Energy project's net reductions to GhG emissions, including GhG emissions during manufacture, construction, operation, decommissioning, and reclamation of the project site. The analysis should consider both the potential for the project to reduce GhG emissions as well as potential for the project to increase GhG emissions, for example, by disturbing undisturbed land currently useful for carbon sequestration. The results of this analysis should then be compared to the same type of analysis for fossil-fuel based energy production, including combined-cycle natural gas fired and coal fired power plants.	Thank you for your comment. Section 4.3.4 of the draft EIS includes a comprehensive summary of GHG emissions associated with the SSEP. To provide context to these estimates, the emission intensity of the project is compared to the average emission intensity for the regional grid that includes a mix of energy sources.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
20	161-G	CC-3	GHG Source Comment	Section 4.3.4.1 Emissions from Construction, Vegetation Loss, and SSEP Operations mentions the following: "Once the Project Area vegetation has been cleared, it would be sent to area landfills where its decay would result in methane GHG emissions that would not otherwise occur." We question why such a huge volume of natural material should be sent to a landfill, shortening its lifespan and hastening the need for a new landfill site. We suggest that an estimate be made of the volume of vegetation.	The draft EIS used a conservative approach to estimate total metric tons of carbon dioxide equivalents that would be generated as a result of project activities, including site grading. Calculating the volume of vegetation would require speculative assumptions regarding density and total vegetation weight and, as a result, would not improve analysis of project greenhouse gas emissions. Section 4.3.10 of the final EIS has been updated to include a potential mitigation measure to reduce landfilling of cleared vegetation by sending this material to a composting facility.
60	150-O	CC-4	Mitigation	From Attachment A, scoping letter: Through the permitting process, the BLM, Arizona Corporation Commission (ACC), and NextEra may be able to develop this project in a way that supports climate change goals while adequately minimizing and mitigating impacts.	Thank you for your comment.
1	137-T	CUL-1	General Comment	Concur with National Register elig bility recommendations for the nine cultural resource sites described in the archaeological technical report. The three National Register elig ble sites should be avoided, preserved and protected in open space if the project proceeds.	Thank you for your comment. The BLM has consulted with the Arizona SHPO, tr bes and the public to determine the NRHP elig bility of the cultural resources (historic properties) recorded within the area of potential effect (APE). By letter dated March 22, 2010, Ann Valdo Howard, SHPO archaeologist, concurred with the BLM's determination that three historic properties within the APE are elig ble for the NRHP under criterion D of 36 CFR 60.4. These properties, AZ T:10:238 (ASM), T:14:165 (ASM), and T:14:167 (ASM) are prehistoric artifact scatters associated with the Hohokam Tradition. If an action alternative is determined to have an adverse effect on these NRHP eligible historic properties in the APE, then actions would be taken to avoid, minimize, or mitigate any such adverse effects before project initiation. Two of the eligible properties, which lie within a potential transmission line corridor, would be avoided during construction and operation of the proposed project. However, the third site lies within the area proposed for the solar array under all alternatives and would be directly impacted by construction. For this reason, Section 106 consultations have resulted in a determination of adverse effect. We are consulting with the State Historic Preservation Office (SHPO) and tribes to resolve adverse effects through the development and implementation of a treatment plan and Memorandum of Agreement.
28 (RTC 2 Tab)	162-I	CUL-1	General Comment	In archaeology, avoidance is always the preferred alternative. Relocate the project to already disturbed land and chances are good you'll actually avoid archaeology instead of writing it off to mitigation as a cost of doing business. Ta k about the cumulative impacts of always digging sites instead of truly avoiding them!	Two of the National Register-eligible properties that would be affected by the proposed project could be avoided, and avoidance is the preferred treatment for those sites. However, the third site lies within the area proposed for the solar array under all alternatives. As its avoidance would not be feasible, scientific data recovery is proposed as the primary measure to address adverse impacts. In this region, it is poss ble that the use of disturbed lands in areas of high site density, such as agricultural fields along the Gila River, could affect more sites than the development of undisturbed areas of comparable size that have low site densities. Regarding the cumulative impacts of archaeological excavation; if data recovery is determined to be an appropriate level of mitigation for adverse effects to NRHP-elig ble sites, see Section 4.20.4.3.1 of the draft EIS, which discusses the cumulative impact of collecting information and the physical loss of cultural resources.
4	12-T	CUL-2	Tribal Coordination	We reiterate that if any of the six identified eligible or potentially eligible prehistoric sites will be adversely affected by project activities, we look forward to continuing consultation including to be provided with a copy of any proposed treatment plan for review and comment.	The BLM has consulted with the Arizona SHPO, tr bes and the public to determine the NRHP eligibility of the cultural resources (historic properties) recorded within the area of potential effect (APE). By letter dated March 22, 2010, Ann Valdo Howard, SHPO archaeologist, concurred with the BLM's determination that three historic properties within the APE are elig ble for the NRHP under criterion D of 36 CFR 60.4. These properties, AZ T:10:238 (ASM), T:14:165 (ASM), and T:14:167 (ASM) are prehistoric artifact scatters associated with the Hohokam Tradition. If an action alternative is determined to have an adverse effect on these NRHP eligible historic properties in the APE, then actions would be taken to avoid, minimize, or mitigate any such adverse effects before project initiation. Two of the eligible properties, which lie within a potential transmission line corridor, could be avoided during construction and operation of the proposed project. However, the third site lies within the area proposed for the solar array under all action alternatives and would be directly impacted by construction. For this reason, Section 106 consultations have resulted in a determination of adverse effect. The BLM is consulting with the SHPO and tribes to resolve adverse effects through the development and implementation of a treatment plan and Memorandum of Agreement. Please refer to Section 5.4 of the final EIS for further details.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
63	150-O	CUL-2	Tribal Coordination	From Attachment A, scoping letter: Additionally, we strongly urge the BLM to begin the Section 106 process under the National Historic Preservation Act (NHPA), 16 U.S.C. § 470(f), The requirements of NHPA are separate from NEPA's requirements, although the Section 106 regulations encourage federal agencies to coordinate the two processes. See 36 C.F.R. § 800.2(a)(4). Proper coordination of the NHPA and NEPA compliance actions is necessary to ensure that adverse effects to historic properties are adequately considered pursuant to the Section 106 regulations, 36 C.F.R. § 800, et seq. Proper coordination with Native American tribes will be a central component of the consultation process.	Thank you for your comment. As discussed in Sections 3.4.5.1 and 3.4.6 of the draft EIS, BLM initiated NHPA Section 106 consultation in July 2009. The final EIS has been modified in Section 5.4 to provide information about the status of consultation since the publication of the draft EIS. A full description of government–to-government consultation can be found there.
2	137-T	CUL-5	Methodology	No cultural landscape study done as part of cultural resources study– cultural landscape study needs to be completed and sent to tribes for review.	Existing information indicates that there were places and natural landmarks of traditional importance to the O'odham and Maricopa peoples along the Gila River and in the Estrella Mountains. No traditional places have been identified within the proposed Project Area, which likely was a corridor for travel between the river and mountain ranges to conduct seasonal subsistence activities and likely was used for temporary activities of resource exploitation and camping. If the project were to be approved with scientific data recovery as part of a mitigation strategy to resolve adverse effects on AZ T:10:238 (ASM), BLM will require that the final report include a discussion of the site's role within the surrounding cultural and environmental landscape. Tribes will be provided the opportunity to comment and offer additional information relevant to the final report.
62	150-O	CUL-5	Methodology	From Attachment A, scoping letter: The BLM must adequately evaluate the environmental consequences of the proposed project on historic resources. They must address cultural resource issues in the DEIS. The NEPA regulations recognize that impacts to cultural resources such as historic properties and "scientific resources" can comprise a significant impact on the environment. 40 CFR 1508.27(b)(3),(8). Additionally, the BLM must analyze the direct, indirect, and cumulative impact of each alternative on areas of importance to local tribes and areas of high cultural site density. Recommendation: The BLM should prioritize protection of the area's outstanding cultural resources, including study of the area's resources, development of strategies to minimize and mitigate impacts, and ongoing engagement in consultation with local Native American tribes. The BLM should perform a class III survey to thoroughly assess the site's archaeological resources and the DEIS should analyze thoroughly the impacts and should include an alternative that minimizes and mitigates impacts to cultural resources.	Thank you for your comment. A Class III survey was conducted in 2009 (see Section 3.4.1 of the draft EIS); of the nine archaeological sites identified, three were determined eligible for the National Register of Historic Places. The draft EIS includes a full discussion of the existing cultural resources and poss ble impacts, including direct, indirect, and cumulative impacts, on historic properties and other cultural resources (see Sections 3.4, 4.4, and 4.20.4.3 of the draft EIS). A full description of government to government (including tribal) consultation is included in Chapter 5 of the final EIS, Section 5.4.
27 (RTC 2 Tab)	162-I	CUL-5	Methodology	Perhaps I missed it, but the report does not seem to indicate whether or not the entire project area was actually subjected to a comprehensive 100% cultural resource survey. Who did the survey? Where they qualified archaeologists with specialized knowledge of the survey area? What is the title of the survey report? What is the 8000 acre number mentioned in one section? Why is there no mention of prehistoric trails which are extremely common in the area? Did the consultant not look for them, or perhaps not recognize them?	Thank you for your comment. A Class III survey of the entire Project Area was conducted in 2009 (EPG 2009a) (see Section 3.4.1 of the draft EIS) and nine archaeological sites were identified. Please note that the intensive cultural resource survey covered an area of 8,628 acres, which is larger than the final project proposal. The larger survey area allowed for flexibility in the project design, as well as a more comprehensive inventory of cultural resources. No trails were found in the surveyed area. The report by EPG cites relevant observations from a nearby archaeological study. During the documentation of trails along SR-85 west of the proposed project, archaeologists from Arizona State University and the Gila River Indian Community noted that visible linear clearings or depressions in the ground surface were no longer apparent when one reached the alluvial flats of Little Rainbow Valley. More diffuse but apparently linear distributions of isolated artifacts, observed in both studies, could indicate general corridors of travel between the Gila River and mountain ranges. The Environmental Planning Group (EPG) conducted this survey; EPG holds a BLM Cultural Resource Use Permit. As a federal land managing agency, the BLM is responsible for complying with legislation pertaining to cultural resources on lands managed by the BLM. Permits for archaeological investigations are issued to qualified academic and scientific institutions, cultural resources consulting firms, State agencies, and other qualified institutions and/or individuals to conduct professional cultural resources investigations on public lands.
5	135-G	CUM-1	General Comment	The cumulative impacts section should also include the existing solar applications on BLM lands which occur on Lower Colorado Sonoran Desert Creosote-Bursage and Palo-Verde Cactus Mixed Scrub. The smaller area analyzed does not capture the full potential of the cumulative impacts from solar development on these habitat types.	As described in Section 4.20.2.7 of the draft EIS, the cumulative effects assessment area (CEAA) selected for vegetation and wildlife is the Rainbow Valley. Although this smaller area does not capture impacts from other solar developments on BLM lands, we believe it is more suitable than the larger area proposed because it allows a more robust assessment of all of the past, present, and reasonably foreseeable actions affecting these resources than would be possible for all areas of the Lower Colorado Sonoran Desert Creosotebush-Bursage and Palo Verde Cactus Mixed Scrub vegetation communities. The Rainbow Valley CEAA also encompasses slopes, soil, and habitat types similar to the Project Area, as described in Table 4.84 of the draft EIS.
3	144-G	CUM-1	General Comment	Map 26-Reasonably Foreseeable Actions: Please include entire length of the Hassayampa Freeway on this map to show the regional significance of the project and title it "Hassayampa Freeway" instead of "Transportation".	Map 26 (now Map 32 in the final EIS) has been revised to show the length of the freeway within the map's area. The Hassayampa Freeway is already labeled "Hassayampa Freeway" on the map. The label "Transportation" is used in the legend because there are multiple reasonably foreseeable transportation actions depicted on the map.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
9	161-G	CUM-1	General Comment	We are concerned about the cumulative impact of man-made degradation to the surrounding desert. In the vicinity, there already is a prison complex, a landfill, a gravel pit on public land just east of the park, the Wesco pits, and three more pits farther east. Many of these facilities are on public land and all appeared on the landscape just within the last 20 years. Farther away, we are concerned about the fragmentation of public land and viewsheds by similar energy facilities across the West.	Thank you for your comment. Cumulative impacts of the Proposed Action and alternatives are discussed in Section 4.20 of the draft EIS.
9	161-G	CUM-1	General Comment	This project alone will, if built, have a huge negative impact on the land, keeping in mind the many others being proposed, especially along I-10 west of Phoenix, resulting in cumulative impact to the landscape.	Thank you for your comment. Cumulative impacts of the Proposed Action and alternatives are discussed in Section 4.20 of the draft EIS.
117	143-B	GEO-1	General Comment	pg. 4-56 Section 4.5 Geology and Minerals - Impacts are being attr buted to a resource where there are no impacts. According to page 3-30 "Overview" - the impacts would be assessed for unique or sensitive geological features. None were found so why, on page 4-56, are impacts being attributed to geology?	The overview in Section 3.5 Geology and Minerals of the final EIS has been revised to clarify that ***no*** unique or sensitive geologic features or geologic hazards are found in the Project Area. Impacts to geology are descr bed for the deposits and minerals that are found in the Project Area.
118	143-B	GEO-1	General Comment	pg. 4-57 Section 4.5.3.2 Change "course" to "coarse"	The final EIS has been revised as requested.
3	8-I	HAZ-1	General Comment	We have poor roads (dirt) - In the event of an explosion (Hydrogen on site - Gas) we will need to exit site as quickly as poss ble - This is not poss ble.	Thank you for your comment. Table 2.1 of the draft EIS includes a summary of human health and safety measures committed to for the project. The following hydrogen safety measures have been added to that table in the final EIS: "Should Boulevard choose to use a hydrogen cooled generator, all standard industry practices would be employed to safeguard the system and minimize risks. Safeguards include leak detection, pressure/temperature monitoring, automatic generator shutdown, and fire detection/suppression systems."
5	124-I	HAZ-1	General Comment	I have concerns about radiation exposure.	Thank you for your comment. The BLM, in partnership with the Office of Energy Efficiency and Renewable Energy, the Department of Interior, and the Department of Energy are currently preparing a Programmatic Environmental Impact Statement (PDEIS) to evaluate utility-scale solar energy development on public lands. Electrical magnetic field information from the PDEIS has been added to the final EIS in Section 4.6.3.9, Electrical Magnetic Fields.
6	134-I	HAZ-1	General Comment	Please maintain a regular collection of trash thrown on the ground by construction traffic (A regular collection of road kill).	The final EIS has been updated in Section 4.19.5 Potential Mitigation Measures [for Wildlife] to include periodic collection of trash from the project access roads.
119	143-B	HAZ-1	General Comment	pg 4-60 Section 4.6 Hazardous Materials- Impacts are not provided. Stating what is being used/stored does not provide the reader with the impacts to employees or the surrounding area.	Section 4.6 of the draft EIS provides public disclosure concerning the materials used/stored in the Project Area. With the proper application of required plans and protective measures (see Section 3.6.2 of the draft EIS) impacts associated with hazardous materials are not expected from the SSEP.
25	162-I	HAZ-1	General Comment	While the document minimizes the toxicity of several of the chemicals the document says will be used, there is no data. Why not include Material Safety Data Sheets for the listed chemicals? This would allow the public to decide for themselves.	Thank you for your comment. A list of project chemicals and their relative toxicity levels has been added to Section 4.6.3 the final EIS, MSDS sheets for these chemicals can be found online using MSDS clearinghouses such as http://www.ilpi.com/msds/#Internet.
10	139-G	HAZ-2	Soil Contamination	The land-treatment units will cover approximately 15 acres of the site and process 2,250 cubic yards of contaminated soils annually. These soils have been contaminated by heat transfer fluid leaking from the solar collection assemblies or other spills. Once these soils have been remediated, they will be stockpiled on site until which time they are reincorporated into the area as fill. There is no specific period of time needed to remediate the contaminated soils. Neither the Proposed Action nor Alternative A delineated steps that will be implemented to ensure all soils have been fully remediated prior to the closure and decommisioning of the facility.	Section 2.5.4.2.3 of the draft EIS states that hazardous soils would be taken to an approved landfill for disposal. Other soils would be treated to a concentration of 100mg/kg of HTF. As a design feature of all alternatives, this would be a condition of approval for a ROW grant. Section 2.3.1 of the final EIS has been updated to clarify that a Plan of Development would be required if this project is authorized, and attached to the ROD. Per 40 CFR 1505.2(c), the ROD will summarize the monitoring and enforcement of conditions of approval and mitigation measures. The BLM will also stipulate specific project actions or conditions as part of their issuance of a ROW authorization.
9	139-G	HAZ-3	Evaporation Pond Material Disposal	There is no mention of the ponds being remediated (drained and dredged) prior to being back-filled at the close of the project. These ponds will be utilized to evaporate different types of wastewater from the plant's cooling operations. Removing any residual waste materials prior to back-filling should be required.	Section 2.5.5 Termination and Reclamation of the final EIS has been revised to include language describing remediation of ponds, including removal of all residual solids, prior to the close of the project.
12	145-G	HHS-1	General Comment	The Oregon DOT's solar project addressed electrical magnetic fields caused by solar power generation. I recommend addressing electrical magnetic fields in the EIS.	Thank you for your comment. The BLM, in partnership with the Office of Energy Efficiency and Renewable Energy, the Department of Interior, and the Department of Energy are currently preparing a Programmatic Environmental Impact Statement (PDEIS) to evaluate utility-scale solar energy development on public lands. In response to this comment, electrical magnetic field-information from the PDEIS has been added to the final EIS in Section 4.6.3.9, Electrical Magnetic Fields.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
141	143-B	LSG-1	General Comment	pg 4-74 Section 4.8.1 Second sentence. Rewrite to read "Impacts to grazing would consist of acres of forage lost as a result of …"	In the final EIS the sentence has been revised as requested.
142	143-B	LSG-1	General Comment	pg 4-74 Section 4.8.3 First paragraph, third sentence. Rewrite to say "… livestock would no longer be able to graze from vegetation…"	In the final EIS the sentence has been revised as requested.
143	143-B	LSG-1	General Comment	4-74 Section 4.8.3 Bottom paragraph on page, first sentence. Remove comma after "strikes".	In the final EIS the sentence has been revised as requested.
144	143-B	LSG-1	General Comment	pg 4-74 Section 4.8.3 Bottom paragraph on page. Everything except the first sentence are really mitigation measures, perhaps they should be moved to that section.	The paragraph has been revised in the final EIS to remove sentences regarding speed limits and fencing, because these are potential mitigation measures. However, fugitive dust control is an applicant-committed environmental protection measure and is appropriate to discuss in Section 4.8.3
145	143-B	LSG-1	General Comment	pg 4-75 Section 4.8.6 Unsure if this is an error, but is it supposed to be Alternative A instead of B?	The commenter is correct in identifying the error. Section 4.8.7 of the final EIS has been revised to refer to Alternative A instead of Alternative B.
146	143-B	LSG-1	General Comment	pg 4-75 Section 4.8.8 If rebuilding the stock pond is being proposed then why mention impacts if it isn't rebuilt?	The sentence referring to residual impacts from not rebuilding the stock pond has been deleted from Section 4.8.10 of the final EIS. Language has been added to clarify the residual impacts to livestock grazing that would occur despite the rebuilt stock pond.
147	143-B	LSG-1	General Comment	pg 4-75 Section 4.8.8 First sentence. Rewrite to read "Rebuilding the stock pond would allow cattle to continue to forage in the area."	Thank you for your comment. The content is correct as written.
148	143-B	LSG-1	General Comment	pg 4-75 Section 4.8.8 Second sentence. Replace "have access" with "be able".	This sentence has been deleted from Section 4.8.10 of the final EIS to clarify residual impacts.
149	143-B	LSG-1	General Comment	pg 4-75 Section 4.8.8 Last sentence. Should the first reference to the word "forage" really be "foliage"?	This sentence has been deleted from Section 4.8.10 of the final EIS to clarify residual impacts.
150	143-B	LSG-1	General Comment	pg 4-76 Section 4.8.9 First sentence. Replace "via" with "because of".	In the final EIS the sentence has been revised as requested.
151	143-B	LSG-1	General Comment	pg 4-76 Section 4.8.10 Last sentence. Remove both commas.	In the final EIS the sentence has been revised as requested.
34	143-B	LU-1	General comment	pg 3-38 Section 3.7.2 Last paragraph, put acronym in for ACC (it is repeated later)	Because the abbreviation ACC is already being used for air-cooled condenser, we have spelled out all occurances of Arizona Corporation Commission.
35	143-B	LU-1	General comment	pg 3-39 Section 3.7.2 First bullet, second sentence. Change sentence to read "This programmatic EIS amends the …"	Thank you for your comment. In the final EIS the first bullet, second sentence of Section 3.7.2 has been revised accordingly.
36	143-B	LU-1	General comment	pg 3-40 Section 3.7.3.1 Second paragraph. Combine second and third sentences to read "The monument is managed under the Lower Gila South RMP to protect …"	Thank you for your comment. In the final EIS Section 3.7.3.1 has been revised accordingly.
37	143-B	LU-1	General comment	pg 3-41 Section 3.7.3.2 Change final sentence to read "A ROW would be needed from the Arizona …"	Thank you for your comment. In the final EIS Section 3.7.3.2 has been revised accordingly.
38	143-B	LU-1	General comment	pg 3-42 Section 3.7.4 First paragraph, second sentence. Remove comma after Project Area.	Thank you for your comment. In the final EIS Section 3.7.4 has been revised accordingly.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
39	143-B	LU-1	General comment	pg 3-42 Table 3-18 For lease number 16-110986, the location should say "Traverses".	Thank you for your comment. In the final EIS Table 3-18 has been revised accordingly.
40	143-B	LU-1	General comment	pg 3-42 Table 3-18 For lease 72-011068, it should read "Traverses the land-use analysis area north to south, west …"	Thank you for your comment. In the final EIS Table 3-18 has been revised accordingly.
41	143-B	LU-1	General comment	pg 3-42 Table 3-18 For lease number 14-106487/14-1-107947, the switchyard is actually north of the Komatke Road alignment.	Thank you for your comment. In the final EIS Table 3-18 has been revised accordingly.
42	143-B	LU-1	General comment	pg 3-43 Table 3-18 For lease number 18-106512, change the location to read "Traverses the land-use analysis areas east from the Southwest …"	Thank you for your comment. In the final EIS Table 3-18 has been revised accordingly.
43	143-B	LU-1	General comment	pg 3-44 Table 3-19 For serial number AZA 31607, there is a problem in that it lists Sections 5 and 5. That should probably be a different section.	Thank you for your comment. The correct Sections are 28-30 of Township 2 South Range 3 West In the final EIS Table 3-19 has been revised accordingly.
44	143-B	LU-1	General comment	pg 3-44 Table 3-19 For serial number AZAR 486101, designated is missing its final "d".	Thank you for your comment. In the final EIS Table 3-19 has been revised accordingly.
45	143-B	LU-1	General comment	pg 3-45 Section 3.7.4.1 First paragraph, second sentence. Rewrite to "The Jojoba 500-kilovolt (kV) Switchyard, operated and maintained by Salt River Project (SRP), is located north of the Komatke Road alignment on …"	Thank you for your comment. In the final EIS Section 3.7.4.1 has been revised accordingly.
46	143-B	LU-1	General comment	pg 3-45 Section 3.7.4.1 Second paragraph, Arizona Public Service does not need to be spelled out here; also, under number 5, the "the" before two should be deleted.	Thank you for your comment. The reference to the Arizona Public Service has been replaced by a reference to the Salt River Project (SRP) in paragraph one of Section 3.7.4.1 of the final EIS. For this reason Arizona Public Service (APS) remains spelled out in paragraph two. The word "the" before "two" in reference to "…the two 69-kV transmission lines owned by APS" has been deleted.
47	143-B	LU-1	General comment	pg 3-45 Table 3-20 This applies throughout the document: There is inconsistency between the use of a dash between the voltage figure and the kV designation. They either all need it or all not have it.	Thank you for your comment. The appropriateness of a dash between the voltage figure and the kV designations depends on the context. For this reason in some cases there is a voltage figure and a kV designation with a dash (e.g., "500-kV transmission line") and in other cases no dash will be used (e.g., "transmission line that is 500 kV"). Where specific inappropriate use of a dash was indentified corrections have been made in the final EIS.
48	143-B	LU-1	General comment	pg 3-46 Section 3.7.4.2 First full paragraph, fourth sentence. Rewrite to say "Several primitive roads provide access from Komatke …"	Thank you for your comment. In the final EIS Section 3.7.4.2 has been revised accordingly.
49	143-B	LU-1	General comment	pg 3-46 Section 3.7.4.2 First full paragraph, sixth sentence. Spell out OHV the first time.	Thank you for your comment. This change was not made because OHV is spelled out in the fourth paragraph of Section 3.7.4 of the draft EIS. There is no need to spell it out again within the same section.
50	143-B	LU-1	General comment	pg 3-46 Section 3.7.4.2 First full paragraph, eighth sentence. There is an extra period between the sentence and the reference to the BLM.	Thank you for your comment. In the final EIS Section 3.7.4.2 has been revised accordingly.
51	143-B	LU-1	General comment	pg 3-46 Section 3.7.4.2 First full paragraph, ninth sentence. There is an extra space between roads and totaling.	Thank you for your comment. In the final EIS Section 3.7.4.2 has been revised accordingly.
52	143-B	LU-1	General comment	pg 3-46 Section 3.7.4.2 First full paragraph, ninth sentence. There is an extra period at the end of the sentence.	Thank you for your comment. In the final EIS Section 3.7.4.2 has been revised accordingly.
120	143-B	LU-1	General comment	pg 4-70 Section 4.7.1 Fourth sentence. Remove commas after Area and energy	Thank you for your comment. In the final EIS Section 4.7.1 has been revised accordingly.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
121	143-B	LU-1	General comment	pg 4-70 Section 4.7.1 Last sentence. It states that impacts are discussed in terms of existing land use. What about future land use? Not cumulative impacts, but specific plans for the area.	Thank you for your comment. In the final EIS Section 4.7.1 has been revised to reflect that impacts to land uses in the area of analysis also consider the degree to which the SSEP would affect proposed future land uses in the area. These impacts are already described in the draft EIS.
122	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 Reword second paragraph so that it does not state that a secondary access road would be built from the east. This is misleading. We will not be constructing an all-weather access road from the east at this point in time. The primary access will be from SR 85.	Thank you for your comment. In the final EIS Section 4.7.3 has been revised to remove discussion related to a secondary access road from Riggs Road in the east.
123	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 The statement "The SSEP would primarily be accessed from SR 85 via Komatke Rd." is incorrect. The SSEP would be primarily accessed from SR 85 via a newly constructed access road.	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
124	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 First paragraph, last sentence. Insert "potentially" after "would".	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
125	143-B	LU-1	General comment	4-70 Section 4.7.3 Second paragraph, third sentence. Replace "utilize" with "use".	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
126	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 Second paragraph, last sentence. Rewrite to say "… it would have minimal effects to land use and access."	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly; the secondary access sentence was removed as it is no longer part of the Proposed Action.
127	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 Third paragraph, penultimate sentence. Reference Sonoran Desert National Monument rather than "national monument"	Thank you for your comment. In the final EIS Section 4.7.3, the reference to "national monument" is now a reference to Sonoran Desert National Monument.
128	143-B	LU-1	General comment	pg 4-70 Section 4.7.3 Third paragraph, last sentence. Begin sentence with "Other" and remove "Although".	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
129	143-B	LU-1	General comment	pg 4-71 Section 4.7.3 First paragraph on page, first sentence. Insert "the" in front of "BLM".	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
130	143-B	LU-1	Compatibility with Other Existing Uses	pg 4-71 Section 4.7.3 First paragraph on page, last sentence. It is stated that there would be "no" impacts to utility corridors and other existing ROWs. This seems inconsistent based on other conclusions that have been stated elsewhere, where impacts to road ROWs and mining rights are clearly stated being impacted. These impacts to not rise to any appreciable significance level, but there are impacts.	Thank you for your comment. In the final EIS Section 4.7.3 has been revised to read: "Because the SSEP ROW must conform to the terms and conditions of previously issued ROWs in the Project Area, there would be no direct impacts to these rights." Potential impacts to access and other future proposed land uses are descr bed in Section 4.20.4.6, Cumulative Impacts. "
131	143-B	LU-1	General comment	pg 4-71 Section 4.7.3 Second paragraph on page, first sentence. Remove the word "with" after "overlap".	Thank you for your comment. In the final EIS Section 4.7.3 has been revised accordingly.
132	143-B	LU-1	Compatibility with Other Existing Uses	pg 4-71 Section 4.7.3 Table 4.40 This table states that there will be an adverse impact to residential land uses within 0.6 miles of the Project Area due to noise. However, in the referenced Section 4.12, noise is just one of the facets of an industrial development potentially causing "slight reductions in (property) value" for houses located less than 0.6 miles from such a development. The others in 4.12 include traffic, congestion, obstruction of views, and decreases in property values [redundant]. However, these other factors are not mentioned in Table 4.40. Further, Section 4.12 states that there are six private parcels with residential structures so located within 0.6 miles of the SSEP site, yet this important qualifier is not included in Table 4.40.	Thank you for your comment. In the final EIS, Table 4.49 in Section 4.7.3 has been revised to indicate adverse impacts to the local residents and visitors to the area who are seeking a rural residential community or a semiprimitive view or recreation experience. The SSEP would not preclude or modify residential land uses because no component of the project footprint would eliminate or curtail this use in the area. Potential impacts to adjacent residential areas are discussed in the socioeconomics sections of the final EIS (Section 3.12 and 4.12)

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
133	143-B	LU-1	General comment	pg 4-71 4 Table 4.40 Why are impacts from noise discussed here?	Thank you for your comment. In the final EIS, Table 4.49 in Section 4.7.3 has been revised to indicate adverse impacts to the local residents and visitors to the area who are seeking a rural residential community or a semiprimitive view or recreation experience. The SSEP would not preclude or modify residential land uses because no component of the project footprint would eliminate or curtail this use in the area. Potential impacts to adjacent residential areas are discussed in the socioeconomics sections of the final EIS (Section 3.12 and 4.12). The reference to noise in Table 4.49 has been deleted in the final EIS. Potential noise impacts to residences are discussed in Section 4.9 of the draft EIS.
134	143-B	LU-1	General comment	pg 4-71 Table 4-40 For Grazing, there is an extra space between "to" and "forage".	Thank you for your comment. In the final EIS Table 4.49 has been revised accordingly.
135	143-B	LU-1	General comment	pg 4-71 Table 4-40 For Residential, the impacts listed are noise impacts, not land use. Land use impacts to residences are only direct, not indirect.	Thank you for your comment. In the final EIS, Table 4.49 in Section 4.7.3 has been revised to indicate adverse impacts to the local residents and visitors to the area who are seeking a rural residential community or a semiprimitive view or recreation experience. The SSEP would not preclude or modify residential land uses because no component of the project footprint would eliminate or curtail this use in the area. Potential impacts to adjacent residential areas are discussed in the socioeconomics sections of the final EIS (Section 3.12 and 4.12). The reference to noise in Table 4.49 has been deleted in the final EIS. Potential noise impacts to residences are discussed in Section 4.9 of the draft EIS.
136	143-B	LU-1	General comment	pg 4-71 Section 4.7.3.1 First paragraph, first sentence. Change Arizona Corporation Commission into "ACC" as it has already been used as an acronym earlier in the document.	Because the abbreviation ACC is already being used for air-cooled condenser, we have spelled out all occurances of Arizona Corporation Commission.
137	143-B	LU-1	General comment	pg 4-72 Table 4-41 Under Town of Buckeye General Plan, land use is stated to be consistent, although the area is zoned as residential. Unsure if this discussion is appropriate given that BLM claims jurisdiction over the land.	Thank you for your comment. The BLM has jurisdiction over the SSEP Project Area. The Buckeye Zoning Map lists the Project Area as 'rural residential.' Table 4.50 of the final EIS has been revised. The consistency determination for the Town of Buckeye General Plan now reads, "Consistent because it encourages the use of renewable resources; inconsistent because the Project Area is zoned by the Town of Buckeye as 'rural residential'. However, the land in question is federally owned and managed by the BLM. Therefore, Buckeye's 'rural residential' zoning classification is not applicable to this area."
138	143-B	LU-1	General comment	pg 4-72 Section 4.7.5 First sentence. It states that impacts under Alternative B would be the same as the proposed action. This leading sentence is unclear since the remainder of the paragraph discusses difference in impacts. Suggest removing or rewording	Thank you for your comment. In the final EIS Section 4.7.6 has been revised to indicate that impacts under Alternative B and the Proposed Action would of the same nature as those descr bed under the Proposed Action. The difference would be Alternative B's impacts would occur to a lesser extent due to the reduced footprint of this alternative.
139	143-B	LU-1	General comment	pg 4-73 Section 4.7.6 First sentence. There should be a space between "B" and "on".	Thank you for your comment. In the final EIS Section 4.7.7 has been revised accordingly.
140	143-B	LU-1	General comment	pg 4-73 Section 4.7.10 Whole paragraph. This sentence may need to be rewritten, it does not seem to be completely accurate. These areas could potentially return to their previous use following project decommissioning, so the impacts are not "irretrievable."	Thank you for your comment. Section 4.7.10 of the draft EIS is accurate as written. By NEPA definition an irretrievable impact is a resource impact that occurs during the time frame of project implementation but where the integrity of those resource values and uses would be restored following project decommissioning.
295	143-B	LU-1	General comment	pg 4-201 Section 4.20.4.6.1 First paragraph, third sentence. Add comma after "grazing".	Thank you for your comment. In the final EIS Section 4.20.4.6.1 has been revised accordingly.
296	143-B	LU-1	General comment	pg 4-201 Section 4.20.4.6. First paragraph, penultimate sentence. Rewrite to say "Recreation use consists mostly …"	Thank you for your comment. In the final EIS Section 4.20.4.6.1 has been revised accordingly.
297	143-B	LU-1	General comment	pg 4-201 Section 4.20.4.7.1 First paragraph, first sentence. The word "describe" should be "described".	Thank you for your comment. In the final EIS Section 4.20.4.7.1 has been revised accordingly.
55	150-O	LU-1	General comment	From Attachment A, scoping letter: As stated above, we believe that solar and energy development in the Sonoran Desert should be steered away from unique and sensitive areas, from the region's undeveloped core, and from lands that are not adjacent to transmission and other needed infrastructure.	Thank you for your comment.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
58	150-O	LU-1	General comment	From Attachment A, scoping letter: The site does have high value solar resources and is close to major infrastructure and other developments, as well as existing transmission.	Thank you for your comment.
71	150-O	LU-1	Compatibility with Other Existing Uses	From Attachment A, scoping letter: There are a number of regional or local land-use planning efforts that may impact or be impacted by the Sonoran Solar Energy project. The proposed location for the Sonoran Solar facility is in close proximity to several protected areas, including the Sonoran Desert National Monument and the North Maricopa Wilderness Area. There is a pipeline corridor as well as transmission lines along the northern boundary of the monument as well as a nearby cement plant. Nonetheless, this project is a significant departure from the landuse in the area, primarily due to its scale. The impacts of significantly industrializing this area should be evaluated in the DEIS.	Thank you for your comment. The impacts of industrializing this area are discussed in the draft EIS in Chapter 4.
72	150-O	LU-1	Compatibility with Other Existing Uses	From Attachment A, scoping letter: The project is located within the interface between the Maricopa Association of Government's adopted Hassayampa regional transportation plan and the Hidden Valley plan, which is scheduled to be acted on by the Association's Regional Council soon. That plan proposed a number of new highways and roads that would traverse land in close proximity to the project site. The EIS must fully analyze the impact of this project in the context of these other ongoing planning efforts.	Thank you for your comment. Chapter 4 of the draft EIS discusses the impact of the SSEP in the context of ongoing planning efforts, particularly in Section 4.20.4.6, Cumulative Impacts. The final EIS has been revised to include the conceptual I-8/I-10 Hidden Valley Framework Study (Hassayampa Freeway) in Section 4.20.4.6.
73	150-O	LU-1	Compatibility with Other Existing Uses	From Attachment A, scoping letter: The project site is located within BLM lands that have been annexed by the Town of Buckeye and, while the limits of their jurisdiction may be in question, recent interactions with city staff and elected official suggest they have a very strong interest in preserving the open space character of the general Buckeye Hills area. Finally, the project is located near one or more wildlife linkages identified by Arizona Game and Fish Department and the Arizona Department of Transportation. The EIS must fully analyze the impact of this project in the context of these other ongoing planning efforts.	Thank you for your comment. Land Use and Access and Wildlife and Special Status Species related impacts of the SSEP are disclosed in the draft EIS in Sections 4.7 and 4.19, respectively. Cumulative Wildlife and Special Status Species related impacts are disclosed in the draft EIS in Section 4.20.4.18. The final EIS has been revised in Section 4.20.4.6 to include the Buckeye Parks, Trails and Open Space Master Plan.
98	150-O	LU-1	General comment	From Attachment A, scoping letter, Attachment A - Criteria for use in identifying appropriate areas for development: Areas to Prioritize for Siting include: Lands that have been disturbed due to human activities (e.g., mining, grazing, and off-road vehicle use); Lands of comparatively low resource value, including those located adjacent to degraded and impacted private or state trust lands; Brownfields, including idle or underutilized industrialized sites; Lands located within the Arizona Game and Fish "low known conflict" areas; Locations adjacent to urbanized areas, as long as these do not comprise tourism- or recreation-based economies; Lands identified for disposal by the U.S. Bureau of Land Management; Lands adjacent to federally designated energy corridors with existing major transmission lines; Locations that minimize the need to build new roads; Locations that could be served by existing substations; Areas proximate to sources of municipal wastewater for use in cleaning; Locations proximate to load centers; and Areas that have been identified through broad and transparent multi-stakeholders processes that include engagement of non-utility stakeholders. Areas to Avoid for Siting include: Wilderness Areas; Wilderness Study Areas; Lands identified by the BLM has having "wilderness characteristics"; National Monuments; National Conservation Areas; Other lands within the BLM's National Landscape Conservation System, including Outstanding Natural Areas; National Historic and National Scenic Trails; Wild, Scenic, and Recreational Rivers; study rivers and segments, and eligible rivers and segments; Areas of Critical Environmental Concern; National or state parks; critical habitat designated under the Endangered Species Act; State trust lands classified for conservation purposes under the Arizona Preserve Initiative; Lands identified by state and local governments as conservation acquisition priorities; Land identified for conservation included in pending legislation or ballot initiatives; and Special Recreation Management Areas (SRMA).	Thank you for your comment.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	142-I	LU-3	Access	Land Use and Access, page 4-70. The SSEP would result in closure of 7.4 miles of primitive roads across the Project Area. The DEIS also states that "closure of some existing roads would reduce motorized and non-motorized access to adjacent public lands (including the national monument." However, on page 4-127, the DEIS states that "...access to adjacent public lands would continue via other public lands and routes around the Project Area." In my view, it is important that the public be provided clear, consistent, and specific information regarding access to public lands adjacent to the Project Area, including access to the Sonoran Desert National Monument (SDNM). Recommend the DEIS provide clarification on routes available to the public that would mitigate the access lost by closure of primitive roads in the Project Area. For example, the DEIS should clarify whether visitors can access the north boundary of the SDNM via Komatke Road and spur roads. Similarly, to mitigate loss of a major north-south access route to the SDNM (that crosses the Project Area), the DEIS should clarify how residents north and east of the Project Area can access this route as it enters the SDNM (where it eventually connects to Margie's Cove.) Can access be provided by Tuthill Road, Riggs Road, and spur roads? This should be spelled out so that the public is reassured that traditional access to the SDNM and adjacent public lands is not lost due to the SSEP. It will also help reassure the public that BLM will try to protect recreational access to public lands in future solar energy projects.	Thank you for your comment. Revisions have been made in the final EIS (Section 4.7, Land Use and Access) to indicate which access points would be affected and which access points would be unchanged as a result of the SSEP. It has been clarified in the final EIS in Section 4.7.3 that the resultant loss of 7.4 miles of primitive roads would not reduce access to Sonoran Desert National Monument.
2	135-G	MIT-1	General Comment	The Department also recommends defining "Applicant committed" in the DEIS. It is not clear if this refers to Boulevard Associates, LLC or whoever owns/operates the facility. Also, the DEIS needs to clarify what would happen in the event the facility was sold.	Section 2.3.3 has been revised in the final EIS to read: "Applicant-committed environmental protection measures are actions, practices, or design features that are part of the Proposed Action and all action alternatives and that would be implemented by the proponent (Boulevard). Under all action alternatives, Boulevard would implement the applicant-committed environmental protection measures and BMPs in Table 2.2 to minimize adverse impacts of the SSEP to sensitive environmental resources. These would be included as conditions of approval for any ROW approved by BLM, and would be binding in the event that the facility were transferred or operated by another entity."
10	143-B	MIT-1	General Comment	Chapter 4 of the DEIS contains a section in each resource area entitled "Additional Mitigation Measures." Per discussions with BLM prior to the release of the DEIS, Boulevard understood that BLM's intention was to present these mitigation measures as a suite of options for the BLM decision maker. The decision maker could then choose to implement appropriate mitigation measures if and when a Record of Decision (ROD) and subsequent Right of Way grant are issued. As currently written, the DEIS implies that these mitigation measures are already requirements. Boulevard requests that these sections be re-written to make it clear to the reader that the mitigation measures remain suggestions until the BLM formulates an ultimate decision on mitigation requirements during the ROD process. One potential option would be to title these sections "Potential Mitigation Measures."	Your understanding is correct. As written, these are potential mitigation measures identified to address impacts disclosed in the draft EIS. For clarity, these sections have been revised in the final EIS to read "Potential Mitigation Measures." In addition, a section titled, "2.3.4 Potential Mitigation Measures" has been added to Chapter 2 of the final EIS, which clarifies how these measures are considered and how they may be selected for inclusion in the ROD.
85	143-B	MIT-1	General Comment	General The term "additional mitigation measures" implies that there are a core set of mitigation measures earlier in the document. The reader tends to look back to see where they missed the first list of mitigation measures. Applicant committed measures are not mitigation measures and should not be characterized as such. See Section 6.5.1.1 of the NEPA Handbook (H-1790-1).	Thank you for your comment. "Additional Mitigation Measures" has been revised to read "Potential Mitigation Measures." In addition, Section 2.3.3 of the final EIS has been revised to read: "Applicant-committed environmental protection measures are actions, practices, or design features that are part of the Proposed Action and all action alternatives and that would be implemented by the proponent (Boulevard). Under all action alternatives, Boulevard would implement the applicant-committed environmental protection measures and BMPs in Table 2.2 to minimize adverse impacts of the SSEP to sensitive environmental resources. These would be included as conditions of approval for any ROW approved by BLM, and would be binding in the event that the facility were transferred or operated by another entity."
10	150-O	MIT-1	General Comment	Our recommendations focus on strengthening the treatment of mitigation for wildlife impacts in the DEIS; however, it is likely that the treatment of all mitigation measures in the DEIS could benefit from these suggestions.	Thank you for your comment. Please see the responses to other comments on wildlife and other mitigation measures.
