

CALIFORNIA ENERGY COMMISSION

REPORT OF CONVERSATION

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DOCKET

11-AFC-2

DATE DEC 15 2011

RECD. DEC 16 2011



Siting, Transportation, and Environmental Protection Division

FILE: 11-AFC-2

PROJECT TITLE: Hidden Hills SEGS

<input checked="" type="checkbox"/> Email	<input type="checkbox"/> Meeting Location:		
NAME:	Mike Monasmith	DATE:	12/15/11
WITH:	Brad Hardenbrook, Nevada Department of Wildlife		
SUBJECT:	HHSEGS -- water		

To:
Mike Monasmith, Energy Commission Senior Project Mgr
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5112
Mike.Monasmith@energy.state.ca.us

Dear Mr. Monasmith,

I understand the comment deadline on the AFC for the proposed Hidden Hills Solar Energy Generation System (HHSEGS) has lapsed. Early on there was some confusion on my part in discriminating between the two projects until fairly recently. Notwithstanding, groundwater drawdown in the Pahrump Valley has been a concern and as you may be aware that in the past water diversions and groundwater drawdown for a variety of uses led to extirpation of the now Federally listed as Endangered Pahrump Poolfish from its endemic habitat by the late 1970's and the extinction of two other subspecies of this fish native only to Pahrump Valley. Hopefully, the present operations need of 140 ac ft yr of water by the HHSEGS will not result in further lowering of the water table in the greater Pahrump Valley adversely affecting remaining springs or the future of locally extant Mesquite/Catclaw Acacia stands. These areas literally provide oases for a variety of wildlife, whether resident or migrant. The Mesquite/Catclaw Acacia stringers and galleries (aka bosques) support wildlife of conservation priority in Nevada, most notably the phainopepla which has an intimate ecological relationship with mature mesquite and catclaw acacia parasitized by mistletoe. Should an adverse drawdown scenario result, it would not likely be observable for many years. The Nevada Department of Wildlife does not have studies or other data quantifying or predictably demonstrating that groundwater drawdown below existing levels would cause local ecological degradation or collapse; however, a request is made that effective, meaningful water draw monitoring and mitigation for such an event is woven into stipulations of the AFC or related mitigation instruments.

For your files, please find the attached pdf file containing the Nevada Department of Wildlife's EIS scoping comments to the BLM regarding the Valley Electric Association's proposed Hidden Hills Transmission project.

Sincerely,

Brad

D. Bradford Hardenbrook
Supervisory Habitat Biologist
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CC: Carol Watson, Staff Biologist

Mike Conway, Staff Hydrologist/Geologist

Chris Davis, Siting Office Manager

Dick Ratliff, Staff Counsel

Prepared by: Mike Monasmith, Project Manager



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December 9, 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,



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