



BRIAN SANDOVAL
Governor

STATE OF NEVADA
DEPARTMENT OF WILDLIFE

1100 Valley Road
Reno, Nevada 89512
(775) 688-1500 • Fax (775) 688-1595

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

December 9, 2011

KENNETH E. MAYER
Director

RICHARD L. HASKINS, II
Deputy Director

PATRICK O. CATES
Deputy Director

DOCKET

11-AFC-2

DATE DEC 09 2011

RECD. DEC 15 2011

NDOW-SR#: 12-061
SAI#: E2012-064

Mr. Gregory Helseth, RECO Project Manager
Bureau of Land Management
Southern Nevada District Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130

Re: EIS Scoping: Valley Electric Association's Proposed Hidden Hills Transmission Project (HHT)

Dear Mr. Helseth:

The Nevada Department of Wildlife (NDOW) thanks you for this opportunity in helping identify potential issues regarding the applicant's request for a right-of-way (ROW) authorization for the construction, operation, maintenance, and termination of transmission infrastructure improvements. We understand the improvements include both 230 kV and 500 kV power lines, and a natural gas pipeline that would support operations of BrightSource Energy's proposed 500MW Hidden Hills Solar Electric Generating System along the state line in Inyo County, California. The 3,275-acre solar energy site would be located on privately-owned land and is under separate review by the California Energy Commission. However, the majority of the HHT's ROW for power transmission lines and natural gas line would be located on public land in Nevada managed by the BLM and is subject to NEPA review. With respect to NEPA the HHT is considered an action connected with the proposed Hidden Hills Solar Electric Generating System (HHSEGS).

NDOW was queried this past September for information on eagle and bighorn sheep distribution and habitats in Nevada by CH2M Hill, the environmental contractor for the HHSEGS, as field surveys related to the project were scheduled to occur soon. This query included information germane to the proposed HHT. Information was provided to aid in field survey objectives. Mindful of the significant linkage of the two projects NDOW expects this and other substantive information compiled and synthesized by the respective HHSEGS and HHT applicants and permitting agencies will be openly shared for broader analysis and potential mitigation purposes.

Preliminary identification of wildlife, associated habitats, and wildlife-related activities in the HHT project region include but are not limited to:

- Impact considerations to species protected under the federal Endangered Species Act, are BLM sensitive species and State of Nevada protected wildlife (NAC 503) and wildlife of conservation priority*. These would include but not be limited to the desert tortoise, Gila monster, Nelson (desert) bighorn sheep, golden eagle, burrowing owl, other raptors and migratory birds like,

* Online at http://www.ndow.org/wild/conservation/#wildlife_action ; revis

- the phainopepla which has an established ecological relationship with mature mesquite and catclaw acacia stands (bosques and stringers) where mistletoe parasitizes these plants. Additional to the phainopepla, mesquite and catclaw acacia habitats with which the proposed project may overlap and/or groundwater drawdown by the HHSEGS might adversely affect, has potential for presence of species having restricted habitat requirements like LeConte's thrasher, desert kangaroo rat and desert pocket mouse.
- Use of bird perching deterrents and non-lattice design transmission structures such as Tubular-H for the 500kV alignment and tubular monopole for 230kV alignments where horizontal surfaces are minimized with "inverted Y" bars or similar perching discouragers effective principally on ravens and raptors. Where guy wires are involved, use of bird diverters are recommended;
- Development and implementation of a raven/raptor management plan including protocols addressing transmission infrastructure modifications or other proactive measures when project features inadvertently create an artificial subsidy of perching and nesting sites.
- Exploring and developing reasonably implementable alternatives whereby the number and position of transmission alignments, substations, and energy generation facilities effectively minimize disturbance in the affected region at the landscape level. This may entail double or multiple-circuit structure alignments in anticipation of future utility projects, and or sharing of existing ROW's where retrofits for other projects having transmission destinations in common with the HHT (e.g. the Eldorado substation) are coincidental.
- Instituting seasonal construction restrictions during biologically sensitive periods for wildlife (e.g. breeding season, extreme physiologically stressful periods like the dry season);
- Avoiding conflicts between construction activities with other land uses resulting in physical denial of access by the sporting public participating in once-in-a-lifetime hunting opportunities for species like bighorn sheep in the mountainous reaches of the proposed HHT.
- Developing protocols addressing open trench work for 1) avoiding entrapment or entombment of wildlife associated with gas pipeline construction, and 2) timing of gas line construction with aerial transmission installation resulting in extended periods of hazards and stresses to wildlife.
- Including the NDOW's Gila monster encounter protocol into the site plan of development and/or forwarded to the principal contractor for awareness during construction. It is available online at http://www.ndow.org/wild/conservation/reptile/07Gila_Protocol.pdf.

NDOW was recently invited by your office to participate as a cooperating agency in preparation of the HHT EIS. NDOW welcomes this opportunity and looks forward to working with the BLM, the ROW applicant and other cooperators. I would serve as the point of contact for NDOW. For additional assistance with subject matter in this letter, please do not hesitate in directing any correspondence to my attention.

Sincerely,



D. Bradford Hardenbrook
Supervisory Habitat Biologist
Southern Region, Nevada Department of Wildlife
4747 Vegas Drive, Las Vegas, Nevada 89108
702.486.5127 x3600; 702.486.5133 FAX
bhrdnbrk@ndow.org

Cc: California Energy Commission
Nevada Division of Water Resources
NDOW, Files
Nevada State Clearinghouse