14	150-O	MIT-1	General Comment	Further, many of the measures that are included in the DEIS are unclear in defining what would be required of NextEra, what kind of monitoring will be associated with these mitigation measures, how the efficacy of the mitigation would be measured, and what changes would be required if the mitigation measures are found to be inadequate.	A section titled, "2.3.4 Potential Mitigation Measures" has been added to Chapter 2 of the Final EIS, which clarifies how these measures are considered and how they may be selected for inclusion in the ROD. The ROD will summarize the requirements for monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c).
15	150-O	MIT-1	General Comment	Finally, the DEIS does not explain how the mitigation measures described in the document would be translated into terms and conditions in the Record of Decision (ROD) and incorporated in the ROW grant, or how NextEra and the public will receive confirmation that the requirements have been met.	Information on monitoring requirements has been added to Section 2.3.4 of the Final EIS. The ROD will summarize the requirements for monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c).

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
16	150-O	MIT-1	General Comment	The comments in this section are intended to clarify our understanding of the mitigation measures included in the DEIS and recommend specific ways in which BLM should improve its treatment of mitigation in the DEIS. As described below, the best way to address this issue would be to publish a supplement to the DEIS that clarifies and improves the discussion and incorporation of mitigation measures. This supplement should be published prior to publication of the FEIS, and the information and other changes should also be incorporated into the FEIS.	Thank you for your comment. BLM believes that mitigation has been adequately considered, analyzed, and presented in the draft EIS. In addition, we have considered all suggestions for specific mitigation measures and monitoring requirements and triggers. As such, no supplement to the draft EIS is needed. However, in the final EIS the BLM has clarified and improved the discussion regarding incorporation of mitigation measures. See Section 2.3.4 in the final EIS.
17	150-O	MIT-1	General Comment	Based on a detailed review of the wildlife impacts and mitigation sections of the DEIS, as well as personal communication with BLM and SWCA (the contractor preparing the EIS for BLM) at the BLM public meeting for SSEP in Gila Bend, AZ, we understand that the wildlife mitigation measures in the DEIS are broken down as follows: • To find the mitigation measures in section 2.3.1 on p. 2-2, a reader of the DEIS is required to find a copy of the Lower Gila South Resource Management Plan (BLM 1985), as amended (BLM 2005a, 2009a), find the "applicable BMPs and management stipulations" therein and know which BMPs and management stipulations in that document will apply to this ROW application; • Mitigation measures in Table 2.1 (p. 2-2) are "Applicant Committed Environmental Protection Measures", and would be implemented for all action alternatives; • Mitigation measures in the body of section 4.19 - 4.19.4 (p. 4-175 to 4-189) are required by law, must be implemented, and are beyond BLM's discretion; and • Mitigation measures in section 4.19.5 are additional mitigation measures that BLM could choose to require as terms and conditions in the ROD and ROW grant. Spreading these mitigation measures out across several sections of a nearly 600 page document makes them difficult to find, and not explicitly stating the difference between the various categories of mitigation measures included makes it very difficult to understand what is actually being contemplated.	Thank you for your comment. Section 2.3 has been updated in the final EIS to clarify the various measures considered in the EIS that would have a mitigative effect on potential project impacts to wildlife and other resources. In particular, specific stipulations from the Lower Gila South RMP and its amendments have been incorporated into Section 2.3.3 of the final EIS. Management practices required by law are now referred to as Laws, Ordinances, Regulations, and Standards (LORS), and the consideration of potential mitigation has been clarified in Section 2.3.4 of the final EIS.
18	150-O	MIT-1	General Comment	BLM should publish a supplement to the DEIS that clearly identifies the categories of mitigation measures and what they mean, and the information should be presented in a way that is easy to find and understand. This information should also be included in an improved format in the FEIS. One example of potential improvements to the formatting for presentation of mitigation measures can be found in the DEIS for the proposed Chevron Lucerne solar project in California.5 The Chevron Lucerne DEIS numbers impacts and mitigation measures for reference, and directly ties mitigation measures to impacts. For example, for Effect BIO-5: Introduction of the Invasive Argentine Ant, the DEIS states "…Implementation of MM BIO-8 would immediately detect the introduction and ensure the prevention of this invasive species…" see: http://www.blm.gov/ca/st/en/fo/barstow/chevron_energy_solutions.html	Thank you for your comment. BLM believes that mitigation has been adequately considered, analyzed, and presented in the draft EIS. As explained in Section 4.1.1.1 Mitigation and Residual Effects of the draft EIS, the mitigation measures in Chapter 4 are proposed mitigation that could be implemented to address impacts identified in Chapter 4. Therefore, they are placed at the end of the chapter to track logically from disclosure of impacts to the resulting potential mitigation. In addition, as explained in Section 4.1.1.1 of the draft EIS, the residual effects sections disclose impacts that cannot be mitigated, and as such disclose the effectiveness of the proposed mitigation. In addition, BLM has considered all suggestions for specific mitigation measures and monitoring requirements and triggers. As such, no supplement to the draft EIS is needed. However, in the final EIS the BLM has clarified and improved the discussion and incorporation of mitigation measures. See Section 2.3.4 in the final EIS.
19	150-O	MIT-1	General Comment	BLM should increase the certainty in what, where, when, and how mitigation measures will be carried out and how they will be monitored. Mitigation is only effective if it is applied in a manner consistent with the needs of whatever particular impact is being mitigated. While some flex bility in mitigation measures is necessary to allow for modifications based on monitoring of impacts, BLM needs to include much more certainty and details in the mitigation measures than are currently included in the DEIS.	Thank you for your comment. Information on monitoring requirements has been added in Section 2.3.4 of the final EIS. The ROD will summarize the requirements for monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c).
22	150-O	MIT-1	General Comment	For some mitigation measures, the DEIS does include detailed descriptions that are much more helpful in providing certainty as to what is required of NextEra. For example: In order to accommodate wildlife movement across the main SSEP access road and to reduce the risk of wildlife mortality from vehicle strikes, culverts would be installed under the roadway. Road kill would be monitored to determine the success of the culverts. If road kill is determined to be inadequate by the authorized officer, fencing would be installed along the length of the road corridor to exclude wildlife and better funnel it into the culvert crossings. (p. 4-188, emphasis added) This language is much clearer and more helpful, though it could also be improved by specifying the length of time monitoring would be conducted and the methods to be used for determining what "inadequate" levels of road kill are.	Additional detail on mitigation measures (including monitoring requirements, etc.) has been added in Section 2.3.4 of the Final EIS. The ROD will summarize the requirements for monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c).
24	150-O	MIT-1	General Comment	BLM should add significant detail to the mitigation measures proposed in the DEIS to clearly specify what mitigation is required, how it will be implemented and monitored, what standards will be used to determine its efficacy, and what measures will be taken if monitoring determines that the measures are inadequate. This information should be included in the supplement to the DEIS recommended in section IV a. of these comments, as well as in the FEIS. [reference to attached doc, Jack Morrow Hillls Coordinated Activity Plan, Appendix 17, as example of specificity needed, particularly tables A17-1 through 3, figure A17-3, and the discussion of the JMH CAP, page 20-21.	Thank you for your comment. Additional details on mitigation measures (including monitoring requirements, etc.) have been added in Section 2.3.4 of the final EIS. The ROD will summarize the requirements of monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c).

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
86	150-O	MIT-1	General Comment	From Attachment A, scoping letter: Development of utility-scale solar power generation facilities will transform the lands upon which they are located and preclude most other uses. As noted by the BLM, other uses of these sites "are unlikely due to the intensive use of the site for PV [photovoltaic] or CSP [concentrating solar power] facility equipment," Instruction Memorandum (IM) No. 2007-097. The BLM is obligated to manage the public lands to protect their varied natural resources…. In the body of these comments, we are focusing on additional mitigation measures necessary for solar development [in form of comprehensive mitigation program including both mitigation of impacts to individual resources and value, as well as mitigation for the loss of availability for multiple-use on public lands].	Thank you for your comment.
87	150-O	MIT-1	General Comment	From Attachment A, scoping letter: Existing policy and regulations require mitigation for impacts to certain individual resources and values. For example, mitigation is required for impacts to species protected under the Endangered Species Act. See, e.g., 16 U.S.C. § 1536(a)(1). Endangered species recovery plans can help provide guidance on appropriate mitigation measures. Similarly, impacts to cultural resources require mitigation under the National Historic Preservation Act. See, e.g., 36 C.F.R. §§ 800.1(a), 800.2(a)(4). Additional regulations may require specific mitigation measures to other individual resources and values. Recommendations: The BLM must comply with all regulations requiring mitigation of impacts from solar energy development on individual resources and values.	Additional detail on mitigation measures (including monitoring requirements, etc.) has been added in Section 2.3.4 of the Final EIS. The ROD will specify the requirements of monitoring, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c). As noted in Section 1.6 (Relationship to Policies Plans and Programs) and Section 1.6.4 (Permits Required or Potentially Required) of the draft EIS, the project must comply with laws, statues, regulations, and executive orders, and the proponent must acquire applicable federal, state, county, and local permits and approvals. This compliance and permitting may include required mitigation.
88	150-O	MIT-1	General Comment	From Attachment A, scoping letter: Unl ke many activities on public lands which allow for multiple uses, solar development is a single use of the land which prescr bes any other activities or uses. For this reason, it is critical that the BLM mitigate for the effective loss of any lands approved for solar development from the public domain.	Thank you for your comment. The draft EIS includes Applicant-committed Environmental Protection Measures in Section 2.3.3, as well as potential mitigation measures for applicable individual resources, as described in Section 2.3.4 of the final EIS.
101	150-O	MIT-1	General Comment	From Attachment A, scoping letter, Attachment B - BLM's Mitigation Requirements: Mitigation measures must be mandatory. The EIS should include language requiring that the mitigation measures and other applicable measures be included in the grant of rights-of-way or other permits for the project.	Thank you for your comment. This EIS is being developed as a decision-making tool for the BLM. Mitigation measures have been included in the draft EIS, per NEPA requirements (40 C.F.R. 1502.16[h]). To clarify how design features and required LORSs with a mitigative effect are considered differently in the EIS than proposed mitigation, Section 2.3 of the final EIS has been revised to better explain where they are found in the document, how they are considered in the analysis, and how they would be incorporated into a decision. In addition, a section titled, "2.3.4 Potential Mitigation Measures" has been added to Chapter 2 of the final EIS, which clarifies how potential mitigation measures are considered and how they may be selected for inclusion in the ROD.
102	150-O	MIT-1	General Comment	From Attachment A, scoping letter, Attachment B - BLM's Mitigation Requirements: Mitigation measures must be based on credible science. Both NEPA and the Data Quality Act require the agencies to use and present information of sufficient scientific quality. The EIS must assess and present the scientific basis for the proposed mitigation measures.	Thank you for your comment.
103	150-O	MIT-1	General Comment	From Attachment A, scoping letter, Attachment B - BLM's Mitigation Requirements: Monitoring and adaptive management approaches must include specific standards and commitments. The EIS should contain and/or require permits for projects to contain specific commitments, including timelines, for preparation and implementation of inventorying and monitoring programs, and standards for when monitoring as part of management is not appropriate. All such programs should also identify the existing condition of resources, standards for when management change will be triggered and the use of a "fallback prescription" where adaptive management is not suitable or funding for necessary monitoring is not sufficient. All data should be identified in terms of its source, location, and time. Furthermore, data, and its application, should be available for independent review and evaluation; it should be formalized and standardized to allow for sophisticated and accurate aggregate understanding of the landscape and the impacts of management practices within the landscape to enhance agency cred bility and accountability. The BLM should disclose not only the results of a given analysis, but the underlying methodology and data management practices used. The focus of data collection should be on the impacts – whether adverse or beneficial – caused by particular activities and not the activity itself. The BLM should limit use of this type of "adaptive management" to appropriate situations (where the risk of failure will not cause harm to sensitive resources).	Thank you for your comment. Additional details on mitigation measures (including monitoring requirements, etc.) have been added in Section 2.3.4 of the final EIS. The ROD will summarize the requirements of monitoring and enforcement, per BLM NEPA Handbook H-1790-1 and 40 CFR 1505.2(c). Section 2.5.5 of the final EIS has been revised to clarify that both a performance and reclamation bond and a Decommissioning and Site Reclamation Plan (DSRP) would be required if the BLM selects an action alternative for a right-of-way grant. The section explains that the DSRP would be included as part of the project's Plan of Development (POD) which must be completed and approved prior to construction.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
104	150-O	MIT-1	General Comment	From Attachment A, scoping letter, Attachment B - BLM's Mitigation Requirements: Adaptive mitigation management framework should be based on best available science and include the following elements: • Ensure adequate baseline prior to starting adaptive management and identify indicators. • Set out a detailed monitoring plan and ensure agency commitment to fund monitoring. • Include defined limits of acceptable change in resource conditions and specify actions to be taken if change reaches or exceeds those limits. • Have a "fallback" plan should monitoring or other aspects of the adaptive management process not be fully carried out.	Thank you for your comment.
7	143-B	MIT-2	Off-site Requirements	General Comment Boulevard is also concerned that the DEIS concludes that off-site mitigation is required to offset all Project emissions during undefined wind events. Not only would the implementation of such measures be difficult or imposs ble to quantify, there is no support for the DEIS assertion that off-site controls would provide a reduction in PM_{10} concentrations within the non-attainment area. To provide a conservative assessment of potential impact from the operational phase sources, screening level modeling results for the larger Project sources were addressed in the DEIS. These results show the Project would contribute a small fraction of the PM_{10} NAAQS, typically less than 1 %, even in areas close to the Project site boundary. However, the DEIS places these small impacts in the context of monitored PM_{10} concentrations in distant, developed areas, and concludes the Project would "cause or contribute to" the magnitude and frequency of NMOS exceedances. There is no scientific support for this logic. As a category, the regulatory treatment of minor emission sources is based on the presumption that they do not individually cause NMQS exceedances.	Section 4.2.10 has been revised to incorporate the option for mitigation during all NAAQS exceedances, not just those triggered by high winds. As such, the first mitigation option has been revised to read "Cease construction activities during periods of NAAQS exceedances, which could include high wind events and inversions." In addition, because the emissions inventory indicates that the project emissions would be considered de minimus, the off-site mitigation option for the operational phase has been removed from the final EIS.
26	150-O	MIT-2	Off-site Requirements	As described in detail in Attachment A [scoping comments], utility-scale solar development has significant impacts on project sites, and off-site mitigation is one tool that should be used to offset impacts from converting intact, multiple-use lands to single-use, industrial energy production. There are numerous options for off-site mitigation, including land and water acquisition and protection, research, and habitat restoration (also described in detail in Attachment A). BLM's Instruction Memorandum No. 2005-069 provides further guidance on opportunities for off-site mitigation for energy ROWs (attached for your reference (Attachment C)).	Thank you for your comment. Several potential off-site mitigation measures were considered in the draft EIS, including replacing a stock tank that would be impacted by the project and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location. The IM referenced has an expiration date of 9/30/2006, and makes it clear that BLM interim policy is off-site compensatory mitigation, which is to be entirely voluntary.
27	150-O	MIT-2	Off-site Requirements	One option for off-site mitigation contemplated on p. 4-215 of the DEIS is the possibility of research to "study the effects of the SSEP and other development on wildlife and use of the corridors. This research would be helpful in defining measures needed to mitigate impacts to wildlife."	Thank you for your comment.
28	150-O	MIT-2	Off-site Requirements	NextEra should commit to further discussions with interested stakeholders to develop additional ideas for off-site mitigation, and BLM should commit to further consideration and analysis of potential off-site mitigation measures.	Thank you for your comment. BLM has considered all specific mitigation proposals from the public and cooperating agencies, as submitted during the NEPA process including scoping and public comments. This consultation and coordination is described in Chapter 5 of both the draft EIS and final EIS.
30	150-O	MIT-2	Off-site Requirements	Further, in discussing posting of a reclamation bond, the DEIS states: "The value of this bond would be determined subject to BLM policy, which is currently in draft form and may be finalized for the final EIS of the SSEP." (p. 2-37). Since the BLM is still finalizing its policy as to vital terms, such as the value of a bond needed to ensure adequate reclamation of the public lands affected by the project, the BLM will need to specifically provide for imposition of such terms as they are determined. A specific term to address potential policy changes will be critical, given the agency's current efforts to determine how its solar energy program will define requirements for bonding, payments, and other protective measures designed to ensure the long-term health of the public lands.	Thank you for your comment. BLM bonding will be determined through applicable BLM policy in the ROD. The decision of the EIS is not how to set BLM policy, but whether to grant a ROW and what the terms and conditions of the ROW would be. Section 2.5.5 of the final EIS has been revised to further explain bonding requirements per BLM's most recent policy guidelines.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
89	150-O	MIT-2	Off-site Requirements	From Attachment A, scoping letter: Onsite mitigation for solar development is extremely important, and all efforts should be made to mitigate impacts onsite. However, since the opportunity for effective mitigation of onsite impacts on many resources and values is limited for solar development, off-site mitigation will also be necessary for all projects. This mitigation should also compensate for the loss of all other resources and values on those lands, including recreation, wildlife migration corridors, scenic vistas, and water resources. Off-site mitigation should address a number of issues, including: a "no net loss" or a "net gain" requirement for resources and values. The BLM should ensure that any loss of resources or values on a solar development site is compensated with new addition and protection of equivalent resources and values off-site. These additions should equal or exceed the value of any resources or values which are lost. Additions could be gained through some combination of mechanisms: • Purchase of additional private lands to be put in the federal estate under conservation management to guarantee the maintenance of the equivalent values and resources lost on the project site, or • Additional conservation designations on existing federal lands which would protect the equivalent resources and values lost on the project site, or • Purchase and retirement of water rights to offset groundwater pumping by the project. Achieving this outcome will require detailed understanding and knowledge of the resources and values present on the project site before development occurs. The BLM should require that any necessary study and analysis of the project site be completed prior to implementing off-site mitigation measures and site development.	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project, and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.
92	150-O	MIT-2	Off-site Requirements	From Attachment A, scoping letter: Off-site mitigation involving land protection should be required to take place in the same ecoregion as the project site. The World Wildlife Fund defines an ecoregion as a "large unit of land or water containing a geographically distinct assemblage of species, natural communities, and environmental conditions." Ecoregional health is critical for maintaining the health of individual ecosystems within the ecoregion. In addition to ensuring that off-site mitigation meets a "no net loss" requirement for resources and values lost on the project site, BLM should require that mitigation take place in the same ecoregion as the project site, to ensure the continued health of the overall ecoregion. In situations where availability of private lands for purchase and addition to the federal estate under conservation protection is limited, additional conservation designations on existing BLM land, as well restoration, research, and other mitigation measures, will be necessary. Off-site mitigation efforts involving water resources should be limited to the affected groundwater basin as defined by the Arizona Department of Water Resources.	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project, and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.
93	150-O	MIT-2	Off-site Requirements	From Attachment A, scoping letter: Because of the extremely limited ability to mitigate impacts from solar development on-site, the BLM should require off-site mitigation for impacts which cannot be mitigated on-site. Off-site mitigation should follow the guidelines described above including a "no net loss" or a "net gain" requirement for resources and values.	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project, and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.
96	150-O	MIT-2	Off-site Requirements	From Attachment A, scoping letter: Because of the extremely limited ability to mitigate impacts from solar development on-site, the BLM should require off-site mitigation for impacts which cannot be mitigated on-site. Off-site mitigation should follow the guidelines described above including off-site mitigation to take place in the same ecoregion (or, if involving water, the same groundwater basin) as the project site.	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.
90	150-O	MIT-3	Funding	From Attachment A, scoping letter: Project developers should be required to make deposits to a mitigation fund based on the amount of land or water used for the project and the fair market value of that land or water. The funds should be required to be spent on the three mechanisms outlined above.	Thank you for your comment.
94	150-O	MIT-3	Funding	From Attachment A, scoping letter: Because of the extremely limited ability to mitigate impacts from solar development on-site, the BLM should require off-site mitigation for impacts which cannot be mitigated on-site. Off-site mitigation should follow the guidelines described above including requirements for project developers to fund mitigation efforts based on the amount and value of the land impacted from development;	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.
91	150-O	MIT-4	Mitigation Oversight	From Attachment A, scoping letter: A centralized body should be established to oversee the funds and maximize the effectiveness of their use. The BLM should establish a centralized body comprised of staff from the BLM, Arizona Game and Fish Department, and Arizona Department of Water Resources to oversee the distribution of funds and maximize the effectiveness of their use. This body should be required to take into consideration recommendations from the public in the distribution of funds.	Thank you for your comment.
95	150-O	MIT-4	Mitigation Oversight	From Attachment A, scoping letter: Because of the extremely limited ability to mitigate impacts from solar development on-site, the BLM should require off-site mitigation for impacts which cannot be mitigated on-site. Off-site mitigation should follow the guidelines described above including a centralized body to oversee the funds and maximize the effectiveness of their use.	Thank you for your comment. Several potential off-site mitigation measures are considered in the draft EIS, including replacing a stock tank that would be impacted by the project and off-site mitigation to reduce particulate matter. In addition, the proponent has committed (as a design feature of the proposal) to relocating burrowing owls to artificial burrows in a suitable location.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	21-I	MS-1	General Support for Proposed Action	The Sonoran Solar Project is the most important energy project to be proposed in Arizona. It will ensure we have clean energy for years to come. It will stop the dirty coal plants and dangerous nuclear plants dead in their tracts. Please do everything you can to ensure this project will continue and meet all scheduled dates. The future of the world may depend on it.	Thank you for your comment.
1	23-I	MS-1	General Support for Proposed Action	I would l ke to voice my support for the Sonoran Solar Energy Project. I have reviewed the location and description of the project and cannot see any reason why it shouldn't be built. Solar energy will be a big plus for our area, and I fully support it.	Thank you for your comment.
1	38-I	MS-1	General Support for Proposed Action	I support the project and believe we should be doing more like it.	Thank you for your comment.
2	80-I	MS-1	General Support for Proposed Action	Don't seek perfection, get this done now!	Thank you for your comment.
1	92-I	MS-1	General Support for Proposed Action	What a great step for Arizona to use cheap available energy and create jobs at the same time.	Thank you for your comment.
1	116-I	MS-1	General Support for Proposed Action	As a Sierra Club member and an Arizona resident, I support the Sonoran Solar Project.	Thank you for your comment.
1	143-B	MS-10	readability of DEIS, graphics needed	The DEIS is a technical document that attempts to explain several complex issues in text format. In many of the resource areas, graphical figures and/or maps may be helpful to the general public in attempting to describe the information presented in the text.	Thank you for your comment. BLM used figures in the draft EIS and final EIS where they are the most helpful to presenting complex issues. Maps have been consolidated in the Maps Section, which follows the Index.
26	143-B	MS-10	readability of DEIS, graphics needed	pg 2-20 Figure 2.8 Replace with updated drainage figure	Thank you for your comment. In the final EIS, Figure 2.9 has been updated.
86	143-B	MS-10	Request for Clarification in Final EIS	Impacts to recreation and special designations are reiterated throughout several sections and this creates the impression that the impacts are more significant that they are.	Thank you for your comment. Direct, indirect, and cumulative impacts to recreation and special designations are anticipated and have been considered separately. BLM has presented the impacts in terms of their context and intensity, and the length of discussion is not indicative of the nature of the impacts.
7	137-T	MS-11	general support for no action	The Tohono O'odham Nation recommends that the BLM select the "no action alternative" and not construct this project next to a National Monument and two wilderness areas.	Thank you for your comment. The BLM will base their decision upon the analyses contained within the final EIS, which include consideration of proximity to Sonoran Desert National Monument and designated Wilderness areas.
1	157-I	MS-11	general support for no action	BLM should choose the No Action Alternative for this project [because] there are plenty of alternative sites for large-scale solar development in Arizona. There are perhaps tens of thousands of acres of previously-disturbed, unused farmland along the I-10 and I-8 corridors that could be secured for solar development. While these opportunities are available BLM should not be industrializing and allowing the destruction of public land.	Thank you for your comment. In the draft EIS, several alternative locations, including BLM-administered land and privately owned land, were considered and discussed in Section 2.9.6. Criteria for consideration included proximity to existing transmission and gas lines, available acreage, zoning classifications, price, and adjacent land owners.
2	157-I	MS-11	general support for no action	BLM should choose the No Action Alternative for this project [because] this project will disrupt the Buckeye Hills-Sonoran Desert National Monument wildlife linkage. These linkages are all the more important for the survival of species in an age of climate change, so all current and potential linkages should be preserved. The potential presence of desert tortoises and Gila monsters should also give BLM the justification to choose the No Action Alternative.	Thank you for your comment. The BLM will base their decision upon the analyses contained within the final EIS, which include consideration of wildlife and modeled wildlife linkages.
3	157-I	MS-11	general support for no action	The potential presence of desert tortoises and Gila monsters should also give BLM the justification to choose the No Action Alternative.	Thank you for your comment. The BLM will base their decision upon the analyses contained within the final EIS, which include consideration of wildlife.
1	6-I	MS-2	General Opposition to Proposed Action	Time is running out and we need to stop this disaster -This is horrible!	Thank you for your comment.
2	122-I	MS-2	General Opposition to Proposed Action	Government at all levels should be reconsidering the use of solar power, especially when it is the primary use of the land. The PEAK power of this solar array will be about 10% of the AVERAGE output of the Palo Verde Nuclear Generating Station. The solar array's average output will be far less than the peak. Both are on comparable sized parcels of land. The Palo Verde station, however, has a tremendous amount of room for expansion (probably limited by the available amount of waste water for cooling).	Thank you for your comment.
2	132-I	MS-2	General Opposition to Proposed Action	I am afraid that the use of wet cooled technology on the new plant will consume water reserves from underground at a staggering rate. We should look for alternatives to try and conserve as much water as possible so we can all continue to enjoy this wonderful resource for as many generations as possible.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	136-G	MS-2	General Opposition to Proposed Action	I support the development of solar energy on public lands as long as that development safeguards Arizona' s precious water resources. In order to ensure that solar energy development is reasonable and appropriate for Arizona' s desert landscapes, the BLM must take into account not only the benefits of solar as a carbon-free energy source, but also its potentially negative impacts on water resources. The water supply impacts ofthe proposed action described in the DEIS arc alarming and cannot be reversed, and they demonstrate that wet-cooling CST projects are l kely to be incompatible with Arizona ' s arid desert environment.	Thank you for your comment.
1	147-I	MS-2	General Opposition to Proposed Action	Protect the desert widlife and our water. Do we need solar power that consumes that one natural resource that can't be replaced? If the water must be used can't it used more effectively.	Thank you for your comment.
8	148-G	MS-2	General Opposition to Proposed Action	We also point out the limited use of wet cooling in similar large scale solar energy projects. Of the 21 solar energy projects within Region 9 that have appeared in the Federal Register recently (as a notice of intent to prepare an Environmental Impact Statement), only four projects continue to propose wet cooling. Of those projects, three are sponsored by a subsidiary of the same corporate entity, FPL Energy, including the Sonoran Solar Energy Project.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.
9	148-G	MS-2	General Opposition to Proposed Action	EPA strongly recommends that BLM not approve the use of wet cooling. Alternative A, which would employ dry cooling, would reduce water use from a maximum of 3,000 acre-feet per year to less than 152 acre-feet per year, and reduce the projects impacts on air quality and birds.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.
1	4-I	MS-3	General Support for Alt A	Arizona's most precious natural resource is water. This plant has other alternatives for using less water for the functioning of the plant than what is initially proposed.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18for water resource-related impacts of this alternative.
10	4-I	MS-3	General Support for Alt A	Solar energy is a great idea but not at the expense of depleting water. There are alternatives available, as per the project's plan, that need to be considered. These alternatives are more expensive for the plant but in the long range picture, are better for protecting Arizona's water resource. The residents in this area are not against the project and support renewable energy but want to make it clear that the alternatives for less water usage and protection of our wells is paramount.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.
1	12-T	MS-3	General Support for Alt A	If an action alternative is to be approved, we support Alternative A: reduced Water use (using a dry cooling technology).	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18for water resource-related impacts of this alternative.
1	19-I	MS-3	General Support for Alt A	I would favor Alternative A, which would reduce the solar output by 9% but would be a dry-cooled facility that would not use ground water, as I understand it,	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.
3	129-G	MS-3	General Support for Alt A	The DEIS examined an alternative in which water consumption would be reduced to only 5% of the amount to be consumed by the proposed action, and this alternative should be given serious consideration.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18for water resource-related impacts of this alternative.
4	144-G	MS-3	General Support for Alt A	Page 2-38, Section 2.6, A1temative A, Reduced Water use: Alternative A (Reduced Water Use) is the most efficient alternative when comparing generated power and water use. Alternative A produces 9% less energy but uses 95% less water than the Proposed Alternative. With the proposed project being located in a desert climate it would be respons ble for the region to recommend Alternative A (reduced water use) for the proposed project.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.
3	148-G	MS-3	General Support for Alt A	EPA strongly supports Alternative A: Reduced Water Use, which would use dry cooling and substantially reduce groundwater extraction.	Thank you for your comment. In response to concern over the project's estimated water use, the BLM has developed an additional alternative that uses photovoltaic technology. Please see Section 2.7 of the final EIS for a description of this alternative. Also see Section 4.18 for water resource-related impacts of this alternative.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
7	148-G	MS-3	General Support for Alt A	Additionally, dry cooling provides environmental benefits beyond water conservation. Dry cooling reduces emissions of particulate matter, both 10 micron (PM 1 0) and 2.5 micon ($PM_{2.5}$), due to the elimination of cooling towers. Alternative A: Reduced Water use reduces annual PMI0 emissions by 51 % (20.7 tons) and $PM_{2.5}$ emissions by 57% (12.7 tons), as noted on page 4-29. Dry cooling requires only 6 acres of cooling ponds rather than 30 acres required for wet cooling. The ponds are a danger to the birds attracted by the water, as noted on page 4-179-180, due to the toxic concentration of salt, selenium and possibly other constituents within the groundwater.	Thank you for your comment. The BLM has developed an additional alternative that uses photovoltaic technology. This alternative, described in the final EIS in Section 2.7, requires less water and smaller evaporative ponds than all other action alternatives..
2	12-T	MS-4	General Support for Alt B	If an action alternative is to be approved, we support Alternative B: reduced footprint.	Thank you for your comment.
1	1-G	MS-5	general Comment/Questions about Project	I have no further comment or input at this time, as your proposed project is well outside the scope of the Prescott National Forest.	Thank you for your comment.
1	15-O	MS-5	general Comment/Questions about Project	Thank you so much! Just what I needed.	Thank you for your comment.
1	27-I	MS-5	general Comment/Questions about Project	Sorry I'll miss the Gila Bend April 27th presentation As I will be out of state then. Really learned a lot at your last presentation here in Gila Bend.	Thank you for your comment.
1	131-G	MS-5	general Comment/Questions about Project	I will get it [comment letter] out by email with hardcopy.	Thank you for your comment.
24	143-B	MS-5	general Comment/Questions about Project	General When using material from the technical reports, please provide citations with title and author.	Thank you for your comment. Citations for technical reports have been added to the final EIS where technical reports are referred to.
2	150-O	MS-5	general Comment/Questions about Project	In particular, we direct your attention to our recommendations on continuing to improve the overall permitting process for renewable energy development (starting on p. 2 of Attachment A). As descr bed therein, we strongly believe that long-term, environmentally responsible success of the Bureau of Land Management's solar energy program depends on developing policy and guidelines that guide projects to the most appropriate locations, thus limiting environmental impacts and reducing obstacles to construction of the most appropriate projects.	Thank you for your comment.
3	150-O	MS-5	general Comment/Questions about Project	Our review of the DEIS revealed several important potential public benefits from the development of SSEP. These potential benefits include: reducing greenhouse gas emissions from electricity generation, helping meet Arizona's Renewable Energy Standard, and creating new jobs and tax revenues.	Thank you for your comment.
1	18-B	MS-6	General Comment, OOS	We are selling the 20 foot Cargo/Shipping Containers if you are in any need of them for storage	Thank you for your comment.
1	26-I	MS-6	General Comment, OOS	[letter in french that appears to be spam request for money/investment opp from ivory coast]	n/a
1	28-I	MS-6	General Comment, OOS	I am a Plant Mechanic at Palo Verde Generating Station and seeking employment with the Solar Project. I live about one mile from the project and live off solar myself. I am a Tool Maker, Machinist and Welder for a living. Could you please call me at 480-747-8963 and for more information you can go to www.alanzonker.com.	Thank you for your comment. Please direct job inquiries to the project proponent.
1	29-B	MS-6	General Comment, OOS	[spam email article regarding polish insurer]	n/a
1	63-I	MS-6	General Comment, OOS	I feel that more and more types of these renewable resources should be used whenever possible. However, I feel that all federal buildings should have solar arrays mounted on them to help lead the way in showing other businesses the way to do away with the use of fossil fuels	Thank you for your comment.
1	65-I	MS-6	General Comment, OOS	I feel that more and more types of these renewable fuel resources should be sought all the time. One way to reduce the amount of grass and other green waste going into landfills is to run the material through a still and make alcohol fuel from it. This does two things. It frees up foodstuffs such as corn and other grains used for food and it creates less material that needs to be dumped in landfills by at least 2/3rds. This saves dumping fees that can be used better somewhere else in the bureau and it reduces the amount of fossil fuels being used. It also saves you at least one third of your fuel bill which amounts to a great saving to everyone.	Thank you for your comment.
2	130-I	MS-6	General Comment, OOS	Also, Is there any chance that my land could be utilized for worker housing or something of this nature.	Thank you for your comment. Section 2.5.3.2 of the draft EIS specifies on-site residential areas will not be provided.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	150-O	MS-6	General Comment, OOS	Clearly, our nation's growing addiction to fossil fuels, coupled with the unprecedented threats brought about by global warming, imperil the integrity of our wildlands as never before. To sustain both our wildlands and our human communities, the undersigned believe the nation must transition away from fossil fuels as quickly as possible. To do this, we must eliminate energy waste, moderate demand through energy efficiency, conservation, and demand-side management practices, and rapidly develop and deploy clean, renewable energy technologies, including at the utility-scale. Renewable energy development is not appropriate everywhere on the public lands, however, and thorough review under the National Environmental Policy Act of 1969 (NEPA) is an essential part of determining which of the many proposed utility-scale projects should be permitted to go forward.	Thank you for your comment.
11	150-O	MS-6	General Comment, OOS	The DEIS does a good job of descr bing the affected environment and the potential impacts from the Proposed Action.	Thank you for your comment.
47	150-O	MS-6	General Comment, OOS	From Attachment A, scoping letter: To sustain both our wild lands and our human communities, we believe the nation must transition away from fossil fuels as quickly as possible.	Thank you for your comment.
1	160-I	MS-6	General Comment, OOS	email regarding automated cleanup of mai box.	n/a
8	161-G	MS-6	General Comment, OOS	We are also disappointed to find out that Wesco's mines on BLM land—both of them—are along the route of the proposed trail. Please place us on your mailing list for all future proposals for mines and gravel pits in Maricopa County and southern Yavapai County.	Thank you for your comment. The location of Wesco's mines is out of the scope of the SSEP EIS analysis. BLM does not maintain a central mailing list for NEPA projects or for gravel and mining operations. Instead, BLM looks at each NEPA project individually to determine what level of mailing/outreach should be conducted. However, your name has been added to the BLM Phoenix District Office's mailing database for queries for future projects.
1	140-G	MS-7	Request for Clarification in Final EIS	Please also note that on the 4th page of the DEIS, it reads at the bottom of the page that comments are accepted through THURSDAY, May 24th 2010.	Thank you for your comment. The final EIS abstract has been revised to reflect the correct date of MONDAY, May 24, 2010.
22	143-B	MS-7	Request for Clarification in Final EIS	pg 1-17 The Grading and Drainage permit says the issuing agency is Town of Buckeye. Buckeye does not have jurisdiction therefore this is incorrect. This should be corrected or removed from the table.	Thank you for your comment. This permit has been removed from the table.
23	143-B	MS-7	Request for Clarification in Final EIS	Project acreage varies throughout the document (i.e., 3,500, 3,600, 3,700, etc.) Please make consistent.	Thank you for your comment. The final EIS has been revised to reflect consistent acreage disclosures.
309	143-B	MS-7	Request for Clarification in Final EIS	pg 5-8 Section 5.6 8 Several team members listed here as employees of EPG are incorrectly assigned. Ie – Bob Mantee – a subconsultant to ERM, who is a subconsultant to ERM. EIS must ensure that readers are not giving a false impression to readers and assigning responsibility inappropriately.	Thank you for your comment. SSEP EIS team members have been verified and correctly identified in the final EIS.
310	143-B	MS-7	Request for Clarification in Final EIS	The reference for 2009e, the Noise Chapter 3, was not prepared by EPG and no mention is made of the actual preparation entity, Alliance Acoustical Consulting. The same goes for the Air Quality report that was prepared by ERM. Yet the cultural and biological tech reports are credited to Boulevard Associates (EPG 2009a and 2009i, respectively). Technical Report documents should be correctly attributed to the proper submitting organization; both in this Reference section and in the main text.	Thank you for your comment. The references in the final EIS have been revised and properly attributed to the correct firm.
13	145-G	MS-7	Request for Clarification in Final EIS	Pg ES-3. Identify Gila and Salt River Meridian , if identifying Sections , Townships and Ranges	Thank you for your comment. The final EIS has been revised to include the Gila and Salt River Meridian when legal locations (Township, Range, and Section) are given.
16	145-G	MS-7	Request for Clarification in Final EIS	Does 100% of the energy generated go to the utility grid directly? Or does part of the energy generated go to the operations of the facility?	Thank you for your comment. The Power Purchase Agreement entity will determine where the power is distributed; however, the draft EIS states in Section 2.5.2.2.3 that roughly 10% of the steam generator output would be used on-site for plant facility operations. Section 2.7.2.1.2 of the final EIS has been updated to discuss on-site power requirements for Sub-alternative A1.
17	145-G	MS-7	Request for Clarification in Final EIS	What is the typical lifespan of the solar array and system? Is it poss ble to recycle some items?	Thank you for your comment. The draft EIS, in Section 2.5.5, discusses termination and reclamation of the project after its 30-year useful life, including reusing and recycling material, where feasible.
1	14-B	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Where can I get a copy of the delineation findings and methods? I could not locate on your web page.	Thank you for your comment. The draft EIS, in Appendix B, includes correspondence from the U.S. Army Corps of Engineers approving the jurisdictional delineation for the SSEP. Interested parties can find the Jurisdictional Determination information on the Corps of Engineers Los Angeles District Regulatory Division website at http://www.spl.usace.army.mil/regulatory/ Additionally, this information is available through a standard Freedom of Information Act request through USACE.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
2	14-B	MS-8	request for copies of Draft EIS/docs/Mailing list addition	I was wondering if a waters of the US jurisdictional determination has been done for the project and if so if a report is available. Delineating ephemeral washes can be a tricky task and I am looking for examples.	Thank you for your comment. The draft EIS, in Appendix B, includes correspondence from the U.S. Army Corps of Engineers approving the jurisdictional delineation for the SSEP. Interested parties can find the Jurisdictional Determination information on the Corps of Engineers Los Angeles District Regulatory Division website at http://www.spl.usace.army.mil/regulatory/ Additionally, this information is available through a standard Freedom of Information Act request through USACE.
1	16-G	MS-8	request for copies of Draft EIS/docs/Mailing list addition	I work for the Environmental Review Office in the Region 9 office of the U.S. E.P.A. We will be reviewing the Sonoran Solar Energy Project when it is released next month. When we commented on your NOI we asked for one hard copy and two cd copies. It turns out that we will need 2 hard copies. (And both cds.) I can tell you that neither Enrique Manzanilla nor Frances Schultz will need any copies, however.	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	17-O	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please add us to the list to receive any notifications or NEPA documents issued for this project	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	20-B	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please add me to the Sonoran Solar Energy Project mailing list,	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	22-B	MS-8	request for copies of Draft EIS/docs/Mailing list addition	How can I get a copy of the Draft EIS, I did not see a download link on your web page.	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	25-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Can I be added to the Sonoran Solar Energy Project mailing list and receive a copy of the EIS?	Thank you for your comment. Your name has been added to the final EIS distribution list.
2	41-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	I'd like to stay informed about this, because I have been a solar partner with APS for a number of years, supporting solar energy use.	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	86-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Would you please put me on the list to receive information on the Sonoran Solar Energy Project.	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	111-B	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please add me to the e-mail list for this project.	Thank you for your comment. Your name has been added to the final EIS distribution list.
9	134-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please send me a full [water resources] report study and the impact this project will have on my well.	Thank you for your comment. The impacts to water resources and specific wells are disclosed in Section 4.18 of the draft EIS, as well as Appendices C–D and F–G.
10	134-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please also send me a full report on the possibility of contamination of my well water.	Thank you for your comment. Impacts to groundwater resources are disclosed in Section 4.18 of the draft EIS, as well as Appendices C–D and F–G. As noted in Table 1.5, this project would require an Individual Aquifer Protection Permit, and no well contamination is anticipated.
4	142-I	MS-8	request for copies of Draft EIS/docs/Mailing list addition	Please keep me on the mailing list for this project.	Thank you for your comment. Your name has been added to the final EIS distribution list.
4	148-G	MS-8	request for copies of Draft EIS/docs/Mailing list addition	When the FEIS is released for public review, please send 2 hardcopies and 2 CDs to the address above (Mail Code: CED-2).	Thank you for your comment. Your name has been added to the final EIS distribution list.
1	FORM LETTER	MS-9	general support of solar	I am happy to hear about a new solar project in Arizona. Solar power is the future.	Thank you for your comment.
1	41-I	MS-9	general support of solar	I have seen solar fields in other states with rows and rows of Solar panels harnessing sunlight and using it for electricity. I had wondered why Arizona with all of the sunshine we receive wasn't doing a project l ke these. I'm pleased to know that there are plans to begin such a large-scale project to harness the sun energy that is so plentiful in Arizona.	Thank you for your comment.
1	61-I	MS-9	general support of solar	I am in agreement with building a Solar Energy Project facility in the state of Arizona. I have felt for many years that this should be the way to operate this type project and am happy to see that it is being considered. I truly hope this materializes in the near future. This seems l ke a perfect place to put such a business. I believe many people will receive benefits from this business and it will be at a lesser amount of money to run. Let's harness our sun's benefits and resources	Thank you for your comment.
1	77-I	MS-9	general support of solar	I strongly support renewable energy -- solar energy projects are especially appropriate in a state such as Arizona and its 300 plus days of sunshine.	Thank you for your comment.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	80-I	MS-9	general support of solar	I strongly support renewable energy -- solar energy projects are especially appropriate in a state such as Arizona and its 300 plus days of sunshine.	Thank you for your comment.
1	123-I	MS-9	general support of solar	It's about time the U.S. got serious in supporting renewable energy! This is an excellent start. With care regarding the local habitat and the environment, I can't think of a better location for capturing the sun's energy. We need to transfer the oil & coal subsidies to alternative energy companies.	Thank you for your comment.
1	129-G	MS-9	general support of solar	The City is a strong proponent of clean, renewable energy and seesthis project as a prime example of how our area can take advantage of Arizona's abundant sunshine to produce clean electric power.	Thank you for your comment.
1	148-G	MS-9	general support of solar	EPA supports increasing development of renewable energy resources in an expeditious and well planned manner. Using renewable energy resources such as solar power can help the nation meet its energy requirements while minimizing the generation of greenhouse gases.	Thank you for your comment.
48	150-O	MS-9	general support of solar	from Attachment A, scoping letter: Our public lands harbor substantial wind, solar, and geothermal resources. Developing some of these resources will be important to creating a sustainable energy economy and combating climate change, and we support such responsible development of renewable energy.	Thank you for your comment.
10	129-G	NOI	Analysis Methodology	The DEIS indicates that the project's projected contr bution to daytime noise levels will be relatively low (5 to 7 dB) and would not exceed existing conditions during nighttime due to minimal noise sources operating at night. These conclusions were based on a noise receptor location (ST-2) at a distance of approximately 4,600 feet from the 12sMW power block. While these noise calculations suggest that noise generated by the project should not be a problem, it should be noted that there is additional residential land between the project and the noise receptor location used in the study and a 5 to 7 dB increase in ambient noise could still be an irritant depending on the noise characteristics and the very low existing ambient noise levels.	The following statement has been added to Section 4.9.3.2 of the final EIS: "There is additional residential land between the Project Area and noise receptor ST-2, and a 5-7 dBA increase in ambient noise could be an irritant on this residential land depending on the noise characteristics given the very low existing ambient noise levels."
57	143-B	NOI	Analysis Methodology	pg 3-56 Section 3.9.5.3 Tech Report results for the long-term monitoring (specifically, the results charts in TR figures 2-4) are not included in the DEIS. The whole of the long-term monitoring is simply boiled down to the 24-hour metrics given in Table 3.23. The entire point of the long-term monitoring was to portray the temporal variations throughout an assumed-typical day and night and these important characteristics of the existing noise environment are completely lost to the DEIS reader because of the omission. These data are important also, when trying to make evaluations concerning future noise levels at similar, nearby receptor areas.	In the final EIS, Section 3.9.5.3 has been revised to include the Long-term Monitoring Summary for locations LT-1, LT-2, and LT-3.
58	143-B	NOI	Analysis Methodology	pg 3-56 Section 3.9.5.x Tech Report section 3.2.4 dealing with Frequency-Band Measurements and Results are not included in the DEIS. The tonal content of the existing noise environment is an important characteristic that should be presented in the DEIS as this would be compared to the after-plant conditions to ensure that no project-related tones are introduced into the surrounding receptors areas.	The Frequency-band Measurements have been added to Section 3.9.5 of the final EIS to clarify the discussion of frequency and tonal content in Section 4.9 of the final EIS.
154	143-B	NOI	Analysis Methodology	pg 4-77 Section 4.9.2 The sound level reported (47.6 dBA) is not the "hourly average noise level", but the 24-hour Leq level at Hayes Road. More importantly, what is the point of reporting any existing sound levels, much less this one in particular? For the No Action case, the existing sound levels will remain the same and reporting one or two or 20 of those sound levels is unnecessary to that point.	The "hourly average noise level" has been changed to "24-hour L_{eq} level" in the final EIS in Section 4.9.2. In addition, all the ambient 24-hour noise-level metrics locations have been added to the discussion of impacts as a result of No Action.
160	143-B	NOI	Analysis Methodology	pg 4-79 Section 4.9.3.1, 19-20 The presentation of 130 dBA at a distance of 100 feet has nothing to do with frequency or length of steam blow operations. (The frequency and length were discussed in the previous sentence). The 130 dBA number is better labeled as amplitude or magnitude, rather than intensity. Of note is that the discussion about steam blows, their 130 dBA amplitude, and the 20-30 dB of reduction from silencers to be used during construction were all part of footnotes in the Tech Report, but were 'elevated' to become part of the main text in the DEIS.	In the final EIS in Section 4.9.3.1 the words "frequency, length, and noise intensity" have been deleted from the referenced sentence. The sentence now reads "Ventings can be as loud as 130 dBA at a distance of 100 feet."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
304	143-B	NOI	Analysis Methodology	pg 4-203 Section 4.20.4.8.1, 4-5 It is reported that the hourly average noise level Leq at Hayes Road was 47.6 Leq. This is incorrect in that the 47.6 dBA is the 24-hour average Leq, (i.e. the energy average sound level over an entire 24-hour period), not a single-hour Leq value. It's unclear why was just the Hayes Road number was specifically used. Why not also report 24-hour Leq at Baseline Road (46.4 dBA) and the 24-hour Leq at SDNM (39.7 dBA)? Regardless of choice of receptor location, a much better way to talk about unchanging noise environments (due to the No Action Alternative) would be to include the LT time history charts and refer to them in this DEIS section.	The final EIS has been revised in Section 3.9.5.3 to include the LT time history charts. The final EIS has also been revised in Section 4.9.2 to include the 24-hour L_{eq} at Baseline Road and Sonoran Desert National Monument. In addition, the hourly average noise level L_{eq} at Hayes road has been replaced by the 24-hour average in the text in Section 4.9.2 of the final EIS.
3	124-I	NOI-1	General Comment	I have concerns about noise issues.	Thank you for your comment. Noise impacts from construction and operation of the SSEP are discussed in Section 4.9 Noise of the draft EIS.
8	143-B	NOI-1	General Comment	Boulevard also has concerns that some of the information pertaining to noise in the DEIS has been interpreted incorrectly. Boulevard conducted background noise measurements and a noise modeling exercise which BLM reviewed prior to the release of the DEIS. However, the DEIS mischaracterizes the noise effects of the Project and, in some cases, presents information that is incorrect (see attached specific comments for noise). Boulevard requests that the noise information presented in Chapters 3 and 4 of the DEIS be reviewed and technical questions be addressed to Boulevard's consultant who conducted the noise studies for the Project.	The noise information presented in Chapters 3 and 4 of the draft EIS has been reviewed and updated in the final EIS based on comments from the public, including Boulevard.
12	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.6 The wording of the line about residents within 0.6 miles of the Project Area makes it seem that there will be noise impacts to those nearby residents. This is not the case. Per sections 1.3 and 4.4 of the Tech Report, there are no significant noise impacts identified for any off-site residents. It appears that what is really meant in ES.6.6 is that there may be land use-related impacts to property values for residences within 0.6 miles, but this would be due to the proximity to an industrial facility (per DEIS 4.12.2.2.3) and not specifically due to noise issues.	Any detectable noise levels that are above the ambient conditions are considered an impact for this analysis as noted in Section 4.14.1 Special Designations Analysis Area and Assumptions of the draft EIS. There would be increases in noise levels above ambient conditions of up to 20 dBA during construction at residential receptor ST-2 and up to 5 dBA at residential receptor LT-1.
13	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.8 "equipment vibration" should be struck as construction and operations activities were shown to NOT increase off-site v bration levels above existing ambient conditions and/or thresholds of detectability [per Tech Report sections 3.3.4 and 3.4.4, resp.]	The wording "equipment vibration" has been deleted from Section ES.6.8 Noise of the final EIS.
14	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.8 The overall statement is so general as to be true…there IS potential to increase noise levels (by some undefined amount) near the SSEP.	Section ES 6.8 has been revised to state that "Construction activities (e.g., vehicle traffic, equipment operation, soil compaction, and venting during site commissioning) as well as operational activities (e.g., vehicle traffic, equipment vibration, operation of power blocks, the transmission line and switchyard) would increase ambient noise levels near the SSEP. Noise levels would increase during construction by approximately 5 to 20 dBA depending on the distance between the Project Area and the noise receptor."
16	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.10 The Noise Tech Report showed that there will be no significant noise impacts to any of the formally classified recreational areas, so the use of "would be impacted" and "due to…noise" in the same sentence is incorrect.	There would be an increase of up to 4.0 dBA at the LT-3 (Sonoran Desert National Monument) receptor and 12.0 dBA at the ST-1 (North Maricopa Mountains Wilderness) receptor during construction, as noted in the final EIS in Section 4.11 Recreation and Wilderness Characteristics, Table 4.58 Ambient, Construction, and Operational Noise Levels at Select Noise Receptors. Any noise levels that are above the ambient conditions are considered an impact for this analysis. However, to clarify how the increase in noise levels would impact users, a sentence has been added in the final EIS in Section 4.9.3.1that states "Any sound level 40 dBA and below gives the subjective impression of quiet". A statement clarifying these analysis assumptions has been added to the final EIS in Section 4.11.1 Analysis Area and Analysis Assumptions.
16	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.10 The Noise Tech Report showed that there will be no significant noise impacts to any of the formally classified recreational areas, so the use of "would be impacted" and "due to…noise" in the same sentence is incorrect.	Any noise levels that are above the ambient conditions are considered an impact for this analysis, as noted in the draft EIS in Section 4.14.1 Special Designations Analysis Area and Assumptions.
17	143-B	NOI-1	General Comment	pg ES-10 Section ES 6.10 Noise, in and of itself, cannot alter portions of the viewshed. Noise is an auditory manifestation, while viewsheds are a characterization of visual aspects of the environment.	Any noise levels that are above the ambient conditions are considered an impact for this analysis, as noted in the draft EIS in Section 4.14.1 Special Designations Analysis Area and Assumptions. The text has been revised in Section ES 6.10 of the final EIS to state that "increases in ambient noise levels from construction" instead of "noise" to clarify that noise cannot alter portions of the viewshed.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
18	143-B	NOI-1	General Comment	pg ES-11 Section ES 6.13 The SDNM is named as a degraded environment, but there are "two wilderness areas" that are unnamed so it is unclear what areas are being discussed as potentially degraded. As discussed in further details below, the DEIS does not prove that any wilderness areas will be degraded by SSEP noise, other than to make a farreaching assertion as if it were fact.	The final EIS has been updated to include the names of the two wilderness areas—North Maricopa and Sierra Estrella—in Section ES 6.13. There would be an increase of up to 4.0 dBA at the LT-3 (Sonoran Desert National Monument) receptor during construction as stated in the DEIS in Section 4.14 Special Designations. Any detectable noise levels that are above the ambient conditions are considered an impact for this analysis, as noted in the DEIS in Section 4.14.1 Special Designations Analysis Area and Assumptions.
19	143-B	NOI-1	General Comment	pg ES-11 Section ES 6.13 There is no evidence from the Tech Report, nor from the DEIS that noise will degrade the primitive recreational settings of any nearby special designation areas. In fact, the Tech Report indicates that SSEP operations noise will probably be inaudible at most/all times of the day and night; even in the closest portions of the SDNM and NMMW. Construction noise may be audible in portions of these two recreational areas, but the Tech Report concluded that construction noise would not pose a significant impact. The wording of ES.6.13 seems to equate audibility with degradation, but does so without establishing such a threshold for significance.	There would be an increase of up to 4 to 5 dBA at the LT-3 (Sonoran Desert National Monument) receptor during construction as stated in Section 4.14 Special Designations of the draft EIS. Any detectable noise levels that are above the ambient conditions are considered an impact for this analysis as noted in Section 4.14.1 Special Designations Analysis Area and Assumptions of the draft EIS.
53	143-B	NOI-1	General Comment	pg 3-48 Section 3.9.2.1.x The Tech Report section on BLM noise standards (under 1.3.1) has been removed from the DEIS.	There are no BLM noise standards. For this reason the BLM noise standards section of the noise tech report was not included in the draft EIS and it will not be added to the final EIS. The pertinent laws, ordinances, regulations, and standards were incorporated into the draft EIS in Section 3.9.2.1.
54	143-B	NOI-1	General Comment	pg 3-49 Section 3.9.2.3.1 The second paragraph formatting does not make it clear that this is verbatim language from the county code…there are no quotation marks or indents (as there were in the Tech Report).	The error has been corrected in the final EIS.
55	143-B	NOI-1	General Comment	pg 3-49 Section 3.9.2.3.1 While the DEIS correctly summarizes the exception of power plant operations from the County of Maricopa, this critical exemption is never mentioned again and is not accounted for in Section 4.9 under Environmental Consequences. Nor is this key exemption ever addressed with respect to impact criteria or significance thresholds.	Section 4.9.1 of the final EIS has been updated with the following statement: "-as described in Section 3.9.2.3.1, the following are exempt from County Ordinance P-23: 1) noise emanating from power plant equipment during normal operations and 2) noise emanating from construction and repair equipment when used in compliance with existing Maricopa County rules and regulations.
56	143-B	NOI-1	General Comment	pg 3-54 Section 3.9.5.1 The last sentence of this paragraph has been removed. The Tech Report (Section 3.2.1) stated "All these conditions were well within appropriate ranges for acceptable outdoor measurements per ANSI S1.13." This is an important technical qualification to the measurement effort and should not have been removed.	The final EIS has been revised to include this sentence in Section 3.9.5.1 Survey Methodology.
152	143-B	NOI-1	General Comment	pg 4-77 Section 4.9.1 1st P This paragraph seems to say that any increase in noise due to SSEP construction or operations would, by definition, result in a "direct impact" on noise-sensitive receptors. This is hardly a realistic and viable definition for noise impacts. If that were the case, then nothing could ever be built anywhere unless its noise contribution was at least 10 dB less than the existing ambient conditions. Such a restrictive impact criterion hasn't been established in the DEIS? Further, the DEIS seems to routinely lump construction and operations noise together and then conclude that both will cause significant impacts; regardless of the impact criteria or the lack thereof.	Section 4.9.1. Analysis Area and Analysis Assumptions of the final EIS has been revised as follows: 1) operation and construction impacts are analyzed separately and; 2) the use of the term "noise-sensitive receptor" has been changed to "noise receptor" where appropriate. Impacts are defined as an increase in noise levels from the ambient environment as noted in the referenced paragraph. No significant impacts were noted. The final EIS has been revised to clarify that the impacts could be "direct" or "indirect".
153	143-B	NOI-1	General Comment	pg 4-77 Section 4.9.1 2nd P Contrary to the above paragraph, this paragraph assumes that all pertinent LORS are complied with for both construction and operations of the SSEP. If the Project is compliant, then no standards have been broken and, by conventional ways of establishing impact criteria, no thresholds have been exceeded. Without an exceedance of conventional impact thresholds, how can there be any noise-related impacts?	Exceedance of LORS is not required for a recognized resource impact to occur. The impact analysis indicates that there would be an increase in noise levels as a result of the project (a noise-related impact) but that these increased noise levels would be within allowable quantities based on LORS. The EIS analysis must disclose this regardless of whether or not standards have been exceeded.
155	143-B	NOI-1	General Comment	pg 4-77 Section 4.9.3.1 The construction noise evaluations were performed by AAC 2009, not by EPG 2009e.	The error has been corrected in the final EIS.
155	143-B	NOI-1	General Comment	pg 4-77 Section 4.9.3.1 The construction noise evaluations were performed by AAC 2009, not by EPG 2009e.	The error has been corrected in the final EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
156	143-B	NOI-1	General Comment	pg 4-78 Section 4.9.3.1 The construction noise evaluations were performed by AAC 2009, not by EPG 2009e.	The error has been corrected in the final EIS.
157	143-B	NOI-1	General Comment	pg 4-78 Section 4.9.3.1 The statement that construction-related noise would be "clearly aud ble" during the busiest periods of activity at each of the receptor locations is incorrect. Table 4.43 does not compare the measured ambient levels to these projected construction noise numbers. For example, construction noise at ST-1 is predicted to be between 34 and 38 dBA, depending on the activity phase. Per DEIS Table 3.24, the existing ambient at ST-1 is 56.3 dBA Leq nighttime and 62.7 dBA Leq daytime (over 15-minute sample periods); primarily due to the steady flow of traffic on SR-85. One will not be able to hear construction noise at ST-1 that is on the order of 30 dB below the existing ambient. Secondly, per the paragraph above DEIS Table 4.42, the construction noise evaluation, for conservatism, neglects several sound attenuation factors that would come into play at all the off-site receptor locations; making the Table 4.43 values, in most cases, substantially lower than reported. In the example of ST-1, there is a very large hillside between the receptor and the SSEP site. This would provide at least another 20 dB of sound reduction for this situation (at total of 50 dB below the existing ambient levels). Thirdly, this hillside (on the other side of SR-85) is actually the local landfill whereon many earth moving vehicles are in use on a daily basis to cover the on-going importation of trash. These are the construction vehicles that would be heard at ST-1, not the ones in use over six miles away at the nearest SSEP power block.	The statement that "Construction-related noise would be clearly audible during the busiest periods of activity at each of the receptor locations" has been changed in the final EIS to read as follows: "Construction-related noise would range between 34 dBA and 54 dBA during the busiest periods of activity at each of the receptor locations". Also, in the final EIS Chapter 4.9 Noise has been revised to include a comparison of the measured ambient levels to the operational and construction noise levels. Explanation regarding the conservatism of the noise evaluation and the attenuation factors of topography, etc., has been added to Section 4.9 of the final EIS.
158	143-B	NOI-1	General Comment	pg 4-79 Section 4.9.3.1 For the proper context and appropriate presentation, the paragraph above DEIS Table 4.42 (discussing the conservative discounting of several sound attenuation factors) should either be moved here or repeated here. Strictly speaking, the levels in Table 4.43 will not be experienced by people outdoors…they will, in fact, experience lower levels due to the real-world inclusion of these additional attenuation factors. This fact may be lost on most readers due to the incomplete presentation.	The final EIS has been revised to include the following note in Table 4.54 Predicted Construction Noise Levels: "These typical noise levels do not account for attenuation from air absorption, ground effects, and shielding from topography or structures."
159	143-B	NOI-1	General Comment	pg 4-79 Section 4.9.3.1 2ndP This paragraph is mostly taken from the Tech Report. However, some important nuances and qualifications have been omitted. The original Tech Report text was (with deleted wording shown in highlighting): "exterior noise levels in the range of 60 to 63 dBA may be experienced at this house for those relatively short periods when these types of machines are working in the closest site areas. As they complete their work, though, they will move to other, more distant parts of the site and their noise contributions will reduce to levels more represented by the spatially-averaged results given in Table NOISE-YYY." Further, the original Tech Report said "may" be experienced, whereas the DEIS used the stronger word "would" be experienced. Again, with the conservative discounting of additional attenuation factors, it may be too strong to state that a given receptor would experience the tabled noise levels because, in reality, they would be much more likely to experience substantially lower levels (due to these neglected attenuation factors). The removal of key distinctions and important considerations, plus the use of stronger language that is not warranted by the technical evaluation is unfairly painting an overly dour picture of the future construction noise situation.	The statement already includes a qualification that states "60 to 63 dBA would be experienced for those periods when construction activities are occurring in that area." The fact that "noise levels would decrease as they complete their work and move to other more distant parts of the site" is implied. The NEPA process is intended to help public officials make decisions that are based on the understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1 c). The terms "could potentially" or "may" are typically avoided in NEPA documents because they are generally too vague to help in decision-making. If the analysis has used reasonable assumptions to discuss impacts then the term "would" is used.
161	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.1 5-Apr Again the word "would" is used, rather than "may", to depict the future noise levels to be experienced during construction. Given the conservative nature of the evaluation, this is an over-statement. Several receptors would, in reality, have noise levels well below the existing ambient, but this is not even provided as a possibility in the DEIS wording. Further, the rest of the sentence does not distinguish between receptor locations, thus implying that all receptors "would" experience construction noise that would be comparable or above the existing ambient. As shown above for ST-1, this is clearly not the case and making such a strong and all encompassing statement is unfairly and incorrectly characterizing the Project relative to construction noise environments.	The text has been revised in Section 4.9.3.1 to clarify that the construction phase of the Proposed Action would result in increased ambient noise levels at some receptor locations. Receptor locations are distinguished in Table 4.54 Predicted Construction Noise Levels (dBA) Compared to Ambient Noise Levels - Proposed Action.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
162	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.1 The statement about bursts of venting noise exceeding 100 dBA within closed residential structures is incorrect. The closest residential receptor to an area needing steam blows is ST-2 at 4,658 feet from the 125 MW block (per DEIS Table 3.22). The noise level from a silenced steam blow venting would be 100 dBA at 100 feet from the outlet. Distance attenuation alone would provide 33 dB of attenuation, with air absorption and ground effects providing at least another 10-15 dB. Even with windows open in a typical house, one could apply a conservative 17 dB reduction for outside-to-inside transmission loss (as discussed on DEIS page 4-79). Thus, the stated steam blow level would conservatively be closer to 35 dBA on the inside of the nearest residence, with open windows (100 – 33 – 15 – 17 = 35), than the erroneously stated 100 dBA. Also, it would be more l kely to be below this estimated level than to exceed this level, given the conservative evaluation methodology, and the use of "exceed" is overly harsh.	This sentence has been deleted from the final EIS and replaced with the following: "The noise level from a silenced steam blow venting would be 100 dBA at 100 feet from the outlet. As a result of 1) distance attenuation, 2) air absorption and ground effects, and 3) noise attenuation related to being indoors, the closest receptor (ST-2) would experience noise levels of approximately 35 dBA indoors."
163	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2 , 2 The operations noise evaluations were performed by AAC 2009, not by EPG 2009e.	The error has been corrected in the final EIS.
164	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2, 3 Again, the use of the strong word "would" in relation to noise level increases over ambient conditions is both unfair and, in some cases, simply incorrect.	The NEPA process is intended to help public officials make decisions that are based on the understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1 c). The term "could potentially" is typically avoided in NEPA documents because it is generally too vague to help in decision-making. If the analysis has used reasonable assumptions to discuss impacts then the term "would" is used.
165	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2, bullets Five bullets are listed as operations actions that would experience noise level increases. However, four of the five are discussed in subsequent text as not experiencing noise level increases or having undetectable v bration levels; a direct contradiction of the sentence just before the bullets. To wit, the first bullet on operations traffic is contradicted by the first paragraph following the bullet list. The second bullet on operations vibration (not a noise impact, by the way) is contradicted by the second paragraph following the bullet list. The transmission line and switchyard bullets are invalidated by the last paragraph in 4.9.3.2.	In the final EIS in Section 4.9.3.2 the sentence prior to the bullets has been changed to read: "The following actions that would occur during operations of the Proposed Action were analyzed:"
166	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2, 4th P Continued use of the (strong) word "would" implies a certainty that is not consistent with the Tech Report that used phrases such as "are predicted to be" or "are expected to be." The most troublesome use of "would" is with respect to expected noise levels at Receptor ST-2. The Tech Report talked about expected levels of 5-7 dB above typical daytime ambient, but added qualifications about additional, real-world attenuation factors that could reasonably be expected to reduce the SSEP contributions to 1-3 dB above typical daytime ambient levels. The Tech Report goes on to conclude that these likely, real-world conditions "may be inaudible to discern ble", but these qualifications and additional discussion from the Tech Report were not included in the DEIS, thus precluding a complete and thorough technical picture.	The NEPA process is intended to help public officials make decisions that are based on the understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1 c). The term "could potentially" is typically avoided in NEPA documents because it is generally too vague to help in decision-making. If the analysis has used reasonable assumptions to discuss impacts then the term "would" is used. The final EIS has been revised in Section 4.9.3.2 to include a statement that attenuation factors could reduce the SSEP's contributions to noise levels to1-3 dBAabove daytime ambient levels depending on environmental conditions such as wind speed and direction.
167	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2, 4th P In addition to the above, the predicted SSEP contr butions being 5-7 dB above typical daytime ambient levels at receptor ST-2 is referenced to DEIS Table 4.44. However, there is no way the reader can make that comparison as Table 4.44 does not contain sufficient information for such an assessment (it only gives the 'after' condition). To make a proper assessment for future noise at ST-2, one would also need to at least refer to Table 3.24, but this was not referenced. Additionally, one would have to also consider the long-term data at similar location LT-1 to properly establish what the "typical daytime ambient" levels are, as data at ST-1 was a single, 15-minute sample during the daytime. (While not explicitly stated in the Tech Report, use was also made of the long-term data at similar location LT-1 to arrive at the typical daytime levels for the general receptor area, including at ST-1.)	A reference to Table 3.24 Ambient Noise Measurements - Summary of Short Term Data has been added to the referenced statement in the final EIS. In addition, the word "typical" has been deleted from this statement in the final EIS. Please note that in the draft EIS operational noise levels are discussed as being below the ambient conditions at all other receptors.
168	143-B	NOI-1	General Comment	pg 4-80 Section 4.9.3.2, 4th P The next to last sentence on this page appears to be worded incorrectly. Rather than "For nighttime operations, noise contributions from the SSEP would not exceed the existing conditions at all receptor analysis locations.", the correct phrasing should be "…from the SSEP are not expected to exceed the existing conditions at any receptor analysis locations."	In the final EIS the wording has been changed as suggested by the commenter.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
169	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.5.1, 8 AAC cannot confirm the distance given (1,630') to ST-2 for this Alternative.	The distance given in the draft EIS was approximate. The calculation was checked again for the final EIS using Geographic Information Systems (GIS) technology and the final EIS has been revised to read "approximately 1,650 feet".
170	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.5.1, 11-13 This last sentence is awkwardly worded and it appear that the 5-7 dB notation is a hold-over from the proposed action operations assessment and not valid for the Alt B construction assessment. Suggested better wording: "The increased distance between noise-sensitive receptors and solar field construction activities can be expected to result in reduced aud ble construction noise at nearby residences, as compared to the Proposed Action construction scenario. These Alt B construction activities may still be audible at receptor locations such as ST-2 during periods of heavy activity, but these construction noise levels will be short-term and will dissipate as the activities move farther away from the residences."	The final EIS has been revised to replace the current wording with the suggested wording except that the word "will" has been replaced by the word "would".
171	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.5.2, 3-5 This statement seems to be missing the fundamental point of SSEP operations noise. That is, the main noise sources during operations are at the two power blocks (with the solar fields being essentially inconsequential unless one is very close to a solar panel actuator). This statement should read something like: "Because operations noise levels are primarily controlled by the power block equipment and not the solar field equipment, changes in the size of the solar field for this Alternative will not change the SSEP noise environment relative to the Proposed Action."	The final EIS has been revised to replace the current wording with the suggested wording except that the word "will" has been replaced by the word "would".
172	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.6.1, 1-3 These sentences are awkwardly worded in that is unclear what is being compared to what regarding future noise conditions. It appears that the Brine Concentrator Alternative is being compared to existing ambient noise levels, but it should be compared to the Proposed Action.	The statements have been revised in the final EIS to clarify that the application of the Brine Concentrator Option would not change the noise-related impacts of the Proposed Action or Alternative B.
173	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.6.2 See comment directly above	The statements have been revised in the final EIS to clarify that the application of the Brine Concentrator Option would not change the noise-related impacts of the Proposed Action or Alternative B.
174	143-B	NOI-1	General Comment	pg 4-82 Section 4.9.7 all The use of the word "additional" indicates that there are other, fundamental Mitigation Measures (discussed elsewhere) that these 4.9.7 mitigation measures would be overlaid onto. However, there are no such fundamental Mitigation Measures discussed elsewhere.	"Additional Mitigation Measures" has been revised to read "Potential Mitigation Measures" in the final EIS. Section 2.3 has been updated in the final EIS to clarify the various measures considered in the analysis that would reduce impacts. In particular, specific stipulations from the Lower Gila South RMP and its amendments have been incorporated into the final EIS. Management practices required by law are now referred to as Laws, Ordinances, Regulations, and Standards (LORS). In addition, a section titled, "2.3.4Potential Mitigation Measures" has been added to Chapter 2 of the final EIS, which clarifies how potential mitigation measures are considered and how they may be selected for inclusion in the ROD.
175	143-B	NOI-1	General Comment	pg 4-83 Section 4.9.9 all See above for comments on the use of the word "would". As also discussed previously, important nuances and qualifications contained in the Tech Report have been omitted in the DEIS, thus providing the DEIS reader with only a partial explanation of future conditions. For one, the closest receptors to the east of the site (and the one most l kely to receive the largest increases over existing ambient levels) are in the Goodyear Planning Area, not within Goodyear city limits. Secondly, not all receptors east of the plant may (not would) experience a 5-7 dB increase, as is implied by the DEIS wording. Thirdly, the Tech Report discusses additional noise propagation characteristics, as well as changing ambient conditions that may likely result in SSEP operations being inaudible throughout most of a typical daytime period; even at the closest residential receptors.	In Section 4.9.11 Short-term Uses versus Long-term productivity, the final EIS has been updated to state "Goodyear Planning Area" rather than "Goodyear." An explanation of noise propagation characteristics has been added to Section 4.9.1 Noise Analysis Area and Analysis Assumptions in the final EIS. In addition, Section 4.9.3 Noise Proposed Action has been revised in the final EIS to show ambient versus construction and operational noise levels at each individual receptor.
176	143-B	NOI-1	General Comment	pg 4-83 Section 4.9.10, 1-2 This statement is at least confusing and does not reflect 'irreversible'. The fact that the plant has a design life and a planned decommissioning time horizon means that SSEP operations noise can be reversed, not because of the stated increased noise levels over the lifetime of the SSEP. More importantly, see all the comments immediately above for 4.9.9.	In Section 4.9.12 Irreversible and Irretrievable Commitments of Resources the final EIS has been updated to differentiate ambient versus construction and operations noise levels at individual receptors. Statements concerning irreversible and irretrievable noise-related impacts have not been modified in the final EIS. In Section 4.9.10 the draft EIS correctly states that there would be "no irreversible impacts on the sound environment of the area" but that there would be "irretrievable impacts associated with the operation of the SSEP."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
177	143-B	NOI-1	General Comment	pg 4-83, all Nowhere in this section are impact criteria or significant thresholds established. Therefore, it is unclear how impacts can be addressed. Further, following section 3.9.2.3.1, there is never mention that normal operations of power plants are specifically EXEMPTED from the County of Maricopa Noise Ordinance. All this section seems to focus on is an increase in daytime contr butions of 5 to 7 dB (note that these numbers were not adequately documented in the DEIS, nor are they put into proper context) with an inferred implication that such potential increases are significant impacts. Nowhere is it stated whether or not these 5-7 dB contr butions are adverse or significant impacts. Subsequent sections rely on this inferred/ implied impact conclusion and even tend to extend it beyond how it is presented in 4.9.	The assessment of impacts is addressed in Section 4.9.1 of the draft EIS: "…the relative impacts of each alternative to noise-sensitive receptors were assessed by comparing changes in ambient noise levels from the construction and operation of the SSEP at noise-sensitive receptors." In the final EIS information has been added to Section 4.9.1 to clarify the general relationships between sound level increases and human perception. Section 4.9.1 of the final EIS has also been updated with the following statement: "-as described in Section 3.9.2.3.1, the following are exempt from County Ordinance P-23: 1) noise emanating from power plant equipment during normal operations and 2) noise emanating from construction and repair equipment when used in compliance with existing Maricopa County rules and regulations."
293	143-B	NOI-1	General Comment	pg 4-193 Section 4.20.2.4 all It is not clear how the author concludes that construction noise "usually dissipates to background levels within 2.8 km or 1.75 miles of the source…" This is not discussed in the DEIS. Secondly, the dissipation of construction noise to background levels, while dependent on topography and vegetation as noted, is much more dependent on the intensity of the construction activities as well as on the variability of the ambient conditions at any given receptor location. The long-term time history charts included in the Tech Report, but not in the DEIS, show daytime variability in noise levels of up to 20 dB at all three LT locations. With the ambient conditions changing that much during the daytime, along with changing construction location and intensity, stating a single number for distance from the construction noise sources as being 'the' distance where those activities dissipate to the background levels is a serious over-simplification. Lastly, the end sentence appears to be contradictory to the above assertions in that 2.8 km is listed as the distance where construction noise dissipates to the background (which should lead to a preponderance of inaudibility), but then a 5 km distance is stated as being "the furthest (sic) boundary from where noise could be heard from the Project Area." Is construction noise inaud ble at 2.8 km or at 5 km?	The final EIS has been revised in Section 4.20.2.4 to support the assertion that construction noise dissipates to background levels within 2.8 km or 1.75 miles of the source and to include the rationale for the size of the Noise CEAA. Text has also been added to the final EIS noting that the distance would vary depending on the intensity of construction activities and the range of ambient conditions. The following sentence has been deleted from this section: "This distance represents the furthest boundary from where noise could be heard from the Project Area" and has been replaced with "The size of the CEAA was chosen to capture other sources of noise that may overlap the dissipation distance noted and to better disclose cumulative impacts."
298	143-B	NOI-1	General Comment	pg 4-202 Section 4.20.4.8 14-15 It is unclear why the author chose to list the highest 24-hour noise level at the end of this paragraph. What is the point that is trying to be made by its mention? Secondly, the reported number (50.0 dBA) is the CNEL 24-hour metric which has not been used to characterize the ambient conditions anywhere else in the DEIS. Up to this point, the 24-hour Leq has been reported and (marginally) discussed (and usually mislabeled as the "hourly Leq")…so why use the CNEL metric now? A more indicative noise metric might be the hourly Leq which ranged from xxx to xxx at LT-1, from xxx to xxx at LT-2, from xxx to xxx at LT-3. A better presentation of the ambient conditions around the site would be to show the long-term time history charts from the Tech Report. Note that the 50.0 dBA statement is also incorrect in that a 15-minute Leq of 62.7 dBA was measured at locations ST-1.	The sentence has been revised in the final EIS to disclose the 24-hour L_{eq} range for the short-term noise receptors and the range of the A-weighted statistical sound levels of L_{10} and L_{90} at the long-term noise receptors rather than the single CNEL 24-hour metric at one noise receptor.
299	143-B	NOI-1	General Comment	pg 4-202 Section 4.20.4.8, 3rdP The text talks about 3700 acres of solar facilities in the 5-km CEAA, but this does not agree with the referenced Table 4.86, which shows 0 acres of solar projects in the 5-km CEAA. Further, the table lists 3,569 acres, which would round up to 3600, not 3700. With such a large CEAA for noise and with such widely dispersed RFA projects, it should be stated that with "more people and traffic (coming into) the area, (which will) result in an increase in noise levels"? Don't potential increased noise levels from the SSEP and the cumulative effects from the RFA's depend on the location of future receptors in relation to the SSEP and the RFA's? There could well be locations that experience no change in noise levels, even with SSEP and the RFA's. The uncertainty of the situation is well expressed in the last sentence that states it is not possible to quantify the increase in dBA for these projects….yet the author made a blanket statement previously that there will be increasing noise levels. If it is not quantifiable or able to be estimated, how can such an authoritative conclusion be reached?	Table 4.86 of the final EIS only includes key ongoing, proposed, and potential actions within each CEAA or the Reasonably Foreseeable Actions (RFAs). The impacts from the Proposed Action are discussed in the other resource sections of Chapter 4. Cumulative impacts consider both the impacts from the Proposed Action and from the RFAs. The sentence "Commercial and residential development along with the growth of master planned communities and construction of freeways and parkways would bring more people and traffic to the area resulting in an increase in noise levels" has been revised in the final EIS to say "Commercial and residential development along with the growth of master planned communities and construction of freeways would bring more people and traffic to the area**, which would result in an increase** in noise levels in ***some areas***." Finally, the text in the referenced section has been revised to read "development of the SSEP" rather than "development of 3,700 acres of solar facilities."
300	143-B	NOI-1	General Comment	pg 4-203 Section 4.20.4.8 5-6 The first sentence is over-reaching on two counts. It has not been shown that construction and operation of the SSEP would contr bute to increased noise levels in the 5-km CEAA. This is simply not the case and not shown by the DEIS analysis or data presentation. Next, the end of this sentence over-reaches in stating the (presumed) increases in the CEAA, especially during construction, would be over the next 30 years. But construction will not last for 30 years, so how can these presumed increases be "especially" due to this 39-month activity? This lumping of construction and operations noise together and concluding that both will cause significant impacts seems to be a common over-statement throughout this DEIS.	The wording has been revised in the final EIS to show the change in noise levels at all receptors within the CEAA. Information has also been added to clarify that the increases in noise levels during construction would last 39 months, not 30 years (lifetime of the project).

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
301	143-B	NOI-1	General Comment	pg 4-203 Section 4.20.4.8 5-6 The DEIS incorrectly states that construction noise increases would range from 33 to 91 dBA at 50 feet. This range of numbers for 50-feet construction noise levels is incorrect. Also, since there are no off-site receptors that are at 50 feet from construction activity, is this statement necessary? The conservatively-estimated construction noise levels are reported in DEIS Table 4.43 (page 4-79). However, these tabled values are for SSEP construction activity noise level contr butions only and DO NOT represent increases over the existing conditions, as is being stated here. This could be indicative of an overall misinterpretation of noise measurement and predictive analysis results contained in the Tech Report.	The final EIS has been revised in this section to clarify that the increases in noise levels would be 20 dBA or less. Information discussing the increases of noise levels at all receptors has also been included in this section of the final EIS.
302	143-B	NOI-1	General Comment	pg 4-203 Section 4.20.4.8 6-7 As directly above, the predicted noise levels for SSEP operations are incorrectly reported as increases of from 0 to 42 dBA. The SSEP operations noise predictions (Project contributions only, without accounting for existing ambient conditions) are summarized in DEIS Table 4.44 (page 4-81). It would appear that the DEIS author took the highest and lowest tabled numbers and reported them here as increases, which they are not.	The final EIS has been corrected to state that the increases in noise levels during SSEP operations would be 7-8 dBA or less.
303	143-B	NOI-1	General Comment	pg 4-203 Section 4.20.4.8 8-10 Again, there is a generalized conclusion that "construction and operation of the SSEP under any of the alternatives would contribute noise to the CEAA over the next 30 years…" This is simply not true for a majority of the CEAA, even under the loudest construction periods (with the entire construction schedule only being 39 months in duration, not 30 years). The author then goes on to add the clause "further reducing the quiet nature of the CEAA." There are some parts of the CEAA that do not currently have a quiet nature to them and there are other parts that will not be able to detect SSEP noise under any reasonable circumstances, so the proposed Project will make no difference whatsoever in these areas. The presumed premise in these statements that all portions of the CEAA have an extremely quiet environment is not true and the presumed premise that SSEP noise contributions will propagate to all portions of the CEAA is also not true.	The final EIS has been revised in this section to note the difference between construction and operations noise, the length of time for each phase, and the range of ambient noise levels throughout the CEAA.
74	150-O	NOI-1	General Comment	from Attachment A, scoping letter: Due to its proximity to the North Maricopa Wilderness Area and the value of natural quiet as a key wilderness value, the impacts of this project on the natural quiet should be thoroughly evaluated and proposals to limit and mitigate noise should be incorporated. Recommendation: The EIS must fully analyze the impact of this project on the value of natural quiet given its proximity to a designated wilderness area.	The impacts from noise to wilderness areas are discussed in Section 4.14 of the draft EIS. Local, state, and federal laws, ordinances, regulations, and standards for noise are outlined in Section 3.9.2 of the draft EIS.
75	150-O	NOI-1	General Comment	From Attachment A, scoping letter: While the solar troughs make little noise, the power plant itself will generate a fair amount of noise from the turbines. The EIS must fully analyze the impact of this project on the value of natural quiet given its proximity to a designated wilderness area.	The impacts from noise to nearby wilderness areas are discussed in the draft EIS in Section 4.14 Special Designations.
6	161-G	NOI-1	General Comment	We are concerned about noise from construction and operation, which apparently will reach Buckeye Hills Regional Park. (4.11.3 Proposed Action)	Noise impacts from construction and operation of the SSEP are discussed in the draft EIS in Section 4.9.
76	150-O	NOI-2	Transportation Noise	From Attachment A, scoping letter: Any additional truck and car traffic and its noise impacts should also be evaluated and minimized. The EIS must fully analyze the impact of this project on the value of natural quiet given its proximity to a designated wilderness area.	Noise impacts from construction and operation of the SSEP are discussed in Section 4.9 Noise of the draft EIS. Noise would be minimized by adhering to the laws, ordinances, regulations, and standards listed in Section 3.9 Noise. Impacts to designated wilderness from noise are analyzed in Section 4.14, Special Designations.
178	143-B	PAL-1	General Comment	pg 4-84 Section 4.10.3 A PFYC rating of 2 suggests that there is very little, but not zero, likelihood of discovering paleontological resources during construction activities within the Project Area. What protocols will be put in place regarding unexpected paleontological resource discoveries? Would fossils be recovered from the site and by whom? Where would any fossils be deposited?	Section 4.10.4, Potential Mitigation Measures, of the final EIS has been modified to state that construction workers responsible for surface-disturbing activities "could be instructed to recognize paleontological resources." This section was also modified to state that "any discoveries would be treated in accordance with federal policy implementing the Paleontological Resources Protection Act of 2009. If paleontological resources are discovered inadvertently during construction or operation, the BLM would require the issuance of a paleontological resource use permit to a qualified paleontologist for the scientific collection and study of any vertebrate fossils or occurrences of noteworthy invertebrate or plant fossils.".
179	143-B	PAL-1	General Comment	pg 4-84 Section 4.10.3 Remove one of the two "impacts"	Section 4.10.3 of the final EIS has been revised to remove the duplicate occurrence of the word impacts.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
43	150-O	PN-1	General Comment	The purpose and need statement in the DEIS includes mention of the broader goals for BLM's solar energy program, including supporting the President's New Energy for America Plan, the American Recovery and Reinvestment Act of 2009, and renewable energy development goals for the public lands set forth in the Energy Policy Act of 2005 (p. 1-5). This is an important improvement on the overly narrow purpose and need statements in other DEISs that have recently been published for proposed solar projects on BLM land in other states. However, to both make clear BLM's goals for its solar program and ensure that the DEIS is legally defensible, we recommend that BLM go further in defining the purpose and need to include mention of the broader goal of "facilitating environmentally respons ble commercial development of solar energy projects" and the poss bility of SSEP helping meet Arizona's RES.	The following statement has been added to Section 1.3.2, Need for the Action: "This Proposed Action or alternatives, if approved, would also further the purpose of Secretarial Order 3285A1 (March 11, 2009) that "establishes the development of environmentally responsible renewable energy as a priority for the Department of the Interior." Information related to helping meet Arizona's Renewable Energy Standard (RES) is already included in Sections 1.1 and 1.2 of the draft EIS.
44	150-O	PN-1	General Comment	BLM should go further in defining the purpose and need for SSEP to include mention of the broader goal of "facilitating environmentally respons ble commercial development of solar energy projects" and the poss bility of SSEP helping meet Arizona RES.	The following statement has been added to Section 1.3.2, Need for the Action: "This Proposed Action or alternatives, if approved, would also further the purpose of Secretarial Order 3285A1 (March 11, 2009) that "establishes the development of environmentally responsible renewable energy as a priority for the Department of the Interior." Information related to helping meet Arizona's Renewable Energy Standard (RES) is already included in Sections 1.1 and 1.2 of the draft EIS.
2	148-G	PRO-1	General Comment	In making its decisions regarding whether or not to grant ROWs for such projects, we recommend BLM consider a full range of reasonable alternatives to minimize the adverse environmental impacts.	As discussed in Section 2.1 of the draft EIS, the BLM is required to analyze a range of alternatives that both meet the purpose and need and minimize or avoid environmental impacts. For unreasonable alternatives or alternatives that do not meet purpose and need, a detailed analysis of these alternatives is not required. These alternatives are descr bed in Section 2.9 of the draft EIS, which provides the rationale for eliminating them from detailed analysis.
35	148-G	PRO-1	General Comment	The DEIS notes that a Conformity Analysis is currently in development but has not been included in the DEIS (page ES-9). If applicable, a Conformity Determination will be necessary to support a record of decision. EPA encourages BLM to coordinate with EPA and the Maricopa County Air Quality Department in advance of issuing the FEIS.	Thank you for your comment. The BLM will ensure that all the necessary coordination activities for the SSEP occur in a timely fashion.
51	150-O	PRO-1	General Comment	From Attachment A, scoping letter: In general, as the U.S. Bureau of Land Management (BLM) processes applications for solar development on public lands, we urge you to continue to improve the process. Among the areas where additional guidance is needed are: incorporating additional Best Management Practices (BMPs), refining the Right of Way (ROW) application process to properly address the differences between solar development and other uses of ROWs, and incorporating recommendations from ongoing transmission planning. In general, the BLM should work with appropriate state agencies to prioritize and help guide renewable energy development toward land that has already been developed for industrial, agricultural, or other intensive human uses that are close to existing transmission over ecologically-intact public lands.	Thank you for your comment. Although outside the scope of the federal decision to be made on this proposal (see Section 1.4.2 of the draft EIS), we note that the BLM is currently participating in the development of the Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States, which can be accessed at http://solareis.anl.gov/.
52	150-O	PRO-1	General Comment	From Attachment A, scoping letter: Our organizations support and are actively engaged in a number of multi-stakeholder processes aimed at identifying environmentally appropriate areas for solar energy development in Arizona and the West, including the Arizona Renewable Resource and Transmission Identification Task Force, the Western Governors' Association's Western Renewable Energy Zone process, and the BLM's plan to develop a Programmatic Environmental Impact Statement on Solar Energy. We urge you to incorporate the work of these processes as you move forward with permitting solar energy projects in the desert.	Thank you for your comment. The BLM has and will continue to incorporate information in the SSEP EIS process from the processes mentioned by the commenter.
53	150-O	PRO-1	General Comment	From Attachment A, scoping letter: In addition, our organizations have worked with other members of the environmental community in Arizona to develop criteria for use in identifying appropriate areas for development (see attachment A--criteria list).The criteria, which are attached, are designed to help guide renewable development, principally solar development, to appropriate locations. More specifically, the criteria are intended to inform current and future planning processes and to provide ecosystem level protection to Arizona's lands (including public, private and military lands) by giving preference for development to disturbed lands, steering development away from lands with high environmental values and protecting the desert's undeveloped cores. The criteria in essence seek to steer renewable energy projects to areas with comparatively low potential for conflict and controversy in order to facilitate their timely development. Our organizations will be employing the criteria in reviewing "fast-track" energy projects such as the Sonoran Solar project, as well as in reviewing proposed solar energy study areas, and we encourage your agencies to do so as well. "Fast-track" projects are those that may be able to qualify for stimulus funding through the American Recovery and Reinvestment Act of 2009 by breaking ground by December 2010. Because of the significant timing challenges facing projects seeking permits under such a short timeframe, it is especially important that these projects be screened for characteristics conducive to solar development and potentially difficult or controversial issues. Use of the attached criteria, as well as other screens, will allow your agencies to realistically assess the feasibility of getting projects permitted and "shovel ready" by December 2010. A realistic assessment of "shovel ready" viability will allow for better allocation of limited agency resources to those projects with the highest likelihood for success.	Boulevard used several criteria to eliminate areas from further consideration for their purposes in pursuing ROWs for solar development. The explanation of how and why each screening criterion was used by Boulevard has been expanded in the final EIS in Section 2.11.6. In Section 2.9.6 of the draft EIS the BLM provided rationale for eliminating alternative locations on BLM and private lands. This explanation has been expanded in the final EIS in Section 2.11.6.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
54	150-O	PRO-1	General Comment	From Attachment A, scoping letter: At the same time, however, we believe it is urgent that both the BLM work together with stakeholders to develop as quickly as possible a comprehensive approach to evaluating future projects that will ensure that the most appropriate sites for development are utilized while more sensitive sites are protected and preserved. Rather than proceed on a project by project basis in the future, we support a more comprehensive approach to the siting of these projects, the identification of areas appropriate for development, and the prioritization of already disturbed areas. We urge that you begin developing this approach as promptly as possible and would be pleased to help in any way we can	The SSEP is a site-specific project considered in a site specific EIS. Although outside the scope of the federal decision to be made on this proposal (see Section 1.4.2 of the draft EIS), we note that the BLM is currently participating in the development of the Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States, which can be accessed at http://solareis.anl.gov/.
80	150-O	PRO-1	General Comment	From Attachment A, scoping letter: The BLM has a responsibility to ensure that this proposed project is truly in the public's interest and that the trade-offs—industrial development in the desert near a wilderness area and national monument versus promoting renewable energy—are worth it. The Sonoran Solar Energy project will be the first solar project to begin the permitting process on BLM land in Arizona and has the opportunity to be a leader and a model for subsequent applicants in the process. By being sited on public lands, the Sonoran Solar Energy project will benefit from a public resource and should reflect a strong commitment to natural resource stewardship and the environment.	Thank you for your comment.
13	161-G	PRO-1	General Comment	The Draft EIS states that the Project Area is available for multiple uses. (1.3.1 Purpose of the Action) However, the project covers such a vast area from which all other uses (hiking, b king, horseback riding, camping, hunting, OHVs, grazing, etc.) would be eliminated that it really should count as a single use.	The draft EIS correctly states that the Project Area is available for multiple uses. The SSEP under the action alternatives would constitute one of these multiple uses. However, the commenter is correct that if the BLM approves the right-of-way application then the SSEP would constitute a single use of the Project Area for the life of the project.
17	161-G	PRO-1	General Comment	The National Energy Policy of 2001 and the Energy Policy Act of 2005 (Public Law [P.L.] 109-58, August 8, 2005) encourage the development of renewable energy resources, which includes solar energy. Section 211 of the Energy Policy Act of 2005 encourages the approval of at least 10,000 MW of non-hydropower renewable energy projects on public lands nationwide within the next 10 years. This one plant would cover nearly 4% of that amount. Given the amount of disturbed public land nationwide, BLM and other agencies need to make an inventory of such lands and see how many MWs can be accommodated on them before natural habitat needs to be used for renewable power.	The SSEP is a site-specific project considered in a site-specific EIS. It is outside the scope of BLM's decision to inventory disturbed public lands and to determine these lands' solar energy generation capacity with respect to the right-of-way application. Although outside the scope of the federal decision to be made on this proposal (see Section 1.4.2 of the draft EIS), we note that the BLM is currently participating in the development of the Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States, which can be accessed at http://solareis.anl.gov/.
2	162-I	PRO-1	General Comment	The current DEIS violates the spirit and intent of the National Environmental Policy Act. NEPA requires an agency to rigorously explore and objectively evaluate all reasonable alternatives. Reasonable alternatives are those alternatives that can be carried out feasibly based upon environmental, technical, economic and other criteria.	Chapter 2 of the draft EIS descr bes and explains how the BLM rigorously explored and objectively evaluated all reasonable alternatives with the information available at the time of publication. Since publication of the draft EIS, new information has become available that indicates that it is feasible to use photovoltaic technology to meet the purpose and need of the project. For this reason a photovoltaic (PV) alternative has been incorporated into the final EIS. Please see Sections 2.1 and 2.11.3 for an explanation of the new information indicating that PV is feasible. See Section 2.7 for a description of this alternative.
7	162-I	PRO-1	General Comment	Additionally, when a proposed project is part of a larger program, in this case creating alternative energy sources for American energy independence, the range of alternatives the agency is required to look at should be broadened.	Although the SSEP would certainly contribute to the larger goal of creating alternative energy sources for American energy independence, the range of alternatives is appropriate given that it is a site-specific project covered in a site-specific EIS. Although outside the scope of the federal decision to be made on this proposal (see Section 1.4.2 of the draft EIS), we note that the BLM is currently participating in the development of the Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States, which can be accessed at http://solareis.anl.gov/.
16	162-I	PRO-1	General Comment	Again, the thing tying the project proponent to this specific location is the proponent's desire for cheap access to existing transmission through an existing substation, cheap access to an existing gas pipeline, and the expectation of a land and water subsidy from the Federal government. The government should not be in the business of facilitating a private company's ability to make money at the expense of a truly unique resource and national treasure like SDNM—this violates the spirit and purpose of NEPA.	Chapters 1 and 2 of the draft EIS discuss the reasons why the Project Area was selected by the proponent and why alternative locations were eliminated from detailed analysis by the BLM. The rationale for eliminating alternative locations on BLM and private lands has been expanded in the final EIS in Section 2.11.6.
2	13-I	PRO-3	Agency Coordination/Consultation	The proponent has not even met with the Mayor or the hydrologist from the City of Buckeye prior to the public meeting.	Project meetings are documented in the draft EIS in Table 5.1 List of Meetings, Meeting Topics, and Meeting Attendees. As a cooperating agency for preparation of the EIS (see draft EIS Section 5.3.3 Cooperating Agency Involvement) the Town of Buckeye has been invited to participate in project meetings. The project proponent has opted to meet with groups and officials outside of the NEPA process as well. These meetings are at the discretion of the project proponent and are not reflective of the BLM's decision making process with respect to the SSEP.
2	144-G	PRO-3	Agency Coordination/Consultation	Please include attachment (B) [agency scoping meeting comment letter from MAOG dated September 1, 2009] in the Appendix A- Consultation Letters	Appendix B (A in the draft EIS) consists of consultation letters with federal agencies requiring formal consultation under Section 7 of the Endangered Species Act (ESA), Section 404 of the Clean Water Act (CWA), and Section 106 of the National Historic Preservation Act (NHPA). Letters submitted during the scoping period are included in the scoping report located in the administrative record.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	13-I	PRO-4	Public involvement	I felt the public meeting was smoke and mirrors intended to pacify the masses.... I am very familiar with public meetings. This was one was appalling.	Thank you for your comment.
4	150-O	PRO-4	Public involvement	In addition, BLM should be commended for the format of their public meetings for SSEP. These meetings included a presentation on SSEP from BLM and the project applicant, Boulevard Associates LLC, a subsidiary of NextEra Energy (NextEra). The meetings also allowed participants to submit written questions that were answered during a group question and answer session. One improvement would be to allow the public the opportunity for oral comments.	Thank you for your comment.
46	150-O	PRO-4	Public involvement	The hybrid open house/presentation and question and answer session format BLM has used for public meetings on the DEIS provides many benefits. These include the opportunity for the public to explore poster boards with project information at their own pace, ask questions of BLM staff and other experts, see a comprehensive presentation of the Proposed Action and the information in the DEIS, and ask questions to be answered by BLM staff and other experts in front of all attendees. This last part is critical, as the public needs to hear questions and answers from other stakeholders to fully participate in the process and understand others' recommendations and concerns. This format is far more effective for public engagement than the open-house-only format BLM is currently using for many other public meetings across the West. One improvement would be to allow the public the opportunity for oral comments.	Thank you for your comment.
1	141-G	PRO-5	General Permitting	The Department is currently in the process of reviewing a General Industrial Use (GID) permit application and four, associated well permit applications submitted by the applicant, Sonoran Solar Energy LLC, for the proposed project. A GIU (A.R.S. § 45~515) is a permitted groundwater withdrawal option that applicants located within AMAs can apply for when alternative grandfathered groundwater rights, nearby municipal water and renewable water sources, such as effluent or CAP, are unavailable: One requirement of a GIU applicant is to show that there is an "assured water supply" for the intended use at the intended point of withdraw (A.R.S. § 45-515 (A) (6)). It is important to note, that this requirement is different from the requirement of a subdivision to demonstrate an Assured or Adequate Water Supply.	Thank you for your comment.
2	141-G	PRO-5	General Permitting	The applicant, Sonoran Solar Energy, LLC, has applied to the Department for a GUI with a total annual demand of 2,581 AF. This water would be used annually by the proposed 375-megawatt (MW) concentrated solar thermal (CST) power plant for 30 years. Although the Department does not require that dry cooling technology be used by new power plants, power plants built within the AMAs after 1984 and that use groundwater for wet cooling are required to meet 15 cycles of concentration before blowing down their recycled cooling tower water. In addition to this conservation requirement, all industrial users withdrawing groundwater in the AMAs must meet basic conservation requirements such as avoiding waste as well as avoiding single pass cooling unless water is reused.	Section 2.5.4.1 of the draft EIS discusses water treatment and use consistent with the requirements of the Arizona Department of Water Resources.
1	149-G	PRO-5	General Permitting	We no longer consider it necessary for a CST power plant to obtain permit coverage for stormwater discharges under the Arizona Pollutant Discharge Elimination System's Multi-Sector General Permit (MSGP). In examining past guidance from the U.S. Environmental Protection Agency, we do not believe that the industrial activities associated with a CST power plant are intended to be covered under the MSGP.	Thank you for your comment. References to the need for an Arizona Pollutant Discharge Elimination System Multi-Sector General Permit have been removed from Sections 1.6.4 and 3.18.1.2.3 in the final EIS.
2	149-G	PRO-5	General Permitting	The Draft EIS mentions the need for a De Minimus General Permit (DMGP) Discharge Authorization before discharging groundwater produced during drilling or well development. Other elig ble activities under the DMGP include discharges associated with potable and reclaimed water systems and hydrostatic testing of specified types of pipelines. ADEQ issued a new DMGP on April 27, 2010. Further information on the DMGP can be found at: http://www.azdeq.gov/environ/water/permits/gen.html#demi or by contacting Lavinia Wright, ADEQ Project Manager for the De Minimus General Permit, at 602.771.4585 or by e-mail at wright.lavinia@azdeq.gov.	Thank you for your comment. BLM has informed Boulevard of this update.
3	149-G	PRO-5	General Permitting	This facility will most l kely require an Individual Aquifer Protection Permit due to the discharging facilities known to be associated with a project of this size and nature. The applicant should contact Ms. Carrolette Winstead in the APP& Drywell Unit at 602.771.4616 or via e-mail at cw6@azdeq.gov for more information.	Thank you for your comment. Section 1.6.4 and Table 1.5 of the draft EIS provide a listing of the permits required or potentially required for this project, including an individual aquifer protection permit.
4	149-G	PRO-5	General Permitting	A new drinking water distribution system will require plan review by the Maricopa County Environmental Services Department (MCESD), and possibly approval under ADEQ's capacity assurance development program. Please contact MCESD at 602.506.6666 or by email at sdwquestions@mail.maricopa.gov for more information. Please contact Kathy Stevens in ADEQ's Capacity Development Program at 602.771.4653 or by e-mail atkds@azdeq.gov	Thank you for your comment. Section 1.6.4 and Table 1.5 of the draft EIS provide a listing of the permits required or potentially required for this project. The draft EIS did not indicate that review of a new drinking water distribution system plan would require review and approval by the Maricopa County Environmental Services Department and the Arizona Department of Environmental Quality's capacity assurance development program, respectively. The final EIS has been updated in Section 1.6.4 and Table 1.5 to include reference to this.
1	138-G	PRO-6	Preferred Alternative Selection	Why did BLM select wet cooling over Alternative A (dry cooling) as the preferred alternative? Has NextEra said dry cooling is infeasible or doesn't provide enough payback?	At publication of the draft EIS, the BLM had not selected a preferred alternative. The maximum footprint, wet-cooled alternative analyzed in the draft EIS is the Proposed Action. BLM has identified Sub-alternative A1 as the preferred alternative in the final EIS. Please see Sections 2.1 and 2.7 in the final EIS for additional details.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
196	143-B	REC	212	pg 4-86 Section 4.11.3 5th P See also above. There are not eight noise-sensitive receptors identified in Section 4.9, there are, in fact, only three (LT-1, LT-2, and ST-2). ST-1 is institutional (a prison) and the remaining four locations are all wilderness/recreational areas. No information was found during the initial evaluation that would indicate that any pertinent governmental agency – whether city, county, or federal – has designated any of the analyzed recreational areas as being a "noise-sensitive" receptor. Yet, this section presumes that since they are remote and inherently quiet that they are, therefore, "noise-sensitive." Just because they are inherently quiet and just because some users might go to them seeking solitude does not justify defining them as "noise-sensitive" in the context of a technical impact assessment. The author then goes to great lengths to show "nearness" of these areas to the SSEP Project, but several of these areas are noted as being 3, 6, even 10 miles away from the Project area or another receptor. For sound propagation, these distances are simply not "near" and under normal circumstances in an environmental impact assessment would seldom, if ever, be under consideration for noise impacts due to their large distances from the studied sources. A 10 miles calculated distance to the Sierra Estrella Wilderness is accurate – but, properly put into context, from the nearest edge of the Project site to the nearest edge of the wilderness area. However, the nearest power block (which would be the dominant noise source relative to this wilderness area) is approximately 12 miles to the nearest edge of the wilderness and on the order of 16½ miles to the center of the wilderness. Talking about noise and wilderness area "diminished" use and "intrusion" (from the previous paragraph) at these extreme propagation distances is a stretch.	The term noise-sensitive receptor has been changed to noise receptors in Section 4.11.3 of the final EIS and elsewhere as appropriate. The BLM uses the term "near" in reference to the noise receptors being near or within the recreation areas, not the proximity of the recreation areas to the Project Area. In addition, BLM qualifies the statement by noting "However, as visitors venture deeper into adjacent recreation areas and further from the Project Area, this intrusion would lessen and eventually cease." Intrusive noise is defined in Chapter 3 of the draft EIS as "Noise that intrudes over and above the existing ambient noise at a given location." According to Table 4.58 Ambient, Construction, and Operational Noise Levels at Select Noise Receptors, construction noise levels would increase over the ambient noise levels up to 12.0 dBA at the ST-3 receptor and up to 4.0 dBA at the LT-3 receptor. Based on the assumption stated in Section 4.14 Special Designations Analysis Areas and Analysis Assumptions that "Impacts from noise are evaluated in terms of whether they would increase the ambient noise environment (and thus affect a visitor's recreation experience)" and based on the noted increase in ambient noise levels, it is reasonable to conclude that there would be noise intrusions that would diminish the natural quiet for some visitors.
197	143-B	REC	212	pg 4-86,7 Section 4.11.3 6th P This paragraph makes several generalizations with little explanation or clarification The wording makes it sound as if a 5 to 12 dB increase would be across the board, at all receptors, and under all conditions (not true). The text does not differentiate between short-term construction noise levels and plant lifetime, on-going noise levels; a serious failing.	The text has been changed in the final EIS in Section 4.11.3 to differentiate between short-term construction noise levels and operational noise levels. In addition, text has been added to the final EIS to clarify the changes in sound levels at each individual receptor.
15	143-B	REC-1	General Comment	pg ES-10 Section ES 6.10 The first statement seems to have an implied premise that the SSEP Project Area is now a designated recreational area that will be altered by, among several things, noise. The project area is current designated for multiple uses, one of which is recreation. To say, then, that such recreational use will be impacted could be misleading.	The statement differentiates between the Project Area and a designated recreational area by stating that "the action alternatives would alter the recreational setting and opportunities of the Project Area..." The statement is included in the Recreation and Wilderness Characteristics Section (4.11) of the draft EIS so it is reasonable to conclude that the writer is referring to recreational use and not other uses. The word "adjacent" has been added to the second sentence of Section ES 6.10 of the final EIS to clarify that the designated recreational areas are adjacent to and not within the Project Area.
59	143-B	REC-1	General Comment	pg 3-59 Section 3.11.3 Third paragraph, first sentence. Insert "the" in front of BLM.	The change has been made in the final EIS.
60	143-B	REC-1	General Comment	pg 3-60 Section 3.11.3 Second paragraph on page, second sentence. Replace "lying" with "located".	The change has been made in the final EIS.
61	143-B	REC-1	General Comment	pg 3-60 Section 3.11.4 Bottom paragraph, first sentence. Here we reference "Margie's Peak". On page 4-85, "Margie's Cove" is referenced. Which is it?	Margie's Cove and Margie's Peak are both correct depending on the specific location being referenced. In this particular case the correct name is Margie's Peak. Sections 3.11 and 4.11 of the final EIS has been revised accordingly.
180	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1 First paragraph, third sentence. Rewrite to read "Impacts to the areas …"	The change has been made in the final EIS.
181	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1 Fifth paragraph, first sentence. Here we reference "Margie's Cove". On page 3-60, "Margie's Peak" is referenced. Which is it?	Margie's Cove and Margie's Peak are both correct depending on the specific location being referenced. In this particular case the correct name is Margie's Peak. Section 4.11 of the final EIS has been revised accordingly.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
182	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1 , 3rd P The stated criteria used for impacts to the recreation experience are unquantifiable, subjective, highly location dependent, and overly restrictive. Consider revision.	To assess impacts for a reasonably foreseeable action in the absence of quantifiable information, qualitative methods may be used as long as the assumptions on which the analysis is based are stated. To clarify the assumptions used for the recreation and wilderness characteristics analysis, Section 4.11.1 has been revised in the final EIS to state that "Given the wide variation in individual thresholds of annoyance, habituation to noise, and situational reactions to noisy environments, there is no common standard for assessing the subjective effects of noise, or to measure the corresponding reactions of annoyance and dissatisfaction. One way of assessing a person's subjective reaction to a new noise is to compare it to the existing or ambient environment familiar to that person. An increase of 1–2 dBA in sound levels is a nonperceptible change to the human ear a. An increase of 3-dBA may or may not be distinguishable in an outdoor environment. A 5-dBA increase or greater is a perceptible change and is clearly discernible in an outdoor environment (ASHRAI 1989). This analysis assumes that a certain portion of visitors to recreational and wilderness areas are seeking opportunities for quiet and that any noise level increase of 5 dBA or greater would percept bly diminish one's experience of quietness."
183	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1 , 5th P Typo: rather than "For the purposes of this EIS analysis, it is not know if this area….", it should be "it is not known if this area…"	The change has been made in the final EIS.
184	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1, 6th P This paragraph seems to say that any noise from SSEP construction or operations would, by definition, result in a degraded experience in any (and all) of the nearby recreational areas. As with the comment immediately above, detectability/audibility of noise at any given point in a recreational area is subjective, highly location dependent, individual-specific, and may or may not be measureable with sound instruments. If one can just barely hear the distant drone from the SSEP operations, but the nearby sounds from cicadas is much louder than the plant, is the recreational experience degraded due to the just-detect ble plant? Further, even ignoring all these issues, does a degraded experience automatically equal a significant impact?	The paragraph notes that impacts will be variable by stating "...in varying degrees, depending on recreation activity, distance, topography, and preferences of individual visitors." The paragraph has been revised in the final EIS to differentiate noise impacts from visual impacts. In addition, a statement has been added to the final EIS to note the changes in noise levels during construction at the pertinent recreation receptors to clarify where one could expect to experience noise impacts.
185	143-B	REC-1	General Comment	pg 4-85 Section 4.11.1 Sixth paragraph, second sentence. Replace "would" with "could potentially".	The NEPA process is intended to help public officials make decisions that are based on the understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1(c)). The term "could potentially" is typically avoided in NEPA documents because it is generally too vague to help in decision-making. If the analysis has used reasonable assumptions to discuss impacts, then the term "would" is used. Case law has shown that the BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable effects of the proposed action and alternatives. In this context, reasonably foreseeable means that "the impact is sufficiently l kely to occur that a person of ordinary prudence would take it into account in reaching a decision." The final EIS states in Section 4.11.1 Analysis Area and Analysis Assumptions that "the greater the degree of contrast, the more vis ble the SSEP would be on the landscape, and the greater the effect to the recreational activities, settings, and experiences." Using this assumption, along with the information presented in the Visual section that states that there would be strong contrasts from KOPs within the recreation areas, the use of the term "would" is appropriate.
186	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Third paragraph last sentence- Remove the last sentence or reword it. The new road from SR 85 to the SSEP will NOT provide additional access to public lands	The BLM declines to make the change. The new road from SR 85 to the SSEP would be open (with speed bumps) and would provide additional access to public lands.
187	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 In the access section it says the project would restrict access to the area. This section says, the new access road would provide additional access to public lands	There would be a loss of access within the boundaries of the Project Area because of fencing and conversion to solar fields. However, the new road from SR 85 to the SSEP would be open (with speed bumps) and would provide additional access to public lands.
188	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Referring to paragraph that begins.."Noise of construction and operation…". Only two locations during construction would produce noise levels louder than the ambient conditions. Even though these locations would have increased noise levels, their level would still be considered as "quiet" on a noise comparison table. Would the minimal addition to the ambient levels be an adverse impact if the result is still a quiet environment?	This section has been changed in the final EIS to clarify that predicted noise levels at all receptors would not increase above ambient levels during operations. During construction noise levels would exceed ambient conditions by approximately 12.0 dBA at Receptor ST-3 and by 4.0 dBA at LT-3. The, the following assumptions were added to Section 4.11 Recreation and Wilderness Characteristics: "An increase of 1–2 dBA in sound levels is a nonpercept ble change to the human ear. An increase of 3–4 dBA may or may not be distinguishable in an outdoor environment. A 5-dBA increase or greater is a perceptible change and is clearly discernible in an outdoor environment (ASHRAE 1989. In addition a statement noting that 40 dBA gives the subjective impression of quiet has been added to the final EIS in Section 4.11.3.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
189	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Agreed that the solar facility would be visible, but other industrial facilities (substation, mining operation, landfill, transmission lines, prison) are also visible. To what degree would the addition of the solar facility to an area that is already populated with industrial facilities be an adverse impact?	The presence of other industrial facilities within the viewshed of the Project Area is disclosed in Section 3.17.3 of the draft EIS. This section states "Cultural Modifications contribute to the overall visual character of the Project Area and analysis area. Conditions range from natural to completely modified and include pipelines, transmission lines, transportation routes, and other structural features that modify the natural setting." The assumptions in Section 4.11.1 of the draft EIS state that "The greater the degree of contrast, the more visible the SSEP would be on the landscape, and therefore the greater the impact to the recreational activities, settings, and experiences." Based on this assumption and the information presented in the draft EIS in Section 4.17 Visual Resources, that note that the SSEP would create strong contrasts from some KOPs, the use of the term "adverse impact" is appropriate. Additionally, information about the cumulative impacts to visual resources in and around the Project Area are disclosed in Section 4.20 Cumulative Impacts, including the proportion of surface disturbance expected from the SSEP in relation to existing disturbance.
190	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Second paragraph, last sentence. The landscape is referred to as "changing to industrial." Significant industrial infrastructure already exists in the area. This statement leads the reader to believe that the existing character of the land is native desert.	In the final EIS the term "in the Project Area" has been added to the sentence between "setting" and "would see" to clarify that the discussion of impacts in this paragraph applies to the Project Area only and not the surrounding landscape.
191	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Third paragraph, second sentence. Change "would" to "could potentially".	As noted in Section 4.7 Land Use and Access of the draft EIS, there would be an increase of 1,000 vehicle trips during construction. In addition, the LOS delays would be greater than 120 seconds in some locations during construction, as shown in Table 4.62 2012 Peak Hour Levels of Service. Therefore, it is reasonable to conclude that there would be delays for some recreationists.
192	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Third paragraph, last sentence. Change "would" to "could potentially".	The BLM declines to make the change. The new road from SR 85 to the SSEP would be open (with speed bumps) and would provide additional access to public lands.
193	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Fourth paragraph, first sentence. Rewrite to say "Noise from construction and operation of the SSEP could potentially affect …"	In the draft EIS Section 4.11.1 Recreation and Wilderness Characteristics Analysis Area and Analysis Assumptions states that "impacts to the areas with wilderness characteristics will be determined by...changes to the opportunities for solitude and/or primitive recreation provided by these areas." During construction the noise levels would increase by up to 12.0 dBA as shown in the draft EIS in Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations. Information has been added to the final EIS in Section 4.11.1 Analysis Area and Assumptions to provide context for this level of change.
194	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3 Fourth paragraph, third sentence. Change "would" to "could potentially".	Section 4.11.1 Recreation and Wilderness Characteristics Analysis Area and Analysis Assumptions of the draft EIS states that "impacts to the areas with wilderness characteristics will be determined by...changes to the opportunities for solitude and/or primitive recreation provided by these areas." During construction the noise levels would increase up to 12.0 dBA as shown in the draft EIS in Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations. Information has been added to the final EIS to provide context for this level of change.
195	143-B	REC-1	General Comment	pg 4-86 Section 4.11.3. 4th P The wording implies that it is a foregone conclusion that the SSEP noise "would" diminish the natural quiet of these areas with the implication that such diminishment would be throughout the entirety of all these areas. Such implications or inferences are unsubstantiated. Secondly, these recreational areas are lumped in with "noise-sensitive locations", which is not a standard classification for outdoor, wilderness, parkland, or open space land uses. "Noise-sensitive receptors" more typically include residential, hospital, school, and house of worship land uses wherein communication, speech intellig bility, rest, recuperation, and sleep are of concern. Thirdly, there is no evidence in either the Tech Report or this DEIS to corroborate statements about noise impacts to the named recreational areas. To the contrary, the Tech Report shows that SSEP daytime operations noise will be less than 25 dBA throughout the entire NMMW; and more typically, less than 15 dBA. L kewise, predictions of SSEP noise in the BHRA are between 15 and 20 dBA. Similarly, predictions for SSEP noise in the SDNM are generally in the 10 to 25 dBA range, with levels between 30 and 35 dBA only at the flat portions near the areas northern entrance. With measured daytime levels predominantly around 30 dBA for the SDNM, these predicted levels for plant contr butions would be, at the very worst, barely detectable, and generally totally inaud ble. Given that the BHRA is next to SR-85, it would be extremely unlikely that SSEP noise could possibly be heard over the much closer traffic noise sources on this busy highway. Lastly, the Sierra Estrella Wilderness is between 12 and 15 miles to the east of the SSEP site and, as a result, there would be no reasonable expectations of plant noise propagating that far and to the extent of creating any kind of intrusion on or diminished enjoyment of these recreational areas.	The commentor is correct in stating that SSEP operation noise levels would not be above ambient conditions. However, construction noise levels would be 5-12 dB above ambient conditions at recreational noise receptors. The final EIS has been revised and the referenced paragraph now states "Based on the information in Table 4.58, ambient noise levels would increase by 5–12 dBA at recreational noise receptors during the 39-month construction period. The increases in noise levels could affect the recreational experience for some visitors in the North Maricopa Mountains Wilderness and the Sonoran Desert National Monument. Noise levels would be no more than 44 dBA. As visitors venture deeper into the recreation areas and further from the Project Area, this intrusion would lessen and eventually cease. The effect of this increase in noise on individual visitors would vary, depending on their desired recreation activity and experience and tolerance to the intrusion. Noise levels would not be above ambient sound levels during operations; therefore, there would be no effect on the recreational experience in North Maricopa Mountains Wilderness and Sonoran Desert National Monument after the construction period."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
198	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3 Table 4.45 The author specifically mentions eight noise-sensitive receptors in this section, while this table only includes six receptors. The table is labeled with "at select noise monitoring stations", but the exclusion of LT-1 and ST-2 is left unexplained (also, these are not noise monitoring stations, these are correctly described as noise assessment locations). Further, the table uses the single-metric, 24-hour average values for LT receptors (since the DEIS did not include the long-term time history data) or the single-sample, 15-minute data for the ST receptors. Using only these noise metrics is probably too coarse of a view, given the available data, upon which to be making such sweeping and generalized conclusions. Results for Locations ST-2 and LT-1 should be included for completeness, as should the extent of the associated available data (i.e. LT time history charts), and the proper explanation, qualification, and contextualization should be supplied to given the lead agency, interested parties, and the general public the proper, balanced, and full picture of the noise environments associated with the SSEP. {Note: these excluded receptor locations, being the closest to the SSEP site, will have higher noise levels than the tabled receptor locations for both construction and operations noise….all the more reason to properly explain and fully provide appropriate context to the analysis results].	In the draft EIS Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations was included with the intention of showing the noise receptors that are pertinent to impacts to recreation and wilderness characteristics, of which there are six. This is noted in the draft EIS in Section 4.11.3 "Eight noise receptor locations are identified in Section 4.9 (Noise); six of these are near or within the recreation areas or areas with wilderness characteristics..." A footnote has been added to Table 4.58 of the final EIS to clarify that only six noise monitoring stations (receptors) are included in the table because they are the only ones that are relevant to the recreation and wilderness characteristics analysis.
199	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3 First full sentence on page. Remove word "also" from within parentheses.	The change has been made in the final EIS.
200	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3 First full paragraph, first sentence. Change "would" to "could potentially".	This sentence has been changed in the final EIS to "The Project Area would be visible to recreationists in all of the recreation areas and the area with wilderness characteristics, except for the Buckeye Hills Regional Park, which would be completely screened from the SSEP when viewed at lower elevations."
201	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3 First full paragraph, second sentence. Change "would" to "could potentially".	The BLM declines to make the suggested change. The statement notes that the impacts would apply to high-sensitivity viewers only. In addition, in the draft EIS Section 4.11.1 Analysis Area and Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Using this assumption and the assumption that there would be visitors in the Sonoran Desert National Monument the statement is appropriate.
202	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3 First full paragraph, penultimate sentence. Change "would" to "could potentially".	In the draft EIS Section 4.11.1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources of the draft EIS. No change has been made in the final EIS because the impact can reasonably be expected to occur.
203	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3.1 Second sentence. Replace "with" with "under consideration for having".	The change has been made in the final EIS.
204	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3.1 Third sentence. Change "would" to "could potentially".	In the draft EIS Section 4.11.1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP would be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources of the draft EIS. Therefore it can reasonably be expected that opportunities for primitive and unconfined recreation would be adversely impacted for some users. The sentence has been revised in the final EIS to state "However, opportunities for primitive and unconfined recreation would be adversely impacted in some locations for sensitive viewers (such as photographers) by the sights from construction and operation of the SSEP."
205	143-B	REC-1	General Comment	pg 4-87 Section 4.11.3.1 Fourth sentence. Change "would" to "could potentially".	In the draft EIS Section 4.11.1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP would be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources of the draft EIS. The sentence has been revised in the final EIS to state that "As described in the Recreation analysis above, the experience (solitude, isolation) and the undisturbed setting needed to support recreation activities l ke h king, camping, and other primitive outdoor activities in the area that is under consideration for having wilderness characteristics would be diminished for sensitive users (such as photographers) by the presence (sight) of the SSEP for some distance into the area."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
206	143-B	REC-1	General Comment	pg 4-88 Section 4.11.7 This mitigation measure is not reasonable. Access from SR 85 will consistent with ADOT's recommended safety guidelines, and the access road would not be for public use. There is minimal access to the adjacent areas from this access road, there will be posted speed limits, wildlife fencing, and a gated entrance. Traffic control personnel should not be required.	This potential mitigation measure has been deleted in the final EIS.
207	143-B	REC-1	General Comment	pg 4-88 Section 4.11.8 First paragraph, first sentence. Replace "utilization" with "use".	The change has been made in the final EIS.
208	143-B	REC-1	General Comment	pg 4-88 Section 4.11.8 First paragraph, second sentence. Rewrite to say "Maintenance of access roads would …"	The change has been made in the final EIS.
209	143-B	REC-1	General Comment	pg 4-88 Section 4.11.9 First sentence. Remove comma.	The change has been made in the final EIS.
210	143-B	REC-1	General Comment	pg 4-89 Section 4.11.9 Partial sentence at beginning of page. Rewrite to say "… vegetation disturbances and changes of the land use…"	The change has been made in the final EIS.
211	143-B	REC-1	General Comment	pg 4-89 Section 4.11.10 First paragraph, first sentence. Language is awkward, rewrite sentence, or provide more explanation.	In the final EIS the first paragraph, first sentence of Section 4.11.12 has been modified to provide additional explanation.
305	143-B	REC-1	General Comment	pg 4-204 Section 4.20.4.10.1 First full sentence on page. Replace both "would"s with "could potentially".	The BLM declines to make the suggested change. Currently visitors can recreate in the Project Area as noted in the draft EIS Section 3.11, Recreation and Wilderness Characteristics. Section 2.5.1.1 Facilities Locations and Components of the draft EIS states that the arrays of solar troughs would occupy approximately 2,300 acres of the 3,700-acre site. Therefore it is a reasonable conclusion that portions of the Project Area would not be accessible after construction of the SSEP, thereby impacting opportunities for solitude and unconfined recreation.
306	143-B	REC-1	General Comment	pg 4-204 Section 4.20.4.10.1, 4 The over-reaching conclusion of "noise intrusions" is again stated as being a certainty ("would impact …"). Also, by the use of the word "intrusions", the author implies a negative connotation and assumes that any noise level increase in a wilderness area is, by presumption, an impact. See also comments on 4.9.1, 4.9.3.2, 4.14.1, and 4.14.3.	Intrusive noise is defined in Chapter 3 of the draft EIS as "Noise that intrudes over and above the existing ambient noise at a given location." According to Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations in the draft EIS, construction noise levels would increase over the ambient noise levels by approximately 12.0 dBA at the ST-3 receptor and by 4.0 dBA at the LT-3 receptor. Based on the assumption stated in Section 4.14 Special Designations Analysis Areas and Analysis Assumptions of the draft EIS that "Impacts from noise are evaluated in terms of whether they would increase the ambient noise environment, and thus affect a visitor's recreation experience" and the noted increases in ambient noise levels, the impact can be reasonably expected to occur.
7	161-G	REC-1	General Comment	We are also concerned about the Regional Trail system that our Department [Maricopa County] manages. One of the proposed routes passes along the northwest side of the project area, roughly along the existing dirt road. According to Map 2, part of the trail's route would be severely affected by an upgraded road, new short roads branching from the upgraded road, and a generation tie line. While the exact trail route has not been determined and we are flex ble to tweaking it, the size of the project would call for major changes of the route or might even make it infeasible.	The SSEP would not affect the development of trails of the Maricopa's Regional Trail System. BLM contacted a representative from Maricopa County and was assured that the SSEP would not affect the development of trails in the Maricopa County Regional Trail System. Please see the following website for more information on the proposed Regional Trail system and a map showing the location of future trails: http://www.maricopa.gov/parks/MaricopaTrail/.
12	161-G	REC-1	General Comment	The Draft EIS states that the Project Area is available for multiple uses. (1.3.1 Purpose of the Action) However, the project covers such a vast area from which all other uses (hiking, b king, horseback riding, camping, hunting, OHVs, grazing, etc.) would be eliminated that it really should count as a single use.	Thank you for your comment.
23	161-G	REC-1	General Comment	Please be aware that "Buckeye Hills Recreation(al) Area" is now officially "Buckeye Hills Regional Park".	This correction has been made in the final EIS.
7	134-I	REC-3	Shooting	Please regulate target shooting on BLM (South of Riggs I87th) Automatic Weapons, Canons, Machine guns etc. Dangerous for recreational use and passer Byers.	Regulating target shooting on BLM-managed land is beyond the scope of the decisions to be made following completion of this EIS. In this EIS the BLM is considering whether or not to grant a right-of-way for a solar power-generating facility and, if granted, under what conditions, as noted in the draft EIS in Section 1.4.2 Decisions to be Made Through This EIS. Please contact the BLM Lower Sonoran Field Office regarding your concerns.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	161-G	REC-5	Protection of recreational open space	We are concerned about the loss of natural, publicly-owned open space at a time when increasing populations, demand for recreation, and habitat concerns make it increasingly important to protect such areas.	Thank you for your comment. Impacts to various land uses under each of the alternatives are disclosed in Section 4.7 Land Use and Access of the draft EIS. Section 1.3 of the draft EIS descr bes the BLM's purpose and need for the action, and Section 1.4.2describes the decisions to be made.
10	161-G	REC-5	Protection of recreational open space	Natural open space, especially on public land, is a non-renewable resource that needs to be conserved, especially with population growth and the loss of open space on private and State Trust land. The anticipated loss of natural vegetation, as described in 4.20.4.14.1, due to development on private and state land makes it more important to prevent large-scale loss on public lands. What may be forgotten flatlands today may become valuable recreational open space in the future.	Thank you for your comment. Impacts to various land uses under each of the alternatives are disclosed in Section 4.7 Land Use and Access of the draft EIS. Section 1.3 of the draft EIS descr bes the BLM's purpose and need for the action, and Section 1.4.2 describes the decisions to be made.
3	135-G	RLM-1	General Comment	The DEIS should clearly define who would be responsible for the reclamation of the site and what would happen if bankruptcy were declared. We recommend establishing a bond or escrow account for the project.	Section 2.5.5.2 of the final EIS has been revised to clarify that site reclamation would be the responsibility of the entity holding the right-of-way grant (whether the proponent or another entity) at the time of closure and decommissioning of the project, and that the BLM would also require a bond.
11	139-G	RLM-1	General Comment	A post-closure bond or account, along with a specific post-closure plan/document, should be required to address any possible contaminated soil or hazardous waste remediation issues. Delineating the actions that will occur after the closure of the facility will ensure that the area is returned to a natural state and does not financially obligate future stakeholders with remedial activities. The post-closure plan and financial obligation could be modeled after landfill post-closure requirements.	Section 2.5.5 of the final EIS has been revised to clarify that both a performance and reclamation bond and a Decommissioning and Site Reclamation Plan (DSRP) would be required if the BLM selects an action alternative for a right-of-way grant. The section explains that the DSRP would be included as part of the project's Plan of Development (POD) which must be completed and approved prior to construction.
84	150-O	RLM-1	General Comment	From Attachment A, scoping letter: To ensure adequate funds are available for complete restoration of the project site after the project is retired or if for some reason it is abandoned by the developer before it is completed, the BLM should to develop a robust set of guidelines for establishing appropriate bonding figures. The BLM should do a thorough analysis of the anticipated costs of decommissioning and restoring the project site. The BLM should also require bonds be purchased prior to development.	Section 2.5.5 of the final EIS has been revised to clarify that both a performance and reclamation bond and a Decommissioning and Site Reclamation Plan (DSRP) would be required if the BLM selects an action alternative for a right-of-way grant. The section explains that the DSRP would be used as the basis for determining the full bond amount.
14	161-G	RLM-1	General Comment	Section 2.5.5 Termination and Reclamation: A lifespan of 30 years for the project is stated, and another facility would not be built. Is there enough sustainable water for permanent facilities? Section 2.6 Alternative A: Reduced Water Use also states a 30-year life span (Section 2.6.5 Termination and Reclamation) so water use does not seem to be the reason for this time limit. Or is the use of groundwater non-sustainable so that the plant would have to be terminated in 30 years?	Section 2.5.5 of the draft EIS explains that specific post-closure land uses have not been identified because it is not possible to predict the conditions and management objectives that would exist at the time of closure. This section has been clarified in the final EIS to explain that a 30-year right-of-way authorization is proposed under all action alternatives due to the substantial investments required for a typical solar energy project and the projected life of these facilities. In this case, resource constraints do not contr bute to the right-of-way timeframe. Section 2.5.5 of the final EIS also clarifies that the ROW authorization would include a specific provision allowing for renewal, consistent with 43 CFR 2807.22. However, the BLM cannot predict conditions 30 years in the future so the analysis assumes that 30 years would be the extent of the useful life of the project.
15	161-G	RLM-1	General Comment	We wonder about the wisdom of losing such a large area of natural habitat for what amounts to a temporary use of the land. The Draft EIS clearly implies that there will be no successor.	Section 2.5.5 of the draft EIS describes the termination and reclamation of the SSEP following its useful life. As explained in this section, specific post-closure land uses have not been identified because it is not poss ble to predict the conditions and management objectives that would exist at the time of closure.
3	77-I	SD-1	General Comment	I am concerned that… Monument and wilderness areas not be disturbed during construction or use.	The construction and operation of the SSEP would occur wholly outside of the Sonoran Desert National Monument and nearby wilderness areas and areas with wilderness characteristics. Potential indirect impacts to these areas are discussed in the draft EIS in Sections 4.11 and 4.14.
62	143-B	SD-1	General Comment	pg 3-84 Section 3.14.2 First sentence. Rewrite to read "… Wilderness Act of 1964 and FLPMA of 1976."	The change has been made in the final EIS.
220	143-B	SD-1	General Comment	pg 4-118 Section 4.14.1 10-11 The main noise section regarding impacts, section 4.9, did not adequately establish impact criteria for noise sensitive receptors. Yet, this section states that any (emphasis added) increase in the ambient noise environment constitutes an impact to a visitor's recreational experience (in an area that has not been established in the DEIS as a noise-sensitive receptor area). If any increase in ambient conditions, even disregarding the receiving land use type, were a common impact threshold, then there would be no development of any kind anywhere in the country. A zero-increase-to-ambient is not a realistic, prudent, or economically-feasible approach for establishing a noise impact threshold.	The definition of an intrusive noise has been added to the final EIS in Section 4.9.1 Noise Analysis Area and Assumptions. Section 3.9.3 Fundamentals of Acoustics defines an intrusive noise as "noise that intrudes over and above the existing ambient condition at a given location." In addition, the following information hasbeen added to Section 4.14 of the final EIS to clarify the perception of sound levels: "An increase of 1–2 dBA is considered a nonperceptible change. An increase of 3-dBA may or may not be distinguishable in an outdoor environment. A 5-dBA or greater increase is described as a perceptible change and is clearly discern ble (ASHRAE 1989).
222	143-B	SD-1	General Comment	pg 4-118 Section 4.14 General Comment - recreation, special designations and wilderness areas are discussed in several of the sections which make the impacts seem more excessive than they really are. Suggest consolidating them into one section.	BLM declines to make the change. BLM wilderness areas fall under the category of Special Designations and are discussed in that section of the draft EIS. Recreation and wilderness characteristics are not Special Designations and therefore warrant a separate section. In addition, recreation and wilderness characteristics are already consolidated into one section of the draft EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
223	143-B	SD-1	General Comment	pg 4-118 Section 4.14.1 *Statement in question: "These three areas lie outside of the Project Area; however, they would be subject to indirect impacts from changes to the viewshed, increases in noise, changes in access, and impacts to wildlife from activities associated with construction and operation of the SSEP."* Second paragraph, first sentence. Change "would" to "could potentially".	BLM declines to make the change. It has been established based on the listed assumptions that there would be 1) a change to the viewshed (draft EIS Section 4.17, Visual Resources); 2) changes in access due to the construction of the SSEP (draft EIS Section 4.15, Transportation and Traffic); and 3) impacts to wildlife from displacement, habitat degradation, habitat fragmentation and road barrier effects (draft EIS Section 4.19, Wildlife and Special-status Species). The wording "increases in noise" has been changed in the final EIS to "increases in ambient sound levels" which has been demonstrated in draft EIS Section 4.9 Noise.
224	143-B	SD-1	General Comment	pg 4-118 Section 4.14.3 First sentence. Throughout the document, there have been references to this figure as 3,700, 3,600, and even 3,500. Document should be consistent in declarations is total disturbed acreage.	In some cases, acre figures vary because they refer to different areas or impacts (short term or long term). However, BLM has reviewed each usage and any errors have been corrected in the final EIS.
225	143-B	SD-1	General Comment	4-118 4.14.3 Second sentence. Change "would" to "could potentially".	The NEPA process is intended to help public officials make decisions that are based on the understanding of environmental consequences, and take actions that protect, restore, and enhance the environment (40 CFR 1500.1(c)). The term "could potentially" is typically avoided in NEPA documents because it is generally too vague to help in decision-making. If the analysis has used reasonable assumptions to discuss impacts, then the term "would" is used. Case law has shown that the BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable effects of the proposed action and alternatives. In this context, reasonably foreseeable means that "the impact is sufficiently l kely to occur that a person of ordinary prudence would take it into account in reaching a decision." The draft EIS states in Section 4.14.3 that "The SSEP would introduce a large (approximately 3,620-acre) facility to the landscape. There would be no change to the recreational setting in any of the special designation areas; however, the presence (views) of this facility would degrade the desired, primitive experience that visitors seek when visiting the nearby monument and wilderness." With this information in mind the use of the term "would" in the referenced sentence is appropriate.
226	143-B	SD-1	General Comment	4-118 4.14.3 , Fourth sentence. The statement that there would be "no" change to the setting contradicts earlier statements, and even the sentence following.	The statement in the draft EIS that "There would be no change to the recreational setting in any of the special designation areas…" refers to the fact that no project related surface disturbing activities are planned or intended to occur directly within the boundary of any special designations areas. This is accurate and does not contradict the statement that views "of this facility would degrade the desired, primitive experience that visitors seek when visiting the nearby monument and wilderness."
227	143-B	SD-1	General Comment	pg 4-118 Section 4.14.3 Fourth sentence. Change "would" to "could potentially".	Section 4.11. 1 Recreation and Wilderness Characteristics Analysis Assumptions of the draft EIS states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources. Therefore it is reasonable to conclude that the view of this facility would degrade the primitive experience for some users. The sentence has been revised in the final EIS to state that "There would be no change to the recreational setting in any of the special designation areas; however, the presence (views) of this facility would degrade the primitive experience that some visitors seek when visiting the nearby monument and wilderness. These changes would not be vis ble from all locations, and would be most apparent from locations close to the Project Area and from peaks with expansive vistas."
228	143-B	SD-1	General Comment	pg 4-118 Section 4.14.3 Eighth sentence. Change "would" to "could potentially".	The suggested wording change has not been incorporated because the impact in question can be reasonably expected to occur. However, the statement has been clarified in the final EIS by adding the words "...in portions..." to the referenced sentence to indicate that topography would not mitigate or eliminate these effects in the entirety of the adjacent and nearby wilderness areas.
229	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Again, an increase in 4-5 dBA would still be considered a quiet environment. Would this be an adverse impact?	For the purposes of the draft EIS an impact was defined as any increase in the ambient noise levels as stated in Section 4.14 Special Designations. By this definition an increase of 4–5 dBA would be considered an impact. The noise levels at the ST-3 (North Maricopa Mountains Wilderness) receptor would increase from 28.2 dBA to 40 dBA and from 39.7 dBA to 44 dBA at the LT-3 (Sonoran Desert National Monument) receptor during construction. This is an increase of approximately 12. 0 and 4.0 dBA, respectively. A quiet environment as defined by Table 3.21 Typical Sound Levels Measured in the Environment and Industry would be 40 dBA or less. Section 4.14 of the final EIS has been revised to explain that an increase of 5 dBA is a clearly discernible change in an outdoor environment (ASHRAE 1989).

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
230	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Traffic would not travel on Komatke Rd. They would access the site from SR 85 via the new access road.	This statement has been corrected in the final EIS as suggested.
231	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Third full sentence. "Block" is misspelled.	The error has been corrected in the final EIS
232	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Fifth full sentence. Change "would" to "could potentially".	Section 4.14.1 Special Designations Analysis Area and Analysis Assumptions states that "Impacts to the recreation are evaluated in terms of whether there would be...changes to the current vegetation communities, and changes to the natural or undeveloped character of the landscape." Based on this assumption and the fact that the vegetation would be cleared from the 3,600-acre Project Area, it is reasonably expected that there would be an impact on the recreation setting, and no change has been made to the final EIS.
233	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Fifth full sentence. As stated in previous comments, the project site isn't necessarily a current "natural setting." See following sentence, where it states that it "already includes views of residential areas, industrial sites, and utility corridors."	The term "natural setting" as used in this sentence applies to the Project Area only, because it is undeveloped. The following sentence is referring to the larger viewshed. These two sentences were changed in the final EIS to clarify the difference.
234	143-B	SD-1	General Comment	pg 4-119 Section.14.3 Seventh full sentence. Change first "would" to "could potentially".	Section 4.19.1 Wildlife and Special-status Species Analysis Area and Analysis Assumptions states that "Because the presence of wildlife species is so closely tied to the presence and quality of a vegetation community or resource, the analysis of impacts to wildlife is measured in the following ways: acres of vegetation lost or degraded and the percent of the width of each linkage lost or degraded. The acreage of a vegetation community that is lost or degraded describes the type of habitat that is lost." Based on this assumption and fact that 3,600 acres of vegetation would be cleared from the Project Area, it is reasonable to expect that the referenced wildlife-related impacts would occur.
235	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 First full paragraph, fourth sentence. Change "would" to "could potentially".	Section 4.14. Special Designations Analysis Area and Analysis Assumptions of the draft EIS states that "Impacts from noise are evaluated in terms of whether they would increase the ambient noise environment." During construction the noise levels would increase by approximately 4.0 to 12.0 dBA as shown in the draft EIS in Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations. This would be a perceptible change in sound levels as shown in Table 4.82 Ambient, Construction, and Operational Noise Levels at Select Noise Receptors, that has been added to the final EIS. Those two factors together make it reasonable to conclude that the increase of 4 to 5 dBA would be noticeable to some users. The referenced sentence has been deleted from the final EIS.
236	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 First full paragraph, fifth sentence. Change "would" to "could potentially".	Section 4.14.1 Special Designations Analysis Area and Analysis Assumptions of the draft EIS states that "Impacts from noise are evaluated in terms of whether they would increase the ambient noise environment, and thus impact a visitor's recreation experience." During construction the noise levels would increase by approximately 4.0 dBA to 12.0 dBA as shown in the draft EIS in Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations. This would be a percept ble change in sound levels as shown in Table 4.82 Ambient, Construction, and Operational Noise Levels at Select Noise Receptors, that has been added to the final EIS.
237	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 First full paragraph, sixth sentence. Change both "would" with "could potentially".	In the draft EIS Section 3.19.4.1 Migratory Birds, Raptors, and Game Birds describes that there are one or more species of wildlife that use the Project Area to forage. In the draft EIS Section 4.19.4.2.2. Buckeye Hills–Sonoran Desert National Monument Linkage notes that "Highly mobile species, such as bighorn sheep, mule deer, mountain lion, and Sonoran desert tortoise, can move long distances to access suitable breeding or foraging sites. They rely on linkages to connect large blocks of suitable habitat. For highly mobile species, the Proposed Action would create a barrier to wildlife movement patterns." Based on that information this impact can be reasonably expected and therefore the BLM has not made the suggested wording change.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
238	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 2nd P This paragraph states that, per Chapter 4, noise levels would increase by 4 to 5 dB above the ambient at the noise-sensitive receptors near the SDNM and wilderness areas. This statement is incorrect. First, there is no mention of 4 to 5 dB anywhere in Chapter 4, except in this paragraph, so it's unclear where these figures came from? Secondly, there is no table or comparative analysis provided in Chapter 4 to show the increases to the noise environment at any locations in any wilderness areas. The closest thing to such a presentation is Table 4.45 on page 4-87, but this table does not document the future total noise levels (and, thus, changes to the existing ambient); simply the ambient-only, the construction-only, and the operations-only. Third, nowhere in the DEIS have the SDNM or any other wilderness area been established as a noise-sensitive receptors; except by the author's presumption. Lastly, it is unclear where the range of 25 to 50 dBA for the existing ambient came from? Such data is nowhere in Section 3.9.	The 4 to 5 dBA represents the increase between the ambient and construction noise levels for receptor LT-3 (Sonoran Desert National Monument) as shown in the draft EIS in Table 4.45 Ambient, Construction, and Operational Noise Levels at Select Noise Monitoring Stations. Table 4.82 has been added to the final EIS in Section 4.14 Special Designations to show the comparison between ambient, construction, and operational noise levels for the four noise receptors near or in the recreational areas. In addition, text has been added to the final EIS in Section 4.14.3 Special Designations Proposed Action to note that the increase in noise levels at receptor ST-3 (North Maricopa Mountains Wilderness) from ambient to construction noise levels would be approximately 12.0 dBA. In addition, the term "noise-sensitive receptors" has been changed to "noise receptors" in the final EIS where appropriate. Finally, the 25–50 dBA discussed as the range of ambient noise levels has been removed from the final EIS.
240	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 2nd P As mentioned in the next to last comment above, there is NO mention of 4 to 5 dB anywhere in Chapter 4, yet such a difference to the existing ambient is herein stated as being an increase that would be noticeable. Where are increases to ambient, of any magnitude, discussed in the DEIS with respect to being audible, discernible, objectionable, or any other qualifier? Can the author of this section make the case that this range of noise levels (not mentioned anywhere else in the DEIS) would be noticeable?	The following assumptions have been added to the final EIS in Sections 4.9 Noise, 4.11 Recreation and Wilderness Characteristics, and 4.14 Special Designations to clarify the perception of sound levels: "An increase of 1–2 dBA in sound levels is a nonpercept ble change to the human ear. An increase of 3–4 dBA may or may not be distinguishable in an outdoor environment. A 5-dBA increase or greater is a perceptible change and is clearly discernible in an outdoor environment (ASHRAE1989)."
242	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 2nd P The topic of this paragraph starts talking about noise effects, then abruptly shifts to a discussion of impacts to wildlife from construction and operations-related traffic. This latter discussion should be in a separate paragraph of merged with the following paragraph.	The suggested changes have been made in the final EIS.
243	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Second full paragraph, third sentence. Change "would" to "could potentially".	Section 3.19.4.1 Migratory Birds, Raptors, and Game Birds of the draft EIS describes that there are one or more species of wildlife that use the Project Area to forage. Section 4.19.4.2.2. Buckeye Hills–Sonoran Desert National Monument Linkage notes that "Highly mobile species, such as bighorn sheep, mule deer, mountain lion, and Sonoran desert tortoise, can move long distances to access suitable breeding or foraging sites. They rely on linkages to connect large blocks of suitable habitat. For highly mobile species, the Proposed Action would create a barrier to wildlife movement patterns." Based on that information this impact can be reasonably expected. However, the text has been revised in the final EIS to clarify that the impact is in the form of an increased risk and is not a certainty in all circumstances.
244	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Second full paragraph, fifth sentence. Change "would" to "could potentially".	This is a duplicate comment and has been responded to in the recreation section.
245	143-B	SD-1	General Comment	pg 4-119 Section 4.14.3 Second full paragraph, last sentence. Change "would" to "could potentially".	The BLM declines to make the change because it was established in the draft EIS in Chapter 4.15 Transportation and Traffic that there would be an additional 1,000 vehicle trips on SR 85 during construction of the SSEP. SR 85 is the main southbound access route to the Buckeye Hills Regional Park, the North Maricopa Mountains Wilderness Area, and the Sonoran Desert National Monument. Delays on SR 85 southbound during this time would be greater than 120 seconds per vehicle and the LOS ranking would be an "F" LOS Ranking (> 50 seconds/vehicle) as a result.
246	143-B	SD-1	General Comment	pg 4-119 Section 4.14.4 Last sentence. Replace "would" with "could potentially".	Section 4.11. 1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources. As an example of one impact to wildlife from the proposed project it has been established in Chapter 3 Wildlife that there are one or more species of wildlife that use the Project Area to forage. Chapter 4 Wildlife notes that "Highly mobile species, such as bighorn sheep, mule deer, mountain lion, and Sonoran desert tortoise, can move long distances to access suitable breeding or foraging sites. They rely on linkages to connect large blocks of suitable habitat. For highly mobile species, the Proposed Action would create a barrier to wildlife movement patterns" and "Road construction, improvements, and use can result in direct impacts to wildlife individuals (such as collisions between wildlife and vehicles), resulting in wildlife mortality." Based on the preceding information this impact can reasonably be expected to occur and therefore the BLM declines to make the suggested wording change.
247	143-B	SD-1	General Comment	pg 4-120 Section 4.14.6 First sentence. As stated in other comments, the site's characterization as "a natural setting" is questionable.	The term "natural setting" as used in this sentence applies to the Project Area only because it is undeveloped. The wording has been revised in the final EIS to state that "…approximately 3,600 acres **of the Project Area** would be converted…" to clarify that the area being referred to is the Project Area.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
248	143-B	SD-1	General Comment	pg 4-120 Section 4.14.6 Last sentence. Change "would" to "could potentially".	Section 4.11. 1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources. As an example of one impact to wildlife from the proposed project it has been established in Chapter 3 Wildlife that there are one or more species of wildlife that use the Project Area to forage. Chapter 4 Wildlife notes that "Highly mobile species, such as bighorn sheep, mule deer, mountain lion, and Sonoran desert tortoise, can move long distances to access suitable breeding or foraging sites. They rely on linkages to connect large blocks of suitable habitat. For highly mobile species, the Proposed Action would create a barrier to wildlife movement patterns" and "Road construction, improvements, and use can result in direct impacts to wildlife individuals (such as collisions between wildlife and vehicles), resulting in wildlife mortality." Based on the preceding information this impact can reasonably be expected to occur and therefore the BLM declines to make the suggested wording change.
249	143-B	SD-1	General Comment	pg 4-120 Section 4.14.6 Last sentence. Sentence needs a period.	This error has been corrected in the final EIS.
250	143-B	SD-1	General Comment	pg 4-120 Section 4.14.7 4 There is a presumed conclusion that noise impacts exist, inferred by the text to be on wildlife resources. There is mention made that there are additional mitigation measures needed for said impact, but no additional mitigation measures are discussed in section 4.19 (which is only referenced as "in those respective sections", without numbering). Further, inspection of 4.19 on wildlife impacts only discusses unsubstantiated impacts to wildlife regarding increased stress levels (page 4-176, 4-178, and 4-179), reduced fitness of individual animals (page 4-177), reduced population health (page 4-177), increased wildlife displacement (page 4-178 and 4-182), and habitat degradation (page 4-184). See additional comments on Section 4.19 below.	A paragraph explaining the assumption that noise affects wildlife behavior proportionate to the volume and duration of the sound has been added to Section 4.19.1 (Analysis Area and Assumptions) of the final EIS. Because it is difficult to measure and compare wildlife stress levels pre- and post-construction, a discussion of measurements is not provided in the draft EIS or final EIS. A discussion of studies regarding the effects of elevated stress levels due to road construction, maintenance, and traffic volume has been added to Section 4.19.2.2 Wildlife-Proposed Action of the final EIS. The text has been revised in the final EIS to state that "Additional measures to mitigate visual impacts can be found in Section 4.17 (Visual Resources)." There are no potential mitigation measures for noise; therefore this reference has been deleted in the final EIS.
251	143-B	SD-1	General Comment	pg 4-120 Section 4.14.8 2-Jan Noise impacts are referenced as being discussed in Section 3.9. A better reference of impact discussions should be Section 4.9 as 3.9 focuses on the affected environment. However, even Section 4.9 does not fully and completely discuss noise impacts.	The final EIS has been corrected in Section 4.14.10 Residual Impacts to reference the appropriate Sections 4.9 Noise and 4.17 Visual Impacts. Section 4.9 has been revised in the final EIS to include more information on impacts from noise and clarifications on human perception of sound levels.
252	143-B	SD-1	General Comment	pg 4-120 Section 4.14.9 First sentence. Change "would" to "could potentially".	Section 4.11.1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources. Chapter 3 Wildlife states that there are one or more species of wildlife that use the Project Area to forage. Chapter 4 Wildlife notes that "Highly mobile species, such as bighorn sheep, mule deer, mountain lion, and Sonoran desert tortoise, can move long distances to access suitable breeding or foraging sites. They rely on linkages to connect large blocks of suitable habitat. For highly mobile species, the Proposed Action would create a barrier to wildlife movement patterns" and "Road construction, improvements, and use can result in direct impacts to wildlife individuals (such as collisions between wildlife and vehicles), resulting in wildlife mortality." Finally, loss of habitat is described in Section 4.16 Vegetation where it is noted that 3,700 acres would be cleared for the project. Based on the preceding information the impacts described can be reasonably expected to occur and therefore the BLM declines to make the suggested wording change.
253	143-B	SD-1	General Comment	pg 4-120 Section 4.14.9 Last sentence. Change "would" to "could potentially".	Section 4.11.1 Recreation and Wilderness Characteristics Analysis Assumptions states that "It is assumed for this analysis that the greater the degree of contrast, the more visible the SSEP will be on the landscape, and the greater the impact to the recreational activities, settings, and experiences." Strong contrasts would occur from KOPs 2 and 6 (Sonoran Desert National Monument) as noted in Section 4.17 Visual Resources. Therefore, this impact can be reasonably expected to occur and the BLM has not revised the final EIS to incorporate the suggested change.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
254	143-B	SD-1	General Comment	pg 4-120 Section 4.14.10 Last sentence. Change first "would" to "could potentially".	This sentence has been deleted from Section 4.14.12 Irreversible and Irretrievable Commitments of Resources of the final EIS because, upon further consideration, it was determined that the impacts to access would only occur during the 39-month construction period, not during the subsequent operational period. A sentence has been added to the final EIS in Section 4.14.11 Short-term Uses versus Long-term Productivity to note that implementation of the SSEP would create short-term changes to access during the construction period because of the increase in the number of vehicles traveling in the area.
57	150-O	SD-1	General Comment	From Attachment A, scoping letter: The site does not contain any officially designated sensitive and protected areas such as Areas of Critical Environmental Concern, nor has been it been proposed by citizens for designation as wilderness.	The commenter is correct. There are no Areas of Critical Environmental Concern (ACECs) or proposed wilderness areas within the Project Area.
29	162-I	SD-1	General Comment	The maps at the end of the document seem to subtly minimize the existence and proximity of both SDNM and the North Maricopa Wilderness. Also, there seems to be no actual map of the proposed Margie's Cove wilderness study area and its location relative to the project area. It sounds as though approval of this project would almost certainly kill this new proposed wilderness—why is this not analyzed or discussed?	Map 10 (Map 13 in the final EIS)–SSEP Project Area and land use and access analysis area in relation to existing land use and special designations, highlights both the Sonoran Desert National Monument and the North Maricopa Mountains Wilderness. In addition, they are both included as part of the map legend. Other maps for the draft EIS may not include the Sonoran Desert National Monument and North Maricopa Mountains Wilderness because they are specific to other resources and resource uses. As noted in the draft EIS in Section 4.11, "An area in the northwest corner of Sonoran Desert National Monument, north of Margie's Cove, has been submitted to BLM for consideration of its wilderness characteristics in the current RMP revision. Management of the area is being analyzed under alternatives in the draft RMP, and has yet to be decided. For the purposes of this EIS analysis, it is not known if this area has wilderness characteristics as defined in the Wilderness Act of 1964 (Public Law [P.L.] 88-577), but the EIS has analyzed the effects of construction and operation of the SSEP on those potential characteristics in Section 4.11.3.1 Wilderness Characteristics." The text has been revised in this section of the final EIS to clarify that the area considered is the area north of Margie's Cove.
3	137-T	SD-2	Proximity to Designated Wilderness Area	The proposed Sonoran Solar Energy Project is located in close proximity to the Sonoran Desert National Monument, the North Maricopa Wilderness Area And the Sierra Estrella Wilderness. This project will have an adverse effect on these protected lands.	Impacts to the Sonoran Desert National Monument, the North Maricopa Wilderness Area, and the Sierra Estrella Wilderness from the project are disclosed in the draft EIS in Sections 4.14 Special Designations and 4.11 Recreation and Wilderness Characteristics.
221	143-B	SD-4	Sierra Estrella Wilderness	pg 4-118 Section 4.14.3 10 Although the stated 10 mile distance from the SSEP site to the Sierra Estrella Wilderness (SEW) is accurate, it is only true of the very eastern tip of the SSEP and the very western tip of the SEW. From the center of the SSEP (between the two power blocks) to the center of the SEW is more on the order 16 to 17 miles in distance….a big difference both with respect to noise and visual aspects of the Project.	The statement has been revised in the final EIS to state, "However, because the western tip of the Sierra Estrella wilderness is 10 miles to the east of the eastern boundary of the proposed SSEP, this distance would reduce the effects on the view, and it is expected that the project facility would not stand out from the existing development in the area."
239	143-B	SD-4	Sierra Estrella Wilderness	pg 4-119 Section 4.14.3 2ndP In section 4.11.3 on page 4-86, the Sierra Estrella Wilderness is lumped in with all other wilderness areas as recreational uses that would be affected by noise. (As commented to above, this assertion is unfounded). In this section, however, the author correctly states that it is not expected that a visitor in the SEW would hear noise from SSEP due to the large distances involved. So would there be an affect/impact (per 4.11.3) or would there not be an affect/impact (per 4.14.3)?	The "Sierra Estrella Wilderness" is not referenced as being affected by noise in Section 4.11.3 of the draft EIS. The text of the final EIS has been revised to clarify that it is not expected that a visitor would hear the noise from the project facility in the Sierra Estrella Wilderness due to the distance between the two.
1	122-I	SD-5	Sonoran Desert National Monument	About a month ago, I decided to hike in the Margie's Cove area of the Sonoran Desert National Monument. I had read in the newspaper that the area had been closed to off-highway vehicles, but was still open to hikers. To my dismay, I found the two access points with which I am familiar had been blocked with new and very durable fences. There were no gates, signs, or parking for hikers -- the access points were obliterated. I'm all for protecting the land, but I think this is a little extreme -- ESPECIALLY WHEN THE BLM IS PLANNING ON LAYING WASTE TO VAST RIGHTS OF WAY A FEW MILES TO THE NORTH!!! Is the BLM really trying to protect this land, or are they merely hiding a massive solar power land giveaway?	There is no relationship between the Sonoran Solar Energy Project and recent changes to access points for the Sonoran Desert National Monument. For questions about access to Sonoran Desert National Monument please contact David Scarbrough at (623) 580-5651.
241	143-B	SD-5	Sonoran Desert National Monument	pg 4-119 Section 4.14.3 2nd P The author correctly states that the further (sic) a wilderness area visitor moves into the recreational area, the more the SSEP sound will fade. However, the next sentence indicates that such a movement deeper into the SDNM or NMMW would, in and of itself, be an adverse impact to some visitors. On what basis does moving around in a wilderness area constitute an adverse impact?	The statement "The analysis assumes that the greater the distance the recreationist has to travel to get away from the sound, the greater the impact to the recreational experience" has been deleted in the final EIS. As stated in the draft EIS in Section 4.14.1 Special Designations Analysis Area and Assumptions, "impacts from noise are evaluated in terms of whether they would increase the ambient noise environment, and thus impact a visitor's recreation experience." Based on this assumption and the fact that there would be increases in noise levels at two or more of the noise receptors near recreation areas, it is appropriate to state for this analysis that "this would cause adverse impacts to the recreational setting and experience for some visitors."

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	162-I	SD-5	Sonoran Desert National Monument	While the proposed location may meet a number of helpful criteria for the project proponent (specifically, it saves this private company a lot of money at public expense), it would seriously and permanently adversely affect the environment of the Sonoran Desert National Monument (SDNM), a truly unique and irreplaceable national treasure, and its environs	Impacts to the Sonoran Desert National Monument from the SSEP are disclosed in Sections 4.11 Recreation and Wilderness Characteristics, 4.14 Special Designations, and 4.17 Visual Resources of the draft EIS.
4	162-I	SD-5	Sonoran Desert National Monument	The document's analysis pointedly and deceptively minimizes and trivializes the significant environmental impact of the project's location in extremely close proximity to the SDNM, a unit of the BLM's National Landscape Conservation System. The National Landscape Conservation System is a collection of many of "crown jewels," the most special places under BLM administration.	The commenter does not state how the document's analysis "pointedly and deceptively minimizes and trivializes the significant environmental impact of the project's location." The direct and indirect impacts of the SSEP to the Sonoran Desert National Monument are disclosed in Sections 4.11 Recreation and Wilderness Characteristics, 4.14 Special Designations, and 4.17 Visual Resources of the draft EIS. The analysis includes visual contrast ratings to disclose the changes in the viewshed, discussions of impacts to recreational uses and experience, changes to levels of service for travel and access, and predicted noise increases during construction. In addition, Chapter 4.19 discloses the impacts to Sonoran Desert National Monument's wildlife that forage in and migrate to the Project Area.
10	162-I	SD-5	Sonoran Desert National Monument	It is important to note that this is an industrial facility that once built, will irrevocably and permanently alter both the project area and its surrounding region. The idea behind "industrial parks" is to segregate industry from residential, recreational, and other sensitive areas. Think of the current project as the first tenant in a new industrial park, situated immediately adjacent to a National Monument (indeed, it is likely that once this project is built, the proponent will likely try to expand it at some future date based on the history of this project). This is an incompatible use for the immediate area surrounding the SDNM, and violates both common sense and basic community planning principles. Special places, l ke National Monuments (as well as Wilderness Areas), should be buffered and protected from nearby incompatible activities and uses that may devalue and/or degrade that special place due to air quality, view-shed, habitat fragmentation, or other issues.	The FLPMA directs BLM to manage public lands for multiple use and sustained yield (Section 102[a][7]). As a multiple-use agency, the BLM is required to implement laws, regulations, and policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. Although the BLM manages some areas, such as the Sonoran Desert National Monument and the North Maricopa Mountains Wilderness, as closed to surface disturbance, the SSEP is proposed for development on lands that are open to energy development. Section 1.6.1 of the draft EIS notes that the Proposed Action would not conflict with applicable BLM land use plans.
13	162-I	SD-5	Sonoran Desert National Monument	There is only one Sonoran Desert National Monument, and there is nothing like this Monument anywhere else on the planet. You cannot engineer and build a new Monument. It is unique and deserves to be protected.	Thank you for your comment.
17	162-I	SD-5	Sonoran Desert National Monument	The government has a responsibility to protect unique resources like SDNM and the BLM needs to step up to the plate and fulfill that responsibility. No one else is going to do it. Private land is history out there, but BLM has the authority to protect the Commons, the part that's out there belongs to all of us, not just some private company out to make a profit.	Thank you for your comment.
18	162-I	SD-5	Sonoran Desert National Monument	It is troubling that for ten years the BLM has failed repeatedly to create any kind of permanent long-term management plan to protect SDNM, yet seems to have no issue with devoting substantial resources to effectively slam-dunk a project on the Monument's boundary which would permanently and irrevocably impact the Monument and its surrounding area.	A long-term management plan for the Sonoran Desert National Monument is out of the scope of the federal decision to be made on the proposal considered in the EIS. As noted in the draft EIS at Section 1.4.1 The EIS Decision Framework, only after BLM reviews public comment on the draft EIS and the final EIS is prepared will the BLM make the decision on whether or not to approve the project. As noted in Section 1.4.2 of the draft EIS, only in the ROD will the BLM determine whether to select the Proposed Action or an alternative or deny the ROW request, determine conformance with applicable land and resource management plans, and select appropriate terms and conditions. Lastly, please see Section 2.5.5 Termination and Reclamation of the draft EIS and final EIS, which describes the requirements for site reclamation following the life of the project.
19	162-I	SD-5	Sonoran Desert National Monument	The BLM has failed to implement baseline scientific studies of the monument and its resources, so even if the current project is approved and change occurs, BLM won't know it because it does not have an established baseline from which to measure any changes. On this basis alone, the project may not be built at this location because there is currently is no way to monitor change should it occur. And should change occur, the facility would already be built, the land permanently altered, and there would be no way to mitigate the changes. Then it would be too late.	Baseline conditions for each resource and resource use are described in Chapter 3 Affected Environment of the draft EIS. Scientific studies were incorporated into the analysis as appropriate (please see references for each Section in the draft EIS and final EIS). The impacts or changes to the resource or resource uses from the Proposed Action and alternatives are described in Chapter 4.
20	162-I	SD-5	Sonoran Desert National Monument	Other issues with the DEIS include the fact that there is no study and analysis of what long-term impact the further fragmentation of habitat at that location will have on Monument resources and surrounding public lands.	Section 4.19 Wildlife (p. 4-179) of the draft EIS discusses impacts to wildlife movement and habitat. In addition, Section 4.19.4 Wildlife Linkages of the draft EIS discusses impacts to wildlife linkages, including the Gila Bend-Sonoran Desert National Monument linkage.
26	162-I	SD-5	Sonoran Desert National Monument	The document admits that the project would contribute to the further development of the area. This means that the BLM would be contributing to the degradation of its own "crown jewel" (SDNM) should the project be allowed to proceed at this location. Death by a thousand cuts is what it's called.	Thank you for your comment.
31	162-I	SD-5	Sonoran Desert National Monument	The current project is incompatible with the nearby SDNM, the nearby Wilderness, and the nearby wilderness study area, and it represents an irrevers ble and irretrievable commitment of public resources.	Impacts to the Sonoran Desert National Monument and other specially designated lands are described in Section 4.14 Special Designations of the draft EIS. Please see Section 4.14.10 of the draft EIS, which discloses irreversible and irretrievable commitments of [special designation] resources. This section notes that because the Project Area would be reclaimed, there would be no irrevers ble commitments of resources, but that several impacts would be irretrievable until the site is reclaimed.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
32	162-I	SD-5	Sonoran Desert National Monument	There is no feas ble way to mitigate the impact of this large industrial facility's direct and indirect impacts to one of America's unique national treasures. Once the facility is built, there is no way that the land can ever be restored—there is no record of a parcel of Sonoran Desert habitat of this size having ever been successfully restored to its original pristine state.	Impacts to the Sonoran Desert National Monument and other specially designated lands are described in Section 4.14 Special Designations of the draft EIS. Please see Section 4.14.10 of the draft EIS, which discloses irreversible and irretrievable commitments of [special designation] resources. This section notes that because the Project Area would be reclaimed, there would be no irrevers ble commitments of resources, but that several impacts would be irretrievable until the site is reclaimed. Section 2.5.5 Termination and Reclamation of the draft EIS and final EIS describes the requirements for site reclamation following the life of the project.
4	74-I	SOC-1	General Comment	I expect that this new transmission line does not adversely affect the quality of life of nearby residents.	Thank you for your comment.
6	106-I	SOC-1	General Comment	Providing solar-generated electricity to the nation could put AZ in the BLACK, let's go for it!	Thank you for your comment.
2	127-I	SOC-1	General Comment	Will the killowatts cause, affect or hinder any domestic, residential transmission?	The proposed project is intended to improve the production and transmission of renewable energy under the Energy Policy Act of 2005 and the BLM's Solar Energy Development Policy. The proposed construction and operations management practices (see Section 2.5 of the draft EIS) discloses how the energy will be produced and delivered to the grid.
212	143-B	SOC-1	General Comment	pg 4-90 Section 4.12 BLM would receive some type of rental/ROW payment for the lands. This is not mentioned in this section.	Section 4.12.4.2.2 of the draft EIS states that "The BLM would also charge for the lease of the land, although the lease rates have not yet been determined." This section has been updated in the final EIS to incorporate information regarding BLM rates for solar power-generating facilities.
213	143-B	SOC-1	General Comment	pg 4-98 Section 4.12.2.2.4 last This sentence states that a school (which is always treated as a noise-sensitive receptor in an impact assessment) at 10 miles from the SSEP site would not be affected by Project noise. Yet Section 4.11.3 states that a recreational area (almost never treated as a noise-sensitive receptor and not established as one in this DEIS) that is from 12 to 16+ miles from the main Project noise sources would be affected by noise. Inconsistent in the treatment of very long-range noise propagation and the associated potential effects.	This inconsistency regarding long-range noise propagation has been updated in the final EIS Sections 4.12.2.2.4 and 4.11.3.
214	143-B	SOC-1	General Comment	pg 4-99 Section 4.12.2.2.5 2ndP This is mostly a restatement of the comments found in Section 4.9.9 on page 4-83. See the above comments on that section. Neither the Tech Report nor this DEIS established that noise levels from construction would increase the ambient conditions up to 2 miles from the SSEP. A quick review of the Tech Report data and analyses suggests that this statement is incorrect or, at the very least, needs additional explanation and qualification. In the correct context of the referenced 4.9.3.1, the appropriate distance is 0.5 miles that noise may be clearly audible or even annoying to residential receptors east of the Project site.	This inconsistency regarding quality of life impacts from construction noise levels has been updated in Section 4.9.3.1 and 4.12.2.2.5.
215	143-B	SOC-1	General Comment	pg 4-99+ Section 4.12.2.2.5 3rdP This is mostly a restatement of the conclusions found in Section 4.11.3 on page 4-86. See the above comments on that section about the unsubstantiated and incorrect assessment relative to noise in recreational areas.	This inconsistency regarding quality of life impacts from construction noise levels has been updated to be consistent with the information in 4.11.3.
216	143-B	SOC-1	General Comment	pg 4-100 Section 4.12.2.2.5 Ops This sub-section is generally talking about how SSEP operations, including noise, would change the "identification with the area", the "self perception", and the "quality of life" for residents and visitors to the area. In that context, the towns of Goodyear and Buckeye are categorized as rural communities. While there are many parts of Goodyear and Buckeye, particularly their respective planning zones, that certainly can be labeled as 'rural', there are also significant portions of those communities that would better be cast as suburban and part of the overall Phoenix metro area. To simply categorized Goodyear and Buckeye as rural communities only gives half the picture of what is going on regarding estimated effects on the quality of life for residents of those communities.	Section 4.12.2.2.5 of the draft EIS generally refers to Goodyear and Buckeye as "rural and moderately developed." Also, in the final EIS the last sentence of this section has been modified to add "and moderately developed" after "rural." Although these communities, particularly in their town centers, are moderately developed, they are not generally considered suburbs of Phoenix.
1	125-I	SOC-2	Job Creation	How many construction and full time jobs will be created?	See Section 4.12.2 of the draft EIS for construction and operations employment projections.
15	139-G	SOC-2	Job Creation	Town of Buckeye elected officials also believe that any job fairs or employment recruitment activities need to be conducted within the Town. It is important that the as many employment opportunities at the SSEP, both during the construction phase as well as permanent positions, be filled by the local labor force.	The workforce for the SSEP is expected to be filled by the labor supply in Maricopa County and the Phoenix MSA, as stated in 4.12.2.2.1 of the draft EIS. How the project proponent chooses to hire for these positions is out of scope of this EIS because hiring and job fair decisions are not within BLM's decision space for this project.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
217	143-B	SOC-3	Environmental Justice	pg 4-109 Section 4.12.5 , all This section, and by reference, Section 3.12.5 fail to properly put into real-world context the extent of potential EJ impacts as they only deal with Census Blocks and percentages of population, rather than detailing in the DEIS how many residential households are within a certain distance from the SSEP boundary. If that information was disclosed, the reader would have a better viewpoint of how many homes may be affected by noise (estimated to be on the order of two-dozen or less). By casting the EJ discussion in terms of census blocks within 5 miles of the Project Area, the typical reader may tend to fill in the blanks and think that hundreds, if not thousands, of people are potentially being affected. Potential noise affects impacts would only be to a handful of residences.	In the final EIS Section 4.12.5 has been updated to reflect the populations of the census blocks within 5 miles of the Project Area.
218	143-B	SOC-3	Environmental Justice	pg 4-109 Section 4.12.5.2 This section draws on the inferred/implied (although unstated) noise impacts from Section 4.9 (see comments above). However, Section 4.9 never established that there would be noise impacts. This text and Table 4.56 are not supported by the presentation on noise in the previous portions of the DEIS.	This inconsistency regarding environmental justice impacts from noise levels has been updated in the Final EIS in Sections 4.9 and 4.12.
219	143-B	SOC-3	Environmental Justice	pg 4-110 Table 4.56 The conclusion of adverse impacts regarding noise in this table is not supported by the presentation on noise in the previous portions of the DEIS; particularly Section 4.9.	This inconsistency regarding environmental justice impacts from noise levels has been updated in the final EIS in Sections 4.9 and 4.12..
19	145-G	SOC-4	Cost of Project	pg 4-108. The capital costs of the project would probably be $1.45B. What would the expected operations and maintenance costs be?	Section 4.12.4.2.2 of the draft EIS discusses estimated annual operations and maintenance costs.
37	148-G	SOC-4	Cost of Project	The DEIS has not summarized information on the relative costs of the project, such as equipment costs, labor, loan rates, or an expected rate of return. Without an understanding of this type of information, BLM should not agree that effective and reasonable mitigation measures or combined alternatives are ruled out on the basis of cost.	The projected costs of the construction and operation of the SSEP (including equipment and labor costs) are provided in Section 4.12.4.2.1 of the draft EIS. Additional information on the relative capital costs of various technologies has also been added to Section 2.11 and Table 2.15 of the final EIS. In addition, as documented in Chapters 2 and 5 of the draft EIS and final EIS, BLM has incorporated all feasible alternatives and suggested mitigation measures that were identified in scoping and during public comment.
2	4-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	Property devaluation is reported by the project to be 15% when it is completed. Property values are already compromised by the economy and this is an additional factor that will hurt homeowners in the area.	Thank you for your comment.
9	4-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	Property owners will not have the funds to dig additional wells to sustain their homes. Certificate of Occupancy will depend on water being available to the homes.	Groundwater drawdown impacts are disclosed in Section 4.18.2 of the draft EIS. Appendices F and G disclose the amount of groundwater drawdown by well. Further, the project proponent must meet the ADWR well spacing requirements of A.A.C. Section R12-15-1302 and meet industrial use-type permit stipulations, as stated in Sections 1.6.4 and 4.18.2.3 in the draft EIS. Information has also been added to the final EIS in Section 4.18.2.3.1 that provides context on impacts to well users near the Project Area.
4	8-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	My property value will decline by 15% - What can be done to help the landowners near the project area.	Section 4.12.2.2.3 of the final EIS has been updated with property value impact-related data recently released in the Draft Programmatic EIS for Solar Energy Development in Six Southwestern States. No compensation is being offered to landholders in the area; such compensation is outside the jurisdiction of the BLM.
1	130-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	I am concerned about the impact a project of this scale will have on my land value. Can you tell me if there is any compensation being offered to land holders in the area. For example discounted power, etc.	Section 4.12.2.2.3 of the final EIS has been updated with property value impact-related data recently released in the Draft Programmatic EIS for Solar Energy Development in Six Southwestern States. No compensation is being offered to landholders in the area; such compensation is outside the jurisdiction of the BLM.
2	134-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	In the event any water is drawn from the aquifer please set up a bond that will provide the full cost of drilling a new well at a depth equal to the Sonoran Project in the event our water is sucked dry.	Groundwater drawdown impacts are disclosed in Section 4.18.2. Appendices F and G of the final EIS disclose the amount of groundwater drawdown by well. Further, the project proponent must meet the ADWR well spacing requirements of A.A.C. Section R12-15-1302 and meet industrial use–type permit stipulations, as stated in Sections 1.6.4 and 4.18.2.3 in the draft EIS. Information has also been added to the final EIS in Section 4.18.2.3.1 that provides context on impacts to well users near the Project Area.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	134-I	SOC-5	Value of Nearby Homes/Certif occupancy/cost of new wells	Please provide a written guarantee to me a homeowner that I could give a potential buyer of my home an accurate disclosure on water availability and quality/	Providing a guarantee of water availability is outside of the BLM's jurisdiction. Appendices F and G of the final EIS have been updated with a complete list of wells surrounding the project that would be impacted by water withdrawals. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot, after 5 years, and 30 years. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
20	145-G	SOC-6	Tax Revenue and Incentives	Is there a potential of partnering with utility companies to obtain federal and state energy and tax credits	Partnerships between the project proponent and utility companies are beyond the scope of this EIS. As a result of this EIS the BLM will decide whether or not to grant a right-of-way for the project and, if granted, under what conditions.
64	150-O	SOI-1	General Comment	From Attachment A, scoping letter: Impacts to soil resources are one of the most challenging issues for solar projects proposed in the desert. As seen in the ongoing permitting process for the proposed Ivanpah Solar Energy Generating System in California, development of adequate drainage, erosion, and sediment control plans is a complicated, time consuming, and challenging task. Desert soils are particularly fragile and development can have significant impact on the cryptogrammic crust, which is primarily made up of cyanobacteria, mosses, and lichens. When these soils are disturbed, the desert land generates more dust and the area is more susceptible to invasive plant species. To ensure robust environmental protections and timely completion of permitting documents and steps, it is critical that both the project applicant, NextEra, and the BLM dedicate adequate time and resources early in the process to addressing these issues thoroughly. Recommendation: The DEIS should include a thorough analysis of the impacts on the soils, including any biological soil crusts, as well as the potential for introducing non-native invasive plant species. An alternative that limits the impacts relative to these issues should be developed. Both the applicant and the BLM should dedicate adequate time and resources early in the process to addressing soil resources issues adequately, including through the preparation of a detailed drainage, erosion and sediment control plan that addresses these potential impacts and provides mitigation measures that will render these hazards to a level less than significant.	Thank you for your comment. Impacts to soil resources and related to invasive and noxious plant species are discussed in the draft EIS in Sections 4.13 and 4.16, respectively. The reduced footprint alternative (Alternative B) that was analyzed in detail in the draft EIS partially addresses soil and invasive and noxious plant species concerns by reducing the overall level of ground disturbance compared to the Proposed Action. Finally, a photovoltaic alternative is analyzed in detail in the final EIS as a sub-alternative to the reduced water use alternative. This alternative has a smaller footprint than Alternative B and therefore would further reduce impacts related to soils and invasive and noxious plant species compared to the Proposed Action. The draft EIS, at Table 2.1, describes the applicant-committed environmental protection plans that address the potential impacts to drainage, erosion, and sedimentation. In addition, these potential impacts were minimized through project design features, as described in draft EIS Section 2.5.2.8, On-site Drainage and Discharge Facilities, and Section 2.5.3.3, Civil Works Construction Sequence; Site Drainage.
21	162-I	SOI-1	General Comment	The document fails to clearly explain that the project area will be effectively sterilized. Herbicide use is not quantified, and there is no evidence of a soil chemical treatment plan.	Thank you for your comment. Impacts to soil resources are disclosed in Section 4.13 of the draft EIS. Section 4.13 of the final EIS has been updated to include discussion of impacts to soils related to herbicide applications. The maximum estimated use of herbicides has been quantified in Section 4.6 Hazardous Materials and Hazardous and Solid Waste of the final EIS. Finally, Section 4.13.9 (Potential Mitigation Measures [for Soils]) has been revised to add the following mitigation measure: "The applicant would prepare an approved herbicide use plan, or combine it with an integrated vegetation management plan, to ensure that all herbicides are safely applied at the minimum necessary level and that all products used are applied at a rate to minimize adverse impacts. This plan would be incorporated into the Plan of Development (POD)." Section 4.13.9 has also been revised to include these potential mitigation measures: • Use herbicides that specifically target noxious weeds and invasive plant species. • Avoid the use of herbicides that negatively affect biological soil crust organisms (i.e., those that target photosynthetic structures and functioning versus targeting roots and aboveground structures). • Apply herbicides only to target vegetation and not across the entire soil surface to allow biological soil crust organisms to develop on graded areas and enhance soil stabilization. Sections 1.4.2 and 2.3.1 of the final EIS explain the attachment of a POD to the ROD, including incorporation of all potential mitigation measures selected by BLM for inclusion.
22	162-I	SOI-5	General Comment	It is currently impossible to reclaim Sonoran Desert lands that have been bladed, compacted, treated for decades with herbicides, and treated with soil stabilizers. Soils that take millennia to form will be permanently altered, compacted, and destroyed. The soil disturbance here will be permanent.	Thank you for your comment. Impacts to soil resources are disclosed in Section 4.13 of the draft EIS.
2	38-I	TAC-1	General Comment	I would however have a requirement that the power be sold in AZ and not exported to CA since the land is AZ public land.	Consideration of where produced power would be sold is beyond the scope of the decision to be made by the BLM. As explained in Section 1.4.2 of the draft EIS, the BLM will decide whether or not to grant a ROW for the project and, if granted, under what conditions. The Arizona Corporation Commission is the respons ble decision-making body for how and where power is sold.
7	129-G	TAC-1	General Comment	Another option to help mitigate the impact on the groundwater supply would be to condition approval of any lease on the project utilizing an alternative water supply when it becomes available. If the pace of development returns to the levels seen prior to 2006 at some point over the next thirty years, there may be a sufficient amount of reclaimed water available within a reasonable distance for use by the project.	It would be inappropriate to condition approval of the SSEP on potential future alternative water supplies because the quantity and location of these water supplies is speculative. The applicant must comply with state regulations for groundwater use, as previously described in Section 1.6.4 and Table 1.5 of the draft EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
29	150-O	TAC-1	General Comment	In descr bing what terms and conditions will be required of NextEra, the DEIS only states that, in the ROD, the BLM Phoenix District Manager will determine "appropriate terms and conditions, if the ROW is approved." (p. 1-6). BLM should provide far greater certainty on what exactly these terms and conditions would be, so that NextEra and members of the public can determine exactly what will be required of NextEra should the ROW grant be approved and be assured that they are clear and enforceable. BLM should specify which mitigation measures will be required as terms and conditions in the ROD.	Section 2.3.1 of the draft EIS discusses permits, approvals, regulatory compliance, mitigation, and monitoring that applies to the Proposed Action and action alternatives. L kewise, Section 2.3.2 of the draft EIS discusses applicant-committed environmental protection measures that apply to all action alternatives considered in the draft EIS. The final EIS has been clarified to reflect that all of these measures would be incorporated into the ROD as terms and conditions of the ROW grant because impact analyses were completed assuming that they would be in place. Proposed mitigation measures are discussed following the impact analysis for each resource or use. Per 40 CFR 1505.2 and 1505.3 any proposed mitigation measures adopted as terms and conditions of the ROW grant will be clearly identified in the ROD. This point has been clarified in a new Section 2.3.4 Potential Mitigation Measures in the final EIS.
31	150-O	TAC-1	General Comment	BLM should provide certainty on the terms and conditions that will apply to SSEP and be incorporated in the ROD and ROW grant. This information should be included in the supplement to the DEIS recommended in section IV a. of these comments, as well as in the FEIS.	Per 40 CFR 1505.2 and 1505.3, any proposed mitigation measures adopted as terms and conditions of the ROW grant will be clearly identified in the ROD. This point has been clarified in a new Section 2.3.4 Potential Mitigation Measures in the final EIS.
14	139-G	TRA-1	General Comment	Implementing the use of a van pool system to minimize the traffic and subsequent air emission in the area should also be a prerequisite for approval.	Thank you for your comment. In Section 2.5.3.2 of the draft EIS, carpooling is discussed and it is assumed that some workers would carpool, but carpooling would not be required. The final EIS has been revised in Section 4.15.9 to include the addition of a potential mitigation measure implementing a carpooling system.
1	145-G	TRA-1	General Comment	The study references Jojoba Road and its intersection with SR 85. The state highway system does not include an intersection with a road of this name. From previous discussions with and the description within the DEIS, ADOT knows and signs the crossing at SR 85 as Riggs Road. From correspondence associated with an initial traffic impact analysis submitted on behalf of the Sonoran Solar project, the Maricopa County Department of Transportation also does not recognize Jojoba Road as a road in Maricopa County. From the context in the DEIS, we understand the report to use Jojoba Road as the name of the dirt access road along the section line. Please refer in the final environmental impact statement to the road connecting to SR 85 as Riggs Road so as to avoid confusing the public and to properly identify public roads.	Thank you for your comment. In the draft EIS, the traffic analysis referred to the intersection at SR 85 as Jojoba Road. The final EIS has been revised in all instances that mention "Jojoba Road at SR85" to "Riggs Road at SR-85."
6	145-G	TRA-1	General Comment	The DEIS should cite the following document for SR 85 access control: ADOT. Access Management Study; State Route 85, Interstate 9 to Interstate 10; State Business 08, Interstate 8 to State Route 85; Final Report. September 2005.	Thank you for your comment. This reference was incorporated into the final EIS in Section 3.15.
7	145-G	TRA-1	General Comment	A portion of the SSEP lies within the ongoing Arizona Department of Transportation's State Route (SR) 303L, Riggs Road to SR 801 (TRACS No. H7194) - Alternatives Selection study area. The study area is bounded on the west by the Dean Road section line and on the south by the Sonoran Desert National Monument. At this time it does not appear that the SSEP location will have any impacts on proposed alternatives for the SR 303L.	Thank you for your comment.
14	145-G	TRA-1	General Comment	Section 3.15.3 Existing Conditions: SR 85 is not totally a four-lane, rural, median-divided highway between Gila Bend (1-8) and 1-10. There are still portions that are two-lane, two-way roadway.	Thank you for your comment. The final EIS has been revised in Section 3.15.3 to reflect the two-lane status of certain portions of SR-85.
22	145-G	TRA-1	General Comment	page 4-121 Footnote 5 is unclear in meaning - A LOS of B=>10???	Thank you for your comment. In the final EIS the footnote in Section 4.15.2 has been revised to read: "LOS B indicates a 10-15 second traffic delay (see Table 3.47, Section 3.15.3.2)"
23	145-G	TRA-1	General Comment	Table 4.64 - What is the asterisk for in the title?	Thank you for your comment. The asterisk in the title corresponds to the table note. Table 4.64 has been revised in the final EIS to have a corresponding asterisk in the table note.
15	145-G	TRA-2	Methodology	Pgs. 3-89, 92, 93, 4-122 & 123 Tables 3.48, 3.49, 3.50, 4-62 & 4-63- For SR 85 Southbound Mainline/Jojoba Road, should there be Eastbound direction data as an Approach?	Thank you for your comment. Jojoba Road (Riggs Road as revised in the final EIS) eastbound approach is not analyzed due to an eastbound direction not being included as access to the site. No construction or operational access would occur on Riggs Road east of the Project Area except for in cases of emergency. This has been clarified in Section 2.5.2.10 Roads and Access of the final EIS.
4	4-I	TRA-3	Road Repair	1600 construction workers are expected to work on this project. Increase in traffic will be felt as the workers commute to and from the building site. These are rural roads and Riggs Road is a graded dirt road. While the project is encouraging employee traffic to be from the Rte 85 and Rte 8 entrance, they cannot mandate it. It will be a shorter commute for employees to use the Riggs Road, secondary access road. This will increase dust and will congest traffic patterns on rural roads as well as destroy the quality of these rural farm roads	Thank you for your comment. A new potential mitigation measure to address this concern has been added to Section 4.15.9 of the final EIS. Under this mitigation measure Boulevard would contractually require its construction contractors to access the construction site from SR-85 rather than other surface/local roads.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
5	4-I	TRA-3	Road Repair	1600 construction workers are expected to work on this project. Increase in traffic will be felt as the workers commute to and from the building site. These are rural roads and Riggs Road is a graded dirt road. While the project is encouraging employee traffic to be from the Rte 85 and Rte 8 entrance, they cannot mandate it. It will be a shorter commute for employees to use the Riggs Road, secondary access road. This will increase dust and will congest traffic patterns on rural roads as well as destroy the quality of these rural farm roads.	Thank you for your comment. A new potential mitigation measure to address this concern has been added (Section 4.15.9) of the final EIS. Under this mitigation measure Boulevard would contractually require its construction contractors to access the construction site from SR-85 rather than other surface/local roads.
1	124-I	TRA-3	Road Repair	I have concerns about further road damage due to construction.	Thank you for your comment. The final EIS has been revised to include information regarding road damage during construction in Sections 4.15.3, including the addition of a potential mitigation measure to reduce road damage. The potential mitigation measure would be to contractually obligate construction workers to exclusively use SR-85 from the west to access the Project Area, not Riggs Road from the east.
12	129-G	TRA-3	Road Repair	Although the primary access to the site will be from the west off of SR85 and will be paved, the DEIS indicates that there may be secondary access to the site from the east (Page 2-22). In Chapter 4 the DEIS states that a secondary access road will be built from the east from Riggs Road to access the well field (Page 4-70). It also notes that the existing Riggs Road would serve as secondary and emergency access to the Project Area and that it would be maintained or upgraded (if needed) and provide continued access to adjacent public lands (Page 4-127). Some of these statements appear to be conflicting. The DEIS should be revised to clearly indicate the intent regarding improvements to the secondary access to the project via Riggs Road.	Thank you for your comment. Section 2.5.2.10 Roads and Access of the final EIS has been revised to clarify that Riggs Road would be used only for emergency purposes and to sporadically access the well field, and would not be authorized as a secondary access point. In addition, a new potential mitigation measure to address this concern has been added to Section 4.15.93 of the final EIS. Under this mitigation measure Boulevard would contractually require its construction contractors to access the construction site from SR-85 to the west of the Project Area rather than other surface/local roads to the east of the Project Area.
5	134-I	TRA-3	Road Repair	Please repair the damage to our roads during construction.	Thank you for your comment. The final EIS has been revised to include information regarding road damage during construction in Sections 4.15.3, , including the addition of a potential mitigation measure to reduce road damage in Section 4.15.9, The potential mitigation measures would include contractually obligating construction workers to exclusively use SR-85 from the west to access the Project Area, and restore (or fund the restoration of) all public roads, easements, and rights-of-way damaged due to project-related construction activities to original or near-original condition in a timely manner, as directed by BLM. Potential repairs and restoration of roads may be required at any time during the construction phase of the project to assure safe ingress and egress to all vehicles.
24	145-G	TRA-3	Road Repair	Table 4.64 - How are 30 to 60 trucks per day translated into the peak hour? All off-peak?	Thank you for your comment. In the draft EIS, Section 4.15.3.1 states that 30 to 60 trucks per day would be required during nonpeak hours. To clarify, the following was added to the final EIS in Section 4.15.3.1: To analyze peak construction, it was assumed that 1,000 vehicles carrying construction workers would be driving to and from the Project Area each day during the typical AM and PM peak hours. Although most of the workers would be expected to arrive and depart during these peak hours, specialty workers would be expected to arrive on-site during nonpeak hours.
3	127-I	TRA-4	Traffic	I have concerns about the influx of construction workers and resulting traffic blocks.	Thank you for your comment. Please see Section 4.15 of the draft EIS for a description of transportation- and traffic-related impacts of the SSEP. Several potential mitigation measures have been included in the final EIS in Section 4.15.9, including the potential for: mandatory access points, van/carpools, and repairing any damage to existing roads.
13	129-G	TRA-4	Traffic	With the planned paving of the access road between SR85 to the project and upgrades to Riggs Road, an indirect impact may be an increase in traffic using Riggs Road as a shortcut from Rainbow Valley Road to SR85. While limited improvement of Riggs Road may be all that is necessitated due to the amount of traffic expected to be generated by the project itself, a significant increase in traffic on this route may result in additional maintenance. In addition to clarifying the intent regarding the level of improvements planned to the secondary access to the project, consideration should be given to requiring a higher level of improvement in anticipation of the additional traffic that will be attracted to the area by even minimal improvements to this route.	Thank you for your comment. Section 2.5.2.10 Roads and Access of the final EIS has been revised to clarify that Riggs Road would be used only for emergency purposes and to sporadically access the well field, and would not be authorized as a secondary access point. Section 4.15 Transportation and Traffic of the final EIS has been revised to disclose that although Riggs Road is not proposed for use by construction or regular operational traffic, there would be a risk of unauthorized use. As a result of this potential, a new potential mitigation measure to address this concern has been added to Section 4.15.9 of the final EIS. Under this mitigation measure Boulevard would contractually require its construction contractors to access the construction site from SR-85 rather than other surface/local roads.
12	139-G	TRA-4	Traffic	SR 85 from I-10 south to the proposed SSEP site is constructed as a major transportation corridor. As such, all construction traffic and all subsequent permanent site traffic must be directed to utilize this route. Other surface/local roads in the area are not improved to manage the projected volume of traffic or types of vehicles. Assuring the traffic is kept off local streets is a concern of Town Buckeye local elected officials.	Thank you for your comment. A new potential mitigation measure to address this concern has been added to Section 4.15.9 of the final EIS. Under this mitigation measure Boulevard would contractually require its construction contractors to access the construction site from SR-85 rather than other surface/local roads.
9	143-B	TRA-4	Traffic	Boulevard requests that the BLM update the traffic and access information throughout the document based on the Final Traffic Impact Analysis (TIA) submitted to the Arizona Department of Transportation in May 2010, This information was not finalized prior to release of the DEIS. The TIA now contains the most current information related to how traffic will be managed, as well as clarifications of the primary access for the Project	Thank you for your comment. The analysis in the final EIS has been updated to incorporate the May 2011 Final Traffic Impact Analysis.
255	143-B	TRA-4	Traffic	pg 4-122 Section 4.15 New TIA document provides updated information regarding traffic numbers, intersection design, road names, etc. For example- Jojoba Road is no longer the correct name of the access road. Updated version of TIA should be used and referenced for correct information.	Thank you for your comment. The analysis in the final EIS has been updated to incorporate the May 2011 Final Traffic Impact Analysis.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
21	145-G	TRA-4	Traffic	pg 4-129, Section 4.15.7.1 This subsection presents an additional mitigation measure intended to alleviate congestion and queuing created during peak morning construction workers commuting to the site. The proposed mitigation measure of uniformed officers to direct traffic is the same as the one proposed to ADOT by the developer in an initial traffic impact analysis (TIA). The TIA is the initial document needed from the developer in acquiring an encroachment permit from ADOT for its effects on traffic on SR 85. We realize that the drafting of the DEIS overlaps the preparation of the developer's TIA and encroachment permit application. Following ADOT's rejection of uniformed officers to direct traffic, the proposed mitigation has changed. Although still under review and not yet approved by ADOT, the revised TIA recommends temporarily prohibiting left turns from southbound SR 85 onto Riggs Road. Instead, traffic would proceed to the next intersection and turn onto the frontage road at the Patterson Road traffic interchange (TI). A full diamond TI, the Patterson Road TI presents a safer alternative to the use of uniformed officers and lane reductions. We recommend the final environmental impact statement replace references to the use of uniformed officers as an alternative mitigation measure with the language "In a traffic impact analysis submitted to the Arizona Department of Transportation, the developer has proposed prohibition of left turns by southbound traffic on SR 85 onto Riggs Road. Final approval of an alternative mitigation measure for traffic is expected shortly after details of a lane closure are worked out."	Thank you for your comment. Due to design changes, a uniformed officer is no longer being considered as a potential mitigation measure. This information has been removed from the final EIS. The suggested language has been modified for consistency and incorporated into the final EIS in Section 4.15.9..
1	144-G	TRA-5	Cumulative impacts	Section 4.20.4.13 Transportation and Traffic, Third Paragraph: Please include discussion on the Hassayampa Freeway and transportation network identified in the Interstates 8/10 Transportation Framework Study	Thank you for your comment. This reference has been incorporated into the analysis in the final EIS in Section 4.20.4.13.
5	145-G	TRA-5	Cumulative impacts	In the Transportation and Traffic Section (3.15) there is reference to the connection to SR 85 occurring at the future location of the Jojoba Road traffic interchange. In the Cumulative Impacts Section (4.20) there is a discussion of the coordination efforts undertaken to identify reasonably foreseeable actions. There is no indication of when the Jojoba Road traffic interchange is planned to be constructed. If it is not in the current ADOT plan, then it should be indicated as such in Section 3.15. If there is a funded construction project or a planned project, then it should be referenced in both Sections 3.15 and 4.20.	Thank you for your comment. The final EIS has been revised in Sections 3.15 and 4.20 to reflect that the current ADOT State Transportation Implementation Program, which goes out to 2013, has no plans for this intersection.
8	145-G	TRA-5	Cumulative impacts	The SSEP's proposed secondary access road from Riggs Road in the east appears to be in conflict with the proposed Hassayampa Freeway shown in the Maricopa Association of Government's (MAG) Hidden Valley Transportation Framework Study. Consideration should be given to minimizing future impacts to this access and associated waterlines. More information regarding the proposed Hassayampa Freeway can be found at the website, http://www.bqaz .org/hasReports.asp.	Thank you for your comment. Information on potential impacts to the proposed Hassayampa Freeway has been added to the final EIS in Section 4.20.4.13.1.
9	145-G	TRA-5	Cumulative impacts	The access road from the west and the Generation Tie-Line will be impacted in the future by MAG's proposed Hassayampa Freeway. These impacts may include a freeway crossing of the access road and the Generation Tie-Line along with impacts to access along SR 85 if a system to system interchange is built between SR 85 and the proposed Hassayampa Freeway. See Map 2. More information regarding the proposed Hassayampa Freeway can be found at the website, http://www.bqaz.org/hasReports.asp	Thank you for your comment. Information on potential cumulative impacts to the proposed Hassayampa Freeway has been added to the final EIS in Section 4.20.4.13.1.
10	145-G	TRA-5	Cumulative impacts	Map 26. "Reasonable foreseeable actions" shows the proposed Hassayampa Freeway adjacent to the SSEP site from the site's southeast corner. The freeway is then shown traveling due west from a point near the site's western corner. This appears to place the proposed Hassayampa Freeway less than one mile away from the Sonoran Desert National Monument. This is contrary to what is shown in the Hidden Valley Transportation Framework Study which maintains a minimum distance of one mile separation. A one mile separation will create future impacts to the sites access road and generation tie-line. More information regarding the proposed Hassayampa Freeway can be found at the website, http://www.bqaz .org/hasReports.asp.	Thank you for your comment. In response to this concern, information on potential cumulative impacts to the Hassayampa Freeway has been added to the Final EIS, and Map 26 (now Map 32 in the final EIS) has been revised to reflect MAG's conceptual Hassayampa Freeway alignment.
13	139-G	TRA-6	Road improvements/redesign	It is also imperative that the construction of roads accessing the site be in concert with the requirements set forth in area transportation planning documents, such as the MAG I-10/Hassayampa Valley Roadwork Framework Study and the I-8 & I-10 Hidden Valley Roadway Framework Study. Construction of infrastructure at the site must support or enhance the greater transportation needs of the area.	Supporting and enhancing the greater transportation needs of the area are beyond the scope of the federal decision to be made on this project. Information on future highway/freeway planning has been added to the final EIS in Section, 4.15, and 4.20.4.13.
2	145-G	TRA-6	Road improvements/redesign	Consider use of acceleration lanes from westbound Jojoba Road to northbound and southbound SR 85, during the construction period only. It is stated that there will be a considerable amount of truck traffic using this route during the construction period. This improvement would help the Jojoba Road turning traffic get up to speed prior to merging into the two lanes of SR 85 through traffic.	Thank you for your comment. An additional potential mitigation measure has been added to the final EIS in Section 4.15.9.5: To mitigate the potential impacts to LOS, an acceleration lane shall be included on the south and northbound lanes of SR-85 during construction only.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	145-G	TRA-6	Road improvements/redesign	Several geometric and striping alternatives were developed in late 2009 by Boulevard Associates, LLC, Buckeye, AZ, as alternatives for the SR 85 Northbound Ramp/Jojoba Road "T" intersection, for potential better operating conditions, especially for larger trucks (WB-67). Have these been addressed or will they be addressed in another phase of the project?	The final EIS has been revised at Section 2.5.2.10 Roads and Access to depict (Figure 2.10) and describe the SR-85/Riggs Road intersection design proposed in the revised TIA for the project, which was selected in coordination between Boulevard, ADOT/MCDOT and the AZ State Land Department.
3	145-G	TRA-7	Traffic speed	Consider advance signing on SR 85 indicating "Slow Traffic Ahead" or "Construction Vehicles Ahead" or other ways of slowing the SR 85 traffic down such as, attenuator mounted VMS or temporary reduction of the SR 85 speed limit during construction period only).	Thank you for your comment. The final EIS has been revised in Section 4.15.9 to include advance signage as a potential mitigation measure.
1	81-I	VEG-1	General Comment	This project of 3-4 acres of these solar panels, would lot of cactus and nature be destroyed?	Section 4.16 of the draft EIS, Vegetation and Special-status Species, specifically descr bes impacts of the Proposed Action and alternatives on vegetation communities and Arizona State-protected cacti. The acres of long-term and short-term impacts to vegetation communities are described in Section 4.16.2 of the draft EIS. The acres of disturbance that would negatively affect protected plant species are described in Section 4.16.3 of the draft EIS. Mitigation measures that are proposed to reduce or eliminate the extent and degree of these impacts are listed in Section 4.16.5 of the draft EIS.
6	137-T	VEG-1 (This got coded as VEG but it is more of a wildlife comment so I put it here – BTG)	General Comment	Concerns about the effect of ground water pumping on surface waters, impacts on the nearby Gila River that contains protected riparian and wetland habitat for the endangered Yuma Clapper Rail, the endangered yellow-billed cuckoo, and the southwestern willow flycatcher.	Potential impacts to surface waters are discussed in Section 4.18 of the draft EIS. On page 4-164 of the draft EIS, the second full paragraph explains that the Gila River is hydrologically disconnected from the Rainbow Valley aquifer and that therefore no impacts to the flow of the Gila River are expected. Appendix E of the draft EIS lists special-status species excluded from the analysis (including Yuma clapper rail, yellow-billed cuckoo, and southwestern willow flycatcher) and provides reasons for their exclusion.
21	143-B	VEG-1	General Comment	Creosote bush – most writers today give the common name of this plant as "creosote bush," while some continue using "creosotebush."We presume either is acceptable. However, "creosote" is a pine tar distillation product, not a desert plant. We suggest doing a universal search for "creosote" and making the appropriate correction wherever it is used.	All references to "creosote" as a stand-alone term have been revised to read "creosotebush" in the final EIS.
63	143-B	VEG-1	General Comment	pg 3-94 Section 3.16.1 (Brown 1994) is an incorrect citation. The Sonoran Desertscrub chapter in that publication was authored by R.M. Turner and D.E. Brown. Brown was the editor but each chapter was authored separately and should be cited that way. Also the correct original authorship date was 1982.	Thank you for your comment. The citation has been revised in the final EIS to reflect the correct author and date.
64	143-B	VEG-1	General Comment	pg 3-94 Section 3.16.1 Lower Colorado Valley Subdivision should be Lower Colorado River Valley Subdivision	Thank you for your comment. The text has been revised in the final EIS to read "Lower Colorado River Valley Subdivision."
65	143-B	VEG-1	General Comment	pg 3-95 Section 3.16.2.1 Currently written as "the BA was been submitted", should be "the BA has been submitted"	Thank you for your comment. The text has been revised in the final EIS to read "the BA has been submitted."
66	143-B	VEG-1	General Comment	pg 3-97 Section 3.16.3 Irregular use of generic names - i.e. name given for cholla but not saguaro	Thank you for your comment. The final EIS has been revised to include the species scientific name for saguaro.
67	143-B	VEG-1	General Comment	pg 3-98 Section 3.16.3.2 No scientific name for ironwood, but everything else is named	Thank you for your comment. The scientific name is only given for species the first time they are identified in the Chapter or Section. Ironwood is listed with its scientific name in the first paragraph of Section 3.16.3 of the draft EIS.
68	143-B	VEG-1	General Comment	pg 3-101 Section 3.16.5.3 The buffelgrass discussion really should mention fire inasmuch as the buffelgrass threat to the Sonoran Desert resides almost wholly with its ability to burn and the Sonoran Desert's inability to tolerate fire	Section 3.16.5 of the final EIS has been revised to include brief discussion of each weed species' potential to contribute to increased fuel loading and fire frequency where native plant species are not adapted to fire disturbance. Section 4.16.4 of the draft EIS contains discussion of potential impacts to vegetation communities and wildlife from increased fuel loading and fire frequency under the action alternatives. Section 4.16.1.3 of the final EIS has been revised to include general discussion of the potential for impacts from increased fuel loading and fire frequency and intensity from nonnative grass invasion.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
22	161-G	VEG-2	Plant salvage	Also, will some plants such ironwood, paloverde and mesquite be salvaged?	Section 4.16.1.2 of the draft EIS provides a discussion of the salvage of native plant species protected under Arizona Native Plant Law in both long-term use and temporary use areas. Section 4.16.3 of the draft EIS provides specific discussion of saguaro cactus salvage requirements. In addition to Arizona Native Plant Law requirements for salvage of native plants, Section 4.16.5.1 of the draft EIS presents potential mitigation measures that include salvaging native plants, which would include ironwood, palo verde, and mesquite, for use in revegetation activities.
65	150-O	VEG-3	Invasives	From Attachment A, scoping letter: The DEIS should include a thorough analysis of the impacts on the soils, including any biological soil crusts, as well as the potential for introducing non-native invasive plant species.	In the draft EIS section 4.16.1 Analysis Area and Analysis Assumptions presents a discussion of impacts to Sonoran Desert biological soil crusts (BSCs) and associated plant species and vegetation communities as a result of project activities. These impacts are referred to in the draft EIS in the appropriate portions of Section 4.16. Project-related noxious and invasive plant species impacts, as well as the negative impacts of weed invasion on BSCs, are discussed in the draft EIS in Section 4.16.1.3. Analysis of the relative impacts to plants, vegetation communities, and BSCs and soil crust and vegetation recovery during and after the life of the project are discussed throughout Section 4.16 of the draft EIS. Mitigation measures for the recovery of soils, vegetation, and BSCs are discussed in Section 4.16.5.1 of the draft EIS.
1	120-G	VEG-4	Reclamation	pg 4-142 ta ks about salvage, and storage of the top inch of biological soil crust (BSC), for both temporary and long term disturbances. This seems infeasible to me…would they really store the top inch of 3,600 acres for 30 years? One clue that I'm not understanding this correctly, or the section may be written poorly, is that the subsequent steps - artificial soil stabilization, site augmentation and innoculation would not seem to be necessary if you saved all the BSC.	Section 4.16.5.1 of the final EIS has been revised to clarify potential mitigation for BSCs for short-term versus long-term disturbance areas. The purpose of BSC salvage is to provide site-appropriate inoculant material for site reclamation. The objective of artificial soil stabilization is to retain the soil and prevent losses to wind- or water-erosion. Section 4.16.5.1 of the final EIS has been revised to clarify this objective. The objective of site augmentation is to restore the original microtopographic features of the site to the extent feasible. Section 4.16.5.1 of the final EIS has been revised to clarify this objective. The objective of inoculation with BSCs is to restore site-appropriate BSC organisms and/or propagules. Inoculation does not meet the objectives of either soil stabilization or site augmentation measures.
2	124-I	VIS-1	General Comment	I have concerns about lighting in the area.	Changes to lighting in the Project Area and surrounding area are discussed in the draft EIS in Section 4.17.3.4 Nighttime Lighting and Extent of Skyglow.
2	128-I	VIS-1	General Comment	Landscaping may help to hide visual effects.	Required measures discussed in the draft EIS in Sections 3.16.2 and 4.16.1.4, although targeted at vegetation resources, would also reduce the visual impacts of the SSEP. Further, in the ROD the BLM may require or encourage the implementation of mitigation measures discussed in the final EIS in Sections 4.16.5 and 4.17.9.
1	133-I	VIS-1	General Comment	We own several parcels of land in Rainbow Valley. Some of these parcels border on Airport Road. This makes your western fence along Airport Road to be virtually, if not literally, our backyard fence. If this fence is constructed where it is presently planned, I believe that someone standing on our property looking at the miles-long fence would reasonably feel very much like being in a prison courtyard surrounded by the prison fence. I am sure other owners with property bordering on Airport Road would share our concerns. The key attraction of this property has always been that it is surrounded by the beauty of the Sonoran Desert.	The proposed chain-link fence was included in visual simulations for the project. A visual simulation comparing the existing condition viewshed to the proposed condition viewshed was conducted for a point on Ocotillo Road (KOP 13) looking toward the west. This visual simulation (or photograph) has been added to the final EIS, in Appendix H. The photograph demonstrates that topography and the set-back distance of 60 feet renders the fence virtually undetectable from KOP 13.
2	143-B	VIS-1	General Comment	An example of where figures would be very helpful is in the visual resources section. A simple written discussion of the size and height of certain components of the Project leads the reader to believe that impacts may be very noticeable, when in reality the effects of terrain, vegetation, and the significant distances involved serve to mitigate view-shed impacts. Boulevard feels that this is most easily made clear by simply looking at visual simulations which could be included in the document.	Visual simulations have been added to the final EIS in Appendix H.
11	143-B	VIS-1	General Comment	pg ES-11 Remove the last sentence that states "Reflection from the solar panels would be vis ble for some distance adjacent to the project area." This statement is false since the panels are shaped and designed such that there is no reflection.	The text has been revised in the final EIS and now uses the terms "glint" and "glare" to discuss reflection-related visual impacts rather than the term "reflection."
257	143-B	VIS-1	General Comment	pg 4-145 Section 4.17.1 KOPs were selected to represent critical view points for each of the three sensitive viewer types including a variety of viewing conditions and distance zones within the 15-mile APVE. Two additional viewers outside of the 15-mile APVE were identified by special interest groups.	The text has been changed in the final EIS in Section 4.17.1 to note that the KOPs were selected to represent critical view points for each of the three sensitive viewer types including a variety of viewing conditions and distance zones within the 15-mile area of potential visual effects. This section has also been updated to explain that one of the KOPs falls outside the 15-mile area of potential visual effects. This KOP was identified by special interest groups. In addition, a footnote has been added to Chapter 3 that explains that visibility analyses were conducted from Woolsey Peak located in the Woolsey Peak Wilderness as suggested during a special interest group meeting. Based on the results of the visibility analysis and its distance from the Project (approximately 20 miles), Woolsey Peak may have isolated long distance views from potential dispersed recreation viewers.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
258	143-B	VIS-1	General Comment	pg 4-145 Section 4.17.3.1 Impacts to scenic quality not stated.	Scenic quality is evaluated during the Visual Resource Inventory process which precedes the assignment of Visual Management Classes for all BLM lands, not during the evaluation of impacts from the proposed project. Impacts to visual resources are evaluated using the contrast rating system (BLM Manual Section 8431) which provides a systematic means to evaluate proposed projects and determine whether these projects conform with the approved VRM objectives. Texture, form, color, and line are used to determine the level of contrast (weak, moderate, strong) that a project would impose on the landscape. It also provides a means to identify mitigating measures to minimize adverse visual impacts. The contrast rating system was used to describe impacts from the SSEP to visual resources. Additional contrast rating information has been added to the final EIS in Section 4.17 Visual Resources.
259	143-B	VIS-1	General Comment	pg 4-146 Section 4.17.3.1 "During the long-term operation of the SSEP, the regular geometric forms and strong horizontal and vertical lines associated with the solar fields, power blocks, co-firing boiler stack, and cooling towers would result in a visual contrast with the irregular, organic forms and colors of the existing landform and vegetation." Level of visual contrast for the Project not stated.	A statement discussing the degree of contrast for this landscape has been added to the final EIS in Section 4.17.3.1.
260	143-B	VIS-1	General Comment	pg 4-146 Section 4.17.3.1 "Although concentrated light would not be directly reflected toward any of the KOPs, the solar thermal troughs, when viewed from elevated viewing positions at certain times of the day, would reflect the sky, resulting in intermittent bright colors that would contrast with the dull hues of the surrounding tan soils and grey-green vegetation." Level of visual contrast for the Project not stated.	A statement discussing the degree of contrast for this landscape has been added to the final EIS in Section 4.17.3.1.
261	143-B	VIS-1	General Comment	pg 1-146 Section 4.17.3.2 Impacts for sensitive viewers (and associated KOPs) are not stated.	Section 4.17.3.2 of the draft EIS discusses impacts to sensitive viewer types (travel routes, recreation areas, and residences) from each applicable KOP. Impacts are generally discussed in terms of components of the SSEP that would be visible in foreground, middleground, and background distance zones. Visual contrast ratings at KOPs 2 and 6–17 are also discussed. Visual contrast level has been added to the final EIS in this section for KOPs 1, 3, 4, 5, and 18.
262	143-B	VIS-1	General Comment	pg 1-146 Section 4.17.3.2 KOP 5, 1, 2, 6, and 17: Suggest replacing "visible against the backdrop" to backdropped for consistency with BLM visual terminology.	The change has been made in the final EIS in Section 4.17.
263	143-B	VIS-1	General Comment	pg 1-146 Section 4.17.3.2 KOP 5: Visual contrast level not stated.	A statement discussing the degree of contrast for this landscape has been added to the final EIS in Section 4.17.3.2.
265	143-B	VIS-1	General Comment	pg 1-146 Section 4.17.3.2 Visual sensitivity not stated for all travelway viewers (KOPs 5, 7, 8, 11, and 16)	The term "visual sensitivity" is typically used for visual impacts analysis on U.S. Forest Service lands. Impacts to visual resources on BLM lands are evaluated using the contrast rating system (Manual Section 8431) which provides a systematic means to evaluate proposed projects and determine whether these projects conform to the approved VRM objectives. Visual sensitivity is incorporated into BLM's visual resource impacts analysis through KOP selection. KOP selection is based, in part, on the number of people that will be at the viewpoint, the slope aspect, etc.
266	143-B	VIS-1	General Comment	pg 1-146 4 Section 4.17.3.2 KOP 3, 4: Visual contrast and viewing condition not stated for either viewing location. KOP 3 is at a level viewing condition whereas KOP 4 is superior.	Visual contrast information for KOPs 1, 3, 4, 5, and 18 has been added to the final EIS in Section 4.17. Additionally, viewing condition information has been added to the final EIS in Section 4.17 for KOPs 3 and 4.
267	143-B	VIS-1	General Comment	pg 1-146 Section 4.17.3.2 KOP 18: "The bright reflective mirrors would contrast with the dull hues of the existing developments, fields, and surrounding tan soils and gray-green vegetation." Visual contrast not stated.	A statement discussing the degree of contrast for this landscape has been added to the final EIS in Section 4.17.3.2.
268	143-B	VIS-1	General Comment	pg 4-148 Section 4.17.3.2 KOP 10, 12, and 17: "The regular geometric forms and strong form and lines associated with the solar fields and power block stacks would result in moderate contrast with the irregular, organic forms of the existing landform and vegetation. The distance from this KOP would further reduce contrast." The technical report states that weak contrast is anticipated for KOP 10 and weak/moderate contrast for KOP 12 or 17.	The following changes, based on the updated visual resources technical report, have been made in Section 4.17.3.2 of the final EIS: 1) a moderate contrast rating was added for KOP 10 and 2) the contrast ratings for KOP 12 were changed from weak/moderate to weak/moderate/strong.
69	150-O	VIS-1	General Comment	From Attachment A, scoping letter: It is clear that there will be significant visual impacts from the construction of the Sonoran Solar Energy project—especially given its proximity to the Sonoran Desert National Monument and to the North Maricopa Wilderness Area. The construction of a large-scale industrial development anywhere on public lands will entail significant visual impacts, and the benefits which the Sonoran Solar Energy project will provide may well outweigh the costs of the visual impacts from this development. Recommendation: The BLM should analyze visual impacts from the project and strategies to minimize those impacts, as well as require best management practices to further limit visual impacts. The BLM should ensure that the project complies with all Visual Resource Management requirements and objectives.	Impacts to visual resources from the SSEP and strategies to minimize visual impacts are discussed in Section 4.17 of the draft EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
24	162-I	VIS-1	General Comment	I'm a little taken aback by the DEIS comments regarding how visual and sound impacts would be lessened as visitors move toward the center of SDNM or North Maricopa Wilderness. Using that sort of mitigation logic, visual impacts would be completely eliminated if I poked my eyes out with a spoon	This part of the statement was not intended to be mitigation but rather to show that as a visitor moves to the interior of the Sonoran Desert National Monument or North Maricopa Wilderness, topography, distance, and elevation changes would make the SSEP less visible. A statement noting this has been added to the final EIS in Section 4.11.1 Recreation and Wilderness Characteristics Analysis Area and Assumptions.
2	142-I	VIS-2	Analysis Methodology	The DEIS does not address the impact of glare from the arrays of parabolic mirrors. This impact can be significant and extend for miles beyond the analysis area. I wish to point out the presentation "Visual Impact Assessment of Utility-Scale Solar Energy Development on BLM Lands" by Robert Sullivan of the Argonne National Laboratory, given at the BLM Renewal Energy Summit, held August 31 - September 3, 2009, at Las Vegas, NV. The presentation included the following points: (a) Non-PV systems have thousands of highly polished mirrors subject to glare; (b) Specular reflection (glare) is a concern, e.g., Ivanpah, Nevada Solar One-At low sun angles or elevated views, e.g., on roads, in mountain-May extend range of significant impact; and (c) Large scale of solar projects means impacts outside of study areas must be considered-25 miles for Solar PEIS.	Information about the impacts of glint and glare has been added to the final EIS in Section 4.17.3.5 Potential Glint and Glare Impacts.
256	143-B	VIS-2	Analysis Methodology	pg 4-145 Section 4.17 Visual Resources- Impacts are discussed in terms of visual contrast which may be difficult for the general public to comprehend. There was an attempt to address visual impacts to high sensitivity viewers within the SDNM but it's stated in the recreation section. Also Map 18 calls out "Potential KOP points" when in fact they are KOPs/simulation locations, which was clearly labeled on our maps. Why they are interpreting as "potential". No simulations are presented in the DEIS. Including visual simulations somewhere in this document would likely allay concerns of readers regarding the potential for visual impacts. The fact of the matter is that given the presence of vegetation and terrain, and the distances to potential sensitive viewing locations, the simulations show a very limited impact.	To improve public understanding of visual contrast ratings additional information on degrees of contrast criteria has been added to the final EIS in Section 4.17.1. The legend of Map 18 (now Map 21 in the final EIS) has been changed in the final EIS to read "KOPs/Simulation Locations" and "potential" has been deleted. Finally, simulations and supporting analysis have been added to the final EIS in Appendix H.
264	143-B	VIS-2	Analysis Methodology	pg 4-146 Section 4.17.3.2 KOP 7 and 8: "The regular geometric forms and strong form and lines associated with the power block stacks and transmission line would result in a moderate visual contrast with the irregular, organic forms of the existing landform and vegetation." Is this a statement of contrast for the entire project? If so what is the anticipated impact given that "The distance and timing from this KOP would further reduce visual contrast." The technical report states that project contrast is anticipated to be strong to moderate/strong for the solar fields and power blocks. For sensitive viewers, contrast would decrease as viewing distance increases and/or elevation of the viewer decreases. Overall, the associated transmission lines would introduce a weak level of contrast because it would parallel existing transmission lines.	This is not a statement of contrast for the entire project. As discussed in Section 4.17.3.2 of the draft EIS, KOPs 7 and 8 are only representative of the viewshed looking from SR-85 toward the Project Area. The statement has been revised in the final EIS to read "The distance and timing from this KOP would further reduce visual contrasts to weak or none."
11	145-G	VIS-2	Analysis Methodology	The effects of glare caused by solar arrays on drivers on the roadway and air transportation should be further determined and descr bed.	Information on the effects of glint and glare has been added to final EIS in Section 4.17.3.5 Potential Glint and Glare Impacts.
5	161-G	VIS-2	Analysis Methodology	We are concerned about the potential degradation of the Buckeye Hills Regional Park viewshed, especially from higher terrain where trails might be built in the future. The key observation point in the park was placed in a low-lying area that is presently accessible. 4.11.3 mentions that the park "would be completely screened from the SSEP." We would like that to be confirmed at higher elevations. The largely unbroken natural desert vistas would be marred by a huge industrial facility.	Information has been added to the final EIS in Section 4.17.3.2 to disclose the impacts from the SSEP to visual resources from higher elevations in the Buckeye Hills Regional Park. The SSEP would be completely screened by topography and vegetation from the entire regional park.
23	162-I	VIS-2	Analysis Methodology	The document has no analysis or discussion of the very serious reflectivity of the parabolic mirrors and potential impacts to view-sheds in SDNM, the North Maricopa Wilderness, and the proposed wilderness at Margie's Cove. It is a fact that small hand held signal mirrors can be seen for up to 20-50 miles or even more. From what distance will one be able to see three thousand acres of these huge mirrors? Why no photos or comparisons with other similar facilities in the DEIS? What is being omitted here and why?	Information regarding potential glint and glare visual effects from the SSEP has been added to Section 4.17 Visual Resources of the final EIS. Simulations and supporting analysis has been added to the final EIS in Appendix H.
2	133-I	VIS-4	Mitigation	Please set the fence back away from Airport Road, toward the west, by a few hundred yards or even a few hundred feet [to address visual concerns of neighboring parcels].	The proposed chain-link fence was included in visual simulations for the project. A visual simulation comparing the existing condition viewshed to the proposed condition viewshed was conducted for a point on Ocotillo Road (KOP 13) facing toward the west. This visual simulation (or photograph) has been added as Appendix H of the final EIS. The photograph demonstrates that topography and the set-back distance of 60 feet renders the fence virtually undetectable from KOP 13. In addition, BLM considered the Reduced Footprint Alternative (Alternative B) in the draft EIS and the photovoltaic alternative (Sub-alternative A1) in the final EIS, both of which would include setbacks greater than suggested.
3	133-I	VIS-4	Mitigation	Chose fence construction material that is reasonably esthetic and which one cannot see through [to address visual concerns of neighboring parcels].	As noted in Chapter 2, "Chain-link security fencing would be installed around the site perimeter (approximately 10 miles), switchyard, and other areas requiring controlled access." Nonpermeable fencing or fencing that could not be seen through is not considered feasible because it would trap sand and debris within the Project Area. Visual simulations of the Project Area, including the fence, have been added as Appendix H to the final EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	133-I	VIS-4	Mitigation	Provide some landscaping which blends with the desert [to address visual concerns of neighboring parcels].	Section 4.17.7 of the draft EIS identifies the following mitigation measure that the BLM may adopt in the ROD: "Where feasible, painted facilities would use standard BLM (desert colors) to reduce visual contrast." In addition, in the draft EIS under the Reclamation of Temporary Disturbance row in Table 2.1 Applicant-committed Environmental Protection Measures it states, "All temporarily disturbed areas would be reclaimed to as close to their pre-construction conditions as possible, as required by the BLM."
2	140-G	VIS-4	Mitigation	The ends of the solar troughs (horseshoe shaped sides) should contain a texture tile/panel coating (not paint) that blends with the vegetation present for the majority of the year. The texture should also extend downward to include the bottom or panel stands. It may be feasible to coat only the first few rows of each, from each exposure point. Should the positioning of the trough be changed from the current proposals, where they might be situated so the rounded underbelly part faces the Sonoran Desert National Monument, then the round underbelly should be also textured. Otherwise, it is sufficient to coat only the sides that face the Monument and face nearby homes;	Section 3.17.4 Visual Management Objectives states that "The VRM objectives for the Project Area were established in the Lower Gila South RMP (BLM 1988). Lands in the Project Area have been allocated to VRM Class IV objectives. The objective of Class IV is to provide for management activities that require major modifications to the existing character of the landscape. These activities may dominate the view and may be the major focus of viewer attention." As described in Section 2.5.2.1.1 Solar Collection Assemblies of the draft EIS, the solar collector assemblies would be aligned on a north-south axis to track the sun as it moves across the sky from east to west, which would limit the utility of a potential "camouflage" coating on the bottom side of the collectors. Regarding a screening mechanism on the southern side of the north-south collector rows—the BLM assumes that the commenter is concerned with a means to again "camouflage" the solar facility from the Sonoran Desert National Monument to the south. Since the Sonoran Desert National Monument covers ground of a higher elevation, an observer to the south would be looking down at and across the facility from a superior viewpoint. The viewer would have views of a much larger portion of the facility than just the southern edge of the collector rows, so it is unlikely that the viewer would be able to perceive any type of protective barrier or coating on the southern solar collectors. In either case, the introduction of any material not contemplated by the technology manufacturer introduces risk of fire because this facility would operate under extreme temperature conditions and use superheated fluids to collect heat. However, as noted in the draft EIS in Section 4.17.7 Visual Resource Mitigation Measures, "Where feasible, painted facilities would use standard BLM (desert colors) to reduce visual contrast."
5	140-G	VIS-4	Mitigation	Additionally, treat powerblock with colorized textured tiles or panels the power block buildings and if dry cooling is chosen, also treat with color textured panels/tiles the exteriors. [viewed as critical visual mitigation factor.]	Section 3.17.4 Visual Management Objectives states that "The VRM objectives for the Project Area were established in the Lower Gila South RMP (BLM 1988). Lands in the Project Area have been allocated to VRM Class IV objectives. The objective of Class IV is to provide for management activities that require major modifications to the existing character of the landscape. These activities may dominate the view and may be the major focus of viewer attention." As noted in the draft EIS in Section 4.17.7 Visual Resource Mitigation Measures, "Where feasible, painted facilities would use standard BLM (desert colors) to reduce visual contrast."
6	140-G	VIS-4	Mitigation	Salvage all plant life, especially any cacti, and replant these to the south of the proposed site between the project site's proposed "cleared area" and the utility corridor – on the edge of the utility corridor; and, to plant vegetation along highway 85 to additionally buffer the harsh impact of the proposed mirrors; and,	Thank you for your comment. Required measures discussed in the draft EIS in Sections 3.16.2 and 4.16.1.4, although targeted at vegetation resources, would also reduce the visual impacts of the SSEP. Further, in the ROD the BLM may require or encourage the implementation of mitigation measures discussed in the draft EIS in Sections 4.16.5 and 4.17.7.
7	140-G	VIS-4	Mitigation	It is preferred if the transmission towers (distribution and transmission) are color-coated. Again, paint is not recommended. It is also highly suggested that the corridor of transmission lines that occur between the Monument and the proposed site are all aligned in the same color that blends with the vegetation, including those in existence, perhaps through an MOU or within the Power Purchase Agreement with the power company that purchases the electricity; and, if possible, align the grid of the power lines to reduce impact; and	The transmission towers would be H-frames, and BLM and the proponent are not aware of any safe, effective, and durable color-coating for the towers. In addition, as stated in Section 3.17.4 Visual Management Objectives, "The VRM objectives for the Project Area were established in the Lower Gila South RMP (BLM 1988). Lands in the Project Area have been allocated to VRM Class IV objectives. The objective of Class IV is to provide for management activities that require major modifications to the existing character of the landscape. These activities may dominate the view and may be the major focus of viewer attention." However, as noted in the draft EIS in Section 4.17.7 Visual Resource Mitigation Measures, "Where feas ble, painted facilities would use standard BLM (desert colors) to reduce visual contrast."
8	140-G	VIS-4	Mitigation	[To reduce visual impacts], the project roads with magnesium chloride	Under Air Quality in Table 2.1 in the draft EIS the applicant has committed to apply dust suppressants such as magnesium chloride.
9	140-G	VIS-4	Mitigation	[To reduce visual impacts], Mandate a reseeding and maintenance program for vegetation and/or plant cacti especially in two areas: along the Highway 85 corridor and in between the proposed project and the National Monument;	In the draft EIS Section 2.3, Features, Management, and Considerations Common to Each Action Alternative describes measures that would be taken, under any action alternative, to reduce impacts to all resources including visual resources.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
10	140-G	VIS-4	Mitigation	Participate in off-site mitigation factors or programs that benefit the visual surroundings and provide the same or enhanced natural experience for h kers, OHV riders, and other visitors. Consider a visitors center or other educational interpretative features on site and off measures could be achieved off site at the highway and Monument gateways; and, this should include dust suppressants on project roads and a program to assist OHV communities on nearby trails/routes. It was generally accepted that once construction begins and the plant is operational that more people will immediately begin to access the area more so than now. Therefore, the group felt that the BLM and project proponent should pay attention to and mitigate increased visitation in the immediate area that includes education, opportunities to highlight renewable energy, contain dust and traffic, as well as the visual resources.	Measures to address dust, traffic, and visual resources impacts can be found in the draft EIS in Table 2.1.1 Applicant-committed Environmental Protection Measures Common to Each Alternative and in the potential mitigation measures sections of Sections 4.2 Air Quality, 4.15 Transportation and Traffic, and 4.17 Visual Resources. The development of a visitor's center or other education interpretative features would increase surface disturbance and is therefore not being considered as potential mitigation.
11	140-G	VIS-4	Mitigation	Any fencing color / material must also be textured to match the vegetation and landscape a it appears the majority of the year;	In the draft EIS Section 3.17.4 Visual Resource Management Objectives states that "The VRM objectives for the Project Area were established in the Lower Gila South RMP (BLM 1988). Lands in the Project Area have been allocated to VRM Class IV objectives. The objective of Class IV is to provide for management activities that require major modifications to the existing character of the landscape. These activities may dominate the view and may be the major focus of viewer attention." However, visual impacts would be mitigated as discussed in the draft EIS in Section 4.17 Visual Resources and Table 2.1 Applicant-committed Environmental Protection Measures. Potential mitigation measures that the BLM may select in the ROD consist of painting facilities (including fencing) to reduce visual contrast (see draft EIS Section 4.17.7).
12	140-G	VIS-4	Mitigation	Lighting should be focused down-facing	As per Section 4.17.3.4 Nighttime Lighting and Extent of Skyglow in the draft EIS, "Lighting would be shielded and directed to focus illumination downward on the desired areas and to minimize additional nighttime illumination from the SSEP."
13	140-G	VIS-4	Mitigation	Cover the evaporation pounds to reduce reflections (and pest control).	Covering ponds with materials to reduce reflection would reduce the rate of evaporation thereby negating the purpose of the ponds. However, evaporation ponds would be covered by netting to protect wildlife. The ponds would be hypersaline, as noted in Section 4.19 Wildlife and Special Status Species of the draft EIS, and are unlikely to attract pests.
3	142-I	VIS-4	Mitigation	I recommend the DEIS address the issue of glare and identify mitigation measures. Possible measures identified in Robert Sullivan's presentation include: • Consider visual concerns early in project planning. • Encourage low-profile technologies and components. • Site as far from sensitive areas as possible. • Use slight variations in topography to screen solar collectors. • Blend arrays with contours to harmonize where concealment is impossible. • Move mirrors, adjust mirrors, or screen to reduce glare.	Information about the impacts of glare has been added to the final EIS in Section 4.17.3.5 Potential Glint and Glare Impacts. Regarding the possible mitigation measures identified in Robert Sullivan's presentation: • Visual concerns were considered early in the project as they were identified as an issue during public scoping and were addressed during alternative development. Please see Chapters 1 and 2 of the draft EIS for more information. • Low-profile technologies and components are considered in Sub-alternative A1 in the final EIS • Project infrastructure would be sited as far from sensitive areas as possible under Sub-alternative A1 and Alternative B. In addition, please refer to Section 2.10.6 Alternate Locations of the draft EIS for more information on site screening • It is not feas ble to use variations in topography to screen solar collectors as the site must be graded to level. Please see the draft EIS Site Grading Section 2.5.3.3. Civil Works Construction Sequence. • It is not feas ble to blend arrays with contours to harmonize where concealment is impossible. The arrays need to be organized for mirror washing, engineering, etc. please see Section 2.7.2 Proposed Facilities and Infrastructure of the draft EIS. • Moving and adjusting mirrors to reduce glare would be done as practicable
70	150-O	VIS-4	Mitigation	From Attachment A, scoping letter: Further, there are a significant number of solar energy projects proposed for the Sonoran Desert. Accordingly, the BLM must assess not just the visual impacts from Sonoran Solar Energy project, but also the likely cumulative visual impacts from proposed renewable energy and transmission development in this area of the Sonoran Desert and begin now to develop comprehensive mitigation strategies to address and minimize these impacts in connection with future projects.	Section 4.20.4.15 of the draft EIS discusses cumulative impacts to visual resources. Potential mitigation measures to reduce visual resource related impacts are discussed in Section 4.17.9 of the final EIS. Chapter 2 of the draft EIS and final EIS, under Applicant-committed Environmental Protection Measures, discusses measures to reduce impacts that were designed into the project under all alternatives. Development of comprehensive mitigation strategies for the region is beyond the scope of the federal decision for the SSEP because the decision before the BLM with respect to the SSEP is site specific in nature whereas the development of comprehensive mitigation strategies for the region are programmatic in nature.
276	143-B	WAT	277	pg 4-170 to pg 4-173, Section 4.18.2 The other metric used was to quantify the total amount of groundwater withdrawn for each alternative over the 30-year life of the project, which was the only way to compare water use among the various alternatives. The results are presented in Table 4.77, and the calculations are correct. The long-term groundwater recharge recovery was calculated for each alternative using the estimated recharge rate for the Rainbow Valley Subbasin. The results are presented in Table 4.78, and the calculations are correct.	Thank you for your comment.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	2-G	WAT-1	General Comment	My biggest concern will continue to be the water usage involved with this project.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
1	5-I	WAT-1	General Comment	This Sonoran Solar Energy Project will not be efficient and will destroy our desert. The water that it will be removing will not be renewable energy - Not green because it uses a finite resource.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
2	77-I	WAT-1	General Comment	I am concerned that... water use be kept to a minimum.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
6	136-G	WAT-1	General Comment	Although BLM has not selected a preferred alternative for this project. it is my understanding that the BLM is fast tracking this project through the environmental review process in order to facilitate project approval before the end of the year. Given the tremendous impacts wet -cooling CST projects can have on water resources, I urge the BLM to take affirmative steps to ensure it has all relevant information to evaluate and identify approaches to minimize these negative impacts and safeguard Arizona' s water supplies for its citizens.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
69	143-B	WAT-1	General Comment	pg 3-106 Section 3.18.1.2.1 Change to this sentence: The USACE determined that there are no significant nexus between the washes onsite and the nearest TNW, therefore there are no Waters of the U.S. on the site (see Appendix A. Consultation Letters).	Thank you for your comment. The suggested revision has been made in Section 3.18.1.2.1 of the final EIS.
70	143-B	WAT-1	General Comment	pg 3-107 Section 3.18.1.2.4 Add this sentence to end of first paragraph in this section: The Maricopa County Department of Planning & Development does have jurisdiction over the portion of the access road that crosses State Land.	Thank you for your comment. The suggested revision has been made in Section 3.18.1.2.4 of the final EIS.
71	143-B	WAT-1	General Comment	pg 3-107 Section 3.18.1.2.5 The Project is within BLM jurisdiction or Maricopa County jurisdiction only. We should not include Buckeye requirements.	Thank you for your comment. Section 3.18.1.2.5 of the draft EIS explicitly states that the Town of Buckeye does not have jurisdiction over development on federal lands and that Boulevard would consider the requirements of the Town of Buckeye in the development process. The draft EIS does not state that Boulevard would be required to comply with Town of Buckeye standards and policies. The standards and policies of the Town of Buckeye were included to foster cooperation and ensure adequate public disclosure.
72	143-B	WAT-1	General Comment	pg 3-108 Section 3.18.1.3 Change to this sentence: The Waterman Wash watershed covers 422 square miles. The portion of the Waterman Wash watershed that passes through the site also extends south into the North Maricopa Mountains with elevations ranging from approximately 800 to 2,813 feet above sea level.	Thank you for your comment. The suggested revision has been made in Section 3.18.1.3 of the final EIS.
73	143-B	WAT-1	General Comment	pg 3-109 Section 3.18.1.3.2 Change to this sentence: Rainbow Wash is ephemeral, flowing only during and immediately following large precipitation events	Thank you for your comment. The suggested revision has been made in Section 3.18.1.3.2 of the final EIS.
74	143-B	WAT-1	General Comment	pg 3-109 Section 3.18.1.3.3 Change to this sentence: The larger washes in the watershed tend to have higher amounts of vegetation along their banks and that vegetation tends to be larger in size.	Thank you for your comment. The suggested revision has been made in Section 3.18.1.3.3 of the final EIS.
75	143-B	WAT-1	General Comment	pg 3-110 Section 3.18.1.4 Change to this sentence: Pesticide residues such as DDT metabolites, toxaphene, and chlordane are also a result of agricultural practices.	Thank you for your comment. The suggested revision has been made in Section 3.18.1.4 of the final EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
1	146-I	WAT-1	General Comment	Is solar power the best use of the land and precious water. If the land is taken care of, it then be used for other things in later years. This can't be said for water. Once it is used it is gone. This is a desert and water is essential to life.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
14	148-G	WAT-1	General Comment	The DEIS should consider the impact of population trends in Arizona on water supply.	Additional water demands associated with future growth in the Rainbow Valley Sub-basin are incorporated in the cumulative effects analysis of groundwater resources found in Section 4.20.4.17 of the draft EIS.
50	150-O	WAT-1	General Comment	From Attachment A, scoping letter: Renewable resource development is not appropriate everywhere on the public lands, however, and development that does occur on the public lands must take place in a responsible manner. We think it is most appropriate to seek disturbed sites or sites where the facility will not result in a net increase in water use	Thank you for your comment. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
56	150-O	WAT-1	General Comment	From Attachment A, scoping letter: We also think projects should be located, to the greatest degree possible, in areas where there will not be a net increase in water use. Barring this, technologies that utilize less water should be considered.	Thank you for your comment. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
66	150-O	WAT-1	General Comment	From Attachment A, scoping letter: Water is a limited resource in the desert southwest, and any project proposal should fully analyze the water needs and identify sources to meet those needs. Since NextEra is proposing a wet-cooled system in a desert environment, we are concerned about the project's water use. According to the applicant, NextEra, the company will acquire or lease water from an entity holding a grandfathered irrigation water right to operate this system, displacing a current or historical water use. The DEIS should include information on how much water the plant is expected to use on an annual basis, where the company will obtain the water, and the impacts of using that water. It should also include any information on how the plant proposes to reuse its water and manage its waste stream. Finally, depending on the plant's source of water, there may be issues about the environmental impacts of delivering water on site. Recommendation: In developing the DEIS, the agencies should gather additional information to confirm that the water needed for the Sonoran Solar Energy project will be available as well as that the source of the needed water, will conform to existing ACC policy and all laws, ordinances, regulations, and standards. The BLM must insure that the impacts of using this water, including the cumulative impacts, are analyzed	Thank you for your comment. Water use, withdrawal locations, and direct and indirect impacts associated with water use are summarized in Section 4.18.2.3 of the draft EIS and detailed in Appendix E and Appendix F (F and G in the final EIS). The cumulative impacts of water use for the SSEP are discussed in Section 4.20.4.17 of the draft EIS. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
100	150-O	WAT-1	General Comment	From Attachment A, scoping letter, Attachment A - Criteria for use in identifying appropriate areas for development: Currently, most proposed solar power generation facilities involve wet-cooled technologies that require significant amounts of water. Some of these projects will be located on lands that may have sufficient water rights to operate these facilities over their lifetime (typically, 30-50 years). Others may need to secure a water right from another senior water right holder, either to deliver the proposed water to their facility or retire that water right as a mitigation measure. In assessing a proposed plant's impact on water resources, we will look at the following: • The source of water used, how efficiently that water is used, and how waste water is disposed. • Associated environmental impacts, including the proposal's impact on groundwater levels in the sub-basins in which the facility is located and/or is drawing its water. Given that water resources are an especially valued resource in our desert environment, there is a pressing need to develop federal- and state-level policies that encourage over the long term the adoption of low- or no-water technologies for solar and all other sources of energy in Arizona.	Thank you for your comment.
17	148-G	WAT-10	Surface water modeling	In addition to the lack of clarity of the exterior flow path, the DEIS does not describe the impacts of these rerouted surface waters on downstream drainages and washes. A comprehensive method to evaluate impacts is through modeling. While the DEIS discusses hydraulic monitoring "to understand the preconstruction conditions and functions of the floodplains" (page 4-155), it does not state that the impacts of post-construction layout will be modeled.	As described in Sections 2.5.2.7 and 2.5.2.8.3 of the draft EIS, all drainage from the project site as well as water draining to the project site from upstream, would be collected and released to existing washes through a series of controlled release points that are sized to match historic drainage patterns and flow rates. This design feature would become a condition of approval in the ROD if BLM approves the project (see Section 1.4.2 of the draft EIS).
21	148-G	WAT-10	Surface water modeling	The FEIS should clarify the flow path of exterior storm water flow, and summarize modeled impacts (hydraulics of flow, velocity, sediment transport, sediment delivery and potential stream channel changes) of diverting drainages and floodplains.	Thank you for your comment. Impacts of rerouting surface water are discussed in Section 4.18.1.3 of the draft EIS. The impact indicators identified in Section 4.18.1.3 provide sufficient information for the decision maker to differentiate between the alternatives and therefore modeling analysis is not necessary.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
2	5-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	The water will be removed the area and leave 100's without water	Well drawdown impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS). Even the most intensive water use alternatives projected amounts of use that were within the limits established in the current 3rd Management Plan (TMP) of the Phoenix AMA. New provisions are included in the TMP to limit significant drawdown in existing wells and to avoid further instances of subsidence through well spacing and pumping restrictions. As noted in the draft EIS, some impact from groundwater withdrawal will not occur. However, Boulevard will be required to meet all permit stipulations to further reduce the risk of occurrence of the extreme conditions the commenter descr bes.
2	8-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	I purchased my home 1 year ago and now I'm being threatened by this new proposed facility [for example] The subsidence and possible fissures created due to the massive draw off of water	Thank you for your comment. Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and F (F and G in the final EIS). Even the most intensive water use alternatives projected levels of drawdown within the limits established in the current 3rd Management Plan (TMP) of the Phoenix AMA. New provisions are included in the TMP to limit significant drawdown in existing wells and to avoid further instances of subsidence through well spacing and pumping restrictions. As noted in the draft EIS, some impact from groundwater withdrawal will not occur. However, Boulevard will be required to meet all permit stipulations to further reduce the risk of occurrence of the extreme conditions the commenter descr bes. Appendix G of the final EIS has been updated with a complete list of wells surrounding the SSEP that would be impacted by water withdrawals. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
3	11-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The net effect of SSEP pumping which will lower the water table by as much as 85 feet should not adversely impact the depth to groundwater for making a determination of ASW for the City since the City anticipates pumping at a depth of 700 feet, well above the 1,000-foot limitation set forth in ADWR rules	Thank you for your comment. As a clarification, the maximum level of drawdown attributable to the SSEP is approximately 34 feet, as shown in Table 4.78 of the draft EIS.
1	84-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	As a resident in lower Rainbow Valley I have to express some concerns because the plant has the potential to lower the water table enough to make wells in the area go dry.	Thank you for your comment. Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendices E and F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
4	124-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	Can you guarantee my well will not go dry-will you produce a bond to drill deeper will it runs dry?	Appendices F and G of the final EIS have been updated with a complete list of wells surrounding the project that would be impacted by water withdrawals, including well number 206270. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot, after 5 years, and 30 years. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS. The state will not issue a bond for well impacts, however, all groundwater pumping associated with the SSEP will be conducted according to the GIU permit issued by ADWR (see section 4.18.2.3).
1	126-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	In your report, it states that landowners will be respons ble for lowering their wells when the water table drops. Farmers and dairies left the area because of water loss. This is a desert.	Thank you for your comment.
1	127-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	I have concerns about well drawdown.	Well drawdown impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS).
2	129-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The proposed source of the water to serve the project is the same aquifer that the City intends to use to serve the southern portion of Goodyear in the future... the project is located within the City of Goodyear's Municipal Planning Area. The city of Goodyear is expected to grow to a population of 650,000 at build-out with 2/3 of that population residing south of the Gila River. Considering the fact that the City is operating under the Third Management Plan for the Phoenix Active Water Management Area and is required to strive for a goal of zero net water pumping by 2025, it would seem imprudent to allow a water use that consumes as much as 3,000 acre feet annually, without requiring some replacement of that water.	Section 4.20.4.17 of the draft EIS evaluates the cumulative impact of the project including reasonably foreseeable water demands. Future water demands that have not been approved through the Assured Water Supply Program were not included in this analysis because there is insufficient information and certainty about those demands. The BLM has reviewed the potential use of aquifer replenishment as a mitigation measure and has not included it in the final EIS for several reasons. First, based on a review of the potential water sources described in Section 2.9.7 of the draft EIS and the following subsections, in most cases the use of alternative water sources at the SSEP site would require pipelines and pumping, and their associated impacts. Thus, these sources would resolve one resource conflict at the expense of another. In addition, as documented in Section 2.9.7 of the draft EIS, the use of these sources for replenishment would generally be either speculative or economically infeasible. Second, replenishment would not lessen the use of water; it would simply shift the (primarily socioeconomic) impacts of water consumption elsewhere in the region. Third, the use of water for the SSEP would be subject to the permitting requirements of the AZ DWR. BLM does not have jurisdiction over the permitting of these water resources, and believes that the use of aquifer replenishment as a mitigation measure for SSEP impacts is unl kely to be implemented given that the SSEP has demonstrated that it would meet the permit requirements for a GIU permit.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
6	129-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	Any new consumptive use of groundwater should be thoroughly reviewed and evaluated before it is approved, and any such approval should consider some replacement of groundwater to the same aquifer from which the water is withdrawn, or at a minimum at some other location within the Phoenix Active Management Area.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS). BLM has reviewed the potential use of aquifer replenishment as a mitigation measure and has not included it in the final EIS for several reasons. First, based on a review of the potential water sources described in Section 2.9.7 of the draft EIS and the following subsections, in most cases the use of alternative water sources at the SSEP site would require pipelines and pumping, and their associated impacts. Thus, these sources would resolve one resource conflict at the expense of another. In addition, as documented in Section 2.9.7 of the draft EIS, the use of these sources for replenishment would generally be either speculative or economically infeasible. Second, replenishment would not lessen the use of water, it would simply shift the (primarily socioeconomic) impacts of water consumption elsewhere in the region. Third, the use of water for the SSEP would be subject to the permitting requirements of the AZ DWR. BLM does not have jurisdiction over the permitting of these water resources, and believes that the use of aquifer replenishment as a mitigation measure for SSEP impacts is unl kely to be implemented given that the SSEP has demonstrated that it would meet the permit requirements for a GIU permit.
8	129-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	Lastly, the City of Goodyear would like to be assured that approval of this project will not have an adverse impact on the future siting and drilling of water wells to supply the City's potable water system.	Additional water demands associated with future growth in the Rainbow Valley Sub-basin are incorporated in the cumulative effects analysis on groundwater resources found in Section 4.20.4.17 of the draft EIS.
9	129-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	Lastly, the City of Goodyear would like to be assured that approval of this project will not have an adverse impact on the future siting and drilling of water wells to supply the City's potable water system.	Additional water demands associated with future growth in the Rainbow Valley Sub-basin are incorporated in the cumulative effects analysis of groundwater resources found in Section 4.20.4.17 of the draft EIS.
1	132-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	I am afraid that the use of wet cooled technology on the new plant will consume water reserves from underground at a staggering rate. As a consequence I think that my water well and my neighbors will dry completely, leaving us without water for our basic needs.	Well drawdown impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS).
1	134-I	WAT-2	Groundwater Impacts, Aquifer Drawdown	Please review my impact study and reconsider using or aquifers as a source of water to power Solar Project [attachments includes excerpts from Chapter 4 of the DEIS, as well as correspondence with neighbors, letters to Bank of America, agencies, and copies of all other comment letters submitted]	Well drawdown impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS).
3	136-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The model developed for purposes of this DEIS projects that the groundwater pumping over the anticipated 30-year life of the project would draw down 168 registered well s in the Rainbow Valley Basin--many of them domestic-as much as 34 feet. In addition, there would be a significant reduction in groundwater reserves of 69,150 acre feet. The Final EIS should analyze what impacts these drawdowns would have on individual well owners, nearby communities and other uses in the greater project area.	Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E (F in the final EIS). Greater detail on the potential impacts to individual wells has been added to the final EIS in Section 4.18.2.3.1.
4	136-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	Moreover, the Final EIS should include a description of the wellhead protection or mitigation measures, if any, that will be employed to address these impacts on the individual well owners and the communities in the Rainbow Valley Basin.	No wellhead protection measures are proposed to address impacts on individual well owners. An individual aquifer protection permit (APP) would be obtained from ADEQ and would ensure protection of the aquifer from contamination associated with the project. See Section 1.6.4, Table 1.5 of the draft EIS and Section 4.18.2.1 of the final EIS.
2	139-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The Town of Buckeye believes that if the SSEP uses a wet-cooled technology it should be required to replenish the aquifer, because without replenishment future water resources would dwindle.	BLM has reviewed the potential use of aquifer replenishment as a mitigation measure and has not included it in the final EIS for several reasons. First, based on a review of the potential water sources described in Section 2.9.7 of the draft EIS and the following subsections, in most cases the use of alternative water sources at the SSEP site would require pipelines and pumping, and their associated impacts. Thus, these sources would resolve one resource conflict at the expense of another. In addition, as documented in Section 2.9.7 of the draft EIS, the use of these sources for replenishment would generally be either speculative or economically infeas ble. Second, replenishment would not lessen the use of water; it would simply shift the (primarily socioeconomic) impacts of water consumption elsewhere in the region. Third, the use of water for the SSEP would be subject to the permitting requirements of the AZ DWR. The BLM does not have jurisdiction over the permitting of these water resources, and believes that the use of aquifer replenishment as a mitigation measure for SSEP impacts in unlikely to be implemented given that the SSEP has demonstrated that it would meet the permit requirements for a GIU permit.
273	143-B	WAT-2	Groundwater Impacts, Aquifer Drawdown	pg 4-163 Section 4.18.2 Groundwater needs more headers to guide the reader from topic to topic. Also an explanation of what an acre/ft is would likely be helpful for the average reader. Comparisons to other major water users (ie – other power plants, agriculture, residential developments, etc) may also be helpful.	Thank you for your comment. Acre-foot is defined in the glossary of the draft EIS. Also, Section 4.18.2.3 of the final EIS has been updated to provide an explanation of an acre-foot of water. Subheadings have been added to Section 4.18.2 to distinguish between impacts to individual wells and overall impacts to the long-term reduction of groundwater reserves.
274	143-B	WAT-2	Groundwater Impacts, Aquifer Drawdown	pg 4-167 Tables, Tables 4.75, 4.76, 4.77, and 4.78. These tables are difficult to understand. The information is straightforward but is not clearly presented so that the reader understands exactly what is being explained. It is also unclear what "impacted" means. As we discussed in the public meetings held at the end of April, the "impacts" experienced by each well and its owner will vary considerably depending on the physical construction and specifications of each well. This is an important nuance that should be specifically addressed in the FEIS.	Thank you for your comment. The tables have been combined into two tables in the final EIS to clearly distinguish between pumping rates and drawdown rates after 5 versus 30 years. In addition, the column heading has been changed from "Number of Wells Impacted" to "Number of Wells Experiencing the Level of Drawdown." Finally, the final EIS will include a qualitative discussion of the factors that contribute to various levels of impacts to individual wells.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
275	143-B	WAT-2	Groundwater Impacts, Aquifer Drawdown	pgs. 4-163 to 4-169, Section 4.18.2 Groundwater- The information presented in Chapter 3 is generally consistent with the information presented in the groundwater technical report. All of the comments below relate to Chapter 4, Section 4.18.2 (SSEP Impacts to Groundwater). BLM/SWCA used the model-predicted drawdown in neighboring wells as their primary metric for evaluating impacts to groundwater due to SSEP pumping, based on the list of registered wells compiled for the groundwater technical report. This was done only for the Proposed Action, given that no modeling was done for the alternatives. Drawdown in neighboring wells is a reasonable metric to use for this type of analysis. The results are presented in four tables (4.75 through 4.78) that list the number of wells within various drawdown ranges for the range of pumping (1,429 and 1,862 gpm) after 5 and 30 years. The number of wells within each drawdown range appears to be correct based on a spot-check of the results. Specific comments are listed below: ? Figure 4.4 is a graph of water level drawdown versus distance from the SSEP wellfield, with modeling results depicted for the range of pumping (1,429 and 1,862 gpm) after 5 and 30 years. The y-axis reads "Depth to Water (bls - feet)", but should read "Groundwater Level Drawdown (feet)". ? Figure 4.4 indicates, and the text states, that the maximum extent of the cone of depression after 5 years (based on the 2-foot drawdown contour) extends "approximately 3.3 miles east, west and north of the well field" for both pumping rates (1,429 and 1,862 gpm). However, the actual distance is between 2 and 2.5 miles from the well field. Figure 4.4 also indicates, and the text states, that the maximum extent of the cone of depression after 30 years (based on the 2-foot drawdown contour) for both pumping rates extends "approximately 10 miles southeast of the well field". However, the actual distance for the lower pumping rate (1,429 gpm) is between 7 and 8 miles from the well field.	Section 4.18.2.3 and Figure 4.5 have been revised in the final EIS in accordance with the comments provided.
308	143-B	WAT-2	Groundwater Impacts, Aquifer Drawdown	pg 4-210 to 4-216, Section 4.20.4.17 BLM/SWCA used model-predicted drawdown in the Rainbow Valley Sub-basin from SSEP and all other pumping as their primary metric for evaluating the cumulative impacts to groundwater, based on the list of registered wells compiled for the groundwater technical report. The overall magnitude of the impacts (drawdown and number of wells impacted) looks reasonable, based on a spot-check of the results. The total groundwater withdrawn (SSEP and others) was used as a secondary metric to compare water usage among the various alternatives, but the results were not tabulated as was done for the SSEP pumping alternatives.	Thank you for your comment.
5	148-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	While current rules may allow the SSEP to withdraw nearly 1 billion gallons a year, losing nearly all of the water to evaporation in cooling towers, this use appears inconsistent with the goal of the Phoenix AMA.	As described in Section 3.18.2 of the draft EIS, groundwater development for the SSEP must meet all AMA requirements as required by the General Industrial Use permit and water rights obtained for the project.
6	148-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The proposed action is also inconsistent with the recommendations of the "Best Management Practices and Guidance Manual: Desert Renewable Energy Projects," which was jointly developed by the Bureau of Land Management, the U.S. Fish and Wildlife Service, the California Energy Commission, and others. That manual states, "[t]he following critical actions provide guidance on how to address the major significant issues that usually arise when conducting environmental reviews ... 2) The project will not use fresh groundwater or surface water for power plant cooling."	Thank you for your comment. BMPs identified in the manual have been considered by BLM and incorporated where appropriate into the final EIS. However, this manual clearly states that guidance is voluntary and does not duplicate or supersede NEPA or other legal requirements.
10	148-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	The aquifer recovery times listed in Table 4-80 are easily misunderstood. The table and accompanying discussion appear to apply the 2,550 acre-feet per year recharge rate for the entire Rainbow Valley groundwater sub-basin to this one project. A table with recharge rates would be more informative in Section 4.20.17, in the cumulative effects on water resources.	Table 4.106 and the accompanying text have been modified in the final EIS to indicate that the aquifer recovery times shown only consider SSEP groundwater pumping under the action alternatives. They are not indicative of recovery times when also considering cumulative groundwater pumping. A discussion of aquifer recovery times considering cumulative groundwater pumping has been added to Section 4.20.4.17 of the final EIS.
7	150-O	WAT-2	Groundwater Impacts, Aquifer Drawdown	Arizona is an arid region of the country, water is critical to its future, and groundwater is already being depleted by numerous uses. Pumping and using groundwater to cool this project is controversial and could jeopardize public support for the project, as well as potentially making it more difficult to develop future projects due to public concern about water use.	Thank you for your comment. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
68	150-O	WAT-2	Groundwater Impacts, Aquifer Drawdown	From Attachment A, scoping letter: The DEIS should include a thorough analysis of groundwater withdrawal issues including potential long term effects on land subsidence and earth fissures.	Thank you for your comment. Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS. Long term effects of the project are described in Section 4.18.2.9 of the draft EIS.
4	161-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	We are concerned about things that would affect the Buckeye Hills Regional Park (and open space in general) included: The depletion of the ground water supply needed for the park, especially as improvements are made in the future to restrooms and more facilities are added.	Additional water demands associated with future growth in the Rainbow Valley Sub-basin are incorporated in the cumulative effects analysis of groundwater resources found in Section 4.20.4.17 of the draft EIS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
16	161-G	WAT-2	Groundwater Impacts, Aquifer Drawdown	In any case, it is mentioned that the water table would be allowed to drop up to 10 feet every five years, or up to 44 feet total (4.18.2.3). That is not sustainable.	Thank you for your comment.
7	4-I	WAT-3	Groundwater Impacts, Specific Well Drawdown	The proposed project as it stands, is predicting that they will drop the water table. Every homeowner in this area is on a well. If our well is not deep enough to accommodate the drop, the homeowner will have to dig a much deeper well to keep up with the drop in the water table. This is quite an expense. What protection do the property owners have if the plant dries up the wells?	It is outside the jurisdiction of the BLM to provide protection to individual wells. The General Industrial Use permit described in Table 1.5 and Section 3.18.2.2.2 of the draft EIS requires that SSEP will not cause the water level to decline to more than 1,000 feet below land surface over the life of the project. Compliance with this permit will be overseen by the Arizona Department of Water Resources.
1	7-I	WAT-3	Groundwater Impacts, Specific Well Drawdown	Please let me know if my home will be one of the 69 that will have draw down in 5 years or sooner - If so will the state produce a bond to get me at the depth of SSEE (900) to protect my well water interest. My registration # 55-206270	Appendices F and G of the final EIS have been updated with a complete list of wells surrounding the project that would be impacted by water withdrawals, including well number 206270. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot, after 5 years, and 30 years. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS. The state will not issue a bond for well impacts, however, all groundwater pumping associated with the SSEP will be conducted according to the GIU permit issued by ADWR (see section 4.18.2.3).
1	8-I	WAT-3	Groundwater Impacts, Specific Well Drawdown	I purchased my home 1 year ago and now I'm being threatened by this new proposed facility [for example] The possibility that there will be no well water due to the massive draw off from the new wells to be installed in the area	Thank you for your comment. Groundwater impacts are summarized in the draft EIS in Section 4.18.2 and detailed in Appendix E and Appendix F (F and G in the final EIS). A new alternative has been added to the final EIS that will use photovoltaic solar panels to generate electricity. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
1	30-I	WAT-3	Groundwater Impacts, Specific Well Drawdown	Also please let me know if my home will be one of the 69 that will have draw down in 5 years or sooner - If so will the state produce a bond to get me at the depth of SSEE (900) to protect my well water interest. My registration # 55-206270	Appendices F and G of the final EIS have been updated with a complete list of wells surrounding the project that would be impacted by water withdrawals, including well number 206270. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot, after 5 years, and 30 years. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS. The state will not issue a bond for well impacts, however, all groundwater pumping associated with the SSEP will be conducted according to the GIU permit issued by ADWR (see section 4.18.2.3)
8	134-I	WAT-3	Groundwater Impacts, Specific Well Drawdown	My well is not listed in your Draft Environmental Impact Study Statement Impact Study - April 2010 DES 10- 20. My property was not considered in your study. My well registration Number - 55-206270.	Appendices F and G of the final EIS have been updated with a complete list of wells surrounding the project that would be impacted by water withdrawals, including well number 206270. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. Under this sub-alternative, drawdown impacts from SSEP pumping will be less than 1 foot, after 5 years, and 30 years. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS. The state will not issue a bond for well impacts, however, all groundwater pumping associated with the SSEP will be conducted according to the GIU permit issued by ADWR (see section 4.18.2.3)
3	139-G	WAT-3	Groundwater Impacts, Specific Well Drawdown	The SSEP's well field is located within the City of Goodyear's planning area, but the well field is only located about 1,500 feet east of the Town of Buckeye's planning area. Consequently, groundwater pumping for the sSEP will lower the groundwater table within planning areas of both cities. Therefore, if the SSEP uses the wet-cooled technology it should be required to replinish the aquifer, and the replenishment should take place within the planning areas of both Goodyear and Buckeye.	BLM has reviewed the potential use of aquifer replenishment as a mitigation measure and has not included it in the final EIS for several reasons. First, based on a review of the potential water sources described in Section 2.9.7 of the draft EIS and the following subsections, in most cases the use of alternative water sources at the SSEP site would require pipelines and pumping, and their associated impacts. Thus, these sources would resolve one resource conflict at the expense of another. In addition, as documented in Section 2.9.7 of the draft EIS, the use of these sources for replenishment would generally be either speculative or economically infeas ble. Second, replenishment would not lessen the use of water, it would simply shift the (primarily socioeconomic) impacts of water consumption elsewhere in the region. Third, the use of water for the SSEP would be subject to the permitting requirements of the AZ DWR. BLM does not have jurisdiction over the permitting of these water resources, and believes that the use of aquifer replenishment as a mitigation measure for SSEP impacts is unl kely to be implemented given that the SSEP has demonstrated that it would meet the permit requirements for a GIU permit.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
3	143-B	WAT-3	Groundwater Impacts, Specific Well Drawdown	Boulevard believes that the characterization of impacts to adjacent wells from groundwater pumping will require updates in the FEIS. From a general standpoint, Boulevard agrees that the information currently in the DEIS accurately states the number of wells that would be impacted under different groundwater pumping scenarios. However, as was discussed during the public meetings in Phoenix, Gila Bend, and Buckeye on April 27, 28, and 29, the severity of these impacts will vary greatly from well to well, based primarily on each individual well's construction (i.e., depth, screening interval, pump setting, etc).	Thank you for your comment. The final EIS has been updated to reflect the various aspects of well construction affecting the specific impacts to an individual well.
6	4-I	WAT-4	Groundwater Contamination	The project is predicting use of salt water ponds for reclamation. Will the water table be compromised if there should be a leak? What guarantee do we have to protect our aquifer system? All homes in this area are on wells.	As described in Section 2.5.4.2.2 of the draft EIS, the evaporation ponds would be lined with both a primary liner and a secondary liner. In addition, a collection system would lie beneath the ponds to capture and monitor any leakage, although this is not expected. In addition, the evaporation ponds would be subject to the Arizona Aquifer Protection Permit (APP) program that is managed by the Arizona Department of Environmental Quality.
3	5-I	WAT-4	Groundwater Contamination	The backflow from the water intake will cause contamination to the well water.	An individual aquifer protection permit (APP) would be obtained from ADEQ and would ensure protection of the aquifer from contamination associated with the project. The ADEQ is the issuing agency for this permit and is also the agency that monitors and protects drinking water sources. See Section 1.6.4, Table 1.5 of the draft EIS and Section 4.18.2.1 of the final EIS.
2	7-I	WAT-4	Groundwater Contamination	will the state provide current water quality readings to home owners to protect them from drinking possibly contaminated drinking water due to possible contamination from the project	An individual aquifer protection permit (APP) would be obtained from ADEQ and would ensure protection of the aquifer from contamination associated with the project. The ADEQ is the issuing agency for this permit and is also the agency that monitors and protects drinking water sources. See Section 1.6.4, Table 1.5 of the draft EIS and Section 4.18.2.1 of the final EIS.
2	30-I	WAT-4	Groundwater Contamination	Will the state provide current water quality readings to home owners to protect them from drinking possibly contaminated drinking water due to possible contamination from the project?	An individual aquifer protection permit (APP) would be obtained from ADEQ and would ensure protection of the aquifer from contamination associated with the project. The ADEQ is the issuing agency for this permit and is also the agency that monitors and protects drinking water sources. See Section 1.6.4, Table 1.5 of the draft EIS and Section 4.18.2.1 of the final EIS.
3	134-I	WAT-4	Groundwater Contamination	Please provide monthly test reports to homeowners affected of the quality of our water	An individual aquifer protection permit (APP) would be obtained from ADEQ and would ensure protection of the aquifer from contamination associated with the project. The ADEQ is the issuing agency for this permit and is also the agency that monitors and protects drinking water sources. See Section 1.6.4, Table 1.5 of the draft EIS and Section 4.18.2.1 of the final EIS.
5	137-T	WAT-5	Surface Water Impacts	Concerns about the effect of ground water pumping on surface waters, impacts on the nearby Gila River that contains protected riparian and wetland habitat for the endangered Yuma Clapper Rail, the endangered yellow-billed cuckoo, and the southwestern willow flycatcher.	As discussed in Section 4.18.2.1 of the draft EIS, flow rates in the Gila River would not be impacted by groundwater withdrawals from the SSEP.
4	143-B	WAT-5	Surface Water Impacts	Boulevard requests that the BLM update the Chapter 3 and Chapter 4 Surface Water sections to reflect the latest surface water and drainage information. This information was not finalized when the DEIS was published and therefore, the FEIS will need to incorporate the updated information. Required updates include the following: (1) revised overall description of the drainage both in and around the Project area, (2) description of off-site flow collection, routing, and redistribution, (3) description of on-site drainage collection and distribution system, and (4) description of access road drainage system.	Thank you for your comment. Final surface water and drainage information has been incorporated into Sections 2.5.2.7, 2.5.2.8 and 4.18.1.3.1 of the final EIS.
269	143-B	WAT-5	Surface Water Impacts	pg 4-152 Section 4.18 Surface Water Chapter 4 needs some organizational work, with an overall description of the drainage concept at the beginning. • This chapter needs to describe how the off-site flows will be collected, routed around the site, and redistributed while not increasing the flows. • Descr be the onsite drainage collection and distribution system. • Descr be the drainage concept crossing the access roads. • Describe the drainage concept crossing the waterline.	Thank you for your comment. The on-site drainage collection and distribution system, access road crossings, and drainage crossing the waterline are described in Section 2.5.2.8 of the draft EIS. Section 4.18 of the draft EIS describes impacts associated with the drainage system but not the details of the drainage system itself.
270	143-B	WAT-5	Surface Water Impacts	pg 4-154-I Section 4.18 Surface Water proposed action needs more headers to guide the reader from topic to topic.	Thank you for your comment. Section 4.18.1. of the final EIS has been updated to include subheadings to separate impacts associated with floodplains and washes, water quality, and water quantity.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
271	143-B	WAT-5	Surface Water Impacts	pg 4-158 Section 4.18.1.3.2 Change: The road berm A collection channel system would also be constructed to provide site protection from off-site stormwater runoff during a 100-year return storm event. The toe of the western protective berm slope may be armored with soil cement cover and riprap to provide for slope erosion protection during a heavy storm event. Erosion protection may be necessary along portions of the channel collection system as identified in the hydraulic evaluation.	Thank you for your comment. Section 4.18.1.3.2 of the final EIS has been updated to reflect this addition.
272	143-B	WAT-5	Surface Water Impacts	pg 4-159 Section 4.18.1.3.2 Change to this sentence: The risk would be addressed by the re-routing of surface-water runoff around the proposed solar field and by the construction of ~~through~~ diversion channels. Change to this sentence: Under the Proposed Action, surface-water runoff from precipitation on the proposed solar field would be collected in ~~two~~ four stormwater sediment/detention basins in the proposed solar field.	Thank you for your comment. Section 4.18.1.3.2 has been updated in the final EIS to reflect the suggested changes.
15	148-G	WAT-5	Surface Water Impacts	The DEIS does not clarify where the rerouted surface water will be discharged. Will all the drainages at the project area's southern boundary, within the Waterman Wash watershed, discharge to a single point or multiple locations within the unnamed tributary to Waterman Wash?	Figure 2.9 has been updated in the final EIS to show updated drainage plans including multiple discharge points.
16	148-G	WAT-5	Surface Water Impacts	Similar concerns are more complicated at the south western portion of the project area, within the Rainbow Wash watershed. Will the redirected surface water carve a new drainage to the Rainbow Wash at the extreme angle at the southwest comer, discharge to the first drainage leading away from the project area on its western border, or be distributed to all the drainages leading away from the western and southern boundary of the project area?	Figure 2.9 has been updated in the final EIS to show updated drainage plans including discharge points. The channel bends will be rounded as much as practicable given available land constraints. In addition, the channel walls will be super-elevated per standard drainage engineering practice.
18	148-G	WAT-5	Surface Water Impacts	The FEIS should descr be the downstream impacts of rerouting surface water, including habitat impacts and physical changes.	Thank you for your comment. Impacts of rerouting surface water are discussed in Section 4.18.1.3 of the draft EIS. Section 4.18.1.3.2 of the final EIS has been changed to clarify that there would not be any habitat or physical changes associated with rerouting surface water because the hydrology would mimic natural flow patterns.
19	148-G	WAT-5	Surface Water Impacts	The FEIS should consider redirection of surface water outside the project area in wide and shallow channels intended to mimic a xeroriparian wash that avoids sharp angles. Plant communities could be re-located from existing washes and floodplains within the project area.	Figure 2.9 has been updated in the final EIS to show updated drainage plans including discharge points. The channel bends will be rounded as much as practicable given available land constraints. In addition, the channel walls will be super-elevated per standard drainage engineering practice. Impacts to vegetation (plant) communities, as well as mitigation, are discussed in Section 4.16 of the draft EIS.
20	148-G	WAT-5	Surface Water Impacts	The FEIS should descr be the potential impacts of surface water flow at the sharply angled southwestern and southeastern corners, should it remain a feature of the project area's flood protection.	Figure 2.9 has been updated in the final EIS to show updated drainage plans. The channel bends will be rounded as much as practicable given available land constraints. In addition, the channel walls will be super-elevated per standard drainage engineering practice.
22	148-G	WAT-5	Surface Water Impacts	The FEIS should descr be the BMPs to be used to ensure that discharges from the stormwater retention basin "match pre-development conditions." The FEIS should also define the term "peak discharges," explain procedures for non-peak discharges, describe the downstream impacts of flow changes, and identify discharge points and flow controls for the sediment/retention basins' water.	Thank you for your comment. Section 4.18.1.3.2 of the final EIS has been updated to describe the downstream effects of detention basins.
23	148-G	WAT-5	Surface Water Impacts	The FEIS should descr be the impacts of excess water provided to some drainages and reduced or no discharges to other drainages.	Thank you for your comment. Impacts of rerouting surface water were discussed in Section 4.18.1.3 of the draft EIS, and remain in the final EIS.
24	148-G	WAT-5	Surface Water Impacts	The FEIS should provide more detailed information about fencing and potential effects of fencing on drainage systems within the FEIS, and ensure that the fencing proposed for this project will meet appropriate hydrologic performance standards. The National Park Service recently published an article on the effects of the international boundary pedestrian fence on drainage systems and infrastructure. We recommend that BLM review this article to ensure that such issues are adequately addressed.	Section 4.18.1.3.2 of the final EIS has been updated to describe the effects of the drainage plan including fencing. The scenario presented in the NPS article is not directly comparable to SSEP. The fence installations referenced in the NPS article serve a vastly different purpose than the fencing to be employed at the SSEP. Border fencing is meant to serve as an effective obstacle to pedestrian traffic. The buried concrete footers along the length of the fence which prevent an easy breach of the obstacle are what force the design to incorporate the wide gauge "mesh" along drainage paths and also contribute to the scouring effect as surface water flows away from clogged crossing points. The perimeter fence at the SSEP is not intended to be a security barrier suited to close an international border; its purpose is to prevent the casual observer from damaging sensitive equipment and/or injuring themselves. The SSEP's drainage design will collect off-site/upstream flow in perimeter channels prior to these flows reaching the perimeter fence. The flows are intended to flow around, not through, the fence.
8	4-I	WAT-6	Permitting	Who will monitor the water usage by the plant? Should the plant decide to use more water than predicted, who will be policing?	The General Industrial Use permit issued by ADWR requires the permittee to monitor groundwater withdrawals. Section 3.18.2.2 of the final EIS has been updated to note this requirement.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
4	11-G	WAT-6	Permitting	Since the City will be approaching the maximum demand on the Rainbow Valley groundwater resource at the end of the projected life of the SSEP, the City definitely will want to be part of any permit renewal process that might be undertaken to continue the operation of the SSEP in order to review the potential impact of the project on the City's water supply at that time.	The General Industrial Use permit process is managed by the Arizona Department of Water Resources. BLM recommends that the City work with ADWR to review future impacts on the City's water supply.
1	11-G	WAT-7	Water Usage, Quantities/Analysis/ Assumptions	[The Committed Demand for the Rainbow Valley sub-basin used in the model simulations in the Golder Associates December 2009 report for Project No. 093-92820 was reviewed by the City of Goodyear staff in relation to the City's Integrated Water Master Plan (IWMP) document prepared by Black & Veatch dated June 2008… [See attachment for data] Since the IWMP document projected that the City intends to use 51,520 ac.ft./yr. from the Rainbow Valley aquifer, it would have been preferable for Golder Associates to have used this demand, rather than the 29,668.5 ac.ft./yr. that was used in the water report. It should be noted that the IWMP anticipated that the properties with the AWS designations for 29,668.5 ac.ft./yr. would be served by Goodyear from the 51,520 ac.ft./yr. noted in the IWMP. That would leave an additional demand of 21,852 ac.ft./yr. that the City intends to use that was not included in the Golder Associates water report	Section 4.20.4.17 of the draft EIS evaluates the cumulative impact of the project including reasonably foreseeable water demands. Future water demands that have not been approved through the Assured Water Supply Program were not included in this analysis because there is insufficient information and certainty about those demands. As discussed in the internal cooperator calls, the reasonably foreseeable water development used in the model was acceptable to all cooperating parties. The additional water demands projected for the City of Goodyear have not been approved for future development and are therefore not reasonably foreseeable or specific enough to use in the cumulative impacts analysis.
2	136-G	WAT-7	Water Usage, Quantities/Anaysis/ Assumptions	The Final EIS should address how the water supply projections were developed and reasons for the differences between June 2009 and April 2010 estimates. It should also express the water use requirements in gallons per MW hour (gaUMWh).	Between June 2009 and publication of the draft EIS, engineering refinements resulted in reduced water use estimates of about half, hence the difference between 4,875 acre-feet per year and 2,500 acre-feet per year. The April 2010 estimate was the best available at the time of publication, so no changes regarding water use have been made to the final EIS. However, in the final EIS Table 2.15 has been updated to include a row comparing alternatives in units of gallons per MW-hour.
4	139-G	WAT-7	Water Usage, Quantities/Anaysis/ Assumptions	The conclusion the a dry-cooled technology is not cost-effective does not consider the future cost of water for the SSEP's neighbors, Goodyear, Buckeye and other Arizona water users. The future costs of water resources in Arizona could far outweigh the cost of building and operating a dry-cooled plant.	Thank you for your comment.
11	148-G	WAT-7	Water Usage, Quantities/Anaysis/ Assumptions	The DEIS does not descr be the impact of the long-term trend of increasing population in Arizona and communities near the project area. While this trend has slowed with the current economic downturn, growth is expected to continue, placing a greater premium on resources such as groundwater.	Additional water demands associated with future growth in the Rainbow Valley Sub-basin are incorporated in the cumulative effects analysis of groundwater resources found in Section 4.20.4.17 of the draft EIS.
12	148-G	WAT-7	Water usage, Quantities/Analysis/Assumptions	To compound the problem described about aquifer recovery, Table 4.80 appears to calculate the aquifer recovery time incorrectly. The proposed action with gas co-firing would use 3,003 acre-feet of water per year and a total of 90,090 acre-feet over the life of the project. At a recharge rate of 2,550 acre-feet per year, given on page 4-172, the correct recovery time would seem to be 90,090 acre-feet divided by 2550 acre-feet per year or 35 years, not 25 years as listed in the table. The values for other alternatives also appear incorrect.	Table 4.106 and the accompanying text have been corrected in the final EIS in accordance with the comments provided.
13	148-G	WAT-7	Water Usage, Quantities/Anaysis/ Assumptions	The DEIS should calculate an aquifer restoration rate based on pumping throughout the aquifer, both inclusive and exclusive of the groundwater extraction from the SSEP.	Section 4.20.4.17.1 of the draft EIS describes the cumulative impacts of the SSEP and other current and reasonably foreseeable groundwater demands. Tables 4.114 and 4.115 of the final EIS have been updated to include the proportion of cumulative withdrawals associated with the SSEP.
2	84-I	WAT-8	use of reclaimed water	Is there not anyway to make the plant "More Green" by recycling water rather than removing a precious resource from the valley for all of its residents. I would appreciate some information on the impact the plant will have on the water table and whether the possibility of reclaimed water has been fully explored.	Thank you for your comment. Section 2.5.4.1.2 of the draft EIS describes the water cycling requirements the SSEP would need to comply with according to the Arizona Department of Water Resources. Groundwater impacts are summarized in the draft EIS in Section 4.18.2.3 and detailed in Appendix E and Appendix F (F and G in the final EIS). Section 2.9.7 of the draft EIS describes alternative waters sources, including reclaimed water, that were considered for the SSEP as well as the reasons why each was not deemed feas ble as a water supply for the project. Detailed analysis of an alternative using photovoltaic technology to generate electricity (Sub-alternative A1) has been incorporated Into the final EIS. The water use for this alternative is less than all of the alternatives analyzed in the draft EIS. A summary of water use for all alternatives has been incorporated into Section 4.18.2 of the final EIS.
29	148-G	WAT-8	use of reclaimed water	The FEIS should evaluate potential sources of reclaimed water from all wastewater treatment plants in at least a 40-mile radius.	Additional sources of water were considered during alternatives development. No reclaimed water could be identified for the project in sufficient quantities to meet the project needs. Please see Section 2.9.7 of the draft EIS for a complete list of sources of water considered but eliminated from detailed analysis.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
30	148-G	WAT-8	use of reclaimed water	The FEIS should evaluate industrial wastewater sources within at least 40 miles.	Reclaimed sources of water within 30 – 40 miles of the proposed project Right-of-Way were evaluated during alternatives development (see Section 2.9.7 of the draft EIS). No industrial wastewater sources are present within 30 – 40 miles of the proposed project. Although some potential reclaimed water sources were identified, many of the providers were unwilling or unable to sell sufficient reclaimed water to supply the project. Other water supplies were found to be infeas ble due to the high costs associated with securing easements, pipeline construction, operation, and maintenance. Please see Section 2.9.7 of the draft EIS for a complete list of sources of water considered but eliminated from detailed analysis.
2	11-G	WAT-9	Cumulative Impacts	For the purposes of the EIS, which has to consider cumulative effects that may occur from development planned within the foreseeable future, a related question is when this additional 21,852 ac.ft./yr. will be required. Based on population forecasts prepared by MAG through 2035 and an assumed growth rate of 1% per year for 2036 and beyond, as used in the IWMP document, it appears that the City of Goodyear will not reach maximum demand on the Rainbow Valley groundwater resource until after 2045 which is beyond the projected life of the SSEP	Thank you for your comment.
4	129-G	WAT-9	Cumulative Impacts	By itself, the project's impact on groundwater levels in Rainbow Valley appears to be minimal based on the Groundwater Resource Evaluation prepared by Golder Associates for the DEIS. However, the amount of development that is l kely to occur within the reasonably foreseeable future may have been underestimated in the Golder Associates report, since it only considered future development that had been processed through ADWR's Assured Water Supply Program, and the report assumed that no additional solar energy generation projects utilizing similar technology will be developed in this area.	Section 4.20.4.17 of the draft EIS evaluates the cumulative impact of the project including reasonably foreseeable water demands. Future water demands that have not been approved through the Assured Water Supply Program were not included in this analysis because there is insufficient information and certainty about those demands. The BLM is unaware of other solar proposals that plan to withdraw from the same aquifer.
5	129-G	WAT-9	Cumulative Impacts	Although the City currently is not using any water from Rainbow Valley, this groundwater source was identified in the City's Integrated Water Master Plan as an essential part of the City's water resources and is part of the City's Assured Water Supply application that is pending before the Arizona Department of Water Resources. The City's IWMP identified a potential well field located along the banks of the Waterman Wash which is less than four miles from the proposed wells to serve this project. Based on the current depressed rate of growth in the Phoenix metropolitan area, the water usage projected in the proposed action may not adversely affect the City's ability to supply water in the Rainbow Valley area in the short term. However, the city will continue to grow in the Rainbow Valley area and there could be a point at which the City's water demand and that of the proposed action may be in conflict, particularly if the amount of groundwater drawdown projected in the Golder Associates report is exceeded, or the project is allowed to continue its operations beyond the 30-year initial lease period.	Thank you for your comment.
5	136-G	WAT-9	Cumulative Impacts	The project is located within the Phoenix Active Management Area, which is under a deadline to achieve safe-yield by the year 2025 through use of renewable water supplies, decreased ground water withdrawals, and efficient water use. There is little to no mention of how this project will affect this water management goal or how the project, particularly when taken cumulatively with other water supply demands (including those from other wet-cooling CST projects proposed for development), will affect the basin and state water budgets. The Final EIS should address these potential impacts.	Thank you for your comment. Section 4.20.4.17.1 of the final EIS has been updated to include discussion on how the project is in compliance with Phoenix AMA regulations.
294	143-B	WAT-9	Cumulative Impacts	pg 4.195 to 4-197 4.20.3 Section 4.20.3 (Reasonably Foreseeable Actions). Table 4.86 contains eight master planned communities (MPCs) within the "Rainbow Valley Sub-basin Cumulative Effects Analysis Area." The source of this information should be explained, given that only four MPCs have an approved Analysis of Assured Water Supply (AAWS) through ADWR. The other MPCs are not part of the approved developments that were modeled for the cumulative drawdown analysis.	Thank you for your comment. Table 4.113 of the final EIS has been revised to clarify which MPC's were identified as reasonably foreseeable and used in the cumulative groundwater drawdown analysis. Section 4.20.4.17 further explains why the four MPC's were used for this analysis.
5	77-I	WL-1	General Comment	I am excited about a renewable energy project here in our desert, but I am concerned that the disruption to habitat and conservation area be kept to a minimum.	Alternative B: Reduced Footprint was designed in part to address wildlife displacement and conservation concerns. The impacts of Alternative B and other alternatives on wildlife habitat are disclosed in Section 4.19 of the draft EIS.
2	81-I	WL-1	General Comment	I want to make sure that BLM here is not going to round up wild horses and burros like they are doing in Nevada and also California.	There are no plans to round up wild horses and burros as a part of this project.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
20	143-B	WL-1	General Comment	General. Usage of scientific names of plants and animals seems to be erratic. The scientific name of some species is used two or more times in the same chapter in some cases while other species are not accorded a scientific name – often in the same paragraph where others are given scientific names. The scientific name of a plant or animal should be provided the first time the plant or animal is mentioned and not again – this includes tabular data. i.e. If a plant or animal appears in a table with its scientific name before that plant or animal is mentioned in text, the scientific name does not appear in text at that point since the scientific name was given in the table.	The use of scientific names in the final EIS has been reviewed for compliance with BLM's style guide for the SSEP. Corrections were made as appropriate in the final EIS.
76	143-B	WL-1	General Comment	pg 3-120 Section 3.19.2 LORS should be spelled out	The acronym for Laws, Ordinances, Regulations, and Standards (LORS) has been replaced with the complete phrase in the referenced section of the final EIS.
78	143-B	WL-1	General Comment	pg 3-121 Section 3.19.2.4 LSFO should be spelled out	The acronym for Lower Sonoran Field Office (LSFS) has been replaced with the complete phrase in the referenced section of the final EIS.
79	143-B	WL-1	General Comment	pg 3-125 Section 3.19.4.1 Mule deer has no scientific name – see my general comment No. 1	The use of scientific names in the final EIS has been reviewed for compliance with BLM's style guide for the SSEP. Corrections were made as appropriate in the final EIS.
80	143-B	WL-1	General Comment	pg 3-126 Section 3.19.4.2 Unclear, - are the small mammals listed priority species of the LSFO?	Small mammals are not listed as priority species under the LSFO. The discussion about small mammals has been moved under Section 3.19.4.2.3 in the final EIS to avoid that confusion.
82	143-B	WL-1	General Comment	pg 3-130 Section 3.19.5.2.1 Woffinden? Or Wolfinden?	The correct citation is "Woffinden", as cited in Section 3.19.5.2.1 of the draft EIS.
84	143-B	WL-1	General Comment	pg 3-138 Section 3.19.6.3.2 Under Gila Monster ….."animals burrows" should be "animal burrows"	This revision has been made in the final EIS in the referenced section.
277	143-B	WL-1	General Comment	pg 4-175 General Comment 3 - Tables 4-81 and 4-62 plus others should have numbers centered under the column headings	Thank you for your comment. This concern has been addressed in the final EIS.
278	143-B	WL-1	General Comment	pg 4-176 General Comment 4 – Scientific names of badger and kit fox repeated on this page see General Comment 1	The use of scientific names in the final EIS has been reviewed for compliance with BLM's style guide for the SSEP. Corrections were made as appropriate in the final EIS.
279	143-B	WL-1	General Comment	pg 4-176 to 4-177, Section 4.19.2.1 3rdP Under the No-Action alternative, this paragraph states that wildlife habitat is (presently) impacted since wildlife are displaced from preferred habitat by vehicle noise. Later, it states that vehicle noise would affect wildlife physiologically, resulting in increased stress levels, increased energy expenditures, reduced fitness of individual animals, and reduced population health. How is this assertion proved? Where is the discussion of measurements or assessments or studies of wildlife stress levels, energy expenditures, and/or population health?	Thank you for your comment. Citations for this information have been added to the final EIS in Section 4.19.1. Because it is difficult to measure and compare wildlife stress levels pre- and post-construction, a discussion of measurements is not provided in the draft EIS or final EIS. A discussion of studies regarding the affects of elevated stress levels and other impacts due to road construction, maintenance, and traffic volume has been added to Section 4.19.1 of the final EIS. Additionally, a paragraph explaining the assumption that noise affects wildlife behavior proportionate to traffic volume and speed has been added to Section 4.19.1 (Analysis Area and Assumptions) of the final EIS.
280	143-B	WL-1	General Comment	pg 4-178, Section 4.19.2.2 2 It is asserted herein that increased exposure to human noise may affect individual animal stress levels for those highly mobile species that had to walk around the SSEP perimeter fence. As above, a discussion of measurements or assessments or studies to prove this assertion are lacking. From a scientific viewpoint, the perimeter fence levels were predicted in the Tech Report to generally be between 25 and 45 dBA. Document should cite impact assessment literature to establish that such relatively low noise levels would or may negatively affect wildlife of any species' particularly highly mobile animals.	Thank you for your comment. Citations for this information have been added to the final EIS in Sections 4.19.2.2 and 4.19.1. Additionally, a paragraph explaining the assumption that noise affects wildlife behavior proportionate to the volume and duration of the sound has been added to Section 4.19.1 (Analysis Area and Assumptions) of the final EIS.
281	143-B	WL-1	General Comment	pg 4-178 Section 4.19.2.2, 1st P (full) The assertion is made that increased amounts of human noise and activity would displace many wildlife individuals from an area around the Project Area, thus resulting in an impact. Later, with reduced human activity during on-going operations, the assertion is made that the displaced animals may return to the habitat surrounding the SSEP site. As above, some type of reference document or a modicum of discussion to back up these assertions needs to be cited.	Thank you for your comment. Citations for this information have been added to the final EIS in Section 4.19.2.2. Additionally, a paragraph explaining the assumption that human noise and activity affects wildlife behavior proportionate to the volume and duration of the sound has been added to Section 4.19.1 (Analysis Area and Assumptions) of the final EIS.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
282	143-B	WL-1	General Comment	pg 4-178 Section 4.19.2.2 In the third paragraph the point is made that the Sonoran Desert is not fire dependent. Reword this to make the message stronger and more clear that not only is the Sonoran Desert not fire dependent…it is pretty much totally fire intolerant.	Thank you for your comment. This sentence has been re-worded in the final EIS to address this concern.
283	143-B	WL-1	General Comment	pg 4-179 Section 4.19.2.2 2ndP(full) Assertions that 'noise pollution' (so far a defined term in the DEIS) would increase stress levels in wildlife. See comments above. Also, ground v bration is stated as causing increased stress levels, although in 4.9.3.2, the DEIS states that vibration levels from the SSEP facilities would be undetectable.	Thank you for your comment. A paragraph explaining the assumption that noise affects wildlife behavior proportionate to the volume and duration of the sound has been added to Section 4.19.1 (Analysis Area and Assumptions) of the final EIS. Citations supporting this information have been added to Section 4.19.1 of the final EIS and a reference to those citations added to Section 4.19.2.2 of the final EIS. It should be noted, however, that ground vibration and construction noise levels were predicted "at the nearest noise-sensitive receptors" (Section 4.9.3.2), which are 0.9 mile from the Project Area. These noise-sensitive receptor locations were developed based on human perception of sound and measured from places that humans are likely to be, such as residences and public spaces. Because of this, the noise analysis contributes to, but does not directly correlate with noise effects on wildlife. This information was added to Section 4.19.2.2 of the final EIS.
284	143-B	WL-1	General Comment	pg 4-179 Section 4.19.2.2 3rd P(full) The author seems to be backtracking on how human noise would result in wildlife impacts in using wording such as "it is likely" and "there is no research to support to what extent displacement…" and "the exact effects are unknown." Inconsistent with writing earlier in the document.	Thank you for your comment. Citations for this information have been added to the final EIS in Section 4.19.2.2 and this language has been revised to be consistent between sections of the document.
290	143-B	WL-1	General Comment	pg 4-189 Section 4.19.6 Residual impacts discuss impacts of the CCC pond removal. It has already been discussed that the pond would be rebuilt so no residual impacts would occur.	Although relocating the CCC stock pond would mitigate most of the effects of removing the original stock pond, there would still be some residual effects on wildlife species. These consist of some mortality of less-mobile species such as amphibians (eggs and tadpoles), the loss of breeding habitat for amphibians, and potential changes to wildlife movement patterns. These impacts are described in Section 4.19.6 of the draft EIS.
292	143-B	WL-1	General Comment	pg 4-190 Section 4.19.7 …..increased vehicle traffic	This revision has been made in the final EIS.
99	150-O	WL-1	General Comment	From Attachment A, scoping letter, Attachment A - Criteria for use in identifying appropriate areas for development: The Arizona Game and Fish department has identified lands throughout Arizona that are "low known conflict" for solar and other renewable energy development activities. However, this analysis places significant state-wide constraints on renewable energy development. Additional analysis is needed at a site-specific level to refine habitat and corridor data to determine whether renewable energy development may be appropriate in other areas not currently identified by the agency as "low known conflict."	Analysis and conclusions related to the referenced document are beyond the scope of this EIS analysis and the federal decision for the SSEP. The additional site-specific analysis suggested relates to the need to refine habitat and corridor data to determine whether renewable energy development may be appropriate in other areas not currently identified by AZGFD as "low known conflict". The suggested analysis does not relate to data gathering and analysis specific to the SSEP.
15	162-I	WL-1	General Comments	In this case, the DEIS does not address the issue of meta-populations of bighorn in the region and how this project might impact them, their movement, and genitive diversity of local populations	All relevant information available from AZGFD regarding metapopulations of bighorn sheep has been added to Section 3.19.4.2 of the final EIS. An analysis of the impacts of this project on the movement of bighorn sheep is discussed in Section 4.19.4.2.2 of the draft EIS, and is updated in the same section of the final EIS to include information about bighorn sheep metapopulations. This analysis uses the best data currently available to the BLM, provided by AZGFD.
5	74-I	WL-2	Wildlife Habitat Connectivity	I expect care has been taken to ensure the plant is situated so that it does not adversely effect wildlife corridors.	Impacts of this project on wildlife corridors are discussed in Section 4.19.4 of the draft EIS.
289	143-B	WL-2	Wildlife Habitat Connectivity	pg 4-185 Section 4.19.4.2.1 Vegetation clearing is probably not necessary for powerline construction in this area. Suggest rewording this sentence.	Vegetation clearing would be required during power line construction for the preparation of marshalling yards, access and spur road construction, and clearing and grading pole sites for the transmission tower foundations. Please refer to Section 2.5.3.3.1 of the draft EIS for more detailed information.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
307	143-B	WL-2	Wildlife Habitat Connectivity	pg 4-214 Section 4.20.4.18.1 15-16 The DEIS states: "The presence and noise of human habitation and activity has reduced habitat quality." DEIS lacks definitive proof of this assertion. This is a very broad conclusion, but without clarifications or qualifications, thus implying that it pertains to all portions of the CEAA. Yet, even with expected, cumulative build-out with all identified RFA's, the amount of the CEAA that is potential developed was given as 11% (page 4-203), so how can all portions of the CEAA have reduced habitat quality if only 11% is under consideration for development in the coming years?	The projected 11% build-out quoted from page 4-203 refers to the 5-km CEAA that was used as the analysis area for the noise resource. The wildlife cumulative analysis uses the Rainbow Wash CEAA, as descr bed in Section 4.20.2 of the draft EIS. Because of this, the 11% build-out statistic does not directly transfer to the wildlife analysis. However, in Section 4.20.4.18 of the final EIS, the sentence has been changed to read as follows: "The presence and noise of human habitation and activity throughout areas that have been converted to commercial, residential, and agricultural land uses (as descr bed in Sections 4.20.4.8 [Noise] and 4.20.4.14 [Vegetation]) has reduced habitat quality for many wildlife species."
23	150-O	WL-2	Wildlife Habitat Connectivity	As impacts from the SSEP access road from SR 85 appear to be one of the major impacts to wildlife from the project, BLM should also analyze the economic feas bility of NextEra decommissioning and reclaiming the access road after project construction and providing access for operations and maintenance along existing roads east of SSEP. Providing operations and maintenance access from the east would greatly reduce impacts of SSEP during its 30 year project lifetime to the Gila Bend-Sonoran Desert National Monument Wildlife Linkage and the Buckeye Hills-Sonoran Desert National Monument Wildlife Linkage	The proposed access road off of SR-85 is intended to use primary arteries to the maximum degree possible to reduce impacts from the use of roads from the east (dust, traffic through residential areas, high traffic volume on low speed roads, etc). The BLM has proposed other mitigation measures for the road from SR-85 to address impacts to wildlife, which can be found in Section 4.19.5 of the draft EIS.
25	150-O	WL-2	Wildlife Habitat Connectivity	BLM should also analyze the economic feasibility of decommissioning and reclaiming the SSEP access road and providing operations and maintenance access from the east to limit impacts to wildlife linkages.	The proposed access road off of SR-85 is intended to use primary arteries to the maximum degree possible to reduce impacts from the use of roads from the east (dust, traffic through residential areas, high traffic volume on low speed roads, etc). BLM has proposed other mitigation measures for the road from SR-85 to address impacts to wildlife, which can be found in Section 4.19.5 of the draft EIS.
14	162-I	WL-2	Wildlife Habitat Connectivity	extend dendritically into the landscape beyond its boundaries. Things l ke prehistoric and historic trails and wildlife corridors connect the place to the surrounding area. Something glossed over by the DEIS is the fact that the BLM parcel where this project area is located is the only undeveloped connection left between the Gila River and SDNM. There are no long-term studies of the use of this corridor by wildlife, so there is no baseline upon which to determine whether or not construction of this industrial facility might irrevocably harm or even destroy wildlife populations in SDNM. It is well known that cutting off access to river corridors has significant impacts to wildlife, such as what has happened to the endangered Sonoran Pronghorn after access was cut to the Gila and Colorado Rivers.	The following sentence has been added to Section 3.19.6.1 (Gila Bend–Sonoran Desert National Monument Linkage): "The Gila Bend–Sonoran Desert National Monument linkage is the only wildlife corridor between the monument and the Gila River that avoids existing suburban development (Beier et al. 2008)." Additionally, language has been added to Section 4.19.4.2.1 of the final EIS that discloses additional impacts to wildlife from blocking access to river corridors.
77	143-B	WL-3	Avian Wildlife	pg 3-120 Section 3.19.2.2 The first sentence should state that the MBTA protects the majority of birds in the U.S….not just the migratory ones	This sentence has been changed in the final EIS to read "…provides protection for 836 bird species present in the United States, most of which are migratory."
81	143-B	WL-3	Avian Wildlife	pg 3-128 T.3.55 Leconte's thrasher should be Le Conte's thrasher	This has been addressed in the final EIS.
83	143-B	WL-3	Avian Wildlife	pg 3-130 Section 3.19.5.2.1 Under Peregrine Falcon, third paragraph, first sentence …….change to "wading birds"	This has been addressed in the final EIS.
285	143-B	WL-3	Avian Wildlife	pg 4-182 Section 4.19.3 Suite of birds. Also why is Crissal in Crissal thrasher capitalized?	These changes have been addressed in the final EIS.
286	143-B	WL-3	Avian Wildlife	pg 4-182 Section 4.19.3.2 Winter observations of birds and sign really does not suggest spring-summer breeding. Many areas with birds n winter do not have breeding birds in spring	Section 3.19.5.2.1 has been revised in the final EIS to include a footnote describing the likelihood of breeding owls in the Project Area.
287	143-B	WL-3	Avian Wildlife	pg 4-182 Section 4.19.3.2 3rdP Same unfounded assertions as above stating that human noise would displace burrowing owls.	Thank you for your comment. Citations describing these potential impacts have been added to the final EIS in Section 4.19.3.3.
288	143-B	WL-3	Avian Wildlife	pg 4-184 Section 4.19.3.4 8 Again, no basis has been given that human noise during construction makes it likely that habitat degradation would occur (to the burrowing owl population).	Thank you for your comment. Citations describing these potential impacts have been added to the final EIS in Section 4.19.3.6.
291	143-B	WL-3	Avian Wildlife	pg 4-190 Section 4.19.7 Again, no basis has been given that human noise during construction makes it likely that habitat degradation would occur (to the burrowing owl population).	Thank you for your comment. Citations describing these potential impacts have been added to the final EIS in Section 4.19.7.
27	148-G	WL-3	Avian Wildlife	The FEIS should discuss the potential of the evaporation ponds to attract ravens, and the impact of that on desert tortoises.	This information has been added to the final EIS in Section 4.19.3.3.

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Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
28	148-G	WL-3	Avian Wildlife	The FEIS should discuss additional mitigation measures to reduce the attractiveness of the evaporation ponds to migratory birds and water fowl. For example, the FEIS could describe potential bird hazing techniques and their effectiveness.	Section 4.19.5 of the draft EIS includes potential mitigation to exclude wildlife, including avian species, from the evaporation ponds. This section has been revised in the final EIS to include hazing. The effectiveness of the potential mitigation is considered in the evaluation of residual impacts in Section 4.19.6 of the draft EIS and and Section 4.19.5 of the final EIS.
1	135-G	WL-5	Mitigation	The Department and Bureau of Land Management (BLM) representatives met on May 20th to discuss a Department suggestion to include removal of documented occurrences of badger and kit fox in the preconstruction plans to relocate burrowing owl. We agreed to incorporate removal of kit fox and badger with existing plans to relocate all burrowing owls preconstruction as a project mitigation measure. We agreed that biological surveys conducted for development of the Environmental Impact Statement should be supplemented with a complete survey of the entire project footprint to locate and mark all burrows occupied by owls, kit fox and/or badger. A survey proposal (with costs) is forthcoming from the Department. Survey results for kit fox will be used to decide on relocation procedures. Relocation procedures may involve fitting all trapped fox with GPS collars to evaluate a) the success of trap and relocation efforts and/or b) the response of kit fox to site development with no intervention to relocate. The Department will provide BLM with a second proposal for the trapping and removal of owls, kit fox and badgers, as well as potential deployment of GPS and monitoring research to evaluate management actions. Immediately prior to construction all burrowing owls will be relocated to a site determined by BLM and all badger will be released at a location to be determined by the Department.	Chapter 5 of the final EIS has been updated to include reference to proposals provided by AZGFD to Boulevard. The updated Chapter 5 also includes reference to an MOU that would be entered into between AZGFD and Boulevard. Proposals can be found in the Administrative Record for the SSEP.
4	135-G	WL-5	Mitigation	We also strongly recommend including the Departments proposals for mitigation/compensation for loss of wildlife habitat. Currently, the DEIS does not require any mitigation and sets an unwarranted precedent	Chapter 5 of the final EIS has been updated to include reference to proposals provided by AZGFD to Boulevard. The updated Chapter 5 also includes reference to an MOU that would be entered into between AZGFD and Boulevard. Proposals can be found in the Administrative Record for the SSEP.
5	150-O	WL-5	Mitigation	BLM should improve the wildlife mitigation section to: 1) improve the format of the content, enabling readers to clearly link impacts and mitigation measures, 2) include additional detail about proposed on-site mitigations measures, 3) commit to further consideration and analysis of potential off-site mitigation measures that NextEra could perform, and 4) specify which mitigation measures will be required as terms and conditions in the Record Of Decision (ROD).	Thank you for your comment. 1)The language in Section 4.19.5 of the final EIS has been augmented to help the reader more effectively link each mitigation measure with the impact it is meant to mitigate. 2) The BLM feels that the level of detail provided in the wildlife mitigation measure section is sufficient for the purposes of this document. Additional detail will be provided by the BLM in the ROD, per 40 CFR 1505.2(c). 3) Additional proposed mitigation submitted by AZGFD has been included in Section 4.19.5 of the final EIS. 4) The purpose of this document is to assist the BLM in preparing a ROD. Mitigation measures required under the ROD will not be finalized until the EIS is finalized.
12	150-O	WL-5	Mitigation	Further, some of the wildlife mitigation measures in the DEIS are well thought out and appropriate.	Thank you for your comment.
13	150-O	WL-5	Mitigation	However, the way the wildlife mitigation measures are spread throughout the document is confusing, and some measures are not even specifically set out in the DEIS, but rather require the reader to refer to the 35-year-old BLM Resource Management Plan (and amendments) for the larger area in which the project is proposed.	Section 2.3 of the final EIS (Features, Management, and Considerations Common to Each Action Alternative) has been revised to clarify the placement and incorporation of mitigation measures in the final EIS, and also to provide specific stipulations from the BLM *Lower Sonoran Field Office Resource Management Plan*.
20	150-O	WL-5	Mitigation	BLM should increase the certainty in what, where, when, and how mitigation measures will be carried out and how they will be monitored. For example, the mitigation measure to prevent wildlife exposure to selenium in evaporation pond water states: In order to prevent wildlife exposure to selenium or other potentially toxic constituents in evaporation pond water, wildlife would be excluded from accessing these ponds through a combination of fencing and netting or other suitable measures. Alternatively, other suitable measures would be identified and implemented that would similarly ensure that there was a minimal risk of harm to wildlife. (p. 4-187, emphasis added) This language does not provide any certainty for what measures would actually be implemented to prevent wildlife exposure to selenium, nor does it specify how monitoring and any necessary adaptive management will be conducted.	The specific mitigation measure cited has been revised in the final EIS to read: "In order to prevent wildlife exposure to selenium or other potentially toxic constituents in evaporation pond water, wildlife would be excluded from accessing these ponds through a combination of fencing, netting, hazing, or other similarly effective measures." Specific mitigation measures will not be selected for implementation until the BLM publishes a ROD. Per 40 CFR 1505.2(c), the ROD will summarize and adopt a monitoring and enforcement program for the selected mitigation measures.
21	150-O	WL-5	Mitigation	Of particular concern is how NextEra intends to prevent migratory birds from accessing the evaporation ponds.	Boulevard has not included a design feature to limit access to the ponds. In Section 4.19.5 of the draft EIS and final EIS, BLM has reworded the mitigation measure to read as follows: "In order to prevent wildlife exposure to selenium or other potentially toxic constituents in evaporation pond water, wildlife would be excluded from accessing these ponds through a combination of fencing, netting, hazing or other similarly effective measures." The methods by which this exclusion would occur are undetermined and will be worked out with involvement by the BLM and USFWS.

Table A.2 Draft EIS Comments and Responses

Comment No.	Letter No.	Resource Code	Resource Subcode	Text	Response
61	150-O	WL-6	Special Status Species	From Attachment A, scoping letter: The Arizona Game and Fish Department has conducted an analysis of this area and lists species of concern as: Western Burrowing Owl, Sonoran Desert Tortoise, and Least Bittern (bat). Recommendation: The BLM should prioritize protection of species in the project proposal area by further analyzing potential impacts and developing Best Management Practices and steps to minimize and mitigate any unavoidable impacts. The draft environmental impact statement (DEIS) should analyze impacts on each of these species, as well as other wildlife, and develop an alternative that limits the impacts to the greatest degree possible.	The impacts of this project on special-status species are descr bed in the draft EIS in Section 4.19.3 Special-status Species. Additionally, Appendix D (E in the final EIS) of the draft EIS presents all special-status species considered and which ones were retained for detailed analysis in the body of the draft EIS. Protection of these species is prioritized according to BLM policy (Manual 6840), as is descr bed in the draft EIS in Section 3.19.2.4. Developing Best Management Practices (BMPs) for these species is out of the scope of the decision to be made by the BLM because BMPs are created through BLM policy, and are not determined through the NEPA process for this site-specific project; however, species-specific mitigation measures are listed in Section 4.19.5. Potential impacts of this project to general wildlife species and special-status species are analyzed in Section 4.19 of the draft EIS. Lastly, Alternative B: The Reduced Footprint Alternative was developed in part to reduce impacts on wildlife.

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